

Washington Balance of State Coordinated Entry Guidelines

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1 Introduction

1.1 Coordinated Entry Guidelines for Washington Balance of State

In January 2017, HUD released new requirements for coordinated entry (CE) systems (CPD-17-01).

The Washington Balance of State CE Guidelines incorporate some of the requirements of CPD-17-01 and requirements and clarifications specific to systems funded by the Washington State Department of Commerce (Commerce).

In the Washington Balance of State CE Guidelines, *crisis response system* refers to all of the services and housing available in the lead Consolidated Homeless Grant (CHG) grantee's jurisdiction (i.e. county) for households who are experiencing a housing crisis. A county CE system incorporates all of the resources in their crisis response system.

In addition to this document, Commerce encourages review of the following published guidance:

CE Policy Brief

CE Core Elements

CE Management and Data Guide

Office of Homeless Youth Recommendations for Youth and Young Adults

Youth Specific FAQs for CE

Incorporating DV Providers

1.2 Purpose

The purpose of these guidelines is to promote CE processes in the Balance of State CoC that serve and build power for people disproportionately impacted by homelessness, and to ensure homelessness for all households is rare, brief and one time.

CE promotes system-wide coordination for a more effective and strategic response to homelessness. CE helps a crisis-response system transition from project-focused to person-focused. Through CE, systems can monitor an inventory of housing resources and prioritize households for available services appropriately. Implementation of CE also provides crisis response systems with comprehensive data for planning and resource allocation.

In practice, CE aims to guide households experiencing a housing crisis through the crisis response system by providing access to the most appropriate housing through a standardized assessment, prioritization and referral process.

If your community has difficulties in implementing any of the CE requirements or best practices, please contact the Coordinated Entry Performance Specialist, Andrea Arteaga andrea.arteaga@commerce.wa.gov for support.

1.3 Policies and Procedures

Each section ends with a summary of required CE policies and procedures. A template policy and procedure is located in Appendix 11.3.

POLICY: Describes a management decision.

PROCEDURE: Lists the steps a team takes to complete an action.

All CE policies and procedures required in this document must be publicly available, by either posting documents on a website or making documents available upon request.

2 Governance Structure

The Washington Balance of State (BoS) CE System has designated a governance structure that includes the following entities. Listed below are the responsibilities of each entity. The BoS Steering Committee adopted this governance structure on July 2, 2020. The BoS Steering Committee welcomes continuous input and feedback and can adopt changes as necessary based on that feedback.

1. Community¹ CE Governing Entity

The structure of The Community CE Governing Entity may be different in each community. It could be a board, a CE Lead Agency, the CHG Lead Grantee, etc. The Community CE Governing Entity will decide on its structure, decision-making process, advisory processes, etc.

The CHG Lead Grantee is ultimately responsible for ensuring that CE is operational at the community level. The CHG Lead Grantee has final approval for community based CE decisions. The CHG Lead Grantee must ensure that the Community CE Governing Entity accomplishes the following responsibilities, which may be delegated:

- Develops marketing/advertising plan
- Ensures development of community based CE training to CE staff/assessors
 - Intake, assessment, local processes
- Provides oversight of community CE processes
- Community level policy development
- Community level policy approval and oversight
- Establishes community CE participation expectations in addition to CoC participation requirements
- Community Engagement: establishes and maintains buy-in from entire crisis response system, and continually gather feedback from the crisis response system to inform policies and procedures
 - See section 2.1 Composition
- Planning and Change Management: facilitates system design/re-design processes, with final approval from Commerce

¹ Community means the geographical area in which you are contractually obligated to cover. For example, a county or in some cases, neighboring counties combined to make up a region.

2. Community CE Access Point Organizations

- Day to Day work flow (intake, assessment and referral processes)
- Implements marketing/advertising plan developed by Community CE Governing Entity

3. BoS CoC CE Subcommittee

- Determines data collection and data quality expectations for the BoS CE process
- Provides feedback/input for annual CE evaluation
- As part of annual CE evaluation, collects feedback from people with lived experience with homelessness and crisis response system involvement
- Makes recommendations on CoC level policy development

4. BoS CoC Steering Committee

CoC level policy approval and oversight

5. Department of Commerce

- Develops and delivers CE 101 Standard Onboarding training to CE staff/assessors
- Provides technical assistance and guidance around CE best practices and implementation of CE guidelines
- Conducts monitoring of community CE process (compliance with CE guidelines)
 - Monitoring plans prioritize communities at high-risk of non-compliance as determined by risk assessments.
 - Monitoring may result in community-level policy enforcement and technical assistance plans, in partnership with The Community CE Governing Entity. If the CE system is still out of compliance after the technical assistance, Commerce may move the Lead CHG Grantee into a probationary period. Consequences of non-compliance are outlined in the CHG terms and conditions.
 - Monitoring will include a review of the intake, assessment and referral processes, in partnership with all projects participating in the CE system.
- Provides final approval for data collection and data quality expectations for CE process
- Administers the Homeless Management Information System (HMIS)
- CoC level policy development and origination information
 - Assessment of HUD Compliance
- Establishes high-level participation requirements for participants at the community level
- Provides guidance and final approval on significant system design/re-design processes
- Plans and performs CE evaluation (CoC level) every 2 years and identifies policy and process improvements. CE Evaluation must include:
 - Collection of information and feedback from participating projects and project participants (e.g. survey, focus groups, involvement in meetings, etc.)
 - Description of how project participants are selected to provide feedback
 - Documentation of adequate privacy protections of all household information collected throughout the evaluation process
 - Description of the process by which the evaluation is used to implement updates to existing policies and procedures
 - Documentation of the evaluation results

2.1 Governance Composition

2.1.1 BoS CE Subcommittee Composition

The membership of the BoS CE Subcommittee must reflect a balance of people with lived experience of homelessness and homeless Crisis Response System representatives. In order to have meaningful representation, the BoS CE Subcommittee should have 30 percent, but no less than three, of its membership be people with experience of homelessness. Additionally, the BoS CE Subcommittee should be demographically representative of the homeless population particularly in terms of race, ethnicity, gender identity, sexual orientation and geographic location.

Participants should have a basic understanding of what CE is. At a minimum, participants should review the documents linked in section 1.1.

Note: This moves representation of people with lived experience from the community level to the CoC level. Commerce will assist in recruiting and compensating people with lived experience of homelessness for BoS CE Subcommittee participation.

2.2.1 Community CE Governing Entity Composition

The structure of The Community CE Governing Entity may be different in each community. It could be a board, a CE Lead Agency, the CHG Lead Grantee, etc. The Community CE Governing Entity will decide on its structure, decision-making process, advisory processes, etc.

At a minimum, community level CE governance requires participation of:

- Lead CHG Grantee
- CE Lead Agency or Access Point
- Victim service providers
 - Victim services providers are not required to participate in CE; however, they must be involved in the development of CE processes for survivors. If the Community CE governing entity needs support to engage victim service providers, please contact the Coordinated Entry Performance Specialist.

In order to establish and maintain buy-in from the community, The Community CE Governing Entity must engage the following groups:

- Representatives of organizations that refer to from the CE system on a regular basis.
 - For example: behavioral, physical, and mental health organizations, public housing agencies, affordable housing operators, VA Centers, Department of Social and Health Services Community Services Offices, McKinney Vento Liaisons, early education and early childhood care providers, hospitals, correctional facilities, workforce investment programs.
- Representatives of organizations that accept referrals from the CE system on a regular basis.
 - For example: public housing agencies, affordable housing operators, agencies that provide rent assistance, agencies that operate long-term and night-by-night shelters.
- Representatives of each Community CE Access Point Organization.

2.3.1 Community Engagement

The Community CE governing entity must make a meaningful effort² to elicit the partnership and/or advice of the local Tribes and Nations, and by and for/culturally specific organizations. These important partners have not typically been involved in the development or implementation of CE processes.

- Tribes and Nations
 - When reaching out to Tribes and Nations, it is important to know that Tribes are sovereign nations. This means that working with a Tribe is like working with another country, not another county.
 - A good first step in connecting with your local Tribes or Nations is to find your staff equivalent and reach out to them directly. To find your housing counterpart, go to the Governor's Office of Indian Affairs (GOIA) Tribal Directory | GOIA (wa.gov) where you can find federally and non-federally recognized Tribes and Nations. The directory provides information on which counties the Tribe or Nation may cover and links to the Tribe or Nation's website. Research the Tribes or Nations website to find a governmental department or program similar to yours.
 - The GOIA website does provide the Tribal Chair contact information. In most cases, this is the Tribal Chairperson. As stated above, it is more appropriate for you to contact your staff equivalent, not the Chairperson.
 - When communicating with Tribes and Nations, use language of partnership. Avoid phrases or insinuations that you want "to help" or "to assist" the Tribe or Nation. Focus on partnership and collaboration.
 - Do research on local Tribes and Nations. Learn about their history, current events and Tribal enterprises. Most Tribes and Nations have comprehensive websites, which often include local newsletters and calendars of events.
 - Commerce can provide technical assistance regarding collaborating with Tribes and Nations.
- By and for/culturally specific organizations
 - By and for/ culturally specific organizations are organizations that serve and are substantially governed by marginalized populations.
 - ESHB 1277 requires Commerce to provide a list of organizations to eligible grantees, counties or cities that make the request.
 - Commerce can provide technical assistance regarding collaborating with local by and for/culturally specific organizations.

These entities must be engaged in a thoughtful and meaningful way. The involvement of these entities in the development of equitable CE processes in your community is crucial in moving forward with changes that create access for disproportionately impacted homeless people. The intention behind involving these entities is not to check a box, but to make meaningful changes to your community's response to homelessness.

If you need support in developing an engagement plan, please reach out to the Coordinated Entry Performance Specialist.

² Meaningful effort means that the Community CE governing entity has invited the representative to formally collaborate in CE process development; this can be through email, letters, etc. How this information is documented is to be decided by the Community CE governing entity.

2.4.1 Compensation

If they are not otherwise compensated by their employer to participate, the governing body members of both the BoS CE Subcommittee and the Community CE governing body must offer compensation for their time

3 Victim Services

This section intends to provide a full explanation of the role of victim service providers and best practices for survivors of violence and people fleeing violence going through CE.

Survivors of violence and people fleeing violence are people who have experienced, or are currently experiencing, domestic violence, dating violence, sexual assault, stalking, trafficking or other dangerous or life-threatening conditions that relate to violence against an individual or a family member. Currently fleeing violence means fleeing, or attempting to flee the situation or afraid to return to their primary nighttime residence.

Please see also section 6.2 Subpopulation Prioritization.

Regardless of funding source, victim service providers (VSP) ³ are not required to participate in CE as an access point or by accepting referrals.

Do not publicize the address of any confidential VSP project.

3.1 Safe CE Processes for People Fleeing Violence

The CE community governing entity must collaborate with all local VSPs to develop and implement a safe process for households fleeing violence or attempting to flee violence. If your community is having a difficult time collaborating with your local VSP, please reach out to the Coordinated Entry Performance Specialist for support.

Communities should follow the guidance of <u>Safe Housing Partnerships</u>. The CE process for people fleeing violence must:

- Be built on shared tools and standards, and not reliant upon shared databases or other structures that inherently expose people fleeing violence to unnecessary danger.
- Meaningfully and significantly, involve VSP in their design and implementation.
- Proactively address safety and privacy concerns.
- Adhere to confidentiality and safety policies with regard to record keeping or sharing and physical locations.

³ Victim Service providers are organizations whose primary mission is to provide direct services (which may include shelter and/or housing services) to survivors of domestic violence, sexual assault, stalking, trafficking and/or other crimes. While Washington State CE Guidelines do not require victim service providers to participate in CE, it should be noted that projects funded by ESG and/or CoC must meet HUD CE requirements. A list of Washington Domestic Violence programs can be found here: https://wscadv.org/washington-domestic-violence-programs/. You can find a list of Washington Accredited Community Sexual Assault Programs here: http://www.wcsap.org/find-help.

- Allow direct, immediate access to safe housing by including a question at the beginning of the
 interaction that allows clients to safely disclose danger/fear and be referred to the appropriate
 VSP (if so chosen.)
- Do not enter the personally identifying information of people fleeing violence in HMIS.

Additional information on how to make CE better for survivors: <u>Transforming Our Coordinated Entry Systems to Increase Survivors' Access to Housing Options (safehousingpartnerships.org)</u>

3.2 Separate CE Processes for People Fleeing Violence

Communities can establish a comparable CE process including different access points, screening and assessment tools for people fleeing violence. If a community chooses to create a separate CE process for people fleeing violence, including separate access points, the process must:

- Be developed in coordination with local VSPs; and
- Adhere to the same requirements as the broader CE process.

Some considerations for establishing a parallel CE process include:

- A comparable VSP CE process can provide survivors with safe and separate access point(s) designed to specifically address their needs relating to violence.
- VSPs can manage their program's assessment and intake via the homeless CE, which can alleviate some of the challenges around safety planning and trauma-informed care.
- VSPs can help survivors obtain assistance through the homeless services system, and the parallel system can have one point of entry or several.

3.3 Commerce Consultation

The Department of Commerce must consult and incorporate guidance from the <u>Washington State</u> <u>Coalition Against Domestic Violence</u> when developing CoC level policies and procedures to ensure accessibility, safety and confidentiality for households who are fleeing, or attempting to flee, violence (domestic violence, dating violence, sexual assault, stalking, or trafficking.)

4 CE Participation

Projects should refer to funding guidelines to determine whether participation in CE is required. The following fund sources are typically required to participate in CE, but other fund sources may also be included:

- Consolidated Homeless Grant (CHG), includes Housing and Essential Needs (HEN)
- Federal Emergency Solutions Grant (ESG)
- Federal Continuum of Care (CoC) Program
- Federal HOME Tenant-Based Rental Assistance (TBRA)

If the Commerce grantee is a county government, homeless housing projects funded by local homeless housing surcharge revenue (local document recording fees) must also participate in the CE system.

Projects that are required to participate in CE must act as an access point or by accepting referrals. Participating projects accepting referrals must fill openings exclusively through the CE system and eliminate all side doors.

Additionally, all projects participating in CE must adopt and follow all CE policies and procedures.

The funder is responsible for ensuring that grantees are participating in CE. If a grantee is not participating, it is up to the funder to enforce participation and take further action if necessary.

Recommended—All homeless housing and homelessness prevention projects within the crisis response system participate in the CE system.

Exception—Victim service providers and emergency shelters are not required to participate as an access point or by accepting referrals. However, it is highly recommended to develop a meaningful partnership.

Whether or not an emergency shelter should participate in the CE system as an access point or as accepting referrals, will depend on factors such as shelter capacity and the type of services offered at the shelter. For example, drop-in shelters⁴ may not participate in the CE system due to the immediacy and urgency of the services provided. On the other hand, continuous-stay shelters⁵ may participate in order to prioritize beds in accordance with the CE system process.

POLICY—Local identification of which shelters will participate in CE.

5 Accessing the CE System

CE must be available to all households regardless of actual or perceived race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity, marital status and U.S. residency status.

5.1 High Accessibility

The CE system must be highly accessible, and adhere to state, federal and local anti-discrimination laws.

The CE system makes getting help as easily accessible and user friendly as possible. One that tries to minimize barriers such as paperwork, wait lists, eligibility requirements, as well as, physical and staff-related characteristics that can stand in the way of people getting their needs met. It is an entry point for a variety of services and approaches.

Physical and staff related characteristics that stand in the way of accessible services include:

- Staff that is not properly trained
- Culturally incompetent services
- No ramps available
- Not on a bus route or difficult to get to location

⁴ Drop-in shelters offer night-by-night living arrangements that allow households to enter and exit on an irregular or daily basis.

⁵ Continuous-stay shelters offer living arrangements where households have a room or bed assigned to them throughout the duration of their stay.

The CE system must be highly accessible, and adhere to state, federal, and local anti-discrimination laws. Do not use the following criteria to screen out households:

- Having too little or no income
- Having poor credit or financial history
- Having poor or lack of rental history
- Having involvement with the criminal justice system
- Having active or history of alcohol and/or substance use
- Having a history of victimization
 - Information about a person's history of victimization shall be kept confidential and may not be used against them
 - CE processes may not require "proof" or documentation to determine whether a person has a history of victimization or not
- The type or extent of disability-related services or supports that are needed
- Previous system involvement
 - No turning away of a person regardless of the number of times they have accessed services.
 - Lacking ID
- Lacking proof of U.S. Residency Status⁶
- Other behaviors perceived as indicating a lack of "housing readiness," including perceived resistance to receiving services/"bad attitude" or lack of ability to demonstrate they will be successful on the program

POLICY: CE System Access Criteria

PROCEDURE: ensuring accessibility for all households

5.2 Accessibility for People with Disabilities

CE must develop and implement the following accessibility components:

- Physical access points must be accessible for people who use wheelchairs or mobility devices, and must provide reasonable accommodations as needed (e.g. a different access point, telephone number, or online access.) Policies and procedures must include steps taken to ensure physical accessibility.
- To avoid forcing persons in a housing crisis to travel or move long distances to be served.
 The CE system must ensure accessibility throughout its geographic jurisdiction and must offer variation to the assessment process that includes offering phone or electronic assessments and utilizing mobile outreach to administer assessments.

⁶ Immigration Status and Housing Discrimination Frequently Asked Questions.

All access points must ensure effective communication with individuals with disabilities⁷, including people who are blind, vision impaired, d/deaf, deaf/blind, hard of Hearing, etc.

POLICY: CE System Accessibility

PROCEDURE: Physical accessibility and reasonable accommodations **PROCEDURE**: Effective communication with individuals with disabilities

5.3 Language Access

As the front door to homeless system services, it is critical that CE processes be fully available to all community members, including people who have limited English proficiency (LEP.)

5.3.1 Plain Talk

Use plain talk to write CE system materials. In <u>plain talk</u>, messages are clear, concise and visually easy to read. They contain common words, rather than jargon, acronyms or unnecessary legal language.

5.3.2 Language Access Plans

CE systems must develop a language access plan by **July 1, 2022**. A language access plan will ensure that the CE system provides high quality and appropriate language services.

A language access plan (LAP) is a document that outlines the steps that the CE system will take to ensure effective communication with people who are non-English speaking or have limited English proficiency (LEP.) It spells out how the CE system will provide services to people who have LEP. The LAP provides language tailored to the community, but all LAPs should include the following components:

Needs Assessment: information about the needs of current and prospective clients whose preferred spoken and written language is a language other than English, including the number of individuals with LEP, places in which clients with limited English proficiency interact with the CE system and ways in which individuals interact with the CE system.

- 1. **Language Services**: description of the types of services the CE system will provide, such as in-person interpretation and remote interpretation, description of materials needing translation and the languages used.
- 2. **Notices**: description of how the CE system will let its clients know about the availability of services.
- 3. **Training**: description of how the CE system will train staff on its policies and procedures for providing language assistance services, including who and how often.

⁷ Please follow <u>ADA Title III Regulation 28 CFR Part 36</u>: (1) Qualified interpreters, note takers, computer-aided transcription services, written materials, telephone handset amplifiers, assistive listening devices, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDD's), videotext displays, or other effective methods of making aurally delivered materials available to individuals with hearing impairments;(2) Qualified readers, taped texts, audio recordings, Braille materials, large print materials, or other effective methods of making visually delivered materials available to individuals with visual impairments; (3) Acquisition or modification of equipment or devices; and (4) Other similar services and actions.

4. **Evaluation**: plan for when and how the CE system will monitor and update its plan, policies and procedures to ensure that needs are met and that there is a framework for continuous quality improvement.

Please note that **July 1, 2022,** is the completion date of the LAP **and can include implementation milestones that extend beyond that date.**

Commerce will assist with language access by translating any Commerce required public facing forms into multiple languages and can assist grantees with translation of other written materials as requested.

Please refer to the following resources to aid in the development of this plan:

- HUD's LEP FAQs: https://www.hud.gov/program offices/fair housing equal opp/promotingfh/lep-faq#q6
- HUD's Housing Counseling LEP Toolkit: https://files.hudexchange.info/resources/documents/Housing-Counseling-Limited-English-Proficiency-Toolkit.pdf
- National Latino Network's LAP Template: https://nationallatinonetwork.org/lep-toolkit-tools/language-access-plan-template
- Free online workshop "How to write a LAP":
 Resources | Fhorc (fhorconference.com)

5.4 Marketing

Marketing refers to how people learn where to go in a housing crisis. This may include, but is not limited to, written materials such as flyers and brochures, online such as websites and social media, outreach to relevant partners, community education and street outreach.

When marketing in any manner, the following information should be included:

- Access point hours of operation
- Languages spoken in house and/or language line availability
- How CE is available, such as by phone, online portal, mobile outreach, etc.

The Community CE Governing Entity implemented by the CE access points must develop the following marketing components that will be:

- Develop a marketing strategy to ensure the CE system is available to all people regardless of actual or perceived race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity, marital status or U.S. residency status. This marketing strategy must be included in policies and procedures.
- Develop marketing strategy to reach <u>households least likely to apply</u>⁸. This should include immigrants, people of color, LGBTQ+, people who are undocumented, etc.
- Advertisement of access points to all mainstream systems of care, and other community partners within the entire CE system's jurisdiction.
- IF the CE access point has the ability to communicate with non-English speaking people: Marketing materials like flyers, brochures, and cards should be available in at least 3 of the

⁸ "Affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities" 24 CFR § 578.93 - Fair Housing and Equal Opportunity

top languages spoken in your community. This will likely be English, Spanish, and the third language will vary by location. *Please see section 5.3 Language Access for more information on how to develop a language access plan*.

- CE marketing materials must be written in <u>plain talk</u>:
 - Plain Talk messages are clear, concise and visually easy to read. They contain common words, rather than jargon, acronyms or unnecessary legal language.

POLICY: Marketing Strategy

PROCEDURE: Marketing to all households

PROCEDURE: Marketing to households least likely to apply

5.4.1 Emergency Services

The CE system must ensure people are able to obtain information about how to access emergency services outside of the CE operating hours. Emergency services may include domestic violence and emergency services hotlines, drop-in service programs, emergency shelters, including domestic violence shelters and other short-term crisis residential programs. Procedures must describe how people obtain information about accessing emergency services outside of the CE operating hours.

This should include:

- Voicemail recordings
- Website/social media
- Signage on doors
- Listed on marketing materials

PROCEDURE: Access to emergency services

5.5 Access Points

The number of access points the CE system designates will depend on the capacity and geography of the crisis response system. The purpose of designating multiple access points is to ensure all people in the CE system's jurisdiction have equal access to the crisis response system.

When multiple access points exist within the CE system, each access point must:

- Provide equal access to emergency services.
- Use common assessment approaches and tools.
- Prioritize persons for available resources according to the CE system's prioritization policies and procedures.
- Be available to all people experiencing a housing crisis.

Exception: Separate and distinct access points may be designated for the subpopulations listed in 5.5.1.

5.5.1 Subpopulation Dedicated Access Points

The CE system designates separate and distinct access points for the following subpopulations:

- Households with children
- Individual adults (households without children)

- Households fleeing violence (domestic violence, dating violence, sexual assault, stalking, trafficking, or other dangerous or life-threatening conditions)
- Youth under the age of 18 and young adults up to age 24
- Households at-risk of homelessness
- By and for/culturally specific access points
- Tribal community access points
- HEN eligible households
- Veterans

Access points that do not assess certain populations must immediately refer those households to an appropriate CE access point. Procedures must include steps taken to ensure immediate and complete referral to the appropriate access point, meaning staff take steps beyond providing CE access point information to the household. A meaningful referral includes:

- Follow-up with household
- Communication with provider receiving referral
- Assisting household with transportation to an appropriate access point as needed

Households included in more than one population for which an access point is dedicated. They can choose whichever access point they want, so long as they qualify as a target population.

For more information on establishing youth specific access points see the Office of Homeless Youth's <u>Five Recommendations for Making Coordinated Entry Work for Homeless Youth and Young Adults.</u>

For more information on best practices for veterans and coordinated entry see: <u>VA Participation in Coordinated Entry: VA Guidance and Implementation Assessment Checklist - HUD Exchange</u>

PROCEDURE: Referrals to subpopulation designated access point

5.5.2 Street Outreach

Street outreach efforts⁹ must be linked to CE. Examples of approaches to link street outreach efforts to CE include designating street outreach as a defined access point, or training outreach staff to provide referrals to CE. Policies and procedures must describe how street outreach efforts are linked to CE.

POLICY: Linking Street Outreach Efforts **PROCEDURE**: Outreach staff CE role

5.5.3 Mobile Services

Communities should make CE as mobile as possible. Meeting people where they are, not only makes CE more physically accessible to those in need, it can also help support the development of trust by being in a space that may make a person feel safer. Additionally, collaborating with agencies that already work with marginalized communities is key in the development of a more trusting relationship.

Collaborate with street outreach teams (if street outreach is not already a part of CE.)

⁹ Street outreach projects should refer to their funding guidelines regarding required CE participation.

- Reach out to libraries, schools, jails, hospitals and other social service entities to come up
 with a schedule in which a CE assessor/intake person would physically be able to support
 those in a housing crisis.
- Station CE assessor/intake staff at any location where a person experiencing homelessness may frequent, such as a rest stop or park.

6 Prioritization of Policy & Process

The Community CE Governing Entity is responsible for establishing and implementing a system-wide prioritization policy.

CE must have a prioritization policy that describes who is considered in priority status. Prioritization identifies which households will receive accelerated assistance to available housing resources.

POLICY: Prioritization

6.1 Adults and Families Experiencing Homelessness

Required: At a minimum, criteria used by the CE system to determine prioritization for adults and families experiencing homelessness must include:

- Length of time homeless
- Unsheltered homelessness, including people fleeing violence¹⁰

These factors must *be included as part of* the prioritization process. The Community CE Governing Entity will decide additional prioritization factors, if any, and how each factor is weighted as part of the prioritization process. These factors are not required to hold more weight than other factors, or prioritized over other factors.

Note: chronic homelessness is no longer a required prioritization factor due to the unequitable nature of the definition. While removing this as a required prioritization factor, we understand this may be considered regarding program eligibility and the referral processes.

Additional Factors:

If your community has many adults and families experiencing homelessness, the following factors are recommended, so long as they are in line with your community's prioritization policy:

- Significant challenges to accessing housing in regard to protected class traits like race, gender, religion, age or sexual orientation
- Unmet health needs and/or significant challenges or functional impairments, including
 physical, mental, developmental, or behavioral health disabilities, regardless of time of
 disability, which require a significant level of support in order to maintain stability (Does not
 need to be documented or have a formal diagnosis)
- Risk of continued homelessness
- Threats to safety, including vulnerability to victimization, physical assault, trafficking or sex work

¹⁰ Unsheltered means currently living in a place not meant for habitation or fleeing domestic violence.

Communities have lots of flexibility when it comes to what additional factors they consider for prioritization of adults and families experiencing homelessness. For example, if your community has many disabled veterans, you may also consider adding factors such as veterans' status into your prioritization policy and process. Commerce recommends that communities consider the person's experience and how their safety or livelihood may be in jeopardy versus technical factors such as diagnoses or engagement with mainstream services such as mental health, as an example. Those considerations may leave out people who are disproportionately impacted by homelessness and/or may have been reluctant or unable to access those services.

6.2 Subpopulation Prioritization

The following subpopulations' prioritization are *not required* by the mandatory criteria identified in Section 1, but may have their own prioritization policy:

- Persons fleeing violence (domestic violence, dating violence, sexual assault, stalking, trafficking or other dangerous or life-threatening conditions)
- Youth under the age of 18 and young adults up to age 24
- Households at-risk of homelessness

If a community decides to have a separate prioritization process for the above subpopulations, the community must adopt the following for each subpopulation:

- **Persons fleeing violence:** the community must work with the local victim service provider to develop a prioritization process.
 - If the community is unable to connect with their local victim service provider, please reach out to the Coordinated Entry Performance Specialist for support. It is imperative that the CE system connect with victim service providers to develop a prioritization policy that meets the safety needs of survivors.
- Youth under the age of 18 and young adults: the community must work with young people with lived expertise to develop a prioritization process OR communities must use the Youth Homelessness Demonstration Program (YHDP) developed policy and tool.
 - O YHDP Policy:
 - The Balance of State Continuum of Care prioritizes youth and young adults with safety and health needs.
 - A points converter tool has been developed in order to ensure young people are not doing multiple assessments and for easy integration/matching to existing scores.
 - If your community would like to use the YHDP tool or points converter tool, please reach out to the Coordinated Entry Performance Specialist and they will be provided to you.
 - Working with young people means the process and tool is youth-created by five or more young people, for which they are compensated for their time and expertise.
 - This is achieved by working with your local Youth Action Board or panel of young people.
 - If your community is having difficulties with this, please reach out to the Coordinated Entry Performance Specialist for support.
- Households at risk of homelessness: Commerce acknowledges that many housing
 prevention programs have prioritization requirements built into funding or are not using CE.
 If your community has many adults and families at imminent risk of homelessness, the
 following factors are recommended:

- People who are at imminent risk of losing housing within 14 days,
- o People who are least likely to self-resolve their housing crisis, and
- People experiencing network impoverishment. <u>Network impoverishment</u> (pg. 24) is not just that the person is experiencing poverty — everyone they know is experiencing poverty as well.

POLICY: Subpopulation Specific Prioritization (if applicable)

7 Assessment

The assessment process is how CE gathers information about a household experiencing a housing crisis. Information gathered includes household needs, housing preferences, barriers to housing stability, and factors that might indicate vulnerability while homeless.

The assessment tool is the standardized tool used to collect information about a household. Examples of the information assessments collect, include household make up, housing history, income and benefits, employment history, legal history, health considerations, and housing goals and preferences.

Once a household assessment is completed, the information collected is analyzed in the context of the CE prioritization policies. People with the highest priority are offered services first. This information is collected to determine a strategy to solve the housing crisis, and informs the uniform prioritization process.

In all instances, the assessment process should only gather the information necessary to determine need and best match for housing services and done in a phased approach. Asking unnecessary questions while someone is in crisis may not always get the right results or may traumatize/re-traumatize them. See 7.2 Phased Assessments.

7.1 Assessment Standards

The assessment process gathers all of the information necessary to make prioritization decisions, and the basis is based on the prioritization criteria as defined by the CE prioritization policy.

- For example, if the CE system prioritizes by length of time homeless, and unsheltered homelessness, the assessment process must collect:
 - the information necessary to determine the length of time homeless
 - where the household is staying
- Prioritization as a process separate from determination of eligibility, including:
 - Consideration of all projects available to each household in relation to each participating project's unique eligibility criteria.
 - o Consideration of each subpopulation's unique prioritization criteria.
 - Persons fleeing violence, youth and young adults, and households at risk of homelessness may have their own prioritization tools.
 - These types of considerations ensure access to all services available through CE for all subpopulations.
- The assessment processes, including use of assessment and prioritization tools, must be implemented consistently at each access point in order to achieve fair, equitable and equal

- access to services. Procedures must include documentation of uniform assessment processes and tools across access points and staff. Section 4.1 identifies variations allowed in the assessment process based on subpopulation.
- Households seeking assistance and households' service providers must have an opportunity
 to provide additional information for consideration in prioritization decisions. Assessment
 tools alone may not capture all the information necessary to determine priority status.
 However, only information relevant to the CE system's prioritization policy may only be used
 to make prioritization decisions.
- A CE system will not deny assessment or services to a household if the household refuses to provide certain pieces of information.
 - Additionally, the assessment and prioritization process cannot require disclosure of specific disabilities or diagnoses. Specific diagnosis or disability information obtained is only used for purposes of determining program eligibility to make appropriate referrals, and should not be documented in HMIS.
- If street outreach workers administer assessments, policies and procedures must describe
 how households encountered by street outreach workers were offered the same
 standardized assessment process as households who access the CE system through other
 access points.

PROCEDURE: Household assessment process

POLICY: Assessment standardization **POLICY:** Prohibiting assessment denial

7.1.1 Assessment Tool Development

Commerce does not recommend any established assessment or prioritization tool.

Locally developed tools should be co-created with people with lived experience of homelessness and system involvement.

7.1.2 A note on the VI-SPDAT

The VI-SPDAT is a commonly used assessment tool and created by OrgCode. The racial equity analysis conducted by C4Innovation has shown that the VI-SPDAT is not racially equitable: <u>CES_Racial_Equity-Analysis_Oct112019.pdf</u> (c4innovates.com)

OrgCode will be putting the VI-SPDAT to rest: "In a quest to accelerate activities to improve approaches that further promote racial and gender equity, as well as acknowledge vulnerabilities, OrgCode will no longer be investing time or resources in updating and supporting the VI-SPDAT, although the full SPDAT as a service planning and case management tool will continue." Message from OrgCode.

7.2 Phased Assessments

Household information collected in phases, obtains only what is necessary to connect households to appropriate interventions and make prioritization decisions. The approach CE chooses to use will depend on the system's structure, capacity and inventory of resources.

It is a best practice to use a phased assessment approach. Phased assessment will help you assist people with their immediate needs, while also limiting long periods of contact. It can also help you manage a higher volume of calls and inquires. Phased assessment can be flexible; the components of phased assessment are used over a span of a couple of days, a week, or in the same day, if necessary.

Basic Phased Assessment Components

Crisis Needs Assessment: screening to defining the nature of the current crisis helps to ensure the person's immediate safety. The outcome of a crisis needs assessment could include a referral to an emergency service such as victim service provider, another community resource or continuing to the next phase of the assessment process.

- Do you have a safe place tonight?
- Are you in danger or do you need protection from violence?

Diversion & Problem Solving: identify options and help access natural supports. The outcome of a diversion and problem solving could include a creative short-term plan other than entering the homeless crisis response system. See 5.1.1 Diversion.

- Do you have safe friends and family where you can stay?
- Do you need help with mediation to stay where you are?
- Can flexible funding help you stay where you are?

Housing Needs Assessment: when it becomes clear that diversion and self-resolution will not occur, move to asking questions that gather the basic information needed to make eligibility, prioritization and referral decisions.

For more information on phased assessments, please see:

https://www.hudexchange.info/resource/5340/coordinated-entry-core-elements/

7.2.1 Diversion

In the context of these guidelines, diversion means a problem solving strategy that helps households maintain their current housing situation or make immediate alternative solutions outside of the crisis response system.

Diversion problem solving conversations should take place throughout the whole CE process, but definitely before the full assessment is complete, are the households fully assessed through the CE process. This approach helps ensure households only enroll in services through CE when no other options are available.

Diversion involves conversations that:

- Are client-driven
- Are strength-based
- Consider creative solutions
- Link to natural supports

Diversion services may or may not include financial assistance.

7.3 Phone and Virtual Coordinated Entry Assessments

Commerce encourages making phone or virtual assessments available as part of your CE process. Asking tough questions over the phone can seem impersonal so make sure to build rapport and a connection with the person on the other end of the line. Ask how they are doing before asking assessment questions. Take a conversational approach as opposed to reading a script. Building rapport and connection will support the person's needs by collecting accurate information.

If phone or virtual assessments are a new practice for you, advertise this change on the agency website, a sign on the office door, an updated voicemail message and flyers out in the community: grocery stores, pharmacies, gas stations, etc.

If phone calls are overwhelming your agency, here is an *example* of a simple process to prioritize messages and calls: "Initial screening through the Coordinated Entry System Intake Line is available normal business hours on Monday- Friday from 8 a.m. - 4 p.m., excluding holidays and weekends. Program participants have an opportunity to leave a message. The Coordinated Entry Intake Line staff will first triage calls, and are required to return all calls within three business days. High priority calls (e.g. program participants contacting the intake line who are unsheltered) must be returned within one business day."

7.3.1 HMIS Telephonic Consent

If you use HMIS for your CE process, remember that telephonic consent for HMIS entry is allowable. Telephonic consent from the individual may temporarily substitute written consent if written consent is obtained the first time the individual is physically present at the agency. If someone provides telephonic consent and is never seen in person, it is fine to keep that record as consenting in HMIS. There are no documentation requirements, although telephonic consent is noted in the client file, you can now utilize the public alerts under the client notes section in HMIS.

To obtain informed consent, use the Client Release of Information and Informed Consent form as a conversation guide: https://www.commerce.wa.gov/wp-content/uploads/2018/06/hau-hmis-informed-consent-form-2018.pdf

Telephonic consent is not required of people who will have anonymous records. Clients who are:

- 1) In DV agencies or
- 2) Currently fleeing or in danger from a domestic violence, dating violence, sexual assault or stalking situation or
- 3) Are being served in a program that requires disclosure of HIV/AIDS status (i.e.; HOPWA) or
- 4) Under 13 years old with no parent or guardian available to consent to enter the minor's information in HMIS.

Note: Commerce does not require CE to enter data into HMIS at this time; however, The Community CE Governing Entity may require CE be entered into HMIS.

8 Required Training

In order to ensure uniform services, the following basic trainings are required for all CE staff that have direct contact with clients.

At a minimum, complete the following on-demand online trainings before providing direct client services:

- Intro into Problem Solving (Diversion)
- Working with Survivors of Domestic Violence
- Intro into Housing First
- Progressive Engagement

The following trainings are live virtual trainings offered serval times a year at no cost to BoS CE staff. Complete these trainings in the first year of employment:

- Mental Health Training
- Trauma Training 1 & 2
- Racial Equity in Homeless Services
- LGBTQ+ Informed Training

You can find all training information at the Commerce website:

https://www.commerce.wa.gov/serving-communities/homelessness/trainingc

8.1 Commerce CE Training

The Commerce CE Performance Specialist develops and delivers CE 101 Standard Onboarding training to CE staff/assessors.

CE 101 Standard Onboarding training will be offered quarterly starting January 2022, and will cover the high level components of Coordinated Entry such as definition of CE, and the four core elements: access, assessment, prioritization and referral.

The CE 101 Standard Onboarding training will be developed and updated in collaboration with the BoS CE Subcomittee.

8.2 Community Based CE Training

The Community CE Governing Entity must ensure the development of community based CE training curricula to CE staff/assessors and that all CE staff receive training annually. Training may be in person, a live or recorded online session or reading material.

The training curricula must include the following topics for CE staff:

- Review of local processes, including CE policies and procedures, and any adopted variations for specific subpopulations
- How to administer properly an intake/assessment
- How to use assessment information to determine prioritization
- Criteria for uniform decision-making and referrals

POLICY: Training curricula

9 Referrals and Prioritization Lists

The referral process matches households with available resources that will best help households quickly exit homelessness. CE must implement a uniform and coordinated referral process for all beds, units and services available at participating projects.

CE must maintain up-to-date information on project capacities, vacancies and eligibility criteria. For maintenance of this information, the procedures must describe how and by whom.

9.1 Referral Rejections

CE must identify acceptable reasons for referral rejections by projects.

- Acceptable reasons include ineligibility, no foreseeable openings, health hazards at facilities (e.g. COVID outbreak, other communicable disease outbreak, bed bugs or major catastrophe.)
 - o Unacceptable reasons to reject a referral: "not a good fit," unspecified reasons
 - Referrals are required to other appropriate services in instances where there are rejected households.

If there is a project that is continually rejecting referrals for reasons outside the ones listed above, work with the Community's CE Governing Entity for support and/or Commerce's Coordinated Entry Performance Specialist.

9.2 Prioritization Lists

CE must specify the conditions for households to maintain their place on CE prioritization lists (i.e. By-Name lists)

- Unacceptable conditions include: remaining in daily contact, 24 hours to respond, "bad behavior"
- Households have the right to reject housing and service options without retribution or limiting their access to other forms of assistance.
- Additionally, CE must develop a process for follow up with households on prioritization lists.

CE must avoid using a "bucket" approach to prioritization. In a bucket approach, placing households on one waitlist based on the intervention determined through the assessment process to be the best fit. While the assessment process may help determine the intervention type that may best assist households, prioritization decisions should also consider resource availability. When resource availability is not considered, and to match households to only one intervention type, the result is often high need households waiting longer periods for housing services than necessary.

Instead, "dynamic" prioritization considers a household's prioritization status and current resource availability. This approach requires CE to anticipate upcoming resource availability (e.g. next 60 days.) For example, the assessment process may determine that a household with a high level of need would be a good fit for PSH. However, PSH resources will not be available for 60+ days. In this case, refer the household to an available intervention, such as RRH, rather than waiting a long period for a PSH

opening. This approach maximizes the resources available within the crisis response system and keeps wait time down for the highest need households.

POLICY: Referral Rejections by Projects

POLICY: Conditions to maintain list placement

PROCEDURE: Additional referral if rejected by project

PROCEDURE: Maintaining up-to-date information on project capacities, vacancies, and eligibility criteria

10 Household Protections

10.1 Grievance and Appeal Process

Notify Households of their right to submit grievances and how to submit grievances including nondiscrimination and equal access complaints. The CE grievance and appeal procedures must include processes by which:

- Households may appeal prioritization decisions.
- Households may appeal referral decisions.
- Households may present grievances and appeals to staff not involved in the grievance or decision.
- Grievances and appeals are reviewed by staff not involved in the grievance or decision.
- Households are notified of the outcome of the grievance or appeal.
- Includes a policy that does not specify the grievance to be filed by a certain date.
- All CE grievance and appeal processes must be implemented consistently at all CE access points.
- All grievance and appeal processes must be made publicly available. Publicly availability means persons can easily access this information in a public manner. This can include:
 - o Online
 - Signage in office
 - Hand out at intake or in lobby/reception area

POLICY: Grievance and Appeal

PROCEDURE: grievance and appeal submission **PROCEDURE**: grievance and appeal reviews

PROCEDURE: communicating outcomes of grievance and appeal

10.2 Privacy

CE must develop and implement policies and procedures for obtaining household consent to share and store household information for purposes of assessing and referring households.

If CE maintains prioritization lists (i.e. By-Name lists) outside of HMIS, they must extend the same HMIS data privacy and security protections prescribed by HUD for HMIS practices in the HMIS Data and Technical Standards.

CE must adopt the following privacy protections:

CE must not deny assessment or services to a household if the household refuses to provide certain pieces of information.

- If the information is necessary to establish or document program eligibility per the
 applicable program regulation, and a household refuses to provide the information, a
 problem-solving conversation should still occur.
- CE must not deny services to households if sharing data is refused unless federal statute requires collection, use, storage and reporting of a household's personally identifiable information as a condition of program participation.
- Records containing personally identifying information must be kept secure and confidential.
- CE must do everything in their power to protect the confidentiality and privacy of persons fleeing violence and their children, and must also refrain from engaging in activities that compromise their safety.

PROCEDURE: obtaining household consent

PROCEDURE: secure confidential storage of records

10.3 Non-Discrimination

Recipients of federal and state funds must comply with all applicable civil rights and fair housing laws and requirements. CE must comply with the nondiscrimination and equal opportunity provisions of federal civil rights laws as specified at 24 CFR 5.15(a), including, but not limited to, the following:

- Fair Housing Act prohibits discriminatory housing practices (including but not limited to
 "steering" participants towards any particular housing facility or neighborhood) based on
 actual or perceived race, color, U.S. residency status¹¹, religion, sex, age, familial status,
 disability, sexual orientation, gender identity or marital status.
- Section 504 of the Rehabilitation Act prohibits discrimination because of disability under any program or activity receiving federal financial assistance.
- **Title VI of the Civil Rights Act** prohibits discrimination because of race, color, or national origin under any program or activity receiving federal financial assistance.
- 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
 because of disability.

¹¹ Immigration Status and Housing Discrimination Frequently Asked Questions

- 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 projects
 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.
- CE must not use data collected from the assessment process to discriminate or prioritize
 households for housing and services on a protected basis, such as actual or perceived race,
 color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender
 identity or marital status, including those least likely to access homeless assistance.
- Households must not be denied access to the CE process on the basis that the household is, or has been, a victim of domestic violence, dating violence, sexual assault or stalking.

11. Appendices

11.1 Allowances by Subpopulation

	ACCESS	PRIORITY CRITERIA	ASSESSMENT PROCESS
Subpopulation	Can the subpopulation have a separate access point?	Can the subpopulation have priority criteria that differs from the standard priority criteria?	Can the subpopulation be assessed differently?
Households with Children	Separate access point is allowable	Standard Priority Criteria	Variation in process is allowable
Single Adults	Separate access point is allowable	Standard Priority Criteria	Variation in process is allowable
Households Fleeing Violence: domestic violence, dating violence, sexual assault, stalking, trafficking, or other dangerous or life- threatening conditions	Separate access point is allowable	Different priority criteria is allowable	Different assessment process is allowable
Youth and Young Adults: youth under the age of 18 and young adults ages 18- 24	Separate access point is allowable	Different priority criteria is allowable	Different assessment process is allowable
HEN: Housing and Essential Needs eligible households	Separate access point is allowable	Standard Priority Criteria	Must use assessment process for relevant subpopulation (i.e. single adults, youth and young adults, etc.)
Prevention: Households at-risk of homelessness		Different priority criteria is allowable	Different assessment process is allowable
By and for/Culturally Specific Organizations	Separate access point is allowable	Standard Priority Criteria	Variation in process is allowable
Tribal Community Access point	allowable	Standard Priority Criteria	allowable .
Veterans	Separate access point is allowable	Standard Priority Criteria	Variation in process is allowable

Standard priority criteria means the prioritization criteria established in the CE system prioritization policies.

11.2 Resources

Coordinated Entry Process Self-Assessment. HUD.

https://www.hudexchange.info/resources/documents/coordinated-entry-self-assessment.pdf

Equal Access Rule. HUD, 2011.

https://www.hud.gov/sites/documents/5359-F-02EQACCESSFINALRULE.PDF

Fair Housing Act. Department of Justice, August 2015.

https://www.justice.gov/crt/fair-housing-act-2

Immigration Status and Housing Discrimination Frequently Asked Questions. HUD.

http://www.equalhousing.org/wp-content/uploads/2014/09/2012-Immigration-Status-FAQ.pdf

Section 504 of the Rehabilitation Act. Government Publishing Office, 1973.

https://www.gpo.gov/fdsys/pkg/STATUTE-87/pdf/STATUTE-87-Pg355.pdf

Section 504 Frequently Asked Questions. HUD.

https://www.hud.gov/program offices/fair housing equal opp/disabilities/sect504faq

Title II and III of the Americans with Disabilities Act. Congress. Gov, 1990.

https://www.congress.gov/bill/101st-congress/senate-

bill/933/text?q=%7B%22search%22%3A%5B%22americans+with+disabilities+act%22%5D%7D&r=1

Title VI of the Civil Rights Act. Department of Justice, January 2016.

https://www.justice.gov/crt/fcs/TitleVI-Overview

Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing, Notice CPD-16-11. HUD, July 2016.

https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf

Principles of Authentic Community Engagement (state.mn.us)

https://www.health.state.mn.us/communities/practice/resources/phqitoolbox/docs/AuthenticPrinciplesCommEng.pdf

VA Participation in Coordinated Entry: VA Guidance and Implementation Assessment Checklist - HUD Exchange

https://www.hudexchange.info/resource/5638/va-participation-in-coordinated-entry-va-guidance-and-implementation-assessment-checklist/

CE Process- FAQ- A resource for domestic violence and sexual assault service providers https://www.safehousingpartnerships.org/sites/default/files/2017-07/FAQ-Coordinated%20Entry-DV-SA-6-2017.pdf

11.3 Policy and Procedure Template

Policies describe management decisions. Procedures list the steps a team takes to complete an action. Below are sample policy and procedure templates.

Effective Date: November 16, 2018 Approved By: CE Governing Body

COUNTY COORDINATED ENTRY POLICY

9 Training and Developing Staff

SCOPE

This policy applies to all County CE staff (employees and volunteers).

POLICY

- A. All staff must remain current with all required trainings.
- B. Track staff training electronically in the Training Management Database.
- C. CE Organization pays for all required trainings.
- D. CE Organization may pay for professional development training up to a maximum of \$1000 per staff person, per calendar year.

Effective Date: November 16, 2018

Approved By: CE Governing Body

COUNTY COORDINATED ENTRY PROCEDURE

10 Attending a Training

See Also: Policy: Training and Developing Employees

Applies to: CE STAFF

Action By:	Action:
CE Staff	 Notifies supervisor of training request with all training information available, including agenda.
CE Supervisor	 Coordinates with requesting staff to complete Training Request Form. Routes for signature to appropriate person: 3a. \$0 to \$500 Approval required by supervisor. \$500 to \$5000 Approval required by supervisor and Director.
CE Supervisor/ Director	 Reviews Training Request Form for accuracy and completion. Signs and routes to appropriate person: 5a. \$0 to \$500 - Supervisor signs and routes to Administrative Assistant. \$500 to \$5000 - Director signs and routes to Administrative Assistant.
CE Administrative Assistant	 Verifies signature(s) and amount for training. Scans and saves final signed copies in personnel folder. Sends requesting staff a copy of approved request. Submits purchase request for training fees. Routes approved Training Request Form with purchase. Notifies attending staff to submit training request copy and certification of completion to HR Training Manager, when completed, if applicable.