

Policies, Procedures and Standards Committee

Meeting Date: December 14, 2021

Meeting Time: 3:30 p.m. – 5:00 p.m.

Meeting Link: <https://ocgov.webex.com/ocgov/j.php?MTID=m7250105216e73c4b3af375e1d3bf86a3>

Meeting Number: 2452 589 9627

Passcode: pps112

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Committee Chair: Maricela Rios-Faust

Committee Members: Matt Bates, Judson Brown, Natalie Bui, Patti Long, Christina Weckerly-Ramirez

Agenda

1. **Welcome and Introductions** – Chair Maricela Rios-Faust
2. **Public Comments**

Members of the public may address the Policies, Procedures and Standards (PPS) Committee on items listed within this agenda or matters not appearing on the agenda so long as the subject matter is within the jurisdiction of the PPS Committee. Members of the public may address the PPS Committee with public comments on agenda items after the PPS Committee member discussion. Comments will be limited to three minutes. If there are more than five public speakers, this time will be reduced to two minutes. In order to address the PPS Committee, members of the public are to enter their name and agenda item number in the Webex chat box to be placed in a queue. PPS Committee staff will call your name in the order listed in the chat box.
3. **Continuum of Care (CoC) and Homeless Management Information System (HMIS) Updates** – Zulima Lundy, CoC Manager and Erin DeRycke, 211OC
4. **Coordinated Entry System (CES) Policy and Procedures Recommended Changes** – Zulima Lundy, CoC Manager and Rebecca Ricketts, CES Coordinator
 - a. Overview of recommended changes to the CES Policy and Procedures, including emergency transfer request, assessment and prioritization
 - b. Approve the recommended changes to the CES Policy and Procedures
5. **Anti-Discrimination Policy Update** – Zulima Lundy, CoC Manager
 - a. Approve the adoption of an updated Anti-Discrimination Policy for the Orange County CoC in accordance with the guidance from the U.S. Department of Housing and Urban Development and the State of California
6. **Adjournment to:** Regular meeting on January 11, 2022, 3:30 p.m. – 5:00 p.m.

Date: December 14, 2021

Subject: Coordinated Entry System (CES) Policy and Procedures Recommended Changes

Recommended Action:

- a. Overview of recommended changes to the CES Policy and Procedures, including emergency transfer request, assessment and prioritization
- b. Approve the recommended changes to the CES Policy and Procedures

Background and Analysis

The Coordinated Entry System (CES) Policies and Procedures were last revised and approved by the Orange County Continuum of Care (CoC) Board on September 11, 2019. Since then, the CES has continued to evolve and improve and provided us an opportunity to implement the adopted policies and procedures.

The Office of Care Coordination as the Coordinated Entry System Lead contracted with Homebase, a national technical assistance provider in the field of housing and homelessness, to complete an evaluation of the CES. Homebase recommended key changes to the CES Assessment and Prioritization as well as provided some best practices. Attachment C is the report provided by Homebase.

The Office of Care Coordination in partnership with the three components of CES – Individuals, Families and Veterans – reviewed the evaluation findings and recommendations to develop a proposal to update the CES assessment and prioritization policies. This included:

- Incorporating an Emergency Transfer Request for participants who are victims of domestic violence, dating violence, human trafficking, sexual assault, or stalking to request an emergency transfer to another available, safe housing opportunity through CES.
- Discontinuing the use of the VI-SPDAT assessment and utilizing data collected in the program entry screen, primarily focusing on length of homelessness and disabling condition.
- Updating the prioritization policy to remove the use of the VI-SPDAT score and focusing on length of homelessness, disability and chronic homelessness, as well as discontinuing the shelter preference.

In November 2021, the updated draft CES Policy and Procedures were available for public review and feedback was watered in writing and during multiple listening sessions. Attachment D details the feedback and questions provided to the Office of Care Coordination by category. The Office of Care Coordination has worked to integrate the feedback and update the draft CES Policy and Procedures accordingly. Attachment A and B are drafts of the proposed CES policy and Procedures, including a redline version and a clean version. The Office of Care Coordination is recommending the approval of the updated CES Policy and Procedures to the Policies, Procedures and Standards Committee.

Attachments

Attachment A – CES Policy and Procedures – Redline Version

Attachment B – CES Policy and Procedures – Clean Version

Attachment C – Homebase Report: CES Prioritization and Assessment Best Practices &
Recommendations
Attachment D – 2021 CES Policy Feedback and Questions

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COORDINATED ENTRY SYSTEM POLICIES AND PROCEDURES

Date Approved by Continuum of Care Board: **September 11, 2019**

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GOAL

The goal of the Coordinated Entry System is to effectively connect individuals and families experiencing homelessness or at-risk of homelessness to appropriate services and housing interventions to end homelessness in Orange County through:

- dynamic prioritization
- collaborative coordination
- intentional resource utilization
- equitable resource distribution
- regional service planning area prioritization

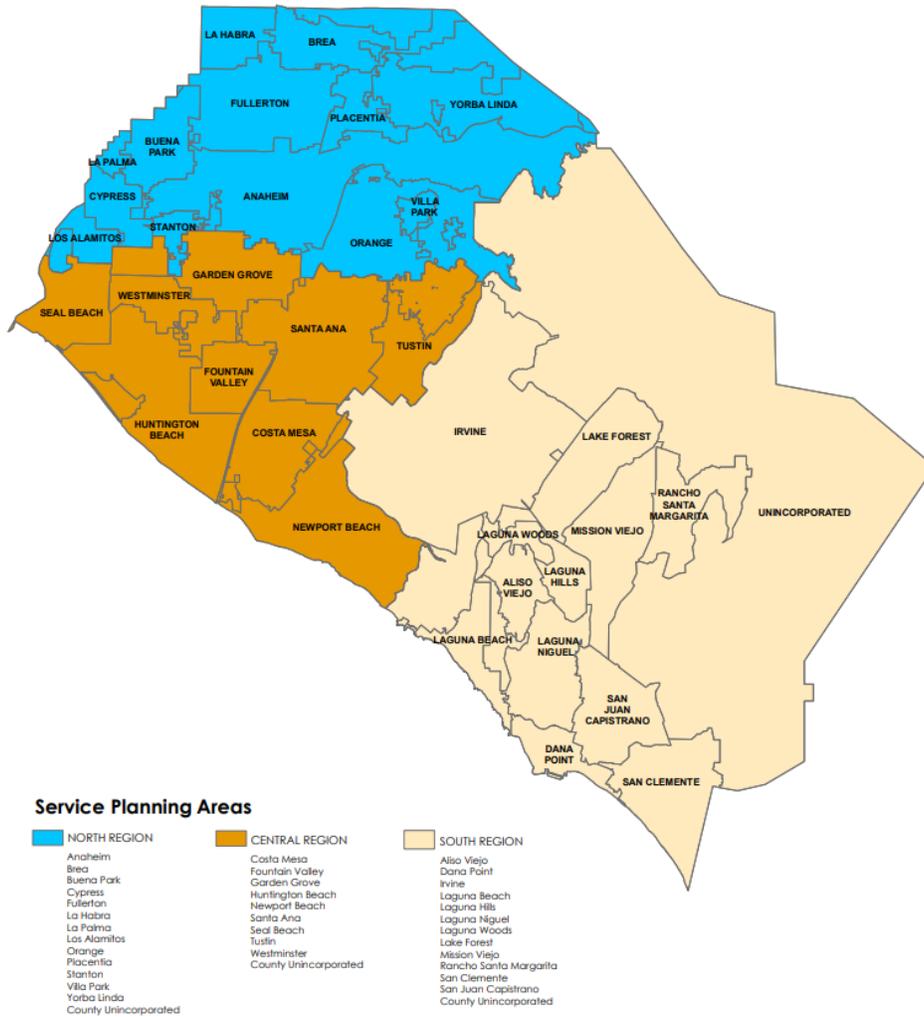
CES LEAD

The CES lead agency, OC Community Resources (OCCR) County of Orange, is empowered by the Continuum of Care (CoC) to manage the process of determining and updating the prioritization for all CoC funded permanent supportive housing (PSH) and CoC and ESG funded rapid rehousing (RRH) as well as any other housing resources that voluntarily participate in the CES. The lead agency will work collaboratively with the CES Steering Committee, a committee of the CoC Board, to develop and review CES policies and procedures every five years, at minimum.

PLANNING

The Orange County CoC CES serves people experiencing homelessness in the CA-602 Orange County CoC, which covers the entire geographic area of the County of Orange Orange County. To ensure full coverage of Orange County's geographic area, the CoC utilizes Service Planning Areas to allow for targeted services and resource allocation.

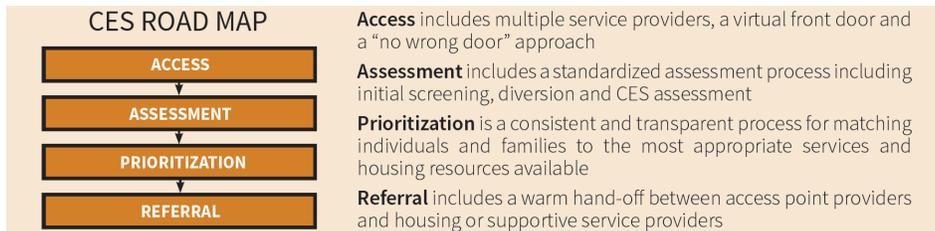
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All households who meet the U.S. Department of Housing and Urban Development (HUD) definition of homelessness are eligible to participate in CES. For definitions, please see attachment A.

CES serves all individuals and families experiencing homelessness in Orange County regardless of race, color, national origin, religion, sexual orientation, gender identity, disability, age, sex, familial status, marital status, income, criminal record, or experience with domestic violence, dating violence, sexual assault or stalking.

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ACCESS

The Orange County CES is operated so that individuals and families seeking housing or supportive services can easily access services. CES and available housing and supportive services are widely advertised throughout the CoC. Marketing strategies include digital and printed media. By displaying posters, flyers, and resource guides, participating agencies within each Service Planning Area will support marketing efforts and mainstream partners such as libraries, schools, police stations, and community centers will be invited to support marketing efforts as well. In some cases, mainstream partners, such as U.S. Department of Veteran Affairs (VA), the Orange County Health Care Agencies (HCA) and Social Services Agency (SSA) Family Resource Centers, may serve as access points.

While marketing will encourage people who are part of a particular cohort to connect with particular access points for a referral to CES, everyone in need will be accommodated and assisted at any access point. All materials will be affirmatively marketed to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, marital status, criminal history, and those who are least likely to complete a CES Housing Assessment in the absence of special outreach. Marketing materials will also be provided in formats accessible to all individuals, including those with disabilities and Limited English Proficiency (LEP).

Prior to attaining access, individuals or families might encounter a referral partner - an entity or agency that can direct a person experiencing a housing crisis to a CES access point. Examples of referral partners include medical providers, law enforcement and public agencies such as Parks and Recreation and the Public Library. Though referral partners cannot directly connect individuals and families to CES, they play a critical, guiding role in connecting individuals and families to emergency services which serve as access points into CES.

Access to CES occurs after a person’s immediate crisis needs have been identified and their basic client information has been entered into the Homeless Management Information System (HMIS). Throughout Orange County, an array of homeless service providers serves as access points. Access points include mobile street outreach teams, navigation centers, emergency shelters and a virtual front door. Access points are distributed geographically throughout the County in all three Service Planning Areas (North, Central, and South) and the virtual front door provides access 24 hours a day through a call center and online access.

To facilitate access to CES for veterans and people with disabilities, the VA and HCA are CES partners with the ability to conduct the standardized CES assessment and participate in the prioritization and referral process.

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Access Model

The Orange County CES is comprised of three systems: CES for Individuals, CES for Families and a Veteran Registry for Veterans. All CES systems work collaboratively and follow all CES policies and procedures.

Orange County CoC embraces a Housing First approach and, as such, CES, offers services and housing to people experiencing homelessness without preconditions (such as sobriety, mental health treatment, or a minimum income threshold) or service participation requirements. In the Housing First model, rapid placement and stabilization in permanent housing are primary goals.

Although there are separate systems for individuals and families, the Orange County CES offers a “no wrong door” approach with a standardized assessment at all access points. Initial standardized screening at each access point allows for immediate linkage to the appropriate subpopulation access point. This provides individuals and families experiencing homelessness a variety of avenues from which to access housing and supportive services, and no one is turned away.

Orange County CES does not prohibit or create barriers to available emergency services. Access to available emergency services are independent of the operating hours or coordinated intake and assessment processes for CES. Completing the standardized housing assessment is not a requirement and no individual or family will be denied access to the crisis response system based on willingness to participate in the assessment process. Regardless of people’s willingness to complete the standardized CES assessment, people will be warmly welcomed into emergency shelters and/or other emergency services, as available.

Accessibility

Orange County CES ensures that access points are accessible to all individuals, including those with disabilities and limited English proficiency. In cases where particular access points are inaccessible for participants for any reason including, but not limited to, structural barriers, language barriers, or transportation limitations, individuals and families will be accommodated at alternative access points or by a street outreach team with the appropriate auxiliary aids and services necessary to ensure effective communication and completion of the standardized assessment.

Safety Planning

Individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking need specialized assistance that promotes and protects their confidentiality and safety. Therefore, while they will have unencumbered access to emergency services and CES, appropriate and prompt referrals to services, including hotlines, and emergency shelters specializing in domestic violence are critical. The following domestic violence resources are available in Orange County:

Human Options	877-854-3594
Interval House	714-891-8121

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Laura's House	866-498-1511
Women Transitional Living Center	714-992-1931 877-531-5522
Sexual Assault Victim Services (North)	714-957-2737
Sexual Assault Victim Services (South)	949-831-9110
2-1-1 Orange County Helpline	211 949-646-4357 888-600-4357

Victim service providers are encouraged, but not required, to use CES and/or HMIS.

Virtual Access

Individuals or families experiencing homelessness or at-risk of experiencing homelessness can call 2-1-1 at any time, day or night, and will be connected with a certified multi-lingual referral specialist who can make referrals to appropriate emergency services based on individual and family service needs and Service Planning Area location.

ASSESSMENT

CES utilizes a standardized assessment process. The standardized assessment is separated into sections which assist in determining homelessness, vulnerability, strengths, barriers and other criteria related to eligibility for housing programs. The standardized CES assessment process is consistent across all access points including street outreach teams.

Prior to completing the standardized CES assessment, access points assess and address immediate needs followed by efforts to prevent homelessness or divert from experiencing ongoing homelessness. If referrals to housing resources available through CES are required, access point staff begin completing the CES assessment with the individual or family experiencing homelessness. The CES assessment may be completed during a single session or over time as immediate needs are addressed and rapport is developed between access point staff and the individuals or families experiencing homelessness.

If an individual is in crisis and requires and chooses shelter, the following steps must be taken:

- First, provide triage including diversion and prevention;
- Then, connect the individual or family with shelter as needed and capacity allows and;
- Finally, follow up to complete the CES assessment.

Safety planning is done for all individuals who may be in danger or could be a danger to themselves or others including identifying appropriate supports and resources. These needs are uncovered through the assessment and responded to immediately to quickly offer appropriate referral linkages. Accessors will be trained on how to understand when a person is at risk of harming themselves or others and serve as mandated reporters so that they are equipped to call 911 when necessary or connect individuals or families to a local hospital for crisis supports.

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CES assessments can and should be updated as contact information or life circumstances change to ensure a successful referral to an available housing resource and corresponding housing provider.

In support of the participant's self-determination and autonomy, CES participants are freely allowed to decide what information they provide during the assessment process, to refuse to answer assessment questions and to refuse housing and service options without retribution or limiting their access to other forms of assistance. Participants who decline to complete the CES assessment or provide incomplete information will be informed by the assessor that incomplete assessment information may limit housing opportunities if the incomplete questions are related to eligibility criteria for specific programs.

Unaccompanied minors (children ages 17 and younger) will be immediately connected to Casa Youth Shelter (800-914-2272) or Huntington Beach Youth Shelter (714-842-6600) for emergency shelter and supportive services. The standardized CES assessment may be completed with an unaccompanied minor, as appropriate.

Providers serving as access points have completed training on conducting the standardized CES assessment and entering data into HMIS. Updated training is provided at least annually. Ongoing support and training are available upon request and as resources permit.

The training covers CES policies and procedures including assessment procedures, prioritization, housing referrals, participant privacy, cultural and linguistic competency, safety planning and trauma-informed practices. Training resources are regularly reviewed and updated as needed but no less than once a year. Training is provided or coordinated by [OCGR—the County of Orange](#).

Each agency participating in CES will assign up to two staff as CES Agency Administrators. Agency Administrators will be required to attend an annual training provided or coordinated by [OCGR—the County of Orange](#) for CES Agency Administrators. Agency Administrators are responsible for communication and training for all CES users and assessors within their organization. Agency Administrators are also responsible for quality assurance of assessments and communication with [OCGR—the County of Orange](#) regarding staffing changes.

PRIORITIZATION

When the need for services is greater than resources available, CES utilizes an established prioritization schema approved by the CoC Board to connect individuals and families experiencing homelessness with available housing opportunities. Housing opportunities available through CES include Permanent Supportive Housing, Housing Choice Vouchers, Rapid Rehousing, and other housing opportunities as they become available. At minimum, all CoC and Emergency Solutions Grants (ESG) funded housing opportunities will prioritize individuals with the most urgent and severe needs on the CES prioritization list who are eligible for the housing opportunity. Other housing resources will be encouraged, but not required, to participate in CES if privately or alternatively funded.

The Orange County CES is integrated into the emergency response services in Orange County to meet basic needs, including emergency shelters and transitional shelters. Individuals and families experiencing homelessness or at-risk of homelessness should work with emergency service providers and/or call 2-1-1 to receive an initial referral to emergency services. Emergency

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response services will utilize the Orange County CES to connect individuals and families experiencing homelessness with available housing opportunities.

Prevention and diversion services are part of CES and may occur prior to engaging in CES or during the process of participating in CES for individuals and families experiencing homelessness or at risk of homelessness. Prevention and diversion are key components of CES that should be utilized in case management and housing plans for all individuals and families experiencing homelessness or at risk of homelessness in Orange County. Individuals and Families at-risk of homelessness and in need of homeless prevention services, should dial 2-1-1 to receive a referral to available homeless prevention services. In instances where there are no appropriate prevention referrals, 2-1-1 will attempt to connect participants to alternate resources.

CES prioritization is a dynamic process. CES will prioritize individuals and families with the longest length of homelessness in the community and highest service needs as determined using CES assessment tools and case conferencing. A regional Service Planning Area distribution prioritization based on the most recent finalized point in time count is used to distribute non-designated County resources by Service Planning Area to avoid forcing individuals or families to move long distances unless by participant choice. ~~The 2019 Point in Time Count found the following distribution of individuals and families experiencing homelessness: 40% in North, 49% in Central and 11% in South Service Planning Areas. Another factor in the prioritization process is connection to emergency shelter, which is aimed at increasing system flow and maximizing limited housing opportunities.~~

The primary factors considered during prioritization is length of homelessness and permanent disabling conditions.

Exceptions to the above prioritization process prioritization based on length of homelessness and disabling conditions may be made through case conferencing and as appropriate to meet specialized client needs. In addition, case conferencing will be employed to ensure housing resources are aligned to client needs and promote effective resource utilization.

~~To facilitate the prioritization process, centralized master prioritization lists have been created for individuals, families, and veterans experiencing homelessness. In addition, a subset of the individual prioritization list is maintained monthly as a Top 10% list. To create the Top 10% list, the top 10% of individuals based on length of homelessness are selected as a sub-set of the master prioritization list. Individual matches are made from the Top 10% list unless no appropriate matches are available at which point, matches are made from the larger master prioritization list. The purpose of the Top 10% list is to focus CES efforts and support a high level of engagement from agencies participating in CES as well ensure the most effective and appropriate use of available resources.~~

All ~~HUD funded CoC PSH~~housing opportunities available through CES ~~must will~~ prioritize chronically homeless individuals and families that are the most appropriate referral to the available resource. Individuals Chronically homeless individuals and families with the longest length of homelessness and with the most significant service needs will be prioritized over chronically homeless individuals and families with shorter lengths of homelessness and less significant needs following the prioritization process described above.

Housing opportunities provided by public housing authorities that are not funded through the CoC (ex. Housing Choice Vouchers) will be prioritized by CES in compliance with the administrative plan for each public housing authority jurisdiction. Prioritization and case conferencing will be

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used to refer individuals and families who are the most appropriate referral to the available resource.

Tenant-based and project-based PSH tenants are permitted to move between PSH opportunities and/or graduate to HCVs, as available and eligible. Movement between PSH opportunities is determined and agreed upon by the housing providers. Vacancies created through tenant movement must be refilled through CES using CES prioritization criteria.

~~All RRH resources available through CES must prioritize individuals and families with the longest length of homelessness and with the most significant service needs over individuals and families with shorter lengths of homelessness and less significant service needs in adherence to the prioritization criteria.~~

Housing opportunities that serve a specific target population may receive referrals of that target population. To target a specific population outside of existing practices and community standards, housing providers must provide documentation to CES of receipt of funding that specifies the funder-defined targeting criteria prior to receiving a referral. Housing providers with targeted housing opportunities will receive referrals from CES that meet the stated targeting criteria, following the system wide prioritization policy for matches.

Participants remain ~~on the prioritization list~~enrolled in CES until the participant is permanently housed, opts out of participating in CES, or becomes inactive. Participants will be made inactive on the prioritization list after 90 days of non-engagement with access points or participating agencies.

Scenario 1: CES receives 5 HCVs for non-elderly, ~~chronically homeless~~ individuals. Based on the 2019 Point in Time results, homeless households were distributed throughout Orange County's Service Planning Areas as follows: 40% North, 49% Central, and 11% South. Therefore, the vouchers will be designated as follows: 2 North Service Planning Area, 2 Central Service Planning Area, and 1 South Service Planning Area. ~~Starting with the Top 10% list, sheltered individuals~~Individuals experiencing chronic homelessness with the longest lengths of homelessness are matched to these opportunities. ~~If there is a tie in the length of homelessness, the HCV will go to the individual with the highest need as measured by the VI-SPDAT or assigned after case conferencing. If no sheltered matches are available, unsheltered individuals on the Top 10% list will be considered prior to considering matches on the master prioritization list. If no individuals experiencing chronic homelessness are available, individuals with a permanent disabling condition experiencing homelessness with the longest lengths of homelessness will be considered followed by people without a permanent disabling condition with the longest lengths of homelessness.~~

Scenario 2: A project-based PSH unit becomes available in the North Service Planning Area for a family. ~~Sheltered families~~Families experiencing chronic homelessness with the longest length of homelessness from the North Service Planning Area are considered first for this opportunity. ~~If there is a tie in the length of homelessness, the family with the highest need based on VI-SPDAT score or other factors discussed during case conferencing will be considered for the housing opportunity. If no sheltered families experiencing chronic homelessness from the North Service Planning Area are available, unsheltered families from the North Service Planning Area will be considered followed by sheltered families experiencing chronic homelessness from any Service Planning Area will be considered followed by families experiencing homelessness with a head of household with a permanent disabling condition from the North Service Planning Area,~~

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and then ~~unsheltered families~~ experiencing homelessness with a head of household with a permanent disabling condition from any Service Planning Area will be considered. Finally, families experiencing homelessness from the North Service Planning Area with the longest lengths of homelessness will be considered followed by families experiencing homelessness from any Service Planning Area.

Scenario 3: An RRH opportunity becomes available for ~~a chronically homeless individual~~s. Sheltered individuals from the Top 10% list with the longest lengths of homelessness are considered first for this opportunity. Then, unsheltered individuals from the Top 10% list with the longest length of homelessness will be considered before considering individuals on the master prioritization list. Individuals experiencing chronic homelessness with the longest lengths of homelessness are considered first for this opportunity. Then, individuals with a permanent disabling condition experiencing homelessness with the longest lengths of homelessness will be considered followed by people without a permanent disabling condition with the longest lengths of homelessness.

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REFERRAL

Housing providers share available housing opportunities through HMIS or a comparable database selected by ~~OCCR~~the County of Orange. Housing opportunities are discussed weekly at the Housing Placement Match Meetings (HPMM) and matched to eligible individuals and families as prioritized by the prioritization schema. The meetings are attended by participating access points, referral partners and housing providers. All information shared at the HPMM is private and confidential. To attend the HPMM, attendees are required to review client privacy and confidentiality requirements and attest to complying with the privacy and confidentiality requirements.

Upon referral to housing opportunities, access points will continue to support participants throughout the housing placement process and, ideally, for a month or more after housing placement to ensure housing stability is achieved.

Upon referral to housing opportunities, housing providers will provide an overview of program expectations including the share of rent and utility costs to participants and maintain regular communication with access point staff and CES. For RRH opportunities, the maximum amount of rent that a participant may pay can be up to 100% of the rental amount. In general, the goal will be that participants pay no more than 50% of their income in rent at RRH program completion.

When an individual or family declines a housing referral, the participant is returned to the prioritization list and remains on the prioritization list for a new housing referral. The individual or family will continue to be prioritized for available housing resources following the prioritization process previously described.

Housing providers may deny a referral from CES under any of the following circumstances:

- Inappropriate referral (ex. Accessibility needs cannot be met)
- Ineligible referral (ex. New intake information fails to meet eligibility requirements)
- Participant obtained other permanent housing
- Participant is unresponsive after multiple contact attempts to all available contact information

Referrals denied by housing providers must be made in writing or electronically in HMIS and include the reason for denying the referral as well as any information obtained during the referral process that ensures accurate participant information and helps improve future referral processes.

When an individual or family is denied by housing providers, the participant is returned to the prioritization list and remains on the prioritization list for a new housing referral. The individual or family will continue to be prioritized for available housing resources following the prioritization process previously described.

Housing provider denials may be contested by conference between the housing provider, the referring agency and ~~OCCR~~the County of Orange. The referred individual or family may also be involved as able and appropriate.

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EMERGENCY TRANSFER REQUEST POLICY

Per the Violence Against Women Act (VAWA), any household who is a victim of domestic violence, dating violence, human trafficking, sexual assault, or stalking can request an emergency transfer under the following circumstances:

- a. A sexual assault occurred on the premises of their HUD-funded housing program; or
- b. Who reasonably believed that they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, stalking, or human trafficking if they remain in that designated HUD-Funded dwelling.

A request for an emergency transfer, under these circumstances, does not guarantee immediate placement, but participants who qualify for an emergency transfer will be given a priority referral over all other applications for the next available, safe unit through CES for which they qualify.

If a household is currently enrolled in a HUD-funded housing program and requests an emergency transfer, the household must follow the housing agency's internal emergency transfer housing process. If the housing program is unable to accommodate the emergency transfer request, the housing program may request an emergency transfer via CES.

PRIVACY AND DATA MANAGEMENT

CES, as an extension of HMIS, is required to comply with all HMIS policies and procedures. All agency staff participating in CES are required to sign and comply with all HMIS policies and procedures.

During CES assessment, assessors are required to obtain participant consent to disclose their information. As needed, consent may be obtained verbally but, ideally, consent will be provided in writing or electronically. When participants consent to disclose their information, they enhance the ability of CES to assess needs and make appropriate housing referrals. If consent is not obtained, services will not be denied.

In the case that full consent is not obtained, please note these special instructions: Do not enter personal identifiable information into HMIS. HMIS will automatically generate an anonymous ID. Please retain at least the first page of the CES assessment part I with the HMIS ID and participant name for your records and future housing referrals.

GRIEVANCE PROCESS

At any time during the coordinated entry process, participants have the right to file a complaint, should they feel that CES has not complied with the nondiscrimination and equal opportunity provisions of Federal civil rights law, fair housing laws and requirements, or the CES policies and procedures. During assessment, all CES participants will be provided with the process for filing a complaint. All complaints will be addressed in a timely and fair manner. The following three contacts are provided to participants for the purpose of addressing discrimination or grievance concerns:

- For grievances with Coordinated Entry System policies and procedures, contact Orange County Community Resources at CoordinatedEntry@ochca.com.
- For service provider related complaints, grievance should be directed to the appropriate service provider for resolution.

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- For housing program related complaints, grievances should be directed to the appropriate housing provider for resolution.
- To file a ~~non~~discrimination complaint, contact the Department of Housing and Urban Development through the online portal: https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint

EVALUATION

CES will be regularly evaluated to analyze effectiveness and to identify areas for improvement. System performance metrics will be examined semi-annually, at minimum, to monitor adherence to system benchmarks. Length of time on priority list, placement rates, and returns to homelessness are sample metrics that will be used to understand system capacity and determine where additional resources are needed.

In addition, feedback will be solicited from CES participants and participating agencies through feedback surveys and focus groups. Participating agencies will be surveyed at least annually and focus group feedback opportunities will also be provided annually to solicit consumer feedback. Annually, all participants who utilize CES will be offered the chance to complete a feedback survey and/or participate in focus group feedback sessions held at geographically dispersed locations. The focus groups and surveys will cover all domains of the coordinated entry process, including intake, assessment and referral, and will be used to gauge participant and agency perception of system quality and effectiveness.

~~OCCR~~The County of Orange, as the lead CES agency, will collect participant and agency evaluations and analyze system performance. The information collected will be used to recommend updates to CES, in consultation with a committee of relevant stakeholders. This committee will meet at least annually to adopt and implement system changes.

For the purpose of the evaluation, data analyzed will be de-identified, and feedback will not require a name or other identifiable information. This will be used to ensure participant and participating agency privacy during the evaluation process.

CES DOCUMENTS AND REGULATIONS

The above policies and procedures replace all previous versions of the Coordinated Entry System (CES) policies and procedures and are intended to ensure that all agencies participating in the Orange County CES comply with the following regulations:

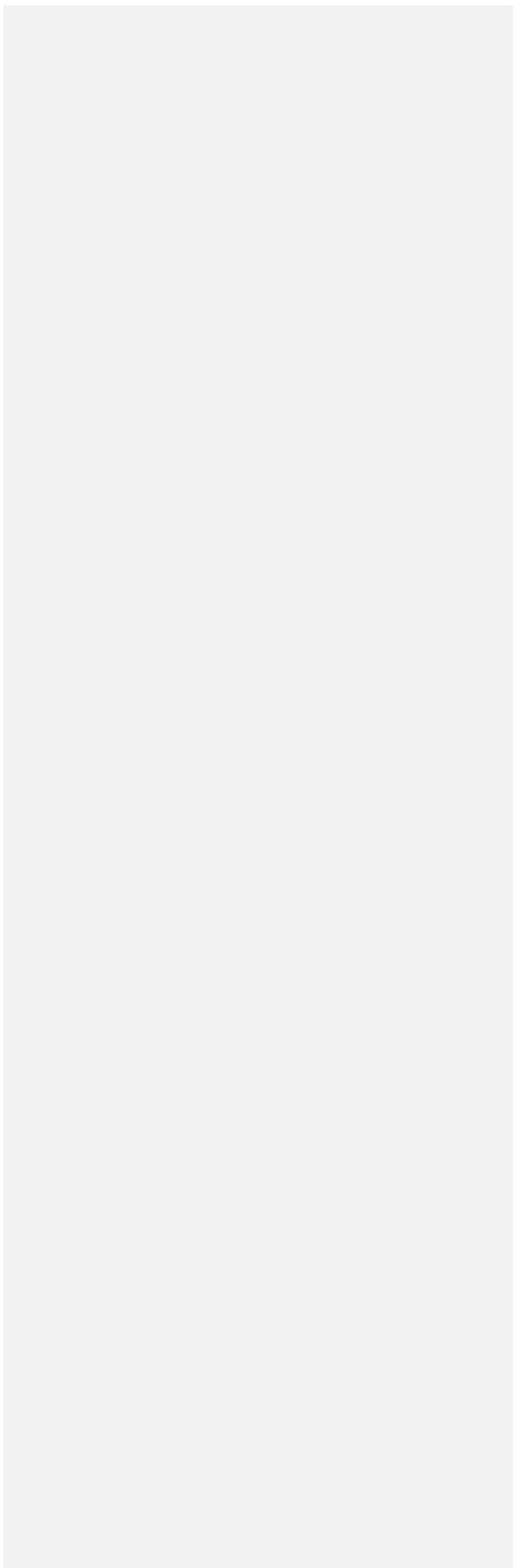
[HUD Coordinated Entry Notice CPD-17-01 - Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System](#)

[HUD Prioritization Notice CPD-16-11 – Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#)

[Continuum of Care \(CoC\) Program Interim Rule 24 CFR 578](#)

[Emergency Solutions Grants Interim Rule 24 CFR 576](#)

[HUD Equal Access rule: 24 CFR 5](#)



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ATTACHMENT A – Homeless Definition

Information on the definition of homeless can be found on HUD Exchange at <https://www.hudexchange.info/resource/1928/hearth-defining-homeless-final-rule/> and is summarized below. The following four homeless categories are eligible to participate in CES.

Category 1. Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a 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 and local government programs); or
- Is exiting an institution where (s)he has 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

Category 2. Imminent Risk of Homelessness

Individual or family who will imminently lose their primary nighttime residence, provided that:

- Residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified; and
- The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 3. Homeless under other Federal statutes

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:

- Are defined as homeless under the other listed federal statutes;
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and
- Can be expected to continue in such status for an extended period of time due to special needs or barriers

Category 4. Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing

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COORDINATED ENTRY SYSTEM POLICIES AND PROCEDURES

Date Approved by Continuum of Care Board: **September 11, 2019**

GOAL

The goal of the Coordinated Entry System is to effectively connect individuals and families experiencing homelessness or at-risk of homelessness to appropriate services and housing interventions to end homelessness in Orange County through:

- dynamic prioritization
- collaborative coordination
- intentional resource utilization
- equitable resource distribution
- regional service planning area prioritization

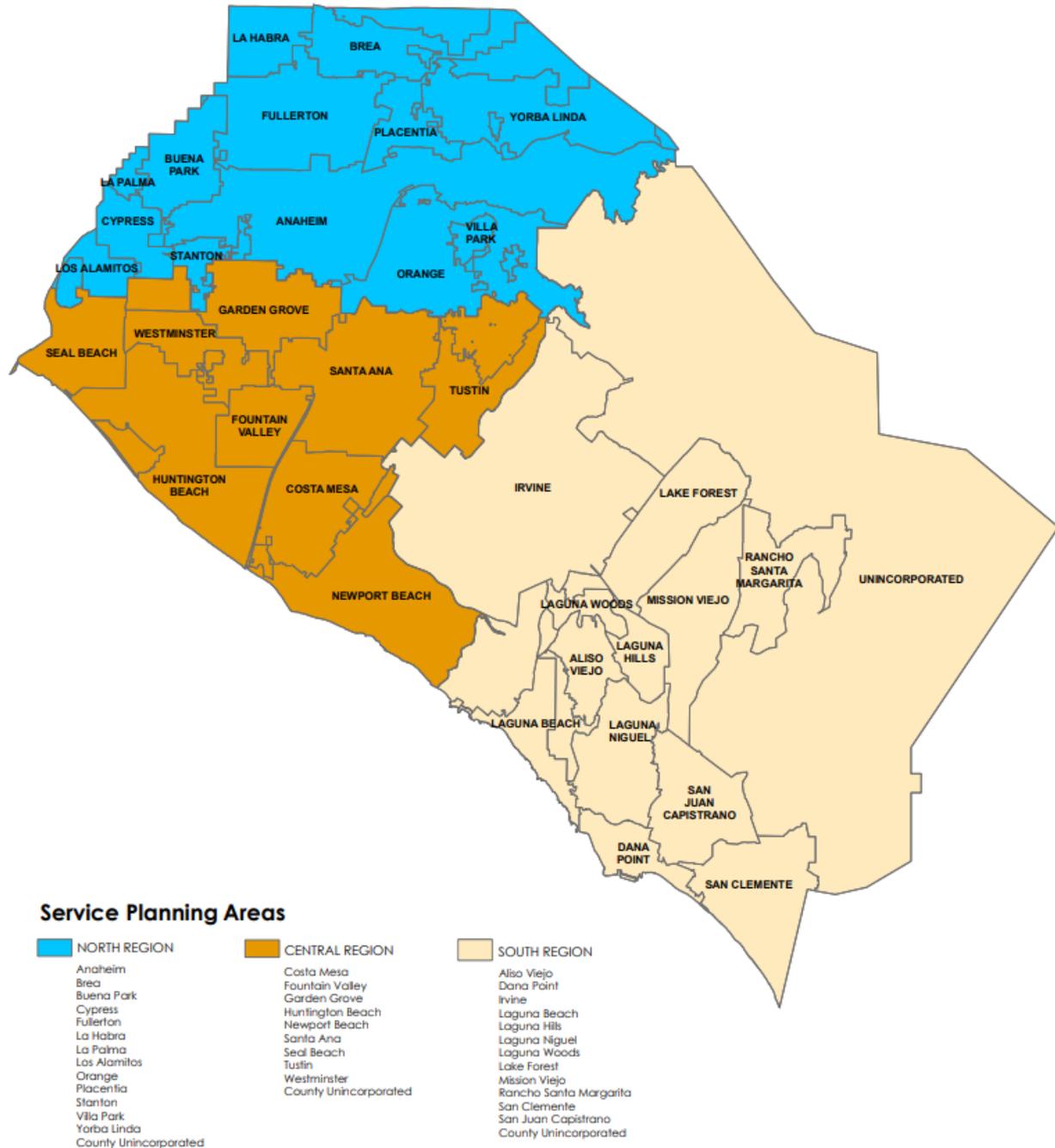
CES LEAD

The CES lead agency, County of Orange, is empowered by the Continuum of Care (CoC) to manage the process of determining and updating the prioritization for all CoC funded permanent supportive housing (PSH) and CoC and ESG funded rapid rehousing (RRH) as well as any other housing resources that voluntarily participate in the CES. The lead agency will work collaboratively with the CES Steering Committee, a committee of the CoC Board, to develop and review CES policies and procedures every five years, at minimum.

PLANNING

The Orange County CoC CES serves people experiencing homelessness in the CA-602 Orange County CoC, which covers the entire geographic area of Orange County. To ensure full coverage of Orange County's geographic area, the CoC utilizes Service Planning Areas to allow for targeted services and resource allocation.

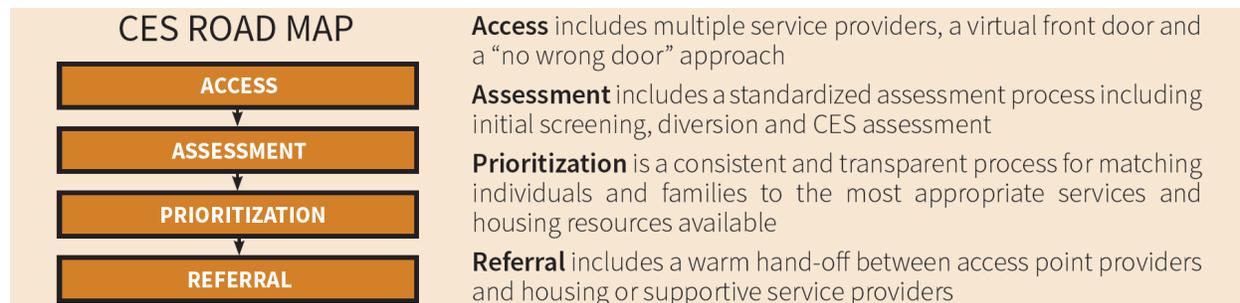
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All households who meet the U.S. Department of Housing and Urban Development (HUD) definition of homelessness are eligible to participate in CES. For definitions, please see attachment A.

CES serves all individuals and families experiencing homelessness in Orange County regardless of race, color, national origin, religion, sexual orientation, gender identity, disability, age, sex, familial status, marital status, income, criminal record, or experience with domestic violence, dating violence, sexual assault or stalking.

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ACCESS

The Orange County CES is operated so that individuals and families seeking housing or supportive services can easily access services. CES and available housing and supportive services are widely advertised throughout the CoC. Marketing strategies include digital and printed media. By displaying posters, flyers, and resource guides, participating agencies within each Service Planning Area will support marketing efforts and mainstream partners such as libraries, schools, police stations, and community centers will be invited to support marketing efforts as well. In some cases, mainstream partners, such as U.S. Department of Veteran Affairs (VA), the Orange County Health Care Agencies (HCA) and Social Services Agency (SSA) Family Resource Centers, may serve as access points.

While marketing will encourage people who are part of a particular cohort to connect with particular access points for a referral to CES, everyone in need will be accommodated and assisted at any access point. All materials will be affirmatively marketed to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, marital status, criminal history, and those who are least likely to complete a CES Housing Assessment in the absence of special outreach. Marketing materials will also be provided in formats accessible to all individuals, including those with disabilities and Limited English Proficiency (LEP).

Prior to attaining access, individuals or families might encounter a referral partner - an entity or agency that can direct a person experiencing a housing crisis to a CES access point. Examples of referral partners include medical providers, law enforcement and public agencies such as Parks and Recreation and the Public Library. Though referral partners cannot directly connect individuals and families to CES, they play a critical, guiding role in connecting individuals and families to emergency services which serve as access points into CES.

Access to CES occurs after a person’s immediate crisis needs have been identified and their basic client information has been entered into the Homeless Management Information System (HMIS). Throughout Orange County, an array of homeless service providers serves as access points. Access points include mobile street outreach teams, navigation centers, emergency shelters and a virtual front door. Access points are distributed geographically throughout the County in all three Service Planning Areas (North, Central, and South) and the virtual front door provides access 24 hours a day through a call center and online access.

To facilitate access to CES for veterans and people with disabilities, the VA and HCA are CES partners with the ability to conduct the standardized CES assessment and participate in the prioritization and referral process.

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Access Model

The Orange County CES is comprised of three systems: CES for Individuals, CES for Families and a Veteran Registry for Veterans. All CES systems work collaboratively and follow all CES policies and procedures.

Orange County CoC embraces a Housing First approach and, as such, CES, offers services and housing to people experiencing homelessness without preconditions (such as sobriety, mental health treatment, or a minimum income threshold) or service participation requirements. In the Housing First model, rapid placement and stabilization in permanent housing are primary goals.

Although there are separate systems for individuals and families, the Orange County CES offers a “no wrong door” approach with a standardized assessment at all access points. Initial standardized screening at each access point allows for immediate linkage to the appropriate subpopulation access point. This provides individuals and families experiencing homelessness a variety of avenues from which to access housing and supportive services, and no one is turned away.

Orange County CES does not prohibit or create barriers to available emergency services. Access to available emergency services are independent of the operating hours or coordinated intake and assessment processes for CES. Completing the standardized housing assessment is not a requirement and no individual or family will be denied access to the crisis response system based on willingness to participate in the assessment process. Regardless of people’s willingness to complete the standardized CES assessment, people will be warmly welcomed into emergency shelters and/or other emergency services, as available.

Accessibility

Orange County CES ensures that access points are accessible to all individuals, including those with disabilities and limited English proficiency. In cases where particular access points are inaccessible for participants for any reason including, but not limited to, structural barriers, language barriers, or transportation limitations, individuals and families will be accommodated at alternative access points or by a street outreach team with the appropriate auxiliary aids and services necessary to ensure effective communication and completion of the standardized assessment.

Safety Planning

Individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking need specialized assistance that promotes and protects their confidentiality and safety. Therefore, while they will have unencumbered access to emergency services and CES, appropriate and prompt referrals to services, including hotlines, and emergency shelters specializing in domestic violence are critical. The following domestic violence resources are available in Orange County:

Human Options	877-854-3594
Interval House	714-891-8121

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Laura's House	866-498-1511
Women Transitional Living Center	714-992-1931 877-531-5522
Sexual Assault Victim Services (North)	714-957-2737
Sexual Assault Victim Services (South)	949-831-9110
2-1-1 Orange County Helpline	211 949-646-4357 888-600-4357

Victim service providers are encouraged, but not required, to use CES and/or HMIS.

Virtual Access

Individuals or families experiencing homelessness or at-risk of experiencing homelessness can call 2-1-1 at any time, day or night, and will be connected with a certified multi-lingual referral specialist who can make referrals to appropriate emergency services based on individual and family service needs and Service Planning Area location.

ASSESSMENT

CES utilizes a standardized assessment process. The standardized assessment is separated into sections which assist in determining homelessness, vulnerability, strengths, barriers and other criteria related to eligibility for housing programs. The standardized CES assessment process is consistent across all access points including street outreach teams.

Prior to completing the standardized CES assessment, access points assess and address immediate needs followed by efforts to prevent homelessness or divert from experiencing ongoing homelessness. If referrals to housing resources available through CES are required, access point staff begin completing the CES assessment with the individual or family experiencing homelessness. The CES assessment may be completed during a single session or over time as immediate needs are addressed and rapport is developed between access point staff and the individuals or families experiencing homelessness.

If an individual is in crisis and requires and chooses shelter, the following steps must be taken:

- First, provide triage including diversion and prevention;
- Then, connect the individual or family with shelter as needed and capacity allows and;
- Finally, follow up to complete the CES assessment.

Safety planning is done for all individuals who may be in danger or could be a danger to themselves or others including identifying appropriate supports and resources. These needs are uncovered through the assessment and responded to immediately to quickly offer appropriate referral linkages. Accessors will be trained on how to understand when a person is at risk of harming themselves or others and serve as mandated reporters so that they are equipped to call 911 when necessary or connect individuals or families to a local hospital for crisis supports.

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CES assessments can and should be updated as contact information or life circumstances change to ensure a successful referral to an available housing resource and corresponding housing provider.

In support of the participant's self-determination and autonomy, CES participants are freely allowed to decide what information they provide during the assessment process, to refuse to answer assessment questions and to refuse housing and service options without retribution or limiting their access to other forms of assistance. Participants who decline to complete the CES assessment or provide incomplete information will be informed by the assessor that incomplete assessment information may limit housing opportunities if the incomplete questions are related to eligibility criteria for specific programs.

Unaccompanied minors (children ages 17 and younger) will be immediately connected to Casa Youth Shelter (800-914-2272) or Huntington Beach Youth Shelter (714-842-6600) for emergency shelter and supportive services. The standardized CES assessment may be completed with an unaccompanied minor, as appropriate.

Providers serving as access points have completed training on conducting the standardized CES assessment and entering data into HMIS. Updated training is provided at least annually. Ongoing support and training are available upon request and as resources permit.

The training covers CES policies and procedures including assessment procedures, prioritization, housing referrals, participant privacy, cultural and linguistic competency, safety planning and trauma-informed practices. Training resources are regularly reviewed and updated as needed but no less than once a year. Training is provided or coordinated by the County of Orange.

Each agency participating in CES will assign up to two staff as CES Agency Administrators. Agency Administrators will be required to attend an annual training provided or coordinated by the County of Orange for CES Agency Administrators. Agency Administrators are responsible for communication and training for all CES users and assessors within their organization. Agency Administrators are also responsible for quality assurance of assessments and communication with the County of Orange regarding staffing changes.

PRIORITIZATION

When the need for services is greater than resources available, CES utilizes an established prioritization schema approved by the CoC Board to connect individuals and families experiencing homelessness with available housing opportunities. Housing opportunities available through CES include Permanent Supportive Housing, Housing Choice Vouchers, Rapid Rehousing, and other housing opportunities as they become available. At minimum, all CoC and Emergency Solutions Grants (ESG) funded housing opportunities will prioritize individuals with the most urgent and severe needs on the CES prioritization list who are eligible for the housing opportunity. Other housing resources will be encouraged, but not required, to participate in CES if privately or alternatively funded.

The Orange County CES is integrated into the emergency response services in Orange County to meet basic needs, including emergency shelters and transitional shelters. Individuals and families experiencing homelessness or at-risk of homelessness should work with emergency service providers and/or call 2-1-1 to receive an initial referral to emergency services. Emergency

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response services will utilize the Orange County CES to connect individuals and families experiencing homelessness with available housing opportunities.

Prevention and diversion services are part of CES and may occur prior to engaging in CES or during the process of participating in CES for individuals and families experiencing homelessness or at risk of homelessness. Prevention and diversion are key components of CES that should be utilized in case management and housing plans for all individuals and families experiencing homelessness or at risk of homelessness in Orange County. Individuals and Families at-risk of homelessness and in need of homeless prevention services, should dial 2-1-1 to receive a referral to available homeless prevention services. In instances where there are no appropriate prevention referrals, 2-1-1 will attempt to connect participants to alternate resources.

CES prioritization is a dynamic process. CES will prioritize individuals and families with the longest length of homelessness in the community and highest service needs as determined using CES assessment tools and case conferencing. A regional Service Planning Area distribution prioritization based on the most recent finalized point in time count is used to distribute non-designated County resources by Service Planning Area to avoid forcing individuals or families to move long distances unless by participant choice.

The primary factors considered during prioritization is length of homelessness and permanent disabling conditions. Exceptions to the prioritization based on length of homelessness and disabling conditions may be made through case conferencing and as appropriate to meet specialized client needs. In addition, case conferencing will be employed to ensure housing resources are aligned to client needs and promote effective resource utilization.

All housing opportunities available through CES will prioritize chronically homeless individuals and families that are the most appropriate referral to the available resource. Chronically homeless individuals and families with the longest length of homelessness and with the most significant service needs will be prioritized over chronically homeless individuals and families with shorter lengths of homelessness and less significant needs following the prioritization process described above.

Housing opportunities provided by public housing authorities that are not funded through the CoC (ex. Housing Choice Vouchers) will be prioritized by CES in compliance with the administrative plan for each public housing authority jurisdiction. Prioritization and case conferencing will be used to refer individuals and families who are the most appropriate referral to the available resource.

Tenant-based and project-based PSH tenants are permitted to move between PSH opportunities and/or graduate to HCVs, as available and eligible. Movement between PSH opportunities is determined and agreed upon by the housing providers. Vacancies created through tenant movement must be refilled through CES using CES prioritization criteria.

Housing opportunities that serve a specific target population may receive referrals of that target population. To target a specific population outside of existing practices and community standards, housing providers must provide documentation to CES of receipt of funding that specifies the funder-defined targeting criteria prior to receiving a referral. Housing providers with targeted housing opportunities will receive referrals from CES that meet the stated targeting criteria, following the system wide prioritization policy for matches.

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Participants remain enrolled in CES until the participant is permanently housed, opts out of participating in CES, or becomes inactive. Participants will be made inactive on the prioritization list after 90 days of non-engagement with access points or participating agencies.

Scenario 1: CES receives 5 HCVs for non-elderly individuals. Based on the 2019 Point in Time results, homeless households were distributed throughout Orange County's Service Planning Areas as follows: 40% North, 49% Central, and 11% South. Therefore, the vouchers will be designated as follows: 2 North Service Planning Area, 2 Central Service Planning Area, and 1 South Service Planning Area. Individuals experiencing chronic homelessness with the longest lengths of homelessness are matched to these opportunities. If no individuals experiencing chronic homelessness are available, individuals with a permanent disabling condition experiencing homelessness with the longest lengths of homelessness will be considered followed by people without a permanent disabling condition with the longest lengths of homelessness.

Scenario 2: A project-based PSH unit becomes available in the North Service Planning Area for a family. Families experiencing chronic homelessness with the longest length of homelessness from the North Service Planning Area are considered first for this opportunity. If no families experiencing chronic homelessness from the North Service Planning Area are available, families experiencing chronic homelessness from any Service Planning Area will be considered followed by families experiencing homelessness with a head of household with a permanent disabling condition from the North Service Planning Area, and then families experiencing homelessness with a head of household with a permanent disabling condition from any Service Planning Area will be considered. Finally, families experiencing homelessness from the North Service Planning Area with the longest lengths of homelessness will be considered followed by families experiencing homelessness from any Service Planning Area.

Scenario 3: An RRH opportunity becomes available for homeless individuals. Individuals experiencing chronic homelessness with the longest lengths of homelessness are considered first for this opportunity. Then, individuals with a permanent disabling condition experiencing homelessness with the longest lengths of homelessness will be considered followed by people without a permanent disabling condition with the longest lengths of homelessness.

REFERRAL

Housing providers share available housing opportunities through HMIS or a comparable database selected by the County of Orange. Housing opportunities are discussed weekly at the Housing Placement Match Meetings (HPMM) and matched to eligible individuals and families as prioritized by the prioritization schema. The meetings are attended by participating access points, referral partners and housing providers. All information shared at the HPMM is private and confidential. To attend the HPMM, attendees are required to review client privacy and confidentiality requirements and attest to complying with the privacy and confidentiality requirements.

Upon referral to housing opportunities, access points will continue to support participants throughout the housing placement process and, ideally, for a month or more after housing placement to ensure housing stability is achieved.

Upon referral to housing opportunities, housing providers will provide an overview of program expectations including the share of rent and utility costs to participants and maintain regular communication with access point staff and CES. For RRH opportunities, the maximum amount of

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rent that a participant may pay can be up to 100% of the rental amount. In general, the goal will be that participants pay no more than 50% of their income in rent at RRH program completion.

When an individual or family declines a housing referral, the participant is returned to the prioritization list and remains on the prioritization list for a new housing referral. The individual or family will continue to be prioritized for available housing resources following the prioritization process previously described.

Housing providers may deny a referral from CES under any of the following circumstances:

- Inappropriate referral (ex. Accessibility needs cannot be met)
- Ineligible referral (ex. New intake information fails to meet eligibility requirements)
- Participant obtained other permanent housing
- Participant is unresponsive after multiple contact attempts to all available contact information

Referrals denied by housing providers must be made in writing or electronically in HMIS and include the reason for denying the referral as well as any information obtained during the referral process that ensures accurate participant information and helps improve future referral processes.

When an individual or family is denied by housing providers, the participant is returned to the prioritization list and remains on the prioritization list for a new housing referral. The individual or family will continue to be prioritized for available housing resources following the prioritization process previously described.

Housing provider denials may be contested by conference between the housing provider, the referring agency and the County of Orange. The referred individual or family may also be involved as able and appropriate.

EMERGENCY TRANSFER REQUEST POLICY

Per the Violence Against Women Act (VAWA), any household who is a victim of domestic violence, dating violence, human trafficking, sexual assault, or stalking can request an emergency transfer under the following circumstances:

- a. A sexual assault occurred on the premises of their HUD-funded housing program; or
- b. Who reasonably believed that they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, stalking, or human trafficking if they remain in that designated HUD-Funded dwelling.

A request for an emergency transfer, under these circumstances, does not guarantee immediate placement, but participants who qualify for an emergency transfer will be given a priority referral over all other applications for the next available, safe unit through CES for which they qualify.

If a household is currently enrolled in a HUD-funded housing program and requests an emergency transfer, the household must follow the housing agency's internal emergency transfer housing process. If the housing program is unable to accommodate the emergency transfer request, the housing program may request an emergency transfer via CES.

PRIVACY AND DATA MANAGEMENT

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CES, as an extension of HMIS, is required to comply with all HMIS policies and procedures. All agency staff participating in CES are required to sign and comply with all HMIS policies and procedures.

During CES assessment, assessors are required to obtain participant consent to disclose their information. As needed, consent may be obtained verbally but, ideally, consent will be provided in writing or electronically. When participants consent to disclose their information, they enhance the ability of CES to assess needs and make appropriate housing referrals. If consent is not obtained, services will not be denied.

In the case that full consent is not obtained, please note these special instructions: Do not enter personal identifiable information into HMIS. HMIS will automatically generate an anonymous ID. Please retain at least the first page of the CES assessment part I with the HMIS ID and participant name for your records and future housing referrals.

GRIEVANCE PROCESS

At any time during the coordinated entry process, participants have the right to file a complaint, should they feel that CES has not complied with the nondiscrimination and equal opportunity provisions of Federal civil rights law, fair housing laws and requirements, or the CES policies and procedures. During assessment, all CES participants will be provided with the process for filing a complaint. All complaints will be addressed in a timely and fair manner. The following three contacts are provided to participants for the purpose of addressing discrimination or grievance concerns:

- For grievances with Coordinated Entry System policies and procedures, contact Orange County Community Resources at CoordinatedEntry@ochca.com.
- For service provider related complaints, grievance should be directed to the appropriate service provider for resolution.
- For housing program related complaints, grievances should be directed to the appropriate housing provider for resolution.
- To file a discrimination complaint, contact the Department of Housing and Urban Development through the online portal: https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint

EVALUATION

CES will be regularly evaluated to analyze effectiveness and to identify areas for improvement. System performance metrics will be examined semi-annually, at minimum, to monitor adherence to system benchmarks. Length of time on priority list, placement rates, and returns to homelessness are sample metrics that will be used to understand system capacity and determine where additional resources are needed.

In addition, feedback will be solicited from CES participants and participating agencies through feedback surveys and focus groups. Participating agencies will be surveyed at least annually and focus group feedback opportunities will also be provided annually to solicit consumer feedback. Annually, all participants who utilize CES will be offered the chance to complete a feedback survey and/or participate in focus group feedback sessions held at geographically dispersed locations. The focus groups and surveys will cover all domains of the coordinated entry process, including

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intake, assessment and referral, and will be used to gauge participant and agency perception of system quality and effectiveness.

The County of Orange, as the lead CES agency, will collect participant and agency evaluations and analyze system performance. The information collected will be used to recommend updates to CES, in consultation with a committee of relevant stakeholders. This committee will meet at least annually to adopt and implement system changes.

For the purpose of the evaluation, data analyzed will be de-identified, and feedback will not require a name or other identifiable information. This will be used to ensure participant and participating agency privacy during the evaluation process.

CES DOCUMENTS AND REGULATIONS

The above policies and procedures replace all previous versions of the Coordinated Entry System (CES) policies and procedures and are intended to ensure that all agencies participating in the Orange County CES comply with the following regulations:

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

HUD Prioritization Notice CPD-16-11 – Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing

Continuum of Care (CoC) Program Interim Rule 24 CFR 578

Emergency Solutions Grants Interim Rule 24 CFR 576

HUD Equal Access rule: 24 CFR 5

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ATTACHMENT A – Homeless Definition

Information on the definition of homeless can be found on HUD Exchange at <https://www.hudexchange.info/resource/1928/hearth-defining-homeless-final-rule/> and is summarized below. The following four homeless categories are eligible to participate in CES.

Category 1. Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a 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 and local government programs); or
- Is exiting an institution where (s)he has 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

Category 2. Imminent Risk of Homelessness

Individual or family who will imminently lose their primary nighttime residence, provided that:

- Residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified; and
- The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 3. Homeless under other Federal statutes

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:

- Are defined as homeless under the other listed federal statutes;
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and
- Can be expected to continue in such status for an extended period of time due to special needs or barriers

Category 4. Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing

Orange County Coordinated Entry System: Prioritization and Assessment Best Practices & Recommendations

August 2021

Background

The Orange County (herein referred to as County) Continuum of Care (CoC) contracted with Homebase, a national technical assistance provider in the fields of housing and homelessness, to evaluate the County's Coordinated Entry System (CES), make recommendations for improvement, and provide initial assistance in implementing the recommendations. Homebase submitted detailed system maps along with process and policy improvement recommendations on June 30, 2021. Homebase staff has worked with the County CES Team to select several areas to provide more in-depth implementation assistance.

One area for more detailed recommendations was identified as the County's prioritization policies and the assessment tools and processes used to collect information for prioritization. This document provides an overview of each of these core elements of CES, along with specific evaluation findings and policy changes proposed by Homebase to address the findings. An appendix is also included with considerations for other approaches to prioritization and assessment.

Prioritization

Prioritization is the process through which resources are allocated to people experiencing homelessness in accordance with their level of need and/or vulnerability. An effective prioritization process that is responsive to local context and needs is important because resources are limited, so only a fraction of the population experiencing homelessness will receive housing or services.

Requirements

The U.S. Department of Housing and Urban Development's (HUD's) requirements for coordinated entry are detailed in [HUD Notice CPD-17-01](#). The Notice requires:

- CES must be used to prioritize people experiencing homeless for referral into housing programs.
- Prioritization must be based on factors that differ across households and relate to each household's relative capacity to obtain housing without the assistance.

Possible factors listed in the Notice include: significant challenges or functional impairments including a wide range of disabilities, high use of emergency services, unsheltered status, vulnerability to illness or death, likelihood of continued homelessness without assistance, vulnerability to victimization, and "other factors determined by the community based on the severity of needs."

The factors used by the community during the prioritization process must be described in the CoC's written policies and procedures for CES. The policies and procedures must also detail the standardized

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assessment process that is used to collect information on prioritization factors (these requirements are discussed in the “Assessment” section below).

Best & Emerging Practices

Prioritization is the key decision point of any CES. Beyond HUD’s requirements, Homebase recognizes several best and emerging practices around prioritization that every community should attempt to implement:



Prioritization should be **dynamic**, meaning that prioritized households are not tied to specific program types or projects that might never become available to them. Dynamic prioritization is a best practice supported by HUD and through HUD-sponsored resources, including this presentation on [Dynamic Prioritization and Real-Time Data Management](#).



CES should prioritize those persons/households with the **highest level of vulnerability**, regardless of their subpopulation groups (i.e. single adults, families with children, unaccompanied youth, survivors of domestic violence, and Veterans). The prioritization process should not allow people who are more vulnerable or who have more severe service needs to languish on the streets or in shelters because more intensive types of assistance are not available.



CoCs should ensure that prioritization **can be adjusted to account for changes** in resource availability and local conditions. During the COVID-19 pandemic, for example, HUD encouraged communities to prioritize households for housing based on vulnerability to the virus, rather than the factors they had used before the pandemic.



The CoC’s CES prioritization policy should **avoid overcomplications** requiring extensive information gathering through assessment process.

Current CES Policy and Processes in Orange County

According to the County’s current CES Policies and Procedures, the core prioritization factors are length of time homeless and shelter status, with sheltered households prioritized to encourage flow through the shelter system. The VI-SPDAT score can be used as a tie-breaker if two households have the same length of time homeless and shelter status. For individual adults, the top 10% of the by-name list is prioritized for housing opportunities regardless of shelter status to provide unsheltered individuals access to resources. Outside of the top 10%, sheltered individuals are first considered for opportunities.

The County’s prioritization policy meets the definition of “dynamic” described above, in that households are considered for any possible program type they may be eligible for (rather than tied to one intervention). Transfers between permanent housing programs are handled outside of the standard prioritization policy, and households are prioritized by Service Provider Areas (SPA) to ensure they are offered opportunities in the geographic area of their choice.

Evaluation Findings

Homebase identified the following areas for improvement in prioritization based on the evaluation:

- The prioritization of sheltered households puts unsheltered households at a disadvantage for housing resources. It is assumed that unsheltered status is a vulnerability in itself (as noted in HUD's list of possible prioritization factors), and thus should not be used to screen households out of housing opportunities.
- The use of the VI-SPDAT score as a tie-breaker in prioritization is unnecessary. Lengths of time homeless provide enough variance that the tie-breaker policy is rarely, if ever, used.

Proposed Policy Recommendations & Changes

Based on the findings above, Homebase recommends that the CoC:

- **Continues to use length of time homeless as the primary prioritization factor for CES.** Longer periods of time homeless, including experiences of chronic homelessness, often reflect more significant vulnerabilities and barriers to accessing housing and services that inhibit an individual's or family's ability to exit homelessness. For this reason, length of time homeless is often used as a primary prioritization factor for CES and a proxy for overall vulnerability and housing barriers experienced by the client or household.
- **Removes shelter status as a prioritization factor.** This change will help to ensure that in alignment with HUD expectations, persons experiencing homelessness are being prioritized based on vulnerability for those residing in both sheltered and unsheltered situations. This also removes the necessity for the "top 10%" prioritization used by the single adult CES system.

Assessment

Assessment is the process through which information is collected and documented regarding participant needs and strengths, barriers to housing, and participants' preferences and goals. The goal of prioritization-focused assessment is to prioritize people experiencing homelessness for housing and services through the local CES.

Requirements

HUD requires that each CoC incorporate a standardized assessment practice across its coordinated entry process. Regarding assessment, [HUD Notice CPD-17-01](#) requires:

- The same assessment process must be used at all access points within the CoC, except where necessary to meet the distinct needs of the following five HUD-designated populations:
 - Single adults
 - Families with children
 - Unaccompanied youth
 - Households fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions (including human trafficking)
 - Persons at imminent risk of literal homelessness for purposes of administering homelessness prevention assistance.

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- CES must allow participants to refuse to answer assessment questions and to reject housing and service options offered without facing retribution or limiting their access to assistance.
- The CoC must provide annual training for organizations and staff that conduct assessments.

The community's written CES Policies and Procedures need to include detailed information on the standardized assessment process. The policies and procedures must also outline a process for collecting necessary participant information when they refuse to answer one or more assessment questions and policies for assessment data collection, use and management.

Best & Emerging Practices

A clearly-defined assessment tool and process is necessary in order to prioritize/serve people fairly and in an individualized manner. Beyond HUD's requirements, Homebase recognizes several best and emerging practices in the assessment process that every community should attempt to implement:

	The standardized assessment process and tools should be trauma-informed and allow for collecting the minimum required information for prioritization. This may require implementing some form of phased assessment, which should be adapted to fit each community's unique CES.
	The exact formulation all questions asked of clients during the assessment process should follow from and be informed by the prioritization and referral process: <ul style="list-style-type: none">• What information is needed to complete the prioritization process?• Is there information we can collect that will assist providers in the timely completion of the referral and placement phases of CES?
	CoCs should ensure that diversion, housing-focused problem-solving, flexible fund resources, and other resources are available and accessible to participants throughout the assessment process.

It is important to highlight the national discussion around racial equity concerns in coordinated entry assessment tools, most notably the VI-SPDAT. The VI-SPDAT is used as a triage and assessment tool widely across the nation. Recent [research](#) has [suggested](#) that its results are not equitable in terms of race, finding White clients more vulnerable than non-White (and thus more likely to receive housing). In late 2020 one of the co-creators of the VI-SPDAT [suggested](#) that communities phase out its use over the coming years. In light of these developments, many communities are reconsidering their use of the VI-SPDAT as their primary assessment tool for coordinated entry.

Current CES Policy and Processes in Orange County

According to the County's current CES Policies and Procedures, the assessment process is described as "determining homelessness, vulnerability, strengths, barriers and other criteria related to eligibility for housing programs." The basic steps of the assessment process as outlined in the CES Policies and Procedures are:

- Triage including prevention/diversion
- Connect to shelter (if needed)
- CES assessment (VI-SPDAT)

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In alignment with HUD requirements, the assessment process is standardized across all access points, including outreach teams. The CoC has also established that access points must be trained on assessment process and provided updated training at least annually as required by [HUD Notice CPD-17-01](#). Finally, in alignment with best practice, it is a policy of the CoC to engage in prevention and diversion strategies with persons presenting for assistance prior to CES assessment and entry to the homeless crisis response system as needed.

Evaluation Findings

Homebase identified the following areas for improvement in the assessment process based on the evaluation:

- The score obtained from completing the VI-SPDAT is not used as part of the CES prioritization process, except to serve as a tie-breaker in exceedingly rare situations. Performing this assessment on every household requires massive amounts of time and resources from assessing agencies, and answering sensitive assessment questions is often traumatic for people experiencing homelessness.
- Information from particular VI-SPDAT questions is occasionally used by providers to inform in-program service and housing plans (post-enrollment).
- There is no standardized collection of housing barriers and preferences to inform the referral process outside of a form used by some providers serving families.
- Diversion is not universally implemented in the single adult CES system as part of the assessment process. As a result, assessors may be missing opportunities to connect clients to safe housing options outside of the homelessness response system, particularly for households that will not be prioritized for housing based on their level of vulnerability and need.

Proposed Policy Recommendations & Changes

Based on the findings above, Homebase recommends that the CoC:

- **Streamline the assessment process for both assessors and people experiencing homelessness by gathering only the information needed for prioritization or to assist with referral process.** The VI-SPDAT is not currently contributing to the CES prioritization and referral processes, therefore its use as an assessment tool should be phased out. Providers who use information from the VI-SPDAT to assist with housing and service planning should develop questionnaires or other tools to capture this information during program enrollment and outside of the CES assessment process.
- **Determine how to assess length of time homelessness.** As the primary prioritization factor for CES, it is important that the CoC define and standardize in the CES Policies and Procedures how this factor will be assessed, which may include self-reported information or data obtained through the participant's HMIS record. The CoC should consider which of these methods has the most complete and accurate data. Current CES practice uses a self-report value (the "approximate date homeless" question in HMIS data element 3.917) to inform the length of time homeless prioritization factor, so the CoC must ensure the highest possible data quality and completeness for this data. If the CoC has concerns about using self-reported data as the primary factor for prioritization, it could consider combining or averaging self-reported and verified (via HMIS enrollments) data values.
- **Standardize the collection of information to assist with referral and placement at assessment.** In addition to informing prioritization, CES assessment provides an opportunity to

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collect information that will help CES make appropriate referrals and assist housing providers with program enrollment and unit search. Referrals may end unsuccessfully due to housing barriers such as eviction history or criminal background, as well as client preferences like geographic location or reasonable accommodations for disability. Currently many access points serving families complete a "Housing Assessment Plan" form that collects much of this information. The CoC should review this form, update it as needed, and mandate its use at all access points serving all subpopulations.

- **Standardize diversion at assessment across all access points.** The assessment phase of CES provides an opportunity to engage clients in problem solving discussion that attempt to end their homelessness before a more intense commitment of resources.
- **Stay attuned to research and the national discussion around coordinated entry assessment.** Coordinated entry assessment is an area of interest to HUD and the entire field of homeless response. New research, guidance, or innovations may soon emerge that provide communities with the ability to assess vulnerability and other factors more accurately and equitably.

Appendix: Considerations for New Prioritization Factors

In this document Homebase recommended that the CoC use length of time homeless as the primary factor for prioritizing housing resources. The CoC should regularly monitor CES data as well as collect stakeholder feedback through the annual CES evaluation to understand how the prioritization policy is affecting system efficiency and equity in outcomes. Through these methods, the CoC may determine the length of time homeless is insufficient as a sole factor in prioritization. In that case, the CoC may decide to identify additional factors that will be used along with length of time homeless rather than adopting an off-the-shelf tool like the VI-SPDAT. This would allow the additional prioritization factors to be tailored to local needs and context. In addition, the CoC could engage a range of stakeholders in the selection process to ensure the new factors are informed by people with lived experience of homelessness and advance racial equity in service provision.

These prioritization factors should be connected to specific assessment questions asked of CES participants, which may be taken from the VI-SPDAT, newly created assessment questions, or other locally relevant information. Selecting factors aligned with individual data points currently collected in HMIS, or even VI-SPDAT questions themselves could provide continuity in a transition to a new assessment (i.e. clients already assessed with VI-SPDAT will have data on these factors). Examples include:

Prioritization Factor	Sample Assessment Question (VI-SPDAT)
Significant challenges or functional impairments, including a wide range of disabilities	Section D. Wellness (Physical Health, Substance Use, and Mental Health)
High use of emergency services	Question B.4 (Emergency Service Use)
Unsheltered status	Question A.1 (Most Frequent Sleeping Situation)
Vulnerability to illness or death	Section D. Wellness (Tri-Morbidity)
Likelihood of continued homelessness without assistance	Question A.2-3 (Length of Time / Episodes of Homelessness)
Vulnerability to victimization	Question B.5-6 (Risk of Harm) Question B.8-9 (Risk of Exploitation)

No matter what prioritization factors the CoC may select, assessment questions must be reconfigured, or new questions must be developed to collect the information needed to support the prioritization process. Every question included in the revised assessment tool should correspond to one or more CES prioritization factor and/or should be necessary to assist with the referral process. CES assessors, access point staff, and other assessing staff or agencies should also be promptly trained on changes to the assessment process once they are approved and implemented.

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2021 CES POLICY FEEDBACK & QUESTIONS

EMERGENCY TRANSFER REQUEST

What will be the process for a DV client to request for an emergency transfer?

Is there a chance that the adoption of the Emergency Housing Transfer policy would lead to more resources being available to this population?

Will verification and documentation for cases of Domestic Violence be needed for the Emergency Transfer Request policy? Does there need to be a police report?

How will the housing options for DV will be included in CES as part of the Emergency Transfer Request? Will they receive a priority under this new policy?

I wanted to follow up on the proposal for emergency transfers and the first bullet that stated a 90 day window for an assault to be a reason. My feedback would be a trauma informed approach would consider than many victims of assault can take quite a while to first come to terms with their assault, report their assault, have to deal with criminal system and then may be able to focus on other things. 90 days seems very short.

ASSESSMENT

Can the self-certification caps be extended to help address issues with case workers having difficulties capturing third-party verification of homelessness?

Can we immediately stop using the VI-SPDAT?

What information will be collected on the enrollment screen that will be used to determine prioritization?

The discussion around the CES policies should continue and you should continue to encourage feedback from providers. My agency is aligned with replacing the VI-SPDAT but would like to participate in an expanded discussion prior to the recommendation.

There is a TAY VISPDAT. I recommend that we use that version when working with TAY unless the VISPDAT is eliminated.

What type of information/data will be collected on the "program entry page" that will replace the VI-SPDAT?

If the system is moving toward using HMIS data on Length of Homeless as the primary form of assessment then I think it is imperative that agencies be trained on the HUD Data Standards around that HMIS field. Agencies may be interpreting this question in different ways and this inconsistency may unintentionally favor one client over another if interpreted differently. I am not sure who would be the entity within our CoC system that would need to ensure that this training happens but would

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imagine since it is HMIS and Entry Data, 2-1-1 would be seen as a valuable partner to ensure that agencies understand the logic behind the question and how to seek responses to it.

How will we refer individuals to CQ if VI-SPDAT is removed?

As far as general feedback around the policy changes:

- We are all in agreement that the removal of the VI-SPDAT assessment is a good change – that it can be too invasive, time-consuming, and re-traumatizing for both participants and staff.
 - Our program team did note it is important to have some type of assessment in place to assess vulnerability.
 - How else would we gauge vulnerability? Some type of additional needs assessment or updating of the enrollment questions in CES to include vulnerability-type questions would be nice to have.
 - CES meetings, if changes occur, would need to change the narrative on case conferencing and encourage service providers to give a more honest update on clients' vulnerabilities and/or barriers.
-

PRIORITIZATION

Prioritization Factors

Will chronically homeless clients continue to be prioritized?

The type of verification of homelessness could be an additional prioritization factor, such as: 1) Length of homelessness – 3rd Party Verification, 2) Length of homelessness – self-certified, 3) Length of homelessness – unverified.

What would be an alternative if our CoC did not use a tie breaker to distinguish between people with equal lengths of homelessness?

Instead of using the word “tie-breaker” the language should be replaced with something like “compensating factors.”

The system may inadvertently extend a household's length of homelessness by prioritizing those with the longer lengths, while ignoring other factors that could make the other households more vulnerable.

Only looking at the length of homelessness and not considering other factors such as age and disabling conditions would not be a good indicator of vulnerability.

Consider other complexities to determine vulnerability other than length of homelessness since each situation is more complex.

For prioritization, consider aging/disabilities with length of homelessness – a week being homeless is different from someone who is able-bodied. Disability should be considered.

For a prioritization tiebreaker – take eviction into account.

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The policy should consider people who are homeless due to eviction/at risk of eviction. CES should incorporate people who are displaced due to eviction. History of eviction could be considered a prioritization tiebreak factor. People with evictions are disproportionately affected because it is hard for them to obtain new housing.

Instead of length of homelessness, take disability and risk of eviction into account.

I like the prioritization of length of homelessness. A potential blindspot is extending someone's homelessness because they must wait for those with longer lengths of homelessness to be housed first.

Maybe we can prioritize those experiencing homelessness in specified SPA region? Individuals with the greatest length of homelessness in that particular area and consider those 'document ready' (also room for partners to advocate then community vote?). What is the success rate of those shelter to home vs. street to home? Will this be the same for TAY population?

For Feedback around what to do in the case of a tiebreaker (if length of homelessness is the same), focus on barriers and vulnerability.

I was thinking if this can be helpful, that for tiebreaking purposes, if the level of impairment in the community could be a factor to use. For example, if an unsheltered individual in the community is challenged by accessing resources in the community, symptoms interfere with taking a bus to meet with an outreach worker, physically limited due to wheelchair, etc.

I do understand the push to assist individuals on the street, however because we have limited housing units, funds and vouchers, it is very important to prioritize the individuals most in need of assistance. It appears to me that you are proposing to change the policy to prioritize an individual based on length of homelessness without considering other factors. If this is the case, an individual with underlying health issues, or an individual unable to make good decisions at the moment, or an individual who may never be self-sufficient, would not be prioritized over another person who is completely able to be self-sufficient, but choosing to live on the streets. I hope that I have misunderstood this recommended change, as it makes no sense to me to leave a person who is struggling on the street and to assist an individual who may have chosen the lifestyle of an urban camper.

I foresee more clients being helped and connected to housing opportunities if length of homelessness determines eligibility.

We should update the policies to reflect that we prioritize people experiencing "documented" chronic homelessness instead of only experiencing chronic homelessness.

How will CES determine who the high utilizers are since right now CES is able to determine this group by using the VI-SPDAT data?

Determining high utilizers may cause there to be a gap due to minorities being distrustful of resources and do not utilize the system. One value of the VI-SPIDAT is that it looks at utilizers of services. Bigger picture, how are we factoring in "high utilizers" as a vulnerability factor for tiebreakers?

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With utilization we do need to be mindful that minority communities are less likely to use formal healthcare and reluctant to report harmful behavior. Given historic racism, minority communities' distrust of health systems, and discriminatory policing practices.

Shelter Priority

Removing the shelter priority may create larger system implications.

Consider any data around the shelter preference being used to create system flow that would help view the overall impact.

Removing the shelter priority will help providers serve households that are unable or unwilling to access shelter resources due to trauma.

Do any of the shelter providers have concerns with the disruption of the system flow out of shelters if this priority is removed? Could this cause a bottleneck in services? Are we expecting a big shift of people entering shelters to receive a match?

Removing the shelter priority would allow for a more equitable distribution of resources.

If we discontinue the shelter preference, the shelter can be a source to verify homelessness (more than 3 months). Documentation of the length of homelessness is easier for those who are sheltered than those who are unsheltered.

Shelters are not always accessible, and the shelter preference should be removed. Not everyone has equal access to shelters.

Getting rid of shelter prioritization will be useful in serving individuals with mental illness and those who have difficulty engaging in a shelter setting.

Transitional Aged Youth (TAY)

I fear that using the length of homelessness as the only priority would place TAY at the bottom of the list and make it harder for this population to access housing resources.

Using Length of Homelessness as a priority would unintentionally cause TAY to become the least prioritized within CES.

How would this disproportionately affect TAY youth? They might not have as many years of homelessness- unintended consequence.

The TAY population has TAY-specific resources, wouldn't be competing for resources.

This is not new, there are regulations that are already written. It is up to the CES to prioritize populations. CES should use the HMIS system. The TAY population has their own funds designated for programs.

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The possibility of changing shelter prioritization to length of homelessness when connecting clients to housing opportunities could benefit the TAY population greatly. Many TAY are not in shelters or unable to find availability of shelters. For the TAY population specifically, there is little to no shelters catered towards this group of individuals, making it difficult for clients to go through to shelter funnel. If there are shelters, they may be catered towards specific genders or situations, leaving other individuals no shelter choice.

OTHER

What is CES is doing to ensure that accessible housing is being provided to households?

We should work to increase access to accessible housing. Consider providing clarification to ensure that those in need of accessible housing get it.

SUGGESTION: Provide clarification around each housing type and detail the accessibility as well. There are laws in place that there should be efforts made to locate a housing resource that can accommodate the household if the one given is not suitable.

Will the data sharing policies be reexamined since the VI-SPDAT will be eliminated now and additional data elements will be shared?

Will the Service Planning Area allocations be affected by a change in priority?

I am concerned about resources provided by SPA. If they are allocated equally there may be a disparity in some areas.

How can we get closer to each individual's and Family's needs? Connect with them to better understand their circumstances.

There are barriers in the referral process for rapid rehousing.

I wanted to give you some feedback I have received from the providers regarding homeless verification documentation. Several providers have mentioned how obtaining third party verification documentation is very challenging. For example, one provider mentioned that to try to contact a "soup kitchen" to verify receiving services there for a period of time is unlikely. The soup kitchens serve hundreds of individuals on a regular basis. Unlikely that they will recall this individual. Second example, if the provider can only provide 4 months of verified homeless history and the individual is chronically homeless and the individual did not access services/lived on the streets only, then how it was sad that only his/her self-certification of 3 months would be added to the history equaling 7 months of verified homeless history.

Date: December 14, 2021

Subject: Orange County Continuum of Care (CoC) Anti-Discrimination Policy Update

Recommended Actions:

- a. Approve the revised Anti-Discrimination Policy for the Orange County Continuum of Care (CoC), as requested by the Policies Procedures and Standards (PPS) committee.

Background and Analysis

During the PPS Committee held on Tuesday, October 12, 2021, the PPS Committee took action to recommend the Anti-Discrimination Policy the Orange County CoC for approval and implementation. Additionally, the PPS Committee requested that the Office of Care Coordination review all applicable laws and regulations for the State of California related to anti-discrimination, equal access, and fair housing and make any necessary updates to the Anti-Discrimination Policy. The Office of Care Coordination committed to bringing an updated policy to the PPS Committee for review and feedback.

Anti-Discrimination Policy for the Orange County CoC

The Orange County CoC is committed to providing housing and services in an environment in which all individuals are treated with respect and dignity and have equal treatment, and equal opportunity for housing and services. As such, the attached revised Anti-Discrimination Policy (Attachment A) is being recommended for review and approval by the PPS Committee.

Adoption of the revised Anti-Discrimination Policy will support the Orange County CoC in ensuring all people experiencing homelessness have equal access to the housing and services necessary to end their homelessness. Additionally, it would support the CoC in complying with federal nondiscrimination and equal opportunity provisions, as codified in the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, Titles II & III of the Americans with Disabilities Act, HUD's Equal Access to Housing Rule and Gender Identity Final Rule, 24 CFR 5.100, 5.105(a)(2) and 5.106(b).

Attachments

Attachment A – Orange County CoC Anti-Discrimination Policy – Redline Version

Attachment B – Orange County CoC Anti-Discrimination Policy – Clean Version

Orange County Continuum of Care Anti-Discrimination Policy

Overview

The Orange County Continuum of Care (CoC) is committed to providing housing and services in an environment in which all individuals are treated with respect and dignity, have equal treatment, and have equal opportunity for housing and services. The CoC's Anti-Discrimination Policy shall ensure all people experiencing homelessness have equal access to the housing and services necessary to end their homelessness.

The CoC's Anti-Discrimination Policies and Procedures apply to staff, volunteers, and contractors at all partner agencies, including all organizations and subrecipients that receive CoC funding from the U.S. Department of Housing and Urban Development (HUD). The CoC strongly encourage all CoC partners, regardless of funding source, to adopt Anti-Discrimination and Equal Access policies and procedures.

All agencies receiving CoC funds must manage their respective housing and service programs in accordance with federal nondiscrimination and equal opportunity provisions, as codified in the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, Titles II & III of the Americans with Disabilities Act, HUD's Equal Access to Housing Rule and Gender Identity Final Rule, 24 CFR 5.100, 5.105(a)(2) and 5.106(b), California Government Code Title 2, Article 9.5 Section 11135 - 11139.8, and California Civil Code, Division 1, Persons [38 - 86], Part 2 Personal Rights [43 - 53.7], also known as the Unruh Act.

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This includes establishing an Organizational Anti-Discrimination Policy and grievance procedures, and sharing all policy and procedures with participants, staff, volunteers, subrecipients, and contractors.

CoC-funded providers shall not discriminate against individuals or families on the basis of any protected characteristics, including race, ethnicity, color, national origin, citizenship, primary language, immigration status, ancestry, religion, sex, familial status, age, gender identity, sexual orientation, LGBTQ+ (lesbian, gay, bisexual, transgender, queer/questioning, non-binary, non-conforming, etc.) status, marital status, domestic or sexual violence victim status, mental or physical disability, medical condition or genetic information.

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The CoC's policies and procedures aim to ensure safety, dignity, and well-being of all individuals and families served by the CoC and all partner agencies. The following policies, procedures and corresponding documents include:

1. Anti-Discrimination Policy and Procedures (page 2)
2. Equal Access Policy and Procedures (page 3)
3. Family Separation Policy (page 4)
4. Faith-Based Inclusion Policy (page 5)
5. Grievance and Anti-Retaliation Policy and Procedures (page 5)
6. Appendix I: Agency Anti-Discrimination Policy Checklist (page 6)
7. Appendix II: References (page 7)

Orange County Continuum of Care Anti-Discrimination Policy

Anti-Discrimination Policy and Procedures

To ensure anti-discrimination policies for protected classes are in place and adhered to, the respective parties agree to providing the best welcoming, affirming, and safe housing and services provision possible.

The CoC shall:

1. Provide training and technical assistance to agencies regarding Anti-Discrimination and the Equal Access Rule related requirements, at least annually.
2. Use appropriate and inclusive language in communications, publications, trainings, personnel handbooks, and other policy documents that affirms the CoC's commitment to serving all eligible participants in adherence with the Anti-Discrimination laws and the HUD Equal Access Rule.
3. Ensure that communications and resources pertaining to housing and services are accessible to individuals with disabilities.
4. Continue to develop partnerships with organizations that can offer expertise regarding anti-discrimination to ensure gaining subject matter expertise, and best practices.
5. Support all participants in understanding their privacy rights and the implications of releasing information.

Providers Shall:

1. Make housing available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.
2. Will not restrict access to available housing and services available to otherwise eligible persons based on race, ethnicity, color, national origin, citizenship, primary language, immigration status, ancestry, religion, sex, familial status, age, gender identity, sexual orientation, LGBTQ+ (lesbian, gay, bisexual, transgender, queer/questioning, non-binary, non-conforming, etc.) status, marital status, domestic or sexual violence victim status, mental or physical disability, medical condition or genetic information.
3. Provide housing and services in accordance with a participant's gender identity, determine eligibility without regard to actual or perceived sexual orientation, gender identity, or marital status, and will serve all persons regardless of actual or perceived barriers to services.
4. Include policies and procedures in employee handbooks and training that prohibit discrimination and provide guidance to staff to ensure equal access to all groups to receive the organization's services.
5. Ensure staff, volunteers, and subrecipients are trained in the Equal Access Rule, and understand that an individual may present their gender differently than the way they identify.
6. Provide information and training to contractors, vendors, landlords and ensure that each receive the organization's policies and procedures regarding discrimination and treatment of all persons.
7. Ensure all staff, volunteers, and contractors maintain the confidentiality of a participant's legal name and sex at birth and understand the potential impact that disclosure can have on a participant's progress to self-sufficiency.
8. When possible, ensure that construction or property rehabilitation includes and promotes privacy and safety in sleeping areas, bathrooms, and showers.
9. Mediate and resolve conflicts between participants in a way that respects participants and treats individuals fairly and equally.

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Orange County Continuum of Care Anti-Discrimination Policy

10. Ensure every employee, volunteer, subrecipient, and participant is aware that discrimination will not be tolerated in any CoC-funded programs.
11. Take immediate action to resolve inappropriate behavior, treatment, harassment, or equal access issues by any person (staff, volunteers, contractors, or participants).
12. Follow the prescribed agency grievance policy as it relates to equal access in CoC programs.
13. Ensure that no individual is denied access to facilities, services, financial aid, or any other benefits based on protected status.
14. Shall not provide services that are different, or are provided in a different form, from that provided to others under the program or activity, unless doing so provides an accommodation based on one of the protected characteristics listed above to preserve the safety, dignity, and well-being of the individual or family being served.
15. Shall not subject any person to segregated or separate treatment in any facility or in any matter or process related to receipt of any service or benefit under the program or activity.
16. Will not restrict in any way access to, or the enjoyment of any advantage, or privilege enjoyed by others in connection with, facilities, services, financial aid, or other benefits under the program or activity.
17. Shall not treat any person differently from others in determining whether the person satisfies any admission, enrollment, eligibility, membership, or other requirement or condition, which individuals must meet to be provided shelter, services, or other benefits provided under the program or activity.
18. Shall not deny meaningful access to persons with limited English proficiency, to include failure to provide translated documents, notice of participant's rights, grievance forms, and other materials vital for program access. In addition, shall not fail to work with language services or an interpreter to assist persons who speak an alternate primary language other than the staff persons and whom may need assistance communicating.

Equal Access Policy and Procedures

The CoC prohibits all forms of harassment and discrimination of or by participants, employees, visitors, and volunteers, including harassment and discrimination based on actual or perceived gender identity and expression, or based on an individual's association. The CoC will continue to develop partnerships with organizations that can provide expertise around providing services to transgender and gender nonconforming individuals in a manner consistent with federal, state, and local laws.

Agencies, staff, volunteers, and contractors shall affirm commitment to providing equal access for all transgender and gender nonconforming individuals in a manner consistent with the HUD Equal Access Rule and provide services and housing to transgender and gender nonconforming individuals in a manner consistent with the HUD Equal Access Rule.

Transgender and Gender Nonconforming Procedures to maintain equal access, agencies and staff should:

1. Ensure all staff, volunteers, sub-recipients, contractors, or others having access to personally identifying information maintain the confidentiality of an individual's legal name and sex assigned at birth and understand the potential impact that disclosure can have on a participant's progress to self-sufficiency, staff relationships, personal safety, and organizational culture.

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Orange County Continuum of Care Anti-Discrimination Policy

2. Ensure that construction or property rehabilitation includes and promotes privacy and safety in sleeping areas, bathrooms, and showers.
3. Offer individual stalls in congregate bathrooms, urinals/toilets, and shower heads to support participant safety whenever possible.
4. Offer individual gender-neutral bathrooms and gender-neutral shower rooms, where feasible.
5. Not consider an individual or potential participant ineligible because they feel their appearance or behavior does not conform to gender stereotypes and will serve all individuals eligible for the program.
6. Not ask questions or seek information concerning a person's anatomy and only seek the most necessary elements of information regarding a person's medical history for the purpose of providing services.
7. Have a preference to move the participant with a bias (e.g., move the individual who has concerns towards the person who may identify as another religion that is different from theirs). If a participant needs to be moved for harassment and safety concerns the program administrator shall consider moving the harasser and not the harassed.
8. Honor the request of an individual for a private space to complete intake and data collection.
9. Honor the request of an individual for accommodations based on their personal safety and privacy concerns, whenever feasible. An "accommodation" will not be given as a "requirement." This might include a private sleeping area or access to a single-use bathroom if possible.
10. Not require an individual's gender identity or name to match the gender or name listed on an ID or other documents.
11. Assist participants without identification documents in understanding the resources available to obtain said documents.
12. Make available intake materials that allow individuals to indicate their legal name and the name they prefer to be called. All staff and volunteers should use the preferred name and pronouns, even if it is different from a legal name and legal name should be kept private and confidential.
13. Homeless Management Information System (HMIS) participating agencies should enter the participants preferred name.
14. Use the participant's preferred gender and pronoun and support the participant's gender identity.
15. Correct any misinformation or inaccurate conclusions that transgender participants threaten the health or safety of other participants solely based on their nonconforming gender identity/expression during risk-based conversations.
16. Keep participant's transgender or other status confidential, unless the participant gives permission to share this information. Tell only essential staff that will provide services or housing to participant as identified by administrators, regarding a participant's transgender status to ensure equal access and safety.

Family Separation Policy

In compliance with CoC Program Interim Rule 24 CFR § 578.93 (e); 24 CFR § 578.23 (c)(iii)(iv), involuntary family or household separation is prohibited in CoC-funded projects. Families, households with children under the age of 18, shall not be denied admission or separated when entering housing.

In addition, CoC-funded projects may not deny admission to any household on the basis of:

1. Age and gender of a child under 18.

Orange County Continuum of Care Anti-Discrimination Policy

2. Gender or marital status of a parent or parents.
3. Household composition.

The CoC will work with providers to ensure placement efforts are coordinated to avoid involuntary family separation. Any person who believes that they or a family member has experienced involuntary family separation may report the issue to CoC staff at the CoC at: carecoordination@ochca.com. The CoC will investigate the claim and take remedial action when appropriate.

Faith-Based Activities Policy

CoC agencies and staff, volunteers, or contractors shall not, in providing program assistance, discriminate against a program participant or prospective participant on the basis of religion or religious belief. In providing services supported in whole or part with federal financial assistance and in outreach activities related to such services. CoC-funded programs shall not discriminate against current or prospective program beneficiaries on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

Grievance and Anti-Retaliation Policy

Anyone participating in the CoC has the right to file a grievance if they have a complaint about the provision of housing and services. The CoC affirms that people who wish to file a grievance have the right to do so without retaliation from the party accused or any associated representative.

Retaliation includes, but is not limited to: harassment, intimidation, violence, program dismissal, refusing to provide services, use of profane or derogatory language to or in reference to the complainant, or breach of contract.

Grievance Procedures: At intake, orientation or employment, all participants, staff, volunteers, and contractors should be provided the program's Anti-Discrimination Policy and should be informed of the program's grievance process.

1. Anyone can submit a complaint form initially to program administration.
2. Program administration will address the grievance with the provider and the participant, staff, volunteer, or contractor. Staff, contractors, or volunteers involved in the grievance shall not make decisions regarding the grievance. If the grievance is against a program administrator, the agency should have an objective representative body, such as a Board Executive Committee, hear and make decisions about the grievance.
3. If a participant is not satisfied with the outcome or if a participant fears retaliation at the program level, a complaint can be filed with CoC staff at carecoordination@ochca.com.
4. If a participant feels they have been discriminated against, they should be advised that they also have the right to file a complaint with the U.S. Department of Housing & Urban Development at: https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint.

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Orange County Continuum of Care Anti-Discrimination Policy

Appendix I. Checklist for Agency Anti-Discrimination Policies

Yes	No	Questions	Notes
		Does your agency have an Anti-Discrimination policy?	
		Is there a stated plan to train new staff, volunteers, board members, and contractors to clearly communicate the anti-discrimination policy during the onboarding process?	
		Is annual training regarding anti-discrimination provided for staff, volunteers, and contractors?	
		Does the intake process for participants include providing a copy of the agency's anti-discrimination policy to people presenting for services?	
		Does the policy refer to the U.S. Department of Housing and Urban Development Anti-Discrimination, Equal Access Rule, privacy laws, and all other federal, state, and local non-discrimination laws?	
		Is there a clear statement about non-discrimination due to race, ethnicity, color, national origin, language, ancestry, religion, sex, familial status, age, gender identity, LGBTQ+ status, marital status, domestic or sexual violence victim status, or disability?	
		Is there an equal access policy?	
		If there is an equal access policy, does it include specific procedures for working with transgender and nonconforming persons?	
		Is there a family separation policy?	
		Is there a faith-based activities policy?	
		Are procedures spelled out that demonstrate how the participants, agency, staff, volunteers, and contractors will carry out the agency's anti-discrimination policies?	
		Are there grievance and anti-retaliation policies and procedures?	
		Do participants know how to file a complaint with the CoC and/or HUD?	

Item V. Attachment A

Orange County Continuum of Care Anti-Discrimination Policy

Appendix II. References

All agencies must manage a responsible and sound operation in accordance with federal and local nondiscrimination and equal opportunity provisions, as codified in:

The Fair Housing Act - [Fair Housing Act](#)

Section 504 of the Rehabilitation Act - [Rehabilitation Act](#)

Title VI of the Civil Rights Act - <https://www.justice.gov/crt/fcs/TitleVI-Overview>

Titles II & III of the Americans with Disabilities Act - https://www.ada.gov/2010_regs.html

HUD's Equal Access to Housing Rule and Gender Identity Final Rule, 24 CFR 5.100, 5.105(a)(2) and 5.106(b). - <https://www.federalregister.gov/documents/2012/02/03/2012-2343/equal-access-to-housing-in-hud-programs-regardless-of-sexual-orientation-or-gender-identity>

California Government Code Title 2, Article 9.5 Section 11135 - 11139.8

California Civil Code, Division 1, Persons [38 - 86], Part 2 Personal Rights [43 - 53.7], also known as the Unruh Act.

Commented [dh12]: Added

This includes establishing an Agency Anti-Discrimination Policy and grievance procedures and sharing all policy and procedures with participants, staff, volunteers, and contractors.

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Orange County Continuum of Care Anti-Discrimination Policy

Overview

The Orange County Continuum of Care (CoC) is committed to providing housing and services in an environment in which all individuals are treated with respect and dignity, have equal treatment, and have equal opportunity for housing and services. The CoC's Anti-Discrimination Policy shall ensure all people experiencing homelessness have equal access to the housing and services necessary to end their homelessness.

The CoC's Anti-Discrimination Policies and Procedures apply to staff, volunteers, and contractors at all partner agencies, including all organizations and subrecipients that receive CoC funding from the U.S. Department of Housing and Urban Development (HUD). The CoC strongly encourage all CoC partners, regardless of funding source, to adopt Anti-Discrimination and Equal Access policies and procedures.

All agencies receiving CoC funds must manage their respective housing and service programs in accordance with federal nondiscrimination and equal opportunity provisions, as codified in the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, Titles II & III of the Americans with Disabilities Act, HUD's Equal Access to Housing Rule and Gender Identity Final Rule, 24 CFR 5.100, 5.105(a)(2) and 5.106(b), California Government Code Title 2, Article 9.5 Section 11135 - 11139.8, and California Civil Code, Division 1, Persons [38 - 86], Part 2 Personal Rights [43 - 53.7], also known as the Unruh Act.

This includes establishing an Organizational Anti-Discrimination Policy and grievance procedures, and sharing all policy and procedures with participants, staff, volunteers, subrecipients, and contractors.

CoC-funded providers shall not discriminate against individuals or families on the basis of any protected characteristics, including race, ethnicity, color, national origin, citizenship, primary language, immigration status, ancestry, religion, sex, familial status, age, gender identity, sexual orientation, LGBTQ+ (lesbian, gay, bisexual, transgender, queer/questioning, non-binary, non-conforming, etc.) status, marital status, domestic or sexual violence victim status, mental or physical disability, medical condition or genetic information.

The CoC's policies and procedures aim to ensure safety, dignity, and well-being of all individuals and families served by the CoC and all partner agencies. The following policies, procedures and corresponding documents include:

1. Anti-Discrimination Policy and Procedures (page 2)
2. Equal Access Policy and Procedures (page 3)
3. Family Separation Policy (page 4)
4. Faith-Based Inclusion Policy (page 5)
5. Grievance and Anti-Retaliation Policy and Procedures (page 5)
6. Appendix I: Agency Anti-Discrimination Policy Checklist (page 6)
7. Appendix II: References (page 7)

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Orange County Continuum of Care Anti-Discrimination Policy

Anti-Discrimination Policy and Procedures

To ensure anti-discrimination policies for protected classes are in place and adhered to, the respective parties agree to providing the best welcoming, affirming, and safe housing and services provision possible.

The CoC shall:

1. Provide training and technical assistance to agencies regarding Anti-Discrimination and the Equal Access Rule related requirements, at least annually.
2. Use appropriate and inclusive language in communications, publications, trainings, personnel handbooks, and other policy documents that affirms the CoC's commitment to serving all eligible participants in adherence with the Anti-Discrimination laws and the HUD Equal Access Rule.
3. Ensure that communications and resources pertaining to housing and services are accessible to individuals with disabilities.
4. Continue to develop partnerships with organizations that can offer expertise regarding anti-discrimination to ensure gaining subject matter expertise, and best practices.
5. Support all participants in understanding their privacy rights and the implications of releasing information.

Providers Shall:

1. Make housing available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.
2. Will not restrict access to available housing and services available to otherwise eligible persons based on race, ethnicity, color, national origin, citizenship, primary language, immigration status, ancestry, religion, sex, familial status, age, gender identity, sexual orientation, LGBTQ+ (lesbian, gay, bisexual, transgender, queer/questioning, non-binary, non-conforming, etc.) status, marital status, domestic or sexual violence victim status, mental or physical disability, medical condition or genetic information.
3. Provide housing and services in accordance with a participant's gender identity, determine eligibility without regard to actual or perceived sexual orientation, gender identity, or marital status, and will serve all persons regardless of actual or perceived barriers to services.
4. Include policies and procedures in employee handbooks and training that prohibit discrimination and provide guidance to staff to ensure equal access to all groups to receive the organization's services.
5. Ensure staff, volunteers, and subrecipients are trained in the Equal Access Rule, and understand that an individual may present their gender differently than the way they identify.
6. Provide information and training to contractors, vendors, landlords and ensure that each receive the organization's policies and procedures regarding discrimination and treatment of all persons.
7. Ensure all staff, volunteers, and contractors maintain the confidentiality of a participant's legal name and sex at birth and understand the potential impact that disclosure can have on a participant's progress to self-sufficiency.
8. When possible, ensure that construction or property rehabilitation includes and promotes privacy and safety in sleeping areas, bathrooms, and showers.
9. Mediate and resolve conflicts between participants in a way that respects participants and treats individuals fairly and equally.

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Orange County Continuum of Care Anti-Discrimination Policy

10. Ensure every employee, volunteer, subrecipient, and participant is aware that discrimination will not be tolerated in any CoC-funded programs.
11. Take immediate action to resolve inappropriate behavior, treatment, harassment, or equal access issues by any person (staff, volunteers, contractors, or participants).
12. Follow the prescribed agency grievance policy as it relates to equal access in CoC programs.
13. Ensure that no individual is denied access to facilities, services, financial aid, or any other benefits based on protected status.
14. Shall not provide services that are different, or are provided in a different form, from that provided to others under the program or activity, unless doing so provides an accommodation based on one of the protected characteristics listed above to preserve the safety, dignity, and well-being of the individual or family being served.
15. Shall not subject any person to segregated or separate treatment in any facility or in any matter or process related to receipt of any service or benefit under the program or activity.
16. Will not restrict in any way access to, or the enjoyment of any advantage, or privilege enjoyed by others in connection with, facilities, services, financial aid, or other benefits under the program or activity.
17. Shall not treat any person differently from others in determining whether the person satisfies any admission, enrollment, eligibility, membership, or other requirement or condition, which individuals must meet to be provided shelter, services, or other benefits provided under the program or activity.
18. Shall not deny meaningful access to persons with limited English proficiency, to include failure to provide translated documents, notice of participant's rights, grievance forms, and other materials vital for program access. In addition, shall not fail to work with language services or an interpreter to assist persons who speak an alternate primary language other than the staff persons and whom may need assistance communicating.

Equal Access Policy and Procedures

The CoC prohibits all forms of harassment and discrimination of or by participants, employees, visitors, and volunteers, including harassment and discrimination based on actual or perceived gender identity and expression, or based on an individual's association. The CoC will continue to develop partnerships with organizations that can provide expertise around providing services to transgender and gender nonconforming individuals in a manner consistent with federal, state, and local laws.

Agencies, staff, volunteers, and contractors shall affirm commitment to providing equal access for all transgender and gender nonconforming individuals in a manner consistent with the HUD Equal Access Rule and provide services and housing to transgender and gender nonconforming individuals in a manner consistent with the HUD Equal Access Rule.

Transgender and Gender Nonconforming Procedures to maintain equal access, agencies and staff should:

1. Ensure all staff, volunteers, sub-recipients, contractors, or others having access to personally identifying information maintain the confidentiality of an individual's legal name and sex assigned at birth and understand the potential impact that disclosure can have on a participant's progress to self-sufficiency, staff relationships, personal safety, and organizational culture.

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Orange County Continuum of Care Anti-Discrimination Policy

2. Ensure that construction or property rehabilitation includes and promotes privacy and safety in sleeping areas, bathrooms, and showers.
3. Offer individual stalls in congregate bathrooms, urinals/toilets, and shower heads to support participant safety whenever possible.
4. Offer individual gender-neutral bathrooms and gender-neutral shower rooms, where feasible.
5. Not consider an individual or potential participant ineligible because they feel their appearance or behavior does not conform to gender stereotypes and will serve all individuals eligible for the program.
6. Not ask questions or seek information concerning a person's anatomy and only seek the most necessary elements of information regarding a person's medical history for the purpose of providing services.
7. Have a preference to move the participant with a bias (e.g., move the individual who has concerns towards the person who may identify as another religion that is different from theirs). If a participant needs to be moved for harassment and safety concerns the program administrator shall consider moving the harasser and not the harassed.
8. Honor the request of an individual for a private space to complete intake and data collection.
9. Honor the request of an individual for accommodations based on their personal safety and privacy concerns, whenever feasible. An "accommodation" will not be given as a "requirement." This might include a private sleeping area or access to a single-use bathroom if possible.
10. Not require an individual's gender identity or name to match the gender or name listed on an ID or other documents.
11. Assist participants without identification documents in understanding the resources available to obtain said documents.
12. Make available intake materials that allow individuals to indicate their legal name and the name they prefer to be called. All staff and volunteers should use the preferred name and pronouns, even if it is different from a legal name and legal name should be kept private and confidential.
13. Homeless Management Information System (HMIS) participating agencies should enter the participants preferred name.
14. Use the participant's preferred gender and pronoun and support the participant's gender identity.
15. Correct any misinformation or inaccurate conclusions that transgender participants threaten the health or safety of other participants solely based on their nonconforming gender identity/expression during risk-based conversations.
16. Keep participant's transgender or other status confidential, unless the participant gives permission to share this information. Tell only essential staff that will provide services or housing to participant as identified by administrators, regarding a participant's transgender status to ensure equal access and safety.

Family Separation Policy

In compliance with CoC Program Interim Rule 24 CFR § 578.93 (e); 24 CFR § 578.23 (c)(iii)(iv), involuntary family or household separation is prohibited in CoC-funded projects. Families, households with children under the age of 18, shall not be denied admission or separated when entering housing.

In addition, CoC-funded projects may not deny admission to any household on the basis of:

1. Age and gender of a child under 18.

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Orange County Continuum of Care Anti-Discrimination Policy

2. Gender or marital status of a parent or parents.
3. Household composition.

The CoC will work with providers to ensure placement efforts are coordinated to avoid involuntary family separation. Any person who believes that they or a family member has experienced involuntary family separation may report the issue to CoC staff at the CoC at: carecoordination@ochca.com. The CoC will investigate the claim and take remedial action when appropriate.

Faith-Based Activities Policy

CoC agencies and staff, volunteers, or contractors shall not, in providing program assistance, discriminate against a program participant or prospective participant on the basis of religion or religious belief. In providing services supported in whole or part with federal financial assistance and in outreach activities related to such services. CoC-funded programs shall not discriminate against current or prospective program beneficiaries on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

Grievance and Anti-Retaliation Policy

Anyone participating in the CoC has the right to file a grievance if they have a complaint about the provision of housing and services. The CoC affirms that people who wish to file a grievance have the right to do so without retaliation from the party accused or any associated representative.

Retaliation includes, but is not limited to: harassment, intimidation, violence, program dismissal, refusing to provide services, use of profane or derogatory language to or in reference to the complainant, or breach of contract.

Grievance Procedures: At intake, orientation or employment, all participants, staff, volunteers, and contractors should be provided the program's Anti-Discrimination Policy and should be informed of the program's grievance process.

1. Anyone can submit a complaint form initially to program administration.
2. Program administration will address the grievance with the provider and the participant, staff, volunteer, or contractor. Staff, contractors, or volunteers involved in the grievance shall not make decisions regarding the grievance. If the grievance is against a program administrator, the agency should have an objective representative body, such as a Board Executive Committee, hear and make decisions about the grievance.
3. If a participant is not satisfied with the outcome or if a participant fears retaliation at the program level, a complaint can be filed with CoC staff at carecoordination@ochca.com.
4. If a participant feels they have been discriminated against, they should be advised that they also have the right to file a complaint with the U.S. Department of Housing & Urban Development at: https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint.

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**Orange County Continuum of Care
Anti-Discrimination Policy**

Appendix I. Checklist for Agency Anti-Discrimination Policies

Yes	No	Questions	Notes
		Does your agency have an Anti-Discrimination policy?	
		Is there a stated plan to train new staff, volunteers, board members, and contractors to clearly communicate the anti-discrimination policy during the onboarding process?	
		Is annual training regarding anti-discrimination provided for staff, volunteers, and contractors?	
		Does the intake process for participants include providing a copy of the agency's anti-discrimination policy to people presenting for services?	
		Does the policy refer to the U.S. Department of Housing and Urban Development Anti-Discrimination, Equal Access Rule, privacy laws, and all other federal, state, and local non-discrimination laws?	
		Is there a clear statement about non-discrimination due to race, ethnicity, color, national origin, language, ancestry, religion, sex, familial status, age, gender identity, LGBTQ+ status, marital status, domestic or sexual violence victim status, or disability?	
		Is there an equal access policy?	
		If there is an equal access policy, does it include specific procedures for working with transgender and nonconforming persons?	
		Is there a family separation policy?	
		Is there a faith-based activities policy?	
		Are procedures spelled out that demonstrate how the participants, agency, staff, volunteers, and contractors will carry out the agency's anti-discrimination policies?	
		Are there grievance and anti-retaliation policies and procedures?	
		Do participants know how to file a complaint with the CoC and/or HUD?	

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Orange County Continuum of Care Anti-Discrimination Policy

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