



# COORDINATED ENTRY SYSTEM (CES) POLICIES

**Presented by:**

Office of Homeless Services (OHS)



Homeless Services



# CES POLICIES

## Overview

- Approved on 10/10/24 by the CES Oversight Standing Committee
- Approved on 11/7/24 by the Interagency Council on Homelessness (ICH)
- Can share via email with participants, if needed/requested
- Uploaded to the [San Bernardino County Homeless Partnership \(SBCHP\) site](#)
- Topics include:
  - CES Purpose and Background
  - SBC&C CoC CES Foundation and Vision
  - CES Requirements
  - CES Processes
  - CES Workflow
  - Housing Identification and Placement Team
  - Appendix A: Recordkeeping Recommendations
  - Appendix B: Community Complaint/Grievance Resolution Process
  - Appendix C: Community Complaint/Grievance Investigation Checklist



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# CES POLICIES

## Purpose and Background

- **San Bernardino City and County (SBC&C) Continuum of Care (CoC) purpose** (*CES Policies pg.13*)
  - Coordinate and strengthen access to housing for families and individuals who are homeless or at risk of homelessness throughout San Bernardino County
- **Objectives** (*CES Policies pg.13*)
  - Standardized assessment
  - Streamlined access
  - Prioritization
  - Efficient resource allocation
  - Collaboration
  - Data-driven decision making
- **Guidance** (*CES Policies pg.14*)
  - [24 Code of Federal Regulations \(CFR\) 578](#) (*Homeless Emergency Assistance and Rapid Transition to Housing [HEARTH] Act*)
  - [Coordinated Entry Management and Data Guide](#)
  - [Coordinated Entry Core Elements](#)
  - [Community Planning and Development \(CPD\) Notice 17-01](#)



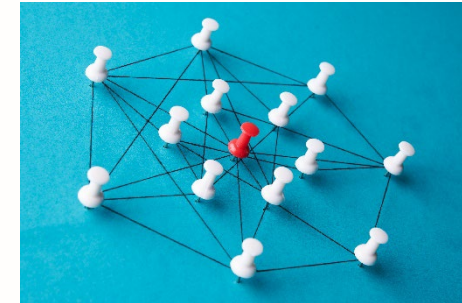
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# CES POLICIES

## Vision and Foundation

The SBC&C CoC CES:

- **Founded on HUD regulations** (*CES Policies pg.15-16*)
  - Guidance used is indicated on previous slide
- **Integrates CoC core concepts** (*CES Policies pg.17-18*)
  - Housing First approach
    - ✓ Connect individuals/families experiencing homelessness to permanent housing without preconditions and barriers to entry
    - ✓ Provide supportive services to maximize housing stability and prevent homelessness
  - Low barrier design
    - ✓ Remove barriers that terminate or prevent from obtaining/maintaining housing (i.e., loss of income)
  - Client-centered service model
    - ✓ Use a vulnerability assessment tool (Vulnerability Index – Service Prioritization Decision Assistance Tool [VI-SPDAT])
    - ✓ Conduct case conferencing (Countywide Case Coordination initiative)
- **Does not require program participants to participate in services/treatment** (*CES Policies pg.18*)



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# CES POLICIES

## Requirements

- **Geographic Coverage** (*CES Policies pg.19-20*)
  - Include entire geographic area covered by the SBC&C CoC
  - Establish access points “hubs” that incorporate diverse entities
- **Standardized access points and assessment** (*CES Policies pg.20-21*)
  - Easy and equal assessment at all access points
  - Reasonable accommodations for a person with disabilities without prioritization
  - Use the Homeless Management Information System (HMIS) to capture client data
- **Standardized prioritization in the referral process** (*CES Policies pg.22-24*)
  - Prohibit discrimination and prioritization for assessments based on race, gender, age, etc.
  - Determine prioritization of program participants partially on their VI-SPDAT score
  - Using a By-Name List (BNL) to case conference (Countywide Case Coordination initiative)
    - ✓ BNL is a working list for permanent housing services that consists of clients who are prioritized based on target population
    - ✓ If two or more households have priority for referral to the next available unit/bed, the household that was first presented for assistance will be referred
    - ✓ If the households have the same VI-SPDAT score, the Countywide Case Coordination Team will discuss and collaborate to determine which household to prioritize



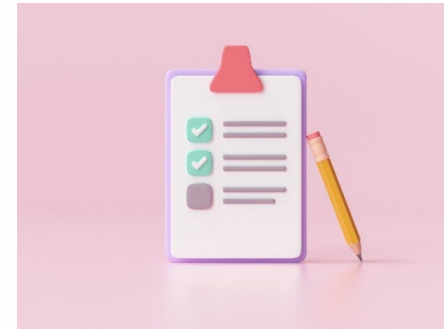


# CES POLICIES

## Requirements

- **Perceived barriers** (*CES Policies pg.25*)
  - Don't screen people out due to barriers (i.e., little/no income, history of substance use, etc.)
  - Allow flexible housing placements and decisions
- **Marketing** (*CES Policies pg.25-27*)
  - CES is available to all eligible persons regardless of race, color, sex, etc.
  - Require CES services to provide an initial immediate response and follow-up within three days
- **Street Outreach** (*CES Policies pg.27*)
  - Consider all outreach teams and workers as access points
  - Make culturally sensitive attempts to engage people until their housing crisis is resolved
  - Document “due diligence” prior to declaring the participant is “unable to locate” and moving to the next participant on the BNL

**Note:** Mirror HUD's three-step process prior to accepting self-certification of homelessness status



# CES POLICIES

## Requirements

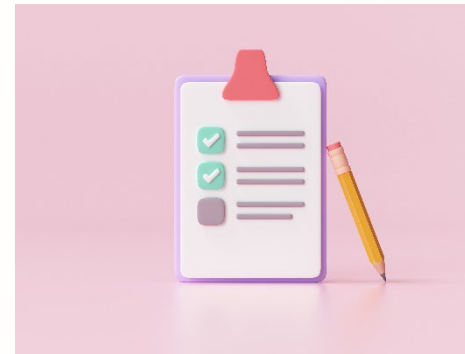
- **Emergency Services** (*CES Policies pg.28*)
  - 24-hour call center from the CES Lead Agency, Inland SoCal United Way (ISCUW) 211+
  - Complete [Housing Eligibility Criteria](#) distributed quarterly by OHS HMIS Team to capture service availability
  - A monthly integrity check to ensure provision and accessibility of services  
**Note:** Conducted by Outreach and CES Committee comprised of a representative from each region in the CoC
- **Homeless Prevention Services** (*CES Policies pg.29*)
  - Separate access points to receive urgent services when and where they are needed
- **Referrals** (*CES Policies pg.29*)
  - Connect households to other referral options (if available) when a referral is declined by Housing Provider or client
  - Provide the CES Lead Agency, ISCUW 211+ with bed availability
  - Master list in HMIS for referrals (Housing Queue)



# CES POLICIES

## Requirements

- **Safety Planning** (*CES Policies pg.30*)
  - Have safe and confidential access to CES and victim services
- **Participant Autonomy** (*CES Policies pg.30*)
  - Participant's right to refuse to answer or share data without retribution
  - Refusal of service options will not affect the participant's place on the BNL
- **Privacy Protections & Policies** (*CES Policies pg.31-32*)
  - Protocol for participants to submit a complaint
    - ✓ [HMIS Grievance Procedures](#)
  - Not publicly displaying address of any domestic violence project
  - Written agreement adhering to HUD's HMIS privacy and security policies
    - ✓ [HMIS Polices and Procures System Manual](#) (OHS)
    - ✓ [2024 HMIS Data and Technical Standards](#) (HUD)
  - Privacy, security, and confidentiality training provided virtually twice a month by OHS HMIS Team
    - ✓ Included in HMIS New User Training





# CES POLICIES

## Requirements

- **Equal Access to Services** (*CES Policies pg.32-34*)

- Restricted eligibility for immigrants

**Note:** If at least one member of the household is eligible, the entire household may live in the unit, though the rent would be prorated

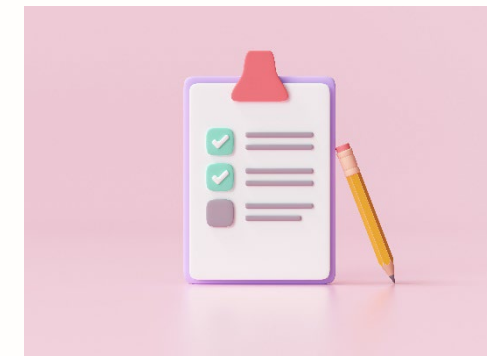
- Post the [California Law Prohibits Discrimination and Harassment in Shelters](#)
- Advise participants/clients of rights regarding confidential information and privacy
  - ✓ [SBCHP CoC HMIS Client Consent & Information Release](#) (Release of Information)

- **Data Security Protections & Policies** (*CES Policies pg.35*)

- Allow victim service providers (VSPs) prohibited by law from entering Personally Identifiable Information (PII) into HMIS to participate in the CES
- Prioritize/expedite safe housing placement that allows for immediate response (within 72 hours)

- **Disciplinary Actions for Privacy and Data Violations** (*CES Policies pg.35*)

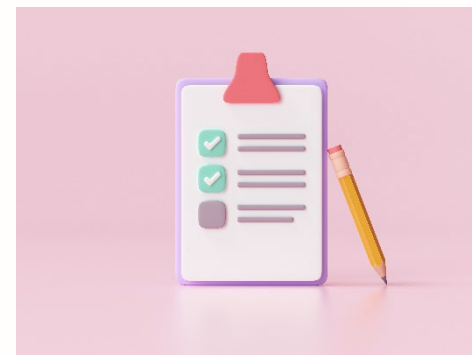
- Based on HUD regulations and guidance - [Breach Notification Policy and Response Plan](#)
- Unauthorized or personal use of, or access to, client PII is prohibited



# CES POLICIES

## Requirements

- **Assessor Training** (*CES Policies pg.36-37*)
  - Provides support/assistance in any area or topic where help is needed to assess clients
    - ✓ VI-SPDAT
    - ✓ Documentation
    - ✓ Service delivery
  - Conducted by ISCUW 211+ virtually or in-person as needed/requested
  - Must first complete HMIS New User and Coordinated Entry (CE) Agency trainings provided by OHS HMIS Team
- **Assessor Training Prerequisites** (*CES Policies pg.37*)
  1. Complete HMIS New User Training
    - Contact [help@ohs-hmis.on.spiceworks.com](mailto:help@ohs-hmis.on.spiceworks.com) to register and attend
  2. Obtain access to HMIS
    - OHS HMIS Team will provide access after completion of training and submission of required documents
  3. Complete CE Agency Training
    - Contact [help@ohs-hmis.on.spiceworks.com](mailto:help@ohs-hmis.on.spiceworks.com) to obtain training videos
  4. Obtain access to CE Agency in HMIS
    - OHS HMIS Team will provide access after completion of training videos
  5. Contact ISCUW 211+ to request Assessor Training
    - [211CES@iscuw.org](mailto:211CES@iscuw.org)



# CES POLICIES

## Requirements

- **Additional Training** (*CES Policies pg.37-38*)
  - **Public:** For the public or others new to the CES concept
    - ✓ Introduction and explanation of what CES is and how to access it
    - ✓ Provided virtually or in-person, as needed, by OHS and ISCUW 211+
  - **CE Agency:** For HMIS users who use the CES, such as End-Users and/or Assessors
    - ✓ How to complete the Universal Assessment Form in HMIS
    - ✓ Adding clients to the community, outreach, and housing queue in HMIS
    - ✓ Consists of two videos requested from OHS HMIS Team at [help@ohs-hmis.on.spiceworks.com](mailto:help@ohs-hmis.on.spiceworks.com)
    - ✓ For technical support, contact OHS HMIS Team at [help@ohs-hmis.on.spiceworks.com](mailto:help@ohs-hmis.on.spiceworks.com)
    - ✓ For additional training/program support, contact ISCUW 211+ at [211CES@iscuw.org](mailto:211CES@iscuw.org)
  - **HMIS (Clarity):** For new and current users of HMIS
    - ✓ New User Training is provided twice a month
    - ✓ Refresher Training is provided every other month
    - ✓ To attend and register, email OHS HMIS Team at [help@ohs-hmis.on.spiceworks.com](mailto:help@ohs-hmis.on.spiceworks.com)
- **Ongoing planning and stakeholder consultation** (*CES Policies pg.38-40*)
  - Recipients of CoC, Emergency Solutions Grant (ESG), and HHAP must identify and allocate funds for CES
  - Annual review process completed by Outreach and CES Committee





# CES POLICIES

## Processes

- **Outreach** (*CES Policies pg.41*)
  1. Engage client to offer services at the client's location
  2. Assess client's needs and conduct an initial screening
    - ✓ Universal Assessment Form on HMIS
    - ✓ Internal program screening forms/questions
  3. Enroll client into HMIS and/or connect the client to services
  4. Obtain required supporting documentation from client (i.e., social security number [SSN], identification [ID])
  5. Follow up with client by connecting him/her to additional stable/permanent services
- **Assessment** (*CES Policies pg.42*)
  - Complete:
    - ✓ Universal Assessment Form in HMIS – completed by all CES partner organizations
    - ✓ Verification of homelessness ([Homeless Verification Form](#))
    - ✓ VI-SPDAT – completed by trained/certified staff
  - Assess for:
    - ✓ Appropriateness of diversion or alternate services
    - ✓ Urgent immediate need (i.e., violence intervention or obvious health risk)



# CES POLICIES

## Processes

- **Enrollment in CES** (*CES Policies pg.43*)
  - Households needing more than diversion or emergency shelter
  - Provide case management and supportive services once referred to housing
  - Process:
    1. Gather the Universal Data Elements
    2. Obtain informed client consent regarding privacy
    3. Register the client in HMIS
    4. Upload client supporting documentation into HMIS
    5. Complete the Universal Assessment Form in HMIS
- **Target Population** (*CES Policies pg.44*)
  - Literally Homeless (HUD Homeless Definition Category 1)
  - At imminent risk of homelessness (HUD Homeless Definition Category 2)
  - Homeless under other Federal statutes (HUD Homeless Definition Category 3)
  - Fleeing domestic abuse or violence (HUD Homeless Definition Category 4)



# CES POLICIES

## Processes

- **Community Complaints** (*CES Policies pg.49-51*)
  - Complaints about a community provider/organization or services shall be sent to OHS at [OHSCommunityConcerns@hss.sbcounty.gov](mailto:OHSCommunityConcerns@hss.sbcounty.gov)
  - Collaborative effort between OHS & Outreach and CES Committee
  - Appeals can be done for the investigation process, but not the decision(s) determined
  - Investigation completed within 30 business days; update provided within 90 business days
  - [Notice of Complaint/Grievance](#)
  - [Complaint/Grievance Form](#)
  - [Community Complaint/Grievance Resolution Process](#)
  - [Community Complaint/Grievance Investigation Checklist](#)
- **Initial Client Contact** (*CES Policies pg.53*)
  1. Client in housing crisis contacts partner organizations (phone or in-person)
  2. Partner organizations gather responses for the Universal Assessment Form questions
  3. Partner organizations:
    - a. If Universal Assessment Form determines client qualifies for CES services, then a referral is made to ISCUW 211+ by registering client's information in HMIS
    - b. If Universal Assessment Form determines client does not qualify for CES services or is appropriate for prevention/diversion, proceed with the client based on organization's policies and procedures without referral for CES prioritization



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# CES POLICIES

## Processes

- **Matching Process** (*CES Policies pg.56*)

- Based on VI-SPDAT score
  - Note:** Score is confidential and cannot be shared with clients
- ISCUW 211+ issues recommendations for appropriate matching and referrals
- Housing interventions are limited based on availability
  - Note:** Additional resources may be provided to eligible individuals/families
- 0-3 score individuals/families
  - ✓ Not required to offer housing intervention
  - ✓ Affordable housing and applicable, population-specific housing resource referrals provided
  - ✓ Families of veterans scoring 0-5, may be eligible for Rapid Rehousing (RRH) programs
- 4-7 score individuals, 4-8 score families
  - ✓ RRH referrals provided
  - ✓ Affordable housing and applicable, population-specific housing resource referrals provided
  - ✓ Chronically homeless may be eligible for Permanent Supportive Housing (PSH)
- 8+ score individuals, 9+ score families
  - ✓ PSH referrals provided, as available
  - ✓ RRH referrals provided, if appropriate
  - ✓ Affordable housing and applicable, population-specific housing resource referrals provided



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# CES POLICIES

## Processes

### Prioritization Review Committee (CES Policies pg.58)

- In process to be established
- Review client prioritization
- Compromised of:
  - Coordinated Outreach Resources and Engagement Program (CORE)
  - ISCUW 211+
  - One primary and back-up from each region
  - A non-conflicted provider (provider who is not impacted by the decision or outcome)
- [Prioritization Review Committee Recommendation Form](#)
  - To appeal a client's prioritization and request for it to be reviewed
  - Submit to Prioritization Review Committee

#### Prioritization Review Committee Recommendation Form

Today's Date: \_\_\_\_\_ Case Manager/Navigator: \_\_\_\_\_

Client Name: \_\_\_\_\_ HMIS #: \_\_\_\_\_

VI-SPDAT Score: \_\_\_\_\_ VI-SPDAT Completed On: \_\_\_\_\_

Client Currently Homeless In: \_\_\_\_\_

- I am recommending this individual's housing need be prioritized.  
Demonstration of need is based upon severe impairment related to:
- |   |  |
|---|--|
| <input type="checkbox"/> Medical Deterioration (see below)              | <input type="checkbox"/> Disability Risk             |
| <input type="checkbox"/> Significant Mental Health Symptoms (see below) | <input type="checkbox"/> Veteran Status              |
| <input type="checkbox"/> Youth-at-Risk                                  | <input type="checkbox"/> Chronic Homelessness Status |
| <input type="checkbox"/> Human Trafficking Risk                         | <input type="checkbox"/> Length of Homelessness      |
| <input type="checkbox"/> Abuse/Trauma                                   | <input type="checkbox"/> PSH (Grant Ending)          |
| <input type="checkbox"/> Underage family members                        | <input type="checkbox"/> Other: _____                |
- Medical or Mental Health – Related Need (if applicable):**  
Is the initial professional assessment available (circle one)? **Yes No**  
Has the medical or mental health need been documented (circle one)? **Yes No**  
Secondary verification available beyond case manager/navigator (circle one)? **Yes No**

Explanation/Justification:

CES Lead Entity Action:



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# CES POLICIES

## Workflow

- **Assessment phase** (*CES Policies pg.62*)

1. Complete Universal Assessment Form in HMIS and/or internal screening questions
2. Gather and upload supporting documentation from client (i.e., ID, SSN)
3. Connect client to appropriate outreach partners/providers, if unable to directly service client
4. Obtain signed release of information from client ([San Bernardino County Homeless Partnership \(SBCHP\) CoC HMIS Client Consent & Information Release](#))
5. Complete VI-SPDAT

- **Referral/Matching Process** (*CES Policies pg.62-63, 65*)

- ISCUW 211+
  - ✓ Make referrals to housing providers via email and HMIS
  - ✓ Place client on BNL, if no program is available when matching the client
- Housing Providers
  - ✓ Respond to ISCUW 211+ within 48 hours on a business day and after a non-business day (i.e., weekend, holiday)
  - ✓ Acknowledge referrals in HMIS by changing status of “pending” to “pending in process”
  - ✓ Make initial contact with the client within three business days, if client is eligible
  - ✓ Make three attempts within 14 business days to contact the client
    - Note:** If no contact is made, update the status in HMIS to “denied reason”
  - ✓ Document all attempts in HMIS
  - ✓ Schedule an intake appointment within five business days and enroll in HMIS program, if client accepts referral
  - ✓ Coordinate with ISCUW 211+ for housing identification/placement
- Client must decide within one business day if they want to accept/decline referral



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# CES POLICIES

## Workflow

- **Updating bed availability** (*CES Policies pg.64*)
  - Complete **Housing Census** distributed biweekly by OHS HMIS Team to capture census of available beds
  - When bed openings become available email ISCUW 211+ at [211CES@iscuw.org](mailto:211CES@iscuw.org)
  - ISCUW 211+ and OHS HMIS Team updates bed availability within one business day of receiving updates
- **Denied referrals** (*CES Policies pg.64*)
  - Client denials
    - ✓ ISCUW 211+ redetermines client's placement on BNL depending on denial reasons
    - ✓ Identify next eligible client on BNL if a referral is denied
  - Housing Provider denials
    - ✓ Returned to Community Queue in HMIS for a new referral, if available prior to next case coordination meeting
- **Auto-expired referrals** (*CES Policies pg.64-65*)
  - Referrals that are not moved to “pending in process” in HMIS
  - Returned to Community Queue in HMIS for new referral, if available prior to next case coordination meeting
- **Referral notifications** (*CES Policies pg.65*)
  - Notifications will be sent/received via email and HMIS
  - Process:
    1. Request HMIS access through agency's leadership
    2. Submit ticket to [help@ohs-hmis.on.spiceworks.com](mailto:help@ohs-hmis.on.spiceworks.com) to request HMIS access/licenses for agency



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# CES POLICIES

## Workflow

- **Enrollment/Eligibility determination** (*CES Policies pg.65*)
  - Made within one business day of intake interview for Emergency Shelter (ES), Transitional Housing (TH), and Rapid Rehousing (RRH)
  - Made when all required documents are in place for Permanent Supportive Housing (PSH)
- **Intake decision-making** (*CES Policies pg.65*)
  1. Select or provide the first available move-in date, if applicable
  2. If unable to enroll client in program, include a reason (in writing) for denial  
**Note:** Deny referral in HMIS
  3. Complete the form of Non-Enrollment Notification, if applicable
    - a. Includes redirection to ICSUW 211+
- **Denial reasons** (*CES Policies pg.66*)
  - No vacancy available
  - Individual/family missed two intake appointments with no notice
  - Certain limited criminal behaviors, no safe accommodation
  - Not eligible under HUD's definitions
  - Exceeds Area Median Income (AMI)
  - Needs higher level of care
  - Abusive/aggressive behavior
  - Client determines referral is inconsistent with needs/preferences (i.e., unsafe area/location)
  - Document all reasons of denial in HMIS



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# CES POLICIES

## Workflow

- **Housing Provider responsibilities** (*CES Policies pg.69-70*)
  - Enroll in permanent supportive housing
  - Obtain proper homeless verification documents (i.e., disability, third-party)
  - Deliver housing stabilization case management (direct or linkage to services)
  - Offer tenant-based rental assistance (i.e., move-in costs, utilities, deposits, rental subsidies)
  - Maintain updates on move-in by documenting in HMIS and contacting ISCUW 211+
  - Provide bed availability to ISCUW 211+
- **Termination of CES participation** (*CES Policies pg.70*)
  - Provide written notice to Outreach and CES Committee
  - Need HUD's/State's written approval to terminate participation
  - Note:** Only if program is required to participate due to HUD regulations
  - Lack of participation may impact eligibility for funding through the CoC





# CES POLICIES

## Housing Identification and Placement Team

- **Comprised of one representative from each region** (*CES Policies pg.71*)
- **Must first enroll/assign client to case management in CES** (*CES Policies pg.71*)
- **Responsibilities** (*CES Policies pg.71*)
  - Landlord recruitment and retention services
  - Housing search and placement services
  - Coordination with participating service agencies
- **Housing Provider submits/uploads required documentation and email referral to HIP Team after ISCUW 211+ enrolls in Housing Provider's program** (*CES Policies pg.72*)
- **HIP Team** (*CES Policies pg.72-74*)
  - Contact Housing Provider within one business day of receiving referral to discuss participant's services
  - Perform customized housing search for unit(s) in target communities
  - Contact target landlords
  - Create arrangements for participant to view the unit
  - Collaborate on the inspection and rent reasonableness
  - Assist with move-in and utility arrangements
  - Provide deposit and first month's rent to landlord
  - Complete rental subsidy agreement
  - Assist with completing the rental agreement and obtaining required paperwork for lease process



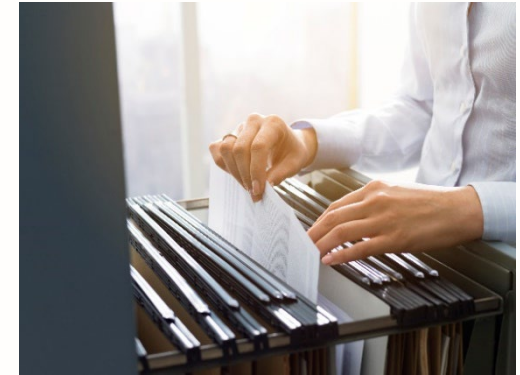
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# CES POLICIES

## Recordkeeping Recommendations

- **Orders of priority** – [CPD Notice 16-11](#), Section II (*CES Policies pg.75*)
- **Documentation requirements of PSH** - [24 CFR 578.103\(a\)\(4\)](#) (*CES Policies pg.75*)
- **Documentation/evidence types**
  - Severe service needs (*CES Policies pg.75*)
    - ✓ Administrative data match
    - ✓ Standardized assessment
    - ✓ Case conferencing notes
  - Recipient is following CoC's written standards for prioritizing assistance (*CES Policies pg.75*)
    - ✓ CoC's revised written standards incorporated into recipient's intake procedures
    - ✓ Recipient follows intake procedures when accepting new program participants
  - No households meet higher order of priority within the CoC's geographic area (*CES Policies pg.76*)
    - ✓ How it was determined there were no chronically homeless households identified for assistance
    - ✓ Outreach efforts to locate chronically homeless households
    - ✓ Number of persons and attempts to engage chronically homeless households
    - ✓ Single prioritized list to confirm no households were identified that met higher order of priority
    - ✓ How it was determined there were no eligible individuals or families that met a higher priority





# QUESTIONS/COMMENTS

## THANK YOU!

- For CES policies questions, contact:  
Melanie Gonzalez Ganceda  
Program Specialist II  
[melanie.gonzalezganceda@hss.sbcounty.gov](mailto:melanie.gonzalezganceda@hss.sbcounty.gov)  
909-501-0604
- For HMIS technical support:
  - Submit a ticket through the Spiceworks Portal at [help@ohs-hmis.on.spiceworks.com](mailto:help@ohs-hmis.on.spiceworks.com)
    - Contact Jonathan Garay  
Automated Systems Analyst II  
[Jonathan.Garay@hss.sbcounty.gov](mailto:Jonathan.Garay@hss.sbcounty.gov)  
(909) 501-0613

