

# CONTINUUM OF CARE Policies & Procedures

This document contains the Continuum of Care (CoC) policies that guide and inform the services provided to those experiencing homelessness in Washtenaw County. The most current version of this and all CoC policies and procedures can be found at [www.ewashtenaw.org/coc](http://www.ewashtenaw.org/coc).

2017

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## I. OVERVIEW

### A. CONTINUUM OF CARE

The Washtenaw County [Continuum of Care \(CoC\)](#)<sup>i</sup> coordinates the community's policies, strategies, and activities toward ending homelessness. CoC membership is constituted by any agency, organization, entity, or individual interested in ending homelessness in our community. In this way, we ensure broad engagement and representation from the many systems of care that homelessness touches. The CoC's work includes gathering and analyzing information to determine the local needs of people experiencing homelessness, implementing strategic responses, educating the community on homelessness issues, providing advice and input on the operations of homeless services, measuring CoC performance, and providing coordinated oversight to [Emergency Solutions Grant \(ESG\)](#)<sup>ii</sup> and CoC grant recipients, both of which provide homelessness and housing programs in Washtenaw County.

CoC information and documents can be accessed at by [clicking here](#)<sup>iii</sup>.

For any questions or comments on the Washtenaw County CoC policies and procedures, visit [www.ewashtenaw.org/coc](http://www.ewashtenaw.org/coc) or contact Laura Urteaga-Fuentes at [urteagal@ewashtenaw.org](mailto:urteagal@ewashtenaw.org) or 734.544.3052.

### B. GOVERNING BODY & COMMITTEES

The Washtenaw County CoC is governed by a Board, the decision-making body of the CoC. The Board provides the CoC with the guidance and influence needed to effectively implement policies, strategies, and activities toward ending homelessness. Board membership includes formerly homeless individuals, organizations that address homelessness, local businesses, government, law enforcement, and public housing agencies. Furthermore, the CoC abides by a [Governance Charter](#)<sup>iv</sup>, approved by the CoC each year.

The CoC Board appoints various committees to engage in the CoC work and make recommendations to the Board. These committees consist of:

**CoC BOARD EXECUTIVE COMMITTEE:** The CoC Board has two chairpersons and a secretary, voted into leadership by the CoC Board. Co-chairs and secretary serve one-year terms.

**FUNDING REVIEW TEAM (FRT):** The FRT reviews program outcomes, compliance, and data quality in order to make funding recommendations to the CoC Board for the CoC and ESG annual funding competitions.

**DATA & PERFORMANCE MEASUREMENT COMMITTEE (DPMC):** The DPMC seeks to ensure local compliance with HUD Homelessness Management Information System (HMIS) data standards, improve agency and community-wide data quality, as well as use HMIS data to inform CoC program/system design and measure progress on community goals and plans to end homelessness.

**COORDINATED ENTRY OVERSIGHT & EVALUATION COMMITTEE:** This committee's responsibility is to monitor the implementation and effectiveness of the county's centralized intake, Housing Access of Washtenaw County (HAWC). The committee reviews customer service evaluation results, agency provider survey results, HAWC policies and procedures, and marketing materials in order to make program improvement recommendations.

**COMMUNITY HOUSING PRIORITIZATION (CHP) COMMITTEE:** The Community Housing Prioritization (CHP) Committee is responsible for overseeing the centralized referrals process for Rapid Re-Housing (RRH) and Permanent Supportive Housing (PSH) programs. As per the CoC community application to HUD, the Washtenaw County CoC is committed to prioritizing chronically homeless individuals and families as defined by [HUD's category 1 Homeless definition](#)<sup>v</sup> which is defined as, "an individual or family who lacks a fixed, regular, and adequate nighttime residence."

Committee members include both those who provide housing services to those experiencing homelessness and those who have housing stock, including: HAWC, shelter/RRH/PSH providers, Public Housing Authorities, Veterans Administration, and PORT/PATH (community mental health).

**WASHTENAW HOUSING ALLIANCE OPERATIONS COMMITTEE:** This committee is comprised of executive leadership of each Washtenaw Housing Alliance (WHA) member-agency. The WHA Operations Committee (OC) member-agencies are non-profit and government entities that provide housing or services to people who are homeless or at-risk of homelessness in Washtenaw County. The WHA OC is responsible for informing and implementing the community's Blueprint to End Homelessness, as part of the WHA. The OC meets bi-monthly to discuss progress in achieving community goals, emerging barriers or issues in homeless services, Coordinated Funding, and the OC meetings provide an opportunity for professional development, resource/information sharing, and networking.

## II. COORDINATED ENTRY: HOUSING ACCESS FOR WASHTENAW COUNTY (HAWC)

Washtenaw County CoC has operated a coordinated entry since 2011 called Housing Access for Washtenaw County (HAWC). HAWC and its partners are committed to working together to utilize scarce housing and homeless resources in the most targeted and efficient manner possible.

HAWC is largely funded by the Michigan State Housing Development Authority (MSHDA), and is a mandate of the ESG funding they provide Washtenaw County. While HAWC is operated by the Salvation Army of Washtenaw County, it follows a community process that involves partner agencies. To better serve the community, HAWC's customer service and service provision is monitored closely. Evaluations are conducted on a regular basis as overseen by the Coordinated Entry Oversight and Evaluation Committee, and focus on client satisfaction, relationships with community partners, and staff effectiveness and fidelity to policies and procedures. These evaluation findings are used by the committee to make HAWC recommendations for the consideration of the CoC Board. Reports that highlight findings are shared with the CoC at-large.

HAWC also administers financial assistance dollars for prevention and RRH. HAWC's role is listed in further detail in the Memorandum of Understanding in attachment A.

As mentioned above, the CHP Committee is responsible for overseeing the centralized referrals process for RRH and PSH resources. CHP Policies and Procedures can be viewed in Attachment B. A flowchart of the HAWC and CHP process is shown in Attachment C. Moreover, a document detailing frequently asked questions (FAQs) related to the CHP process is available at [www.ewashtenaw.org/coc](http://www.ewashtenaw.org/coc).

## III. COC PARTNER COMMITMENTS

The CoC and its service providers understand that coordinated entry and prioritization requires community buy-in and consistency across all CoC partners. Partners include shelters, Rapid Re-Housing (RRH) and Permanent Supportive Housing (PSH) providers, and other partners, such as the Veterans Administration and Public Housing Authorities. A list of specific partners is shown in the flowchart (Attachment C).

In an effort to align partner agency services with best practices, the CoC has committed to supporting and funding programs that utilize the following processes:

- **Coordinated Entry**- All partners commit to access and deliver housing and homelessness services through the coordinated entry system.
- **Housing First** – All partners, including HAWC and other housing providers agree to the principle of [Housing First](#)<sup>vi</sup>. HUD defines Housing First as “[a program that] offers individuals and families experiencing homelessness immediate access to permanent affordable or supportive housing, without clinical prerequisites like completion of a course of treatment or evidence of sobriety and with a low-threshold for entry”
- **Shelter Diversion** – All partners commit to the goal of shortening shelter stays by utilizing the Housing First approach and by diverting from shelter whenever possible and safe for the client.
- **Rapid Re-Housing**- All partners agree to embrace rapid re-housing programming administered utilizing [national best practices](#)<sup>vii</sup>.

- **HMIS-** All partners commit to real-time HMIS data entry, except those agencies that are exempt, such as domestic violence shelters. Further, all partners agree to routinely review and correct HMIS data quality issues and monitor outcome performance.
- **Community Housing Prioritization-** Partners agree that all clients with housing needs begin with HAWC and then are referred to the appropriate housing resources based on acuity and vulnerability in accordance with [HUD Notice CPD-16-11: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons](#) and with [HUD Notice CPD-17-01: Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System](#). All unit placements are completed through the Community Housing Prioritization Process, detailed in attachment B.
- **Staff training:** All community partners agree to attend shared trainings and community meetings.

## IV. OVERARCHING POLICIES & PROCEDURES

To comply with funding regulations, each agency must follow the regulations provided by HUD and/or MSHDA, depending on the agency's funding source. This includes, but is not limited to, mandatory documentation, program eligibility, grant administration, reporting requirements, and match/leverage requirements. Links to regulations are as follows:

[Continuum of Care \(HUD\)](#)<sup>viii</sup>

[Emergency Solutions Grant \(HUD\)](#)<sup>ix</sup>

[Emergency Solutions Grant \(MSHDA\)](#)<sup>x</sup>

In order to best meet the needs of the community and to comply with the above regulations, the following policies and procedures have been established to ensure consistent practices across the CoC. In addition, an FAQ document for HUD CoC recipients and sub recipients can be accessed at [www.housingaccess.net](http://www.housingaccess.net). This document helps to address frequently asked questions and details responses as they are implemented within the CoC.

### 1. PERSONS WITH LIMITED ENGLISH PROFICIENCY

The CoC and partner agencies will take reasonable steps to ensure meaningful access to their programs and activities for persons who are limited in their English proficiency, regardless of national origin. Such steps may include translating marketing materials and documents essential to providing services into languages prevalent in the community, as well as providing language assistance while providing services, including oral and written translation where appropriate.

To determine the level of need in Washtenaw County among persons with limited English proficiency, the CoC will conduct a four-factor analysis and develop a Language Access Plan, in accordance with HUD guidance established in the [Final Guidance to Federal Financial Assistance Requirements Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons](#). The CoC will make the analysis and plan available to partner agencies. CoC- and ESG-funded partners must comply with the CoC Language Access Plan or develop their own plan as specified in the guidance.

### 2. PREVENTING FAMILY SEPARATION

Families experiencing homelessness should not be separated when receiving services unless the health and well-being of children are at immediate risk. The age and gender of a child under the age of 18 shall not be used as a basis for denying a family's admission to any housing services. In addition, a broad definition of family must be used that allows for single parent households of any gender identity, two parent households including same sex parents and LGBT parents, and extended families to be served together with their children.

Furthermore, in compliance with HUD's Equal Access in Accordance with Gender Identity Rule, all households that present as a family must be served together as a family, whether that family includes adults and

children, or just adults, and regardless of the age, disability, marital status, actual or perceived sexual orientation, or gender identity of any member of the family.

### 3. EDUCATION

The educational needs of children and youth must be accounted for, to the maximum extent practicable, and families with children and unaccompanied youth must be placed as close as possible to the school of origin so as not to disrupt the children's education. Projects that serve homeless families with children and/or unaccompanied youth must have policies and practices in place that are consistent with the laws related to providing education services to children and youth. These recipients must have a designated staff person to ensure that children and youth are enrolled in school and receive education services. Homeless families with children and unaccompanied youth must be informed of their eligibility for McKinney-Vento education services and other available resources. Recipients shall maintain documentation in the participant's case file to demonstrate that these requirements have been met and that applicants and participants understand their rights.

### 4. EQUAL ACCESS AND NON-DISCRIMINATION

All services coordinated through the Continuum of Care must be available to all eligible persons, regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, marital status, height, or weight. The CoC and its partners will take all necessary steps to ensure that housing and services are administered in accordance with all applicable Federal and State civil rights laws, including, but not limited to:

- Fair Housing Act, a Federal law which prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status.
- Section 504 of the Rehabilitation Act, a Federal law which prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance.
- Title VI of the Civil Rights Act, which prohibits discrimination on the basis of race, color, or national origin under any program receiving Federal financial assistance.
- Title II of the Americans with Disabilities Act, which prohibits public entities, which including State and local governments, 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, which 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.
- HUD's Equal Access in Accordance with Gender Identity Rule, which prohibits discrimination based on sexual orientation, gender identity, and marital status.
- Michigan's Elliott-Larsen Civil Rights Act, which prohibits discrimination based upon religion, race, color, national origin, age, sex, height, weight, familial status, or marital status.

All clients shall be informed of their right to access housing and services without discrimination, and of their right to initiate a grievance process if they believe they have been discriminated against.

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<sup>i</sup> <https://www.onecpd.info/coc/>

<sup>ii</sup> <https://www.hudexchange.info/esg/>

<sup>iii</sup> [www.ewashtenaw.org/coc](http://www.ewashtenaw.org/coc)

<sup>iv</sup> <http://www.ewashtenaw.org/government/departments/community-and-economic-development/human-services/continuum-of-care/2017-governance-charter>

<sup>v</sup> [https://www.hudexchange.info/resources/documents/HomelessDefinition\\_RecordkeepingRequirementsandCriteria.pdf](https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf)

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vi [http://usich.gov/resources/uploads/asset\\_library/Housing\\_First\\_Checklist\\_FINAL.pdf](http://usich.gov/resources/uploads/asset_library/Housing_First_Checklist_FINAL.pdf)

vii <https://www.hudexchange.info/resources/documents/Rapid-Re-Housing-Brief.pdf>

viii <https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/>

ix <https://www.hudexchange.info/esg/esg-law-regulations-and-notices>

x <http://www.michigan.gov/mshda/0,4641,7-141-5515-241719--,00.html>