



*Coordinated Entry Referral Management
for Victim Service Providers*

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Purpose:

To outline the specific steps Victim Services Providers (VSPs) will take to maintain client confidentiality and not enter any personally identifiable information into the Homeless Management Information System while also providing DV survivors with access to Coordinated Entry and receiving appropriate referrals off the community queue for United States Department of Housing and Urban Development Continuum of Care funded programs for Domestic Violence survivors.

Effective Date: May 1, 2024

Regulatory References:

1. United States Department of Housing and Urban Development 2004 Homeless Management Information System Final Notice:
<https://www.hudexchange.info/resource/1318/2004-hmis-data-and-technical-standards-final-notice/>
2. Violence Against Women Act: <https://www.hud.gov/vawa#openModal>

Definitions:

Continuum of Care (CoC): A collaborative funding and planning approach that helps communities plan for and provide, as necessary, a full range of emergency, transitional, and permanent housing and other service resources to address the various needs of homeless persons. HUD also refers to the group of service providers involved in the decision making processes as the "Continuum of Care." For the purposes of this document, this refers specifically to the Northern Nevada Continuum of Care.

Emergency Shelter: Any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless.

Homeless Management Information System (HMIS): HMIS is a local information technology system used to collect client-level data and data on the provision of housing and services to individuals and families at risk of and experiencing homelessness. Each CoC is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards.

Mainstream Service Provider: Any homeless service provider who is not a Victim Services Provider.

Personally Identifiable Information (PII): Defined in OMB M-07-16 as “...information which can be used to distinguish or trace an individual’s identity, such as their name, social security number, biometric records, etc., alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, mother’s maiden name, etc.”

Transitional Housing: A project that has as its purpose facilitating the movement of homeless individuals and families to permanent housing within a reasonable amount of time (usually 24 months). Transitional housing includes housing primarily designed to serve deinstitutionalized homeless individuals and other homeless individuals with mental or physical disabilities and homeless families with children.

Victim Service Providers (VSPs): A VSP is defined as a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Providers include rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs. A VSP is a designation at the agency level, not the project level. HUD standards prohibit VSPs from entering a person’s identifiable information into HMIS. Instead, a VSP is required to collect Personal Identifying Information (PII) and other HUD-required data in a relational database that is comparable to HMIS, referred to as a comparable database.

Violence Against Women Act (VAWA): The Violence Against Women Act is a comprehensive legislative package designed to improve criminal justice responses to sexual assault, domestic violence, dating violence, and stalking and to increase the availability of services for victims and survivors. VAWA was first passed by Congress in 1994, and was reauthorized in 2000, 2005, 2013 and 2022.

Background:

Coordinated entry is a process developed to ensure all people experiencing a housing crisis have fair and equal access to the community’s housing and homeless assistance resources and are quickly identified, assessed for, and connected to flexible housing and service options, including financial/rental assistance, voluntary supportive services, and other mainstream resources based on their self-identified needs, strengths, and goals. Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. Coordinated entry processes also provide information about service needs and gaps to help communities plan their assistance and identify needed resources. Victim service providers play an integral part in their community’s housing and homeless response system by providing permanent housing—including rapid rehousing, shelter, transitional housing, advocacy, and

supportive services for victims of domestic violence. Therefore, it is critical that these providers be included as full partners in the community's coordinated entry process. This will ensure that regardless of where an individual or family presents for assistance, they will be able to access housing and services tailored to their unique circumstances and needs.

HUD allows and actively promotes the full participation and integration of victim service providers into the CoC coordinated entry process. Specifically, HUD encourages CoCs to work with victim service providers within the CoC's geographic area to establish client driven, trauma-informed and culturally-relevant assessment and screening tools, as well as referral policies and procedures, to ensure that the coordinated entry process addresses the physical and emotional safety, and privacy and confidentiality needs of participants.

The VAWA definition of domestic violence was updated in 2022 and now includes any felony or misdemeanor crimes committed under the family or domestic violence laws of the jurisdiction receiving grant funding. Moreover, the use or attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior, by any one of the following:

- (1) a current or former spouse or intimate partner of the victim, or person similarly situated to a spouse of the victim;
- (2) a person who is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
- (3) a person who shares a child in common with the victim; or
- (4) a person who commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.

It is important to note that VAWA applies to all victims of domestic violence despite the gendered language associated with the name of the Act.

HMIS Requirements for VSPs

To protect clients, VSPs must enter HUD's required client-level data into a comparable database that is comparable to and complies with all HMIS requirements but is only accessible to the VSP. The survivor data reports the VSP program shares with HUD is in the aggregate (combined and does not include personal identifying information) to ensure survivor confidentiality.

Coordinated entry is a process developed to ensure all people experiencing a housing crisis have fair and equal access to the community's housing and homeless assistance resources. VSPs may receive CoC funding to operate an SSO-CE project and must work with their community to establish a process that is aligned with or parallel to the CoC's CE system.

Procedures for HMIS Data Entry

- A. If a client currently has a HMIS fully identified profile in HMIS and then are found to be actively fleeing DV by a mainstream agency:
 1. Staff at the mainstream resource will follow the de-identification procedures
 2. Staff at the mainstream resource will log the information in the agency key
 3. Notify CoC Matchmaker who will then keep it on the Matchmaker DV Community De-Identified Key
- B. If a client is actively fleeing DV and presents at a VSP with no existing profile in HMIS:
 1. VSP will enter client information in comparable database
 2. VSP will log client in the agency key
 3. If a CHAT is appropriate, then a de-identified profile will be entered into HMIS, CHAT will be conducted
 - i. If CHAT score is 15 or above, client is referred to Community Queue and VSP notifies Matchmaker who will log this client in the Matchmaker DV Community De-Identified Key
 - ii. If CHAT score is below 15, VSP maintains all further client information in comparable database.
- C. If a client is actively fleeing DV, presents at a VSP and has an existing profile in HMIS:
 1. VSP staff will follow de-identification procedures
 2. VSP will enter client information in comparable database
 3. VSP will log client in the agency key
 4. If a CHAT is appropriate, then a de-identified profile will be entered into HMIS, CHAT will be conducted
 - a. If CHAT score is 15 or above, client is referred to Community Queue and VSP notifies Matchmaker who will log this client in the Matchmaker DV Community De-Identified Key
 - b. If CHAT score is below 15, VSP maintains all further client information in comparable database.

Procedure for Referrals to Coordinated Entry

1. If a client is in HMIS de-identified and are at a mainstream resource:
 - i. Client should be on Matchmaker Key per the above outlined process
 - ii. Client will be referred to VSPs in HMIS when a DV specific opening is made available
 - iii. VSP will manage referral per current Coordinated Entry policy
2. If client is currently housed at a VSP (and have a de-identified profile in HMIS) and a DV specific opening is made available:
 - i. CoC funded VSPs will notify Matchmaker that a DV specific opening is available

- ii. Matchmaker will make a match for the top scoring presumed eligible client in that range and will notify CoC funded VSP that a referral has been made
 - iii. Matchmaker will log client on the Matchmaker DC Community De-Identified Key
 - iv. VSP will manage referral per current CE policy
- 3. When a referral is made to a VSP for a client that is full identified and then found to actively fleeing and is deemed eligible for the referral
 - i. Follow de-identification procedures.
 - ii. Enter in comparable database
 - iii. Log in agency key
- 4. When a referrals is made to a VSP and client for a client that is full identified is not eligible
 - i. Reject the referral in HMIS
- 5. When a referrals is made to a VSP and client is actively fleeing but client fully identified in HMIS but is not eligible for CE referral
 - i. Follow de-identification procedures
 - ii. Enter client into comparable database
 - iii. Log it in agency key

Monitoring referrals to VSPs from Coordinated Entry

CoC Matchmaker De-Identified Key Roles and Responsibilities

- 1. Maintain Coordinated Entry de-identified key
- 2. Facilitate communications between mainstream programs and VSPs on current referrals and referral status

VSP responsibility

- 1. VSPs are responsible for maintaining client confidentiality
- 2. VSPs are responsible for utilizing a comparable database
- 3. VSPs that have a HUD funded CoC program are responsible for APR submission
- 4. VSPs that have a HUD funded CoC program are responsible receiving referrals from the community queue and making eligibility determination in a timely manner

Mainstream provider responsibility

- 1. Mainstream providers are responsible for maintaining client confidentiality
- 2. Confirms with VSPs if a de-identified client is still enrolled in their program
- 3. Facilitate client communication for a deidentified client who has been referred to CE

Resources:

<https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-VSP-Comparable-Database-and-Reporting-Requirements.pdf>

<https://www.justice.gov/ovw/file/858106/dl?inline=#:~:text=VAWA%20takes%20a%20comprehensive%20approach,implementing%20programs%20to%20aid%20victims.&text=Currently%2C%20OVW%20administers%20several%20grant,formula%20grants%20and%20discretionary%20grants.>

https://www.hud.gov/sites/documents/OHC_PII042815.PDF