

## Prioritization Criteria

The CoC has adopted as a Guiding Principle that “The CoC will use data driven assessment to direct housing resources to helping those persons with the greatest vulnerability or most complex needs.” Therefore, the standardized assessment tool adopted by the CoC is based on the prioritization hierarchy recommended in HUD’s Notice CPD-14-012 *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status*. As such, the tool will prioritize those chronically homeless individuals and families who have the longest history of homelessness and greatest severity of service needs for permanent supportive housing. The CoC assessment tool is aligned with the abovementioned Notice CPD-14-1202 definition of persons with the greatest ‘severity of service needs’ as those for whom at least one of the following is true:

- History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; or
- Significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing. Severe service needs...should be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool that can identify the severity of needs.

If there are no chronically homeless households identified within the CoC’s geographic area, the CoC assessment tool will allow the community to prioritize those homeless individuals and families who have the longest history of homelessness and greatest severity of service needs for permanent supportive housing. Figure 1 shows the permanent housing prioritization matrix that will be used.

Figure 1. Permanent Supportive Housing Prioritization Matrix					
Priority Level	Household Type	Longest History of Homelessness	Most Severe Service Needs	From Street or Shelter	From Transitional Housing
1	Chronically Homeless	X	X	X	
2		X		X	
3			X	X	
4				X	
5	Literally Homeless		X	X	
6		X		X	
7				X	
8					X

## Prioritizing Homeless Consumers for Housing Interventions

Homeless households with the highest prioritization scores according to the Berks County CoC Housing Prioritization Tool will be prioritized for permanent supportive housing.

Rapid Re-Housing projects will prioritize homeless consumers according to the following criteria:

- Consumers from Coordinated Assessment with the longest lengths of homelessness,
- Consumers from Coordinated Assessment who are in unsheltered situations,
- Consumers from Coordinated Assessment who are in emergency shelter,
- Other consumers from Coordinated Assessment,

After the assessment process is complete, the agency assessment staff will score the tool and determine which housing interventions it says the consumer is prioritized for, if any, by looking at the priority scoring matrix.

1. *If a consumer's prioritization score indicates a high priority for permanent supportive housing, the Prioritization Committee (which consists of SO and PSH providers) will discuss possible housing openings. The Prioritization Committee members will all have access to the list of top priority consumers as well as eligible units that are available so that the consumer has a choice and a voice in their PSH placement.*
2. *If a consumer is prioritized for housing interventions, but there is not currently an opening at an appropriate program within the interventions, the client's information will be entered into HMIS and contacted by their case manager to assess if they are still interested in obtaining housing through the CoC on a bi-weekly basis. The client's contact information will be used to reach them when a suitable placement opens up.*
3. *If a consumer is prioritized for housing interventions, and the consumer and agency assessment staff are informed of an available housing unit or bed by the Prioritization Committee the agency assessment staff member should offer their recommendation to the consumer of which intervention they think is best (if there is more than one available option). The case manager of the referring agency will assist the consumer in gathering the required documentation, and with consumer consent, will upload the documentation in to the consumer's electronic record in HMIS. The case manager of the referring agency should then describe how the referral process will work, and detail the process of gathering eligibility documentation. The Prioritization Committee will then make a direct consumer referral to the provider agency via HMIS, email, or phone call. Then case management from the referring agency, and the provider agency receiving the consumer referral for the housing intervention will case conference and determine a work plan to gather the required documentation to expedite the consumer's admission into the provider agency's program (see below section on Documentation of Eligibility).*

4. *If a consumer that is prioritized and referred to a housing intervention program disappears or cannot be found within 5 business days by agency assessment staff, outreach staff, provider agency staff, or the Prioritization Committee, the Prioritization Committee will coordinate to offer the slot to the next most highly prioritized individual or family.*
5. *If a consumer is not currently prioritized for any housing interventions, agency assessment staff should explain why and offer any other services that are available to the consumer (e.g. connection to mainstream resources, help connecting with family or friends, etc.). The consumer should be referred to continued case management and other services to help them exit to permanent housing. The assessment process ends for the consumer at this point, however, they may be reassessed 90 days after their initial assessment.*

## Consumer-Declined Referrals

Agency assessment staff, through the administration of the standardized assessment tool and the assessment process (which includes consumer input as described above), will attempt to do what they can to meet all consumer needs while also respecting community-wide prioritization standards. However, if the Coordinated Assessment Team informs agency assessment staff that a unit or bed is available for a prioritized consumer in a particular housing intervention project and the consumer declines referral to that project, the agency assessment staff will notify the Prioritization Committee via call/email and will document the reason for refusal in the consumer's HMIS profile.

## Provider-Declined Referrals

There may be rare instances where provider agency staff do not accept a referral from the Prioritization Committee process. Refusals are acceptable only in certain situations, including:

- The consumer does not meet the project's eligibility criteria;
- The consumer would be a danger to others or themselves if allowed to stay at this particular project; and/or
- The consumer has previously caused serious conflicts within the project and was banned (e.g. was violent with another consumer or project staff).

If project staff determines a consumer is not eligible for their project after they have received the referral from the Prioritization Committee the agency assessment staff and the person experiencing homelessness must meet within 2 business days to determine the best next step for the consumer. If a program is consistently refusing referrals (more than 1 out of every 4) they will need to meet with the Prioritization Committee to discuss the issue that is causing the refusals.

## Consumer Grievances

The agency assessment staff member should address any complaints by consumers as best as they can in the moment regarding the assessment and referral process. However, when administering the initial standardized assessment, the agency assessment staff must inform all consumers of the process for filing a complaint.

Complaints that should be addressed directly by the agency assessment staff and their supervisors include:

- complaints about how they were treated by assessment staff
- assessment location conditions.

Any other complaints, including those regarding:

- violation of data agreements,
- fraudulent activity,
- discrimination, or
- attempts to operate outside of the coordinated assessment process,

should be referred to the Prioritization Committee for resolution. Any complaints filed by a consumer should be sent to Berks Coalition to End Homeless (BCEH):

Phone: 610-372-7222

Email: [Info@bceh.org](mailto:Info@bceh.org)

The complaint should include the grounds and nature of the consumer's grievance the name and contact information of the consumer so the Prioritization Committee can contact them and offer them the chance to appear before the committee.

## Provider Grievances

Providers should bring any concerns about coordinated assessment to the Prioritization Committee, unless they believe a consumer is being put in immediate or life-threatening danger, in which case they should deal with the situation immediately with the appropriate authorities or other partner agencies. A summary of concerns should be provided via email to BCEH. BCEH should then schedule for that provider's representative to come to the next available Prioritization Committee meeting so the issue can be resolved. If the issues need more immediate resolution, BCEH will be in charge of determining the best course of action to resolve the issue and communicating with the Prioritization Committee members.

## Documentation of Eligibility

The CoC's standardized assessment tool will prioritize consumers for housing interventions based on their length of homelessness and severity of service needs, but all referrals will adhere to program eligibility requirements.

Any and all staff assisting consumers in gathering eligibility documentation for program admission will ensure that records gathered show evidence that the individual or family meets the program eligibility criteria established in the CoC Program Interim Rule at 24 CFR 578.37 (Subpart D—Program Components and Eligible Costs) based on the definitions at 24 CFR 578.3. This will also apply to documentation of consumer income as stipulated at 24 CFR 578.77. The CoC's order of priority for obtaining evidence of consumer eligibility will be:

1. third-party documentation,
2. intake worker observations, and
3. certification from the person seeking assistance.

Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates entries are made. Evidence of the following must be gathered in accordance with HUD's Notice CPD-14-012 *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status*:

- chronically homeless status,
- homeless status,
- duration of the homelessness,
- evidence that the household experienced at least four separate homeless occasions over 3 years,
- evidence of diagnosis 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
- evidence of cumulative length of homeless occasions,
- evidence of severe service needs
- evidence that recipients are following the CoC's written standards for prioritizing assistance.

## RRH Client Contribution Policy:

All clients applying for Homeless Prevention or Rapid Re-housing Assistance must provide 50% of the requested amount. An assessment by the Case Manager will determine the client's ability to provide this contribution.

Homeless Prevention Assistance – is provided for utility shut off notices only such as electric or water – or to stop a court ordered eviction. Proof of the eviction must be maintained in the client file in the form of a copy of the notice from the District Judge. these cases, assistance may be provided to the client *for only this instance* and will not be ongoing. The client **MUST** contribute 50% of the total balance due. If the client is unable to contribute half of the total bill other sources for the client's contribution may be sought by the agency. ESG funds may not be used as the client contribution for Homeless Prevention clients.

In the case of Rapid Rehousing, it is understood that not all clients will be able to provide their 50% funding especially when the client being rehoused is literally homeless. Case Management will make every attempt to secure the client's contribution. In situations where no client contribution can be obtained, initial assistance can be as much as 100% of rental assistance **ONLY** when the client is being assisted with Rapid Re-housing funds and when no other client contribution sources are available. **We strongly encourage that subgrantees provide 3 months of Rapid Re-housing to clients at a minimum.** After the first month of ESG RRH assistance, the client must match the ESG Contribution at a rate of 50% or greater.

Timelines are based on maximum term of assistance; however, clients should be transitioned off of assistance in as short of a timeframe as is appropriate for them to successfully obtain housing stability. The agency may make this determination.

On a case by case basis, sub-grantees may be authorized to increase rental assistance, only when extenuating circumstances arise for a client. Some of these extenuating circumstances may include, but is not limited to, reunification with a child, loss of employment (income), drop in income, medical emergency/illness, and loss of other resources. In these cases, the sub-grantee will verify and document in each file the reasons for increasing financial assistance.

## Participant Eligibility (for TH Non-Youth Programs):

a. Households must meet the definition of homelessness and are currently staying at an emergency shelter before enrollment to TH project.

Waitlist Selection Process and Criteria:

Shelter staff will do an intake of all families and individuals and enter their information in ServicePoint within 5 days. TH program staff will follow the criteria below and select the candidate and notify the shelter staff. The Transitional Housing case manager will meet with the clients and determine final enrollment.

1. Household has to be staying in shelter at enrollment or be literally homeless staying on the streets or in a place not meant for habitation.
2. Household would need to meet all the barriers below. Otherwise, Rapid Rehousing should be considered the first referral.

- a. Lack of stable housing history (3 evictions in 2 years)
- b. Low education level (lower than a high school diploma or do not have GED)
- c. has little or no employment history

- 3. Households who have already been enrolled into a TH project will not be displaced if a household with a greater need presents in shelter.
- 4. Households, who are in the referral/screening process but have not yet been enrolled into a TH project, will be treated like any other households in the waitlist.
- 5. If two or more households have the same severity of need, whoever has the longest homeless history will be prioritized and served first.
- 6. A family that leaves the shelter before enrollment or during housing search period will not qualify for TH placement unless they present as homeless again at a later date.