



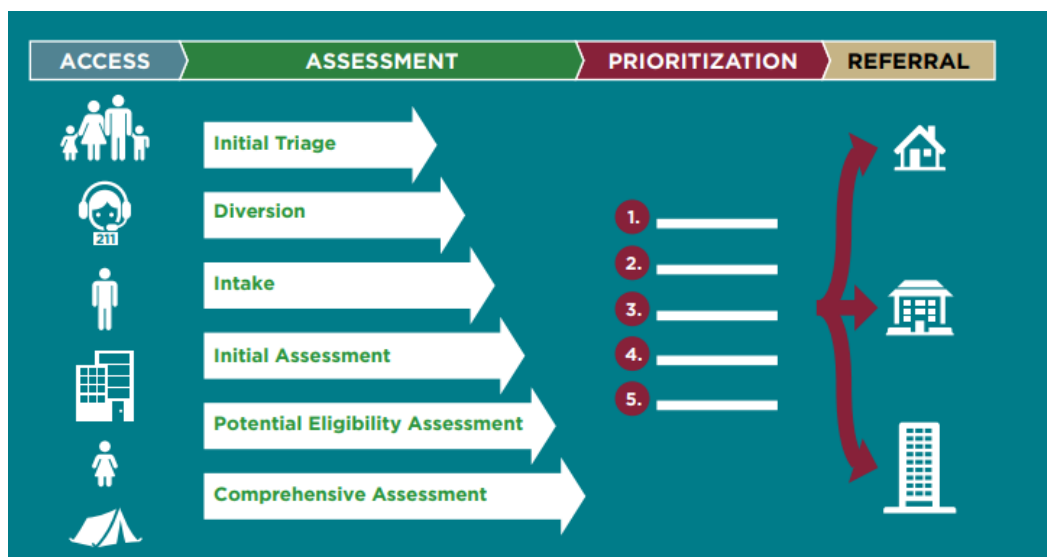
# Coordinated Entry and Balance of State Continuums of Care

*March 18, 2024*



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## Coordinated Entry Basics



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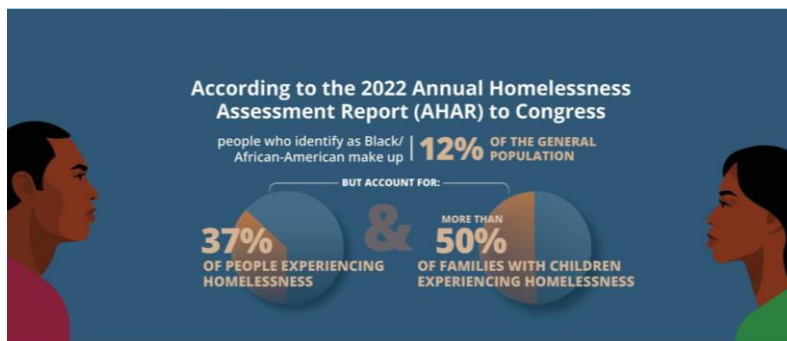
- A CoC must establish fair and equal access to its CE process for everyone within its geographic area.
- BoS CoCs need to consider how prospective participants can easily access the system from anywhere within the CoC.
- Recognizing the prevalence of racial and other social inequities that persist nationwide in homelessness response systems, HUD asks CoCs and agencies that operate federally funded programs to identify what causes inequities and identify strategies to address those inequities.



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## CE, Racial Equity, and Fair Housing

- Discriminatory housing policies and practices have systemically marginalized people of color, individuals with disabilities, families with children, and other populations.
- Race discrimination in housing continues to be a persistent driver of inequity contributing to disproportionately high rates of Black, Brown, Indigenous, and Native Hawaiian/Pacific Islander individuals experiencing homelessness.



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# Coordinated Entry as Tool for Equity

Resources and assistance to support HUD's community partners

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Self Paced Online Training HUD SPONSORED

## Coordinated Entry as a Tool for Equity: Training on Fair Housing and Coordinated Entry

This in-depth, self-paced training aims to:

- Explain the importance and applicability of federal fair housing and civil rights laws to the Coordinated Entry (CE) process
- Provide an introductory review of the key concepts and context for CE
- Identify best practices to address inequities based on race, disability, and other protected characteristics within the Continuum of Care (CoC) CE process while complying with fair housing and civil rights laws

It is recommended, but not required, to complete the training in order. Users are able to go through sections individually and return as often as needed. There is no certificate upon completion.

This training was developed by HUD technical assistance (TA) providers with extensive input from the TA Racial Equity Team, TA People with Lived Experience Team, Office of Special Needs Assistance Programs (SNAPS), and other HUD partners.

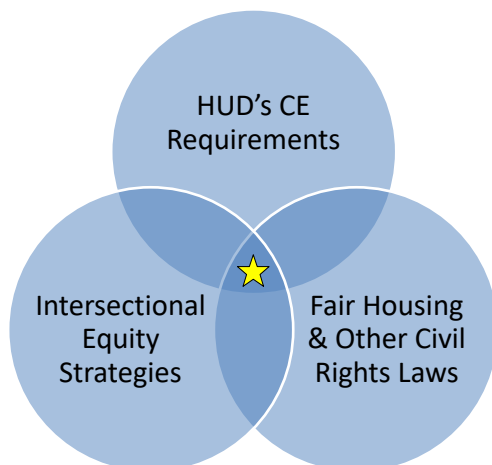
**Sponsored By:**  
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## Fair Housing & CE Training Purpose



- Pain point in communities:** Not all equity strategies comply with HUD's CE requirements + fair housing laws.
  - Example: CoCs cannot use racial identity as a CE prioritization criterion.
- This training (★) sits at the nexus of that tension. It is one of many tools to support communities in both embedding equity and complying with federal requirements and laws



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## Fair Housing Laws and Executive Orders

- **Fair Housing Act** prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status;
- **Title IV of the Civil Rights Act** prohibits discrimination on the basis of race, color or national origin under any program or activity receiving Federal financial assistance;
- Section 504 of the **Rehabilitation Act of 1973**
- **The Age Discrimination Act**
- **HUD's Equal Access Rule** prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status
- **The Violence Against Women Act**



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## Protected Classes

The laws and executive orders described on the prior slide prohibit discrimination against households and individuals based on the specified **protected classes**:

- Race
- Color
- National origin
- Religion
- Sex (including sexual orientation and gender identity)
- Familial status (presence of children under 18 in the household, including pregnancy and seeking legal custody)
- Disability
- Age
- Survivors of domestic violence, dating violence, sexual assault, and/or stalking



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## CE: Access

**CoCs must connect people to the CE system in a standardized and equitable manner.**

- Affirmative marketing
- Geographic dispersion
- Readily available & accessible entry points
- Subpopulation-specific access points



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## CE: Access

**Affirmative marketing** plans should:

- Assess which eligible groups are least likely to access the system and why
- Identify a special outreach plan that includes clear and accessible communication and coordination methods.
- Take appropriate steps to effectively communicate with individuals with disabilities and limited English proficiency.



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## CE: Assessment

Per Notice CPD 17-01 (the CE Notice), CoCs may have different access points and assessment tools/processes for five subpopulations:

- Adults without children
- Adults accompanied by children
- Unaccompanied youth
- Households fleeing violence
- Persons at risk of homelessness



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## Designing CE Assessment Tools

- Review data to determine how race and ethnicity affect access to homeless services in your community.
- Develop an assessment tool that captures differences in vulnerability and barriers to housing for people of different racial and ethnic backgrounds.
- Collaborate with people from different racial and ethnic groups, with lived experience of homelessness and housing instability.



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## CE: Assessment and Prioritization

- While CoCs cannot prioritize households based on legally protected characteristics, they can adopt approaches that address inequities in the homelessness response system.
- To promote equity, the CE process may collect information during the assessment process to identify higher-vulnerability households and support the prioritization process in a manner that advances equity by removing barriers, without violating federal fair housing or civil rights law.
- CoCs can ask for information such as criminal or legal history, eviction history, involvement with the child welfare system, or other barriers households have faced, to identify higher-vulnerability households and design a more equitable system.



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## CE Assessment Question

- Communities have developed new equitable assessment tools in partnership with people with lived experience with amazing results.
- So, as not to create a fair housing violation, communities should not assign points solely based on someone being part of a racial group or due to their sexual or gender identity.
- Below is an example of an assessment question that meets fair housing law which can be utilized to assess the vulnerability of unlawful discrimination and cooccurring traumas:

***Do you believe you have experienced discrimination, for example, in housing, employment, education, healthcare, the criminal legal system, financial services, or social services?***



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## CE: Prioritization

The prioritization process:

- Is separate from assessment and must be based on specific criteria made publicly available through the CoC's written standards.
- Must be applied consistently.
- Should be based on need, vulnerability, and barriers.
- Decisions should be grounded in quantitative and qualitative evidence.



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## CE Prioritization Dos and Don'ts

### Do

- Use data to inform the prioritization process
- Define and record a specified set of prioritization standards to apply consistently throughout the CoC
- Consider multiple criteria in determining a participant's level of priority
- Maintain a priority list

### Don't

- Exclusively use the standardized assessment to determine priority level
- Disconnect the assessment tool from the prioritization tools



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## CE: Referral

### Eligibility determination

- Participants cannot be required to reveal protected characteristics.
- CE staff may ask **all** participants questions about protected characteristics to determine eligibility for programs with legally permitted eligibility criteria.
- Participants should be provided with all available options for which they are eligible (avoid “steering”)
- For BoS CEs, consistent documentation requirements across regions and programs will expedite placements



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## Equity in Coordinated Entry

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Put the **whole person** first. Consider all dimensions of a participant’s identity and lived experience, and not their protected characteristics.

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**Increase access** for all people by ensuring advertising, education, and assessment materials are **inclusive**. Ensure that materials are available in languages of community members with limited English proficiency.

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**Analyze the inequities** that exist in the system and use CE as a tool for advancing equitable access to, experiences within, and outcomes after leaving the system.



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## BALANCE OF STATE CE SPECIFIC Q AND A'S

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## Referral Requirements

**Q. Do CoC-funded projects have to take referrals from the entire CoC, unless there is an approved geographic restriction in their grant agreement with HUD?**

**A. YES,** CoC projects are required to participate in the CoC's coordinated entry (CE). All housing referrals for CoC and ESG-funded projects (TH, RRH, HP, and PSH) must go through the CoC's coordinated entry (CE) process as required in HUD's 2017 CE Notice) and based on the policies documented in the CoC's CE policies and procedures and CoC and ESG written standards. If the CE system serves the full CoC geography, CoC-funded projects must take referrals from throughout the CoC.



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## Subregional CE Referral Zones

- The CE Notice **does allow CoCs to establish sub-regional referral zones** within the CoC's full geography.
- Zones enable large CoCs to facilitate participant referrals to available resources and **avoid forcing participants to travel or move** long distances to be assessed or served.
- Decision to use must be made and **approved by the CoC**, not by a single project or subregion of the CoC.
- This is **only an option where there are housing and service resources** available within each referral zone.



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## Multiple Prioritization Implementations

**Q. Can a CoC have multiple CE prioritization implementations (one using prioritization policies informed by COVID-19 and one not) across regions within a BoS CoC?**

- A. It is up to your CoC to make this decision.** A single project or region of your CoC cannot decide without CoC collaboration and approval.
- How each CE implementation within the CoC determines its prioritization process must be standardized and documented in your CoC's written CE policies and procedures.
  - Your CoC could choose to allow different CE regions to implement different prioritization policies and procedures based on unique needs and circumstances.



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## Geographic Restrictions

### Q. Can CoC-funded projects request a geographic restriction?

#### A. **NO** CoC-funded projects may not request a geographic restriction.

- HUD understands that it may be difficult for agencies in communities where the CoC covers a large geographic area to provide services throughout the entire CoC.
- It is important for the CE system to maintain awareness of and links to resources outside CoC-funded projects to refer participants.
- While agencies are expected to take referrals throughout the CoC, agencies are not expected to provide services outside a reasonable area from where the agency is based.



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## Resources

### Coordinated Entry Guidance:

- [Notice CPD-17-01: Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System - HUD Exchange](#)
- [Coordinated Entry Core Elements - HUD Exchange](#)
- [Coordinated Entry Self-Assessment - HUD Exchange](#)
- [Coordinated Entry Management and Data Guide - HUD Exchange](#)
- [Coordinated Entry Community Samples Catalogue - HUD Exchange](#)

### Coordinated Entry & Fair Housing:

- [Coordinated Entry as a Tool for Equity: Training on Fair Housing and Coordinated Entry - HUD Exchange](#)
- [Fair Housing and Related Law | HUD.gov](#)



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Thank you!

*Feel free to reach out with any  
CE related questions!*

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Office of Special Needs Assistance Programs  
Department of Housing and Urban Development

