

OneHome Policies and Procedures

Approved by MDHI Board of Directors on January 11, 2018

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A. <u>PLANNING</u>

The 25 Cities/Zero 2016 effort was a key Federal strategy through which 25 communities received technical assistance and mobilized local planning efforts and partnerships to create an effective system for aligning housing and services interventions to end homelessness. Led by the U.S. Department of Veterans Affairs (VA), in partnership with the U.S. Department of Housing and Urban Development (HUD) and the U.S. Interagency Council on Homelessness (USICH), the aim of this effort was to assist 25 communities in accelerating and aligning their existing efforts toward the creation of coordinated assessment and entry systems, laying the foundation for ending all homelessness in these communities.

The Metro Denver 25 Cities Initiative was a Coordinated Entry pilot that was launched as Coordinated Assessment and Housing Placement System (CAHPS), during the summer of 2014 for the seven-county Metro Denver area. This initiative rebranded as OneHome in October 2016, and is guided by Federal HUD requirements on coordinated entry systems and delegated authority by the Metro Denver Homeless Initiative (MDHI) Continuum of Care (CoC) Board of Directors to operate coordinated entry across the region. OneHome operates as an integral component of the MDHI CoC strategy for establishing an effective homeless crisis response system, by establishing a common assessment tool for assessing individuals' housing needs, as well as a single system for matching participants to available housing resources. The common assessment tool is the Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT), which examines and scores a participant's vulnerability. Participants are then matched with housing opportunities according to CoC prioritization factors and the VI-SPDAT score.

OneHome uses available Federal guidance on coordinated entry in planning, including but not limited to:

CoC Program Interim Rule¹ Coordinated Entry Notice² Coordinated Entry Policy Brief³ ESG Program Interim Rule⁴ 2014 & 2016 Prioritization Notice⁵ HUD Coordinated Entry Core Elements⁶ Coordinated Entry Self-Assessment⁷

¹ https://www.hudexchange.info/resources/documents/CoCProgramInterimRule.pdf

² https://www.hudexchange.info/resources/documents/Notice-CPD-17-01-Establishing-Additional-Requirementsor-a-Continuum-of-Care-Centralized-or-Coordinated-Assessment-System.pdf

³ https://www.hudexchange.info/resources/documents/Coordinated-Entry-Policy-Brief.pdf

https://www.hudexchange.info/resources/documents/HEARTH_ESGInterimRule&ConPlanConformingAmendment s.pdf

⁵ https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf

⁶ https://www.hudexchange.info/resource/5340/coordinated-entry-core-elements/

⁷ https://www.hudexchange.info/resources/documents/coordinated-entry-self-assessment.pdf

Definitions & Stakeholders

Agency Liaison: a staff member at a OneHome Partner Agency who acts as a point person between agency staff and OneHome staff on issues of referral, process or general participant inquiries.

Common Assessment Tool: a standardized assessment tool used to determine a household's current housing situation, housing and service needs, risk of harm, risk of future or continued homelessness or other adverse outcomes. OneHome utilizes the VI-SPDAT as the standardized assessment tool.

Community Design Team: the original planning body for coordinated entry during the launch in 2014 that met weekly. Currently meets bi-monthly and is open to anyone interested in providing feedback and designing the OneHome system. Monthly meetings are posted at <u>www.onehomeco.org/calendar</u>.

Coordinated Entry System: per CoC Program interim rule at 24CFR 578.3, HUD requires each CoC to establish and operate "a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool." The OneHome system focuses on housing services and does not currently coordinate emergency services such as shelter.

Decentralized Access: OneHome is in the process of designing a coordinated entry system that is decentralized for housing access. This 'no wrong door' approach means that a homeless family or individual can present at any homeless housing or service provider in the Metro Denver region but is assessed using the same tool and methodology so that referrals are consistently completed across the CoC.

Diversion: creative conversations and interventions designed to offer participants an alternative to the homeless crisis response system through connection to mainstream services and participant-driven strengths-based opportunities for stable housing.

Households: any configuration of persons in crisis whatever their age or number (adults, youth, or children; singles or couples, with or without children).

MDHI CoC Board of Directors: the governing body of the Metro Denver Homeless Initiative Continuum of Care that delegates authority to OneHome to operate as the coordinated entry system. Board members are elected to four-year terms and convene monthly. The Board is made up of community providers, leaders involved in homelessness and persons with lived experience. The public is invited to attend MDHI Board Meetings, the details of which are posted at www.mdhi.org.

Mobile Assessor: a trained OneHome staff member that can dispatch across the community to assess participants using a VI-SPDAT where there are gaps in access.

OneHome Partner Agency: an agency that has agreed to participate in OneHome and that has signed a Partner Agreement to define the roles of said agency and OneHome responsibilities. Every agency that acts as a referral source, participates in housing navigation, provides housing or is otherwise engaged in the OneHome system should complete a Partner Agreement.

OneHome Team: the interagency body of staff dedicated to the operations, design and implementation of the OneHome system. Information of the team is available at www.onehomeco.org/aboutus.

Participants: people in a current or previous housing crisis who are accessing or being assessed by coordinated entry.

Person With Lived Experience: person who is currently experiencing homelessness or has experienced homelessness in their lifetime.

Population Groups: specific sub-population groups of providers and persons with lived experience in order to address the nuanced needs of unaccompanied youth, families, survivors of domestic violence, and Veterans. Sub-population monthly meetings are posted at www.onehomeco.org/calendar.

Prioritization: helps the CoC manage inventory of community housing projects, ensuring that those persons with the greatest need and vulnerability receive the supports they need to resolve their housing crisis.

Projects: housing or supportive services intended to help a participant to rapidly exit homelessness.

Recipients: organizations that serve program participants in projects funded by CoC Program or ESG Program grants, including sub-grantees.

Regional Access Point: a location where a participant can access OneHome resources, including diversion or a VI-SPDAT. These points vary from homeless service providers to locations where homeless populations access resources frequently, including but not limited to libraries, day resource centers and shelters.

RGC Representatives: acts as the body responsible for ensuring OneHome meets the needs of the MDHI community and reports to the MDHI Board on elements related to CoC compliance with HUD regulations on coordinated entry. The Regional Governing Council (RGC) is made up of a diverse range of community providers, MDHI Board Members, and persons with lived experience as voting members. Additionally, staff affiliated with OneHome serve on the RGC in a non-voting role. RGC representatives serve two-year terms, and represent sub-populations and sub-regions as well as voices of lived experience: Denver, Boulder/Broomfield, Jefferson/Douglas, and Adams/Arapahoe. The public is invited to attend RGC Meetings, the details of which are posted at www.onehomeco.org/governance.

Stakeholders: any participant, person with lived experience, staff member of any institution, or general public that resides within the Metro Denver CoC vicinity who is interested in OneHome.

VI-SPDAT: Vulnerability Index – Service Prioritization Decision Assistance Tool, the common assessment tool adopted by the CoC to assess housing and service needs for individuals. F-VI-SPDAT is for Families and TAY-VI-SPDAT is for Transition Age Youth.

B. <u>ACCESS:</u> the engagement point for persons experiencing a housing crisis

Discrimination

OneHome works to create an inclusive system that is available to all eligible persons regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, or marital status.

OneHome ensures all people in the CoC's geographic area, including different populations and subpopulations such as people experiencing chronic homelessness, Veterans, families with children, youth, and survivors of domestic violence, have fair and equal access to the coordinated entry process.

Participants will be informed of the ability to file a discrimination complaint or grievance in the release of information, which is signed prior to a VI-SPDAT assessment, and on the OneHome website. OneHome is working to combine notices of OneHome rights and grievance procedures with existing HMIS Rights and Grievance procedures posted at most agencies.

If a participant feels that they have been the target of discrimination by a provider or have a complaint about the OneHome System, including referral, access or assessment, they are encouraged to file a grievance. Discrimination complaints or grievances must be submitted via email to <u>contact@onehomeco.org</u> or in writing to Metro Denver Homeless Initiative, 711 Park Ave West, Suite 320, Denver, CO 80205. The OneHome Program Manager will respond within three business days in writing to all complaints or grievances. If the party filing the grievance is not satisfied with the OneHome Program Manager's response, their complaint will be brought to the Regional Governing Council and then the MDHI Board of Directors. The MDHI Board of Directors will act as the final decision body for all nondiscrimination complaints.

Inclusivity

Each county within MDHI has a variety of access points available to anyone experiencing homelessness within the CoC. Further clarification of availability of defined OneHome access points is in progress. Referrals are not limited to the county in which the household seeks services and/or is assessed; instead, a participant could be referred, if they desire, to an available program that will meet their needs anywhere within the CoC's geographic area.

All locations acting as access points for OneHome should be ADA-accessible, and if not, have accommodations for alternative manners of assisting participants with disabilities to take a coordinated assessment. All recipients of HUD funding must provide appropriate auxiliary aids and services necessary to ensure effective communication (e.g. Braille, audio, large type,

assistive listening devices and sign language interpreters). The use of OneHome Flex Funds for purposes related to auxiliary aids is an allowable expense.

OneHome will make every effort to ensure that documents and systems are culturally and linguistically appropriate for participants. OneHome is translating documents into multiple languages to meet the needs of minority, ethnic, and groups with Limited English Proficiency (LEP). The use of MDHI Flex Funds for purposes related to translation is an allowable expense.

Street Outreach

Households that are residing in unsheltered locations have access to OneHome either through presenting at a defined access point or through street outreach.

Street outreach providers working with OneHome should utilize progressive engagement in a person-centered manner. This may mean that the participant is assessed right away, or over time as rapport is developed.

OneHome is working with street outreach leadership across the CoC to create maps of street outreach coverage and gaps to enhance coordinated street outreach delivery in communities with limited supports.

Emergency Services

Emergency services including all domestic violence and emergency shelters that are not funded with CoC or ESG funded resources are not coordinated by OneHome. All emergency shelter or services that receive funding through ESG or are participating in OneHome will be required to operate in a low-barrier manner. OneHome and MDHI is working to collaborate with other emergency shelters to help align them with lower barrier models of service. Participants should be able to access emergency services independent of the operating hours of OneHome's intake and assessment process.

Domestic Violence

OneHome works with programs serving survivors of domestic violence to design a system that is survivor-friendly. Participants may not be denied access to OneHome on the basis that he or she has been a victim of domestic violence, dating violence, sexual assault or stalking.

OneHome makes every effort to ensure survivors of domestic violence have access to the coordinated entry system and that safety planning is a component of the screening. OneHome seeks to address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim specific providers. People fleeing or attempting to flee domestic violence and victims of trafficking have safe and confidential access to the OneHome process and victim services, including access to the comparable process used by victim service providers, as applicable, and immediate access to emergency services such as domestic violence hotlines and shelter.

OneHome is currently working on an alternate database for victim service providers that will allow for access to coordinated entry resources without personally identifiable information

accessible from community providers. Victim service providers funded by CoC and ESG program funds are not required to use the CoC's coordinated entry process, but CoC and ESG-funded victim service providers are allowed to do so.

If a participant is identified as needing safety planning to mitigate harm to themselves or family members, the participant or person working with them should immediately call 2-1-1 for domestic violence crisis resources. If the call needs to be made outside of 2-1-1 operating hours, then call 1-800-799-SAFE to be connected with the most proximate, appropriate and available emergency shelter.

Participants can access emergency services, such as emergency shelter, independent of the operating hours of OneHome's intake and assessment processes. Victim service providers receive training on conducting the VI-SPDAT in-house so that participants fleeing domestic violence do not have to access external agencies or risk their safety in order to access the coordinated entry system.

C. <u>ASSESSMENT:</u> a progressive approach to determine a household's housing needs, preferences and vulnerability.

OneHome utilizes the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) as the coordinated assessment tool for the MDHI Continuum of Care. Variations for sub-populations, including the Family VI-SPDAT (F-VI-SPDAT) and Transition Age Youth VI-SPDAT (TAY-VI-SPDAT) complement the VI-SPDAT for individuals. Questions on the VI-SPDAT will be limited to those fields that ultimately impact a person's ability to become rapidly housed. Data fields for research or data-gathering purposes will be redirected to be included on other surveys in the community, such as the Point in Time or HMIS intake. The assessment and prioritization approach is locally specific reflecting characteristics and attributes of participants and CoC priorities, in alignment with HUD priorities.

The VI-SPDAT is administered across all counties in the CoC by assessors at variety of access points. OneHome is working to define the access point hours of availability, including for off-hours needs, across each community to publicize for participants seeking an assessment. This would include OneHome 2-1-1 Mobile Assessors, who are not the only way that participants access the coordinated assessment.

The VI-SPDAT should be administered as part of a phased assessment, once diversion or creative conversations around housing resolution are held with the participant and no other housing opportunities have been identified. Regardless of eligibility for OneHome, participants seeking services should be connected with mainstream and community-based emergency assistance services immediately.

Defined access points and the related hours of availability will be made public on the OneHome website and marketing materials will be created to promote OneHome at locations frequented by persons experiencing homelessness regardless of sub-population. These marketing materials will be disseminated to area law enforcement, places of worship and disability advocacy groups,

among others, to promote access for all eligible participants. OneHome will work to enhance referrals from 2-1-1 and SEO (search engine optimization) referrals. OneHome will prioritize making all access points in proximity to public transportation or locally utilized community resource hubs. OneHome 2-1-1 Mobile Assessors are able to connect to participants unable to physically arrive to an access point.

For persons experiencing literal homelessness seeking shelter or resources for the first time, the VI-SPDAT will be administered no sooner than two weeks upon initial contact. Assessors should first try to divert the person to a stable housing situation or help the person self-resolve. Access points refer eligible participants to HUD 811/202 properties, TANF, AND, SNAP, OAP, and related locally applicable mainstream benefits.

For persons experiencing literal street homelessness or those in extreme safety cases, street outreach workers may administer the VI-SPDAT at any time.

Domestic violence safety planning and trauma-informed care are a required component of any OneHome VI-SPDAT training, with special consideration and application of trauma-informed assessment techniques afforded to survivors of domestic violence or sexual assault to help reduce the chance of re-traumatization.

D. <u>PRIORITIZATION</u>: helps the CoC manage inventory of community housing projects, ensuring that those persons with the greatest need and vulnerability receive the supports they need to resolve their housing crisis.

Prioritization occurs at the CoC level and not county by county.

As part of the strategy to match resources to the most vulnerable in the community, the Alternate Process provides an opportunity to prioritize households that are unable to complete an assessment or for whom the assessment does not adequately capture the severity of their vulnerability. Although access to housing and services through OneHome is generally dependent upon the completion of an assessment, persons who are unable to or who refuse to complete the assessment could be considered for an alternate placement process described at <u>www.onehomeco.org/alternate-process</u>.

Prioritization Process

The purpose of OneHome is to allocate housing and service resources as effectively as possible in a manner that is easily accessible. Assistance is prioritized based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. OneHome does not prioritize based on severity of need for interventions such as emergency shelter or domestic violence shelters allowing for an immediate crisis response. OneHome and MDHI are currently prioritizing based on the following criteria, but are considering other strategies based on community data and best practices. The changes will be proposed at OneHome Regional Governing Council and Community Design Team for feedback.

OneHome prioritizes most permanent supportive housing (PSH) first for chronically homeless households. As the OneHome portfolio of projects and recipients expands, DedicatedPlus and non-CoC funded PSH will be able to serve households that are not yet chronically homeless or who do not have necessary documentation.

The following procedures are for individuals, and will change after the community-wide rollout of the Salesforce database in early 2018.

Procedures:

- 1. The Pre-Match Queue is made up of the **top 5** individuals from each score group (with one exception) who have been scored according to the match priorities:
 - a. For the 15+ Score Group, ALL individuals who fall within that score range are moved into the Pre-Match Queue
 - b. Additional score groups defined: 10, 11, 12, 13, 14
 - c. In addition to the VI-SPDAT score, the following match priorities are considered: i. Has been homeless 3 years (36 months) or more
 - ii. Tri-Morbidity indicated on the VI-SPDAT
 - iii. Age (participants are sorted oldest to youngest, with older participants given priority)

NOTE: Eligible veterans will be referred to veteran housing resources; non-eligible veterans will be included in this pre-match and match process.

- 2. As people exit, individuals identified using the above priority schemes are moved into the Pre-Match Queue
- 3. When an individual enters the Pre-Match Queue, an email is sent to the Housing Navigator identified on the Match Initiation Form (MIF)
 - a. In the event that a person has no MIF, the email is sent to the person who conducted the assessment
 - b. In the event that a person has no Housing Navigator, then the agency must indicate what level of assistance they can provide. All efforts will be made to engage necessary resources through OneHome navigation
- 4. The Pre-Match email initiates the document tracking period
 - a. Document collections are tracked by the OneHome coordinator
 - b. The OneHome data team has access to the spreadsheet to monitor progress
 - c. The link is contained in the pre-match email
 - d. If there are no updates for 3 months, a person is flagged for more intensive follow-up
 - e. If a person is on the Pre-Match Queue for 90 days and cannot be located despite our efforts, they are deemed inactive

- 5. Once a person is identified as document-ready, they are eligible to be matched to housing resources. Document readiness may include documents such as birth certificate, state-issued ID, social security card, verification of income, verification of chronic homelessness, verification of disability.
- 6. Moving forward with housing matches
 - a. Potential matches are to be identified from each score equally
 - b. If there are no document-ready participants, then the next score is considered
 - c. If there are no document-ready participants under any score, use procedure 5c above
 - d. The distribution of matched scores will be monitored and equalized over time

Current Prioritization Criteria by Population, beyond coordinated assessment score

Individuals

- 1- Length of time homeless (36 months or more)
- 2- Tri-morbidity
- 3- Age (oldest to youngest)

Families

- 1 Length of time homeless (25+ months homeless)
- 2 Chronic homeless status
- 3 Unsheltered
- 4 Age of the youngest child

Youth

- 1- Co-occurring mental health and substance abuse issues;
- 2- Age (youngest to oldest);
- 3- Length of time homeless
- 4- Risk of exploitation

Inactive Status

A household who is inactive for 90 days without communication is deemed inactive in the Pre-Match Queue. Providers must offer and document three attempts to outreach that household in order to connect them to OneHome. Any inactive household that reconnects with a provider at any time will not lose their place on the Pre-Match Queue, but be immediately placed back on it for a match to housing as long as their circumstances have not changed related to their prioritization.

The eligibility requirements for a program housing resource may be different than the prioritization of persons in coordinated entry. For example, a program targeted to serve persons living with HIV+/AIDS requires that as a component of eligibility, but OneHome would not create a priority category as needing to have an HIV+/AIDS status across the whole system.

E. <u>REFERRAL</u>: the connection of households to available CoC housing resources and services in accordance with the CoC's documented prioritization guidelines.

All CoC grantee and ESG grantees are required to fill 100% of vacancies through OneHome referrals. In addition, providers outside the CoC funding stream are encouraged to use OneHome to identify candidates for housing vacancies. The Partner Agreement between OneHome and CoC grantees or other providers reviews the roles and expectations of both parties. Eligibility criteria for all OneHome programs is to be made publicly available and include allowable entry requirements by project on <u>www.onehomeco.org/assets</u>

Participant Initiated Rejection

Participants have the right to reject housing and services for which they are eligible without affecting their prioritization status and OneHome will explore alternative service strategies and identify new referrals as they come available to the person.

Project Admission

MDHI will ensure that applicants entering through OneHome shall not be denied admission to housing, nor will any family members be separated from other members of their family, based on age, sex, gender, gender identity, or sexual orientation, marital status or disability when entering housing. Projects must follow Housing First best practices. Denials by the housing provider may not exceed 15% of total OneHome referrals in the course of a grant year. All denials must be formally documented using the <u>Housing Denial Form</u>, of which referred parties and their advocates will receive a copy. Projects may not deny participants for reasons that are not listed in their eligibility.

Project Termination and Transfer

Working with housing and service providers, a household that is placed into a unit through OneHome will have access to services to keep them housed. Projects should make every available attempt to help support participants to retain their housing. Whenever possible, eviction back into homelessness is avoided. In the event that the household loses or has the potential to lose housing, alternatives should be explored to mitigate the amount of time that person would become homeless again. In the event that a participant's housing may be lost, projects should retain the participant in their program, even if the tenancy has exited the unit. This allows for the participant to be transferred to another unit or another project that may suit their needs. Projects should only terminate participants from program enrollment as a last resort, as the person's eligibility for alternative CoC or ESG resources may be negatively impacted.

A household that ultimately loses housing obtained through OneHome will be reprioritized if they held that housing for less than 90 days. For households that have been housed longer than 90 days, they will need to re-enter the OneHome system as a new participant and meet all program eligibility in order to be matched.

Educational Assurances

All CoC and ESG recipients are required to ensure that homeless individuals and families who

become homeless are informed of their eligibility for and receive access to educational services.

Expectations for Continuum of Care PSH/RRH Programs

In order to meet HUD's Continuum of Care (CoC) Notice of Funding Availability (NOFA) grant requirements on turnover units and vouchers each time a CoC-funded permanent supportive housing (PSH) or rapid rehousing (RRH) project has an opening, housing providers should submit their vacancies via the link on <u>www.onehomeco.org/assets</u>

What Happens Next

The vacancy will be added to the OneHome database, which will match the vacancy with high needs individuals from the seven-county Metro Denver area who meet the project's criteria. This will culminate in communications between the housing providers, the potential participant and the person helping that participant (Housing Navigator) to make a final determination on whether this will be a good fit.

Assessing High-Need Individuals on Your PSH Project Wait List

In the past, many of the CoC-funded PSH projects maintained waitlists. It is strongly recommended that PSH projects administer the VI-SPDAT pre-screening tool for those most in need on a wait-list. Once a surveyor has completed and submitted the VI-SPDAT, it will relay the information to the OneHome platform.

OneHome will operate using a Housing First orientation that does not screen people out of the coordinated entry process due to perceived barriers to housing or services, including, but not limited to, too little or no income, active or a history of substance abuse, domestic violence history, resistance to receiving services, the type or extent of a disability-related services or supports that are needed, history of evictions or poor credit, lease violations or history of not being a leaseholder, or criminal record.

Assessors submitting a VI-SPDAT for a survivor should use the masked process of submitting information into the OneHome database by identifying the person via their agency case number, (ex. 'DV-Case 123') instead of their name, and do not need to complete the social security number field. If that survivor is identified as a priority for housing, OneHome will contact the referring DV advocate and connect them with the housing option. The DV advocate can then directly connect with the survivor and the housing option without OneHome ever knowing the specific identification of the survivor.

Emergency Solutions Grant

Recipients of ESG will be expected to follow policies of OneHome to prioritize resources through OneHome. The OneHome Policy & Procedure manual will be updated on a semi-annual basis and updated changes, including those related to ESG, will be incorporated in future iterations.

ESG-program recipients and sub-recipients are required to use OneHome as the only referral source from which to consider filling vacancies in housing and/or services funded by CoC and ESG programs, per the ESG interim rule, 24 CFR 576.400(e). Currently, ESG projects in MDHI administer prevention and rapid re-housing assistance, but not permanent supportive housing or transitional housing assistance.

Prevention

Currently, OneHome is not designed for access by persons seeking homelessness prevention services. There are funds available in Metro Denver at projects for homeless prevention activities.

Access points will be trained in referral to existing homeless prevention services for those persons who present as at-risk at an access point seeking services not provided by OneHome.

The CoC is convening a Prevention Affinity Group to help coordinate non-CoC funded homeless prevention resources.

F. DATA MANAGEMENT

OneHome does not use data collected as part of the assessment process to discriminate or prioritize households for housing and services on a protected basis, such as race, color, religion, national origin, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity or marital status.

Assessment

Before being assessed with the coordinated assessment tool, consent is determined by the execution of the OneHome Release of Information (ROI) form. The purpose of this release is to facilitate referrals for housing, treatment, case management, treatment planning, coordination of medical care, and other services. By signing, the participant agrees that his or her coordinated assessment responses can be exchanged among the organizations that participate in OneHome. Participants may refuse any question on the coordinated assessment tool but the refusal of some questions may affect the ability of the OneHome assessor to accurately assess their housing and service needs.

The full ROI, which is available at <u>www.onehomeco.org</u> must be uploaded within 48 hours of completing a VI-SPDAT. Any changes to OneHome forms or the Release of Information will need to be presented to the MDHI stakeholders for feedback at least 2 weeks prior to implementation.

Referral

Specific diagnosis or disability information may only be obtained for purposes of determining program eligibility to make appropriate referrals such as a project that only serves persons with HIV/AIDS.

Participant consent is required to share and store their information for purposes of assessing and referral through the OneHome coordinated entry process. MDHI prohibits denying services to participants if the participant refuses to allow their data to be shared unless Federal statute requires collection, use, storage, and reporting of a participant's personally identifiable information (PII) as a condition of program condition.

For data that is stored or connected with the Homeless Management Information System (HMIS), MDHI ensures all users of HMIS are informed and understand the privacy rules associated with the collection, management and reporting of participant data.

For the pre-match queue prioritized list, HMIS data privacy and security protections prescribed by HUD for HMIS practices in the HMIS Data and Technical Standards will act as the standard.

Training

All staff with participant-level access to the OneHome database will be trained on protection of all data collected through the system prior to gaining access to the system. Participant-level data should always be transmitted via fax or encrypted email to protect personally identifiable information (PII).

G. EVALUATION

Regional Governing Council

OneHome is guided by Federal HUD requirements on coordinated entry systems and delegated authority by the MDHI CoC to operate coordinated entry across the region. The OneHome Regional Governing Council (RGC) acts as the body responsible for ensuring OneHome meets the needs of the MDHI community and reports to the MDHI Board on elements related to CoC compliance with HUD regulations on coordinated entry. The RGC is made up of a diverse range of community providers, MDHI Board Members, and persons with lived experience as voting members. Additionally, staff affiliated with OneHome serve on the RGC in a non-voting role.

RGC representatives serve two-year terms, and represent sub-populations and sub-regions as well as voices of lived experience: Denver, Boulder/Broomfield, Jefferson/Douglas, and Adams/Arapahoe.

RGC representatives are elected by application when a vacancy is identified. Notification of a vacancy and application availability should be made public through newsletter or community announcements so eligible candidates can apply.

Policy and Procedure Updates

The OneHome Policies and Procedures manual will be updated on at least a semi-annual basis, reviewed by the community of OneHome stakeholders and RGC prior to approval by the MDHI Board of Directors. OneHome stakeholders will be notified via the MDHI e-news and posting on the OneHomeCO.org website of proposed changes, and will be given at least two weeks to review and provide feedback prior to approval by the MDHI Board of Directors. The final version approved by the MDHI Board of Directors will be posted on the www.OneHomeCO.org website. Changes may occur between policy updates and some HUD-specific elements are still underway.

The CoC's Board of Directors is undergoing a review of a more robust monitoring process for access points and funded housing providers to ensure they have policies and procedures aligning with Federal nondiscrimination and civil rights laws, as well as ADA accessibility. This will be

reviewed routinely to ensure accessibility to all persons, including those with disabilities and those with perceived barriers to housing or services.

Training

OneHome will offer training for community providers at least twice annually on the OneHome system. Agency Liaisons will be able to train staff at their agency outside of the trainings taught by OneHome, provided they follow the curriculum provided by OneHome. Capacity building trainings will be free and frequent based on resources and community need throughout the year.

OneHome training will cover, at a minimum, the following topics:

- Coordinated entry system process, policies and procedures
- Definition of chronic homelessness
- Who to assess and where, including safety and confidential physical environments
- Releases of information, confidentiality & privacy
- Messaging and scripting
- How to administer the VI-SPDAT versions for Individuals, Youth and Families
- Domestic violence and safety planning
- Overview of the OneHome website
- Processes and procedures for submitting a VI-SPDAT
- Uniform-decision making process across all access points and staff
- Alternate Process for persons unable to complete a VI-SPDAT or for whom the VI-SPDAT fidelity would be compromised

Feedback

OneHome feedback solicitation includes quality and effectiveness of the entire coordinated entry system from Partner Agencies, Housing Providers and Persons with Lived Experience. OneHome ensures adequate privacy protections of all participant information collected in the course of annual OneHome evaluation.

OneHome seeks to include people with current or previous lived experience related to homelessness on various committees, including the Regional Governing Council, to assist with leadership and decision-making.

The Regional Governing Council will receive the results of all compiled feedback for review.

OneHome makes data and outcomes available publicly through dashboards on the OneHome website, <u>www.onehomeco.org</u> and uses data to inform decision-making.

OneHome gathers Partner Agency and Stakeholder feedback through an anonymous survey, distributed at least annually, and an in-person convening focusing on evaluation occurring at least annually. The compiled Partner Agency & Stakeholder feedback is provided to the OneHome Regional Governing Council for review.

OneHome gathers Lived Experience feedback at least quarterly by implementing a town hallstyle event in each of the four sub-regions within the CoC: Denver, Jefferson/Douglas, Adams/Arapahoe, Boulder/Broomfield. The town-hall events will review OneHome and coordinated entry and should be targeted to people who have been housed through the system, those surveyed and those not surveyed or connected with the system. Every effort should be made to advertise the event in advance via street outreach and at emergency shelters, day centers, libraries, or other locations frequented by people experiencing homelessness. The compiled Lived Experience feedback is provided to the OneHome Regional Governing Council for review.

OneHome gathers feedback from people housed through the OneHome system through the Lead Agencies, that can conduct individual surveys and interviews with persons housed at any housing project in the OneHome portfolio. Lead Agencies will not conduct surveys or interviews with housing projects that are within their own institution.

Marketing

All programs that receive CoC Program or ESG program funding, and OneHome Participating Programs must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws as specified at 24 CFR 5.105(a), including the following:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status.
- Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance.
- Title VI 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.

• Title II of the Americans with Disabilities Act prohibits public entities, which includes State and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing related services such as housing search and referral assistance.

• Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.