

**Addendum to  
Arizona Balance of State Continuum of Care  
Coordinated Entry Policy**

- Approved by the Coordinated Entry Committee on October 22, 2020 for consideration by the Governance Advisory Board
- Approved by the Governance Advisory Board on October 27, 2020.

**Background Information:** HUD awarded the AZBOSCOG two DV Bonus Projects through the 2019 NOFA. Kingman Aid to Abused People (KAAP (Kingman/Mohave County) and Against Abuse (Casa Grande/Pinal County) are the two new subrecipients of the AZBOSCOG. As a result of these awards, Mohave and Pinal Local Continuum to End Homelessness (LCEH) must adjust coordinated entry activities to ensure compliance with confidentiality provisions that govern agencies that provide services to survivors (victims) of domestic violence.

Essentially the Violence Against Women Act (VAWA) prohibits any agency that receives VAWA funds from sharing, disclosing, or revealing personally identifying information into shared databases like HMIS. Both KAAP and Against Abuse receive VAWA funds.

The following links are provided as resources:

<https://www.federalregister.gov/documents/2016/11/16/2016-25888/violence-against-women-reauthorization-act-of-2013-implementation-in-hud-housing-programs>

<http://www.ncdsv.org/images/VAWAConfidentialityUpdateDec2005.pdf>

<https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-VSP-Comparable-Database-and-Reporting-Requirements.pdf>

**Purpose of Addendum:** The purpose of this addendum to the AZBOSCOG Coordinated Entry Policy is to provide guidance for the Mohave and Pinal LCEHs to develop policies that ensure that confidentiality of information is maintained related to survivors of domestic violence and continue to ensure a fair and transparent coordinated entry/case conference process with continued use of the By Name List and the prioritization process established in the AZBOSCOG Coordinated Policy.

**Caveats:** This addendum is the initial effort to provide guidance for the Mohave and Pinal LCEHs to implement a revised coordinated entry process that includes the DV Bonus Projects clients and RRH units. It is assumed that the policy and procedures to

integrate these programs into the LCEH will evolve. As a result, this addendum will be revisited at three and six months to make adjustments as needed so the that codified procedure is in alignment with actual practice.

### **Guiding Principles**

- Maintain confidentiality in compliance with VAWA and the AZBOSCOG policies.
- Ensure equity in access for the DV dedicated RRH units that will be administered by KAAP and Against Abuse.
- Ensure compliance with the AZBOSCOG CE Policy's prioritization requirements.
- KAAP and Against Abuse will maintain client level information in a comparable database Osnium that produces aggregate data that will be used by CRN to create CoC level reports including system performance measures. KAAP and Against Abuse will be required to generate aggregate data reports within timelines identified by CRN.

It is also recognized, in order to ensure the priority is housing eligible households in available units, some documentation processes will need to be completed manually until the technology protocols can be established.

The following is the broad process for implementation of the KAAP and Against Abuse RRH DV Bonus Projects.

Note: As soon as the contracts are executed between ADOH and the sub-recipients (KAAP and Against Abuse), the ADOH CoC Coordinator will arrange for a meeting that provides the sub-recipients and the LCEH-CE Leads with an overview of the requirements to be in compliance with the confidentiality requirements of VAWA.

1. Within seven working days of the execution of the contracts, the Pinal and Mohave LCEH—CE Committees must establish the initial access point that will be used to complete VI-SPDATS for households referred from KAAP and Against Abuse.
2. The identified access point will begin to complete VI-SPDATS manually (without inputting into HMIS). The access point will score the VI-SPDATS manually and create a By Name List. This will be completed on a bi-weekly basis. The By Name List will assign an identification number for each household with the matrix connecting the identification number and the family established outside of the By Name List and maintained and secured by one individual at the access point.
3. The identified individual from the access point and LCEH-CE Lead will meet to generate a By Name List that is limited to households that are eligible only to survivors

of domestic violence. Households that appear on the HMIS generated By Name List that meet the criteria of survivor of domestic violence will be determined by data points on the VI-SPDAT:

The individual from the access point and the LCEH-CE Lead will manually generate a blended By Name List between the two sources. This By Name List will not have identifying information used during the case conferencing and will be maintained using the same security and confidentiality requirements as if it was generated through HMIS.

4. The LCEH-CE Lead will convene a case conferencing that includes individuals from all referring agencies that have households on the By Name List. It is recognized that for case conferencing to work, additional information about the households will need to be discussed. No identifying information will be exchanged in writing and all participants in case conferencing will adhere to the standard of the HMIS confidentiality agreement.

5. The LCEH-CE Lead or the individual from the access point will reach back out to the referring agency so that the agency can engage the family to complete an intake for the housing unit based on the case conferencing process.

6. The ADOH CoC Coordinator will convene the sub-recipients and the LCEH-CE-Leads at three months post contract execution to discuss coordinated entry/case conferencing/BY Name List implementation. At that time, this addendum will be revised to reflect any changes that were needed to the process for it to be effective.