

# **Allegheny County Coordinated Entry Policies & Procedures**

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*January 2023*

## DEFINITIONS AND ACRONYMS

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**Allegheny County Department of Human Services (ACDHS or DHS):** ACDHS/DHS is the Lead Agency who administers HMIS and serves as the CoC Collaborative Applicant.

**Allegheny Housing Assessment (AHA):** The AHA is a decision support tool designed to help prioritize admissions to supportive housing services for individuals and families experiencing homelessness. <https://www.alleghenycounty.us/Human-Services/News-Events/Accomplishments/Allegheny-Housing-Assessment.aspx>

**Homeless and Housing Services:** Allegheny County Department of Human Services' Office of Community Services houses the teams that administer Coordinated Entry functions as well as the monitoring support as the funder for programs serving people experiencing homelessness.

**Coordinated Entry System (CES):** A Coordinated Entry System is an evidence-based strategy that focuses on housing and service coordination to ensure all people experiencing a housing crisis have fair and equal access and are linked to the most appropriate housing solution based on their needs.

**HUD Chronically Homeless (CH):** The definition of "chronically homeless" currently in effect is that which is defined in the [Final Rule 24 CFR Parts 91 and 578](#) which states that a chronically homeless person is:

1. An individual who:
  - a) Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
  - b) Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months. Occasions are separated by a break of at least seven nights.
  - c) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act

of 2000 (42 U.S.C. 15002)), post- traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition before entering that facility; or

3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless. In order for a family to qualify as chronically homeless, the Head of Household must have a documented disability.

**Continuum of Care (CoC):** Continuum means the group organized to carry out the responsibilities required under the CoC Program Interim Rule (24 CFR Part 578) and is comprised of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, and law enforcement, and organizations that serve homeless and formerly homeless persons to the extent that these groups are represented

**Emergency Solutions Grant (ESG):** HUD administers ESG funds to engage homeless individuals and families living on the street, to improve the number and quality of emergency shelters, help operate emergency shelters and provide essential services to residents, rapidly rehouse individuals and families and prevent families and individuals from becoming homeless.

**Homeless Advisory Board (HAB):** The HAB is a public/private partnership formed to assist and recommend Allegheny County, the City of Pittsburgh, the City of McKeesport and the Municipality of Penn Hills on public policy, programs, activities, data, and all other efforts that will eliminate homelessness and improve the wellbeing of homeless persons and families.

**Homeless Assistance Programs (HAP):** HAP is administered by the state of Pennsylvania. HAP administers funding for case management, rental assistance, bridge housing, emergency

shelter, and innovative supportive housing programs. It is part of the Human Services Block Grant.

**Homeless:** The [Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\) Act Final Rule](#) defines a homeless person or family as:

1. Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or a place not meant for human habitation immediately before entering that institution;
2. Individuals and families who will imminently lose their primary nighttime residence;
3. Unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition;<sup>1</sup> or
4. Individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member.

**Homeless Management Information System (HMIS):** HMIS is the information system designated by a local Continuum of Care (CoC) to comply with the requirements of CoC Program interim rule 24 CFR 578. It is a locally administered data system used to record and analyze client, service and housing data for individuals and families who are homeless or at risk of homelessness. HMIS is a valuable resource because of its capacity to integrate and unduplicated data across projects in a community. Aggregate HMIS data can be used to understand the size, characteristics, and needs of the homeless population at multiple levels: project, system, local, state, and national.

**Housing First:** The guiding principle for the homeless system that prioritizes providing housing to people experiencing homelessness so that housing can serve as a platform from which they can pursue personal goals and improve their quality of life. This approach is guided by the belief that people can better address complex life challenges -- getting a job,

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budgeting properly or attending to unhealthy substance use issues – after their basic needs are met: food and a safe, permanent place to live.

**Penn-Free Bridge Housing:** A housing program designed to serve individuals and families with members who have a history of unhealthy substance use and who are experiencing homelessness. Penn-Free Bridge Housing provides rental assistance and supportive services for up to one year with the goal of successfully exiting the program to permanent housing.

**U.S. Department of Housing and Urban Development (HUD):** HUD serves over 1 million people through emergency, transitional, and permanent housing programs each year.

### ***Revision and review policy***

This is not an operational manual and does not lay out step-by-step procedures for implementation of these policies. Since this document does not include those operational policies, it is not expected that it will require frequent updates. This document will be updated as needed when there are significant changes to CE policies.

Additionally, the Homeless Advisory Board (HAB), the governance body for the CoC, will review and approve the policies and procedures annually.

Annually, at a minimum, feedback will be solicited from providers and households utilizing homeless services through CE. Feedback will be solicited using focus groups and surveys. Quantitative data will also be utilized. This information will be used to improve the processes of CE. Those changes will be incorporated into the policies and procedures.

# ACCESSING COORDINATED ENTRY

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## Introduction

The Allegheny County Coordinated Entry System (CES) covers Allegheny County in its entirety. The objective of the CES is to ensure streamlined access to the Allegheny County Continuum of Care's (CoC) homeless response system for all households that are facing housing instability or experiencing homelessness and ensure they are matched to an appropriate intervention to end their crisis or homelessness. Arbitrary barriers to housing have been removed from all programs participating in Allegheny County's CES, as there is a Housing First focus, that is inclusive of those funded through the CoC Grant and Emergency Solutions Grant (ESG). The CoC has adopted HUD CPD 16-11, HUD's *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing*, as well as the accompanying update HUD CPD-17-01, *Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System*. (Links to those documents found below). The Allegheny Link & Office of Community Services (OCS) Field Unit function as the single access point for the CE in Allegheny County. All households seeking service are provided fair and equal access regardless of their location or method by which they access the system.

### **When accessing Coordinated Entry persons experiencing homelessness can expect:**

- to be treated with dignity and respect
- to receive fair and equal access to information and guidance about housing assistance for which they are eligible
- to be screened for integrated services through all CoC participating providers and programs

### Coordinated Entry Coverage

The Allegheny County CoC employs a centralized approach to Coordinated Entry. The CE is comprised of the Allegheny Link and the OCS Field Unit. The Allegheny Link is the one-stop access point for Coordinated Entry and serves the entire geographic region of Allegheny County and PA-600. The Allegheny Link Service Coordinators are available weekdays from 8:00 am to 5:00 pm. The Allegheny Link can be accessed in multiple ways:

- By Phone: 1-866-730-2368
- In Person: Allegheny Link, One Smithfield Street Pittsburgh, PA 15222
- By Email: alleghenylink@alleghenycounty.us

Through partnership and collaboration, other call centers and community service providers e.g., 211, AAA SeniorLine, resolve, food pantries, 412 Youth Zone, etc., assist households in connecting to Allegheny Link. This occurs through warm transfers of the households to the phone line, emails directly to Allegheny Link or connection to the OCS Field Unit.

### Coordinated Entry Outreach (OCS Field Unit)

The OCS Field Unit acts as a bridge between those who are street homeless and unable to contact Allegheny Link through any of the three-mentioned means. The OCS Field Unit consists of skilled field service coordinators who partner with Street Outreach Teams to bring CE to those who are unsheltered. Additionally, the OCS Field Unit has regularly scheduled hours at many of the day drop-in centers, medical clinics and libraries where people experiencing homelessness may visit. The locations and hours are communicated to the public via the Allegheny County Department of Human Service (DHS) website and emails to distribution lists. Street Outreach providers can connect directly with the OCS Field Unit to ensure that those who are encountered on the street are prioritized in the same manner as others who are accessing the CE.

### *Accessing Emergency Shelter*

Single individuals who do not have a safe place to stay that evening can access the shelters by presenting or calling to the emergency shelter directly. Individuals do not have to contact the Allegheny Link to obtain referrals for emergency shelters. Individuals who do contact the Allegheny Link will be given information about the emergency shelter locations and intake times and will be assisted in developing a plan and strategy to access the shelter program of their choosing. CE also manages access to a smaller subset of shelter options for single adults that operate under an “invite-only” access model. Individuals are identified for these spaces in partnership with the Street Outreach community of providers and are geared toward those who

might otherwise be insufficiently served by a traditional shelter setting. CE is responsible for sending out a daily email to a distribution list of CoC homeless providers and a broad range of community partners listing out important resource updates, learning opportunities, and the daily reported vacancies from each of the single emergency shelter providers funded by the CoC.

Access to family shelters within the CoC is managed by CE through the Allegheny Link. Families with children are asked to call the Allegheny Link if they do not have a safe place to stay that evening. Families are then placed in a unit that matches the household makeup, as capacity is available.

During times that the Allegheny Link is not operational, there is a triage system that directs callers to a variety of options based on their situation. All the programs listed can assist people during off-hours as space is available, independently from the operational hours of Allegheny Link. As households present to single shelter during times outside of the normal hours of operation of the Allegheny Link, shelters can serve the households, as capacity allows, and connect the households to the Allegheny Link for further assessment and screening. Families that call in during this time are triaged to an after-hours answers service that will discuss further options for diversion and connect to one of our family shelters for a potential one-night stay in an overflow space if it is vacant.

### ***Prevention Services and Rental Assistance***

For Prevention [Homeless Assistance Program (HAP) and Emergency Solutions Grant (ESG)] funding a household is prioritized when they receive a magistrate notice reporting that there has been an eviction filed. Placement on the waitlist does not guarantee assistance.

HAP homeless prevention funding can potentially be provided to households that have a notice from a magisterial district court, judgement, or order for possession. Households without minor children must be at or below 200% FPL. Households must demonstrate the ability to sustain the rent moving forward. The landlord or property manager must agree to receive funds from a 3<sup>rd</sup> party.

ESG homeless prevention funding can potentially be provided to households that have a notice from the magisterial district court or an order for possession and are not more than 6 months of rent delinquent. Households must be at or below 30% AMI. Funding can pay rent moving forward is the situation is deemed eligible and applicable for that level of assistance. The landlord or property manager must agree to receive funds from a 3<sup>rd</sup> party.

HAP rental assistance funding can potentially be provided to households that meet the CoC level of homelessness (literally street homeless, staying in a place not meant for habitation, staying in an emergency shelter, or fleeing domestic violence). Households must have an



intent to rent and/or signed lease, must have the ability to sustain the rent moving forward. Housing Stabilization Program funding is also available to households looking to access homelessness prevention or rental assistance funding within the CoC. This funding is available to those who are residing within the City of Pittsburgh. This funding is flexible in that it can be used prior to households receiving a magistrate notice. Households must be at or below 50% AMI and this can be used only every 5 years. It has a maximum assistance amount of \$6000 and can be used for forward rent if the situation is deemed eligible and applicable for that level of assistance.

### ***Marketing, Equal Access, and Accessibility***

The Allegheny County CoC, the CES, and providers do not discriminate against any individual or household, regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity or marital status. All people, regardless of their inclusion in different populations and subpopulations, including people experiencing chronic homelessness, veterans, families with children, youth, and survivors of domestic violence (DV), have fair and equal access to the coordinated entry process. These policies are monitored through the referral and denial process, as noted below.

All CoC providers must have non-discrimination policies in place and assertively outreach to people least likely to engage in the homeless system. All CoC providers must comply with all federal statutes including the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of Civil Rights Act and Title II and III of the Americans with Disabilities Act (ADA).

The implementation of Coordinated Entry through a central phone number and drop-in centers has greatly improved equal access to the homeless system. The phone number is toll-free and is operated and staffed 8am-7pm. During off-hours and weekends, a messaging service prompts callers to designated emergency housing services that have specialized protocols for those times. The drop-in center is in downtown Pittsburgh and is accessible by numerous bus routes. The path of access to the building and the building is fully ADA accessible. For those individuals and families who are unable or unwilling to access CE through walking in or by phone, CE utilizes the OCS Field Unit who go into the streets, shelters, and warming/drop-in centers to assist people where they are most comfortable. Additionally, the Allegheny Link and OCS Field Unit utilize language translation services (including ASL) that are “on demand” for people attempting to access Coordinated Entry for whom English is not the primary or preferred language. Specific steps to market the CE system include, but are not limited to:

- CE staff attend meetings and community events to explain and market access to the homeless system. These engagements include the Peoples Universal Service Advisory Group, Allegheny County Local Housing Options Team (LHOT), Allegheny County

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Disability Task Force, and other meeting that serve people with disabilities, racial and sexual minorities, and other protected classes.

- Materials and resources are posted at the local libraries and County Assistance Offices (SNAP, Medicaid and TANF enrollment sites), and many other service locations within the community.
- The Allegheny Link also has a prominent presence on the websites of both the Allegheny County Department of Human Services and the Homeless Advisory Board (HAB). CE policies and resources are posted on this website.
- Regular email updates to the general community, service providers, and City & County departments will be shared as needed.
- Educating mainstream service providers about how to connect households to CE

### ***Safety Planning for Those Fleeing Domestic Violence/Intimate Partner Violence (DV/IPV)***

Collaborating with the CoC's VAWA-funded agencies, DV/IPV trainings are provided to CE staff on a rolling basis, including training on identification, intervention, referrals, and safety issues. Additionally, the coordinated entry staff receive trauma informed care and mental health first aid trainings. CE staff assisting survivors of domestic violence confirm that a safety plan is in place; if not, immediate safety issues are discussed, and the client is directly connected to a domestic violence provider for ongoing safety planning. CE staff ensure that the client can share information safely during the contact and are transparent about information collection and storage.

### **Privacy**

The Allegheny Link and the OCS Field Unit obtain consent to share information for purposes of assessing and referring households through the CE process. Clients decide what information they provide during the assessment process without retribution or limited access to assistance. Services will not be denied if the client refuses to provide certain pieces of information, unless the information is necessary to establish or document program eligibility per the applicable program regulation, or Federal statute requires collection, use, storage, and reporting of personally identifying information as a condition of program participation. Households are not asked or required to disclose specific disabilities or diagnosis, and an individual may refuse to disclose any information, however based on program criteria, e.g., a long-term disability is required for permanent supportive housing, refusing disclosure of certain information may limit the options for services that they are eligible for. Those participating in CE are informed of the ability to file a complaint through the grievance process, which includes contacting the Director's Action Line (DAL). The DAL resides within DHS' Office of Equity and Engagement (OEE) and provides those served by DHS, and the CoC, easy access to a specialist who resolve concerns, misunderstandings, and complaints regarding services provided through DHS.

# ASSESSMENT

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## Standardized Access and Assessment Tool

When any household contacts that Allegheny Link or OCS Field Unit, further known as CE service coordinators, and indicates they are experiencing a housing crisis, staff first complete an initial screening for services. To prevent and divert people from entering the homeless system, skilled CE service coordinators will do a thorough review of all public benefit programs for which an individual may qualify. These programs include, but are not limited to:

- Housing Resources (Affordable, Subsidized, Accessible, etc.)
- Food Assistance (Food Pantries, SNAP Benefits, Produce to People)
- Utility Assistance (Universal Services, Dollar Energy, LIHEAP)
- Health Insurance (Medical Assistance, Medicare Savings Programs, Rx Programs)
- Transportation Programs (Medical Assistance Transportation Program, ACCESS)
- Employment/Income Assistance (CareerLink, Office of Vocational Rehabilitation, SOAR, TANF)
- Behavioral Health Services (Mental Health & Drug and Alcohol Services)
- Documentation Replacement Services (Birth Certificates, SS Card, Photo ID)
- Tangible Goods (Furniture, Clothing, Baby Supplies, Appliances, etc)
- Home and Community Based Waiver Programs and Other In Home Services
- Home Visiting Programs for Caregivers (Pregnant or Have Young Children (0-6) (Maternal Child Health Programs, Early Head Start/Head Start, or Family Centers)

For households who do not have a safe place to stay that evening and/or are fleeing domestic violence, the following standardized assessment tool is used, and process is followed:

- Households must meet the CoC definition of homelessness (literally homeless or fleeing domestic violence)
- Households must complete all questions on the Allegheny Housing Assessment (AHA)
  - Eligibility + any additional AHA questions that are incorporated into one comprehensive assessment
- A Household can receive only 1 AHA score and 1 posting at any given time
  - This means that if they contact the Allegheny Link and their situation has changed (for example: hospitalized, incarcerated or had criminal involvement, relapsed, or had additional clean time in relation to their drug and alcohol issues,

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lost or reunified with children, household composition changed) staff will complete a new pre-screening assessment to better capture the full picture vulnerability at that point in time.

For households who are not being evicted, experiencing homelessness, or fleeing domestic violence, or receive a score that does not qualify them for a homeless housing program, but are without stable housing the following process is followed:

- Basic demographic information is collected
  - Questions relating to focusing/targeting of housing resources are included
- Are provided subsidized housing options (Housing Authorities) and affordable housing search resources.
  - Basic review of differences between subsidized and affordable housing
  - Explain housing search options (PA Housing Search, HUD.gov, Newspapers, Craig's List)
    - If the household does not have access to the internet public libraries are suggested and client is informed that PA Housing Search has a toll free # 1-877-428-8844. They can also pick up any listings at the Allegheny Link office.
- If interested, an Allegheny Link Affordable Housing Resource Packet ([Allegheny Link Affordable Housing Packet](#)) can be mailed, emailed, or picked up at office.
  - This packet is a “starter kit” for households beginning a housing search. It includes detailed housing authority information, how to search for affordable housing, rental tracking sheet, potential documentation required, potential landlord questions, legal assistance for housing issues, where to find furniture or household items, general financial assistance agencies, and utility company information.

For households who are in the process of being evicted for rental arrears, the following process is followed:

- Household completes a more limited prevention & eligibility assessment
- Household must be at the crisis point of magistrate notice to qualify for HAP referrals, while also being targeted for community resources
- Households must be at the crisis point of magistrate notice to qualify for ESG referrals, while also being targeted for community resources
- Household is targeted to one prevention program path specific to their situation to more efficiently alleviate their issue

Additionally:

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- All households are encouraged to be as open and honest as possible to get the most accurate assessment of their crises
- All households are read a disclaimer relating to the sharing of their information as a program that receives their referral will have access to their complete assessment to better coordinate services
- All households assessed for homeless services are provided the opportunity to receive a connection request to a Street Outreach team within the CoC
- All households assessed for homeless services that are pregnant or are caregivers of young children (age 0-6) are provided the opportunity to receive an assessment and direct connection to a Home Visiting Program (including, but not limited to: Maternal Child Health Programs through Allegheny County Health Department, Head Start/Early Head Start, Early Intervention Services, Family Centers)  
<https://www.alleghenycounty.us/Human-Services/About/Contact/Link/Home-Visiting.aspx>

# PRIORITIZATION

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The Allegheny County CoC prioritizes households experiencing homelessness within the CoC's geographic area for referral to housing and services. Priorities are consistent with CoC and ESG written standards approved by the HAB. All referrals to ESG and CoC funded programs flow through the Allegheny Link. There is a prioritized by-name list called the "Homeless Housing Waiting List" is kept within CE.

The Allegheny County CoC has adopted CPD-16-11, HUD's *Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing* (<https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/>), as well as the accompanying update CPD-17-01 (<https://www.hudexchange.info/resource/5208/notice-establishing-additional-requirements-for-a-continuum-of-care-centralized-or-coordinated-assessment-system/>). Additionally, the CoC has expanded the prioritization practices to the Rapid Rehousing, Bridge and Penn Free housing programs. Therefore, households designated as Chronically Homeless are prioritized throughout the entire system.

## MATCHING & REFERRALS

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### Vacancy Management Process

- When a provider has a vacancy in a program, they will contact the Homeless Resource Coordinator (HRC) via HMIS to request a referral.
- Once the HRC receives the request for a referral, the HRC will begin working down the prioritized list of eligible households. Each household will have a minimum of 3 attempts by each contact method. The HRC will attempt this contact through 3 business days.\*
- Once contacted, the HRC will re-prescreen the household for eligibility and explain the program offering the vacancy.
- When the referral is given to the provider, the client must be contacted within 1 business day.
- Family shelters must attempt contact a minimum of 3 times in 24 hours. All other programs must attempt contact a minimum of 3 times in 3 business days.
- Programs must try all contact phone numbers listed in the referral and email the household if an email address is listed in the referral. Every contact attempt must be documented with the date, time, and outcome.
- Thus, if there are 3 phone numbers listed for the household, each number must be contacted 3 times (a total of 9 phone calls).
- As soon as the household verbally expresses interest in the program, the referral status should be changed from Assigned to Accepted-Pending.

*\*The Homeless Resource Coordinator works with emergency shelters, street outreach programs, OCS Field Unit, warming centers, drop-in centers, and many other service providers within the community to assist in locating clients.*

### ***Clients' rights to decline a referral***

Clients have the right to decline a referral and specific programs based on their needs and preferences. Client declining a referral will not remove them from their waiting list if remain eligible for services. At the time of initial assessment, the CE informs clients that they cannot guarantee a timeline as to when a vacancy may become available. As part of a Crisis Response system, clients are encouraged to work with first availability to quickly resolve their housing crisis unless there are imminent safety concerns. As part of the referral to a program, the HRC informs the clients that they cannot guarantee a timeline as to when another vacancy may become available, if they were to decline it.



### Provider expectations for document collection for eligibility

- During the regular intake and enrollment process, a provider must verify proof of homelessness documentation.
- Once a participant is enrolled, the program has up to 45 days to collect all remaining documentation. The only exception is documentation of Chronic status. Participants can have up to 180 days for verification of their homeless timeline only. See: <https://www.hudexchange.info/resource/5182/sample-chronic-homelessness-documentation-checklist/> & <https://www.hudexchange.info/news/new-resources-on-documentation-of-chronic-homelessness/>
- If documentation cannot be produced within 45 days of enrollment, then the client may be removed from the program.

### Documents needed to verify priority populations

DHS requires that clients identified as part of certain priority populations have the required documentation to receive this priority. These priority populations and priority circumstances include:

- *Chronic homeless status*: Clients will need disability verification as well as documentation of homeless status continuously for 12 months (1 year) or 4 episodes of homelessness in three years. Programs must document according to the Recordkeeping Requirements established in HUD's Notice CPD-16-11, with third party verification preferred.
- *Length of homelessness*: Clients will need documentation of homeless status continuously for 12 months (1 year) or 4 episodes within the last three years adding up to 12 months or longer. Third party verification is preferred.
- *Transition Age Youth*: Single clients who are ages 18 to 24 with no minor children or other household members and households of all adults within ages 18-24 range with minor children and no other household members.
- *Domestic Violence*: Clients who are actively fleeing domestic violence can self-certify upon entrance into the program.
- *Veteran status*: Clients will need to provide proof of military service and documentation of their military discharge status upon entrance into the program.

### Referral Denials

If a program has completed the necessary steps to determine client eligibility (for example, contacting client, scheduling appointment, conducting interview, verifying required documentation) and the client is ineligible for any reason, their status on the bulletin board should be changed to “denied-pending” with a reason from the dropdown.

All denials will be reviewed by Coordinated Entry (CE) staff within the Allegheny Link or the OCS Field Unit. This denial will be sent to the CE staff who will review the denial within 1 business day and have 3 business days to provide a decision or advise on next steps to the program.

In all program types, except Emergency Shelters, Rental Assistance and Prevention programs, the vacant unit will electronically be held for the client until the denial is accepted by Coordinated Entry or the client has been enrolled. If this is the only vacancy in the program, the program will not be able to request any subsequent referrals until a decision is made by Coordinated Entry regarding the denial. If there are multiple vacancies, the program will be able to continue to work with the next assigned client(s) while the denied client’s status is reviewed.

#### **Reasons in HMIS for a program to deny a referral:**

- o Could not document homelessness
- o Missing documentation
- o Could not document Chronic Homelessness
- o Could not document veteran status
- o Income is over the income threshold
- o No contact after 3 attempts
- o No show
- o No longer interested in program
- o No longer homeless
- o Does not meet selection criteria (e.g., Change in household circumstance; is an imminent risk to the other clients or program staff; etc.)

### ***If Coordinated Entry staff approves a denial***

CE staff will review current program enrollment and recent contact with the Allegheny Link and other homeless service providers to determine if further follow up with the household is needed. Depending on the household's situation, CE staff will reach out to households to determine if they are still in need of homeless services. CE staff then either removes or maintains the household's other referrals. If a potential reassessment is needed CE staff will coordinate.

### ***If Coordinated Entry staff rejects a denial***

The referral status will change back to "Assigned" on the program's bulletin board and the program should continue to work with the household to reduce barriers to program enrollment. CE staff will communicate with the program on next steps.

### ***If the program disagrees with Coordinated Entry's final denial decision***

The program has the right to appeal the decision. The following steps outline the procedure for appealing Coordinated Entry denial rejections:

1. Programs that disagree with CE staff's decision to reject a denial must submit a request for appeal. Initially, it can be submitted electronically via email and then followed up with a letter on formal provider letterhead in the mail. The appeal request must include the following:
  - a. Name and Referral ID of the applicant.
  - b. Short summary of the denial process to date including date of original denial and CE decision; and
  - c. Short explanation of the reasons the program believes the CE decision to reject the denial should be overturned.

All appeals should be submitted to the DHS Homeless Program Appeal Panel (hereafter referred to as the "panel") by emailing Andrea Bustos, Administrator Resource Navigation and Community Supports, Office of Community Services (OCS) at [Andrea.Bustos@AlleghenyCounty.US](mailto:Andrea.Bustos@AlleghenyCounty.US) within 1 business day from the time of CE rejection of denial, and then followed by a letter to:

**Allegheny County Department of Human Services**

**DHS Homeless Program Appeal Panel**

**Attn: Andrea Bustos, Administrator (OCS)**

**One Smithfield Street, Pittsburgh, PA 15222**

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2. The DHS Homelessness Appeal Panel consists of the Department of Human Services leadership. After an appeal is requested, the panel will convene a meeting with the program staff who made the appeal (and others they choose to invite) and the CE staff who were involved in the initial denial decision. The meeting must be scheduled within 7 business days from the appeal.
3. At the appeal meeting, the program and the CE staff will each have an opportunity to present their reasons for denial/rejection of denial. The panel will also ask questions. If consensus on a decision can be reached at this meeting, the process may end at this step and the decision of the group will be documented in writing by the panel and sent to all parties involved.
4. If consensus cannot be reached during the appeal review meeting, the panel will have 72 hours to make a final decision. This decision will be documented in writing and submitted to all parties involved.
5. If the program does not agree with the final decision made by the panel, the program may file an administrative appeal through the Court of Common Pleas.

## DATA MANAGEMENT

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The Allegheny County CoC Allegheny Link (CE) Application & HMIS are administered by the Allegheny County Department of Human Services.

Before completing an AHA and submitting for placement on the Homeless Housing Waiting List all staff must obtain a verbal consent to share and store client information for the purposes of assessing and referring them through the Coordinated Entry system to a homeless housing provider.

The CoC will not deny services to any client based on that client's refusal to allow their data to be stored or shared.

Further information on data monitoring and HMIS can be found in the [Allegheny County HMIS Policies and Procedures Manual](#) and the [Allegheny County Bureau of Homeless Services Contract Specification Manual Overview](#).

## Allegheny County Homeless Continuum of Care: Additional Considerations for Eligibility

These programs below are treated as literally homeless for assessment purposes based on being an emergency shelter (non-CoC funded) or following emergency shelter eligibility:

- Auberle Host Homes
- Bethlehem Haven Medical Respite
- Community Human Services Medical Respite at Wood Street Commons
- Community Human Services Probation Beds at Wood Street Commons
- Community Human Services Safe Haven I&Q Space
- DHS Contracted Recovery Housing
  - East End Cooperative Ministry
  - Heuer House
- Family Promise Emergency Shelter
- Genesis of Pittsburgh
- Light of Life Family Emergency Shelter
- Pittsburgh Mercy Central Recovery Center (CRC)
- Proud Haven's Haven House
- resolve
- True T PGH Option-U Emergency Shelter

The following programs follow the institutionalization rule\*:

- Inpatient hospitalization
- Chartiers Center Diversion and Acute Stabilization (DAS)
- Pittsburgh Mercy DAS
- Turtlecreek Valley Community Services DAS
- Wesley Family Services DAS

*\*If experiencing homelessness prior to entry, will be there less than 90 days, and is expected to continue experiencing homelessness upon discharge. If not experiencing homelessness prior to entry, eligibility is day before discharge with no safe place to go.*