



Skagit County Coordinated Entry Policies and Procedures

July 2022

1. Overview and Purpose

The purpose of Coordinated Entry (CE) is to provide the quickest access to the most appropriate housing to every household experiencing or at-risk of homelessness through a standardized assessment and referral process.

The purpose of these CE policies and procedures is to promote CE processes that serve and build power for people disproportionately impacted by homelessness, and to ensure homelessness for all households is rare, brief and one time.

CE promotes system-wide coordination for a more effective and strategic response to homelessness. CE helps a crisis response system¹ transition from project-focused to person-focused. Through CE, systems can monitor an inventory of housing resources and ensure households are prioritized for available services based on need and vulnerability. Implementation of CE also provides crisis response systems with comprehensive data for planning and resource allocation.

In practice, CE aims to guide households experiencing a housing crisis through the crisis response system by providing immediate access to the most appropriate housing through a standardized assessment, prioritization, and referral process.

In January 2017, HUD released new requirements for CE ([CPD-17-01](#)). Homeless housing programs funded by the state Consolidated Homeless Grant (CHG), the federal Emergency Solutions Grant (ESG), and the Continuum of Care (CoC) grant must participate in CE, either as an access point or by accepting referrals into housing programs.

Participating programs must fill program openings exclusively through the CE and eliminate all side doors. Because the Commerce grantee is a county government in Skagit, homeless housing programs funded by local homeless housing surcharge revenue (local document recording fees) must also participate in CE. Victim Service providers are not required to participate in CE as an access point or by accepting referrals.

2. Governance

The Washington Balance of State (BoS) CE System has designated a governance structure that includes the following entities: Community CE Governing Entity, Community CE Access Point Organizations, BoS CoC CE Subcommittee, BoS CoC Steering Committee, and the Department of Commerce. Listed below are the Community CE Governing Entity. The BoS Steering Committee adopted this governance structure on July 2, 2020. The BoS Steering Committee welcomes continuous input and feedback and can adopt changes as necessary based on that feedback.

2.1 Governance Structure

Community CE Governing Entity

The CHG Lead Grantee is ultimately responsible for ensuring that CE is operational at the community level. The CHG Lead Grantee has final approval for community-based CE decisions. The CHG Lead

¹ In the Washington Balance of State CE Guidelines, *crisis response system* refers to all of the services and housing available in the lead CHG grantee's jurisdiction (i.e., county) for households who are experiencing a housing crisis. A county CE system incorporates all of the resources in their crisis response system.

Grantee will ensure that the Community CE Governing Entity accomplishes the following responsibilities, which may be delegated:

- Develops marketing/advertising plan
- Ensures development of community-based CE training to CE staff/assessors
 - Intake, assessment, local processes
- Provides oversight of community CE processes
- Community level policy development
- Community level policy approval and oversight
- Establishes community CE participation expectations in addition to CoC participation requirements
- Community Engagement: establishes and maintains buy-in from entire crisis response system, and continually gather feedback from the crisis response system to inform policies and procedures
- Planning and Change Management facilitates system design/re-design processes, with final approval from Commerce

Community CE Access Point Organizations

- Day to Day workflow (intake, assessment, and referral processes)
- Implements marketing/advertising plan developed by Community CE Governing Entity

BoS CoC CE Subcommittee

- Determines data collection and data quality expectations for the BoS CE process
- Provides feedback/input for annual CE evaluation
- As part of annual CE evaluation, collects feedback from people with lived experience with homelessness and crisis response system involvement
- Makes recommendations on CoC level policy development

BoS CoC Steering Committee

- CoC level policy approval and oversight

Department of Commerce

- Develops and delivers CE 101 Standard Onboarding training to CE staff/assessors
- Provides technical assistance and guidance around CE best practices and implementation of CE guidelines
- Conducts monitoring of community CE process (compliance with CE guidelines)
 - Monitoring plans prioritize communities at high-risk of non-compliance as determined by risk assessments.
 - Monitoring may result in community-level policy enforcement and technical assistance plans, in partnership with The Community CE Governing Entity. If the CE system is still out of compliance after the technical assistance, Commerce may move the Lead CHG Grantee into a probationary period. Consequences of non-compliance are outlined in the CHG terms and conditions.
 - Monitoring will include a review of the intake, assessment and referral processes, in partnership with all projects participating in the CE system.
- Provides final approval for data collection and data quality expectations for CE process

- Administers the Homeless Management Information System (HMIS)
- CoC level policy development and origination information
 - Assessment of HUD Compliance
- Establishes high-level participation requirements for participants at the community level
- Provides guidance and final approval on significant system design/re-design processes
- Plans and performs CE evaluation (CoC level) every 2 years and identifies policy and process improvements. CE Evaluation must include:
 - Collection of information and feedback from participating projects and project participants (e.g. survey, focus groups, involvement in meetings, etc.)
 - Description of how project participants are selected to provide feedback
 - Documentation of adequate privacy protections of all household information collected throughout the evaluation process
 - Description of the process by which the evaluation is used to implement updates to existing policies and procedures
 - Documentation of the evaluation results

2.1 Governance Composition

BoS CE Subcommittee Composition

The membership of the BoS CE Subcommittee must reflect a balance of people with lived experience of homelessness and homeless Crisis Response System representatives. In order to have meaningful representation, the BoS CE Subcommittee should have 30 percent, but no less than three, of its membership be people with experience of homelessness. Additionally, the BoS CE Subcommittee should be demographically representative of the homeless population particularly in terms of race, ethnicity, gender identity, sexual orientation and geographic location.

Community CE Governing Entity Composition

Community Level CE governance in Skagit County includes, among other access points and CE providers:

- Skagit County (the County) as Lead CHG Grantee
- Community Action of Skagit County (Community Action) as Lead CE Agency
- Skagit Domestic Violence and Sexual Assault Services (DVSAS) as Victim Service Provider Partnership

In order to establish and maintain buy-in from the community, The Community CE Governing Entity will engage the following groups:

- Representatives of organizations that refer to from the CE system on a regular basis.
- Representatives of organizations that accept referrals from the CE system on a regular basis.
- Representatives of each Community CE Access Point Organization.

2.2 Community Engagement

The Community CE governing entity will make a meaningful effort to elicit the partnership and/or advice of the local Tribes and Nations, and by and for/culturally specific organizations. These important partners have not typically been involved in the development or implementation of CE processes.

These entities must be engaged in a thoughtful and meaningful way. The involvement of these entities in the development of equitable CE processes in your community is crucial in moving forward with

changes that create access for disproportionately impacted homeless people. The intention behind involving these entities is not to check a box, but to make meaningful changes to our community's response to homelessness.

2.3 Compensation

If they are not otherwise compensated by their employer to participate, the Community CE governing body must offer compensation for their time.

3. Victim Services

Survivors of violence and people fleeing violence are people who have experienced, or are currently experiencing, domestic violence, dating violence, sexual assault, stalking, trafficking or other dangerous or life-threatening conditions that relate to violence against an individual or a family member. Currently fleeing violence means fleeing or attempting to flee the situation or afraid to return to their primary nighttime residence.

Victim Service providers are not required to participate in CE as an access point or by accepting referrals.

Whether or not a victim service provider participates in the Coordinated Entry System, the CE governing body must consult and incorporate guidance from all relevant victim service providers when developing policies and procedures. This is to ensure accessibility, safety, and confidentiality for households who are fleeing, or attempting to flee, violence (domestic violence, dating violence, sexual assault, stalking, or trafficking).

At a minimum, the CE governing body will partner with all relevant victim service providers to develop and implement the policies and procedures listed below.

- A process to guide the operation of CE to address the needs of households who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or trafficking, but who are seeking shelter or services from non-victim specific providers.
- A process to ensure this population has safe and confidential access to CE.
- A process to ensure immediate access to emergency services such as domestic violence helplines and shelter.

Victim service providers must also meet the requirements established by [Washington Administrative Code Chapter 388-61A](#).

4. CE Participation

Projects should refer to funding guidelines to determine whether participation in CE is required. The following fund sources are typically required to participate in CE:

- Consolidated Homeless Grant (CHG), includes Housing and Essential Needs (HEN)
- Federal Emergency Solutions Grant (ESG)
- Federal Continuum of Care (CoC) Program
- Federal HOME Tenant-Based Rental Assistance (TBRA)

Because the County is the Lead Grantee, homeless housing projects funded by local document recording fees must also participate in the CE system.

Projects that are required to participate in CE must act as an access point or by accepting referrals. Participating projects accepting referrals must fill openings exclusively through the CE system and eliminate all side doors.

Additionally, all projects participating in CE must adopt and follow all CE policies and procedures.

The County is responsible for ensuring that grantees are participating in CE. If a grantee is not participating, it is up to County to enforce participation and take further action if necessary.

5. Accessing the CE System

CE must be available to all households regardless of actual or perceived race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity, marital status, and U.S. residency status.

5.1 High Accessibility

The CE system is highly accessible, and must adhere to state, federal, and local anti-discrimination laws. Households cannot be screened out based on the following criteria:

- Having too little or no income
- Having poor credit or financial history
- Having poor or lack of rental history
- Having involvement with the criminal justice system
- Having active or history of alcohol and/or substance use
- Having a history of victimization
 - Information about a person’s history of victimization shall be kept confidential and may not be used against them
 - CE processes may not require “proof” or documentation to determine whether a person has a history of victimization or not
- The type or extent of disability-related services or supports that are needed
- Previous system involvement
 - No turning away of a person regardless of the number of times they have accessed services.
 - Lacking ID
- Lacking proof of U.S. Residency Status
- Other behaviors perceived as indicating a lack of “housing readiness,” including perceived resistance to receiving services/ “bad attitude” or lack of ability to demonstrate they will be successful on the program

5.2 Accessibility for People with Disabilities

CE provides and ensures the following accessibility components:

- Ensures access points are fully accessible, including accessible physical locations for individuals who use wheelchairs, as well as a plan to offer reasonable accommodation as needed (e.g., a different access point, telephone number, or online access).

- Access points, if physical locations, are sited in proximity to public transportation and other mainstream services or offer some variation to the assessment process. For example, a person with a mobility impairment may request a reasonable accommodation in order to complete the CE intake and assessment process at a different location.
- Provides effective communication with individuals with disabilities.

5.3 Language Access

As the front door to homeless system services, it is critical that CE processes be fully available to all community members, including people who have limited English proficiency (LEP.)

In 2021, Community Action identified that Spanish (83%) and indigenous Mexican or Central American languages (10%), such as Mixtec or Triqui, as the primary languages among current and perspective clients seeking services.²

To improve CE system capacity and to provide meaningful access to individuals with limited English proficiency, CE provides will adhere to the following language access plan.

5.4 Language Access Plan

All CE Access Points will prioritize hiring and retaining at least one Spanish speaking staff member that will be available as a point of contact and to work directly with Spanish speaking clients. CE Access Point Staff will be trained to access interpreter services, or if access points are not contracted with interpreter services, to coordinate service delivery with Community Action.

Community Action will strive to meet the needs of LEP individuals seeking services through these processes:

- The service screeners for all main agency phone and program lines are fluent in both Spanish and English.
- Resource Center staff who serve all walk-in clients with connections to community resources, Critical Needs vouchers and bus passes are all fluent in Spanish and English.
- Community Action contracts with an Over the Phone Interpreter service. The Language Exchange offers interpreter support in over 7000 languages and dialects. They also offer ASL and Deaf/Blind interpreter support, among other signed languages.
 - Any staff member at Community Action can access interpreter services on behalf of their client. This service offers scheduled appointments for rare languages, regular client meetings as well as on-demand interpretation for almost all languages. Staff can utilize this service to leave messages for their client as well as call with an interpreter on the line.
 - Service screeners are trained to ask what language a client prefers before connecting them with the program and staff member who will be able to assist them, so that staff can contact an interpreter if needed.
 - The Language Exchange offers in-person interpreter service, but the over-the-phone interpretation is utilized the most by staff. Having an interpreter on the phone for an in-person meeting allows appointments for services to be scheduled without delay. In person interpreter services can also be scheduled if needed.

Community Action also develop notices to advertise the availability of services. Future trainings will also integrate accessing interpreter services as part of CE training protocol. An implementation plan for future trainings and evaluation of the LAP are outlined below.

² Excerpted from Community Action's FY 2020-21 Comprehensive Demographic and Client Services Dashboard

Implementation Plan for 2022/2023

Language Access Measure	Timeline
<p>Translation of vital program documents into languages other than Spanish</p> <p>Commerce can also assist with language access by translating any Commerce required public facing forms into multiple languages and can assist grantees with translation of other written materials as requested.</p>	<p>July 2022</p> <p>Ongoing</p>
<p>Train CE Access Point Staff on LAP Access and Services.</p> <p>Commerce will provide training and technical assistance opportunities for Access Points, CE Leads and CHG Leads</p>	<p>Semiannually, first training August 2022</p> <p>Ongoing</p>
<p>Evaluation. CE system will monitor and update its plan, policies and procedures to ensure that needs are met and that there is a framework for continuous quality improvement</p>	<p>Annually</p>

CE materials and participant instruction are available in multiple languages to meet the varying needs of those who speak other languages, have LEP, and/or have limited literacy abilities.

- Access points that do not assess certain populations will immediately refer those households to an appropriate CE access point. Households included in more than one population for which an access point is dedicated (for example a youth who is fleeing domestic violence) must be served at whichever access point they choose, so long as they qualify as a target population.

5.4 Marketing

Community Action is responsible for developing and distributing CE flyers, brochures, and other outreach to community partners to ensure the CE is available to all eligible households regardless of actual or perceived race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity, or marital status, including those least likely to access homeless assistance.

The CE advertises access points to all eligible persons, mainstream systems of care, and other community partners within all of Skagit County.

When marketing in any manner, the following information should be included:

- Access point hours of operation
- Languages spoken in house and/or language line availability
- How CE is available, such as by phone, online portal, mobile outreach, etc.

5.5 Emergency Services

Information about how to access emergency services is available independent of the operating hours of the CE. Emergency services may include domestic violence shelters and emergency services hotlines, drop-in service programs, and emergency shelters, including domestic violence shelters and other short-term crisis residential programs.

Emergency services are not required to be prioritized.

5.6 Street Outreach

Street outreach efforts must be linked to CE either as street outreach as a defined access point, or training outreach staff to provide referrals to CE. Policies and procedures must describe how street outreach efforts are linked to CE.

6. Prioritization Policy and Process

The Community CE Governing Entity is responsible for establishing and implementing a system-wide prioritization policy.

CE must have a prioritization policy that describes who is considered in priority status. Prioritization identifies which households will receive accelerated assistance to available housing resources.

6.1 Adults and Families Experiencing Homelessness

The criteria used to determine prioritization for adults and families experiencing homelessness includes the following factors:

- Chronic homelessness as defined by HUD
- Length of time homeless
- Unsheltered homelessness, including people fleeing violence

The prioritization process also takes into account:

- Chronic health conditions
- Threats to safety, including vulnerability to victimization, physical assault, trafficking or sex work
- Unmet health needs and/or significant challenges or functional impairments, including physical, mental, developmental, or behavioral health disabilities, regardless of time of disability, which require a significant level of support in order to maintain stability (Does not need to be documented or have a formal diagnosis)
- High utilization of crisis or emergency services to meet basic needs.
- Risk of continued homelessness
- Significant challenges to accessing housing in regard to protected class traits like race, gender, religion, age or sexual orientation
- Other factors which may determine greatest need.

Prioritization is a process separate from determination of eligibility and involves prioritizing eligible households for available housing resources, including transitional housing, permanent supportive housing, rapid re-housing, and prevention assistance.

Policies and procedures must ensure that if a household is prioritized for one type of housing intervention, it does not exclude the household from another type of intervention. For instance, if a household is prioritized for permanent supportive housing, but there are no units available, that household should be served with the first available intervention for which the household is eligible.

Households seeking assistance and household's service providers are given an opportunity to give information, which should be considered in prioritization decisions. Assessment tools alone may not capture all the information necessary to determine vulnerability. However, only information relevant to prioritization factors established in CE policies and procedures may be used to make prioritization decisions.

Households may appeal referral and prioritization decisions by following grievance procedures in section 10.1 Grievance and Appeals Process.

7. Assessment

The assessment process is how CE gathers information about a household experiencing a housing crisis. Information gathered includes household needs, housing preferences, barriers to housing stability, and factors that might indicate vulnerability while homeless.

The CE intake assessment is the standardized tool used to collect information about a household. Examples of the information assessments collect, include household make up, housing history, income and benefits, employment history, legal history, health considerations, and housing goals and preferences.

Once a household assessment is completed, the information collected is analyzed in the context of the CE prioritization policies. People with the highest priority are offered services first. This information is collected to determine a strategy to solve the housing crisis and informs the uniform prioritization process.

In all instances, the assessment process should only gather the information necessary to determine need and best match for housing services and done in a phased approach. Asking unnecessary questions while someone is in crisis may not always get the right results or may traumatize/re-traumatize them.

7.1 Assessment Standards

The assessment process gathers all information necessary to make prioritization decisions and is based on the prioritization criteria as defined by the CE prioritization policy.

All households entering the CE must complete an CE intake assessment that is used to inform a uniform prioritization process. Households with the greatest need are prioritized and matched with services that will help them quickly exit homelessness. The CE abides by the following assessment standards:

1. The assessment process aims to determine which households have the greatest need, and all factors included in the assessment are based on the greatest need.
2. Policies and procedures must include assessment information, factors, and documentation of the criteria used for uniform decision-making across access points and staff.
3. Different assessment processes may be used for the following populations:

- Households with children
 - Single adults
 - Households fleeing domestic violence, dating violence, sexual assault, stalking, trafficking, or other dangerous or life-threatening conditions.
 - Youth and young adults. For information, see the Department of [Commerce Office of Homeless Youth](#).
 - Veterans
4. Households at risk of homelessness will be matched with diversion and prevention services.
 5. Assessment tools must be used consistently at all access points to achieve fair, equitable, and equal access to services within the community.
 - Each subpopulation must be assessed in the same way at each access point they are served.
 6. The CE is prohibited from denying assessment or services to a household if the household refuses to provide certain pieces of information unless the information is necessary to establish or document program eligibility.
 7. Policies and procedures detailing assessment and prioritization processes must be publicly available.

A Note on Assessment Tool Development

Commerce does not recommend any established assessment or prioritization tool. Locally developed tools should be co-created with people with lived experience of homelessness and system involvement.

7.2 Phased Assessments

Access Points in the CE will implement a phased assessment approach to working with households as necessary. This approach allows for household information collected in phases, obtaining only what is needed to connect households to appropriate interventions and make prioritization decisions.

Basic Phased Assessment Components include:

- **Crisis Needs Assessment:** screening to defining the nature of the current crisis helps to ensure the person's immediate safety. The outcome of a crisis needs assessment could include a referral to an emergency service such as victim service provider, another community resource or continuing to the next phase of the assessment process.
 - Do you have a safe place tonight?
 - Are you in danger or do you need protection from violence?
- **Diversion & Problem Solving:** identify options and help access natural supports. The outcome of a diversion and problem solving could include a creative short-term plan other than entering the homeless crisis response system.
 - Do you have safe friends and family where you can stay?
 - Do you need help with mediation to stay where you are?
 - Can flexible funding help you stay where you are?

- **Housing Needs Assessment:** when it becomes clear that diversion and self-resolution will not occur, move to asking questions that gather the basic information needed to make eligibility, prioritization and referral decisions.

7.3 Phone and Virtual Assessment

Community CE Governing Entity encourages access points to make phone or virtual assessments available as part their CE process intake process.

For access points who conducting phone or virtual assessments should advertise this as described in section 5, Accessing the CE System and section 5.4 Marketing.

7.4 HMIS Telephonic Consent

Telephonic consent for HMIS entry is allowable. Telephonic consent from the individual may temporarily substitute written consent provided that written consent is obtained at the first time the individual is physically present at the agency. If someone provides telephonic consent and is never seen in person, it is fine to keep that record as consenting in HMIS. There are no documentation requirements, although telephonic consent can be noted in the client file, and you can utilize the public alerts under the client notes section in HMI.

To obtain informed consent, use the Client Release of Information and Informed Consent form as a conversation guide: <https://www.commerce.wa.gov/wp-content/uploads/2018/06/hau-hmis-informed-consent-form-2018.pdf>

Telephonic consent is not required of people who will have anonymous records. Clients who are:

- In DV agencies or
- Currently fleeing or in danger from a domestic violence, dating violence, sexual assault or stalking situation or
- Are being served in a program that requires disclosure of HIV/AIDS status (i.e.; HOPWA) or
- Under 13 years old with no parent or guardian available to consent to enter the minor’s information in HMIS.

8. Required Training

To ensure uniform services, the following basic trainings are required for all CE staff that have direct contact with clients.

At a minimum, complete the following on-demand online trainings before providing direct client services:

- Intro into Problem Solving (Diversion)
- Working with Survivors of Domestic Violence
- Intro into Housing First
- Progressive Engagement

The following trainings are live virtual trainings offered several times a year at no cost to BoS CE staff. CE staff should complete these trainings in the first year of employment:

- Mental Health Training
- Trauma Training 1 & 2
- Racial Equity in Homeless Services
- LGBTQ+ Informed Training

You can find all training information at the Commerce website:

[Training - Washington State Department of Commerce](#)

8.1 Commerce CE Training

The Commerce CE Performance Specialist develops and delivers CE 101 Standard Onboarding training to CE staff/assessors.

CE 101 Standard Onboarding training will be offered quarterly starting January 2022, and will cover the high level components of Coordinated Entry such as definition of CE, and the four core elements: access, assessment, prioritization and referral.

The CE 101 Standard Onboarding training will be developed and updated in collaboration with the BoS CE Subcommittee.

8.2 Community Based CE Training

All staff administering assessments will receive training annually. Training may be in person, a live or recorded online session, or reading material.

The training curricula must include the following topics for CE staff:

- Review of local processes, including CE policies and procedures, and any adopted variations for specific subpopulations
- How to administer properly an intake assessment.
- How to use assessment information to determine prioritization
- Criteria for uniform decision-making and referrals

9. Referrals

The referral process matches households with available resources that will best help households quickly exit homelessness. CE must implement a uniform and coordinated referral process for all beds, units and services available at participating projects.

CE must maintain up-to-date information on project capacities, vacancies and eligibility criteria. The Resource Center Program Manager at Community Action updates and maintains this information using the HMIS system and continually checking in with providers.

9.1 Referral Rejections

- Referral rejections by providers must be justified, rejected households must be informed by the provider of programs for which they are eligible and informed of conditions to remain on the Housing Interest Pool.

- When a provider rejects a household, the provider must communicate the reason for rejection to the household, and the household must be told of other services.
- If a provider rejects a household for reasons beyond the household's eligibility for the program, the provider must notify the Coordinated Entry Coordinator/Housing Resource Coordinator.
- Policies and procedures that specify the conditions for households to maintain their place in CE prioritization lists when households reject a referral. Households have the right to reject housing and service options without retribution or limiting their access to other forms of assistance.

9.2 Prioritization Lists

For a household to maintain their place on the CE prioritization lists they must check in monthly with Housing Resources Center staff at Community Action. As long as the household remains eligible for CE (literally homeless or imminent risk of homelessness) and continues to check in monthly they will be active in the Housing Interest Pool. Households that do not check in within sixty (60) days or longer, may be taken of the Housing Interest Pool. Staff conducting an CE intake share the conditions for households to maintain their place on CE prioritization list as part of the intake process.

Clients check ins can happen in-person at the Housing Resource Center, over the phone or through street outreach specialists. A check in includes update to the client's current contact info, where they slept last night, monthly income, if they are interested in shelter referrals, and any other update.

Households have the right to reject housing and service options without retribution or limiting their access to other forms of assistance.

The CE must take a dynamic prioritization approach that considers a household's prioritization status and current resource availability. This approach requires CE to anticipate upcoming resource availability (e.g. next 60 days.) For example, the assessment process may determine that a household with a high level of need would be a good fit for PSH. However, PSH resources will not be available for 60+ days. In this case, refer the household to an available intervention, such as RRH, rather than waiting a long period for a PS opening. This approach maximizes the resources available within the crisis response system and keeps wait time down for the highest need households.

10. Household Protections

10.1 Grievance and Appeal Process

CE Requires that households will be notified of their right to submit grievances and in what manner they can submit grievances, including nondiscrimination and equal access complaints. All CE points of entry should provide households with grievance procedures at the time of intake.

Any household seeking services through the Skagit County CE has the right to file a grievance if it has been denied service. Grievances should follow the grievance policy implemented by the Lead CE Agency, Community Action. All CE grievance and appeal processes must be implemented consistently at all CE access points.

If clients do not feel comfortable filing a grievance with an individual agency, or if the client has a system-level grievance, they can contact Peter Miterko, Skagit County Public Health Community Health Coordinator, via phone at 360-416-1504 or via email at peterm@co.skagit.wa.us. Complaints may also

be made in person at 700 South Second Street, 3rd floor, Mount Vernon, WA 98273. Complaints can be made in any language, and Skagit County will provide translation services if needed.

10.2 Privacy

Household consent will be obtained to share and store household information for purposes of assessing and referring households through CE. All CE providers must follow HMIS data privacy and security protections prescribed by HUD for HMIS practices in the HMIS Data and Technical Standards.

If the CE maintains a prioritization list outside of HMIS, they must extend the same HMIS data privacy and security protections prescribed by HUD for HMIS practices in the HMIS Data and Technical Standards.

CE will not deny assessment or services to a household if the household refuses to provide certain pieces of information.

- If the information is necessary to establish or document program eligibility per the applicable program regulation, and a household refuses to provide the information, a problem-solving conversation should still occur.
- CE must not deny services to households if sharing data is refused unless federal statute requires collection, use, storage and reporting of a household's personally identifiable information as a condition of program participation.
- Records containing personally identifying information must be kept secure and confidential.
- CE must do everything in their power to protect the confidentiality and privacy of persons fleeing violence and their children, and must also refrain from engaging in activities that compromise their safety.
- The assessment process does not require disclosure of immigration status or citizenship.

10.3 Non-Discrimination

CE complies with all applicable civil rights and fair housing laws and requirements. All CE points of entry shall post their intake policies where clients can see them, and shall inform clients of their non-discrimination rights at the time of intake. CE complies with the nondiscrimination and equal opportunity provisions of federal civil rights laws as specified at 24 CFR 5.15(a), including, but not limited to, the following:

- Fair Housing Act prohibits discriminatory housing practices (including but not limited to "steering" participants towards any particular housing facility or neighborhood) based on actual or perceived race, color, U.S. residency status¹¹, religion, sex, age, familial status, disability, sexual orientation, gender identity or marital status.
- Section 504 of the Rehabilitation Act prohibits discrimination because of disability under any program or activity receiving federal financial assistance.
- Title VI of the Civil Rights Act prohibits discrimination because of race, color, or national origin under any program or activity receiving federal financial assistance.
- Title II of the Americans with Disabilities Act prohibits public entities, which includes state and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing-related services such as housing search and referral assistance.
- Title III of the Americans with Disabilities Act prohibits private entities that own, lease and operate places of public accommodation, which include shelters, social service establishments

and other public accommodations providing housing, from discriminating on because of disability.

- HUD's Equal Access Rule at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status, including any projects funded by the CoC Program, ESG Program, and HOPWA Program. The CoC Program interim rule also contains a fair housing provision at 24 CFR 578.93. For ESG, see 24 CFR 576.407(a) and (b), and for HOPWA, see 24 CFR 574.603.
- Washington Law Against Discrimination at Chapter 49.60 of the RCW declares that practices of discrimination against any of its inhabitants because of race, creed, color, national origin, families with children, sex, marital status, sexual orientation, age, honorably discharged veteran or military status, or the presence of any sensory, mental, or physical disability or the use of a trained dog guide or service animal by a person with a disability are a matter of state concern, that such discrimination threatens not only the rights and proper privileges of its inhabitants but menaces the institutions and foundation of a free democratic state.
- CE will not use data collected from the assessment process to discriminate or prioritize households for housing and services on a protected basis, such as actual or perceived race, color, national origin, religion, sex, age, familial status, disability, sexual orientation, gender identity or marital status, including those least likely to access homeless assistance.
- Households will not be denied access to the CE process on the basis that the household is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.