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Massachusetts Balance of State
Continuum of Care
MA-516

Coordinated Entry
Policies and Procedures



Contents

Introduction3

 What is Coordinated Entry?4

 Definitions4

 BoS CoC Regions.....6

Access6

 Coordinated Entry Eligibility6

 Homeless Status7

 Geographic Tie.....7

 Transitional Housing Participants9

 Individuals residing in an institutional setting outside of the BoS10

 Emergency Assistance (EA) Family Shelter Households11

 Verifying homelessness for CE eligibility11

 Rapid Re-housing Bridge13

 What provider should enter a household into the CE project14

 Alternate Portal15

Assessment16

 Steps of the CE enrollment process.....16

 Completing the CE enrollment process with households17

 Timeline for completing the CE enrollment process.....18

 Next steps after being added to CE project18

Prioritization19

 Score tiebreakers19

 Regionalization Policy (Region priority).....20

Referral23

 Identifying a household for referral23



Default Unit Size 24

Strikes..... 26

Regional Navigator referral steps 27

Post-referral timeline 29

Housing Provider’s role in referral process..... 30

Wheelchair accessible units 31

Other Policies and Procedures 32

 Domestic Violence Coordinated Entry (DV CE) project..... 32

 Referral steps for DV housing project vacancies 33

 Expectations for VSPs that run housing projects..... 34

 Removing households from the CE project 34

Appendix A: Region Breakdown..... 35

Appendix B: YHDP Region 37

Appendix C: RRH Start-Up Cost Only Pilot..... 37

Appendix D: Disabling condition documentation..... 38

Appendix E: Emergency Transfer Plan 41

Introduction

Below are the Policies and Procedures for the Massachusetts Balance of State (BoS) Continuum of Care’s (CoC) Coordinated Entry (CE) System. This document will be updated regularly when changes to the system are made and approved. The current version of these Policies and Procedures will be kept on the [Balance of State CoC page of the Mass.gov website](#). Please be sure to reference the document there to ensure you’re looking at the up-to-date version.

This document is structured to align with the four core pillars of Coordinated Entry identified by the Department of Housing and Urban Development (HUD):

1. Access



2. Assessment
3. Prioritization
4. Referral

What is Coordinated Entry?

HUD requires every CoC to establish and operate a CE system. The CE system is a centralized process for assessing, prioritizing, and referring homeless households to housing resources across the CoC geography. The process is standardized and implemented uniformly across the CoC, meaning households that enter the system through one provider will be considered for all housing resources that fill vacancies through CE.

A CE system allows for a regional vision of how to best support homeless households. With just one assessment, households are considered for a number of housing resources across the CoC, instead of needing to find projects one by one without knowing which projects they are eligible for and which are appropriate for their situation. Since this assessment is standardized across all providers, it allows the CoC to prioritize households based on who is most vulnerable in the region at large. This ensures that scarce resources are used as effectively as possible, and the households most in need of services are connected to the projects that can support them. The standardized assessment also incorporates participants' preferences, ensuring they gain access to the options that best address their needs.

The goal of a CE system is to move from a network of projects making individual decisions, to an integrated network of providers working together to serve the households most in need.

Definitions

- **CoC Supervisor** - EOHLC employee who oversees BoS CoC operations, programs, policies, and funding. They manage the EOHLC team that has direct engagement with CoC programs, subrecipients, and funded projects.
- **Coordinated Entry (CE) Lead** – EOHLC employee responsible for overseeing the overall CE system. They coordinate system-wide policies and procedures related to CE and work with the



Regional Navigators to ensure the CE system in each region is being implemented in accordance with those policies and procedures.

- **Contract Coordinator** – Each CoC project is paired with an EOHLC staff person who oversees the contract for their project. This individual is the point person for any questions related to the operation of a project.
- **Default Unit Size** – The number of bedrooms that a household is found eligible for by default, based on their household composition. A household can be housed in a unit of a different size in specific scenarios, outlined in the Default Unit Size section.
- **Domestic Violence Coordinated Entry (DV CE)** – This system runs parallel to the CE system and allows for households that are referred to CE by Victim Service Providers (VSPs) to be entered into the system without PII being included in their record. Once entered into the DV CE project in VESTA, these households are considered for DV-specific and mainstream projects.
- **Domestic Violence (DV) Specialist** – This individual is employed at the subrecipient agency that is contracted to operate the DV CE system. This role acts similarly to a Regional Navigator but works specifically with DV projects. They coordinate referrals to housing vacancies in DV projects, as well as coordinate with VSPs throughout the BoS to ensure VSPs can have households they work with entered into the DV CE project.
- **Household** – Refers to all individuals looking to live together in a housing placement. If someone is looking for housing on their own, they are a household of one.
- **Housing Provider** – The agency managing the operation of a housing program. This agency interfaces with program participants to enroll and support them throughout their participation in the program.
- **Regional Navigator** – Each of the four BoS CoC regions has an agency that is a subrecipient of the CoC's Coordinated Entry grant. As a CE subrecipient, these agencies are in charge of facilitating the CE system in their region. Each of these agencies is required to employ a Regional Navigator who is the point person for CE matters in their region. The Regional Navigator makes referrals to project vacancies, as well as supports providers in their region with general CE matters.
- **VESTA** – The HMIS database used by the Balance of State CoC.



- **VESTAmator** – A VESTA report that generates potential matches for housing project vacancies. Regional Navigators use this report to get the list of households to contact about openings.
- **YHDP** – The Youth Homelessness Demonstration Program (YHDP) is a HUD initiative designed to reduce the number of youth and young adults (YYA), who are age 18-24, experiencing homelessness. The goal of YHDP is to support selected communities in the development and implementation of a coordinated community approach to preventing and ending youth homelessness. YHDP projects are currently only offered in a select 32 communities (YHDP Region) across the BoS. A map of the YHDP region is included in [Appendix B](#).
- **Youth Navigator** – Youth Navigators serve a similar role to Regional Navigators, but do so specifically for the BoS CoC’s YHDP projects. They are in charge of referring households to vacancies in YHDP projects. In addition, they also provide Youth Navigation services to YHDP households.

BoS CoC Regions

Given that the BoS CoC covers a large area comprised of 115 communities in eastern Massachusetts, the CoC was split into four separate regions. Each region has a non-profit agency that helps manage the Coordinated Entry system within that region. Employed at each of those subrecipient agencies is a Regional Navigator who is the point person for CE matters within that region. The Regional Navigators ensure that the policies and procedures outlined in this document are being followed in their regions. A map of the different regions and lists of the communities in each region can be found in [Appendix A](#) at the end of this document.

Access

Coordinated Entry Eligibility

Two things must be considered when determining eligibility to be added to the Coordinated Entry project. In order to be eligible, a household must have both:

1. Eligible Homeless Status, **and**
2. Eligible Geographic Tie



Homeless Status

Below are the eligible homeless statuses that can make a household eligible to be added to the CE project. Please reference the linked HUD definitions for all details of the homeless definitions.

- **[HUD Category 1 homeless](#)** (“Literally homeless” in a shelter or place not meant for human habitation) – All households that meet the HUD Category 1 homeless definition have an eligible homeless status for the purpose of being added to the CE project
- **[HUD Category 2 homeless \(Imminent Risk of Homelessness\)](#)** – The BoS CoC has limited projects that can work with Category 2 households. At this time, they are limited to Youth Homelessness Demonstration Program (YHDP) projects. Therefore, in order to be eligible for the CE project, Category 2 households must
 1. Have a Head of Household that is aged 18-24 years *and*
 2. Have a tie to one of the YHDP communities (see [Appendix B for YHDP map](#)).
- **[HUD Category 4 homeless \(Fleeing/Attempting to Flee Domestic Violence\)](#)** - All households that meet the HUD Category 4 homeless definition have an eligible homeless status for the purpose of being added to the CE project

Geographic Tie

To access Balance of State resources, a household must exhibit that they have a tie to the [BoS CoC geography](#). Every homeless household is able to access resources of the CoC in which they are experiencing homelessness. Therefore, this tie requirement is to confirm that a household is accessing the correct CoC, and to ensure that the limited resources of the BoS CoC are serving the households that are homeless within our geography.

If a homeless household is experiencing homelessness within the BoS geography, they fulfill this geographic tie requirement. If the household is homeless and moving between multiple CoCs, they must be primarily residing within the BoS CoC (more than half of the time).



The BoS has decided that in rare situations, it makes sense for a household that is experiencing homelessness in a different CoC to access BoS resources, as well. If a household is experiencing homelessness in another CoC, they may be eligible for BoS resources if one of the below options is true:

- 1) Household had a permanent residence within the BoS geography within the past 5 years and desires to return to their community and support system.
 - a. Permanent residency is defined as a consistent location where they resided for at least 12 consecutive months.
 - b. Household will only be eligible to return to the region in which they previously lived, as eligibility is based on their need to return to their previous community.
 - c. Household will have to provide documentation to prove residency. Please see [Verification Requirements section](#) for approved forms of documentation.

- 2) Household does not qualify under the first category above, but household and household's provider believe there is good reason why they should have access to BoS resources.
 - a. In this event, the household and provider should work together to write a letter explaining the household's connection to the BoS geography and why they believe that connection justifies them accessing BoS resources. The letter should be submitted to the Regional Navigator of the region to which they believe they should have access.
 - b. The CE Committee will review the letter and make a recommendation of whether the household should be given access to BoS resources. The CoC Supervisor and CE Lead will make the final decision.

Geographic Tie requirement for households in DV CE project

The above policy applies to households in the Domestic Violence Coordinated Entry (DV CE) project, with a few differences:

1. Documentation about ties can be redacted to remove PII.
2. Documentation should be sent to the DV Specialist.



3. If the household and case manager are writing a letter making their case for accessing BoS resources (option 2 in Geographic Ties section), instead of being reviewed by the CE Committee, the case will be reviewed by the DV Specialist, DV Specialist's supervisor, CE Lead, and CoC supervisor. This is to protect the privacy of these households and limit the number of people who are reviewing.

Verification Requirements for Past Permanent Residency

- (1) Those claiming permanent residency in the Balance of State within the past 5 years must provide one of the following:
 - a. Lease agreement
 - b. Notice to Quit or other court documentation
 - c. Verification letter from a provider
 - d. Verification letter from a landlord

Transitional Housing Participants

A household that is in Transitional Housing (TH) for homeless individuals meets the HUD Category 1 homeless definition as long as the TH program meets HUD criteria for "Transitional Housing for homeless individuals". As such, they may remain active in the BoS CE project and be considered for housing vacancies in projects that fill through CE. Households in TH must still meet the eligibility criteria for projects they are referred to, and it is important to note that HUD states someone housed in TH does not meet the chronic homeless definition, regardless of their homeless status upon entry into that TH program.

Households enrolled in an approved TH program should not be exited from the CE project in VESTA. If a Transitional Housing project is listed on the BoS CoC's Housing Inventory Count (HIC), it is considered TH per the HUD definition. If it is not on the HIC, please contact the CE Lead. The EOHLC team will refer to guidance from HUD to determine if the program is Transitional Housing for homeless individuals, and as such if the household is eligible for CE.



If someone enrolled in an approved TH project is not already in CE, they can be added by the Regional Navigator through the Alternate Portal.

When a household from a non-CoC funded TH project is referred to a vacancy through CE, they will need to provide the Regional Navigator documentation of their homelessness upon entry into that TH project as well as documentation they are currently residing in that TH project.

A household residing in Transitional Housing and active in Coordinated Entry will not be referred to a different Transitional Housing project, in the event they are identified by the VESTAmator as the next household to be screened. The one exception is that households in a Crisis Transitional Housing project can be referred to another Transitional Housing project if they are screened.

Individuals residing in an institutional setting outside of the BoS

If an individual is staying in an institutional setting, and immediately upon entry into that institution they were Category 1 homeless, they retain their Category 1 status as long as their institutional stay is 90 days or less. If an individual in this scenario resides in an institution outside of the Balance of State geography, but they were homeless in the Balance of State geography immediately prior to entering that institution, the BoS considers this a qualifying geographic tie to the BoS.

To verify this, a provider within the Balance of State CoC geography must provide documentation of homelessness that shows the household was homeless within the BoS immediately prior to their institutional stay. If that documentation is provided, this meets the geographic tie eligibility requirement. However, if they are not able to secure this documentation from a provider located within the BoS CoC, they must follow the process outlined in the [Geographic Tie section](#) to request access to BoS resources.

When documentation is provided, the household will be entered into CE by the appropriate Regional Navigator through the [Alternate Portal](#).



Emergency Assistance (EA) Family Shelter Households

Households in the Emergency Assistance (EA) Family Shelter system are eligible to be added to the CE project provided they meet the geographic tie eligibility requirement, but the program types they are eligible for are limited. Because all EA households are eligible for HomeBASE funds to support with rental assistance, the BoS CoC has decided that EA households are not eligible for CoC, ESG, and YHDP-funded Rapid Re-housing (RRH).

EA households are eligible for PSH. The majority of PSH in the BoS CoC requires that the Head of Household (HoH) have a disabling condition. Therefore, EA households must have an adult member with a disabling condition in order to complete the CE enrollment process.

All EA sites located within the BoS CoC have a project in VESTA. In that project, staff can complete the [CE Quick Screen](#) with households at their site. If staff need to be trained to complete that process, they can contact the CE Lead.

Please note there are no restrictions on accessing CE or RRH for households with children that are not in EA shelter, as well as for households with children that are in DV shelters.

Verifying homelessness for CE eligibility

To be added to the CE project, a household's homelessness must be verified by a provider. Current enrollment in a VESTA Emergency Shelter or Street Outreach project is sufficient. Self-certifications are not sufficient documentation for entry into CE. Verifications of Homelessness from providers must include the following:

- Details about where the individual is currently sleeping (i.e. in a tent in woods behind Walmart, at Davis Square train station, etc) - these details confirm if household meets the HUD homeless definition
- Dates the provider knows the household to have been residing in the stated location
- Town/city where household is residing at night (for BoS geographic tie purposes)



- How/why the signer knows the household to be homeless (See section below)
- Title and agency of staff person verifying
- Signature of staff person verifying
- Date letter was written

How/why the signer knows the household to be homeless

An important part of the Verification of Homelessness is an explanation of how the verifying staff knows the household to be homeless. For Emergency Shelter (ES) and Street Outreach (SO) staff, please see the following:

- Emergency Shelter staff should list dates when the household resided in their shelter.
- Street Outreach staff should explain when and where they have physically observed a household to be residing in a place not meant for human habitation.

For non-ES or SO staff who know households to be homeless but have not physically observed where the household is residing, verifications must include the following:

- State that to the best of employee's knowledge and based on their professional judgment, the individual has been residing in a place not meant for human habitation at the time of their meetings. The written statement must detail the dates they met the household, the nature of those meetings, and why they believe the person was residing in a place not meant for human habitation. Please note simply stating that someone reports being homeless is not sufficient. The verification must speak to the provider's judgment on why, in their professional opinion, they know this household to be homeless (For example, a provider may reference meetings in their office where the individual brought suitcases with all their possessions with them, etc).

When a non-ES or SO provider writes a verification, they should also try to connect the household to an ES or SO team. In addition to connecting them with shelter or outreach resources, the aim of this is



to connect them with a provider that can provide strong homeless verifications in the event the household is screened for a housing opportunity.

Rapid Re-housing Bridge

The BoS CoC recognizes that not all households placed into Rapid Re-housing (RRH) programs will achieve housing self-sufficiency by the end of the program timeframe. As such, we have created a “bridge” structure through which households currently in RRH programs filled through the BoS CE system can be considered for openings in Permanent Supportive Housing (PSH) programs which are also filled through the BoS CE system. Staff at participating agencies will complete a training to be able to administer a Bridge Assessment form.

An agency administering RRH can complete a Bridge Assessment with a household if the household meets the following criteria:

- Actively enrolled in their RRH project, and
- The RRH project they are enrolled in fills vacancies through the BoS CoC CE system, and
- The participant has been identified by RRH program staff as a household they believe will not be able to achieve self-sufficiency in RRH and will need PSH, and
- Signed their initial lease in RRH program a minimum of 6 months ago (lease effective date).

The Bridge Assessment should be administered by a staff member who works in the RRH program. Staff people must be trained by the EOHLC team on how to administer this Bridge Assessment. They can reach out to the CE Lead to schedule training.

If the household scores high enough per the criteria on the Bridge Assessment, the household can be added back to the CE project to be considered for PSH opportunities. If the household scores high enough to be added back to the CE project, the staff person who administered the assessment should reach out to the CE Lead to notify them. The CE Lead will add the household back to the CE project with the CE Assessment score they had upon entry into RRH.



Given the scarcity of PSH units and the intention to prioritize those resources for the most vulnerable households in the CE project, at this time the BoS is not setting aside any PSH units to be used specifically for RRH-PSH bridge situations. Instead, if a household is added back to CE, they will be referred for PSH openings if their score places them high enough on the list.

While enrolled in a RRH program, clients maintain their chronic homeless status if they were chronically homeless upon entry into the program (time spent in RRH does not count as time homeless toward chronic homeless status). Therefore, households added back to the CE list through the RRH-PSH bridge will retain their chronic homeless status if they were chronically homeless upon entry into the RRH program. The case manager and household should be aware that the majority of PSH in the BoS requires a household meet the HUD chronic homeless definition to be considered eligible.

What provider should enter a household into the CE project

Eligible households are primarily added to the CE project by Street Outreach teams, Emergency shelter staff, or a Regional Navigator. Their path to entry depends mainly on their homeless status and the providers with whom they are currently engaged.

- **Category 1 homeless households:**

Households that are engaged with a VESTA-participating Street Outreach (SO) project or staying at a VESTA-participating Emergency Shelter (ES) must complete the CE process directly with that provider. When a Category 1 homeless household is not engaged with a VESTA-participating SO or ES project, they get added to the CE project by a Regional Navigator through the [Alternate Portal](#).

- ES teams should complete the CE Quick Screen with all guests to see if they score high enough to be added to the CE project. If they do screen in, staff should complete the [full CE Enrollment process](#) with those households as soon as possible.
- SO teams should complete the [full CE Enrollment process](#) with all households in their project.



- **Category 2 homeless households:**

The BoS CoC has limited programs that can support households that are Category 2 HUD homeless. They are all youth programs (individuals ages 18-24) and are part of our YHDP initiative. If a household is between the ages of 18-24, is Category 2 homeless, and has a tie to one of the 32 YHDP communities (see YHDP process document for more details), they should be connected with a Youth Navigator for further screening. If found eligible, these clients will be entered into CE by a Youth Navigator through the [Alternate Portal](#).

- **Category 4 homeless households:**

Category 4 households can enter CE through either a Victim Service Provider in the BoS who will complete a CE packet with them, or the Domestic Violence Specialist.

Alternate Portal

Recognizing that not all CE eligible households will already be engaged with a VESTA-participating SO or ES project, the BoS created the Alternate Portal. If a household presents at a homeless provider that doesn't have VESTA access, that provider can reach out to their Regional Navigator to have that client added to CE through the Alternate Portal.

Before adding a household to CE through the Alternate Portal, the Regional Navigator will first confirm eligibility and collect eligibility documentation (both homeless status as well as geographic tie). If the Regional Navigator finds that the household is eligible and receives documentation, they will set up a time with the client and their provider to complete the CE enrollment process. This can be done by phone or video call. Regional Navigators will ask that an existing provider join for the call so that the client has someone they know and are familiar with to navigate the process with them. The CE Enrollment process contain sensitive questions, so having someone present that the client knows is an important piece to consider.



Assessment

Steps of the CE enrollment process

A household must complete the following steps to be added to the CE project:

- Quick Screen – This short questionnaire aims to identify and screen in households that most need BoS housing resources. Given that housing resources are scarce, the BoS CoC is committed to preventing false hope for households that won't score high enough to be referred to resources. Those households with low scores on the Quick Screen that are more likely to self-resolve will be screened out and won't be added to the CE project. If a household scores 16 or higher on the Quick Screen, they move on to subsequent steps of the CE Enrollment. Households that are actively sleeping in a place not meant for human habitation will be given the maximum score on the Quick Screen and automatically screened into CE given the inherent vulnerability of sleeping in a place not meant for human habitation. Those households will still answer the Quick Screen questions in case they are sheltered in the future and their score needs to be calculated. Youth households (18-24 years old) and households that are fleeing or attempting to flee domestic violence will automatically screen into CE regardless of their Quick Screen score. The score of the Quick Screen is added to a household's ultimate CE Assessment score.
- CE project intake forms – These capture data elements required by HUD. The information is also helpful in determining for which projects households are eligible (e.g. is household chronically homeless, does household have a disabling condition, etc). The household's ultimate CE Assessment score will give points based on the length of time the household has been homeless, and those points are based on answers in the CE project intake forms.
- CE Assessment – This form has two main functions:
 - Calculate CE Assessment score – This form is the main part of the process that generates points for the ultimate CE Assessment score (in addition to Quick Screen score and time homeless score calculated from the CE project intake forms). Point generating questions on this form consider different factors contributing to a household's vulnerability. The total CE Assessment score calculated is then used to prioritize households for housing



vacancies. A household is prioritized for programs in order of their CE Assessment score.

- Collect information about housing preferences and needs – These questions capture information about what a household prefers and needs with regards to housing opportunities. This information is then considered when determining what placements a household should be referred to.

Completing the CE enrollment process with households

Staff that complete the CE enrollment process with eligible households must follow these guidelines:

- Explain questions to Head of Household and ensure understanding
- Do not attempt to influence answers
- Complete CE enrollment process with the household, recording the answers that the household provides
 - If a household says they have a disabling condition, the assessor should record that and let household know that if they are pulled for a housing opportunity, depending on eligibility criteria for that project they will need to provide documentation of that disabling condition from a clinician at that time in order to move forward. However, please note that no documentation is needed to answer “yes” to disabling condition questions at the time of the CE Enrollment.
 - If a client answers “No” to having a disabling condition, but you have verification from a licensed clinician confirming that the Head of Household does in fact have one, you can answer in line with the clinician's diagnosis. This can potentially increase the CE Assessment score, but the provider should remember that ultimately, the household may still be required to acknowledge and provide documentation of this disabling condition if pulled for a vacancy.
- If you have reason to believe a household is not being truthful in their answers in order to get a higher CE Assessment score, engage the household in conversation and explain the importance of accurate answers.



- Ensure households understand that answers to the Housing Needs and Preferences section of the CE Assessment will be considered with regards to what opportunities they are offered. They will only be considered for the types of housing and features of housing that are selected in those questions. Assessors should make sure households understand to only select the types of housing they are interested in as opposed to blindly opting into everything, as denying a unit will be [counted as a strike](#).
- Upon completing the CE Enrollment, staff should notify the household to inform them if any of the provided answers change, explaining that some answers affect their CE Assessment score.

Timeline for completing the CE enrollment process

The BoS CoC expects all Emergency Shelter and Street Outreach teams in the CoC to complete the Coordinated Entry enrollment process with households enrolled in their projects so they can be considered for resources that refer through CE.

The CoC expects that Emergency Shelters complete the CE enrollment process within two weeks of a household's enrollment date into the shelter.

Given that it may take longer to engage with a household that is staying in a place not meant for human habitation, the CoC expects Street Outreach projects to complete the CE enrollment process within thirty days of the household's date of engagement. The CoC understands some households in Street Outreach projects may not be added to CE for various reasons (e.g. not eligible because they are experiencing homelessness within other CoC more than 50% of the time, not yet engaged to a substantial degree, etc).

Next steps after being added to CE project

Once a household is added to the CE project, they will be considered for housing opportunities as they become available. However, households enrolled in CE and the providers supporting them should know that due to these housing projects having scarce resources, not all households added to CE will ultimately be offered housing through the CE system.



BoS CoC wants to emphasize to providers that getting a household enrolled in CE should be just one piece of a larger plan to support them. Providers should also prioritize:

1. Ensuring households are connected with immediate services that can support their immediate needs (Street Outreach case management, shelter access, etc), and
2. Pursuing other routes to housing and housing applications that could be a fit for the household.

Prioritization

The CE Assessment score is the main mechanism used for prioritizing households. The tool was created to assess different factors that contribute to a homeless household's level of vulnerability. The CE Assessment score is generated based on answers to questions in the CE Assessment, CE Quick Screen, and CE intake. Those answers can be edited if they change over time.

When there is a housing vacancy, VESTA will use the information gathered during the CE Enrollment process to identify all households eligible and interested in the opportunity ([see Referral section](#) for more details on this). Those households will then be considered in the order of their CE Assessment score, starting with the highest scoring household. This process is the same for Permanent Supportive Housing, Transitional Housing, Rapid Re-Housing, and Joint Transitional Housing/Rapid Re-Housing projects that fill openings through CE.

Score tiebreakers

If there is a tie for the highest scoring households identified for a housing vacancy, the Regional Navigator should consider the following:

1. Subpopulation focus - If the project with the vacancy has identified in their project application a specialty in serving a certain subpopulation (e.g. Survivors) and one of the tied households is a member of that subpopulation, that household will be given priority and referred to the unit. If this subpopulation priority does not break a tie, the Regional Navigator will move on to #2.



2. Veteran status – Households with Veteran status will be given priority in the event of a CE Assessment score tie. If the Veteran priority does not break a tie, the Regional Navigator will move on to #3.
3. Length of time homeless - Priority will be given to the household with the greater “length of time homeless” score in the breakdown of their CE Assessment score (found on client summary page of CE VESTA record).

Regionalization Policy (Region priority)

After a successful pilot phase, the CoC made permanent a policy that prioritizes homeless households within a region for the vacancies in that region.

Region in which a household is considered for housing placement

When selecting a region on the CE Assessment, case managers/Regional Navigators will select the region in which the household is currently experiencing homelessness. If a household relocates to a different region, the case manager/Regional Navigator that was working with the client should update the CE Assessment answer and communicate this to the Regional Navigator of the new region.

When a household experiencing homelessness outside of the BoS CoC geography has an eligible geographic tie and is thus eligible for BoS programs, the region on their CE Assessment should be set to the region for which their tie applies.

Switching regions

If a household wants to be considered for housing in a region other than the one in which they are currently experiencing homelessness, they must prove one of the below ties to the desired region:

1. Household has had a permanent residence within a different Balance of State region within the past 5 years and desires to return to their community and support system



- a. Permanent residency is defined as a consistent location where household resided for at least 12 consecutive months

2. Household is fleeing domestic violence and needs to relocate for safety reasons

For those who do not qualify under an above category, but for which the household and case manager believe there is good reason to allow access to a different region, they can write a letter explaining why and send it to the Regional Navigator of the region the household is currently in. The Regional Navigator will inform the CE Lead and bring this case to be discussed at the next CE Committee meeting. The CE Committee will discuss and make a recommendation to approve or deny the request. The CE Lead and CoC Supervisor will take recommendations into account in making a final decision.

Required documentation to switch regions

For households that meet one of the two ties to a different region outlined in the above section, documentation will be collected by the Regional Navigator before reflecting the region switch in their CE Assessment. Below are the verifying documents that will be accepted – households only need to provide one from those listed below:

1. Those claiming permanent residency in the Balance of State within the past 5 years:
 - a. Lease agreement, OR
 - b. Notice to Quit or other court documentation, OR
 - c. Verification letter from a provider, OR
 - d. Verification letter from a landlord
2. Fleeing Domestic Violence
 - a. Restraining order, OR
 - b. Police reports, OR
 - c. Verification letter from a provider, OR
 - d. Self-certification form (form HUD-5382)



When there are no eligible households in the region

When identifying a referral for a housing placement, if the Regional Navigator finds there are no eligible households within the region, the below steps will be followed to identify a household to refer:

1. Expanding search to all regions: The Regional Navigator who has a vacancy but no eligible household in their region, will use VESTA to identify the household with the next highest assessment score in the full CoC that would be an appropriate match for that vacancy. If they identify a household they will reach out to the Regional Navigator in the region the household is currently in before contacting the household. When reaching out to the household and their case manager, the Regional Navigator will cc: the Regional Navigator of that region on the email. The Regional Navigator will notify the CE Lead that they have expanded the search for a specific vacancy to all regions.
 - a. If the Regional Navigator has expanded search to all regions, they will continue to check daily while the vacancy remains open to confirm if an eligible household within their region has been added to Coordinated Entry. If so, that household will be given priority and considered next before continuing on with households from other regions.
2. Contacting the EOHLC team to discuss moving forward with screening per HUD's order of priority: Once all households from other regions are considered, if there is still not a household that is eligible and interested, the Regional Navigator should inform the CE Lead and include the housing provider on that email. The CE Lead will notify the CoC Supervisor and Contract Coordinator for the project. They will set up a meeting with housing provider to discuss considering households that do not meet the eligibility criteria, agreeing on next steps that align with the orders of priority outlined by HUD, in the interest of filling the housing vacancy as soon as possible. The housing provider should be aware that this does not mean the project's eligibility criteria has changed. Filling vacancies with households that do not meet the original eligibility criteria is only allowed with referred households from the Regional Navigator and only with confirmation from EOHLC after the above process has been followed. Projects should know that enrolling households that do not meet original eligibility criteria is something that



will be considered at time of project evaluation. If a Regional Navigator gets to this stage of considering households that do not meet the full eligibility criteria, they will first screen households in the region of the vacancy, and then expand to all regions if necessary.

- a. If the Regional Navigator has moved onto this step, they will check VESTA daily to confirm if an eligible household from any region has been added to Coordinated Entry. If so, that household will be given priority and considered next before continuing on with households that do not meet the project's full eligibility criteria.

Referral

All CoC-and ESG-funded projects within the BoS CoC geography must only fill vacancies with referrals from the Coordinated Entry system. The housing provider initiates this process by completing an Available Unit Form in VESTA, which captures details about the vacancy that are needed to make an accurate referral. Once that Available Unit Form is submitted, the Regional Navigators (or Youth Navigators for YHDP vacancies) will begin the process of identifying a household from the CE project for referral.

Identifying a household for referral

The CE system strives to limit the number of unsuccessful referrals due to a household being ineligible or uninterested. The following elements are considered when identifying a household for referral.

Eligibility

- **Program eligibility:** Each type of project has baseline eligibility criteria (e.g. RRH projects require Category 1 or 4 homelessness). A project may also have slightly different eligibility criteria than other projects of the same component type based on their application (e.g. a project may exclusively serve youth households). When identifying a referral, information from a household's VESTA record will be considered and only households who are deemed eligible per that information will be considered.
- **Unit eligibility:** Information specific to the unit is captured on the Available Unit Form that the housing provider completes when reporting a vacancy for referral. Unit eligibility information such as the number of bedrooms in the unit will be considered when identifying an eligible



household for referral.

Interest

- The CE Assessment collects information about a household’s housing preferences and needs, such as if they need a first-floor unit or whether they are interested in housing opportunities with shared living spaces. A household will only be contacted about a housing opportunity if it aligns with the answers provided in the “Housing Preferences and Needs” section at the end of their CE Assessment (e.g. Household states they need a first-floor unit or a unit in a building with an elevator, so they will only be offered units that meet that criteria).

Prioritization

- As mentioned in the [Prioritization section](#), housing placements will be offered to households in the order of their CE Assessment score. Once the highest scoring households that are both eligible and interested are identified by the VESTAmator, the Regional Navigator will address each eligible household in order until one is a successful referral.

Other

- If a household has an open referral for another project, they will not be considered for a second opportunity.
- If a household has two strikes within the current calendar year, they will not be considered (see [Strikes section](#)).

Default Unit Size

The default unit size is the number of bedrooms for which a household is eligible by default, based on their household composition. When determining the default unit size a household is eligible for, the Balance of State CoC will default to assigning one bedroom for each two persons within the household, except in the following circumstances:

- Adults will be allocated one bedroom per adult. If two adults consider themselves partners, they will be allocated one bedroom.
- Family members of different genders (other than spouses or partners) will



be allocated separate bedrooms, except when both are children under 6 years of age, in which case they will share a bedroom.

- Approved live-in aides will be allocated a separate bedroom.
- A parenting minor will not be required to share a bedroom with a child.

When determining number of bedrooms, please also consider:

- For purposes of determining unit size, an adult is 18 years of age or older and a child is under 18 years of age.
- An adult will not be required to share a bedroom with a child.
- When a household member is pregnant, the unborn child will be included in the size of the household.
- Two children of the same gender will share one bedroom regardless of the age differential. This includes children of blended families, who may have different parents.
- Households comprised of one person will be allocated one bedroom.
- Reasonable accommodation requests for a larger unit, based on health-related reasons, must be submitted to the Regional Navigator of the region selected on the CE Assessment. Reasonable accommodations will require verification by a knowledgeable professional source, such as a doctor or other medical professional.

Referring households to a unit size larger than the default unit size

If there are no eligible households with a default unit size matching an available unit, a household can be referred to a larger unit that doesn't match their default unit size as long as they are not "over-housed."

Per the definition of the Balance of State CoC, a household is over-housed if either:

- 1) two partners/spouses have separate bedrooms, or
- 2) the number of bedrooms in the unit is greater than the number of household members

The Navigator will consider households in this order when making a referral to an available unit:

1. Eligible households in region whose default unit size matches size of available unit
2. Eligible households in region whose default unit size does not match size of available unit, but



where household would not be overhoused

3. Eligible households out of region whose default unit size matches size of available unit
4. Eligible households out of region whose default unit size does not match size of available unit, but where household would not be overhoused

Opting into a smaller unit

A household may opt into a unit smaller than their default unit size, as long as 1) the dwelling unit has at least one bedroom or living/sleeping room for each two persons, and 2) it is in compliance with Habitability Requirements under Massachusetts regulation ([105 CMR 410.420](#)) and any applicable local codes.

Strikes

This system is intended to keep the CE system running efficiently and to minimize unsuccessful referrals, thus filling housing vacancies as quickly as possible. The policy is not meant to be punitive.

It is expected that households accept a referral if they are eligible and it aligns with the needs and preferences selected in their CE Assessment. If a household instead rejects a referral, they will receive a “strike.” If a household receives two strikes in a calendar year, they will not be offered another unit that year. All strikes will be reset on January 1st. Regional Navigators will record strikes as Encounters in the household’s CE VESTA record.

Confirming that the needs and preferences recorded in a household’s CE Assessment are accurate is the best way for a client and case manager to prevent a household from being put in the position of rejecting a unit they aren’t interested in and consequently receiving a strike.

After a rejection, the Regional Navigator will discuss with the household and case manager what changes need to be made to the household’s CE Assessment to prevent a similar unsuccessful referral. The Regional Navigator will notify the household and/or case manager of the strike.



If a household denies a unit for one of the reasons below, they can submit documentation for consideration of not receiving a strike.

1. Unit or area is not safe for reasons related to domestic violence, dating violence, sexual assault, or stalking
 - Household must provide one of the forms of documentation related to domestic violence outlined in the [Regionalization section](#)
2. Unit or area is not adequate due to other health and safety related concerns
 - Must provide signed documentation from a service provider that states clear explanation of why rejection is necessary for health and safety reasons
3. Unit or area is not adequate due to current location of employment
 - Must provide documentation of current employment and location

Documentation must be sent to the Regional Navigator facilitating the referral process. These requests will be reviewed by the team of BoS Regional Navigators on a monthly basis to make final decision of if a strike will be issued. The decision will be recorded by the Regional Navigator in VESTA.

If a household was referred to RRH but their housing search has taken 3 months or more and they haven't found a unit yet, they can request to cancel the referral without a strike penalty.

Regional Navigator referral steps

Regional Navigators will use the VESTAmator report to identify the highest scoring households that are [eligible](#) and [interested](#) in a housing vacancy. Regional Navigators will then review the record of the highest scoring household to confirm they appear to be eligible and interested per the information recorded in their VESTA record. If so, they will contact that highest scoring household and their case manager, when case manager contact information is provided, to share details about housing opportunity, including any eligibility requirements specific to that project. Regional Navigators will inform the household and/or case manager of the deadline by which they must 1) confirm interest in the housing opportunity, and 2) provide complete eligibility documentation to the Regional Navigator. The deadline will be five business days from when the Regional Navigator first contacts the household



and/or case manager. The Regional Navigator will record a Referral CE Event the same day they contact the household and/or case manager.

Eligibility documentation requested by the Regional Navigator will be limited to Verification of Homelessness (Chronic homelessness if required for the vacancy), Verification of Disability (if required by project), and documentation to prove they are a part of a subpopulation that is required for the vacancy (if applicable).

In the interest of trying to make accurate referrals, the Regional Navigator does a preliminary check of eligibility documentation to show the household is likely eligible. This means they check homeless verification for accuracy in accordance with HUD and BoS standards, confirm chronic homelessness documentation speaks to all twelve months of homelessness, and verify that verification of disabling condition includes the language in HUD's definition of disabling condition and is signed by an appropriate party. It is ultimately the responsibility of the housing provider to verify all documentation and confirm that it meets the minimum standards for their project.

Note: If the housing placement being offered will ultimately require additional documentation (e.g. vacancy requires income documentation because the housing subsidy is paid by a Housing Choice Voucher), the Regional Navigator will inform the household of this requirement and encourage them to start collecting that documentation, but they will not require this documentation in order to refer the household to the opening.

If the household and/or case manager does not confirm interest and provide complete eligibility documentation by the deadline, the Regional Navigator will:

1. Record in the Referral CE Event the unsuccessful outcome of the 5 day screening period;
2. Notify the household and/or case manager that they're moving on to the next household and inform them that since they've been screened once and didn't provide documentation, they will not be contacted about another opportunity until they submit the requested documentation to the Regional Navigator (If household has an active enrollment in SO or ES, that counts as sufficient proof of VoH); and



3. Contact the next highest scoring household and repeat this process.

If the household and/or case manager does confirm interest and provide complete eligibility documentation by deadline, the Regional Navigator will:

1. Upload eligibility documentation to the CE household's VESTA record.
2. Select "successful referral" as outcome of the 5 day screening period in the Referral CE Event. That selection will automatically send a pending intake to the dashboard of the Housing Provider's VESTA project.
3. Create an email thread to connect the household and/or case manager with the housing provider and instruct the housing provider to 1) sign into VESTA to review eligibility documentation, and 2) coordinate with the household and/or case manager to set up an intake meeting.

Recognizing that the list of who is enrolled in the Coordinated Entry project is always fluctuating, Regional Navigators will be aware of new households added while they are reaching out to households about a vacancy. If they have already started working their way down the list of eligible and interested households, before moving on to the next household, they must confirm if a higher scoring household has been added to the VESTAmator report. If so, they will contact the new higher scoring household next before continuing down from the point in the list they had reached.

Post-referral timeline

When Regional Navigators make a referral, they will connect the housing provider with the household and/or their case manager via email. In that communication, they will ask the housing provider to verify eligibility documentation and be in touch with the household and/or case manager within five business days to schedule an intake appointment. The Regional Navigator will also state that once the housing provider does so, the client and case manager have 10 business days by which they must schedule the intake meeting. If the housing provider does not reach out to schedule the intake within five business days, the Regional Navigator will follow up with the housing provider via email and include the project's Contract Coordinator on that message.



The housing provider is expected to make repeated efforts to contact the household and/or case manager with the aim of scheduling an intake meeting. They should record these contact attempts on the Referral Contacts form of the pending intake, found on their project dashboard. If after 10 business days and consistent attempts to schedule an intake the housing provider has not been able to schedule an intake meeting, they can reject the referral in VESTA and ask for a new one.

Housing Provider's role in referral process

Housing providers should complete the Available Unit Form in VESTA as soon as they have a vacancy to fill. Submitting the Available Unit Form will notify the Regional Navigator of the vacancy and kickstart the process of identifying a referral.

Once the Regional Navigator sends a referral to the housing provider, the provider should first check the eligibility documentation the Regional Navigator uploaded to VESTA to confirm it is sufficient. In the interest of trying to make accurate referrals, the Regional Navigator does a preliminary check and collects documentation that shows the household is likely eligible. However, the ultimate responsibility to check and verify eligibility documentation is that of the housing provider.

Once eligibility documentation is approved internally, the housing provider should respond to the referred household and/or the household's case manager within five business days of the referral being made to set up an intake meeting. The housing provider must keep the Regional Navigator included on communications so the Navigator is aware of how the referral is proceeding.

If the housing provider decides the referral should be denied, they must:

1. Inform the household, case manager, and Regional Navigator of this decision and provide a reason for the decision (e.g. household found to be ineligible, household did not reply within ten business day period, household rejected referral); and
2. Complete the Referral Contacts form associated with the referral (found on the dashboard of their VESTA project) to document all efforts that they made to contact the household; and
3. Complete the denial form associated with the referral (found on the dashboard of their VESTA project) explaining the reason.



If the housing provider is planning to reject a referral because the referred household has previously been terminated from a project they manage, the project should first notify the CoC Supervisor to discuss further. Previous termination from a project does not bar the subrecipient from providing further assistance to the same household at a later date. The BoS wants providers to be open to the prospect of working with a household again given that circumstances can change and households can be successful in a subsequent enrollment.

Enrolling and moving in participants

To house individuals as quickly as possible in a Housing First manner, housing providers should move forward with enrolling households in their project and allowing them to sign a lease and move-in if they've provided a Verification of Homelessness, Verification of Disabling Condition (if required for project), and documentation that household belongs to the project's subpopulation focus (if applicable). Other documentation like forms of ID should not delay a household from moving in and can be prioritized as the first steps of case management with that program participant. If an agency has a reason they must collect documentation beyond Verification of Homelessness, Verification of Disabling Condition, and documentation of subpopulation status for a household to move in (e.g. unit is funded by a project-based voucher and household must be approved by housing authority), the project must notify their Contract Coordinator and the CE Lead to explain the reason.

Wheelchair accessible units

Given the scarcity of wheelchair accessible units and the CoC's interest in ensuring those units go to households who need them, the BoS CoC has created the following process when a wheelchair accessible unit becomes available.

The first households screened for these vacancies will be households who have indicated in the Housing Preferences and Needs section of their CE Assessment that they need a wheelchair accessible unit. Households with the region of the vacancy selected will be screened first, in order of CE Assessment score. If necessary, the next households to be screened will be households in need of wheelchair accessible units that have a different region selected.



In order to be referred, the household must still meet the eligibility criteria for the project. Additionally, they will need to provide documentation from a medical professional that they need a wheelchair accessible unit. For this documentation of needing a wheelchair accessible unit, an extension beyond the five-business day screening deadline will be granted if requested. If after screening all households in the CE project who have indicated they need a wheelchair accessible unit, a household has not been identified for referral, the Regional Navigator will begin screening households who have not indicated they need a wheelchair accessible unit.

Other Policies and Procedures

Domestic Violence Coordinated Entry (DV CE) project

The DV CE project was created in VESTA so survivors eligible for the CE project could be entered anonymously and considered for housing opportunities through the CE system. When households that present at Victim Service Providers (VSPs) complete a CE enrollment packet with the VSP, personal identifiable information (PII) like name and exact DOB are not collected. Households are then entered into the DV CE project in VESTA with a coded name that is linked to the Victim Service Provider (VSP) with whom they are engaged. This coded entry into CE for survivors can be completed by VSPs directly with a client, or if a client is not connected with a VSP already and does not want to be, they can complete this process with the DV specialist overseeing the DV CE project.

To best protect the privacy of survivors, the DV CE system aims to involve as few parties as possible when entering a client into the system and making a referral. For clients who enter DV CE through a VSP, the VSP acts as the liaison if a household is prioritized for an opportunity and needs to be contacted about being referred. Households are only ever directly connected with a housing provider if they decide they want to move forward with an opportunity. Additionally, the DV Specialist does not collect eligibility documentation, which contains PII, for DV CE households when screening them for an available unit. If the household is interested, the DV Specialist connects the VSP and the case manager to directly exchange required documentation, limiting the exchange to just those two parties.



The DV CE project ensures that survivors presenting at VSPs and entered into CE as anonymous households, as well as survivors that present at mainstream homeless providers, are considered for both DV-specific housing projects as well as mainstream housing projects.

Assessing vulnerability level for households fleeing or attempting to flee

The DV CE System has integrated vulnerability considerations based on the Jacquelyn C. Campbell Danger Assessment, which evaluates lethality risk. Households in the CE and DV CE projects that are fleeing or attempting to flee will complete the Danger Assessment with their VSP or the DV Specialist and have that score added to their Quick Screen (and subsequently their CE Assessment score if they screen into the CE project). This measure is to ensure that lethality risk is a factor of vulnerability considered in our CE system.

Referral steps for DV housing project vacancies

The referral process for DV housing projects will vary from the mainstream process outlined in the [Regional Navigator referral steps section](#) as follows:

- Upon being contacted by the DV Specialist about a housing opportunity, case managers must confirm initial eligibility and interest of their client with the DV Specialist within 5 business days. Case managers of clients who have been entered as coded clients into DV CE may request an additional 5 business day extension, if needed. The case manager at the VSP must send this extension request to the DV Specialist before the initial 5 business day deadline. The extension will be automatically granted upon request.
- To protect the privacy of the household, no documentation needs to be shared with the DV Specialist during this period of confirming initial eligibility and interest.
- Once a case manager has confirmed eligibility and interest of their client with the DV Specialist, they will be connected on an email thread with the VSP administering the housing program. VSPs must respond to client and case manager within five business days to initiate next steps of the referral process. For DV-specific projects, the VSP housing provider may set a reasonable deadline for when eligibility documents must be provided and intake completed. It is suggested



that VSPs adopt the mainstream CE policy of setting a deadline of 10 business days following their outreach for the client to schedule and attend their intake if this is part of the process for gathering eligibility documentation.

Expectations for VSPs that run housing projects

VSPs operating housing projects that fill vacancies through CE should follow the expectations outlined in the [Housing Provider's role in the referral process section](#). Because VSPs cannot use VESTA, there are two differences to consider:

- **Reporting vacancies** – When a VSP's housing project has a vacancy, they should complete an Available Unit Form and send it via email to the DV Specialist to begin the referral process.
- **Rejecting referrals** – If a VSP is rejecting a referral, they should inform the household and case manager and explain the reason. To maintain confidentiality of the household, they should inform the DV Specialist and CE Lead in a separate communication of the reason for rejection.

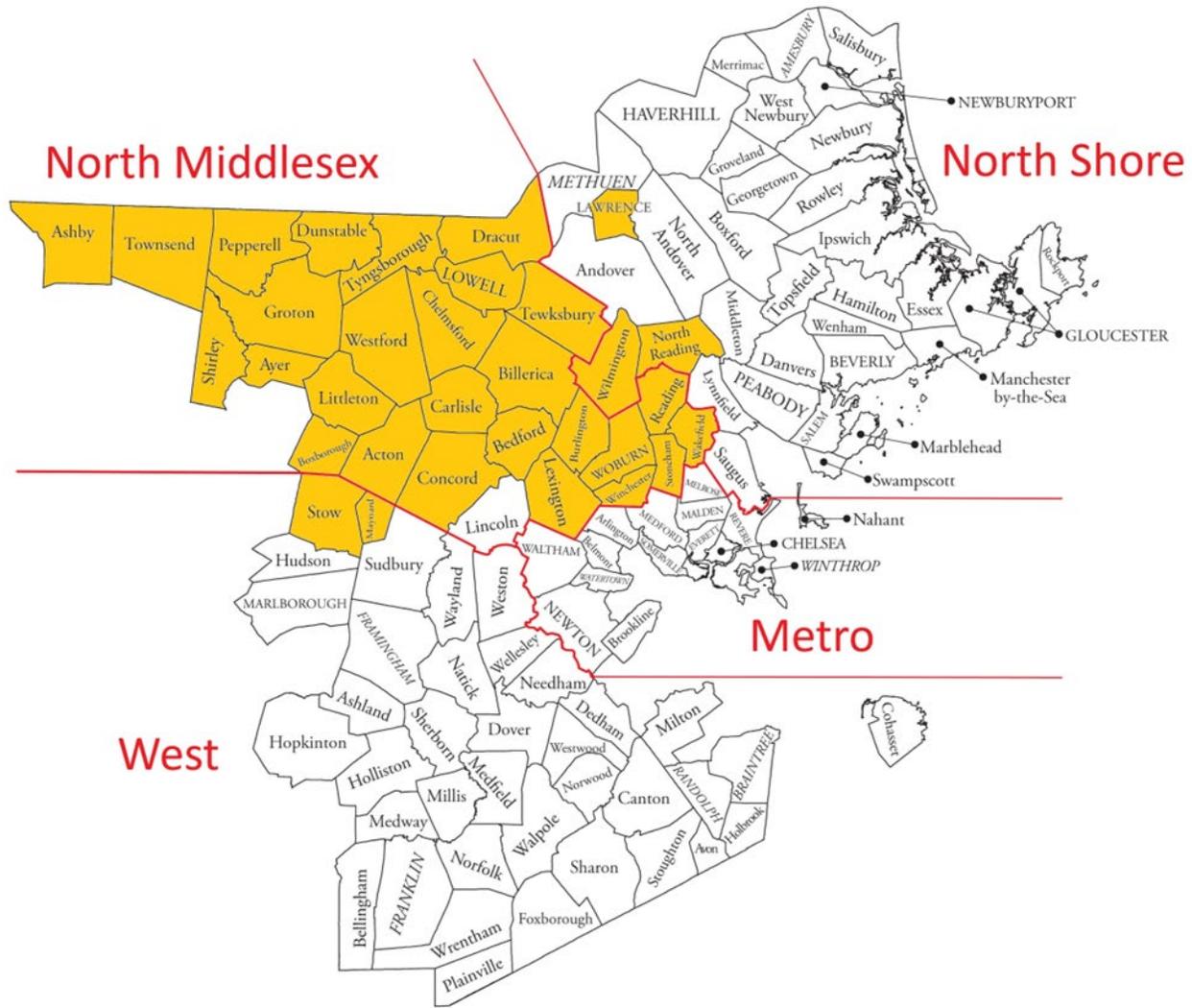
Removing households from the CE project

Households shall only be exited from the CE project in the following situations:

- No longer eligible per [CE Eligibility policy](#)
- Known to have left the BoS CoC area permanently
- Deceased
- They personally request removal
- They have not been active in any emergency shelter or street outreach project participating in VESTA for 90 days, nor have they had their homeless status confirmed by a Regional Navigator or provider who can record confirmation in the CE project and keep them active in CE (in this scenario, VESTA will automatically exit them from CE)



Appendix A: Region Breakdown



Metro				
Arlington	Chelsea	Medford	Newton	Waltham
Belmont	Everett	Melrose	Revere	Watertown
Brookline	Malden	Nahant	Somerville	Winthrop



North Middlesex				
Acton	Burlington	Groton	Reading	Wakefield
Ashby	Carlisle	Lexington	Shirley	Westford
Ayer	Chelmsford	Lincoln	Stoneham	Winchester
Bedford	Concord	Littleton	Tewksbury	Woburn
Billerica	Dracut	Lowell	Townsend	
Boxborough	Dunstable	Pepperell	Tyngsboro	

North Shore				
Amesbury	Gloucester	Manchester by the Sea	North Andover	Saugus
Andover	Groveland	Marblehead	North Reading	Swampscott
Beverly	Hamilton	Merrimac	Peabody	Topsfield
Boxford	Haverhill	Methuen	Rockport	Wenham
Danvers	Ipswich	Middleton	Rowley	West Newbury
Essex	Lawrence	Newbury	Salem	Wilmington
Georgetown	Lynnfield	Newburyport	Salisbury	

West				
Ashland	Foxborough	Maynard	Norwood	Walpole
Avon	Framingham	Medfield	Plainville	Wayland
Bellingham	Franklin	Medway	Randolph	Wellesley
Braintree	Holbrook	Millis	Sharon	Weston
Canton	Holliston	Milton	Sherborn	Westwood
Cohasset	Hopkinton	Natick	Stoughton	Wrentham
Dedham	Hudson	Needham	Stow	
Dover	Marlborough	Norfolk	Sudbury	



Appendix B: YHDP Region

The towns and cities in the BoS YHDP region are listed below. The YHDP region is shown in yellow in the map in Appendix A.

YHDP Region			
Acton	Chelmsford	Lowell	Tewksbury
Ashby	Concord	Maynard	Townsend
Ayer	Dracut	North Reading	Tyngsborough
Bedford	Dunstable	Pepperell	Wakefield
Billerica	Groton	Reading	Westford
Boxborough	Lawrence	Shirley	Wilmington
Burlington	Lexington	Stoneham	Winchester
Carlisle	Littleton	Stow	Woburn

Appendix C: RRH Start-Up Cost Only Pilot

The BoS CoC will implement a pilot initiative in which CoC and ESG RRH projects are allowed to provide start-up cost assistance alone, if that is all that the household needs and they already have a unit identified. Please see the BoS CoC’s Rapid Re-housing Written Standards for further information about this pilot. The pilot will run through August 31, 2025, at which point it will be assessed and decided if it should continue permanently.

Prioritization for start-up cost only households

When a Regional Navigator is identifying a referral for a RRH vacancy, Regional Navigators will follow these steps:

1. Determine if there are any households in CE who checked the box on the Quick Screen indicating they only need start-up cost assistance and have a unit secured. These households will be given priority.
 - a. The Regional Navigator will screen these households first. They will first clarify with the housing provider if the rent amount for the identified unit, provided in Quick Screen, meets any rent limit restrictions. If rent amount is okay, the Regional Navigator will follow referral steps



outlined in the [Referral section](#). Upon contacting households, the Regional Navigator will confirm that the household is still only in need of start-up cost assistance and still has a unit secured.

- i. If yes, the Regional Navigator will inform the household and/or their case manager about what the household is eligible for given that they are being prioritized as a household only in need of start-up costs. The Regional Navigator should refer to the RRH Written Standards to make sure all pertinent information is communicated.
 - ii. If household does not have a unit secured or needs more than just start-up costs Regional Navigator will inform the household that their Quick Screen is being edited to uncheck that box, and instruct them to contact their case manager or Regional Navigator if they secure another unit in the future and only need start-up costs at that time.
2. When/if there are no households in VESTA that are only in need of start-up costs, the Regional Navigator will fill the vacancy per the referral steps outlined in the [Regional Navigator referral steps section](#). Households screened at this stage are eligible for full participation in the RRH project.

Appendix D: Disabling condition documentation

The resource below from HUD outlines the definition of disabling condition for the CoC Program. Please consult this document, particularly the Documentation Requirements section, when confirming if documentation meets HUD requirements.



DISABILITY DEFINITION

RESOURCES

CONSULT THE CoC RULE

CoC Program Interim Rule

– 578.3 Definitions:

<https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml#seqnum578>

RESOURCES ON THE HUD EXCHANGE

Criteria and Recordkeeping Requirements for Definition of Homelessness:

<https://www.hudexchange.info/resource/1974/criteria-and-recordkeeping-requirements-for-definition-of-homeless/>

Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 – including disability definition:

<https://www.hudexchange.info/resource/1715/mckinney-vento-homeless-assistance-act-amended-by-hearth-act-of-2009/>

This resource is prepared by technical assistance providers and intended only to provide guidance. The contents of this document, except when based on statutory or regulatory authority or law, do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

SUMMARY

For CoC-Program funded Permanent Supportive Housing (PSH) projects, households must include a member with a qualifying disability, and it may be an adult or child. PSH projects that are DedicatedPLUS or have beds dedicated to people experiencing chronic homelessness, the head of household must have the qualifying disability. (See [Chronic Homelessness one pager](#)). Other CoC-funded projects may also include targeting to persons with disabilities even though they are not required to do so, but must do so in compliance with all Fair Housing requirements (see 24 CFR 578.93).

DISABILITY DEFINITION

A qualifying disability for CoC Program admission is defined as having one or more of the following:

- Physical, mental, or emotional impairment
- Developmental disability
- HIV/AIDS.

Disability verification is only required at the participant's project entry into PSH and does not need to be recertified for the person to continue receiving assistance. Recipients and subrecipients have 45 days to obtain the documentation of disability at project entry into PSH as long as there is intake worker observation that a disability is present (see more details on documentation requirements below).

Physical, Mental, or Emotional Impairment: Is a physical, mental, or emotional impairment, which includes impairments caused by alcohol or drug abuse, post-traumatic stress disorder or brain injury that:

- Is expected to be long-continuing or of indefinite duration; AND
- Substantially impedes the individual's ability to live independently; AND
- Could be improved by the provision of more suitable housing conditions.

Developmental Disability: Is a severe, chronic disability that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 22;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following:

- Self-care;
- Receptive and expressive language;
- Learning;
- Mobility;
- Self-direction;
- Capacity for independent living; or
- Economic self-sufficiency.

- Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated; or
- An individual ages birth to age nine, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria above if the individual, without services and supports, has a high probability of meeting these criteria later in life.

HIV/AIDS: The disease of acquired immunodeficiency syndrome (AIDS) or any condition arising from the etiologic agency for acquired immunodeficiency syndrome.

DOCUMENTATION REQUIREMENTS

Documentation of disability is required to determine PSH eligibility. The following forms of disability status documentation are acceptable to determine PSH eligibility:

- Written verification from a professional who is licensed by the state to diagnose and treat the identified condition;
 - Documentation must state that the disability:
 - Is expected to be of long-continuing or indefinite duration; AND
 - Substantially impedes the individual's ability to live independently; AND
 - Could be improved by the provision of more suitable housing conditions.
- Written verification from the Social Security Administration (SSA) of a qualifying disability; OR
- Copy of a statement showing that the applicant is the recipient of a disability check such as Social Security Disability Insurance (SSDI) or Veteran Disability Compensation.

Intake staff may record their observations of a disability as long as it is confirmed by the standards above within 45 days of the application for assistance. If the recipient or subrecipient does not have the appropriate documentation within 45 days, the funds to serve that participant are no longer eligible costs for the CoC Program-funded grant.

Disability may never be documented based on oral third-party reports or self-certification by the potential program participant.

NOTE: *For Development Disability:* could be from the state agency providing services to the person; *For HIV/AIDS:* Would not need to certify that the condition is of long-continuing or indefinite duration and substantially impedes the ability to live independently, so long as the condition is verified.

Appendix E: Emergency Transfer Plan

VAWA Emergency Transfer Plan Policy

(Survivors and Victims of domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member)

The Balance of State (BoS) Continuum of Care (CoC) is concerned about the safety of the tenants in all our CoC-funded housing projects, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized. In accordance with the Violence Against Women Act (VAWA), CoC-funded projects providing permanent housing or transitional housing, except safe havens, must allow tenants who are victims of domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized to request an emergency transfer from the tenant's current unit to another unit.

The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of a housing project to honor such a request for tenants currently receiving rental assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized, and on whether the housing provider has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer; the documentation needed to request an emergency transfer; confidentiality protections; how an emergency transfer may occur, and guidance to tenants on safety and security. The plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency which ensures that Continuums of Care are in compliance with VAWA. Note that housing providers are also subject to additional requirements under VAWA and HUD regulations implementing VAWA at 24 CFR part 5, subpart L, and at 24 CFR part 578.

The BoS CoC asks all housing providers funded by the BoS CoC to adopt this as their Emergency Transfer Plan for CoC-funded programs.

Eligibility for Emergency Transfers: A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if:

- The tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit; or
- The tenant is a victim of a sexual assault, and the sexual assault occurred on the premises within the 90-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.



Emergency Transfer Request Documentation To request an emergency transfer, a tenant must notify the Director of the housing project in which they are enrolled and submit a written request for a transfer to that individual. The tenant may request and shall be entitled to receive assistance in this process from their case manager. The housing provider will provide reasonable accommodations to this policy for individuals with disabilities. It is not necessary that the tenant complete a specific form. The tenant's written request for an emergency transfer should include either:

- A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains in the same dwelling unit assisted under the housing provider's project; OR
- A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

The housing project may request additional documentation from a tenant in accordance with the documentation policies of HUD's regulations at 24 CFR part 5, subpart L.

Confidentiality: The housing project will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives the housing project written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed the act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about the housing provider's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability: The housing provider cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. However, the housing provider will act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to the availability and safety of a unit.

The housing project will also contact other, non-CoC housing projects in the area to determine whether they have an available unit. If a unit is available, the tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant is being transferred. The housing provider may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If the housing provider has no safe and available units for which a tenant who needs an emergency transfer is eligible, the housing provider will do two things:

1. Secure a release from the tenant to share information with the Coordinated Entry System and, using an Emergency Transfer Form (see form HUD-5383 below), notify the Coordinated Entry System



within 1 business day of receipt of form being completed. The Coordinated Entry system will work with the housing provider to identify a new unit within the CoC's inventory of projects and units and will prioritize the requested transfer above all other housing placements. Households who qualify for an emergency transfer but where a safe unit is not immediately available for an internal emergency transfer, shall have priority over all other applicants for CoC funded rental assistance, transitional housing, and permanent supportive housing projects, provided that: The individual or family meets all eligibility criteria required by Federal law or regulation or HUD NOFA; and the individual or family meets any additional criteria or preferences established in accordance with Fair Housing requirements at §578.93(b)(1), (4), (6), or (7).

The individual or family shall not be required to meet any additional eligibility criteria or preferences other than those required as part of the funding requirements for the project. The individual or family shall retain their original homeless or chronically homeless status for the purposes of the transfer.

2. Assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. If the tenant is interested, the housing provider will also assist tenants in contacting local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

In tenant based rental assistance projects, if a family household separates in order to effect an emergency transfer, the leasing or rental assistance remains with the household members fleeing. The household members remaining in the original unit, being ineligible for the project, shall not be entitled to retention of the assistance.

Safety and Security of Tenants: Pending processing of the transfer request and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe. The tenant is encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Safelink is the Massachusetts statewide 24/7 toll-free domestic violence hotline, and can be reached at (877) 785-2020. People who are Deaf and hard of hearing can reach Safelink through the Mass Relay service by dialing 711 in Massachusetts. From anywhere else, dial 1-800-439-0183 for English or 1-800-930-9252 for Spanish. Ask to be connected to the hotline (1-877-785-2020).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Providing and explaining policy and form to program participants: The Balance of State CoC requires that all providers share this notice at the time of intake to all participants entering into their CoC-funded housing projects. At that time, the housing provider should explain to the participant how they would submit a request for an emergency transfer, explain the steps of the process, and ensure the participant has a copy of this process.



Form HUD-5383: This below form must be used by agencies operating CoC housing projects to initiate an external emergency transfer through Coordinated Entry to another CoC program. Housing providers should ensure they also have a properly executed release of information to request the transfer through the Coordinated Entry System, and may submit the form electronically to the CoC Supervisor (Karen Byron, karen.byron@mass.gov) via email with the subject line “Emergency Transfer Request” to ensure immediate attention. In the event that submitting electronically is not available, the form may be hand delivered at 100 Cambridge St., Boston MA.



**EMERGENCY TRANSFER
REQUEST FOR CERTAIN
VICTIMS OF DOMESTIC
VIOLENCE, DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING**

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2577-0286
Exp. 06/30/2017

Purpose of Form: If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA). Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

The requirements you must meet are:

(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking. If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.

(2) You expressly request the emergency transfer. Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.

(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you submit this form or otherwise expressly request the transfer.

Submission of Documentation: If you have third-party documentation that demonstrates why you are eligible for an emergency transfer, you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER

1. Name of victim requesting an emergency transfer: _____

2. Your name (if different from victim's) _____

3. Name(s) of other family member(s) listed on the lease: _____

4. Name(s) of other family member(s) who would transfer with the victim: _____

5. Address of location from which the victim seeks to transfer: _____

6. Address or phone number for contacting the victim: _____

7. Name of the accused perpetrator (if known and can be safely disclosed): _____

8. Relationship of the accused perpetrator to the victim: _____

9. Date(s), Time(s) and location(s) of incident(s): _____

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking a transfer? If yes, skip question 11. If no, fill out question 11. _____

11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit.

12. If voluntarily provided, list any third-party documentation you are providing along with this notice:

This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____