



**SONOMA COUNTY  
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**Sonoma County Homeless Coalition Coordinated Entry Committee  
Agenda for April 3, 2024  
12:00pm-1:30pm Pacific Time**

**Zoom link:**

<https://sonomacounty.zoom.us/j/92281657937?pwd=SW42V2tOcHdlY0o5OStQNFk3WUY4UT09>

	<b>Agenda Item</b>	<b>Packet Item</b>	<b>Presenter</b>	<b>Time</b>
1.	Welcome, Roll Call and Introductions		Committee Chair	12:00pm
2.	Approval of agenda (Action item)	1	Committee Chair	12:05pm
3.	Updates to program standards (Action item)	2	Lead agency staff	12:10pm
4.	The Commons referrals	3	HomeFirst staff	1:10pm
5.	Coordinated Entry Self evaluation	4	Lead Agency staff	1:15pm
6.	Public Comment on non-agenized items		Public	1:25pm

**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 Board Chair based on agenda scheduling demands and total number of speakers.*



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**Sonoma County Homeless Coalition Coordinated Entry Advisory Committee  
Executive Summary**

**Item:** 2. Updates to program standards

**Date:** April 3, 2024

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

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Agenda Item Overview

Staff is presenting updates to the standards of care for Emergency Shelter (ES), Rapid Rehousing (RRH) and Permanent Supportive Housing (PSH) project models. Additionally, staff is presenting the newly drafted Street Outreach (SO) standards. Staff is looking for approval of all these standards. Below is a description of the proposed changes to the ES, RRH and PSH standards.

**Changes to ES, RRH, and PSH Standards**

- **Emergency Shelter**
  - **Change to “Exits from Shelter” policy:**
    - Removes requirement that ES services be limited to 180 consecutive days. New policy allows providers to permit stays beyond 180 days, but providers cannot condition extensions on participation in case management. The State has recently indicated that they will not continue enforcement of the 180-day rule. This proposed change gives ES providers more flexibility with their shelter beds.
    - **Proposed language:** *TIME LIMITS: Shelters provide a safe temporary housing for individuals experiencing homelessness. Shelters may limit participant stays to 180 days in 1 stay. Shelters may allow participants to remain in shelter beyond 180 days, but they cannot condition the extension of services on engagement in case management. Shelters will develop their own policies and procedures for considering extensions.*
  - **Change to Non-discrimination policy:**
    - Provides more clarity on non-discrimination in ES projects. The new policy describes HUD’s Equal Access Final Rule, HUD’s Gender Identity Final Rule and provides information on preventing family separation in ES projects. The reason for this change was motivated by information contained in the 2023 Notice of Funding Opportunity for the Continuum of Care program which indicated that communities would be scored in part on their non-discrimination policies for ESG and CoC funded projects. This change makes the non-discrimination policy more explicit. The lead agency plans to hold mandatory trainings on these changes in the future.



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### ○ Proposed language:

#### ▪ NON-DISCRIMINATION

*All projects must comply with the non-discrimination and equal opportunity provisions of Federal civil rights law as specified at 24 CFR 5.105 (a) and 24 CFR 5.2005, including but not limited to.*

- *Fair Housing Act*
- *Section 504 of the Rehabilitation Act*
- *Title VI of the Civil Rights Act*
- *Title II of the Americans with Disabilities Act*
- *HUD's Equal Access Rule*
- *Violence Against Women Act (VAWA) Protections*
- *Local and state non-discrimination laws*

*Services are provided to program participants are offered in a nondiscriminatory basis with respect to race; color; national origin or citizenship status; age; disability (physical or mental); religion; sex; sexual orientation or identity; genetic information; HIV or AIDS; medical conditions; political activities or affiliations; military or veteran status; status as a victim of domestic violence, assault or stalking; or any other federal, state or locally protected group.*

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### EQUAL ACCESS FINAL RULE AND GENDER IDENTITY FINAL RULE

*Providers of the Sonoma County Homeless Coalition (SCHC) are required to adhere to HUD's Equal Access Final Rule and HUD's Gender Identity Final Rule. Through the final rules, HUD ensures equal access to individuals in accordance with their gender identity in programs administered by HUD's Office of Community Planning and Development (CPD). SCHC's shelter programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.*

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### PREVENTING FAMILY SEPERATION

*Projects will not separate family members. Projects will not deny a client because they want to enter shelter with a family member unless it would cause overcrowding in the unit.*

*Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, the following:*

- 1) *A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or,*
- 2) *A group of persons residing together, and such group includes, but is not limited to:*
  - a. *A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);*
  - b. *An elderly family;*
  - c. *A near-elderly family;*
  - d. *A disabled family;*
  - e. *A displaced family; and,*
  - f. *The remaining member of a tenant family.*

*If a group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, they are a family. A family must be served as such, regardless of how the present. Providers need to be able to serve every kind of family, regardless of the ages and sexes of the adults and children.*

*Examples*



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- 1) *A program cannot separate out or deny assistance to adult men that present as part of the family (e.g., fathers, uncles, the mother's boyfriend, etc.)*
  - 2) *A program may limit assistance to a household with children, it may not limit assistance to only one woman with children.*
  - 3) *If two adults present together as a family for shelter, the project must serve the two adults as a family and may not require proof of marriage and may not limit assistance to couples in a heterosexual relationship.*
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**HOW TO ACCOMMODATE FAMILIES**

- 1) *If a shelter has private rooms in which a family can stay together, then the family must be able to stay in a room together if they choose.*
- 2) *If the standard practice is to put down mats in a conference room for everyone who is considered "overflow" (beyond the capacity of the shelter beds), then it can shelter a family together in that space.*
- 3) *If the standard practice is to place a family in its own room, it would be acceptable to leave a bed empty to accommodate the family, (e.g., a family of four could stay in a unit with 5 beds, and the fifth bed could be open).*
- 4) *If a shelter has separate rooms for different genders, participants will be placed in the room that meets their gender identity.*
  - *Please see HUD FAQ 1529 for additional information: <https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included/>*

End of proposed language



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- **RRH & PSH**

- **Change to Non-discrimination policy:**

- Provides more clarity on non-discrimination in RRH and PSH projects. The new policy describes HUD's Equal Access Final Rule, HUD's Gender Identity Final Rule and provides information on preventing family separation in ES projects. The reason for this change was motivated by information contained in the 2023 Notice of Funding Opportunity for the Continuum of Care program which indicated that communities would be scored in part on their non-discrimination policies for ESG and CoC funded projects. This change is to make the non-discrimination policy more explicit. The lead agency plans to hold mandatory trainings on these changes in the future.

- **Proposed language:**

*All projects must comply with the non-discrimination and equal opportunity provisions of Federal civil rights law as specified at [24 CFR 5.105 \(a\)](#) and [24 CFR 5.2005](#), including but not limited to.*

- *Fair Housing Act*
- *Section 504 of the Rehabilitation Act*
- *Title VI of the Civil Rights Act*
- *Title II of the Americans with Disabilities Act*
- *HUD's Equal Access Rule*
- *Violence Against Women Act (VAWA) Protections*
- *Local and state non-discrimination laws*

*Services are provided to program participants are offered in a nondiscriminatory basis with respect to race; color; national origin or citizenship status; age; disability (physical or mental); religion; sex; sexual orientation or identity; genetic information; HIV or AIDS; medical conditions; political activities or affiliations; military or veteran status; status as a victim of domestic violence, assault or stalking; or any other federal, state or locally protected group.*

### **Equal Access Final Rule and Gender Identity Final Rule**

*Providers of the Sonoma County Homeless Coalition are required to adhere to [HUD's Equal Access Final Rule](#) and HUD's [Gender Identity Final Rule](#). Through the final rules, HUD ensures equal access to individuals in accordance with their gender identity in programs administered by HUD's Office of Community Planning and Development (CPD). HUD's housing programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.*

### **Housing for specific subpopulations**

*Providers may exclusively serve a particular homeless subpopulation in a permanent housing project if the housing addresses a need identified by the Coalition for the geographic area and meets one of the following:*

- 1) *The housing may be limited to one sex where such housing consists of a single structure with shared bedrooms or bathing facilities such that the considerations of personal privacy and the physical limitations of the configuration of the housing make it appropriate for the housing to be limited to one sex;*
- 2) *The housing may be limited to a specific subpopulation, so long as admission does not discriminate against any protected class under federal nondiscrimination laws in 24 CFR 5.105 (e.g., the housing may be limited to*



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homeless veterans, victims of domestic violence and their children, or chronically homeless persons and families).

- 3) The housing may be limited to families with children. However, it may not restrict housing or services to families with a single-sex parent. For example, it is not permissible to have a project that only serves women with children, the project must serve all families with children, regardless of the head-of-household's gender.

### Preventing Family Separation

*Individuals and families presenting for service will be asked if there are additional family members not present at intake and ask if those family members wish to reside with the referred individual. Projects will not separate family members. Projects will not deny a client because they want to live with a family member unless it would cause overcrowding in the unit.*

*Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, the following:*

- 3) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or,
- 4) A group of persons residing together, and such group includes, but is not limited to:
- 5) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
  - a. An elderly family;
  - b. A near-elderly family;
  - c. A disabled family;
  - d. A displaced family; and,
  - e. The remaining member of a tenant family.

*If a group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, they are a family. A family must be served as such, regardless of how they present. Providers need to be able to serve every kind of family, regardless of the ages and sexes of the adults and children.*

### Examples

- 4) A program cannot separate out or deny assistance to adult men that present as part of the family (e.g., fathers, uncles, the mother's boyfriend, etc.)
- 5) A program may limit assistance to a household with children, it may not limit assistance to only one woman with children.
- 6) If two adults present together as a family for housing, the project must serve the two adults as a family and may not require proof of marriage and may not limit assistance to couples in a heterosexual relationship.
- 7) A household cannot reduce the size of a family because one child is in foster care. If a family presents for permanent housing and one child is in foster care, it would be acceptable to house them in a larger unit and document it is necessary for family reunification.
  - Please see HUD FAQ 1529 for additional information: <https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included/>

End of proposed language



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### **Street Outreach (SO)**

The SO standards are attached. The SCHC's strategic plan priority 2.5b states "Implement a subregional approach to street outreach to achieve the goals of Built for Zero". The lead agency has worked with street outreach providers, representatives from jurisdictions that fund SO services, and individuals with lived experience to develop this model. This model seeks ensure that the entirety of Sonoma County is covered by street outreach, eliminates overlap between SO providers and is targeted at vulnerable individuals to prepare them for housing.

This model is a significant shift in SO service provision. It directs all SO providers to operate in a specific geographic area rather than roving the county. It also directs that these SO teams work with subregional By Names List (BNL) managers to coordinate care for unsheltered individuals in their geographic areas. Another important change is that this model directs SO providers to maintain caseloads of at least 20 unsheltered individuals.

This model will promote manageable workloads for SO providers, standardize the collection of data and delivery of services, eliminate duplication, and guide the Coalition on how to fund SO in the future. This approach has the support of almost all SO providers and other stakeholders.

### **Recommendation**

Approve the changes to the ES, RRH and PSH standards.

Approve the SO standards.



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Street Outreach Program Standards

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## Mission

The mission of Sonoma County outreach teams is to leverage a spirit of collaboration and coordination to create an equitable, compassionate, individualized and low-barrier outreach system that rapidly connects or provides individuals experiencing homelessness to resources and lowers barriers to services while treating everyone with respect and without judgment.

## Vision

Sonoma County outreach providers envision an outreach system that consistently and rapidly connects individuals experiencing homelessness to services and support to ensure that they can quickly exit homelessness. In the spirit of humanity, outreach providers will meet people where they are physically and emotionally.

## Guiding Principles

### Housing First

On September 29, 2016, Governor Jerry Brown signed Senate Bill 1380, making California a Housing First state. This requirement applies to any program providing housing or housing-based services to people experiencing homelessness or at risk of experiencing homelessness, whether or not the program was designed to address homelessness.

The Housing First model is an approach to serving people experiencing homelessness that recognizes a homeless person must first be able to access a decent, safe place to live, that does not limit the length of stay (permanent housing), before stabilizing, improving health, reducing harmful behaviors, or increasing income.

Under the Housing First approach, anyone experiencing homelessness should be connected to a permanent home as quickly as possible, and programs should remove barriers to accessing housing, like requirements for sobriety or absence of criminal history. It is based on the “hierarchy of need” where people must access basic necessities—like a safe place to live and food to eat—before being able to achieve a quality of life or pursue personal goals.

### Trauma-informed care

Sonoma County homeless service providers seek to provide a trauma-informed system of care. Trauma-informed services should include case management; onsite integrated health resources; ACEs-based programs; living skills programs focused on communication skills, grief/loss, and well-being.

### Collaboration

In recognition that funding does not cover enough street outreach to assist every homeless person in Sonoma County, we are aware that we must utilize and share our resources as efficiently and effectively as possible.

This approach will be supported by data sharing, however, communications must not reveal confidential details regarding any particular individual or their supports unless there is consent by the unsheltered person to do so.

We will maintain a system of intensive and relational collaboration between street outreach workers whether they work for an agency, are volunteers or are paid and supervised by Sonoma County. We pledge to put aside any differences of salary, experience, education and skill sets in order to get people into shelter and housing as quickly as possible.

## Approach to Street Outreach

Street Outreach (SO) workers in Sonoma County provide housing-focused services to unsheltered individuals. They engage the most vulnerable to develop rapport, explaining and connecting individuals to services. They assist individuals to prepare for housing by providing Coordinated Entry enrollment and assist with document readiness. They also provide goods and services that help unsheltered individuals to reduce the trauma of unsheltered homelessness and to make sure their basic needs are met.

Housing plans will vary depending on an individual's barriers, their level of trust with the system and their desire for housing. If an individual is expected to be referred to housing or expresses a desire to be document ready, services will focus on getting the client ready for a housing opportunity. If individuals are not ready to engage in these services, housing plans will focus on developing rapport, explaining the service system and meeting basic needs.

Grassroots SO teams play an integral role in providing outreach services to unsheltered individuals. Subregions will coordinate with grassroots teams in their subregions to help meet individuals' immediate needs and to coordinate services.

## Applicability

These standards apply to any street outreach program that receives funding from the Sonoma County Continuum of Care. These standards apply regardless of the type of funding. Street outreach organizations who are not funded through the Sonoma County Continuum of Care are encouraged, but not required, to adopt these standards.

## Definitions

**CoC-funded outreach/CoC partnering:** Outreach funded by the Sonoma County Continuum of Care (CoC) or outreach teams that have adopted these standards. These standards apply to programs funded by the CoC. CoC-funded outreach operates in specific subregions of the county.

**Grassroots outreach:** Volunteer-led outreach programs. CoC-funded outreach providers work with these agencies in their subregion to coordinate services.

**Population specific outreach:** Outreach services that serve specific populations (veterans, TAY) throughout the county. These providers work across subregions to coordinate care.

**Non-traditional partners:** Agencies/individuals that provide information and connection to individuals experiencing homelessness. Examples include, law enforcement, park rangers, schools, members of a church or any other individual or entity that is interacting with individuals experiencing homelessness.

## Regulatory guidance/Eligible activities

Eligible activities/costs for street outreach can be found at [24 CFR 576.101](#). Activities can include the following:

- **Engagement** (§ 576.101(a)(1)): Activities to locate, identify and build relationships with individuals or families living in unsheltered settings for the purpose of providing immediate support, intervention, and connections with homeless assistance programs or mainstream social services and housing programs.
- **Case Management** (§ 576.101(a)(2)): Assessing housing and service needs, and arranging, coordinating, and monitoring the delivery of individualized services.
- **Emergency Health Services** (§ 576.101(a)(3)): Outpatient treatment of urgent medical conditions by licensed medical professionals in community-based settings (e.g., streets, parks, and campgrounds). These services are eligible only to the extent that other appropriate health services are inaccessible or unavailable within the area.
- **Emergency Mental Health Services** (§ 576.101(a)(4)): Outpatient treatment of urgent mental health conditions by licensed professionals in community-based settings (e.g., streets, parks, and campgrounds). These services are eligible only to the extent that other appropriate mental health services are inaccessible or unavailable within the area.
- **Transportation** (§ 576.101(a)(5)): Travel by outreach workers, social workers, medical professionals, or other service providers during the provision of eligible street outreach services. Also includes the costs of transporting unsheltered people to emergency shelters or other service facilities.
- **Services for Special Populations** (§ 576.101(a)(6)): Otherwise, eligible Essential Services that have been tailored to address the special needs of homeless youth, victims of domestic violence and related crimes or threats, and people living with HIV/AIDS who are literally homeless.

## Ensuring geographic Coverage

The Sonoma County CoC strives to cover 100% of Sonoma County with SO services. To ensure full geographic coverage, CoC-funded street outreach teams must serve a specific geographic region.

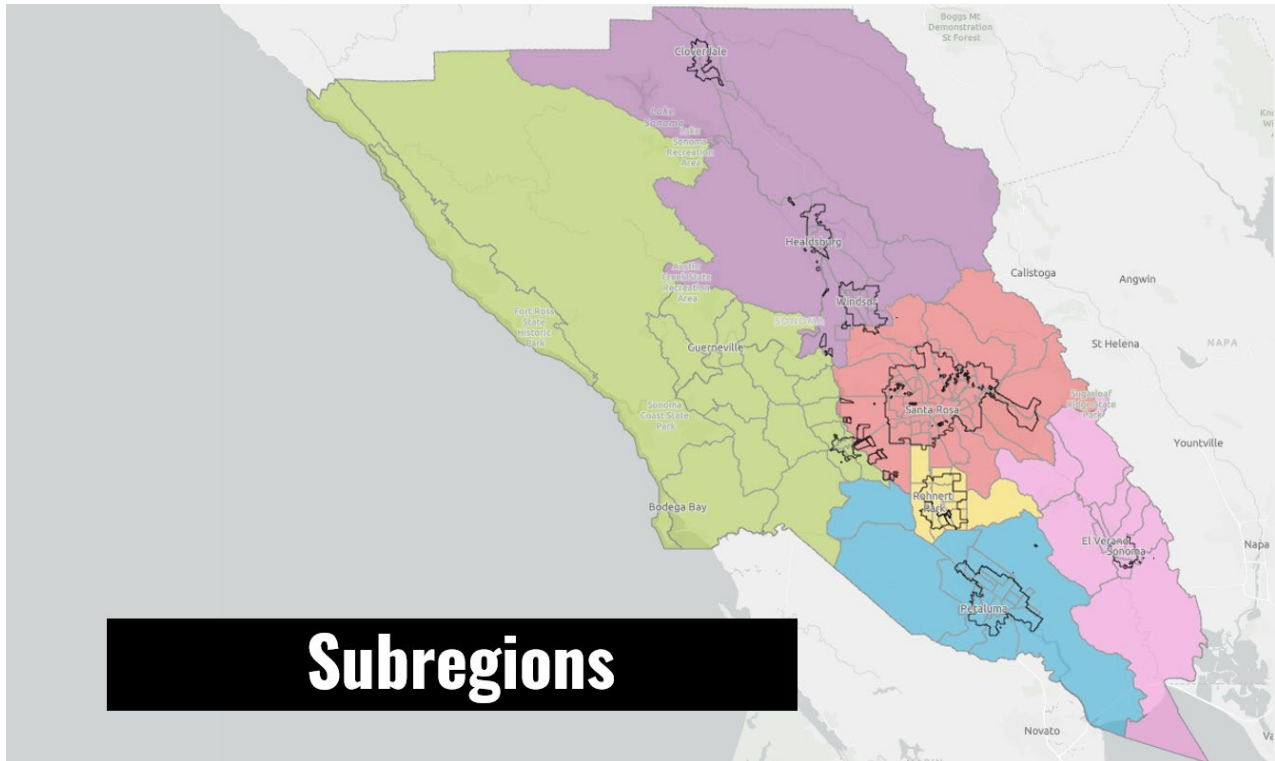
Outreach teams that serve a specific population like TAY or veterans shall coordinate with BNL managers to avoid duplication of efforts and to understand where the clients are in the housing process.

If there is more than one outreach team in a subregion, these teams must coordinate their services in specific geographic areas of their subregion to avoid duplication. This will be coordinated through the subregional BNL case conferencing meetings.

If there are remote geographic areas in a subregion, SO teams and the subregional BNL managers will develop relationships with non-traditional partners to ensure that individuals experiencing homelessness in these areas can be identified and engaged by outreach teams.

## Subregions

To improve the coordination among outreach teams and maximize outreach capacity, the Continuum of Care (CoC) board adopted a subregional approach to outreach at its March 22, 2023 meeting.



### Coordination of services within a subregion

Outreach teams will work with their subregion's By Names List (BNL) manager to coordinate among providers in a subregion. Each sub region's BNL manager will develop relationships with non-traditional partners and CoC-funded outreach teams. Outreach teams are expected to have consistent presence at the sub-region's BNL meeting to ensure they avoid duplication of services, full geographic coverage and to ensure all individuals experiencing homelessness are accounted for.

### Outreach deployment

Deployment of street outreach teams will be coordinated by subregional BNL managers. Outreach teams will be deployed at locations and times that they are most likely to engage with unsheltered individuals. Outreach teams will ensure that they are not duplicating services. If there is more than one outreach team in a subregion, those teams will establish specific geographic areas within their subregion. Outreach teams will also coordinate with population-specific outreach teams to ensure individuals who qualify for these outreach services are connected with those outreach teams.

## Case load rationing

CoC-funded outreach providers will maintain caseloads of 15-25 unsheltered individuals per outreach worker. Caseload sizes will vary depending on the complexity of the individuals they are serving but teams will strive to serve as many individuals as possible in an authentic and meaningful way.

Approximately 60% of a team's caseload will be persons actively working on activities or goals that directly assist the person in progressing toward housing. Individuals who are on Coordinated Entry's priority list will be prioritized for housing preparedness and document readiness services. Approximately 40% of a team's caseload will be individuals whose cases are complex and require significant staff time to overcome barriers to permanent or interim housing.

A client declining services does not mean they will be removed from a caseload rather the nature of the services will be modified. Services for these individuals will focus on rapport building, explaining services, providing goods to lessen the burden of unsheltered homelessness and to be available when the client is ready to engage.

In acknowledgement of the fact that not all individuals experiencing unsheltered homelessness can be placed on a caseload, SO teams will provide at least 2 hours of general outreach per week in their geographic region. This outreach will be conducted in areas where SO workers are most likely to encounter individuals experiencing unsheltered homelessness. Individuals not on a caseload will be provided with light-touch services including, connection to shelters, assistance with CE enrollment and resource connection.

Individuals will remain on a caseload until they are placed in shelter or housing. Street outreach providers can keep individuals on their caseload for 2 weeks after housing or shelter to ensure a warm handoff to the housing provider.

Individuals may be transferred to another team's caseload if that individual has moved to another subregion. These transfers will be facilitated by subregional BNL managers. (See "moving between subregions" policy below) Subregional BNL managers may provide direction to outreach teams on who should be placed on a caseload.

## Case Conferencing

Each subregion will manage a By-Names-List (BNL). This list will be regularly updated through BNL case conferencing. CoC-funded outreach teams will ensure that at least 1 representative from the outreach team is present at each BNL case conferencing meeting. This representative will be able to provide in depth, client-level information about all clients they are serving. BNL meetings will also be used to coordinate services, caseloads and deployment of outreach teams.

## Coordinated Entry Participation

CoC-funded outreach providers must act as a Coordinated Entry External Access Point (CEEAP), offering full access and assessment to the Coordinated Entry System (CES). Grassroots street outreach programs are encouraged to be CEEAP or Access Partners. Clients who present to Street Outreach teams shall, to the greatest extent possible, enter all individuals requesting or needing access to the CES. If due to staffing shortages or full caseloads the SO team does not have the capacity to enroll an individual presenting for service, the SO team will screen the participant for CE enrollment and refer them to an external access point.

The definition of an External Access point is an Emergency Shelter or Street Outreach project offering Coordinated Entry assessments to ALL participants who present seeking or requiring CES assistance. Assessment interviews and data entry into the CES shall occur regardless of where the individual spends most of their time, enrollment status in any project, provider-client relationship, or population type. An access point will screen each program participant for enrollment in CE when engaging with a client, if the client is not enrolled, the access point will offer assessment and enrollment. The outreach provider will make a case note to ensure the program participant is active in CE. The access point will also upload a release of information (ROI) to the client's CE dashboard in HMIS.

## Documentation

Gathering documentation is beneficial to collaborative case management, housing providers and most importantly, clients. Street outreach workers will assist willing participants in acquiring documents for housing readiness. These documents shall be uploaded to the client's Coordinated Entry dashboard to aid in housing referrals. These documents should include;

- 1) Photo Identification
- 2) Social security card
- 3) Award letters
- 4) Birth Certificate (if needed)
- 5) Verification of disability
- 6) DD-214 form (if applicable)
- 7) Service Animal/emotional support animal documentation (if applicable)
- 8) Medical card
- 9) CalFresh Card
- 10) Copy of housing voucher (if applicable)

Street outreach workers will also make case notes of significant interactions with clients that describe their housing/shelter status in an agency's internal program or in the client's CE dashboard if they have consented to HMIS enrollment. Ideally, case notes would incorporate the following

- 1) Description of client location
- 2) Description of services
- 3) Contact information
- 4) Referrals to services (if applicable)



Street outreach workers are essential to documenting chronic homelessness status. When a client is referred to a permanent housing intervention, the street outreach case worker shall coordinate with the housing provider to assist in documenting chronicity.

## Encampment Closure

An encampment is defined as a group (as defined by the local jurisdiction) of unsheltered persons occupying space on public or private property in a tent, tarp or other handmade structure, or a group occupying a building on public property for the purpose of habitation.

The closure of encampments is a process that is largely driven by city and county officials in coordination with other stakeholders. If an encampment is identified for closure, street outreach providers will work with their subregion's BNL case conferencing team to gather information about those in the encampment and to coordinate services. More frequent outreach will be provided to individuals in advance of the closure, as defined by contractual obligations and caseload capacity.

## Warm Hand off

A warm handoff is defined as a process where a person or organization helps transition an individual or family from one service provider or agency to another in a caring and supportive manner with the consent of the client. A warm hand off occurs with the client present, unless the client declines or is otherwise unable to attend. The information that is shared is intended to ensure that the receiving supportive service provider is aware of the needs and desires of a client. Warm hand-offs work best when the client is present to clarify or correct the information that is shared. If the client is not present during the warm handoff, the receiving case manager will verify the information with the client to ensure completeness and accuracy.

Warm handoffs will occur when a client enters housing or transitions to a different subregion. When a client is initially housed, the client will remain on the street outreach worker's caseload for up to two weeks to ensure the housing provider is able to understand the client's needs.

Warm handoffs between subregions will be coordinated through subregional BNL meetings. If a client moves from one subregion to another, street outreach workers will discuss a potential transfer to another subregion's BNL. If the client is moving between subregions, street outreach workers will discuss transferring the client to another street outreach provider's caseload. If the client prefers to remain on a caseload, the street outreach team can elect to maintain that client. If the client is imminently moving into housing, a BNL transfer will not occur.

## Standardizing handoff between subregions

SO workers will facilitate warm hand offs to other projects. These handoffs will be coordinated through BNL managers. Warm hand offs will occur when an individual moves between subregions or when they are accepted into an interim or permanent housing program. SO providers may keep individuals on a caseload for up to 2 weeks after permanent housing placement to ensure a warm handoff with the housing provider.

## Movement between subregions

When a client has been identified as duplicated on multiple sub regional BNLs, or otherwise identified as being in multiple subregions for thirty days the client will determine their primary subregion and subregional outreach team. A client will NOT be moved to a new case manager/subregional BNL if they are in CE's priority group (likely housing placement within 30 days) or have a non CE related imminent housing placement.

If a client is on a caseload and elects to move to another subregion, SO workers will discuss the possibility of not being able to receive immediate case management in the new subregion.

## Communication of available services

Street outreach providers are responsible for being knowledgeable about the services that are available in their subregion and more broadly throughout the county. SO providers will provide accurate information to unsheltered individuals when it is requested. Information will be provided verbally or in writing, if requested. If a service changes in a subregion, SO teams will inform subregional BNL managers of these changes. This can be done in the county-wide case conferencing meeting or through email. BNL managers will also communicate changes to services and service availability to their subregion's SO team(s). Providers are encouraged to update their information with 211 current. Providers can contact the lead agency for assistance with contacting 211.

## Provision of goods

The provision of goods encompasses the distribution of essential items to individuals experiencing homelessness. This can include items such as food, clothing, hygiene products, blankets, sleeping bags, and tents. The provision of goods is not the main focus of SCHC-funded street outreach providers; however, providing material assistance to individuals experiencing homelessness is an important way to meet individuals' immediate basic needs while helping to develop rapport. Provision of essential items will never be conditioned upon acceptance of a service. When funding is available, SO providers will strive to provide essential items. SCHC-funded SO teams are encouraged to coordinate the provision of goods with other street outreach teams whenever appropriate.

## Inclement weather/ warming/cooling centers

In the event of inclement weather, street outreach providers will work with the jurisdictions in their subregion to develop lines of communication and outreach strategies if/when a warming/cooling center will be opened so that individuals experiencing homelessness are informed about the availability of the centers. BNL managers will inform participants of their subregional BNL meeting if a warming/cooling center is open. SO providers will prioritize informing highly vulnerable unsheltered clients of these services when they become aware of them, and for those who choose not to access warming/cooling centers or cannot access them, SO will work with those individuals on safety techniques during the inclement weather.

## Non-traditional partners

Street outreach (SO) workers will develop relationships with non-traditional partners in their subregion. These partnerships are intended to allow SO teams to have in-depth information about individuals experiencing homelessness. Non-traditional partners should be able to connect individuals experiencing homelessness with an outreach team. Confidential information should not be shared with non-traditional partners unless they are on the HMIS/CE release of information.

## Data Collection

HUD HMIS data standards that apply to street outreach can be found here: [https://www.hudexchange.info/programs/hmis/hmis-data-standards/standards/HMIS\\_Data\\_Entry.htm](https://www.hudexchange.info/programs/hmis/hmis-data-standards/standards/HMIS_Data_Entry.htm) CoC-funded SO projects must comply with these standards. SO projects are required to complete HUD entry and exit assessments as well as record contacts with clients and engagements. SO projects are also required to report data quality.

Data collection for street outreach is designed to assist in sub-regional and county-wide case conferencing. The Sonoma County BNL manual describes BNL data standards. SO teams will complete HUD entry and exit assessments when a client is added to their caseload. SO projects complete the Built for Zero (BFZ) touchpoint regularly as they work with clients. SO projects are not expected to have responded to all data elements at initial engagement. SO providers will participate in subregional case conferencing to add additional information about a client's case.

## Denial of Services

If an unsheltered individual has engaged in behavior that presents a credible threat to street outreach staff, their property, or other clients, SO providers may deny services. Service denials must be documented and communicated to the individual as soon as it is safe to do so. Service denials may be communicated verbally.

Service denial cannot be permanent. SO providers will develop policies and procedures for documenting and communicating service denial including how to appeal the initial decision as well as how to review the decision based on changing circumstances. Individuals who are denied services must be able to appeal the service denial or request a review at any time. If the credible threat is resolved based on changed circumstances, services must be continued.

Information relating to service denial must be communicated to subregional BNL managers. BNL managers will work with other agencies within their subregion to attempt to identify alternate services/providers willing to offer services.

## Engagement on public and private property

Street outreach providers shall provide services to unsheltered individuals in public areas in the geographic region they serve. Street outreach services may also be provided inside public spaces like libraries with the consent of the staff within those public buildings.

Street outreach may also be provided in quasi-public areas like parking lots unless the property owner requests that they not do so.

Street outreach services can be provided on private land with the expressed consent of the property owner or the jurisdiction and in alignment with the agency's policies and procedures.

## Consent

Many homeless people are mistrustful of the Sonoma County and Federal bureaucracy. Many don't trust local homeless service providers either. This mistrust is not unreasonable.

A homeless individual may have been disappointed by a former case worker, been placed in a facility that exacerbated their mental health or other problems, or been mistreated by an unrelated Federal program. Some have faced the injustice of the criminal justice system. Some grew up with the injustice of abuse and trauma in their family. Some have simply given up due to the complexity and difficulty of improving their situation through our complicated system of care. Many have become cynical, apathetic and/or hopeless and believe that they will never get the help they need.

Although it may take years, Street Outreach workers can sometimes build the trust necessary to break through these barriers. We understand that SO workers also change jobs or disappear from their client's lives for other reasons. For this reason, SO workers should not make promises unless they are personally certain they can keep those promises.

SO providers are encouraged to listen carefully and sympathetically to explanations as to why a homeless person doesn't want to give information or sign Release of Information documents. They are encouraged to validate the strength, courage and stamina that allows a human to live without a home. And, they are asked to encourage every homeless person to find hope and allow their SO worker to help as much as possible.

Outreach services are not contingent on a client's consent to be enrolled in HMIS. Regardless of formal consent of services, SO will continue to try to engage with individuals to gain consent. SO providers shall explain the benefits of consent and the service limitations that refusing to consent to enrollment may cause. SO providers shall collect explicit consent from clients before entering information into HMIS. Consent shall be obtained by completing the Sonoma County Coordinated Entry (CE)/HMIS release of information and uploading it to the client's CE dashboard. Clients can request to be enrolled in CE in a deidentified manner.

The IMDT release of information, and any other release of information, can also be signed with the client but only the Sonoma County Coordinated Entry/HMIS release provides consent for enrollment in HMIS. Any other ROIs that are collected shall be uploaded to the client's CE dashboard.

## Safety/ individuals in crisis

Street outreach teams may encounter or witness the inherent risks that are involved with street outreach. If a situation is deemed by street outreach staff to be too high risk, they may refuse to have direct contact with the individual until that risk has been mitigated. Street outreach providers will communicate these situations to their supervisors, the subregional BNL managers and other outreach teams to ensure all are aware of the risks.

Street outreach staff may encounter individuals experiencing a mental health crisis. In these circumstances, street outreach staff will contact crisis response teams or other emergency services, where available, if they deem the client to be a danger to themselves and others, or are gravely disabled.

Other dangers they face are exposure to contaminated sharps, accidental exposure to fentanyl and other substances, unrestrained aggressive animals, domestic violence disputes, escalating incidents, etc. The outreach team must prioritize their safety above all other considerations. Regular training and an active safety plan are essential for handling unsafe situations. The following are a few key elements:

- 1) Never go out alone. Teams of 2 are minimal.
- 2) Carry a charged phone
- 3) Have Narcan with you at all times, know its location and how to use it.
- 4) Establish code words among teams, known to signal threats to safety
- 5) Communicate with someone outside the team about where you plan to outreach
- 6) Wear uniforms or name tags to be easily identified as street outreach
- 7) Have phone numbers accessible such as a police and/or crisis response on hand
- 8) Be trauma informed and practice de-escalation
- 9) Use harm reduction principles
- 10) Document and communicate.

Street outreach staff and their employer are responsible for promoting personal safety of street outreach staff and taking the necessary measures to decrease risks as is reasonable in the context of street outreach.

## Street Outreach Interaction with Law Enforcement

Except when required to do so through Mandated Reporting, street outreach staff shall never be the entity responsible for communicating or leading enforcement activities.

Whenever possible, street outreach staff shall be available to assist unsheltered homeless individuals in the event law enforcement engages in activities that dislodge the individual(s) from where they are staying, when notified by law enforcement in advance of enforcement activities. Efforts shall be made by street outreach staff, while balancing existing caseloads, to make referrals and help the individual connect to resources in the event of enforcement activities. Street outreach staff are present to assist the homeless individual only, and are not engaged in any enforcement activities themselves.

When there is planned closure of an encampment, or outreach becomes aware of high frequency of law enforcement activity with particular individual(s), street outreach shall provide advanced targeted outreach

efforts, and provide information on their efforts when consents are in place to do so, without providing personal identifying information to law enforcement.

In some cases local law enforcement has embedded teams that are focused on trauma-informed response to homelessness or related special populations. When these teams undertake outreach and engagement activities they may request street outreach staff participate in those activities with them. Street outreach staff may participate when operationally available, and they assess based on local conditions that their participation will not jeopardize the relationship between the street outreach staff and the unsheltered community. Street outreach staff will actively seek input from the unsheltered community targeted for engagement to aid in this assessment.

In some circumstances, street outreach staff may witness behavior or actions on the part of an unsheltered person that triggers a legal mandate to report the incident to law enforcement (e.g. human trafficking). Street outreach staff will do so promptly and thoroughly in these instances, in accordance with training on Mandated Reporting.

## Confidentiality

Street outreach workers shall maintain the confidentiality of clients' information. Clients will be encouraged to sign the HMIS/ CE release of information to facilitate service coordination. If the client has not signed a ROI, street outreach workers shall communicate the name of the client, efforts to work with the client to sign the ROI and the location of the client to a BNL manager but shall not share any additional information. Street outreach workers will obtain separate written consent for ANY disclosure of individual services status or PHI to entities outside of the HMIS/CE release of information outside of Mandated Reporting requirements. Street outreach workers will follow the Privacy Compliance policy of the County of Sonoma HMIS Policies and Procedures, including the "Resistance to Outside Disclosures" policy at all times. Street outreach workers must keep paperwork stored in a secure and locked location.

## Record Keeping

Record keeping and reporting requirements can be found at [24 CFR § 576.500](#). All SO providers must have policies and procedures in place to ensure they can meet these requirements. All required documents must be maintained in participant files.

## Grievances

SO providers will develop their own policies and procedures for participant grievances. Grievances include: appeals of decisions that impact SO participants and grievances regarding SO policies or perceived unfair/inequitable treatment by agency staff. Participants should inform clients about their grievance policy upon intake. Copies of the grievance policy should be provided to participants upon intake into the SO program. SO staff will make grievance forms available to clients upon request. Clients should be informed of how their grievance will be handled and given a timeframe for completion of each step of the process.

## Reasonable Accommodations

Individuals can make requests for reasonable accommodations to any project staff member, in any form, at any time. Project staff should be available to assist individuals with requests for reasonable accommodations. Individuals making requests for reasonable accommodations must participate in assessment and an interactive process with staff for requested accommodations to be considered.

A reasonable accommodation is a change, exception or adjustment to a program, service, building or dwelling unit that will allow a qualified person with a disability to

- Participate fully in a program;
- Take advantage of a service;
- Live in a dwelling

To show that a requested accommodation may be necessary, there must be an identifiable relationship, or nexus, between the requested accommodation and the individual's disability. When a client requires an accessible feature(s), policy modification, or other reasonable accommodation, the project must provide the requested accommodation unless doing so would result in a fundamental alteration in the nature of the program or an undue financial and administrative burden. A fundamental alteration is a modification that is so significant that it alters the essential nature of the program. In such a case, if possible, the program will offer an alternative solution that would not result in fundamental alteration of the program or a financial or administrative burden.

## Non Discrimination

Services provided to program participants are offered in a nondiscriminatory basis with respect to race; color; national origin or citizenship status; age; disability (physical or mental); religion; sex; sexual orientation or identity; genetic information; HIV or AIDS; medical conditions; political activities or affiliations; military or veteran status; status as a victim of domestic violence, assault, or stalking; or any other federal, state or locally protected group.

Providers of the Continuum of Care are required to adhere to HUD's Equal Access Final Rule and HUD's Gender Identity Final Rule. Through the final rules, HUD ensures equal access to individuals in accordance with their gender identity in programs and shelter funded under programs administered by HUD's Office of Community Planning and Development (CPD). HUD's housing programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.



**SONOMA COUNTY**  
**HOMELESS**  
**COALITION**

## **Sonoma County Homeless Coalition Coordinated Entry Advisory Committee Executive Summary**

**Item:** 4. The Commons referrals

**Date:** April 3, 2024

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

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### Agenda Item Overview

The Commons, formerly known as “The Gold Coin,” is a Continuum of Care (CoC-)funded PSH project. Being a CoC Program funded PSH project, the project is required by HUD to serve exclusively chronically homeless individuals. This project has a HUD approved eligibility requirement that individuals have an active Housing Choice Voucher (HCV). The Commons project does not currently have rental assistance funds. The eligibility requirement to have HCVs provides the rental assistance and makes the project viable.

Coordinated Entry (CE) has been referring to the project but the requirement to have an active HCV has made it increasingly difficult to refer clients. CE has referred almost all the individuals in the PSH range with an active HCV to the project, but some units remain open. Many of these referrals have not come from the top of the list like most PSH projects because CE must search the list for individuals with HCVs. To do so, CE has had to go down the list. For context, normal PSH referrals are for individuals who score around 35 on the prioritization tool. The individuals being referred are close to the Rapid Rehousing (RRH) range for referrals (4-8).

This is concerning because our PSH policies state that we will only refer individuals who score 9 or above. Referring people outside the PSH range would be outside the PSH and RRH standards. Additionally, CE cannot be sure that less vulnerable individuals will meet the chronic homelessness status. Currently, CE is still able to make PSH level referrals. There are currently 3 units left to fill. CE hopes to fill these with program transfers from the Tamayo Village project which is closing due to the closure of SAY. However, if those referrals are rejected, CE will have very few, if any, individuals in the PSH range to refer to this project.

Staff has spoken to the operator of The Commons, St. Vincent De Paul (SVDP), and expressed these concerns. SVDP has stated they are seeking other rental assistance options like project-based vouchers and/or seeking other rental assistance funds through the CoC program.

### Recommendation

None. Information only





**SONOMA COUNTY**  
**HOMELESS**  
**COALITION**

**Sonoma County Homeless Coalition Coordinated Entry Advisory Committee  
Executive Summary**

**Item:** 5. Coordinated Entry Self evaluation

**Date:** April 3, 2024

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

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Agenda Item Overview

The Sonoma County Coordinated Entry (CE) policies and procedures state that the Coordinated Entry Advisory Committee (CEA) will complete HUD's CE self-assessment annually. This self-assessment is sometimes required for funding applications. Last year, staff and HomeFirst staff guided this committee through most of the self-assessment but did not complete it.

Lead-agency and HomeFirst staff will guide the committee through several questions. Lead agency staff has created a slide deck that will help you understand what each question. Each question will be listed and in red, below is information on the local CE system that responds to it.

Recommendation

None. Information only