

Allegheny County Coordinated Entry Policies & Procedures

March 2024

DEFINITIONS AND ACRONYMS

Allegheny County Department of Human Services (ACDHS or DHS): ACDHS/DHS is the Lead Agency who administers HMIS and serves as the CoC Collaborative Applicant.

Allegheny Housing Assessment (AHA): The AHA is a decision support tool designed to help prioritize admissions to supportive housing services for individuals and families experiencing homelessness. <https://www.alleghenycounty.us/Human-Services/News-Events/Accomplishments/Allegheny-Housing-Assessment.aspx>

Allegheny Housing Stabilization Collaborative (AHSC): The AHSC program is housed at ACTION Housing and is the CoC's eviction prevention program. Homeless Assistance Program (HAP) funding, Block Grant Funding, and Housing Stabilization Program funding are all part of this larger program.

Homeless and Housing Services: Allegheny County Department of Human Services' Office of Community Services houses the teams that administer Coordinated Entry functions as well as the monitoring support as the funder for programs serving people experiencing homelessness.

Coordinated Entry System (CES) & Coordinated Entry (CE): A Coordinated Entry System is an evidence-based strategy that focuses on housing and service coordination to ensure all people experiencing a housing crisis have fair and equal access and are linked to the most appropriate housing solution based on their needs.

HUD Chronically Homeless (CH): The definition of "chronically homeless" currently in effect is that which is defined in the [Final Rule 24 CFR Parts 91 and 578](#) which states that a chronically homeless person is:

1. An individual who:
 - a) Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

- b) Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months. Occasions are separated by a break of at least seven nights.
- c) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition before entering that facility; or

3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless. In order for a family to qualify as chronically homeless, the Head of Household must have a documented disability.

Continuum of Care (CoC): The CoC is the county's community-based homeless services planning network, organized to carry out the responsibilities required under the CoC Program Interim Rule (24 CFR Part 578) and is comprised of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, and law enforcement, and organizations that serve homeless and formerly homeless persons to the extent that these groups are represented

Emergency Solutions Grant (ESG): HUD funding source to (1) engage homeless individuals and families living on the street; (2) improve the quantity and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential

services to shelter residents; (5) rapidly rehouse homeless individuals and families; and (6) prevent families and individuals from becoming homeless.

Homeless Advisory Board (HAB): The HAB is the working board that acts on the behalf of the Allegheny County CoC. It is comprised of representatives of relevant organizations and projects serving homeless subpopulations, at least one individual who is currently or has formerly experienced homelessness, and other stakeholders and local funders of the CoC.

Homeless Assistance Programs (HAP): HAP is administered by the state of Pennsylvania. HAP administers funding for case management, rental assistance, bridge housing, emergency shelter, and innovative supportive housing programs. It is part of the Human Services Block Grant.

Homeless: The [Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\) Act Final Rule](#) defines a homeless person or family as:

1. Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or a place not meant for human habitation immediately before entering that institution;
2. Individuals and families who will imminently lose their primary nighttime residence;
3. Unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition;¹ or
4. Individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member.

Homeless Management Information System (HMIS): HMIS is the information system designated by a local Continuum of Care (CoC) to comply with the requirements of CoC Program interim rule 24 CFR 578. Local information technology system used by a CoC to collect participant-level data and data on the provision of housing and services to homeless individuals and families and to persons at risk of homelessness. Each CoC is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards. HMIS is a valuable resource because of its capacity to integrate and unduplicated data across projects in a community. Aggregate HMIS data can be used to understand the size, characteristics, and needs of the homeless population at multiple levels: project, system, local, state, and national.

Housing First: The guiding principle for the homeless system that prioritizes providing housing to people experiencing homelessness so that housing can serve as a platform from which they can pursue personal goals and improve their quality of life. This approach is guided by the belief that people can better address complex life challenges -- getting a job, budgeting properly or attending to unhealthy substance use issues -- after their basic needs are met: food and a safe, permanent place to live.

Penn-Free Bridge Housing: A housing program designed to serve individuals and families with members who have a history of unhealthy substance use and who are experiencing homelessness. Penn-Free Bridge Housing provides rental assistance and supportive services for up to one year with the goal of successfully exiting the program to permanent housing.

U.S. Department of Housing and Urban Development (HUD): The Department of Housing and Urban Development is the Federal agency responsible for national policy and programs that address America's housing needs, that improve and develop the Nation's communities, and enforce fair housing laws.

REVISION AND REVIEW POLICY

The CoC's Coordinated Entry policies and procedures governing assessment, eligibility determinations, and prioritization are to be in accordance with the CoC's written standards for administering CoC and ESG Program Funds. This is the link to the CoC written standards:

INSERT LINK HERE

This is not an operational manual and does not lay out step-by-step procedures for implementation of these policies. Since this document does not include those operational policies, it is not expected that it will require frequent updates. This document will be updated as needed when there are significant changes to CE policies.

Additionally, the Homeless Advisory Board (HAB), the governance body for the CoC, will review and approve the policies and procedures annually.

ACCESSING COORDINATED ENTRY

Introduction

The Allegheny County Coordinated Entry System (CES) covers Allegheny County in its entirety. The objective of the CES is to ensure streamlined access to the Allegheny County Continuum of Care's (CoC) homeless response system for all households that are facing housing instability or experiencing homelessness and ensure they are matched to an appropriate intervention to end their crisis or homelessness. Subjective barriers to housing have been removed from all programs participating in Allegheny County's CES, as there is a Housing First focus, that is inclusive of those funded through the CoC Grant and Emergency Solutions Grant (ESG). The CoC has adopted HUD CPD 16-11, HUD's *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing*, as well as the accompanying update HUD CPD-17-01, *Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System*. (Links to those documents found below). The Allegheny Link & Office of Community Services (OCS) Field Unit function as the single access point for the CE in Allegheny County. All households seeking service are provided fair and equal access regardless of their location or method by which they access the system.

All CoC Program and ESG Program-funded projects are required to participate in Allegheny County's Coordinated Entry.

When accessing Coordinated Entry persons experiencing homelessness can expect:

- to be treated with dignity and respect
- to receive fair and equal access to information and guidance about housing assistance for which they are eligible
- to be screened for integrated services through all CoC participating providers and programs

Coordinated Entry Access & Coverage

The Allegheny County CoC is a consistent, streamlined approach to Coordinated Entry. The CE is comprised of the Allegheny Link and the OCS Field Unit. The Allegheny Link is the one-stop access point for Coordinated Entry and serves the entire geographic region of Allegheny County and PA-600. The Allegheny Link Service Coordinators are available weekdays from 8:00 am to 5:00 pm. The Allegheny Link can be accessed in multiple ways:

- By Phone: 1-866-730-2368
- In Person: Allegheny Link, One Smithfield Street Pittsburgh, PA 15222 (8 am to 4 pm)
- By Email: alleghenylink@alleghenycounty.us

Through partnership and collaboration, other call centers and community service providers e.g., 211, AAA SeniorLine, resolve, food pantries, 412 Youth Zone, engagement centers, etc., assist households in connecting to Allegheny Link. This occurs through warm transfers of the households to the phone line, emails directly to Allegheny Link or connection to the OCS Field Unit.

Coordinated Entry Outreach (OCS Field Unit)

The OCS Field Unit acts as a bridge between those who are street homeless and unable to contact Allegheny Link through any of the three-mentioned means. The OCS Field Unit consists of skilled field service coordinators who partner with Street Outreach Teams to bring CE to those who are unsheltered. Additionally, the OCS Field Unit has regularly scheduled hours at many of the day drop-in centers, medical clinics and libraries where people experiencing homelessness may visit. The locations and hours are communicated to the public via the Allegheny County Department of Human Service (DHS) website and emails to distribution lists. Street Outreach providers can connect directly with the OCS Field Unit to ensure that those who are encountered on the street are prioritized in the same manner as others who are accessing the CE.

Accessing Emergency Shelter for Single Individuals

Single individuals who do not have a safe place to stay that evening can access the shelters by presenting to or calling the emergency shelter directly. Individuals do not have to contact the Allegheny Link to obtain referrals for emergency shelters. Individuals who do contact the Allegheny Link will be given information about the emergency shelter locations and intake times and will be assisted in developing a plan and strategy to access the shelter program of

their choosing. CE also manages access to a smaller subset of shelter options for single adults that operate under an “invite-only” access model. Individuals are identified for these spaces in partnership with the Street Outreach community of providers and are geared toward those who might otherwise be insufficiently served by a traditional shelter setting. CE is responsible for sending out a daily email to a distribution list of CoC homeless providers and a broad range of community partners listing out important resource updates, learning opportunities, and the daily reported vacancies from each of the single emergency shelter providers funded by the CoC.

For individuals who have enrolled in one of the CoC individual serving emergency shelters it is expected that the shelter staff work to connect the individual to CE, either by phone or in person at the Allegheny Link or to the OCS Field Unit who spend time in the community, at engagement centers, and the shelters to complete an assessment with Coordinated Entry.

CE ensures there is robust communication with those within the CoC and the larger provider community around the vacancies available within the single serving emergency shelter system. This involves daily shelter vacancy updates (Monday through Friday) that includes details on how to contact & access the shelter, upcoming trainings, and resource update information.

Accessing Emergency Shelter for Families with Minor Children

Access to family shelters within the CoC is managed by CE through the Allegheny Link. Families with minor children are asked to call the Allegheny Link if they do not have a safe place to stay that evening. Families are then placed in a unit that matches the household makeup, as capacity is available.

During times that the Allegheny Link is not operational, there is a triage system that directs callers to a variety of options based on their situation. All the programs listed can assist people during off-hours as space is available, independently from the operational hours of Allegheny Link. As households present to single shelter during times outside of the normal hours of operation of the Allegheny Link, shelters can serve the households, as capacity allows, and connect the households to the Allegheny Link for further assessment and screening. Families that call in during this time are triaged to an after-hours answer service that will discuss further options for diversion and connect to one of our family shelters for a potential temporary stay in an overflow space until traditional shelter space is available.

For families with minor children who have enrolled in one of the CoC Family Emergency shelters they are given a period of 10 days to become stable in shelter, self-resolve their

housing crisis, meet with shelter staff & the Homeless Services & Supports Coordinator (HSSC) prior to completing an assessment with Coordinated Entry. After the 10th day in emergency shelter CE staff outreach to the family to complete the assessment.

Shelter Hold Process for Emergency Shelters

For individuals without children utilizing the emergency shelter system, a “bed” or vacancy can be held for 1 night, without notice or the individual returning to the shelter. If the individual does not contact or return to the shelter after that 1 night – the vacancy will not be held and will be made available for another individual in need to utilize.

For households with minor children utilizing the family emergency shelter, a unit can be held for 2 nights, without notice or the family returning to the shelter.

Units/beds can be held for up to 3 nights for individuals and 5 nights for families with an excused absence. Any absence lasting longer than those days listed above must be approved by Coordinated Entry.

For families with children: Remy Harris remy.harris@alleghenycounty.us

For individuals/singles: Andrea Bustos andrea.bustos@alleghenycounty.us

Homeless Prevention (HP) and Rental Assistance (RA)

Coordinated Entry is the entry point for new move rental assistance within the CoC. This RA is available through Homeless Assistance Program (HAP) and other block grant funding sources to assist households as they exit homelessness into stable housing.

The CoC also has a robust prevention collaborative available through ACTION Housing and the Allegheny Housing Stabilization Collaborative (AHSC). The purpose of the AHSC is to provide financial assistance to those at highest risk of eviction to stabilize their housing situation. HP access points (AHSC, Housing Stabilization Center, Allegheny Link, etc.) have the ability to coordinate information and referrals back and forth to ensure persons at imminent risk of literal homelessness are provided coordinated access to the CoC HP services regardless of where the participant first contacts the CoC.

Allegheny County Coordinated Entry Policies & Procedures

For both new moves and eviction prevention assistance assessment and referrals to other supportive services in the community are also offered to maximize stability after financial assistance has been received. It is a combination of 5 different funding sources, each with distinct eligibility requirements and documentation standards.

Marketing

The implementation of Coordinated Entry through a central phone number and drop-in centers has greatly improved equal access to the homeless system. The phone number is toll-free and is operated and staffed 8am-5pm. During off-hours and weekends, a messaging service prompts callers to designated emergency housing services that have specialized protocols for those times. The CE drop-in center is in downtown Pittsburgh and is accessible by numerous bus routes. The path of access to the building and the building itself is fully ADA accessible. For those individuals and families who are unable or unwilling to access CE by presenting in person or by phone, CE utilizes the OCS Field Unit who go into the streets, shelters, and warming/drop-in centers to assist people where they are most comfortable. Additionally, the Specific steps to market the CE system include, but are not limited to:

- CE staff attend meetings and community events to explain and market access to the homeless system. These engagements include the Peoples Universal Service Advisory Group, Allegheny County Local Housing Options Team (LHOT), Allegheny County Disability Task Force, and other meetings that serve people with disabilities, racial and sexual minorities, and other protected classes.
- Materials and resources are posted at the local libraries and County Assistance Offices (SNAP, Medicaid and TANF enrollment sites), and many other service locations within the community.
- The Allegheny Link also has a prominent presence on the websites of both the Allegheny County Department of Human Services and the Homeless Advisory Board (HAB). CE policies and resources are posted on this website.
- Regular email updates to the general community, service providers, and City & County departments will be shared as needed.
- Educating mainstream service providers about how to connect households to CE.

Equal Access

The Allegheny County CoC, the CES, and providers do not discriminate against any individual or household, regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity or marital status. All people, regardless of their inclusion in different populations and subpopulations, including people experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence (DV), have fair and equal access to the coordinated entry process. These policies are monitored through the referral and denial process, as noted below.

All CoC providers must have non-discrimination policies in place and assertively outreach to people least likely to engage in the homeless system. All CoC providers must comply with all federal statutes including the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of Civil Rights Act and Title II and III of the Americans with Disabilities Act (ADA).

Accessibility

Allegheny Link and OCS Field Unit utilize language translation services (including ASL) that are “on demand” for people attempting to access Coordinated Entry for whom English is not the primary or preferred language.

Safety Planning for Those Fleeing Domestic Violence/Intimate Partner Violence (DV/IPV), and Other Safety Issues (Stalking, Trafficking, etc.).

Collaborating with the CoC’s VAWA-funded agencies, DV/IPV trainings are provided to CE staff on a rolling basis, including training on identification, intervention, referrals, and safety issues. Additionally, the coordinated entry staff receive trauma informed care and mental health first aid trainings.

The CE access points conducts an initial screening of risk or potential harm as a result of domestic violence, sexual assault, stalking, or dating violence. In the event defined risk is deemed to be present, the individual will review if a safety plan is in place; if not, immediate safety issues are discussed, and the client is directly connected to a domestic violence provider who specializes in services and housing assistance, using a trauma-informed approach designed to address the service needs of survivors of abuse, neglect, and violence. CE staff also ensure that the client can share information safely during the contact and are transparent about information collection and storage.

The CoC includes 3 local domestic violence hotlines and providers, which has coverage available 24 hours a day, seven days a week, to ensure that all persons who are fleeing or attempting to flee domestic violence or sexual assault have immediate access to crisis

responses services. All persons will have access to these hotlines regardless of which access point they initially contact for services and assistance through the CoC's CE.

Violence Against Women Act (VAWA)

All households seeking CoC assistance via a HUD or ESG-funded unit shall be notified of their rights under VAWA at the time of application for and termination of assistance via [HUD Form 5380 completed by the Housing Program and attaching HUD Forms 5382 & 5383.](#)

The VAWA regulatory requirements under 24 CFR part 5, subpart L, as supplemented by this section, apply to all eligibility and termination decisions that are made with respect to all HUD and ESG-funded units. Program participants may not be denied admission or assistance, terminated from participation, or be evicted from housing on the basis or as a direct result of the fact that they are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, if they would otherwise qualify for the program.

A participant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, as outlined in the Allegheny County CoC VAWA Emergency Transfer Plan, if the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

[INSERT LINK TO ALLEGHENY COUNTY CoC EMERGENCY TRANSFER PLAN]

Privacy & Nondiscrimination Complaint Process

The Allegheny Link and the OCS Field Unit obtain consent to share information for purposes of assessing and referring households through the CE process. Clients decide what information they provide during the assessment process without retribution or limited access to assistance. Services will not be denied if the client refuses to provide certain pieces of information, unless the information is necessary to establish or document program eligibility per the applicable program regulation, or Federal statute requires collection, use, storage, and reporting of personally identifying information as a condition of program participation. Households are not asked or required to disclose specific disabilities or diagnosis, and an individual may refuse to disclose any information, however based on program criteria, e.g., a long-term disability is required for permanent supportive housing, refusing disclosure of certain information may limit the options for services that they are eligible for.

Allegheny County Coordinated Entry Policies & Procedures

CE is committed to ensuring that no information is used to discriminate or prioritize households for housing and services on a protected basis such as race, color, religion, national origin, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, or marital status.

Those participating in CE are informed of the ability to file a complaint through the grievance process, which includes contacting the Director's Action Line (DAL). The DAL resides within DHS' Office of Equity and Engagement (OEE) and provides those served by DHS, and the CoC, easy access to a specialist who resolve concerns, misunderstandings, and complaints regarding services provided through DHS.

ASSESSMENT

Standardized Access and Assessment Tool

Diversion & Resource Navigation of CE

When any household contacts the Allegheny Link or OCS Field Unit, further known as CE service coordinators, and indicates they are experiencing a housing crisis, staff first complete an initial screening for services. To prevent and divert people from entering the homeless system, skilled CE service coordinators will do a thorough review of all public benefit programs for which an individual may qualify. These programs include, but are not limited to:

- Housing Resources (Affordable, Subsidized, Accessible, etc.)
- Food Assistance (Food Pantries, SNAP Benefits, Produce to People)
- Utility Assistance (Universal Services, Dollar Energy, LIHEAP, LIWAP)
- Health Insurance (Medical Assistance, Medicare Savings Programs, Rx Programs)
- Transportation Programs (Medical Assistance Transportation Program, ACCESS)
- Employment/Income Assistance (CareerLink, Office of Vocational Rehabilitation, SOAR, TANF)
- Behavioral Health Services (Mental Health & Drug and Alcohol Services)
- Documentation Replacement Services (Birth Certificates, SS Card, Photo ID)
- Tangible Goods (Furniture, Clothing, Baby Supplies, Appliances, etc.)
- Home and Community Based Waiver Programs and Other In Home Services
- Home Visiting Programs for Caregivers (Pregnant or Have Young Children (0-6) (Maternal Child Health Programs, Early Head Start/Head Start, or Family Centers)

Allegheny Housing Assessment (AHA) and Eligibility Screening Questions (ESQ) (as of August 28, 2020)

The Allegheny Housing Assessment (AHA) is a decision support tool that helps the Allegheny County Department of Human Services (DHS) prioritize admissions to housing services (i.e., bridge housing, supportive housing, and rapid rehousing) for individuals or families experiencing homelessness. The tool utilizes administrative data from Allegheny County's Data Warehouse to predict the likelihood of three types of adverse events occurring in a

person's life if they remain unhoused over the next 12 months: a mental health inpatient stay, a jail booking and/ or frequent use (four or more visits) of hospital emergency rooms. These events serve as indicators of harm and are things we would like to prevent. AHA assigns a risk score that is used as part of the housing prioritization process. In addition to prioritizing scarce housing resources, AHA will help Allegheny County to document unmet housing need created by the gap between limited housing resources and the number of high-risk eligible people to fill those resources.

For those households that do not have sufficient administrative data to generate an AHA score, there is an Alternative AHA assessment that is completed. This assessment is a self-report assessment tool that includes questions that were determined to be predictive of most of the outcomes of the AHA.

[For more information on specifics relating to the AHA please navigate to the Allegheny Housing Assessment webpage.](#)

This webpage includes:

- AHA Methodology
- AHA Tool FAQs
- Summary of feedback on the new housing prioritization process
- Independent ethical/data science review of AHA
- DHS's response to the ethical review

Coordinated Entry Assessment Process

For households who do not have a safe place to stay that evening and/or are fleeing domestic violence, the following standardized assessment tool is used, and process is followed:

- Households meets the CoC definition of homelessness (literally homeless or fleeing domestic violence)
- Household is offered to complete the Allegheny Housing Assessment (AHA) and Eligibility Screening Questions (ESQ) to screen for eligibility for homeless housing program wait lists.
- Households must complete all questions on the assessment to determine eligibility and appropriate waitlist placement
 - Eligibility Screening Questions + any additional AHA questions that are incorporated into one comprehensive assessment

Allegheny County Coordinated Entry Policies & Procedures

- If eligible, the individual is placed on the homeless housing program waitlist and the next step in the process is for the household to connect to CE monthly to maintain their eligible status on the waitlist.

For households who are not being evicted, experiencing homelessness, or fleeing domestic violence, or who receive a score that does not qualify them for a homeless housing program, but are without stable housing the following Housing Resource Action Planning (HRAP) process is followed:

- Basic demographic information is collected. *
 - Questions relating to focusing/targeting of housing resources are included.
- They are provided subsidized housing options (Housing Authorities) and affordable housing search resources.
 - Basic review of differences between subsidized and affordable housing
 - Explain housing search options (PA Housing Search, HUD.gov, Newspapers, Craig's List)
 - If the household does not have access to the internet public libraries are suggested and client is informed that PA Housing Search has a toll free # 1-877-428-8844. They can also pick up any listings at the Allegheny Link office.
- If interested, an Allegheny Link Affordable Housing Resource Packet ([Allegheny Link Affordable Housing Packet – NEEDS UPDATED](#)) can be mailed, emailed, or picked up at office.
 - This packet is a “starter kit” for households beginning a housing search. It includes detailed housing authority information, guidance on how to search for affordable housing, rental tracking sheet, potential documentation requirements, potential landlord questions, legal assistance for housing issues, where to find furniture or household items, general financial assistance agencies, and utility company information.

This housing search assistance through HRAP is also provided those who are eligible for homeless housing programs but is offered as the eligible service to those ineligible to be placed on the waitlist.

For households who are in the process of being evicted for rental arrears, the following process is followed:

- Household completes a more limited prevention & eligibility assessment
- Household must be at the crisis point of magistrate notice to qualify for eviction

prevention funding referrals, while also being targeted for community resources

- Household is targeted to one prevention program path specific to their situation to more efficiently alleviate their issue

Additionally:

- All households are encouraged to be as open and honest as possible to get the most accurate assessment of their crises
 - Throughout the assessment process, participants must not be pressured or forced to provide CE staff with information that they do not wish to disclose, including specific disability or medical diagnosis information.
- It is crucial that households served by CE have autonomy to identify whether or not they are uncomfortable or unable to answer any questions during the assessment process, or to refuse a referral that has been made. In both instances, the refusal of the household to respond to assessment question or accept a referral shall not adversely affect their position on the CE prioritization list.
 - Note that some funders, such as HUD, require collection and documentation of a disability or other characteristics or attributes as a condition in determining eligibility. Individuals who choose not to provide information in these instances could be limiting potential referral options.
- All households are read a disclaimer relating to the sharing of their information as a program that receives their referral will have access to their complete assessment to better coordinate services.
- All households assessed for homeless services are provided the opportunity to receive a connection request to a Street Outreach team within the CoC via the Field Unit .

* The CE assessment process may collect and document individuals' membership in Civil Rights protected classes but will not consider membership in a protected class as justification for restricting, limiting, or steering participants to particular referral options.

PRIORITIZATION

The Allegheny County Continuum of Care (PA-600) is committed to ensuring that eligible individuals and families experiencing homelessness have fair and equal access to services for which they are eligible. The Continuum of Care (CoC) does not discriminate against any individual or family experiencing homelessness based on race, gender, age, ancestry, religion, ethnicity, sexual orientation, gender identity, disability, familial status, or any other protected class currently listed in federal, state, or local ordinances in the provision of services within the CoC.

At this time, the Allegheny County CoC only makes referrals to housing programs within the Continuum of Care for any individual or family experience literal homelessness (unsheltered, in an emergency shelter, safe haven, or place not meant for human habitation), is facing the immediate (today or tonight) loss of their current housing or is coming from transitional housing as described below.

The Allegheny County CoC has adopted [CPD-16-11, HUD's Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#), as well as CPF-17-01, HUD's Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System. Further, the CoC has expanded the prioritization practices to the Rapid Rehousing, Bridge and Transitional Housing programs. Therefore, households designated as Chronically Homeless are prioritized throughout the entire system. As such, the waiting list for housing programs within the CoC follows the prioritization outlined below, which incorporates the Orders of Priority in HUD Notice CPD-16-11.

Utilizing the process described above, Coordinated Entry, then prioritizes households experiencing homelessness within the CoC's geographic area for referral to housing and services. Priorities are consistent with CoC and ESG written standards approved by the Homeless Advisory Board (HAB). Households are prioritized by AHA score, HUD CH status, and time of placement on waitlist. All referrals to ESG and CoC funded programs flow through Coordinated Entry. There is a prioritized by-name list called the "Homeless Housing Program Wait List" that is kept within CE.

MATCHING & REFERRALS

Vacancy Management Process

Coordinated Entry process

- When a provider has a vacancy in a program, they will contact one of the Homeless Resource Coordinators (HRC) via HMIS to request a referral.
- Once the HRC receives the request for a referral, the HRC will begin working down the prioritized list of eligible households. Each household will have a minimum of 3 attempts by each contact method. The HRC will at least attempt this contact through 3 business days.
 - The HRC works closely with the CoC street outreach providers and other community stakeholders to help in the connection.
- If the Household accepts the program offer, the HRC assigns the household in HMIS and notifies the program provider, street outreach, and other CoC supports of the new referral and how to contact via email.
 - There are detailed referral notes included in the electronic HMIS referral that can be referenced throughout the engagement process. These notes include specifics around the individual's CH timeline, engagement strategies, documentation concerns, etc.

Engagement expectations of provider*

- When the referral is received, the provider must begin reaching out within 1 business day to begin the intake process with the Household.
- Family shelters must attempt contact a minimum of 3 times in 24 hours. All other programs must attempt contact a minimum of 3 times in 3 business days.
- Programs must try all contact phone numbers listed in the referral and email the household if an email address is listed in the referral. Every contact attempt must be documented with the date, time, and outcome.
 - Thus, if there are 3 phone numbers listed for the household, each number must be contacted 3 times (a total of 9 phone calls).
 - If the households cannot be reached by phone or email a reply back to the HRC referral email, that includes any shelter or street outreach providers, should occur in order to ask for support in engaging with the household.

- Providers are also welcome to attend the weekly street outreach case conferencing meeting to bring engagement needs directly to those supporting those who are unsheltered.
- As soon as the Household verbally confirms interest in the program to the provider, the provider should change the referral status from Assigned to Accepted Pending within HMIS.

***The Homeless Resource Coordinators work with emergency shelters, street outreach programs, OCS Field Unit, warming centers, drop-in/engagement centers, and many other service providers within the community to assist in locating clients. If a program is having difficulty connecting to a Household, they should immediately reach out to CE for additional engagement strategy options.**

Clients' rights to decline a referral

Clients have the right to decline a referral and specific programs based on their needs and preferences. A Client declining a referral will not remove them from their other waiting lists if they remain eligible for those services. At the time of initial assessment, the CE informs clients that they cannot guarantee a timeline as to when a vacancy may become available. As part of a Crisis Response system, clients are encouraged to work with first availability to quickly resolve their housing crisis unless there are imminent safety concerns. As part of the referral to a program, the HRC informs the clients that they cannot guarantee a timeline as to when another vacancy may become available, if they were to decline it.

Provider expectations for document collection for eligibility

- During the regular intake and enrollment process, a provider must verify proof of homelessness documentation.
- Once a participant is enrolled, the program has up to 45 days to collect all remaining documentation. The only exception is documentation of Chronic Homeless (CH) status. Participants can have up to 180 days for verification of their chronic homeless timeline only. See: <https://www.hudexchange.info/resource/5182/sample-chronic-homelessness-documentation-checklist/> & <https://www.hudexchange.info/news/new-resources-on-documentation-of-chronic-homelessness/>
- If documentation cannot be produced within 45 days of enrollment, then the client may be removed from the program.

Documents needed to verify specific sub-populations

DHS requires that clients identified as part of certain sub-populations have the required documentation to receive this priority. These sub-populations and circumstances include:

- *Chronic homeless status*: Clients will need disability verification as well as third party documentation of homeless status continuously for 12 months (1 year) or 4 episodes of homelessness in the last three years that amount to at least 1 year of homelessness. Clients have the ability to self-certify 3 months of homelessness in their CH timeline. Programs must document according to the Recordkeeping Requirements established in HUD's Notice CPD-16-11, with third party verification preferred.
- *Transition Age Youth*: Single clients who are ages 18 to 24 with no minor children or other household members and households of all adults within ages 18-24 range with minor children and no other household members.
- *Domestic Violence/Intimate Partner Violence*: Clients who are actively fleeing domestic violence can self-certify upon entrance into the program.
- *Veteran status*: Clients will need to provide proof of military service and documentation of their military discharge status upon entrance into the program.

Referral Denials

If a program has completed the necessary steps to determine client eligibility (for example, contacting client, scheduling appointment, conducting interview, verifying required documentation) and the client is ineligible for any reason, their status on the bulletin board should be changed to "denied-pending" with a reason from the dropdown.

All denials will be reviewed by Coordinated Entry (CE) staff. This denial will be sent to the CE staff who will review the denial within 1 business day and have 3 business days to provide a decision or advise on next steps to the program.

In all program types, except Emergency Shelters, Rental Assistance and Prevention programs, the vacant unit will electronically be held for the client until the denial is accepted by Coordinated Entry or the client has been enrolled. If this is the only vacancy in the program, the program will not be able to request any subsequent referrals until a decision is made by Coordinated Entry regarding the denial. If there are multiple vacancies, the program will be able to continue to work with the next assigned client(s) while the denied client's status is reviewed.

Reasons in HMIS for a program to deny a referral:

- HMIS user error
- Inability to complete intake
- Does not meet eligibility criteria
- No longer interested in this program
- No longer experiencing homelessness
- Estimated vacancy no longer available
- Enrolled, but declined HMIS data entry

If Coordinated Entry staff approves a denial

CE staff will review current program enrollment and recent contact with the Allegheny Link and other homeless service providers to determine if further follow up with the household is needed. Depending on the household's situation, CE staff will reach out to households to determine if they are still in need of homeless services. CE staff then either removes or maintains the household's other referrals. If a potential reassessment is needed CE staff will coordinate.

If Coordinated Entry staff rejects a denial

The referral status will change back to "Assigned" on the program's bulletin board and the program should continue to work with the household to reduce barriers to program enrollment. CE staff will communicate with the program on next steps.

If the program disagrees with Coordinated Entry's final denial decision

The program has the right to appeal the decision. The following steps outline the procedure for appealing Coordinated Entry denial rejections:

1. Programs that disagree with CE staff's decision to reject a denial must submit a request for appeal. Initially, it can be submitted electronically via email and then followed up with a letter on formal provider letterhead in the mail. The appeal request must include the following:
 - a. Name and Referral ID of the applicant.
 - b. Short summary of the denial process to date including date of original denial and CE decision; and
 - c. Short explanation of the reasons the program believes the CE decision to reject the denial should be overturned.

All appeals should be submitted to the DHS Homeless Program Appeal Panel (hereafter referred to as the “panel”) by emailing Andrea Bustos, Administrator Resource Navigation and Community Supports, Office of Community Services (OCS) at Andrea.Bustos@AlleghenyCounty.US within 1 business day from the time of CE rejection of denial, and then followed by a letter to:

Allegheny County Department of Human Services

DHS Homeless Program Appeal Panel

Attn: Andrea Bustos, Administrator (OCS)

One Smithfield Street, Pittsburgh, PA 15222

2. The DHS Homelessness Appeal Panel consists of the Department of Human Services leadership. After an appeal is requested, the panel will convene a meeting with the program staff who made the appeal (and others they choose to invite) and the CE staff who were involved in the initial denial decision. The meeting must be scheduled within 7 business days from the appeal.
3. At the appeal meeting, the program and the CE staff will each have an opportunity to present their reasons for denial/rejection of denial. The panel will also ask questions. If consensus on a decision can be reached at this meeting, the process may end at this step and the decision of the group will be documented in writing by the panel and sent to all parties involved.
4. If consensus cannot be reached during the appeal review meeting, the panel will have 72 hours to make a final decision. This decision will be documented in writing and submitted to all parties involved.
5. If the program does not agree with the final decision made by the panel, the program may file an administrative appeal through the Court of Common Pleas.

EXIT STRATEGY PROPOSAL (ESP)

Housing providers within the CoC may request that a household be reviewed for a higher level or different housing intervention.

The process was developed to request for:

- Progressive Engagement*: Transitional Housing/Rapid Rehousing to Permanent Supportive Housing
- Program Transfer: Permanent Supportive Housing to Permanent Supportive Housing

*Currently, the process has been primarily used for Progressive Engagement.

The ESP should only be submitted when all other potential options have been exhausted and a successful exit to stable housing is not viable without the higher level of housing support.

If all avenues have been exhausted and a successful exit plan is not viable without a higher level of housing support – whether that be the need of an ongoing subsidy or ongoing support – providers are asked to complete the ESP form.

The ESP Form is a Microsoft Form and thus does not have a “Save” feature. Ahead of completing an ESP, providers can reference the ESP Desk Guide that can assist in ensuring all information is gathered to complete the ESP in its entirety. This document is not intended to be completed as a paper application. All ESPs need to be completed via the Microsoft Form link above. Once an ESP is submitted the program will receive a confirmation via email of the ESP.

Once the ESP is received, it is reviewed by an internal team that will then respond via email to the provider with the outcome and/or next steps. Potential next steps can include initiating a move towards PSH or facilitating a case conference with the provider team for more case specific conversation and collaboration. The move towards PSH is dependent on the capacity in the system and eligibility of the household, so it is never a guarantee that an ESP for PSH will be approved.

ESP reviews are held bi-weekly and led by the Coordinated Entry Manager.

DATA MANAGEMENT

The Allegheny County CoC Allegheny Link (CE) Application & HMIS are administered by the Allegheny County Department of Human Services.

Before completing an AHA and submitting for placement on the Homeless Housing Program Waiting List all staff must obtain a verbal consent to share and store client information for the purposes of assessing and referring them through the Coordinated Entry system to a homeless housing provider.

The CoC will not deny services to any client based on that client's refusal to allow their data to be stored or shared.

Further information on data monitoring and HMIS can be found in the [Allegheny County HMIS Policies and Procedures Manual](#) and the [Allegheny County OCS Homeless & Housing Contract Specification Manual Overview](#).

Allegheny County Homeless Continuum of Care: Additional Considerations for Eligibility

These programs below are treated as literally homeless for assessment purposes based on being an emergency shelter (non-CoC funded) or following emergency shelter eligibility:

- Bethlehem Haven Medical Respite
- UPMC/CHS Medical Respite at Wood Street Commons
- Community Human Services Adult Probation Program at Wood Street Commons
- Community Human Services Safe Haven I&Q Space
- DHS Contracted Recovery Housing
 - East End Cooperative Ministry
 - Heuer House
 - Za'Kiyah House (Braddock)
- Family Promise Emergency Shelter
- Genesis of Pittsburgh
- Light of Life Family Emergency Shelter
- Pittsburgh Mercy Central Recovery Center (CRC)
- Proud Haven's Haven House
- resolve

The following programs follow the institutionalization rule*:

- Inpatient hospitalization
- Chartiers Center Diversion and Acute Stabilization (DAS)
- Pittsburgh Mercy DAS
- Turtle Creek Valley Community Services DAS
- Wesley Family Services DAS

**If experiencing homelessness prior to entry, will be there less than 90 days, and is expected to continue experiencing homelessness upon discharge. If not experiencing homelessness prior to entry, eligibility is day before discharge with no safe place to go.*

HUD Sources

Coordinated Entry (CE) Notice:

HUD Sources Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System. Notice CPD-17-01. January 23, 2017.

<https://www.hudexchange.info/resource/5208/notice-establishing-additionalrequirements-for-a-continuum-of-care-centralized-or-coordinated-assessmentsystem/>

COC Program Interim Rule:

Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program Interim Final Rule, 24 CFR Part 578. July 31, 2012.

https://www.hudexchange.info/resources/documents/CoCProgramInterimRule_FormattedVersion.pdf

Final Rule defining chronically homeless:

Homeless Emergency Assistance and Rapid Transition to Housing: Defining “Chronically Homeless,” 24 CFR Parts 91 and 578. December 4, 2015.

<https://www.hudexchange.info/resources/documents/Defining-ChronicallyHomeless-Final-Rule.pdf>

Prioritization Notice (addressing Permanent Supportive Housing):

Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing (CPD-16-11). July 25, 2016.

<https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizingpersons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-personsin-psh.pdf>