



Kansas Statewide
Homeless Coalition

Kansas Balance of State Continuum of Care Coordinated Entry Policies and Procedures

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Coordinated Entry System

The purpose of this Coordinated Entry Policies and Procedures document is to guide the operation of the Kansas Balance of State Continuum of Care (KS BoS CoC) Coordinated Entry process. A Coordinated Entry (CE) process represents a new approach to coordination and management of a Continuum of Care's (CoC) housing crisis response system. CE enables each Region to effectively and efficiently connect people in crisis to interventions that will rapidly end their homelessness.

The CoC program interim rule (24 CFR 578) released by HUD in 2012 requires the establishment of a "centralized or coordinated assessment system," hereafter referred to as Coordinated Entry. The rule defines Coordinated Entry as:

A centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. [Such a] system covers the [Region's] geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool. ([24 CFR part 578.3](#))

Both the CoC Program interim rule and the Emergency Solutions Grants (ESG) program interim rule ([24 CFR part 576](#)) released in 2011 require that programs operated by recipients and sub-recipients of CoC Program or ESG grant funds must participate in the established Coordinated Entry process.

This document will be updated to reflect changes to Federal Regulations. All issues not addressed in this document related to Coordinated Entry are governed by Code of Federal Regulations, HUD Memos and Notices, guidelines, and other applicable law.

Definitions

CES List: A list in the Coordinated Entry System that prioritizes people experiencing homelessness for assistance due to a scarcity of housing resources. Also known by other communities as "active list", "master list", or "by name" list. The HMIS Vendor utilizes the name "Community Queue". The KS BoS CoC utilizes the name "CES list".

CES Lead Agency: The KS BoS CoC has designated the Kansas Statewide Homeless Coalition to serve as the CES Lead Agency.

CES Participating Agencies/Programs: CoC and ESG-funded shelter and housing programs that are required to participate in coordinated entry, as well as other publicly and privately funded shelter and housing programs serving people experiencing homelessness.

CES Participants: Households, including unaccompanied children and youth, experiencing homelessness or who have been connected to housing through the Coordinated Entry process.

CES Team: A team comprised of the Regional Coordinators and Coordinated Entry staff.

CoC Collaborative Applicant: The KS BoS CoC has designated the Kansas Statewide Homeless Coalition to serve as the CoC Collaborative Applicant.

Coordinated Entry Access Points: Also known as Access Points, these are defined as places – either virtual or physical – where an individual or family in need of assistance accesses the Coordinated Entry System.

Coordinated Entry Committee (CEC): This committee of the KS BoS CoC shall guide the operation of the coordinated entry system which includes but isn't limited to selecting an assessment tool, review/update/approve the CES policies and procedures, modify the process as needed to reflect regional needs, review CES appeals and ensures the implementation of the CES aligns to the CES policies and procedures. The CEC meets monthly and notice of these meetings are provided at www.kshomeless.com/calendar.

Coordinated Entry Regional Meetings: Regional Coordinators are required to bring CES regional partners together to meet at least once every month to review and update the CES list, case conference and make referrals. These meetings are not open to the public in order to protect CES participant confidentiality and only those agencies that participate in CES can attend.

Coordinated Entry System Staff: These positions are provided by the CoC CES Lead Agency to oversee all aspects of the CES for the KS BoS CoC. The CES staff will ensure that all HUD required elements of the CES are met by identifying best practices and updating the CES policies and procedures. The CES staff provides training and technical assistance, coordinating, facilitating, and participating in meetings and conference calls to monitor and help remove barriers to housing resources and services on behalf of the CES.

HMIS: A Homeless Management Information System (HMIS) is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness.

HMIS Lead Agency: An agency, organization or government department designated by CoC to administer and manage the Homeless Management Information System (HMIS). The KS BoS CoC has designated Kansas Housing to serve as the HMIS Lead Agency.

HMIS Vendor: An agency that provides and supports a computerized data collection tool (HMIS) designed to capture client-level information over time on the characteristics and service needs of individuals and families experiencing homelessness, while also protecting client confidentiality. The KS BoS CoC has designated Bitfocus, Inc. as the HMIS Vendor.

Referring Agency: An agency or organization that refers or connects households that are experiencing homelessness or at risk of homelessness with an Access Point provider. For example, a hospital, school, community organizations, and non-access point homeless system providers.

Regional Coordinators: The KS BoS CoC includes 101 counties organized into 8 Regions and each region is managed by a Regional Coordinator. Regional coordinators work with all program grantees and other stakeholders in their region to accomplish the following:

- Organize and coordinate activities of the CoC at the regional level
- Assist to the CES staff to manage the Coordinated Entry System within their region
- Facilitate Point-in-Time counts
- Assist with program prioritization and completion of the Continuum of Care application
- Designing and implementing CES Regional Plan

- Ensure, organize, and facilitate the creation of a regional strategic plan to identify the causes of homelessness and action steps to address them based on input from regional service providers, elected officials, clients, and other stakeholders.
- Conduct a Coordinated Entry Evaluation Plan on a regional level.

Regional Meetings: Regional Coordinators host a meeting with CES participating programs, housing service providers, emergency service providers, landlords, healthcare agencies and any organization or person that has an interest in ending homelessness within their region to educate and inform each other on issues, concerns, needs or resources that assist the region in ending homelessness. These meetings occur at least once every quarter and notification of these meetings are located at www.kshomeless.com/calendar.

Vets At Home: The Vets At Home is a workgroup for the Veteran Leadership Team designed for the KS Balance of State to end Veteran Homelessness in the continuum. The team provides a Veteran representative to each region for the coordinated entry system who attends regional meetings and coordinates services for homeless veterans identified on the CES list.

Planning Coordinated Entry

The KS BoS CoC's CE process remains in full compliance with the requirements established by the CoC Program Interim Rules [24 CFR 578.3](#) and [24 CFR 578.7\(a\)\(8\)](#) as follows:

- The CES covers the entire geographic area claimed by the BoS CoC
- CES is easily accessed by individuals and families seeking housing or services.
- CES is well-advertised.
- CES includes a comprehensive and standardized assessment tool(s).
- CES provides an initial, comprehensive assessment of individuals and families for housing and services.
- CES includes a specific policy to guide the operation of the coordinated entry system to address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim specific providers.

According to [24 CFR 578.7\(a\)\(8\)](#), the KS BoS CoC, in consultation with recipients of Emergency Solutions Grants program funds within the geographic area, must establish and consistently follow written standards for providing Continuum of Care assistance which can guide the development of formalized policies and procedures for the coordinated entry process:

- Written standards provide guidance for evaluating individuals' and families' eligibility for assistance under [24 CFR Part 578](#).
- Written standards provide guidance for determining and prioritizing which eligible individuals and families will receive transitional housing assistance.
- Written standards provide guidance for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance.
- Written standards provide guidance for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance.
- Written standards provide guidance for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance.

The KS BoS CoC and each ESG recipient operating within the CoC's geographic area must work together to ensure the CoC's CE process allows for coordinated screenings, assessment and referrals for ESG programs consistent with the written standards for administering ESG assistance. [[24 CFR 578.7\(a\)\(8\)](#)] and [[24 CFR 576.400\(d\) and \(e\)](#)]

Affirmative Marketing

In order to reach persons who are most vulnerable to homelessness, who are unsheltered, or who may have barriers to accessing programs and resources, the KS BoS CoC ensures that access to local homeless systems and resources are well advertised to the entire community. This includes taking explicit steps to make advertising and communications materials easy to understand, making the system easily accessible, and taking specific action to reach out to those who may be least likely to seek out resources on their own. CE participating programs must develop and implement advertising and outreach strategies that clearly communicate how persons in need can access the CES. These strategies and related materials are explicitly aimed at persons who are homeless, vulnerable to homelessness, and/or who are unsheltered, disabled, and/or currently not connected to services.

The KS BoS CoC affirmatively markets housing and supportive services to eligible persons as follows:

- All CoC programs in the KS BoS CoC Coordinated Entry System must implement a strategy to ensure CoC resources and Coordinated Entry System resources are eligible to all people regardless of race, color, national origin, religion, sex, age, familial status or disability who are least likely to apply in the absence of special outreach and maintain records of those marketing activities. [[24 CFR 578.93\(c\)](#)] & [[24 CFR 576.407\(a\) and \(b\)](#)]. Housing assisted by HUD and made available through the CoC must also be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity or marital status in accordance with [[24 CFR 5.105 \(a\)\(2\)](#)] and [[5.106\(b\)](#)].
- All people in different populations and subpopulations in the KS BoS CoC's geographic area, including people experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence, have fair and equal access to the CES, regardless of the location or method by which they access the system. [[HUD CE Notice: Section II.B.5](#)]
- All CoC programs must provide appropriate auxiliary aids and services necessary to ensure effective communication, which includes ensuring that information is provided in appropriate accessible formats as needed, e.g., braille, audio, large type, assistive listening devices, and sign language interpreters. Programs may utilize services through the Kansas Relay Center for hearing and/or speech impaired individuals by calling 800-766-3777 (TTY/Voice), (866) 305-1343 (Español-TTY/Voz), (877) 787-1989 (Speech-to-Speech), (866) 931-9027 (Voice Carry-Over), accessibility@sprint.com (Email) or 877-877-3291 (Fax). [[HUD CE Notice: Section II.B.5.c](#)]
- Access points must be accessible to people with disabilities, including accessible

physical locations for individuals who use wheelchairs, as well as people who are least likely to access homeless assistance. [[HUD CE Notice: Section II.B.5.c](#)]

- Access points must be accessed by persons with Limited English Proficiency (LEP). [[HUD CE Notice: Section II.B.5.d](#)] Language Line Solutions may be utilized by Access Points to communicate with non-English speaking individuals in a situation when an interpreter is not present and/or available. Access Points can access Language Line by calling (785) 296-7714. The Access Point may be charged a fee for these services.

The CES will be well-advertised by utilizing the Kansas Statewide Homeless Coalition and partner websites, social media posts, fliers, brochures and pamphlets to promote the CES across Kansas. The Regional Coordinators may implement additional regional or county specific literature for more targeted advertisement, street outreach or direct contact with people at service sites including those that are experiencing chronic homelessness, veterans, families with children, youth and survivors of domestic violence to ensure these subpopulations have fair and equal access to the coordinated entry process. [[HUD CE Notice: Section II.B.5](#)]

Housing First

In alignment with HUD guidance, CES participating programs must adhere to Housing First principles. Housing First is an approach to connecting households experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment, or service participation requirements. Supportive services are client-driven and offered to maximize housing stability to prevent a return to homelessness, as opposed to addressing predetermined treatment goals prior to permanent housing entry. Housing First is an overarching philosophy and approach that can be applied to all homelessness. Housing First yields high housing retention and reductions in crisis or institutional care. HUD provides more information regarding Housing First requirements [here](#).

Non-Discrimination Requirements

The KS BoS CoC operates the CES as required in the [HUD CE Notice: Section I.D](#) that requires recipients of Federal and State funds to comply with applicable civil rights and fair housing laws and requirements. Recipients and subrecipients of CoC Program and ESG Program-funded programs must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws as specified at [24 CFR 5.105\(a\)](#), including, but not limited to the following:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial 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 or national origin under any program or activity receiving Federal financial assistance; and
- Title II of the Americans with Disabilities Act prohibits public 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 include 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 include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

In addition, HUD's Equal Access Rule at [24 CFR 5.105\(a\)\(2\)](#) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status, including any programs funded by the CoC Program, ESG Program, and HOPWA Program. The CoC Program interim rule also contains a fair housing provision at [24 CFR 578.93](#). For ESG, see [24 CFR 576.407\(a\) and \(b\)](#), and for HOPWA, see [24 CFR 574.603](#).

The Coordinated Entry System, especially during the referral process, ensures that 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. [[HUD CE Notice: Section I.D and II.B.3](#)]

Filing a Non-Discrimination Complaint

CES participants must be informed of the ability to file a nondiscrimination complaint at the time of completing the CES assessment [[HUD CE Notice: Section II.B.12.g](#)]. If the participant is dissatisfied with a service, decision, action or situation involving the CE process, or the participant wishes to file a complaint against a perceived unfair treatment, the following procedures can be followed:

- The CES participant can make a verbal or written complaint to the agency/organization who conducted the assessment for resolution.
- If the complaint is not resolved at the agency/organization level or if the CES participant does not feel comfortable making the complaint to the agency/organization, they may make this complaint to the Coordinated Entry Committee at coordinated_entry@kshomeless.com.
- Complaints regarding the scoring of a CES participant with the VI-SPDAT and/or program acceptance or denial will be reviewed within 30 days. The process may require the individual issuing the complaint to meet (either by phone, video or physically) and discuss the need of reconsideration.
- Within 7 business days after the review, the respondent will inform the CES participant of the resolution of the complaint, all measures taken to resolve complaint and the final decision.

Access Model

The Coordinated Entry System covers the KS BoS CoC's entire geographic area with Access Points that are accessible and well-advertised. Each region must choose at least one of the following five (or a combination of the five) ways to make their CES easily available:

- a. A central location or locations within a geographic area where individuals and families present to receive homeless housing and services;
- b. A 211 or other hotline system that screens and directly connects callers to appropriate homeless housing and service providers in the area;
- c. A “no wrong door” approach in which a homeless family or individual can present at any homeless housing and service provider in the geographic area but is assessed using the same tool and methodology so that referrals are consistently completed across the CoC;
- d. A specialized team of case workers that provides assessment services at provider locations within the CoC; or
- e. A regional approach in which “hubs” are created within smaller geographic areas.

As required by [HUD CE Notice: Section II.B.2.a](#), the KS BoS CoC offers the same assessment approach, including standardized decision-making, at all access points and all access points are usable by all people who may be experiencing homelessness or at risk of homelessness. Each region may decide to choose separate access points and variations in assessment processes to the extent necessary to meet the needs of the following five populations:

1. Adults without children
2. Adults accompanied by children
3. Unaccompanied youth
4. Households fleeing domestic violence, dating violence, sexual assault, stalking or other dangerous or life-threatening conditions (including human trafficking); and
5. Persons at risk of homelessness

For instance, if an unaccompanied youth who accesses CES at an access point that is defined for adults without children the youth is immediately connected to the youth-specific access point in the region. If no population-specific access point exists in the region, then the access point that they presented to must provide the CES assessment.

Access Point Locations

In coordination with the Coordinated Entry staff, Regional Coordinators will manage the list of access points locations for each region. Access points will be listed on the Kansas Statewide Homeless Coalition website at www.kshomeless.com and Coordinated Entry Flyers will be posted in public locations throughout each region.

Access Points may also provide assessments virtually, when a physical location is unavailable or the participant is unable to present to a physical location regardless of reason, through any of the following methods:

- Phone Call
- Video Call

An access point is not required to have access to the KS BoS CoC HMIS system to be an access point. However, if an access point does not have access to HMIS they must designate a contact person so the CES team can receive status updates on the CES participants.

The KS BoS CoC is open to partnering with neighboring CoC's to create additional procedures to assist in providing additional access points and referrals across the different CoC's in the state of Kansas.

Remote VI-SPDAT Request

The CES Lead Agency, Kansas Statewide Homeless Coalition, has implemented a remote VI-SPDAT Assistance Form for agencies/individuals needing assistance from KSHC to complete a VI-SPDAT with a client by phone. The KSHC will add the household to the appropriate Regional CES lists when appropriate. These requests are tracked and fulfilled by the CES team at <https://www.kshomeless.com/vi-spdatt-assistance>.

Accessibility

If a region has specific-population based access points, the region must ensure that households who are included in more than one of the populations for which an access point is dedicated (for example, a parenting unaccompanied youth who is fleeing domestic violence) can be served at all of the access points for which they qualify as a target population. [[HUD CE Notice: Section II.B.2.f](#)]

The KS BoS CoC ensures participants may not be denied access to the coordinated entry process on the basis that the participant is or has been a victim of domestic violence, dating violence, sexual assault or stalking. [[HUD CE Notice: Section II.B.12.e](#)]

Emergency Services & Safety Planning

People can access emergency services, including all domestic violence and emergency service hotlines, drop-in service programs, emergency shelters, domestic violence shelters and other short-term crisis residential programs, to operate with as few barriers to entry as possible. People can access emergency services, such as emergency shelter, independent of the operating hours of the CES assessment processes. [[HUD CE Notice: Section II.B.7](#)]

When a person utilizes emergency services outside the operating hours of the region's Coordinated Entry access points, the person will be referred to the access point, as soon as the access point is open, for intake and assessment. Emergency shelter and other emergency services will not be prioritized by need using the VI-SPDAT. All other housing programs, that are not considered emergency services, will be prioritized using the VI-SPDAT assessment.

HUD funded emergency shelters which require the use of CES are not required to receive a CES referral before enrolling a household into an emergency shelter or provide emergency shelter services. CES is not a barrier to emergency services. For households that want to be referred to a housing program or will stay in a HUD funded emergency shelter for longer than 72 hours a CES assessment must be conducted.

Outreach

The KS BoS CoC street outreach efforts are linked to the coordinated entry process; however, the KS BoS CoC defines outreach more broadly as any combination of programs, services, or staff likely to encounter persons who are experiencing a housing crisis, but whose regular focus

is much broader than homelessness. This broader definition of outreach could include homeless liaison staff associated with public schools, workers at social services offices, fire protection staff, police officers and other first responders. These individuals and community partners provide referrals to access points and/or completing the necessary training to provide the CES assessment. Each region will create a customized Street and Community Outreach process.

Diversion Screening

Diversion screening determines if households experiencing a housing crisis can be housed or remained housed without entering the homelessness system. This may mean that a housing crisis can be resolved by exploring solutions such as finding a friend or relative of the household who is willing to provide housing. Diversion screening helps to reduce unnecessary entries into the homeless system and standardizes access to program referrals. Access Points should conduct diversion screenings. KS BoS CoC's diversion screening tools are located [here](#).

HMIS & CES

The KS BoS CoC maintains a HUD-funded SSO-CE project which requires the CoC to collect Coordinated Entry data elements in HMIS. Additionally, the KS BoS CoC is required to produce a CE-specific Annual Performance Report (CE APR). The CE APR is unlike other CoC APRs in that it is generated across the entire CoC rather than a specific program. Additional information regarding the HMIS Programming Specifications for Coordinated Entry APR is located [here](#).

Coordinated Entry Assessments

In addition to the Universal Data Elements, CE systems are expected to record in the HMIS as many CE Assessments as are conducted with each client. This data element was designed to be used solely by CE projects and to collect, at minimum, an assessment date, location, and assessment results. It allows CoCs to define their own assessment questions and responses and to categorize multiple assessments as either crisis needs assessments or housing needs assessments. This element helps communities understand and monitor the assessment process in more detail and as it relates to participant outcomes. [FY 2022 HMIS Data Standards Manual] Refer to the below Assessment section for additional information.

Coordinated Entry Enrollment

All HMIS-participating continuum projects, including the Coordinated Entry project, are required to collect several data elements at enrollment. Therefore, all households must be enrolled into the "Homeless CES" program or "Prevention CES" program to collect this data. CES enrollment must always occur to demonstrate that the household was offered an assessment even in cases which the household denies completing the assessment.

Coordinated Entry Event(s)

Basic interactions in CE systems are expected to be captured using the CE Event data element. This data element is designed to be used solely by CE projects and to capture access and referral events, as well as the results of those events. The "Referral to scheduled Coordinated

Entry Housing Needs Assessment” event illustrates and proves that the agency offered the VI-SPDAT to the household. Utilizing this function is required.

Current Living Situation

According to the FY 2022 HMIS Data Standards, the Coordinated Entry process, users must record a Current Living Situation anytime any of the following occurs:

- A Coordinated Entry Assessment or Coordinated Entry Event is recorded; or
- The client's living situation changes; or
- If a Current Living Situation hasn't been recorded for longer than a community defined length of time (i.e., longer than 90 days) according to the CES List Inactivation section.
- Project Start

CES Exit

According to the FY 2022 HMIS Data Standards, the CES Exit represents the end of a client's participation with the CE system. The exit date should coincide with the date that the client is no longer considered to be actively seeking crisis or housing assistance from the CoC. Reasons to exit a client include:

- The client has entered a permanent residential project type (e.g., PSH) or is otherwise known to have found permanent housing.
- The client is known to have left the CoC to pursue other assistance or resources.
- The client is deceased.
- No staff working in the CE system (via appropriate case conferencing) has been able to locate the client for 180 days and there are no Current Living Situation records as determined by the CES List Inactivation section.

HMIS Data Standards

The KS BoS CoC may provide additional Data Quality Standards for the Coordinated Entry System within the HMIS Data Quality Plan.

Assessment

Assessment Tool

The KS BoS CoC’s CE process utilizes the same assessment process at all access points in order to apply a consist process throughout the CoC in order to achieve fair, equitable, and equal access to services within the community. The Coordinated Entry Committee (CEC) has approved the use of the following Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) as created and owned by OrgCode Consulting, Inc. (OrgCode):

- VI-SPDAT Version 3.0 for Single Adults
- VI-SPDAT Version 3.0 for Families

The VI-SPDAT is utilized as a triage tool intended to be used as an initial determination of potential housing and support needs for people experiencing homelessness. It includes documenting information about the barriers the person faces to being rapidly housed and any characteristics that might make the person more vulnerable while homeless.

CES Training

The Coordinated Entry Committee, the CES staff, HMIS staff and Regional Coordinators may collaborate in order to provide training opportunities at least once annually to organizations and/or staff persons at organizations that serve as access points or administer assessments. This training will provide KS BoS CoC updates and distribute training protocols. The purpose of the training is to provide all staff administering assessments with access to materials that clearly describe the methods by which assessments are to be conducted with fidelity to the KS BoS CoC's CES policies and procedures. [\[HUD CE Notice: Section II.B.14\]](#)

Assessment Training

Training will be provided at no cost, and it is mandatory for all individuals administering assessments, a training certificate must be kept on file with the Kansas Statewide Homeless Coalition. Training must be completed once every two years unless the CEC requires training to be completed sooner due to major changes in the assessment tool, best practices or CES policies and procedures.

Training curricula includes but is not limited to the following topics:

- Review of KS BoS CoC's Coordinated Entry Policies and Procedures including any adopted variations/addendums if applicable.
- Conducting the CES assessment
- Requirements for use of assessment information to determine prioritization.
- Criteria for uniform decision-making and referrals

While not necessarily required the KS BoS CoC highly recommends that individuals completing the assessment have completed a minimum of training and education on best practices for those experiencing homelessness and working with vulnerable populations which includes but is not limited to Housing First, Harm Reduction strategies, Motivational Interviewing, Trauma Informed Care and Cultural Competency.

Low Barrier

The assessment process will not screen people out of the CE process because of perceived barriers to housing or services, including but not limited to: too little or no income, active or a history of substance abuse, domestic violence history, resistance to receiving services, the type or extent of a disability-related services or supports that are needed, history of evictions or poor credit, lease violations or history of not being a leaseholder, or criminal record. [\[HUD Coordinated Entry Notice: Section II.B.4\]](#)

CES Reassessments

Households that have completed the VI-SPDAT previously may be reassessed due to any of the following situations:

- Major life changes or events have occurred since the last VI-SPDAT was conducted.
- Household composition has changed since the last VI-SPDAT was conducted.
- It has been a year or more since the last VI-SPDAT was conducted.
- New assessment tools have been approved and it has been at least 3 months since the last CES assessment was conducted.

Participant Autonomy During Assessment

The CES allows people presenting to the crisis response system the right to refuse to answer any assessment question and to reject housing and service options offered without suffering retribution or limiting their access to assistance. Assessment staff should always engage participants in an appropriate and respectful manner to collect only necessary assessment information, but some participants might choose not to answer some questions or could be unable to provide complete answers in some circumstances. The lack of a response to some questions potentially can limit the variety of referral options. When this is the case, assessment staff should communicate to those participants the impact of incomplete assessment responses. Assessment staff should still make every effort to assess and resolve the person's housing needs based on a participant's responses to assessment questions no matter how limited those responses. A participant's unresponsiveness may not affect future assessments or referral options.

**Note – Programs may require participants to provide certain pieces of information to determine program eligibility only when the applicable program regulation requires the information to establish or document eligibility.*

VI-SPDAT Denial

For households that have chosen to deny the completion of a VI-SPDAT, CES participating agencies must still complete a CES Program Enrollment, Current Living Situation, and the CE Event – Coordinated Entry Housing Needs Assessment. Within Clarity, agencies will select the "Refused VI-SPDAT" assessment option and at a minimum add the following:

- Assessment Date – (The date the assessment was offered).
- Assessment Location
- Assessment Type
- County
- Reason for Denial

Homeless Prevention

The KS BoS CoC does not designate separate access points for households to receive homeless prevention services. Therefore, all access points can utilize the Prevention/Re-Housing Vulnerability Index-Service Prioritization Decision Assistance Tool (PR-VI-SPDAT) Version 2.0 for individuals and for families to prioritize households for referrals to homelessness prevention services per [HUD CE Notice: Section II.B.8](#). According to OrgCode, the PR-VI-SPDAT "tool is to be

used ONLY with households that are currently housed and feel they are at imminent risk of losing their housing.”

The following score ranges will determine the level of service intervention provided:

- 22+:** Assess for high intensity supports such as medium-term rental assistance and rental arrears.
- 21 - 16:** Assess for moderate supports such as short-term rental assistance and rental arrears.
- 15 - 11:** Assess for one-time financial assistance such as rental application fees, security deposits, last month’s rent, utility deposits, utility payments and moving costs.
- 10 – 0:** Assess for least intensive service supports such as rapid resolution, self-resolution, referral to mainstream benefits and community resources. Homeless prevention services may also be provided such as housing search/placement, housing stability case management, mediation, legal services and credit repair.

Note: Households that score high may utilize any of the financial assistance and/or services in the lower score ranges to ensure successful homeless prevention. (For example, a household with a score of a 22 may also need rental application fees, security deposits, etc.)

For ESG-funded housing prevention programs, program eligibility and continued assistance must abide by the ESG Written Standards.

Homeless Prevention Referrals

The Homeless Prevention (HP) programs operate within Clarity as direct referral programs. When a household who is at risk of homelessness presents to any access point, the agency will conduct the Prevention VI-SPDAT. All agencies can directly refer a household to their own HP program or to a partnering agency’s HP program without placing households on a waitlist.

Prioritization

In the context of the CE process, HUD uses the term “Prioritization” to refer to the Coordinated Entry-specific process by which all persons in need of assistance who use CES are ranked in order of priority. The coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability.

VI-SPDAT Score

The VI-SPDAT establishes scoring criteria that translates the participant’s current living situation and barriers impacting participant’s ability to obtain and/or maintain housing into a numerical score that can be used to inform the prioritization process. The following score ranges will be prioritized first in descending order (highest to the lowest score):

For Single Adults

- 8+:** Assess for high intensity supports lasting for a longer duration of time such as Permanent Supportive Housing. (When Permanent Supportive Housing is not available other PH programs may be utilized such as Rapid Rehousing or Transitional Housing for example.)
- 7 - 4:** Assess for moderate and often time-limited supports such as Rapid Rehousing or Transitional Housing.
- 3 - 0:** Assess for least intensive service supports such as rapid resolution, self-resolution, mainstream benefits, community resources and minimal assistance from a housing service provider such as move in assistance.

For Families

- 9+:** Assess for high intensity supports lasting for a longer duration of time such as Permanent Supportive Housing. (When Permanent Supportive Housing is not available other PH programs may be utilized such as Rapid Rehousing or Transitional Housing for example.)
- 8 - 4:** Assess for moderate and often time-limited supports such as Rapid Rehousing or Transitional Housing.
- 3 - 0:** Assess for least intensive service supports such as rapid resolution, self-resolution, mainstream benefits, community resources and minimal assistance from a housing service provider such as move in assistance.

Client-Focused Case Conferencing

In cases where the assessment tool does not produce the entire body of information necessary to determine a household’s prioritization, either because of the nature of self-reporting, withheld information, or circumstances outside the scope of assessment questions, the KS BoS CoC allows case managers working with households to provide additional information through case conferencing.

Case conferencing as defined in HUD’s [Coordinated Entry Core Elements](#) is *“a meeting of relevant staff from multiple programs and agencies to discuss cases; resolve barriers to housing; and make decisions about priority, eligibility, enrollment, termination, and appeals. As the priority list grows and persons wait longer for referrals, the case conferencing approach is best equipped to adjust prioritization so that persons are offered other, potentially less intensive interventions rather than waiting for inordinate periods of time for more intensive interventions that might not exist or be available.”*

The VI-SPDAT assessment/score and case conferencing will prioritize households regarding any combination of the following factors as defined in [HUD CE Notice: Section II.B.3](#):

- Significant challenges or functional impairments, including any physical, mental, developmental or behavioral health disabilities regardless of the type of disability, which require a significant level of support in order to maintain permanent housing (this factor focuses on the level of support needed and is not based on disability type);
- High utilization of crisis or emergency services to meet basic needs, including but not limited to emergency rooms, jails, and psychiatric facilities;
- The extent to which people, especially youth and children, are unsheltered;
- Vulnerability to illness or death;
- Risk of continued homelessness;

- Vulnerability to victimization, including physical assault, trafficking or sex work; or
- Other factors determined by the community that are based on severity of needs.

Each region will conduct, at a minimum, monthly case conferencing. Each region can decide to meet more frequently.

In the cases, where an agency can only provide a household with short term assistance (for instance, the funding doesn't allow for long term support). The agency may request that referrals be sent from the bottom of the list to the top as approved by the region on a case-by-case basis.

Permanent Supportive Housing (PSH) Prioritization

In accordance with HUD's [Notice CPD-16- 11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#), prioritizing Permanent Supportive Housing programs for chronically homeless households is not a one-size-fits-all approach and should only be offered to those households that truly need the level of support provided by this program. In order to use the limited resources available within the community in the most effective way possible, the KS BoS CoC is committed to prioritizing PSH for those most in need through an established order of priority.

The KS BoS CoC has developed an order of priority to establish a process for prioritizing placement into PSH through the CES. The overarching intent of this order of priority is to ensure that chronically homeless households with the longest length of time homeless and the most severe service need are prioritized over other eligible households.

First Priority: The order of priority prioritizes chronically homeless households with the most severe service need. Chronically homeless households are offered housing interventions in descending order from highest VI-SDPAT score to lowest.

- Where two chronically homelessness households are presenting with an identical service need score, the household with the longest history of homelessness will be offered the housing intervention first, in descending order from longest to shortest history of homelessness (either continually or cumulatively).
- Where two households have matching service need score and length of homelessness, the household that had been identified in the community first, as recorded in HMIS, will be offered the housing intervention first.

Second Priority: If there are no chronically homeless households identified within the KS BoS CoC geographical coverage area, households that are not chronically homeless with the most severe service need will be offered housing interventions in descending order from highest VI-SPDAT score to lowest.

- Where two households are presenting with an identical service need score, the household with the longest history of homelessness will be offered the housing intervention first, in descending order from longest to shortest time homeless (either continually or cumulatively).

- Where two households have matching service need score and length of homelessness, the household that had been identified in the community first, as recorded in HMIS, will be offered the housing intervention first.

Evidence That There Are No Households Meeting the First Order of Priority: In the event that CES team is unable to locate a household that meets the first order of priority outlined above, the CES team will document how it was determined that there were no chronically homeless households that met a higher priority identified for assistance within the KS BoS CoC’s geographic area at the point in which a vacancy became available as outlined in the [Notice CPD-16- 11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#). This documentation will include evidence of all outreach efforts that had been undertaken to locate eligible chronically homeless households within the KS BoS CoC geographic coverage area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the household. Programs must keep this documentation on file for any non-chronically homeless households placed in PSH.

Transfers Between Programs

There are cases when the type of housing intervention may be found to no longer meet the needs of the household post-program entry. Transfers are appropriate for households in one of the following circumstances:

1. The household was eligible for a more intensive housing program (such as PSH VI-SPDAT score and chronic homelessness) but housed using RRH assistance. The household demonstrates that they will not be successful at the end of the RRH assistance and PSH is needed to maintain their housing.
 - If a CES participant is eligible for PSH and no units are readily available, the participant may be housed with RRH assistance through programs funded by CoC, ESG, SSVF and Veterans Homelessness Prevention Demonstration Program (VHPD). This participant will maintain his or her chronic homeless status for the purpose of eligibility for other PSH programs dedicated to serving the chronically homeless, such as HUD-VASH and CoC funded PSH (so long as they meet any other additional eligibility criteria for these programs). RRH participants maintain their chronically homeless status during the time period they are receiving RRH assistance.
 - RRH is a model for helping homeless individuals and families quickly obtain and maintain permanent housing, and it can be appropriate to use as a bridge to other permanent housing programs. It is important to note that although the participants in RRH are considered chronically homeless for purposes of eligibility for other programs, the housing itself is still considered permanent housing; therefore, these participants are not considered chronically homeless (or homeless) for counting purposes, and must not be included in the CoC’s sheltered Point-in-Time (“PIT”) count. ([HUD FAQ ID 530](#)). Documentation of chronic homelessness must be established and documented prior to the entry into the Rapid Rehousing program for this clause to apply.

2. The program loses funding and the housing provider can demonstrate that they are no longer able to support the household(s) by other means.

If one of the above situations occurs a housing program may seek a transfer to another housing program. The current housing provider is primarily responsible for identifying another provider of the appropriate program type that is willing to accept the household(s). The CES team can assist in this process. Upon agreement of the two housing providers, an email detailing the transfer request must be sent to the Coordinated Entry Committee (CEC) at coordinated_entry@kshomeless.com for review and approval. This approval is required for the household(s) in the housing program to bypass the CES list. Upon approval, the current program will provide all eligibility paperwork to the program accepting the transfer as the receiving provider is responsible for confirming eligibility. If no willing provider/program can be found, no transfer is possible.

Target Population

Each region may work with the CoC and ESG funded programs in their region to determine if they have identified a Target Population in their grant agreement with HUD. If a program has identified a target population, the region may designate that the priority for that population be sent to that program when a unit becomes available.

Special Needs Populations

The KS BoS CoC will address unique population-based vulnerabilities and provide focused specific resources and/or Coordinated Entry processes. The KS BoS CoC recognizes the sub-populations listed below and has determined the following processes and/or services for those populations:

- **Veterans:** In accordance with the federal plan to end veteran homelessness, the KS BoS CoC prioritizes single veterans and veteran families for homeless resources. Therefore, homeless persons/families identifying as a 'Veteran' during the Coordinated Entry Process will be referred to Veteran-specific housing resources. The Access Point, Regional Coordinator, CES staff and the Veteran Representative will collaborate to determine Veteran eligibility and available resources, including VA, VASH and SSVF.
 - Where Veterans are not eligible for any Veteran-specific housing resources or there are no available Veteran-specific housing resources, Veterans will be assessed for available units using the CE process and prioritized first in case of a tie with a non-veteran.
 - Providers will add the Veteran to the dedicated Veteran Community Queue.
 - A monthly Veteran CoC-Wide Case Conferencing with Veteran Representatives will occur to review the list to ensure that all Veterans have been appropriately referred and served.
- **Domestic Violence Victims:** People fleeing or attempting to flee domestic violence and victims of trafficking must have safe and confidential access to the CE process and victim services, including access to the comparable process used by victim services providers,

as applicable, and immediate access to emergency services such as domestic violence hotlines and shelter according to [HUD CE Notice Section II.B.10](#). Domestic Violence victims is inclusive of victims of domestic violence, dating violence, dating violence, sexual assault, stalking and victims of trafficking. All providers need to remember that victims of DV are not required to have identifying information entered into HMIS in order to receive services, and providers must express this option to potential program participants. Victim service providers funded by CoC and ESG program funds are not required to use the CoC's CE process but CoC and ESG funded victim service providers can do so. Or, victim service providers may use an alternative CE process for victims of domestic violence, dating violence, sexual assault, and stalking. However, if an alternative CE process is used for victims of domestic violence, dating violence, sexual assault and stalking, that alternative process must meet HUD's minimum CES requirements. Refer to Domestic Violence Addendum for additional information.

- **LGBTQ2+:** In accordance with Federal regulation and recent Federal guidance, individuals shall not be discriminated against due to sex, perceived or actual gender identify or sexual orientation. Providers will offer services in safe and culturally competent ways. KSHC will ensure that agencies have the opportunity to train their case managers over HUD's Equal Access rule titled "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity" located [here](#).

Each region may determine that there are additional special needs populations within their geographical location.

Tiebreakers

In the event that two or more homeless households within the same geographic area are identically prioritized for the next available unit, and each household is also eligible for that unit, the KS BoS CoC selects the household that with longest history of homelessness. If this does not break the tie, then the unit will be provided to the household that presented first for assistance.

Referral & List Management

The KS BoS CoC uses the CES to provide a uniform and coordinated referral process for all beds, units, and services available at participating programs within the KS BoS CoC's geographic area for referral to housing and services. Participating programs in the CES establishes that the CES is the only referral source from which to consider filling vacancies in housing and/or services funded by CoC and ESG programs. [[HUD CE Notice: Section II.B](#)]

CoC and programs participating in the CES cannot screen potential program participants out for assistance based on perceived barriers related to housing or services. [[HUD CE Notice: Section II.B.3](#)]

Providing Referrals

The CES team will collaborate on providing referrals in Clarity Human Services from the CES list to participating agencies when the agencies determine there is an opening in a program. To

ensure rapid referrals and program intake, if an agency is aware that they will be requesting a referral, because program participants will be exiting the program, the program is new, or the program will be expanding capacity, they should notify the CES team immediately.

- Once an opening is available, the CES team will have three (3) business days to provide the agency with a referral and will assist with connecting the referred household being referred to the agency to the maximum extent practical.
- The agency must attempt to make contact with the referred household within three (3) business days of receiving a referral, and notify the CES team immediately if the agency is unable to reach the referred household after four separate attempts using all available methods (e.g. by phone, text, email, and in person attempt at last known address).
- If the agency is unable to reach the household, the CES team will attempt to contact for three (3) business days. If the CES team is unable to establish contact after three (3) business days, the CES team will issue a new referral within three business days.

The KS BoS CoC covers 101 counties within the state of Kansas and has designated 8 regions within the state. These regions will manage their own regional CES list and provide referrals within their independent regions in order to avoid forcing households to travel or move long distances to be served. Each region may decide to customize the CES list to align with eligibility requirements from the specific programs in that region. (i.e., funding only allows the program to serve households within a specific city so a city column is added for all participants.) A statewide CES List will be comprised of households that are willing to be referred outside of the region they were assessed in.

Determining Program Eligibility

The agency must provide the referred household with a specified date, time and location (virtual meetings acceptable) for all meetings pertaining to eligibility determination and program intake that accommodate the applicant's schedule and ability. HUD funded programs will determine program eligibility solely on HUD eligibility requirements and may not add additional eligibility requirements.

- Agencies have ten (10) business days to accept or deny a referral based on program eligibility. An extension may be provided by the CES team on a case-by-case basis.
- If the referred household fails to attend four (4) scheduled meetings within a two-week timeframe, the agency must document the missed meetings and immediately inform the CES team. A new referral will be provided to the agency within three (3) business days.

If a CES participant is denied by an agency, they will not lose their place on the list and they will be referred for next available opening.

Denial of Referrals

All denial of CES referrals must be entered into Clarity. Within the Referral, agencies can change the Status of the referral to "Denied" which will provide the following options:

- Send to Community Queue

- Agencies should select “Yes” if the household remains homeless and continues to actively seek housing resources from the CoC.
- Agencies should select “No” if the household is no longer homeless and/or no longer seeks housing resources from the CoC.
- Denied By Type
 - Agencies should select “Provider” or “Client” depending on which entity initiated the denial.
- Denied Reason
 - The following options are available to choose from:
 - Lack of Eligibility
 - Full Capacity/No availability
 - Client out of jurisdiction
 - Client previously received services
 - Needs could not be met by program
 - Disagreement with rules
 - Client refused services
 - Client did not show up or call
 - Self Resolved - Client Housed
 - Falsification of Documentation

Safety Concerns

Agencies may deny households when there are safety concerns in working with agency staff or program participants. Agencies will mark these under “disagreement with rules” and provide a description in the comment section.

Transitional Housing List Management

For Transitional Housing participants that maintain their homeless situation while enrolled in a Transitional Housing program, the following factors will be considered in the CES List Management:

- TH participants that may want to be referred to RRH or PSH can stay on the CES List for referrals.
- TH participants on the CES List will not be required to be reassessed after one year instead they will maintain the VI-SPDAT and score that they had at the time of enrollment.
- Households that are experiencing literal homelessness or fleeing domestic violence are prioritized higher than TH participants that are stably housed in TH.

CES List Inactivation

A CES participant may be inactivated on the CES list if there is no contact, after several continued, documented efforts to locate and communicate with a CES participant, with no response after 90 days. The CES team may determine an exception to this on a case-by-case basis. CES list inactivation will not delete the CES assessment record, and it can be reactivated once contact is reestablished. While the CES participant is inactivated, they maintain their place on the CES list, but they will be skipped until they become active again. The participant may re-enter the CES in the future, without preconditions or retribution. In Clarity Human Services, the Check In button will reset the count if there has been contact.

Participant Autonomy During Referral

The KS BoS CoC incorporates a person-centered approach during the referral process. A person-centered approach includes:

- Participant choice in decisions such as location and type of housing, level and type of services, and other program characteristics, including assessment processes that provide options and recommendations that guide and inform participant choice, as opposed to rigid decisions about what the household needs.
- Clear expectations concerning where participants are being referred, entry requirements, and services provided.

CES Regional Plan

Each region can create an additional Coordinated Entry System Regional Plan to clarify their specific access model, target populations or specific procedures that do not conflict with these policies and procedures.

Data Management

The KS BoS CoC has designated Bitfocus Clarity Human Services to manage the Homeless Management Information System (HMIS) as the data system that stores CES data including documenting assessments/referrals and the data management, communication, and performance tracking platform for CES.

HMIS Access

The Coordinated Entry System is hosted with Clarity for direct data entry, enrollments, assessments and referrals. Therefore, end users must gain access to HMIS and access to HMIS is guided by the HMIS Policies and Procedures located at [here](#). At a minimum, HMIS end users will need to sign an agency/user agreements and complete HMIS training.

Non-HMIS Access Points, such as DV providers or non-service provider agencies, may submit paper VI-SPDATs to KSHC at 2001 Haskell Ave Lawrence, KS, email at ces@kshomeless.com or email it to that region's Regional Coordinator (contact information located here)

Match Making

HMIS/CES System Administrators can make system wide changes, change individual records and assist agencies with fixing data errors. The following entities have access to match making ability:

- HMIS System Administrator
- CES Lead Agency
- HMIS Chair

CES Linkages



VI-SPDAT ➡ Add to Community Queue ➡ CES Referral Sent ➡ Program Enrollment

Beginning on January 1, 2022, all CES participating agencies must have 95% of households enrolled with proper linkage.

Privacy Protections

This data system ensures adequate privacy protections of all participant information per HUD's [HMIS Data Standards](#). All persons who have access to this information must have signed confidentiality agreements in place and agree not to share the information, except as authorized by participants. All persons with access to the HMIS system must follow the HMIS Policies and Procedures located [here](#).

Each CES participant will be required to sign the HMIS/Coordinated Entry Release of Information form that will obtain participant consent to share and store participant information for purposes of assessing and referring participants through CES. [[HUD CE Notice: Section II.B.12](#)]

The HMIS/Coordinated Entry Release of Information form will have at a minimum the following information:

- Participating in the Coordinated Entry process is voluntary.
- Collected information will be sent to authorized agencies for the purpose of furthering services and housing assistance.
- Participants can request to have their information removed from the database at any time.
- Participation or lack of participation in CES does not affect a person's ability to access resources and services from the Access Point agency.
- Households who do not consent to have their identifying information stored in the HMIS system may have their identifying information removed or not entered into the system.
- The CES does not require disclosure of specific disabilities or diagnosis and that specific diagnosis or disability information may only be obtained for purposes of determining program eligibility to make appropriate referrals. [[HUD CE Notice: Section II.B.12.f](#)]

Coordinated Entry Evaluation

HUD requires Coordinated Entry evaluations to occur on an annual basis with a focus on the quality and effectiveness of the entire Coordinated Entry System, including intake, assessment, prioritization and referral processes. This evaluation will create an opportunity to modify the CES operations to better achieve positive outcomes.

Establishing a Coordinated Entry Evaluation Plan

The CES team and the CEC will develop an evaluation plan that will complete the following:

- Determine which aspects of the effectiveness of its system will be measured.
- Determine which aspects of the process will be evaluated for fidelity to Coordinated Entry policies and procedures and HUD's CES requirements.
- Determine how to gather data to track the selected measures, incorporating in the evaluation process the required stakeholders, at a minimum.

- Determine whether and how the CoC uses evaluation results to inform other aspects of system planning and monitoring, including evaluating whether the CoC has too much or too little of certain housing and supportive services resources overall and for specific subpopulations (e.g., veterans, youth, chronic, families, etc.).
- Coordination with partners (e.g., ESG recipients, SSVF recipients, etc.) so data are collected consistently across programs, to make sure evaluations are thorough and coordinated.

The evaluation plan will consist of the following reviews:

1. **Compliance Review:** This review will determine if the implementation and operation of the CES is in compliance with HUD’s requirements for CE as stated by the [Coordinated Entry Notice](#), the [Prioritization Notice](#), the [Coordinated Entry Policy Brief](#), the [CoC Program interim rule](#), the [ESG interim rule](#), [HUD Equal Access rule](#) and any future requirements established by HUD.
2. **Effectiveness Review:** This review will determine how effective the CE process is in connecting households experiencing homelessness to appropriate referrals such as system need, time to referral, referral appropriateness and referral outcomes.
3. **Process Review:** This review will focus on how the Coordinated Entry process has been implemented and whether it is currently operating in accordance with the KS BoS CoC’s established policies and procedures.

The CES team and the CEC may utilize the following information and/or methods to complete a comprehensive evaluation.

- [Coordinated Entry Process Self-Assessment tool](#)
- [Coordinated Entry Management and Data Guide](#)
- HMIS and CES data to determine system performance measures and other evaluation criteria
- Solicit feedback to influence updates to CES policies and procedures from participating programs and program participants as required by [HUD CE Notice Section II.B.15](#) which will ensure privacy protections for this evaluation according to [HUD CE Notice Section II.B.12](#).

Amendment

The CEC shall be responsible for the revision and review of the CES Policies & Procedures. The CEC will submit the final draft of the revised CES Policies and Procedures to the CoC Steering Committee for final approval. The revision process will be completed at least once annually, and anyone who is interested in submitting suggestions for revisions to these policies and procedures should submit them to coordinated_entry@kshomeless.com.

Domestic Violence Addendum

Privacy and Safety

All staff conducting assessments at DV-dedicated and non-DV-dedicated access points will be trained on the complex dynamics of domestic violence, trauma informed care, privacy and confidentiality, and safety planning, including how to handle emergency situations. All access points will screen all incoming households to determine whether they are DV survivors at risk of harm.

Victim Service Providers

1. Agencies which are primarily for survivors of domestic violence, victim service providers (VSPs), are prohibited from contributing personally identifiable information (PII) into a Homeless Management Information System (HMIS).
 - a. The Kansas Balance of State Continuum of Care (KS BoS CoC) highly recommends that all VSPs within the KS BoS CoC geographic area utilize the Bitfocus Human Clarity System (Clarity) for Coordinated Entry to ensure households have access to the same services and resources as non-victim households.
 - b. VSPs may decide to participate with Coordinated Entry System either through an established manual process or through Bitfocus Human Clarity System with additional safeguards to protect PII.
2. When utilizing CES through Clarity, VSPs must ensure that all households experiencing homelessness are entered into Clarity as de-identified. De-identification is listed as an option on a consent form. The VSP and head of household must select this option and sign. Therefore, VSPs are prohibited from entering PII into Clarity at any time for any reason.
 - a. VSPs do not intake or exit households experiencing homelessness in the Clarity system. These items should be entered within a comparable database with the capability to generate aggregate data for inclusion reports.
 - b. The participating VSPs will conduct a revised VI-SPDAT which includes the minimum information necessary to determine eligibility and prioritization and it will specifically exclude personally identifying information, including: name, date of birth, social security number, and last permanent address. The VSP completing the VI-SPDAT will include the name of the agency, the appropriate staff contact, and an alternate staff contact. All communication about the assessment and any possible referrals/placements will be conducted through the VSP to maintain client confidentiality. An internally generated ID number will be entered into Clarity that the agency can associate with the client, but that cannot otherwise be identified with the client. Coordinated Entry staff will use this number to identify the client when communicating with the VSP.

If a DV survivor is already on the Coordinated Entry list because they have undergone a VI-SPDAT with their abuser, the survivor should be given the option to be re-assessed without the abuser.

Non-Victim Service Providers

When a non-victim service provider becomes aware that a household being served is fleeing or attempting to flee violence, the provider must offer them the choice of:

- a. An immediate offer of a warm handoff to a VSP for services, including safety planning and the VI-SPDAT; or
- b. Continuing to receive the VI-SPDAT from the non-victim service provider who will enter the household's information into the Coordinated Entry System into Clarity without PII and offer or refer to safety planning, limited services, and/or connection with a DV advocate or
- c. Continuing to receive the VI-SPDAT from the non-victim service provider who will enter the household into the Coordinated Entry System in Clarity with PII and offer or refer to safety planning, limited services, and/or connection with a DV advocate.

Duplication of Services

All providers with access to Clarity working with a client where DV is now or has later been identified, must determine if an existing record for each household has already been established:

- a. If there is no existing Clarity record for the household, the provider must explain the Release of Information and offer the DV household the option to have their information entered into Clarity de-identified. The provider should explain the process for housing referrals if entered without PII.
 - i. Referral would be processed through the service provider entering the record, who would then attempt to locate the client if a referral is made.
- b. If there is an existing Clarity record for the household that includes the household's personal identifying information, offer the household the option to make this existing profile de-identified. Non-victim service providers must submit a HMIS Help Desk ticket and provide the Unique Identifier within the Profile screen of the client, as part of the request to de-identify the client. i.e., "Please de-identify client 7FFB973F0".