Texas Balance of State Continuum of Care

Regional Coordinated Entry Policies and Procedures for

Comal County CEPE

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# Purpose

This document outlines the policies and procedures, or local standards, for the Coordinated Entry (CE) process in the Comal County and Greater New Braunfels Region. The regional policies and procedures do not supersede and adhere to the requirements in the [Texas Balance of State Continuum of Care Coordinated Entry Written Standards](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf).

## Texas Balance of State Continuum of Care Coordinated Entry Written Standards

The CE process is described in detailed on the following pages in the [TX BoS CoC CE Written Standards](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf):

* [Access, pages 29 through 33](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf#page=29)
* [Assessment, pages 34 through 41](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf#page=34)
* [Referral, pages 42 through 46](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf#page=42)
* [Prioritization, pages 47 through 51](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf#page=47)
* [Contacting Households, pages 52 through 55](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf#page=52)

Regional policies and procedures do not describe the CE process in detail and only describe details about the process that are specific to the Comal County and Greater New Braunfels Region.

# Planning

The Comal County CEPE is charged with managing the Coordinated Entry process in Comal County and the Greater New Braunfels area, ensuring that regional policies and procedures outlined in this document are implemented appropriately at the system, provider, and client level, and regularly monitoring progress towards ending homelessness.

The CE process in Comal County and the Greater New Braunfels area started operating on 09/01/2021.

The CE process covers: Comal County and parts of Guadalupe, Hays, and Bexar Counties that exist in the cities of New Braunfels, Garden Ridge, Bulverde, or Spring Branch.

## References for All CE Regions

| [](https://docs.google.com/spreadsheets/d/1Dceh5R9DTKQkHiesWbIuEXkNrBLX71ZVbykkNW-y9xE/edit?usp=sharing)[Current Coordinated Entry Planning Entity (CEPE) and Coordinated Entry Steering Committee (CESC) Members](https://docs.google.com/spreadsheets/d/1Dceh5R9DTKQkHiesWbIuEXkNrBLX71ZVbykkNW-y9xE/edit?usp=sharing) | [](https://docs.google.com/spreadsheets/d/1J2Q6bf02T33auPZ3x2wd59SR3mQRU8DfIZ2VKfLgfws/edit?usp=sharing)[Current Assessors in Training and HMIS Users with Access to the CE Workgroup](https://docs.google.com/spreadsheets/d/1J2Q6bf02T33auPZ3x2wd59SR3mQRU8DfIZ2VKfLgfws/edit?usp=sharing) | [](https://drive.google.com/drive/folders/1wn6ZvT115ISnZVYET4HeGZxM0qguudvs?usp=sharing)[GOOGLE DRIVE: Each Region’s Governance Documents](https://drive.google.com/drive/folders/1wn6ZvT115ISnZVYET4HeGZxM0qguudvs?usp=sharing) |
| --- | --- | --- |

## Participating Agencies

The following agencies are participating in CE in Comal County and the Greater New Braunfels area.

| Agency Name | Type of Funding Source |
| --- | --- |
| Salvation Army New Braunfels | Community Development Block Grant (CDBG), Barriers Fund Program (CSBG-CV), EFSP, Private Funding |
| NB Housing Partners | Emergency Solutions Grant Program |
| Crisis Center of Comal County | HHSC, OOG, OAG, Community Development Block Grant (CDBG), VAWA, VOCA, Private Funding, Barriers Fund Program (CSBG-CV), EFSP |
| Family Promise of Greater New Braunfels | Private funding |
| Connections Individual and Family Services | DHHS Basic Center Program (For RHY) |
| STEPS | Private funding |
| Family Life Center | Community Development Block Grant (CDBG), Private Funding |
| Hill Country MHDD | Medicaid |

For some Participating Agencies, participation in CE is required by their funding sources. These funding sources include the Continuum of Care (CoC) Program1, Emergency Solutions Grant (ESG) Program[[1]](#footnote-0), Support Services for Veteran Families (SSVF) Program[[2]](#footnote-1), and VA Medical Centers (VAMC).[[3]](#footnote-2) At minimum, Participating Agencies with these funding sources must participate in CE by filling all vacancies in their projects with referrals made by the local CE process, or serving as a Receiving Project. Agencies may also participate in CE by serving as an Entry Point, which means completing assessments and making referrals, **and** a Receiving Project, filling vacancies with referrals made by CE.

## Entry Points

The CE process is decentralized meaning there will be multiple Entry Points. The following Participating Agencies serve as Entry Points.

| Agency Name | Phone Number | CE Operational Days and Hours |
| --- | --- | --- |
| Salvation Army617 S Business I-35New Braunfels, TX 78130 | 830/608-9129 | CE Operational Days and Hours Monday-Friday 9 am to 2 pm |
| Family Life Center5513 S IH35 Frontage Rd.New Braunfels, TX. 78132 | 830/625-7100 | CE Operational Days and Hours Monday-Thursday 9am-4pm |
| Crisis Center of Comal County1547 E Common St.New Braunfels, TX 78130 | 830/620-HELP  | CE Operational Days and Hours 8am-5pm and 24 hours for crisis shelter for women and families |
| NB Housing Partners655 Landa St.New Braunfels, TX. 78130 | 830/312-8304 | CE Operational Days and Hours 10am-8pm and 24 hours for crisis shelter for adults |
| Connections Individual and Family Services, Inc.1414 W San Antonio St.New Braunfels, TX. 78130 | 830/629-6571 or 800/532-8192 | CE Operational Days and Hours 8am-5pm and 24 hours for crisis shelter for youth |

*A list of Entry Points across the TX BoS CoC can be found on Texas Homeless Network’s website here:* <https://www.thn.org/texas-balance-state-continuum-care/coordinated-entry/>

All Entry Points are ADA accessible

Assistive technology is not provided for individuals with visual or hearing impairments.

Entry Points can assist households with Limited English Proficiency. All Entry Points assist households with Limited English Proficiency, with the exception of NB Housing Partners, which utilizes partner agencies to assist with providing bilingual (Spanish/English) translation for assessment.

Households can connect to CE outside of CE operating hours. Households can call each Entry Point that does not provide 24-hour services and leave a voicemail after hours; an Assessor will follow up with the household the following business day. Three agencies provide 24 hours services: Crisis Center of Comal County, Connections Individual and Family Services, and NB Housing Partners. Please see the above chart for further details.

### Entry Points for Subpopulations

The CE process includes Entry Points that are designated for specific subpopulations. These Entry Points focus their services on specific subpopulations, but intake staff can do Coordinated Entry enrollments with any eligible presenting households. The following Participating Agencies serve as Entry Points for specific subpopulations.

| Entry Point – Agency Name | Specific Subpopulation Served |
| --- | --- |
| Crisis Center of Comal County  | Victims of Domestic Violence, Females Without Children and Adults With Children  |
| Family Promise of Greater New Braunfels |  Adults With Children |
| NB Housing Partners | Adults Without Children |
| Connections Individual and Family Services | Unaccompanied Youth |

Emergency services, including family violence centers, emergency shelters, and other short-term crisis residential projects, should operate with as few barriers to entry as possible and be available to anyone who needs and wants them. People must be able to access emergency services independent of the operating hours of the CE process. Therefore, participants must be ensured access to emergency services during the hours when the CE enrollment process is not operating. Ultimately, a household’s participation in CE cannot be a requirement for accessing emergency services.

Agencies cannot use prioritization standards for their emergency standards, even if they use prioritization standards for other programs or projects in which they are involved, including Rapid Re-Housing, Transitional Housing, Permanent Supportive Housing, etc.).

Households may access emergency services outside of CE operating hours by contacting one of the 24-hour agencies described above:

* Crisis Center of Comal County: 830/620-HELP
* NB Housing Partners: 830/312-8304
* Connections Individual and Family Services: 800/532-8192
* Hill Country MHDD/Mobile Crisis Outreach Team (MCOT): 830/620-6221 or (for MCOT) 877/466-0660

# Data Management

The CE process in the Comal County and Greater New Braunfels Region follows the data standards and management as outlined in the [TX BoS CoC CE Written Standards on page 27](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf#page=27). In short, this includes:

* Using ClientTrack as the Homeless Management Information System (HMIS) or a comparable database.
* Following the HMIS Data Standards outlined by HUD.
* Entering information within 24 business hours if information cannot be entered in real time and directly into HMIS or a comparable database.
* Re-training with the TX BoS CoC if an HMIS user does not log into HMIS for 45 days and their access to HMIS is temporarily terminated on day 46.
* Adhering to the privacy protections as outlined in the [TX BoS CoC HMIS Privacy Policy](https://www.thn.org/texas-balance-state-continuum-care/hmis/hmis-start-kit/).
* Reviewing the [TX BoS CoC HMIS Release of Information (ROI)](https://www.thn.org/texas-balance-state-continuum-care/hmis/hmis-start-kit/) with a household before entering any information into HMIS.

# Access

In the Comal County and Greater New Braunfels Region, the CE process follows the Access Process outlined in the [TX BoS CoC CE Written Standards on pages 29-33](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf#page=29). In short, this process includes:

* Introduction: Referral to a local Victim Service Provider (VSP), Reviewing HMIS and Privacy Protections
* Diversion
* Eligibility for Coordinated Entry

While all households at risk of or experiencing homelessness can access Entry Points, only individuals and families who are literally homeless or fleeing or attempting to flee domestic violence can complete a CE enrollment. Literally homeless and fleeing or attempting to flee domestic violence are Categories 1 and 4 respectfully of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) “Homeless” definition.[[4]](#footnote-3) Definitions for these two categories are explained below.

**Category 1 Literally Homeless – Any individual or family who lacks a fixed, regular, or adequate nighttime residence, meaning they either:**

* Have a primary nighttime residence that is a public or private place not meant for human habitation or
* Are 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
* Are 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 4 Fleeing or Attempting to Flee Domestic Violence - Any individual or family who:**

* Is fleeing or attempting to flee domestic violence and
* Has no other residence and
* Lacks the resources or support networks to obtain other permanent housing.

Households that are not literally homeless or fleeing domestic violence should be connected with other community and mainstream resources and encouraged to connect with their social support networks, including family, friends, or co-workers.

It is important to note that youth may be defined in Category 4 if they are fleeing or have fled their household due to violence that has taken place in the house or has made them afraid to return to the house. Additionally, to qualify under Category 4, the youth must have no safe, alternative housing, resources or support networks to maintain or obtain permanent housing.[[5]](#footnote-4)

If a household meets the HEARTH Homeless definition for Category 1 or 4 **and** their housing crisis is not resolved through Diversion, which may take up to 14 days, they are eligible for CE enrollment. Next, Assessors describe CE, its purpose and local process for the household, and the household confirms whether they would like to enroll into CE. Guidance on how to describe CE is outlined in the forthcoming TX BoS CoC CE Assessor Manual.

Regions must ensure that all people who are experiencing literal homelessness or fleeing or attempting to flee domestic violence have fair and equal access to CE enrollment, regardless of the location or method by which they access the system.

## Suspended Households

In many cases, households suspended or banned from agencies will not be able to readily access many needed services because of the suspensions or bans in place. If a household is not allowed to enter the Entry Point(s) in their region, they should still be assisted with a CE enrollment and referrals. Connecting households to resources is a must and should not be dependent on suspensions or bans. For the most at risk household to receive services, it is advised for agencies to continue participating in mediation conversations with households with current suspensions/bans when possible.

The process for assisting households with a suspension or ban from an agency through CE is:

Salvation Army or New Braunfels Housing Partners will contact the suspended or banned household for screening and Coordinated Entry. If the household is banned from Salvation Army, contact will be made with New Braunfels Housing Partners, and if access is banned through New Braunfels Housing Partners access will be made through Salvation Army.

# Assessment

In the Comal County and Greater New Braunfels Region, the CE process follows the Assessment Process outlined in the [TX BoS CoC CE Written Standards on pages 34-41](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf#page=34). In short, this process includes:

* Enrolling the Household into Coordinated Entry
* Collecting HMIS Universal Data Elements
* Completing the Assessment – In the TX BoS CoC, Assessors will use two assessment tools: The Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) version 2.0 and the Family-Vulnerability Index-Service Prioritization Decision Assistance Tool (F-VI-SPDAT) version 2.0.

## Assessment Review Request

An assessment review request is a request to review a completed assessment or complete a new assessment. It can be requested by Assessors at Entry Points, staff members at a Participating Agency, or households who have concerns about the accuracy of an assessment.

An Assessment Review Request can be accomplished at any of the CE Entry Points or by completing the Assessment Review request form on the website of the Comal County Homeless Coalition.

All Assessment Review Requests sent to a single CE Entry Point will be received, reviewed, and responded on the next business day following receipt. Assessment Review Requests that are received by the website will be routed to NB Housing Partners for review and response within 24 hours. Each request form will also provide emergency numbers for after-hours emergency services.

## Grievances

A grievance is an official statement of a complaint regarding a household’s experience in the CE process. It can be submitted by households participating in CE to the CEPE.

Grievances may be submitted through a link on the website of the Comal County Homeless Coalition. Paper grievances may be routed to the link for any received by a participating CE agency. All grievances will be routed to each CE participating agency within 2 business days, to be reviewed and a plan of action determined at the next scheduled CEPE Meeting. A small committee of 3-5 members will be assigned to review and determine steps to handle any grievances that require more expedient action. A final determination of steps to be taken will be shared with the household or entity that files a grievance within 1 month of the grievance submission, or within 5 business days for grievances in which urgent action is required based on the nature of the grievance.

## Appeals

If Assessors at Entry Points, staff members at a Participating Agency, or households have a concern with the result of an assessment review request or a grievance that was originally submitted to the CE region, they can submit an appeal to the Systems Change Team at Texas Homeless Network, Lead Agency for the TX BoS CoC.

An individual can submit an appeal by completing the TX BoS CoC Appeals form and emailing the completed form to CE@THN.org.

After, the Systems Change Team will acknowledge and review the request within ten (10) business days and give a response and/or direction to the CEPE.

# Referrals

In the Comal County and the Greater New Braunfels CE Region, the CE process follows the Referral Process outlined in the [TX BoS CoC CE Written Standards on pages 42-46](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf#page=42). This process involves all Participating Agencies and multiple steps. In short, it includes:

* Advising the Household (Assessors at Entry Points)
* Recording Referrals (Assessors at Entry Points)
* Making Warm Referrals (Assessors at Entry Points)
* Recording Unmet Needs (Assessors at Entry Points)
* Recording CE Statuses Outside of the Enrollment (All Participating Agencies)
* Acknowledging a Referral (Staff at Receiving Agencies)

## Low, Moderate, and High Intensity Interventions

For Comal County, the interventions focus on low, moderate, and high intensity housing interventions. This is because the Comal County CE process includes agencies with funding outside of ESG, CoC, and SSVF Program funding. The definitions of low, moderate, and high intensity housing interventions are explained below and included in the [eligibility matrix](#_heading=h.1pxezwc):

|  | **Low Intensity Interventions** | **Moderate Intensity Interventions** | **High Intensity Interventions** |
| --- | --- | --- | --- |
| **Program Description** | Low Intensity Interventions refer to resources intended to divert the household from the housing crisis response system, and these households may or may not be literally homeless. It is meant to prevent further crises. Homelessness Prevention is a type of low intensity intervention that is open to those at risk of homelessness. | Moderate Intensity Interventions refer to resources intended to provide housing resources for households experiencing homelessness. | High Intensity Interventions refer to resources intended to provide long-term housing resources for households experiencing homelessness. |
| **Essential Project Elements** | These resources may look like diversion and/or problem-solving conversations with households to rapidly connect to resources already available to them. These resources may or may not be tied to financial assistance. | These resources provide time-limited rental assistance (less than 24 months) and generally include supportive services. | These resources provide long-term housing (greater than 24 months) and generally include supportive services. |
| **Time Frame** | Time-limited and varies based on program; generally considered lightest touch | Time-limited and varies based on program | Non-time limited |
| **At Risk of Homelessness** | These households do not complete the VI-SPDAT or F-VI-SPDAT because they do not meet the criteria for literally homeless. | Not Applicable | Not Applicable |
| **Literally Homeless VI-SPAT Score** | Between 0 and 3 | Between 4 and 7 | 8+ |
| **Literally Homeless F-VI-SPDAT Score** | Between 0 and 3  | Between 4 and 8 | 9+ |

##

## Receiving Agencies

In the Comal County and the Greater New Braunfels CE Region, the CE process will record and make warm referrals to the following Receiving Agencies.

| **Agency Name****Address****City, State Zip Code** | **Access to HMIS (ClientTrack) for the TX BoS CoC?****(Yes/No)** | **Services Provided** |
| --- | --- | --- |
| Salvation Army617 S Elliot KNoxNew Braunfels, TX 78130 | Yes | Hotel AssistanceLow Intensity - Housing/Utility AssistanceModerate Intensity Housing - Transitional Housing, Housing Assistance |
| Family Life Center5513 S IH35 Frontage Rd.New Braunfels, TX. 78132 | Yes | Low Intensity - Housing/Utility AssistanceModerate Intensity Housing |
| Crisis Center of Comal County1547 E Common St.New Braunfels, TX 78130 | No - comparable database | Emergency Shelter, Street Outreach, Moderate Intensity Housing, Transitional Housing |
| NB Housing Partners655 Landa St.New Braunfels, TX. 78130 | Yes | Emergency ShelterLow Intensity - Housing/Utility AssistanceModerate Intensity Housing |
| Connections Individual and Family Services, Inc.1414 W. San Antonio St.(PO Box 311268)New Braunfels, TX 78130 (78132-1268) | Yes | Emergency Shelter |
| Family Promise of Greater New BraunfelsPO Box 311866New Braunfels, TX 78131-1866 | No | Emergency ShelterModerate Intensity Housing - Transitional Housing |
| New Braunfels Food Bank1620 S Seguin AveNew Braunfels, TX 78130 | No | Moderate Intensity Housing - Future housing project |
| New Braunfels Community Resources563 Ventura DriveNew Braunfels, TX 78130 | No | Moderate Intensity Housing - Tenant-Based Rental Assistance |
| New Braunfels Housing Authority300 Laurel LaneNew Braunfels, TX 78130 | No | Moderate Intensity Housing - Public Housing, Housing Choice Voucher |
| Habitat for Humanity1269 Industrial St.New Braunfels, Tx. 78130 | No | Moderate Intensity Housing |
| Community Council of South Central Texas111 W San Antonio St. Suite 210-3New Braunfels, TX. 78130 | No | Low Intensity - Housing/Utility AssistanceModerate Intensity Housing - TBRA for persons with disabilities |
| Prospera Housing Community Services:Bavarian Manor Apartments 614 Bavarian Dr.New Braunfels, TX 78130Village Circle Apartments101 Glenbrook Dr. ENew Braunfels, TX. 78130 | No | Moderate Intensity Housing - Low Income Housing |
| National Church Residences℅ Eden Heights627 LakeviewNew Braunfels, TX 78130 | No | Moderate Intensity Housing |

## Maintaining the Eligibility Matrix

An Eligibility Matrix is a shared list of the resources available in a region. It is a critical piece of the referral process. It is also a living document which is updated as changes happen in the region. The purpose of the matrix is to assist Assessors in providing the most accurate description of a project and determining whether the household meets eligibility criteria or project-specific requirements, which in turn, will aid in making appropriate referrals.

The Eligibility Matrix includes resources, such as shelter, housing, supportive services targeted to people experiencing literal homelessness or fleeing or attempting to flee domestic violence, and other supportive services.

The Eligibility Matrix for Comal County is located here: <https://docs.google.com/spreadsheets/d/1gEgiYfZVSDXSzvDtXw3xyaEFScWmBuZ6uT4ObtCaE5Q/edit?usp=sharing>

The CEPE will complete a thorough review of the eligibility matrix for changes, additions, or updates as part of their meeting at least 2 times per year. More frequently, the agency will utilize assistance from the McKenna Foundation to review and update the eligibility matrix monthly.

## Receiving Agencies without Access to HMIS

Provider profiles in HMIS are used for tracking and recording referrals. These are living records in HMIS of agencies that provide services across the TX BoS CoC. Provider profiles are created in HMIS for agencies regardless of their participation in HMIS. As a result, Assessors can record referrals for Receiving Agencies with **and** without access to HMIS.

If a Receiving Agency has access to HMIS, they can find a list of referrals recorded for them in the Provider Workspace in HMIS. The Receiving Agency must update the result of the referral for a client and communicate with other Participating Agencies about the result of the referral, for example during CEPE or case conferencing meetings.

Please note that this is not the case for Receiving Agencies without access to HMIS. Provider profiles created in HMIS for Receiving Agencies without access to HMIS are known as “Ghost profiles”. The purpose of “Ghost profiles” is to keep a record of referrals made to these agencies. The results of referrals made to Receiving Agencies without access to HMIS do not need to be updated. As a result, it is essential that Assessors complete warm referrals. This can be making a phone call referral in real time, preferably with the household present.

# Prioritization

Prioritization refers to the process by which all persons in need of assistance who access CE are prioritized for housing interventions. Prioritization ensures that people with the most severe service needs and vulnerabilities are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. In regions, there may be time in between when a referral for a household is made to when a project has availability. During this time, regions must ensure [emergency services](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf#page=22) are available to all households who are eligible for those services regardless of perceived vulnerability.

A prioritization process in a region can be implemented in various ways:

1. Receiving Projects can apply the prioritization standards for their housing intervention type to the referrals received in HMIS; or
2. Receiving Projects can contact a CEPE member or an Entry Point to determine which household they need to contact to fill their availability;
3. The community can prioritize availabilities in a collaborative approach through [Case Conferencing](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf#page=24); or
4. A combination of the approaches above.

## Prioritization Standards for Receiving Projects Not Funded by the CoC Program

In the Comal County and Greater New Braunfels CE Region, Receiving Agencies with projects not funded by the CoC Program follow prioritization standards approved by the CEPE.

Any agency choosing to become a receiving agency will submit a brief CE Receiving Agency application located on the Comal County Homeless Coalition website. The Comal County CEPE Members will then review and discuss the application at the next scheduled CEPE meeting and determine whether or not to include the applicant agency, then convey any clear expectations for joining or steps to take before being allowed to join if the application is denied. Basically, any receiving agency must be willing to participate in at least 3 CE meetings per year and agree to utilize standard release of information forms developed by the CEPE.

# Contacting Households

In the Comal County and Greater New Braunfels CE Region,the CE process follows the Contacting Household Process outlined in the [TX BoS CoC CE Written Standards on pages 52-55](https://www.thn.org/wp-content/uploads/2020/07/TX-BoS-CoC-CE-WS-Version2-Final.pdf#page=52). In short, this process includes:

* Contacting Households
	+ Attempting to Contact
	+ After Making Contact with a Household
	+ Decline of Assistance
* Updating the Result of a Referral

## Contacting Household Policy

The region follows the TX BoS CoC policy for contacting households. When contacting a household, there must be a minimum five (5) attempts to contact over the course of at least ten (10) business days.

Receiving Agencies with access to HMIS must document the attempts as a service in HMIS. Receiving Agencies with access to HMIS can select “Contact Attempt #1” through “Contact Attempt #5” as a service for households. By adding contact attempts as a service, all HMIS users can see the Receiving Agency’s attempt to contact the household for an opening.

## Exiting Households from Coordinated Entry

Any agency with access to HMIS can exit a household from their CE enrollment for the following reasons:

* They have entered a permanent residential project type or is other known to have found permanent housing.
* They are deceased.

In addition, if a Receiving Agency with access to HMIS is enrolling a household into a housing program, they must also exit the household from CE.

# Serving Survivors

The TX BoS CoC recognizes the unique needs of households fleeing or attempting to flee domestic violence, dating violence, sexual assault and stalking. The process for assisting these households has been included in each section of the CE process in the TX BoS CoC CE Written Standards, version 2.0 (Access, Assessment, Referral, Prioritization, and Contacting Households).

All Participating Agencies, especially in regions in which there is not a VSP serving as an entry point, must assist these households according to their needs, experiences, and preferences, including:

* If the household’s primary concern is safety, the Entry Point must provide a private location for the household while staff members attempt to connect them to a local hotline or VSP for immediate support and/or help. The household can be connected to the CE process at a later time.
* At the beginning of the CE process, Assessors provide an opportunity for households to seek services from a local VSP and completing a warm referral for households that would like those services.
* Assessors must describe HMIS and privacy protections with households, including the risks in releasing their information with agencies using HMIS in the TX BoS CoC.
* Assessors completing a CE enrollment on paper for households fleeing or attempting to flee domestic violence **and** did **not** agree to the HMIS ROI. Assessors at VSP Entry Points may use a comparable database.
	+ Data collected in HMIS for households fleeing or attempting to flee domestic violence **and** did **not** agree to the HMIS ROI include only information pertinent for matching the household to and prioritizing them for housing intervention programs. This includes: de-identified first and last names, Veteran status if the household chooses to disclose, dates for project entry and project exit, the household’s assessment tool score, a phone number of an appropriate contact if the household chooses to disclose, referrals, and unmet needs.
* If a Receiving Project has access to HMIS and has identified a household with de-identified first and last names in HMIS for an opening in their project, the Receiving Project contacts the Entry Point that completed the household’s CE enrollment.
	+ The Entry Point serves as the liaison between the household and the Receiving Project.
	+ VSPs must follow the confidentiality provisions of the Violence Against Women Act and Family Violence Prevention and Services Act.

In Comal County the Crisis Center of Comal County serves as the Entry Point for households fleeing or attempting to flee domestic violence, dating violence, sexual assault, and stalking. To complete enrollment of the household in HMIS towards connecting them to housing intervention programs in the region, the Crisis Center of Comal County contacts and coordinates with Kellie Stallings at NB Housing Partners - First Footings.

# Evaluation

## Ongoing Feedback

Current and former participants and staff of CE can provide feedback about the CE process to Entry Points and Receiving Agencies.

In the Comal County CEPE Region, Participating Agencies will provide a link to the CE Consumer Satisfaction Survey for current and former participants to provide feedback. Consumers who do not have computer access and choose to complete the survey without assistance from the Participating Agency that provides the link may be given a hard copy of the survey, which can be submitted in a sealed envelope (provided by the partner agency) to the Partner Agency or to drop off the completed survey to the McKenna Foundation at 801 W San Antonio St., New Braunfels, TX 78130. Any hard copies must be routed to the McKenna Foundation, which will then be added to the website link for compilation with electronically submitted surveys. These compiled results will then be shared with the CEPE at the next monthly meeting for review and discussion. The CEPE will make a determination for next steps, then provide a written response to any feedback received on the Comal County Homeless Coalition website.

## Monthly Evaluation

The Coordinated Entry Planning Entity will meet monthly to evaluate the local CE process.

Each Participating Agency of the CEPE will evaluate the following:

* Number of unduplicated households served through CE
* Length of time households receive services
* Number of households completing services (defined as gaining permanent housing)
* Percentage of recidivism (households starting services, leaving, then accessing services again completing and accessing services again)

The measures will be collected through HMIS and/or an agency database with information shared via a shared secure site for data (such as a common Google Drive).

Participating CE agencies are responsible for collecting and sharing their data with the CEP. Each agency will designate one staff member to either email data or drop off paper surveys by the 10th of each month for data from the prior month. The data is then uploaded and compiled by the Mckenna Foundation and shared with the CE Administrator at NB Housing Partners. The CE Administrator at NB Housing Partners or designee will share the data at a monthly data committee formed by a member of the Mckenna Foundation and at least one assigned staff/volunteer responsible for data entry/analysis from the Participating Agencies. At the meeting, the data committee members will review any trends, gaps in services and/or issues with service delivery or coordination that need to be addressed. The committee will compile recommendations that will then be shared with CEPE System Change Team Members at the next scheduled meeting (which typically will fall later in the month than the data committee meeting).

## Yearly Evaluation

HUD requires that all CoCs conduct a yearly, in-depth evaluation of the CoC’s CE process.[[6]](#footnote-5) In the TX BoS CoC, THN will notify the CESC regarding details about the annual evaluation, including who will be conducting the evaluation, the timeframe the evaluation must cover, the method of evaluating, and the evaluation due date.

# List of Appendices

Appendix 1: Assessment Review Request Form

Appendix 2: Grievance Form

Appendix 3: Participant Satisfaction Survey

Appendix 4: Monthly Data Report Form

1. United States Department of Housing and Urban Development. (2017). *HEARTH: ESG Program and Consolidated Plan Conforming Amendments – ESG Program Interim Rule*. <https://www.hudexchange.info/resource/1927/hearth-esg-program-and-consolidated-plan-conforming-amendments/> [↑](#footnote-ref-0)
2. Supportive Services for Veteran Families Program. 80 Fed. Reg. 9604 (February 24, 2015) (to be codified at 38 C.F.R. pt. 62). <http://www.va.gov/HOMELESS/ssvf/docs/80FR9604_AO_50_SSVF_Final%20Rule_022415.pdf> [↑](#footnote-ref-1)
3. Department of Veteran Affairs. (2017). *VA Medical Center Participation in Continuums of Care Coordinated Entry System (VAIQ#7844648).* https://files.hudexchange.info/resources/documents/VA-Participation-in-Coordinated-Entry-Guidance.pdf [↑](#footnote-ref-2)
4. Homeless Emergency Assistance and Rapid Transition to Housing: Defining “Homeless”. 76 Fed. Reg. 75994 (December 5, 2011) (to be codified at 24 C.F.R. pts. 91, 582, and 583) [↑](#footnote-ref-3)
5. Department of Housing and Urban Development. (2015). *Determining Homeless Status of Youth*. <https://www.hudexchange.info/resource/4783/determining-homeless-status-of-youth/> [↑](#footnote-ref-4)
6. United States Department of Housing and Urban Development. (2018). *Coordinated Entry Management and Data Guide*. <https://www.hudexchange.info/resource/5758/coordinated-entry-management-and-data-guide/> [↑](#footnote-ref-5)