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**Sonoma County Homeless Coalition Coordinated Entry Committee (CEA)  
Agenda for March 5, 2024  
12:00pm-1:00pm Pacific Time**

**Zoom link:**

<https://sonomacounty.zoom.us/j/92281657937?pwd=SW42V2tOchdIY0o5OStQNfK3WUY4UT09>

#	Agenda Item	Packet Item	Presenter	Time
1.	Welcome, Roll Call and Introductions		Committee Chair	12:00pm
2.	Approval of agenda and February minutes (Action item)	1	Committee Chair	12:05pm
3.	Follow up. CEA recommendation to Board regarding CE compliance. (Action item)	2	Staff	12:15pm
4.	Changes to CE policies and procedures (Action Item)	3	Staff	12:30pm
5.	Public Comment on non-agenized items		Public	12:55pm

**PUBLIC COMMENT:**

*Public Comment may be made via email or during the live zoom meeting. To submit an emailed public comment to the CE committee email [Thai.Hilton@sonoma-county.org](mailto:Thai.Hilton@sonoma-county.org). Please provide your name, the agenda number(s) on which you wish to speak, and your comment. These comments will be emailed to all Board members. Public comment during the meeting can be made live by joining the Zoom meeting using the above provided information. Available time for comments is determined by the Committee Chair based on agenda scheduling demands and total number of speakers.*



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**Sonoma County Continuum of Care Coordinated Entry Advisory Committee (CEA)  
Executive Summary**

**Item:** 2. February meeting minutes

**Date:** March 5, 2024

**Staff Contact:** Thai Hilton [thai.hilton@sonoma-county.org](mailto:thai.hilton@sonoma-county.org)

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Agenda Item Overview

**SUMMARY**

The previous agenda is the proposed agenda for this meeting.

The attached meeting minutes contain all items discussed by the Sonoma County Homeless Coalition's Coordinated Entry Advisory Committee (CEA) at the February 5<sup>th</sup> CEA meeting.

**RECOMMENDED ACTION(S)**

Approve the agenda for the March 5<sup>th</sup> CEA meeting and CEA Minutes from the February.



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**Sonoma County Homeless Coalition Coordinated Entry Committee (CEA)**  
**Agenda for February 5, 2024**  
**12:00pm-1:30pm Pacific Time**

**Call to Order:** Matthew called meeting to order at 12:01PM

**1. Welcome and Introductions**

**a. Roll Call:**

- i. Present: Lauren Taylor, Kate Mather, Margaret Slyuk, Justin Milligan, Sasha Brown, Araceli Zavala, Kathleen Pozzi, Chessy Ethridge, Nathan Somersall, Sara Vetter, Mathew Verscheure.
- ii. Absent: None.

**2. Approval**

Maragaret motioned to approve agenda and Karla seconded.

Corrections to agenda Chessy's name misspelled and she was marked absent. Agenda approved with amendments to correct Chessy's name and status of attendance.

**3. Election of CEA Chair (Action Item)**

- a. Sasha nominated Matt to remain the Chair of the Committee.
- b. Vote passes with Ayes 13 no Nays

**4. Changes to CE policies and procedures (Action Items)**

- a. Staff provided overview of the appeals process for Coc Funded projects.
- b. Hunter made comment that the consequences for the agencies not in compliance with the policies could impact the agencies funding.
- c. Sasha brought up that there needs to be clarification to the policy relating to the number of incidents in a specific span of time. Currently the policy states "two or more times"
- d. Further discussion sought clarification around where monitoring letters go and how they are being used for future scoring and funding evaluation.
- e. Hunter clarified that his overall goal for this committee is to recommend to the Board some broader form of consequence for projects not in compliance with CE policies.
- f. Emily made a motion to approve the amendment to the policy removing the section which specified the exact number of times a project could be out of compliance before any action would be taken. Motion also made that committee would reconvene to further develop a recommendation to the board to address the consequences to projects not in compliance with policy. Sasha 2<sup>nd</sup> the motion.
- g. Public Comment: none
- h. Committee Vote: Passes with 13 Ayes; 0 Nays



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**5. Non-Agenda Items**

- a. Matthew recommended that the meeting duration be changed to one hour rather than one and a half hours.

**6. Next Steps:**

- a. Group will reconvene to develop the recommendation for the board.



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**Item:** 3. Follow up: CEA recommendation to Board regarding CE compliance. (Action item)

**Date:** March 5, 2024

**Staff Contact:** Thai Hilton [thai.hilton@sonoma-county.org](mailto:thai.hilton@sonoma-county.org) Hunter Scott  
[hunter.scott@homefirstscc.org](mailto:hunter.scott@homefirstscc.org)

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Agenda Item Overview

**SUMMARY:** In the last CEA Committee, the Committee recommended changes be made to the referral rejection and appeals policy and advanced to the Board. These were approved in the February 26<sup>th</sup> Homeless Coalition Board meeting. In addition, the Committee requested staff to return to CEA with suggested language for a recommendation the Committee could make to the board about how to implement funding scoring changes to support the referral rejection and appeals policy change.

**RECOMMENDED ACTION(S)**

Approve one of the recommendations below.



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**Option 1:**

The CEA Committee recommends strengthening funding scoring impacts to better align with the newly passed CES Rejection of Referrals procedure. While it is not the role of the CEA Committee role to develop or change Homeless Coalition funding scoring tools, the committee would submit a friendly recommendation to the Board and/or appropriate scoring tool workgroups to consider the following change:

**Including in the scoring tools a requirement that permanent housing projects comply fully with the CES Rejection of Referrals procedure within the last funding period, with enough associated points to impact funding likelihood. One suggested option could be requiring the loss of all points for Housing Retention, Exits to Housing, CE Compliance, and Housing First sections of any permanent housing project that does not comply with this policy in the funding cycle being analyzed for scoring.**

The option named above would not require other sections of the scoring tool to be lessened in value or shift points from other sections to CE compliance.

This change would ensure that if a project reaches the point of attempting to reject a referred participant, has that rejection request denied by the CES Case Conference and CEA Appeals Subcommittee, and proceeds to ignore that decision and deny the applicant, they would be more likely to have their funding impacted than current tools would allow. Current scoring tools used in the CoC competition and local NOFA do measure CES compliance with a high point value but not compliance with this policy specifically, and it is currently possible for projects to ignore this policy and still be scored highly.

The new Rejection of Referrals policy as passed by the Coalition board describes the following result when a provider ignores a CES Case Conference and CEA Appeals Subcommittee decision: “These findings shall be included in a staff report for any funding the provider applies for and could result in the loss of all Coordinated Entry scoring for the project in the next funding cycle.” The change recommended above would create a stronger pathway to the result described in the Policy.

**Option 2:**

CEA committee could direct the Chair of the committee to send a letter the CoC board outlining the committee’s concerns about CE compliance and its effect, or lack thereof, on funding and ask the board to direct future funding scoring groups to consider ways to enhance scoring on housing first and Coordinated Entry compliance. This option would provide more leeway for the board and funding working groups to consider how to achieve better CE and Housing First compliance.



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Sonoma County Continuum of Care Coordinated Entry Advisory Committee (CEA)  
Executive Summary

**Item:** 4 Updates to Coordinated Entry Policies and Procedures

**Date:** March 5, 2024

**Staff Contact:** Thai Hilton [thai.hilton@sonoma-county.org](mailto:thai.hilton@sonoma-county.org)

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Agenda Item Overview

Staff will regularly provide updates to the Coordinated Entry policies and procedures. A description of the changes and rationale is below.

Recommendation

Approve the updates to the CE policies and procedures.



#### Change #1: Referrals for DV survivors outside Case Conference

Reasoning: CES does not refer to any current DV specific housing projects. Because our system does not have a DV specific project, we would like to accommodate that population by allowing an offline, confidential Case Conference for DV survivors referrals to housing projects. This was brought to our attention as a need because a participant who is a DV survivor has requested a reasonable accommodation to have a confidential referral Case Conference.

#### Change #2: Immigration Confidentiality

Reasoning: Many systems are moving to protect participant information that could potentially be used for harm. The SoCo HMIS Committee just adopted this policy and CES would like to adopt it as well to remain in sync with HMIS policies. It is common practice, but there is no current CES policy restricting sharing information regarding immigration.

#### Change #3: Offering deidentification for gender nonconforming participants

Reasoning: Current practice is to offer to everyone to be entered as de-identifiable. CES training explicitly states this and annual shadowing covers de-identifiable compliance. Current policy does not state it must be offered to everyone- only to those who request it or refuse to sign the ROI.

#### Change #4: Removed differentiation between TAY RRH prioritization and non-TAY RRH prioritization.

Reasoning: At request of the sole TAY RRH provider, TAY RRH prioritization will be aligned with standard RRH prioritization. Previously TAY RRH referrals had been prioritized for the top of the TAY CES BNL, with an explicit expectation that TAY RRH providers engage in the transfer process to PSH when needed and the participant is eligible. TLC had indicated that they no longer have capacity to handle the vulnerability level this results in.

#### Change #5: Aligned CES Policies and Procedures required collection of initial eligibility documents list with the Street Outreach Standards.

Reasoning: Aligning policies across Sonoma County Homeless Coalition Documents.

#### Change #6: Clarifying CES Case Conference referral decision policy

Reasoning: Currently it is unclear how CES Case Conference should proceed when it is determined that the needs of a participant will not be met by the services offered through a housing referral they are prioritized





for. Added a clarification to the Uniform Referral Procedure that CES Case Conference, or a smaller group of partners involved in the participant’s case and convened by the Operator, shall identify an alternative housing plan or option that the participant can likely access within six months, or the participant must be offered the referral available. In many cases the goal may be to identify additional services in the community to ensure the participant can be successful with the referral they are prioritized for.

P + P Language changes below, italicized and underlined where a change is made and struck through where a deletion occurs.

**Change:**

Referrals to Housing Programs Dedicated to Survivors of or Those Fleeing Domestic Violence

Referrals to housing programs dedicated to survivors of or those fleeing domestic violence shall be made by phone between CES Operator and housing provider, and will not be presented at CES Case Conference, to ensure compliance with the Violence Against Women Act and protect participant confidentiality.

**Change:**

Privacy Protections

The Homeless Coalition ensures adequate privacy protections of all participant information per the HMIS Data and Technical Standards (CoC Interim Rule – 24 CFR 578.7(a)(8)). All providers participating in Coordinated Entry must undergo training provided by the HMIS Technician II and CES Operator before gaining access to the CES By-Name-Lists. Participant consent is obtained in a uniform written release of information and is stored in a secure location. If the participant agrees to data sharing on their release of information, that release of information shall be uploaded into the CES dashboard on HMIS. Participants are informed of all cooperating agencies who may have access to their information for purposes of referral through the CE process. All users of HMIS in cooperating agencies in CE are trained by the HMIS Administrator and CES Operator on data collection, management, and reporting.



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The Homeless Coalition prohibits denying services to participants if they refuse their data to be shared unless Federal statute requires collection, use, storage, and reporting of a participant's personally identifiable information as a condition of program participation. The Homeless Coalition only shares participant information and documents when the participant has provided written consent through the CES Release of Information.

Staff shall not share specific diagnoses nor domestic violence victim status of participants when entering data into the CES programs in HMIS or participating in CES Case Conference. CES Cooperating Agencies share information on a need-to-know basis to protect confidentiality and safety of participants (in accordance with the Violence Against Women Act), and Coordinated Entry Systems are prohibited from making prioritization decisions based on a particular disability or diagnosis (HUD Notice CPD-17-01).

*No information regarding a household's immigration status may be shared within the CES HMIS project.*

### **Change:**

#### Participant Right of Refusal

Participants may refuse to answer assessment questions. However, doing so may limit the participant's possible permanent housing and service opportunities if the questions that are not answered are related to eligibility criteria for specific programs. The CES Assessment does not require that the participant share information about a specific disability if the participant does not wish to do so. Specific disability information is only used to determine whether the person is eligible for a certain program.

Participants may also refuse to sign a CES or HMIS ROI, or to answer the identifying questions in the HUD Entry Assessment for the CES HMIS program enrollment. In these cases the Access Point can complete the De-Identifiable Enrollment process, in accordance with the Sonoma County HMIS Policies and Procedures and the publication "How to Anonymously Enter a Client into HMIS, found here:

<https://sonomacounty.ca.gov/development-services/community-development-commission/divisions/homeless-services/providers/sonoma-county-hmis>

*All participants must be offered de-identifiable enrollment into HMIS at the time of assessment. A new ROI may need to be collected if a participant elects to become de-identified at a later date.*



It is recommended that Cooperating Agencies develop their own Policy and Procedure for safely maintaining records that link de-identified client codes to identifying information in a central location and accounting for staff transition after a de-identified CES Assessment has been completed. When these clients are referred to housing, it is important that the Access Point be able to contact the client and ask if they wish to be connected to the housing provider they have been referred to, at any point after CES Assessment is completed.

**Change:**

*CES Assessment step 5) Collection of Initial Eligibility Documents*

- 1) At point of initial CES Assessment and ongoing, the Access Point shall collect copies of program documentation that verifies potential eligibility criteria for housing programs the participant may be referred to. Access Points shall collect initial documentation available to the participant at point of Assessment, and within staffing availability support the participant in collecting ongoing documentation. This may include, but is not limited to:
  - a. Homelessness verification letters
  - b. Documentation of disabling condition from a qualified medical provider, or SSI/SSDI letter
  - c. Photo Identification
  - d. Social security card
  - e. Award letters
  - f. Birth Certificate (if needed)
  - g. Verification of disability



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- h. DD-214 form (if applicable)
- i. Service Animal/emotional support animal documentation (if applicable)
- j. Medical card
- k. CalFresh Card
- l. Copy of housing voucher (if applicable)

**Change:**

Prioritization for Rapid Rehousing

*Non-TAY-Dedicated Rapid Rehousing*

Participants who receive referrals prioritized according to community standards and scoring between 4 and 8 on the Total Prioritization Score shall be prioritized for Rapid Rehousing services first before moving to scores below 4.

*Procedure:*

- 1) Participants who are referred to Rapid Rehousing shall be included in the current CES Priority Group (see definitions) based on the highest Total Prioritization Score on the CES By-Name-Lists, 8 and under.



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- 2) Exceptions shall be made to those who are brought to CES Case Conferencing for Enhanced Assessment and Prioritization. See Enhanced Assessment and Prioritization under E. Referral for details.

**Change:**

*TAY-Dedicated Rapid Rehousing*

TAY-dedicated Rapid Rehousing openings are dynamically prioritized based on participant preference for the most vulnerable TAY. TAY-dedicated Rapid Rehousing programs shall utilize the Progressive Engagement Transfers policy and procedure to transfer participants to PSH when necessary.

*Procedure:*

- 1) Participants shall be who are referred to TAY-dedicated Rapid Rehousing shall be included in the current CES Priority Group based on the highest Total Prioritization Score on the TAY CES By-Name-List.
- 2) Exceptions shall be made to those who are brought to CES Case Conferencing for Enhanced Assessment and Prioritization. See Enhanced Assessment and Prioritization under E. Referral for details.

**Change:**

Uniform Referral Procedure

- 1) All housing referrals, except those identified below, shall be identified and unanimously agreed upon by the community present at the CES Case Conference. Exceptions are:



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- a. Participants who are survivors of DV may request an offline, confidential referral Case Conference with CES staff
  - b. TAY participants meeting the Category 2 definition of homelessness; see “Referrals to Rapid Rehousing Programs with Category 2 Eligibility Criteria” below.
- 2) Referrals shall be made based on community prioritization standards (see section D. Prioritization), initial eligibility, and the following standards:
- a. Referrals shall be made based on preferences between available housing options that a participant appears to be eligible for.\* This information is collected during the process outlined in the above Dynamic Prioritization and Verified Contact Information standards.
    - i. Participants within each CE subpopulation shall be offered referrals starting with the highest prioritized participant in the given intervention range first and shall proceed participant-by-participant down the Active CES BNL if they have Verified Contact Information, and there are housing opportunities they appear to be eligible for\* and that they ranked as one of their choices.
    - ii. In the order described above, referrals for a given opportunity shall be sent for the participant who ranks that opportunity highest. Participants shall only receive one referral to a housing opportunity at a time.
  - b. Per each program opening, at CES Case Conference 1 primary referral shall be provided and, if the program chooses, 1 backup referral per opening.
    - i. If the pending referrals made at a previous CES Case Conference were found to be ineligible for CES (not meeting the homelessness eligibility, for example) or the participant refuses the referral, those referrals may be replaced by 1 corresponding additional referral, per referral, in between CES Case Conference. This procedure corresponds to a total of 4 referrals that may be possibly made per week per opening. These additional referrals shall be presented to the community at the following CES Case Conference, and retracted if for any reason they are not agreed upon as appropriate by the community present.





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- 6) The housing provider shall record all attempts to contact the participant when following up on a referral. Records of attempted contacts, contacts made and their disposition shall be recorded in the “Case Notes” of each participant’s HMIS CES Dashboard.
  
- 7) Once the housing provider has verified eligibility (see “section H. Eligibility Documentation Roles and Responsibilities”), they shall accept the referral in HMIS.
  - a. If the housing provider cannot verify eligibility, they shall follow the “Rejection of Referrals” policy and procedure below.

\*CES will not screen for eligibility criteria for Sonoma County Housing Authority, Santa Rosa Housing Authority, or income criteria for tax credit programs.