



Pikes Peak Continuum of Care (PPCoC)

Coordinated Entry Policies and Procedures

Version 2.0 – last revised February 15, 2022

TABLE OF CONTENTS

Section I. Introduction to the PPCoC and CES Policy Overview	4
CES Guiding Policy, Purpose, and Structure	5
Geographic Coverage	5
CE Administrator Roles and Responsibilities	6
CoC and ESG Coordination	6
Section II. Guiding Principles and Best Practices	7
Overview	7
CES Guiding Principles	7
Housing First	7
Low Barrier	8
Non-Discrimination	8
Affirmative Fair Housing Marketing	9
Racial Equity	10
COVID-19 Vulnerability	10
Section III. Data Management	11
Overview	11
HMIS	11
Personally Identifiable Information (PII)	11
Security, Privacy, and Data Quality Plan	12
HMIS Training	12
CE Training	13
Section IV. Access	14
Overview	14
“No Wrong Door”	14
Safety Planning and Domestic Violence	14
Geographic Reach	15
Marketing and Outreach	15
Section V. Assessment and Prioritization	16
Overview	16
Assessments	16
By Name List	17
Case Conferencing	18
Types of Housing Programs	19
Dynamic Prioritization	20

Section VI. Referral	21
Overview	21
Guiding Principles.....	21
Person-Centered	22
Document Readiness	22
Follow-Up Requirements	22
Voluntary Participation	23
Referral Length Efficacy	23
Denial of Referrals.....	24
HMIS Entry	24
Grievances.....	24
Section VII. Homeless Prevention and Diversion	25
Overview	25
Implementation	25
Homeless Definitions and Eligibility.....	25
Access.....	25
Assessment	26
Assistance and Prioritization.....	27
Denial of Referrals.....	28
Section VIII. Evaluation	29
Overview	29
Evaluation of CES Policies and Procedures	29
Ongoing Planning	29
Appendices	31
Appendix A. Glossary	31
Appendix B. Homeless Definitions	34
Appendix C. COHMIS Client Forms and CE Intake Materials	37
Appendix D. Additional Resources and References.....	38

I. Introduction to the PPCoC and CES Policy Overview

Under [The McKinney-Vento Homeless Assistance Act As Amended by S. 896 HEARTH Act of 2009](#), the United States Department of Housing and Urban Development (HUD) consolidated three homeless assistance programs into a single grant program known as the Continuum of Care (CoC) program. The purpose and scope of the CoC program is defined under [HUD 24 CFR §578.1](#) as:

1. Promote communitywide commitment to the goal of ending homelessness;
2. Provide funding for efforts by nonprofit providers, States, and local governments to quickly rehouse homeless individuals (including unaccompanied youth) and families, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;
3. Promote access to and effective utilization of mainstream programs by homeless individuals and families; and
4. Optimize self-sufficiency among individuals and families experiencing homelessness.

The CoC serving El Paso County, Colorado is the Pikes Peak Continuum of Care (PPCoC), administered by Community Health Partnership since 2018.

About the PPCoC:

The PPCoC is a network of non-profits, faith-based organizations, social service providers, healthcare organizations, local governments, and community advocates aligned with one common mission: to end homelessness in the Pikes Peak Region. Since 2002, the PPCoC has been a leader in serving and prioritizing funding for people experiencing and at-risk of homelessness in El Paso County, Colorado. In that time, the PPCoC has created three different programs dedicated to planning, tracking, and coordinating homelessness.

PPCoC Statement of Vision:

By 2024, El Paso County and Colorado Springs is a community where homelessness is rare, brief, and nonrecurring.

PPCoC Goals and Strategic Outcomes:

The PPCoC is committed to working on three goals separately through measurable objectives as part of the [2021 3-Year Strategic Plan](#):

1. Make homelessness rare by reducing the inflows of people who experience homelessness into the region.
2. Make homelessness brief by reducing the duration of time people spend in temporary shelter or unsheltered.
3. Make homelessness nonrecurring and onetime by improving system outcomes to permanent housing solutions.

CES Guiding Policy, Purpose, and Structure

Coordinated Entry System Guiding Policy:

The PPCoC uses the Coordinated Entry System (CES) to promote household choice and to demonstrate openness, inclusiveness, and transparency in homeless assistance. The CES operates within the requirements of [HUD Notice CPD-17-01](#), which mandates the Coordinated Entry process be developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their individual strengths and needs.

Coordinated Entry Purpose:

The CES establishes a single process for homeless service and housing providers in the PPCoC's geographic region to refer people experiencing homelessness to CoC Program- and Emergency Solutions Grant (ESG) Program-funded projects. The CES uses a common housing needs assessment tool to prioritize households experiencing literal homelessness and uses that prioritization to match households fairly and equitably with housing assistance and other mainstream resources. The CES creates and supports Access Points within the PPCoC's geographic region where households that are literally or at-risk of homelessness can safely complete the appropriate common housing needs assessment. Lastly, the CES manages referral and prioritization data within the local Homeless Management Information System (HMIS) to evaluate and report CES outcomes that lead to process and system improvement.

The PPCoC CES requires participation and support from agencies with resources committed to helping households attain and retain housing. This will be accomplished through the support of participating agencies and through centralized resources, as and when funding is secured.

Geographic Coverage

The PPCoC supports CoC- and ESG-funded organizations within El Paso County, Colorado. El Paso County is the most populous county in the state of Colorado (based on 2020 U.S. Census numbers) and includes the city of Colorado Springs, which is experiencing both urban and rural growth.

The PPCoC CES markets and identifies Access Points around the county and standardizes these Access Points so that households that are experiencing or at-risk of homelessness can be safely and effectively directed to available CoC- and ESG-funded housing projects and emergency shelters. Additional mainstream resources and public services for vulnerable households are available at Access Points.

CE Administrator Roles and Responsibilities

The lead position in charge of overseeing the CES is the Coordinated Entry Administrator (CE Administrator). The CE Administrator is responsible for the following:

- Facilitating weekly Case Conferencing meetings and distributing meeting agendas to all PPCoC Participating Agencies
- Coordinating community efforts to follow the agreed upon CES Policies and Procedures (PIP), with a focus on continually evaluating and improving the processes of the CES
- Ensuring adherence to the CES PIP in effect and coordinating the updating of the PIP regularly and as needed
- Initiating and tracking program referrals of households that have been identified for a housing program through the CES
- Managing and distributing the weekly By Name List (BNL) in order to prioritize eligible households for available housing programs
- Coordinating and facilitating connections between households that have been matched to a housing program and agency staff to discuss program expectations and eligibility
- Compiling and distributing the weekly Action List and Follow Up documents, which document households that have been matched to a housing program and household updates discussed during Case Conferencing meetings
- Coordinating community outreach efforts to reduce the duplication of records in HMIS and ensuring the comprehensive assessment of all people experiencing homelessness in El Paso County
- Identifying obstacles and barriers to housing and reporting those obstacles to the CE Advisory Committee for review and discussion on strategic goals to remove said obstacles
- Supporting the HMIS Team and training curricula for tools and processes used in the CES
- Engaging new partners in conversations around involvement and opportunities to partner with the PPCoC formally through an Agency Partnership Agreement

CoC and ESG Coordination

The PPCoC and ESG-funders from local and statewide municipalities supports work on standardization between policies and procedures in issuing and overseeing housing projects. Each CoC and ESG-funded organization operating within the PPCoC geographic region collaborates to ensure that the CES follows a standardized screening process, promotes accessible and equitable Access Points, and provides opportunities for prioritized households to be referred to housing project vacancies. The PPCoC coordinates communication around Notices of Funding Availability in order to market available funding opportunities to agencies. The PPCoC has developed [ESG written standards](#) to align around other municipal ESG funders.

II. Guiding Principles and Best Practices

Overview

HUD requires each CoC under [Interim Rule 24 CFR 578.7\(a\)\(8\)](#) to establish and operate a “centralized or coordinated assessment system.” The PPCoC has developed policies and procedures around a CES in order to efficiently and effectively make CoC- and ESG-funded housing projects accessible to the community. The CES does so while prioritizing the most vulnerable households for housing project vacancies through an equitable assessment process.

CES Guiding Principles

The CES uses and promotes the following guiding principles and best practices:

1. Our CoC, encompassing the entirety of El Paso County, supports a person-centered, low barrier approach to housing, ensuring that the needs and well-being of people experiencing homelessness are paramount while fostering self-determination for the household.
2. Our process operationalizes a shared community vision with clear priorities and community ownership.
3. We use real-time key performance indicator data to inform decisions, goal setting, and resource allocation.
4. The process is transparent, with expectations and outcomes communicated regularly to all stakeholders, including housing service providers and households experiencing homelessness.
5. The process is accessible to all and able to prioritize those most in need within different populations for available and appropriate services based on a common housing needs assessment tool.
6. Through coordination, our process ensures that every household assessed for housing needs is linked to the most appropriate resource.
7. Our collaborative effort focuses on long-term outcomes, including sustainability and support for both providers and households in housing retention.

Housing First

Housing First, as defined by the [United States Interagency Council of Homelessness](#), “is a proven approach, applicable across all elements of systems for ending homelessness, in which people experiencing homelessness are connected to permanent housing swiftly and with few to no treatment preconditions, behavioral contingencies, or other barriers.” Housing First is an evidence-based practice designed to maximize housing stability for people experiencing homelessness. Housing First providers operate under the principle that homelessness is a housing crisis and must be addressed through the provision of safe and affordable housing.

Housing First is most successful when supportive services are leveraged to prevent returns to homelessness. Therefore, Housing First utilizes a person-centered housing model to move households experiencing homelessness quickly and efficiently into housing under the assumption that every eligible person is “housing ready.” “Housing ready” means that a person’s eligibility for housing is not based on sobriety, treatment compliance, or criminal histories. Rather, a Housing First approach allows people experiencing homelessness to control their own outcomes and improve their quality of life after they have attained housing.

Key concepts recommended by the CES for a successful Housing First approach include:

- Minimizing programmatic prerequisites to permanent housing entry
- Promoting low barrier-admission to housing programs
- Streamlining the entry process into housing projects in order to maximize time and efficiency
- Persistently offering voluntary supportive services
- Honoring the rights, responsibilities, and legal protections of all people experiencing homelessness

Low Barrier

Access to the CES is low barrier, meaning that people experiencing homelessness seeking PPCoC services are not discriminated against based on perceived barriers to housing. Barriers that are not considered or discriminated against when offering PPCoC services include, but are not limited to:

- Prior or ongoing substance use
- Domestic violence history
- Criminal justice involvement
- Physical, intellectual, and/or developmental disabilities
- Acute, long-term, and/or behavioral health conditions, including Serious Mental Illness(es) (SMI; see *Appendix A*)
- History of evictions, poor credit history, and/or housing lease violations

Non-Discrimination

The PPCoC and CES is designed to create an inclusive system supporting all eligible persons regardless of race, color, national origin, religious beliefs, sex, gender identity, age, familial status, disability, actual or perceived sexual orientation, or marital status. The PPCoC and CES do not use data collection to discriminate or prioritize households based on the aforementioned protected group statuses.

All Participating Agencies within the PPCoC shall comply and adhere to all State of Colorado and Federal statutes relating to non-discrimination. These statutes include, but are not solely limited to ([listing in no particular order](#)):

- *Title VIII of the Civil Rights Act of 1968; amendment for Fair Housing Amendments Act of 1988*
- *Fair Housing Act of 1968*
- *Title VI of the Civil Rights Act of 1964*
- *Colorado Anti-Discrimination Act of 1957*
- *Age Discrimination Act of 1975*
- *Section 503 and 508 of the Rehabilitation Act of 1973*
- *Title II and Title III of the Americans with Disabilities Act of 1990*
- *Drug Abuse Office and Treatment Act of 1972*
- *Title IX of the Education Amendments of 1972*

Affirmative Fair Housing Marketing

The PPCoC and CES affirmatively market housing and supportive services to all eligible persons regardless of race, color, national origin, religious beliefs, sex, gender identity, age, familial status, disability, actual or perceived sexual orientation, or marital status.

[Affirmative Fair Housing Marketing](#) ensures all eligible persons have fair and equal access to housing programs through the PPCoC. These rights and access are ensured through the [Office of Fair Housing and Equal Opportunity \(FHEO\)](#), an agency within the U.S. Department of Housing and Urban Development (HUD). If a person feels that their fair housing rights have been violated, the PPCoC and CES encourage households to file a complaint with the FHEO Office for Region VIII via one of the following avenues:

- Online:
https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint
- Email:
ComplaintsOffice08@hud.gov
- Phone:
(303) 672-5437
(800) 877-7353
TTY (303) 672-5248
- Mail:
Denver Regional Office of FHEO
U.S. Department of Housing and Urban Development
1670 Broadway
Denver, Colorado 80202-4801

Affirmative marketing activities include, but are not limited to, methods of advertising and community outreach, which are designed to reach persons who are least likely to apply for the program. Methods include availability of promotional materials at all Access Points and displaying the [928.1 HUD Form](#).

Affirmative marketing identifies individuals, youths, and families experiencing homelessness that are considered “least likely to apply” and encourages these households to apply for available CoC-

funded housing opportunities. "Least likely to apply" means that there is an identifiable presence of a specific demographic group (i.e., race, color, national origin, religion, sex, disability, or familial status) but members of that group are not likely to apply for housing in the absence of special outreach efforts.

Racial Equity

The CES recognizes the historic and systematic racial disadvantages minority populations have faced in seeking housing in the United States. HMIS is used to track these inequities through dashboards and data analysis and the CES PIP are reviewed annually in order to address these disadvantages. The CES supports and follows the following guidance from [HUD's Racial Equity Homeless System Response](#): "No protected class (race, color, religion, national origin, sex, age, familial status, and disability) can be used as the sole basis for decisions on housing, but communities must take meaningful actions to overcome historic patterns of segregation, promote housing choice, and foster inclusive communities that are free from discrimination." An ongoing goal of the CES is to identify, address, and eliminate inequities and disparities that may present within the system in order to ensure that access to housing is as equitable as possible.

COVID-19 Vulnerability

[Per the CDC](#), certain subpopulations of people experiencing homelessness have been disproportionately impacted by COVID-19 and are at particularly high risk for developing severe COVID-19 symptoms. These [subpopulations](#) include BIPOC (Black, Indigenous, and People of Color) and LGBTQ+ communities, people over the age of 60, and those with underlying health conditions. The PPCoC CES ensures flexibility within the referral process to prioritize these subpopulations for housing vacancies.

The CES has added an additional housing assessment to assess for COVID-19 symptoms that can be reported within HMIS. Preference and priority for housing openings may be given based on this assessment. The CE Administrator offers training on using the assessment and creates opportunities within the referral process to support Participating Agencies advocating for households that are at-risk of homelessness who are particularly vulnerable to developing severe and life-threatening COVID-19 symptoms.

The CES uses ongoing education and resource updates to keep Participating Agencies up to date with all relevant guidance from the CDC and HUD. These updates go out weekly as part of CE follow-up communications, which include any resources or funding opportunities that support at-risk populations.

III. Data Management

Overview

A Homeless Management Information System (HMIS) is a locally-administered database used to collect person and program-level data as it relates to homeless housing and services in a Continuum of Care. As a requirement of participating in the PPCoC, all program and assessment data collected for the PPCoC and CES must be stored in HMIS.

HMIS

The HMIS used by the PPCoC is part of a statewide collaborative with the other three participating Continuums of Care in Colorado: Northern Colorado (NOCO), Colorado Balance of State Continuum of Care (CO BoS CoC), and Metro Denver Homeless Initiative (MDHI CoC). The Colorado statewide HMIS collaborative is referred to as the Colorado Homeless Management Information System (COHMIS). The COHMIS jointly created all policies and procedures that pertain to COHMIS use. The complete [COHMIS Policies and Procedures Manual](#) may be found online.

The vendor used by the COHMIS is Bitfocus, whose product is called Clarity Human Services. CoC and ESG-funded projects are required to be entered and managed within Clarity in order to be compliant with HUD's [HMIS Requirement Rule](#). All Participating Agencies of the PPCoC are required to be offered COHMIS training and are also encouraged to manage non-CoC and ESG-funded projects, to include housing, street outreach, and other supportive service projects supporting direct homeless services.

The COHMIS is required to collect all data as it relates to the CES in managing project enrollment and exit information, assessments, including the housing needs assessment, HUD-required reporting elements, prioritization, and any necessary case management services that support the goal of households' move into permanent housing. Within the COHMIS, there is a specific Coordinated Entry agency that Participating Agencies of the PPCoC have access to after completing the required training(s).

Participating Agencies that enter household information into Clarity must obtain each household members' permission to collect and share their Personally Identifiable Information (PII) within the COHMIS.

Personally Identifiable Information (PII)

PPCoC Participating Agencies are required to abide by the COHMIS Data Standards and Policies set by the COHMIS Statewide Collaborative in the [COHMIS Statewide Policies and Procedures](#) manual. Individuals must consent to participation by signing the [COHMIS Release of Information \(ROI\)](#). Personally Identifiable Information (PII) may be collected in-person or over the phone/email as required by the HUD [HMIS Data and Technical Standards](#).

Each PPCoC Participating Agency is trained on ROI collection and documentation within the COHMIS. Individuals may revoke access and receive a copy of the consent form at any time. ROIs for COHMIS expire after seven years from the last recorded activity and need to be reobtained at that time.

Personally identifiable information (PII) shared within the CES may include:

- Name, age, gender, race and ethnicity, and veteran status
- Contact information (such as phone number or last known address)
- Basic disabling condition information related to physical and behavioral health as well as substance use
- Daily living information, including sleep most frequently and current living situation
- Employment, income, insurance, and other non-cash benefits
- Results from CE-related assessments, including housing needs assessments
- Photography or other likeness (if included); and
- Other required housing-related eligibility factors that may help determine housing project eligibility

All PII or documents containing PII exchanged or shared as part of the CES must be sent through encrypted email or maintained in a secure locked area.

Security, Privacy, and Data Quality Plan

The PPCoC, in collaboration with the other CoCs representing the state of Colorado, developed a [Security, Privacy, and Data Quality Plan](#) for the management of a statewide HMIS. The plan discusses the background context for statewide HMIS implementation, definition of terms, HMIS technical and security standards set by HUD, physical and technical safeguards, data quality standards, and planning. The plan and all COHMIS collaborative documentation may be found online on the COHMIS website [ZenDesk](#).

HMIS Training

The PPCoC facilitates and develops all local training on HMIS software. Training is led by the Data and Training Specialist, whose role is to make HMIS training accessible and relevant to Participating Agencies in order to maximize use of the COHMIS. All training is free of charge and made available to Participating Agencies that use or plan to use HMIS to track household, service, and program data. PPCoC training for HMIS consists of three primary, separate components:

- HMIS 101: a series of videos put together by the COHMIS statewide collaborative to introduce Participating Agencies to the software, explain COHMIS policies and procedures, instruct users on HUD's HMIS Data Standards, and set expectations for data quality and collection procedures. HMIS 101 is self-paced and designed to give context to any new HMIS user on how and why data is collected through COHMIS.

- HMIS 201: an introduction to COHMIS software as it relates to inputting data. HMIS 201 is a hands-on training experience in Clarity and is the next step towards giving the user credentials to COHMIS.
- HMIS 301: reviews the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) and Coordinated Entry prioritization expectations. This class also provides hands on experience for users to input data into Clarity.

The COHMIS Statewide Collaborative conducts an annual refresher training to assist with common issues throughout COHMIS and introduces new data collection requirements put forth by HUD. Compliance with annual refresher training requirements is mandatory for all HMIS users and CES participants. Data and reporting standards are subject to change based on changes HUD makes to the [HMIS Data and Technical Standards](#).

CE Training

The CE Administrator, in conjunction with the Data and Training Specialist, is responsible for the ongoing implementation of all CES-related trainings. Completion of HMIS 101 at a minimum is required for attendees of CES Case Conferencing meetings (see *Section V. Assessment and Prioritization*). HMIS 201 and 301 are strongly recommended but not mandatory for participants that do not require HMIS access as part of their role at their respective agency.

Training requests must be initiated by Participating Agencies' designated Data Partner Agency Liaison (DPAL) by submitting a [ZenDesk ticket](#). If the agency does not have a DPAL, training requests are directed to the CE Administrator. The Data and Training Specialist is responsible for following up on training requests and facilitating HMIS training courses. Upon successful training completion, the Data and Training Specialist notifies the CE Administrator so that the participant can be included in all CE-related communications and invited to Case Conferencing meetings.

CES-specific training and guiding materials are officially approved by the CE Advisory Committee (see *Section VIII. Evaluation*).

IV. Access

Overview

Access is the engagement point or process whereby person(s) experiencing a housing crisis are entered into the CES. People experiencing homelessness may enter the CES through a variety of Access Points, which include CE Participating Agencies or referral partners of the PPCoC and other mainstream resource providers in the PPCoC's geographic region. People experiencing homelessness who present at an Access Point are offered a housing needs assessment so that the household can be ranked and prioritized based on their vulnerabilities for PPCoC housing programs.

"No Wrong Door"

Access Points adhere to a "No Wrong Door" policy, whereby any person(s) experiencing a housing crisis is offered a housing needs assessment and/or referred to or provided with a warm handoff to an additional Participating Agency supporting their subpopulation. This means that, at all physical Access Points (shelters, street outreach providers, health care clinics, etc.), staff and volunteers must make every effort at time of contact to enroll new households in the CES or update households' existing CES enrollment so that households can be considered for housing opportunities.

All physical Access Points operate with minimal barriers to entry and are accessible to people with disabilities. For those people who are least likely to seek out assistance, street outreach is provided. All street outreach staff are trained and required to use the same standardized process as if they were site-based.

People experiencing homelessness who present outside of an Access Point's business hours shall be instructed to return at a different time or redirected to a different Participating Agency. Although Access Points do not operate 24-hours a day or 7-days a week, all Access Points have staff available to assist anyone presenting with an emergency and/or post notices with information about emergency services.

Safety Planning and Domestic Violence

Households experiencing, or who are survivors of, domestic violence, fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, and/or other life-threatening conditions such as human trafficking, are considered homeless under [HUD's Category 4 of Homelessness](#) and are guaranteed safe and confidential access to the CES. If a person experiencing homelessness chooses to seek domestic violence or safety planning services via a Victim Service Provider (VSP), VSPs that participate in the CES must complete the common CE enrollment procedures but do not enter the household into HMIS. VSPs must work directly with the CE Administrator to provide basic household enrollment information so that the household can be manually entered and included on the By Name List (see *Section V. Assessment and Prioritization*).

Any person(s) experiencing domestic violence is encouraged to call the National Domestic Violence Hotline at 1-800-799-7233. In the event of an emergency or life-threatening situation, call 9-1-1.

Geographic Reach

The CES has over 20 Access Points throughout the geographic region served by the PPCoC. The CES actively searches for and recruits new Participating Agencies in El Paso County in order to expand Access Point availability. Expanding geographic reach is invaluable for the CES to serve the most-at-risk populations, including but not limited to veterans, families, rural community members, unaccompanied youth, and survivors of domestic violence.

The CE Administrator maintains and regularly updates a list of Access Points' contact information and availability, which is available on [Community Health Partnership's website](#).

Marketing and Outreach

All Participating Agencies must have prominently posted notices or posters announcing their Access Point information, including address, phone, and hours of availability. The HMIS team inspects sites annually to be sure that these notices are posted and include up-to-date information.

V. Assessment and Prioritization

Overview

The PPCoC CES uses a coordinated process to identify and match households experiencing homelessness in the geographic region with CoC and ESG-funded housing projects using data collected within HMIS. The CES process is intended to help prioritize households experiencing literal homelessness, which are the most vulnerable and in need of housing. Prioritization ensures that households with the highest service needs are matched to the most appropriate housing program.

Assessments

All Coordinated Entry Systems are required by HUD to collect several CE data elements. These data elements allow HUD to monitor and evaluate CES performances through an Annual Performance Report (APR), which is reported directly out of HMIS. The [three data elements](#) are comprised of:

- CE Assessment Element – captures access and referral events to note where and how an assessment is captured. This data element is flexible in collecting date, location, and assessment type.
- CE Event Element – designed to track referrals over time to measure CES and project success in quickly and efficiently moving households from homelessness into housing.
- Current Living Situation – notes where the head of household is staying at a point in time. The Current Living Situation can be updated at each point of contact to track households' location.

The housing needs assessment tool used by the PPCoC is the Vulnerability Index-Service Prioritization Decision Assistance Tool, or VI-SPDAT. The VI-SPDAT is able to incorporate a diversity of household types including Single Adults ([VI-SPDAT Version 2.0](#)), Families ([F-VI-SPDAT Version 2.0](#)), and Transition Age Youth ([TAY-VI-SPDAT Version 1.0](#)). Households enrolled in CE must complete the appropriate VI-SPDAT as well as a Current Living Situation assessment at time of program enrollment to be eligible for consideration for a housing program.

Eligible households are prioritized for housing according to the household's VI-SPDAT score and other criteria. All participating housing projects are required to exclusively accept referrals for project vacancies from the CES' prioritized list of assessed households, or By Name List.

By Name List (BNL)

The CES uses the VI-SPDAT along with CE program enrollment information to rank and prioritize households. The ranking and prioritization of households is visualized through a report known as the By Name List (BNL). The BNL is the tool used by the CES to match households to all housing vacancies during the weekly Case Conferencing meeting.

In order for a household to be considered on the weekly BNL, Participating Agencies must complete a CE program enrollment, a Current Living Situation assessment, and the appropriate VI-SPDAT. The VI-SPDAT must then be referred to the Community Queue, which is a referral holding area within HMIS that captures households seeking to be matched to housing vacancies within the CES.

The BNL is generated and distributed by the CE Administrator. The BNL only considers active households that have completed a VI-SPDAT and Current Living Situation assessment entered or updated in the past 90 days. The CE Administrator exits households from the CE program on a weekly basis that have not updated a VI-SPDAT and completed a Current Living Situation assessment with a CES Participating Agency in the last 90 days. As part of the “No Wrong Door” policy, Participating Agencies should make every effort to update households’ assessment data at point of contact even if the household was initially assessed at a different Participating Agency so that households can remain on the BNL and continue to be considered for housing opportunities.

The following information for each Head of Household (HoH) is captured on the BNL:

- Prioritization Number
- COHMIS ID
- First and Last Name
- Age
- Gender
- Veteran Status
- Disabling Condition
- Household Size
- Monthly Income
- VI-SPDAT Date
- CE Program Enrollment Date
- VI-SPDAT Program Type (Single Adult [Individual], Family, or [Transition Age] Youth)
- VI-SPDAT Score
- VI-SPDAT Score Tier
- Name of Case Manager Who Completed the VI-SPDAT
- Sleeps Most Frequently Location
- Current Living Situation
- Months Since Permanently Housed
- Number of Times Household Has Experienced Homelessness in the Past Three (3) Years

The BNL also includes Case Conferencing notes discussed in previous meetings. Notes captured on the BNL may include referral tracking notes, such as the date of identification; if the household has been connected to any other housing program outside the CES; and any reasons why the household was denied for previous referrals. The Case Conferencing notes also sorts currently identified, standby, and approved households to the bottom of the prioritization list so that they are not considered and matched to any new vacancies, which would be a duplication of services. These households that are currently attached to a housing program through the CES are tracked on the weekly Action List (see *Section VI. Referral*).

The ranking of households on the BNL is determined by a set of prioritization factors. They are, in order:

1. VI-SPDAT Score (Largest > Smallest)
2. VI-SPDAT Score Tier (Permanent Supportive Housing > Transitional Housing > Rapid Re-Housing > Services Only)
3. Months Since Permanently Housed (Longest > Shortest)
4. Number of Times Household Has Experienced Homelessness in the Past Three (3) Years (Largest > Smallest)
5. VI-SPDAT Program Type (Family > Youth > Single Adult [Individual])
6. Veteran status (Veterans > Non-Veterans)
7. Age (Oldest > Youngest)

The BNL is sorted to ensure that the households considered most vulnerable and in need of housing are prioritized and appear at the top of the list while those considered less vulnerable appear at the bottom.

Case Conferencing

One of the core components of the PPCoC CES is a functional Case Conferencing process. Case Conferencing is the process by which CoC and ESG-funded organizations announce their vacancies and funding availability through the CES and households experiencing homelessness are matched with these projects.

Case Conferencing occurs weekly on Wednesday afternoons and are hosted and facilitated by the CE Administrator. Meetings are held either in-person or virtually. A separate Case Conferencing meeting specific to service providers serving veterans and veteran-specific housing projects occurs weekly on Friday mornings and is hosted and facilitated by Rocky Mountain Human Services. Participation in Case Conferencing is limited to staff and volunteers of Participating Agencies of the PPCoC that have completed minimum HMIS training requirements.

Case Conferencing follows a set agenda that is sent out weekly to Participating Agencies. The CE Administrator is responsible for distributing the agenda along with the weekly By Name and Action Lists (see *Section VI. Referral*). The CE Administrator also manages an email listserv of

representatives from Participating Agencies that have signed a [COHMIS Agency Partnership Agreement](#) with the PPCoC and completed all other required documentation and training.

All CES Participating Agencies are required to notify the CE Administrator of any new housing openings during Case Conferencing. During Case Conferencing, the CE Administrator announces all of the available vacancies and uses the prioritization process to match eligible households to those vacancies. If the Participating Agency has vacancies but is not able to attend Case Conferencing, a representative from the agency must email the CE Administrator with the number of vacancies and any funder-defined program eligibility requirements at least one full business day prior to Case Conferencing. The notification must include how many households will need to be *identified* for the vacancies who will be matched and immediately considered for the vacancies, as well as if there are any *standbys* to consider in the event new openings become available and/or the identified households do not engage in program follow up.

Types of Housing Programs

Using the BNL, the CES can most appropriately match households to the housing opportunities whose vacancies are being considered during Case Conferencing. Different housing programs have different program eligibility for consideration, but the overall goal of CES is to prioritize the most vulnerable households.

Households are bucketed into one of four VI-SPDAT Score Tiers and assigned an overall score depending on their VI-SPDAT score and program type. The VI-SPDAT Score Tiers are:

VI-SPDAT Score	Overall Score	Recommended Housing Type
Individuals/Youth: 8+ Families: 9+	4	Permanent Supportive Housing (PSH)
Individuals/Youth: 6-7 Families: 7-8	3	Transitional Housing (TH)
Individuals/Youth: 4-5 Families: 4-6	2	Rapid Re-Housing (RRH)
Individuals/Youth/Families: 0-3	1	Services Only

This overall score allows CES Participating Agencies to advocate for households within the overall score range for any housing vacancies, which is a concept HUD supports through Dynamic Prioritization.

Dynamic Prioritization

Dynamic Prioritization is a concept utilized by the PPCoC CES whereby the CES recognizes the individualization of homelessness and the need for referrals to be flexible and adaptable to fit this individualized need. Dynamic Prioritization is based in the reality that circumstances of each household experiencing homelessness change rapidly and that a VI-SPDAT completed within the past 90 days may not most accurately reflect the current circumstances faced by each household. Additionally, because of the individualization of homelessness, there is no one single pathway out of homelessness and it is therefore important to leverage all available resources to facilitate moving households from homelessness into sustainable housing.

Dynamic Prioritization within the PPCoC CES emphasizes that the VI-SPDAT is essential to create a prioritized range of homelessness needs, but also allows for active Case Conferencing to occur for Participating Agencies to advocate for housing needs beyond what can be captured in a VI-SPDAT. The PPCoC CES can therefore consider a household's overall score to match them with housing opportunities, such as in the following examples:

Example #1: A household that scores a 13 on their VI-SPDAT but is considered chronically homeless may be considered over a similar household that scores a 15 on their VI-SPDAT. Both score within the overall PSH score range of 4, but due to PSH eligibility, the lower VI-SPDAT score could be considered as a more appropriate program match.

Example #2: A household scores a 4 on their VI-SPDAT but has, since the time of assessment, developed a severe acute health condition that requires immediate housing assistance, so this household may be considered over similar households scoring a 5.

VI. Referral

Overview

All PPCoC and ESG-funded projects must accept referrals exclusively through the PPCoC CES. Any other housing projects funded outside of the PPCoC may also voluntarily participate in the CES process by accepting referrals from the CES to match households to available housing vacancies.

Referrals through the CES require two key components: notification of vacancies within housing programs and matching those vacancies with assessed households that have been ranked and prioritized by vulnerability. Housing programs must also share any eligibility requirements within the CES to match eligible households swiftly and most appropriately to program vacancies.

Guiding Principles

The PPCoC CES adheres to certain principles within the housing program matching process to be in line with the PPCoC Vision and Strategic Goals. These principles are:

1. Matching is flexible and dynamic to support the individualization of people experiencing homelessness through a dynamic prioritization process.
2. Matching is conducted in a person-centered approach with Housing First principles to ensure that households move as efficiently and effectively through the process as possible with minimal barriers to housing.
3. Households must have choice in the process and cannot be pressured into accepting a housing match based on program needs.
4. Participating Agencies and the CE Administrator are entrusted with appropriately advocating for and matching housing vacancies with households based on the policies and procedures outlined within the CES PIP.
5. The CES strengthens community connections through the matching process by empowering Participating Agencies to take part in Case Conferencing and present households who are eligible for vacancies.
6. The CES follows guidance from the Office of Fair Housing and Equal Opportunity to support at-risk populations who have historically been disadvantaged to make sure all households have equal access to making their own housing choices.

Person-Centered

The CES promotes household choice and supports matching households to housing opportunities in an approach that is person-centered. The purpose of Case Conferencing is to include Participating Agencies that use their best judgements and intentions to advocate for and match vulnerable households with project vacancies. Households have right of refusal and denial of all referral matches, and a low barrier approach supports persons who are not document ready to be considered for housing vacancies. The CES also tracks referrals over time to support person-centered outcomes.

Document Readiness

By following a Housing First model, the CES allows for the consideration of households for housing programs who may not be considered “document-ready.” Document-ready means having all the necessary documentation to support immediate housing move-in, which may include (but may not be limited to) photo identification, other vital certificates and records, verification of chronic homelessness status, and income verification. Households must gather and submit documentation required of the housing program in order to meet program eligibility but are not required to be document ready at time of identification. Participating Agencies may help support the gathering of documentation and the CES provides community education and resources to help with gathering vital documents.

Follow-Up Requirements

Once a household has been identified and referred to a vacancy within a participating housing program, the identified household must be informed and offered the opportunity. Participating Agencies with housing vacancies are required to outreach the identified households or seek support from organizations providing direct services, such as emergency shelters and street outreach providers, to contact the identified households. The initial point of contact may be facilitated by the specific provider who completed the household’s VI-SPDAT, which will be made available through the BNL.

In order to keep contact information with participating service providers attending the weekly Coordinated Entry meeting current, the CE Administrator maintains a CE Contact List, which lists points of contact at each Participating Agency working within the CES. This CE Contact List is updated quarterly by the CE Administrator. The CE Contact List includes specific providers’ names and job titles, points of contact via email and phone, and the physical address associated with each provider.

The CE Administrator is also responsible for managing two lists to update CES Participating Agencies. The first is the Action List, which captures and tracks referral information week-to-week during Case Conferencing. The Action List includes households’ date of identification, the date households were accepted to the program and/or received the housing voucher, and the tentative or final housing move-in date. The Action List is updated weekly and includes the COHMIS client ID, VI-SPDAT score, and first three and last three initials of the head of household’s

name. The Action List also includes weekly updates to show household progress and assigns next steps for CES Participating Agencies. The Action List is reviewed during Case Conferencing to guide the discussion on households being considered for housing openings. If a Participating Agency engaged with one or more households on the Action List is unable to attend Case Conferencing, an agency representative is expected to provide an update on the household(s) via email to the CE Administrator prior to the meeting.

The second list is the CE Follow Up list, which provides an overview of the households that are currently identified or listed as a standby for housing vacancies. The Follow Up list also indicates those households that have been designated as “Back to List” (BTL), i.e. households that have voluntarily turned down a housing program or been denied by the housing agency. A household that has been indicated as BTL remains eligible for future housing opportunities as long as they are in the PPCoC geographic region and maintain enrollment in the CES.

Voluntary Participation

CES referrals are voluntary and up to the discretion of the referred household to accept. Households that are matched and referred to housing programs have the right to refuse housing referrals and will not be discriminated against for future housing referrals and identification.

Any identified household may notify their intent to turn down the opportunity through written or verbal refusal and is eligible for future identification for other available housing programs within the CES. Refusing a housing referral also does not preclude the household from consideration for the same program if the opportunity presents itself at a future date.

All program refusals must be communicated verbally to the CE Administrator by a Participating Agency during Case Conferencing or by written communication via email. The CE Administrator must also be informed if the refusal creates a new vacancy that needs to be referred and identified. The CE Administrator may assist with making refusal determinations and the situation may be discussed with Participating Agencies to confirm that the refusal is final.

Referral Length Efficacy

Referrals through CES are time-limited and based on household engagement. Identified households have two weeks from the date of the initial referral to be outreached and connected to the housing program. If the identified household does not respond or cannot be contacted within two weeks of outreach, the household can be denied by the provider. If supporting providers are able to demonstrate lack of sufficient outreach in contacting and engaging the household for the program vacancy, the two weeks may be extended on a case-by-case basis decided during Case Conferencing with participating agency input and discussion.

Housing program referrals are frequently time-limited due to funding availability. Therefore, if an identified household has not sufficiently engaged in program requirements or maintained ongoing communication with the housing provider within 30 days of the original date of identification, the referred household may lose the program vacancy opening and a new household may be considered for the vacancy.

Denial of Referrals

Both PPCoC Participating Agencies and matched households may deny or decline referrals. The specific allowable criteria for denying a referral must be established by the PPCoC, shared with each project and household identified for the project, and reviewed annually. All participating projects must provide the reason for denial, which is documented in HMIS by the CE Administrator. Acceptable reasons for a denied referral include:

- Household did not meet required criteria for program eligibility
- Household refused participation/did not agree with program rules
- Household moved out of the PPCoC geographic region
- Household was previously housed through an agency's program and was not eligible for repeat services
- Household was unresponsive to multiple communication attempts
- Household resolved crisis without assistance
- Household did not submit required documentation or submitted false documentation
- Household needs could not be addressed by the program
- Housing program met capacity/unit availability
- All housing options exhausted (household was denied by all landlords/property management companies with vacancies)
- Conflict of interest

Other reasons for denial that may not be included or accurately reflected in the aforementioned list must be brought to Case Conferencing for discussion.

HMIS Entry

Referrals are tracked within the COHMIS *CECS_CoordinatedEntry_CE* program. The CE Administrator submits referrals to housing programs for identified households. Additionally, if any referrals are denied or expired, the CE Administrator tracks those denials and expirations within COHMIS to support a CE APR.

Grievances

Any households with a grievance or complaint may file with the [Office of Fair Housing and Equal Opportunity](#). The COHMIS has a formal grievance process outlined on the [COHMIS Statewide Collaborative website](#).

VII. Homeless Prevention and Diversion

Overview

The PPCoC CES has developed separate but inclusive policies and procedures within the CES to fully support Homeless Prevention and Diversion-funded housing projects. All Homeless Prevention and Diversion projects receiving funds from the PPCoC or ESG funds from the City of Colorado Springs and/or State of Colorado are required to utilize the CES for assessing, assigning, and assisting eligible households.

Implementation

All PPCoC or ESG-funded programs, or other eligible Homelessness Prevention and Diversion programs, must present their funding opportunities through the CES in order to assess households seeking assistance and prioritize funding to those with the highest vulnerability. The PPCoC's intent is to prevent as many vulnerable households from becoming homeless as possible by assigning households to the most appropriate housing program while honoring household choice throughout the process.

Homeless Definitions and Eligibility

Per HUD 24 CFR § 576.2, Homeless Prevention and Diversion funds are intended for [Categories 2, 3, and 4 definitions of homelessness](#). Furthermore, Homeless Prevention and Diversion funds can be used on households that are [at-risk of homelessness](#) (see *Appendix B. Homeless Definitions*).

In addition to household status, Homeless Prevention and Diversion funds may only be awarded to eligible households based on household income and need for assistance. For ESG-funded projects, eligible household income is typically below 30% [Average Median Income \(AMI\)](#) for the area, as calculated by HUD under the Office of Policy Development and Research. However, some funds may have different AMI requirements based on project requirements.

Households must document their need for assistance and intention to either regain stability of their permanent housing or move into other permanent housing. These eligible components must be documented by the funding-recipients' consolidated plan.

Access

Homeless Prevention and Diversion Access Points are available throughout the geographic region served by the PPCoC and are supported by Participating Agencies of the PPCoC. PPCoC Participating Agencies must undergo PPCoC-organized training to administer the VI-SPDAT. For Homeless Prevention funds, a specific Prevention-VI-SPDAT (PR-VI-SPDAT) is utilized for single adults (individuals) and families.

Not all Participating Agencies of the PPCoC are trained on administering the PR-VI-SPDAT. However, agencies awarded Homeless Prevention and/or Diversion dollars are required to be trained on the assessment tool. These agencies are required to use the CES to inform the community how, when, and where the PR-VI-SPDAT can be completed. Homeless Prevention-eligible households must complete either the PR-VI-SPDAT for Single Adults or PR-VI-SPDAT for Families.

The CES is responsible for disseminating Access Point information to Participating Agencies in the PPCoC geographic region to be inclusive of the “No Wrong Door” policy. Access Points are listed on the Homeless Prevention schedule, which is updated quarterly by the CE Administrator and shared on [Community Health Partnership’s CE page](#).

Assessment

Participating Agencies can identify households seeking Homeless Prevention or Diversion funds through referrals, outreach, or walk-in requests for assistance. Once identified, the trained agency staff must complete the following forms with the head of household to collect programmatic information for program enrollment and data entry into HMIS:

- *COHMIS Client Consent for Data Collection and Release of Information*
- *CoC/ESG Intake Form for Project Types: Permanent Housing (PSH, PH, RRH), Homelessness Prevention, Transitional Housing, Services Only*
- *Child Intake Form (if with children)*

All intake and enrollment documents are posted online on the [Colorado HMIS \(COHMIS\) Statewide Collaborative website](#).

Agency staff must then administer the following appropriate PR-VI-SPDAT based on household size (Single Adult vs. Family) with the head of household:

- *Prevention / Re-Housing Vulnerability Index - Service Prioritization Decision Assistance Tool (PR-VI-SPDAT) Prevention/Re-Housing Prescreen Tool for Single Adults*
- *Prevention / Re-Housing Vulnerability Index - Service Prioritization Decision Assistance Tool (PR-VI-SPDAT) Prevention/Re-Housing Prescreen Tool for Families*

All PR-VI-SPDAT materials are posted on [Community Health Partnership’s CE page](#).

Please note that, if a household was assessed with a VI-SPDAT (Single Adult, Youth, and/or Family) under the CE program in HMIS within the last 90 days and the household does not meet the criteria of literal homelessness under Category 1 of HUD’s Homeless Definitions but is eligible for Homeless Prevention funds, a PR-VI-SPDAT is not required to be administered. Instead, an existing VI-SPDAT may be used as an equivalent substitute for prioritization. In these situations, the agency must notify the CE Administrator to ensure that the process is properly documented and that the household is exited from the CES in HMIS so that the household will not appear on the CE BNL and be considered for housing opportunities through the Case Conferencing process.

Household program enrollment information and PR-VI-SPDAT data must be entered into HMIS by agency staff within five business days of documentation completion and enrollment in the Participating Agency’s HMIS Homeless Prevention Program. HMIS data entry should happen in real time in line with the best practices of the PPCoC and CES.

Assistance and Prioritization

Households are assigned a PR-VI-SPDAT score based on their responses to the assessment questions. The scoring rubric is as follows:

PR-VI-SPDAT Score	Service Recommendation
22+	Strong Recommendation for Financial Assistance
16-21	Recommendation for Financial and/or Case Management Support
11-15	As Resources Allow, Consider Financial and/or Case Management Support
0-10	No Assistance; May, However, Provide Referral to Mainstream Resources

The PPCoC and CES recommends prioritizing households for assistance based on the PR-VI-SPDAT. However, the recommendation does not extend to following the scoring rubric guidance exactly as written for awarding funds. Assistance should be prioritized based on vulnerability to ensure that households who need assistance the most can receive it in a timely manner. Households should not, under any circumstances, be screened out of the CES process based on perceived barriers. These barriers may include:

- Income (little to none)
- Substance abuse
- Domestic violence
- Resistance to receiving services
- Lease violations or a history of not being a lease holder
- Criminal history
 - Exceptions include:
 - Convictions for manufacturing and/or distributing methamphetamine
 - Registered sex offenders
 - Eviction from federally funded housing for drug-related criminal activity in the last three (3) years. Persons that have a criminal record must be reviewed on a case-by-case basis.

Any eligible household seeking Homeless Prevention or Diversion funds that present at a Participating Agency at the same time as a similarly eligible household must be assessed and funds are to be awarded based on the higher PR-VI-SPDAT score. Therefore, households assessed for funding by the PR-VI-SPDAT and scoring within the 0-10 score range may be awarded funds as long as funding is available and there is no other similar household scoring higher on the PR-VI-SPDAT at time of assessment.

Scoring results from the PR-VI-SPDAT assessments offers Participating Agencies with Homeless Prevention and/or Diversion funds an opportunity to award funds in real time to households in need. The assessment also allows agencies with these funds to prioritize households as referrals come in seeking support without input from the CES Case Conferencing process. Upon the awarding of funds, Participating Agencies must inform the CE Administrator of the agency's decision for data collection and maintenance.

Housing programs, including Housing Prevention projects, are subject to an annual review and funds are awarded based on written standards detailed in Community Health Partnership's ESG Program. Eligible households for housing programs are determined by following project compliance with [24 CFR 576](#) (ESG interim rule).

Denial of Referrals

See *Section VI. Referral* for an overview of referral denials.

VIII. Evaluation

Overview

Evaluation of the CES is required on a scheduled, regular basis to evaluate the overall CES process and includes participant feedback and system performance as it relates to the existing policies. Evaluation is also essential in following the most recent HUD guidance and standards of care practices. The primary focus for evaluation will focus on the appropriateness of matched households to CoC housing programs as well as the effectiveness of the CES to move households quickly and efficiently from assessment into housing placements.

Evaluation of CES Policies and Procedures

The CES Policies and Procedures (PIP) must be reviewed once every two years to ensure compliance with [HUD Notice CPD-17-01](#), which establishes additional requirements for the CES. Policy review is conducted through both Participating Agencies engaged in the weekly Coordinated Entry Case Conferencing meeting and by the CE Advisory Committee. Evaluation consists of reviewing the most recent PIP, including any CES policy addendums created since the last review. The CES PIP is reviewed and discussed in the context of the PPCoC's Goals and Strategic Outcomes.

The CES PIP is evaluated through the following Coordinated Entry data elements:

1. Decrease the length of referral time to move identified households into housing placements.
2. Increase the number of housing placements within the HUD Fiscal Year.
3. Increase the number of unique households assessed and matched to CoC housing programs.
4. Decrease the number of households matched to CoC housing programs who return to homelessness following a housing intervention.

Ongoing Planning

The CE Administrator is required to seek evaluation and review of any updated CES policies, to include CE Addendums, with the CE Advisory Committee. The CE Advisory Committee must be presented with any and all proposed changes to the PIP and provide feedback within thirty (30) days. The CE Administrator then has thirty (30) days to respond to the feedback and make the appropriate changes or updates to the CES PIP. CES policy changes must be shared by the CE Administrator with all Participating Agencies of the CES and Participating Agencies may submit questions or feedback on the policies in writing to the CE Administrator.

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Appendix A: Glossary

Access Point – A Participating Agency of the PPCoC where a person or persons experiencing homelessness can be assessed and enrolled in the Coordinated Entry System (CES).

Action List – The weekly generated list of previously-matched households for CoC housing programs. Households on the Action List are color-coded by their program status -- Standby, Identified, or Accepted/Approved. Updates to the Action List occur on a weekly basis.

Agency Liaison – The representative(s) present at CE meetings on a weekly basis from Participating Agencies in the PPCoC. The Agency Liaison speaks on behalf of their organization and provides updates from their organizations as needed.

Annual Performance Report (APR) – A report compiling data from HMIS that is submitted electronically to HUD on a yearly basis; requirement of CoCs and recipients with HUD funding received through CoC homeless assistance grants.

Average Median Income (AMI) – Income limits that determine eligibility for assisted housing programs; developed and reassessed by HUD on a yearly basis for each metropolitan area, parts of some metropolitan area, and each non-metropolitan county.

At-Risk of Homelessness – See Appendix B.

Back-To-List (BTL) – A designation for a household that has either voluntarily turned down a housing program or been denied by the housing agency. BTL does not designate housing ineligibility and households can be considered for the same or a different program in the future while they are participants in the CES.

By Name List (BNL) – The complete list of households that have taken a VI-SPDAT within the last 90 days. The By Name List is generated on a weekly basis and households are sorted based on prioritization standards.

Case Conferencing – The portion of CE meetings dedicated to matching households to available housing programs within the PPCoC. Case Conferencing also provides an opportunity for Agency Liaisons to update the CE Administrator and Participating Agencies on households that have been matched to a housing program.

Chronically Homeless – Based on the Federal definition adopted by HUD: “Either (1) an unaccompanied homeless individual with a disabling condition who has been continuously homeless for a year or more; or (2) an unaccompanied individual with a disabling condition who has had at least four episodes of homelessness in the past three years.”

Colorado Department of Local Affairs – Division of Housing (DOH) – The Colorado State Department that oversees housing funds which are supported within the CES.

Community Health Partnership (CHP) – The administering non-profit agency overseeing the PPCoC.

Continuum of Care (CoC) – A program designed to: 1) promote communitywide commitment to the goal of ending homelessness; 2) provide funding for efforts by nonprofit providers, state, and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; 3) promote access to and utilization of mainstream programs by homeless individuals and families; and 4) optimize self-sufficiency among individuals and families experiencing homelessness.

Coordinated Entry System (CES) – Defined by HUD interim rule 24 CFR § 578.7(a)(8) as: “A centralized or coordinated assessment system that will provide a comprehensive assessment of the needs of individuals and families for housing and services.”

Diversion, Homeless – Efforts to prevent households from entering into the emergency services system, such as unsheltered living or emergency shelter, by utilizing case management strategies, such as motivational interviewing or rapid resolution conversations, to divert households out of housing crises.

Domestic Violence (DV) – Violence or other abuse by one person against another in a domestic setting that may result in an individual and/or family leaving the situation due to safety concerns.

Emergency Solutions Grant (ESG) – Grant program offered through HUD. Eligible recipients generally consist of metropolitan cities, urban counties, territories, and states, as defined in 24 CFR 576.2.

Homeless Management Information System (HMIS) – The local information technology system used to collect and maintain household data for CoC housing programs and the CES. The HMIS vendor for the PPCoC is Bitfocus Clarity. HMIS has statewide implementation in Colorado and is referred to as the COHMIS.

Household – All the people who occupy a housing unit or intend to occupy a housing unit. A household includes the related family members and all the unrelated people defined by the Head of Household. A person living alone in a housing unit is also counted as a household.

Housing Program – CoC-funded housing opportunities, such as a housing voucher, financial rental assistance, homeless prevention funds, and/or transitional housing placement.

Identified – A designation for households on the BNL who have been matched to a housing program with voucher openings based on prioritization during Case Conferencing.

Literal Homelessness/Literally Homeless (LH) – Individuals and families who live in a place not meant for human habitation, including the streets, a vehicle, emergency shelter, transitional housing, or a hotel paid for by the government or a charitable organization.

Other Permanent Housing (OPH) – A type of HUD-CoC housing voucher for high vulnerability households that require a permanent housing solution. Program eligibility may not be based on chronicity and/or disabling conditions, as would be required in Permanent Supportive Housing (PSH).

Participating Agency – An agency that has signed the Agency Partnership Agreement. The Participating Agency represents all employed staff and volunteers working at that Agency. CoC- and ESG-funded organizations in the geographic region are required to be Participating Agencies with the PPCoC.

Permanent Supportive Housing (PSH) – A type of HUD-CoC housing voucher for the highest vulnerability households. Program eligibility is based on homeless chronicity and disabling conditions. PSH differs from Permanent Housing (PH) in that no supportive services are attached to the PH housing voucher, while supportive services (such as case management) are available through a PSH voucher.

Pikes Peak Continuum of Care (PPCoC) – The collection of nonprofit organizations, housing agencies, and local government agencies responsible for overseeing and distributing CoC funds in El Paso County, Colorado.

Prevention, Homeless – Efforts to prevent housing crises from occurring by preventing household from experiencing homelessness at all. Funding eligibility for homeless prevention programs fall under [HUD's Definition 2, 3, and 4](#) of homelessness as well as [At-Risk of Homelessness](#).

Rapid Re-Housing (RRH) – A short-term type of HUD-CoC housing designed to help move households toward permanent housing from literal homelessness using time-limited financial assistance and targeted supportive services.

Reasonable Accommodation (RA) – An extension of a PH voucher to include additional housing amenities and/or bedrooms based on the household make up; must be requested by the household.

Serious Mental Illness (SMI) – A diagnosable mental, behavioral, or emotional disorder that causes serious functional impairment that substantially interferes with or limits one or more major life activities; includes disorders such as bipolar disorder, major depressive disorder, schizophrenia, and schizoaffective disorder

Standby – A designation for households on the BNL who may be matched to a housing program with voucher openings. A *Standby* is the first in position to claim the opportunity if a household that was *Identified* denies or is deemed ineligible for the voucher.

Street Outreach – Organization-supported case management conducted in the public community, such as parks or streets, with the goal of finding and assessing people experiencing literal homelessness.

Transitional Housing (TH) – A time-limited housing program lasting anywhere between six months to two years for persons experiencing literal homelessness. Does not necessarily have to be CoC-funded. Can include Recovery Homes.

U.S. Department of Housing and Urban Development (HUD) – The United States Department of Housing and Urban Development. A cabinet department in the executive branch of the U.S. federal government.

Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) – The housing assessment tool, created by OrgCode, used to rank, and prioritize literally homeless households. There are three types of VI-SPDATs – Single Adult(s), which assesses individual adults aged 25 and over; Family (FAM-VI-SPDAT), which assesses households that include at least one minor child under the age of 18; and Transitional Age Youth (TAY-VI-SPDAT), which assesses unaccompanied minors and individuals between the ages of 18 and 24.

Appendix B: Homeless Definitions

Per HUD 24 CFR § 576.2 - Definitions, the definitions for [Homeless](#) are as follows:

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, [state](#), or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an [emergency shelter](#) or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for [homeless](#) assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as [homeless](#) under this definition, but who:

(i) Are defined as [homeless](#) under Section 387 of the [Runaway and Homeless Youth Act \(42 U.S.C. 5732a\)](#), Section 637 of the [Head Start Act \(42 U.S.C. 9832\)](#), Section 41403 of the [Violence Against Women Act of 1994 \(42 U.S.C. 14043e-2\)](#), Section 330(h) of the [Public Health Service Act \(42 U.S.C. 254b\(h\)\)](#), Section 3 of the [Food and Nutrition Act of 2008 \(7 U.S.C. 2012\)](#), Section 17(b) of the [Child Nutrition Act of 1966 \(42 U.S.C. 1786\(b\)\)](#) or Section 725 of the [McKinney-Vento Homeless Assistance Act \(42 U.S.C. 11434a\)](#);

(ii) Have not had a [lease](#), ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for [homeless](#) assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for [homeless](#) assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Per HUD 24 CFR § 576.2 - Definitions, the definitions for [At-Risk of Homelessness](#) are as follows:

At-risk of homelessness means: (1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately [available](#) to prevent them from moving to an [emergency shelter](#) or another place described in paragraph (1) of the “homeless” definition in this section; and

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, [State](#), or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the [recipient's](#) approved [consolidated plan](#);

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under Section 387(3) of the [Runaway and Homeless Youth Act \(42 U.S.C. 5732a\(3\)\)](#), Section 637(11) of the [Head Start Act \(42 U.S.C. 9832\(11\)\)](#), Section 41403(6) of the [Violence Against Women Act of 1994 \(42 U.S.C. 14043e-2\(6\)\)](#), Section 330(h)(5)(A) of the [Public Health Service Act \(42 U.S.C. 254b\(h\)\(5\)\(A\)\)](#), Section 3(m) of the [Food and Nutrition Act of 2008 \(7 U.S.C. 2012\(m\)\)](#), or Section 17(b)(15) of the [Child Nutrition Act of 1966 \(42 U.S.C. 1786\(b\)\(15\)\)](#); or

(3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under Section 725(2) of the [McKinney-Vento Homeless Assistance Act \(42 U.S.C. 11434a\(2\)\)](#), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Appendix C: COHMIS Client Forms and CE Intake Materials

COHMIS Client Consent for Data Collection and Release of Information:

[https://static1.squarespace.com/static/5fea50c73853910bc4679c13/t/610979d7971aae5c5af262a7/1628010967860/Client-Release-of-Information v 1.1.pdf](https://static1.squarespace.com/static/5fea50c73853910bc4679c13/t/610979d7971aae5c5af262a7/1628010967860/Client-Release-of-Information+v1.1.pdf)

COHMIS Client Grievance Form:

[https://static1.squarespace.com/static/5fea50c73853910bc4679c13/t/61097a91edbc5f10373649b3/1628011153723/Grievance Form v 1.1 pdf.pdf](https://static1.squarespace.com/static/5fea50c73853910bc4679c13/t/61097a91edbc5f10373649b3/1628011153723/Grievance+Form+v1.1.pdf.pdf)

COHMIS Privacy Notice:

[https://static1.squarespace.com/static/5fea50c73853910bc4679c13/t/61097adafcc46456e8a721a9/1628011227151/Privacy Notice v1.2.pdf](https://static1.squarespace.com/static/5fea50c73853910bc4679c13/t/61097adafcc46456e8a721a9/1628011227151/Privacy+Notice+v1.2.pdf)

* All COHMIS Forms can also be found online at ZenDesk:

<https://cohmis.zendesk.com/hc/en-us/articles/360020127232-COHMIS-Client-Forms>

Coordinated Entry Intake Form (Head of Household):

https://www.ppchp.org/wp-content/uploads/2020/11/COC_CE-Intake.pdf

Coordinated Entry Intake Form (Child):

https://www.ppchp.org/wp-content/uploads/2020/11/COC_CE-Child-Intake.pdf

VI-SPDAT for Single Adults [Individuals]:

<https://www.ppchp.org/wp-content/uploads/2020/11/Single-Adult-VI-SPDAT.pdf>

VI-SPDAT for Families (F-VI-SPDAT):

<https://www.ppchp.org/wp-content/uploads/2020/11/Family-VI-SPDAT.pdf>

VI-SPDAT for Transition Age Youth (TAY-VI-SPDAT):

<https://www.ppchp.org/wp-content/uploads/2020/11/Youth-VI-SPDAT.pdf>

Appendix D: Additional Resources and References

The McKinney-Vento Homeless Assistance Act, As Amended by S. 896 Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009:

<https://www.hudexchange.info/resource/1715/mckinney-vento-homeless-assistance-act-amended-by-hearth-act-of-2009/>

CoC Program Interim Rule:

<https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>

Notice CPD-17-01: Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System:

<https://www.hudexchange.info/resource/5208/notice-establishing-additional-requirements-for-a-continuum-of-care-centralized-or-coordinated-assessment-system/>

Coordinated Entry Policy Brief:

<https://files.hudexchange.info/resources/documents/Coordinated-Entry-Policy-Brief.pdf>

Coordinated Entry Core Elements:

<https://files.hudexchange.info/resources/documents/Coordinated-Entry-Core-Elements.pdf>

HMIS Requirement Rule:

<https://www.govinfo.gov/content/pkg/FR-2011-12-09/pdf/2011-31634.pdf>

HMIS Data Standards:

<https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>

HUD Fair Housing:

https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_and_related_law

HUD Affirmative Fair Housing Marketing Regulations:

<https://www.govinfo.gov/app/details/CFR-2009-title24-vol2/CFR-2009-title24-vol2-sec200-620>

File a Fair Housing Complaint:

https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint

HUD Exchange Resources:

<https://www.hudexchange.info/resources/>

Colorado Anti-Discrimination Act (§24.34):

<https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=2876> (see Parts 5 and 6 for anti-discrimination practices in housing and public accommodations)

Personal Responsibility and Work Opportunity Reconciliation Act of 1996:

<http://www.gpo.gov/fdsys/pkg/PLAW-104publ193/content-detail.html>

ESG Emergency Shelter and Permanent Housing Standards:

<https://files.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards.pdf>

CHP ESG Written Standards:

<https://www.ppchp.org/homelessness/esg/>

Other Relevant Federal Regulations

24 CFR Part 5 Subpart F: Section 8 and Public Housing: Occupancy Requirements for Section 8-Based Assistance

24 CFR 91: Consolidated Submissions for Community Planning and Development Programs

24 CFR 121: Homeless Management Information System (HMIS)

24 CFR 576: Emergency Solutions Grant Program

24 CFR 5.609: Annual Income

24 CFR 982: Fair Market Rent and Rent Reasonableness

24 CFR Part 35: Lead-Based Paint

EPA resources: <http://www2.epa.gov/lead>

HUD resources:

http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_11875.pdf

CFRs cited are amended from time to time and can be found at:

<http://www.ecfr.gov/cgi-bin/text-idx?c-ecfr&tpl=%2findex.tpl/>.