

OVERVIEW

The Maine Youth Coordinated Entry System (YCES) is comprised of statewide access and standardized assessment for all youth, as well as a coordinated referral and housing placement process to ensure that youth experiencing homelessness, per U.S. Department of Housing and Urban Development (HUD) Guidelines, receive appropriate assistance with both immediate and long-term housing and service needs. The entire YCES process, within the state of Maine with participation of its agencies and organizations, ensures a thorough, standardized process from initial engagement to successful housing placement. Individual YCES providers will still maintain their own admission processes and eligibility requirements, as required by each project's existing commitments. YCES will add a layer of collaboration to ensure that each youth experiencing homelessness is connected to the best available housing intervention for them.

The Maine Continuum of Care (MCoC) has adopted the Maine Youth Coordinated Entry System (YCES) to implement its coordinated housing and services components for youth experiencing homelessness.

Purpose and Background

HUD requires each CoC to establish and operate a “centralized or coordinated assessment system” (referred to as “coordinated entry” “CE” or “Coordinated Entry System” “CES”). Coordinated entry is an approach to coordination and management of a crisis response system's resources to efficiently and effectively connect people to interventions that will rapidly end their homelessness. Both the CoC and ESG Program Interim Rules require use of the CoC's coordinated entry process, provided that it meets HUD requirements. Coordinated entry processes are intended to help communities prioritize people who are most in need of assistance. They also provide information to CoCs and other stakeholders about service needs and gaps to help communities strategically allocate their current resources. The Youth Coordinated Entry System (YCES) is established in accordance with HUD guidelines that allow for a separate, parallel CES to be established to serve specific sub-populations.

This manual provides the policy and procedure framework for the Maine Youth Coordinated Entry System and serves the following purposes:

- Sets forth the policies governing Maine's Youth CE system.
- Provides all organizations in the homeless and social service systems with a basic overview of how Youth CE operates and what they can expect when engaging with the system.
- Provides an overview of what youth experiencing homelessness or a housing crisis can expect when engaging with Maine's Youth CE system.
- Documents all required CE policies by the Department of Housing and Urban Development (HUD), as described in CPD Notice 17-01: Notice Establishing Additional Requirements for a CoC Centralized or Coordinated Assessment System.

Core Requirements for a Coordinated Entry System¹

The CoC Program Interim Rule establishes minimum requirements that all coordinated entry processes must meet. Per the 24 CFR 578.7(a)(8) requirements and the 24 CFR 578.3 definition of a “centralized or coordinated assessment system”, a CoC’s coordinated entry process must:

- Cover the entire geographic area claimed by the CoC;
- Be easily accessed by individuals and families seeking housing or services;
- Be well-advertised;
- Include a comprehensive and standardized assessment tool;
- Provide an initial, comprehensive assessment of individuals and families for housing and services; and
- Include a specific policy to guide the operation of the centralized or coordinated assessment system to address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim specific providers.
- Individual CoC projects have ultimate responsibility for determining the eligibility of prospective participants in their programs and for collecting and maintaining eligibility documentation.

Guiding Principles for Maine’s Coordinated Entry System

The goal of Youth Coordinated Entry is to provide each youth with adequate services and supports to meet their housing needs, with a focus on diverting them from homelessness or returning them to housing as quickly as possible. Below are the guiding principles that will help Maine meet these goals.

- The YCES will operate with a youth -centered approach, and with youth -centered outcomes.
- The YCES will ensure that youth quickly receive access to the most appropriate services and housing resources available, including access to mainstream health services, social services, and employment programs.
- The YCES will reduce the stress of the experience of being homeless by limiting assessments and interviews to only the most pertinent information necessary to resolve the youth’s immediate housing crisis.
- The YCES will incorporate cultural and linguistic competencies in all engagement, assessment, and referral coordination activities.
- The YCES will utilize prioritization assessment(s) and a comprehensive case conferencing system to assess youth safety as the primary standard assessment mechanisms and will capture only the limited information necessary to determine the severity of the youth’s needs and the best referral strategy for them.
- The YCES will utilize HMIS for the purposes of managing participant information and facilitating quick access to available CoC resources.

The YCES will use and integrate a Housing First philosophy. In practice, this philosophy will work to ensure that regardless of any real or perceived presenting mental health or substance use issues, youth will be connected to housing as quickly as possible. Further, this Housing First philosophy will help to

¹ For more information, please refer to the *Coordinated Entry Core Elements* document, found here: <https://www.hudexchange.info/resource/5340/coordinated-entry-core-elements/>

ensure that youth presenting with the highest risk will be matched and connected with the most intensive interventions available.

Terms and Definitions²

211 Maine	211 is a free, confidential information and referral service that connects people of all ages across Maine to local services. Provides a 24/7/365 access point for YCES engagement and maintains an updated list of YCES providers and referral agencies.
Access Point	Access Point: Access points refer to how people experiencing a housing crisis learn that coordinated entry exists and are able to access crisis response services.
Chronically Homeless	HUD's definition: <i>Chronically homeless</i> means: (1) A "homeless individual with a disability," as defined in Section 401(9) of the McKinney-Vento Homeless Assistance Act, who: <ul style="list-style-type: none"> i. Lives in a place not meant for human habitation, a Safe Haven, or an emergency shelter; AND ii. Has been homeless continuously for at least 12 months, or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in (i) above.
Case Conferencing	Local process for CE participating providers to coordinate and discuss ongoing work with persons experiencing homelessness in the community, including the prioritization or active list. The goal of case conferencing is to provide holistic, coordinated, and integrated services across providers, and to reduce duplication.
Continuum of Care (CoC)	Group responsible for the implementation of the requirements of HUD's CoC Program interim rule. The CoC is composed of representatives of organizations, including nonprofit providers of services and/or housing for people experiencing homelessness, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless Veterans, and people who are currently experiencing, or have a history of, homelessness.

² Please note that HUD often updates definitions and terms, and the CES committee will aim to keep this document as up to date as possible. However, should the definitions listed here not reflect the most up to date HUD information, the HUD terms and definitions will be used in practice, rather than those listed here.

Continuum of Care Program	HUD-funded program to (1) promote communitywide commitment to the goal of ending homelessness; (2) provide funding for efforts by nonprofit providers, and state and local governments, to quickly rehouse individuals and families experiencing homelessness while minimizing the trauma and dislocation caused to individuals, families, and communities by homelessness; (3) promote access to and effect utilization of mainstream programs by individuals and families experiencing homelessness; and (4) optimize self-sufficiency among individuals and families experiencing homelessness.
Emergency Shelter	Short-term emergency housing available to persons experiencing homelessness.
Emergency Solutions Grant (ESG) Program	HUD-funded program to (1) engage individuals and families experiencing homelessness, including those living on the street; (2) improve the quantity and quality of emergency shelters for individuals and families experiencing homelessness; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly rehouse individuals and families experiencing homelessness; and (6) prevent families and individuals from becoming homeless.
Homeless Prevention	Housing relocation and stabilization services as necessary to prevent the individual or family from moving to an emergency shelter or a place not meant for human habitation.
Homeless Management Information System (HMIS)	Local information technology system used by a CoC to collect participant-level data and data on the provision of housing and services to homeless individuals and families and to persons at risk of homelessness. Each CoC is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards.
Host Homes	Community-based interventions which offer youth a place to live, in an unrelated adult's home, for a temporary period of time as they gain resources to either return to their parent/guardian for family reunification or gain independent living skills while working on goals for greater self-sufficiency.
Maine Service Hubs	Maine has nine Homeless Response Service Hubs that cover all 16 counties in Maine, each staffed by a Hub Coordinator. Hub Coordinators are responsible for coordinating and tracking system-wide efforts to achieve reductions in homelessness across the entire Hub, including managing the Coordinated Entry process.
Long Term Stayers	Long Term Stayers (LTS) were originally defined as people staying over 180 cumulative days in shelters or outdoors within a 365-day period (cumulative). Because of the success in housing this population, the definition was amended in March 2016 to the longest stayer in homelessness inside or outside as determined by local shelters for all parts of Maine except Portland. Portland retained the original definition.

Mobile Navigation and Diversion	Geographically nimble teams designed to respond to immediate housing issues and provide interventions which divert youth from involvement with the homeless response system.
Projects for Assistance in Transition from Homelessness (PATH)	Substance Abuse and Mental Health Services Administration (SAMHSA)– funded program to provide outreach and services to people with serious mental illness (SMI) who are homeless, in shelter or on the street, or at imminent risk of homelessness.
Public Housing Authority (PHA)	Local entity that administers public housing and Housing Choice Vouchers (HCV) (aka Section 8 vouchers).
Permanent Supportive Housing (PSH)	Permanent housing with indefinite leasing or rental assistance paired with supportive services to assist people experiencing homelessness with a disability, or families with an adult or child member with a disability, achieve housing stability.
Rapid Re-Housing (RRH)	Program emphasizing housing search and relocation services and short- and medium-term rental assistance to move persons and families experiencing homelessness (with or without a disability) as rapidly as possible into permanent housing.
Release of Information (ROI)	Written documentation signed by a participant to release personal information to authorized partners.
Transitional Housing (TH)	Program providing individuals and families experiencing homelessness with the interim stability and support to successfully move to and maintain permanent housing. Transitional housing funds may be used to cover the costs of up to 24 months of housing with accompanying supportive services. Program participants must have a lease (or sublease) or occupancy agreement in place when residing in transitional housing.
Youth	A person 24 years of age or younger who is unaccompanied by a parent or guardian and is without shelter where appropriate care and supervision are available, whose parent or legal guardian is unable or unwilling to provide shelter and care or who lacks a fixed, regular and adequate nighttime residence. "Homeless youth" does not include a person incarcerated or otherwise detained under federal or state law.
Youth Case Conferencing Group	A group consisting of representatives from referring CoC funded youth homeless services agencies in Maine, along with the Hub Coordinator. This group can be invited to consult on prioritization outside of the Mainstream Case Conferencing Group, in order to maintain youth privacy while making final referral recommendations.

Youth Homelessness Demonstration Program (YHDP)	The YHDP is an initiative designed to address systemic responses to youth homelessness and significantly reduce the number of youth experiencing homelessness in the United States. The YHDP is funded through HUD, and Maine received a YHDP award which began in 2021, resulting in six funded projects throughout the state. The official demonstration project ended in 2023, but HUD funding for these youth initiatives will continue through the CoC.
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Roles

CoC Board of Directors	Responsible for the general oversight of the CES, including the approval of the CE Policies & Procedures document.
Collaborative Applicant	Entity that must (at the request of the CoC Board and on behalf of the CoC) apply for certain types of HUD funding, including funding for coordinated entry and planning grants. Examples may include Youth Homelessness Demonstration Project or ESG funding.
HMIS Lead Agency	Operates the Homeless Management Information System on the CoC's behalf. Ensures the CE system has access to HMIS software and functionality for the collection, management, and analysis of data on persons served by coordinated entry. Entity designated by the CoC in accordance with HUD's CoC Program interim rule to operate the HMIS on the CoC's behalf. The HMIS Lead designated by the CoC may apply for CoC Program funds to establish and operate its HMIS.
Hub Coordinator	Responsible for hub-level operation and management of the Coordinated Entry System, specifically prioritization, managing the by-names list, and referral case conferencing.
Participant	An individual or family which accesses the CES, at any step in the process. "Participant" encompasses people for whom the following commonly used terms could apply: client, resident, guest, youth, etc.
Statewide Youth Action Board (YAB)	Serves as a representation of Maine youth voice and perspective derived from relevant lived experiences. Offers feedback and review of CE materials and procedures, as requested by the CoC.

CES Participating Provider	Provider agency or organization that has agreed to provide supports/services to people experiencing homelessness on behalf of the CoC. A CES participating provider must execute a CE Participation Agreement with the CoC, and signed annually. The Participation Agreement outlines the standards and expectations for the project's participation in, and compliance with, the policies and procedures governing the CES operations. In order to receive CoC, YHDP, or ESG Program funding from HUD, entities are required to participate in coordinated entry.
Referral Partner	A type of CES participating provider. Referral partners will receive and consider referrals for their project(s) from the CES. They will sign a Referral Partner Agreement with the CE management entity affirming it is aware of, and will adhere to, all expectations for coordinated entry.
Homeless Youth Provider Group (or, Youth Provider Group)	A formally recognized subcommittee of the Maine CoC, this group is intended to ensure shared language, vision and advocacy across sectors and youth providers in Maine, while centering youth voice and choice. This group also advises on and formally approves decisions for Youth Coordinated Entry in the state of Maine.
Policy Oversight Entity	The entity that is responsible for outlining the expectations for participation in coordinated entry. This includes CoC expectations for use of appropriate assessment tools, participation in case conferencing or other coordination mechanisms, use of the coordinated entry process to fill project vacancies or openings, addressing the safety needs of survivors of domestic violence, and the associated incentives or penalties associated with meeting or failing to meet those expectations.
Evaluation Entity	The entity responsible for the evaluation of the CES process of using participant and provider data to measure the functioning of the CE process.
Management Entity	The entity in charge of the day-to-day operation of coordinated entry involves staff, recordkeeping documentation, technology, and other infrastructure that supports the implementation of coordinated entry at the CoC or homeless system level.
Mainstream and/or Youth Services Provider	Agency or entity that can provide necessary services or assistance to people served by coordinated entry. Examples of mainstream and/or youth service providers include, but are not limited to, hospitals, mental health agencies, employment assistance programs, and schools.
U.S. Department of Housing and Urban Development (HUD)	Federal agency responsible for administering housing and homeless programs including the CoC and ESG Programs.
U.S. Department of Veteran Affairs (VA)	Federal agency responsible for providing health care and other services, including assistance to end homelessness, to Veterans and their families.

POLICIES AND PROCEDURES

Maine's Youth Coordinated Entry System (YCES) is designed to identify, engage, and assist youth experiencing homelessness, and ensure that those who request or need assistance are connected to appropriate resources. The YCES service coverage area is the entire geographical area of the state of Maine. The YCES aims to be easily accessible to all individuals and families experiencing homelessness, including those with disabilities. Primary access points will be the participating youth provider agencies. Any youth who contacts agencies participating in the mainstream Coordinated Entry System can also opt into being matched with a youth-specific housing resource.

Coordinated Entry is an opportunity for homeless service professionals to improve the quality, access, customer service experience, and coordination of services of Maine's homeless response network. YCES relies heavily on the competency, knowledge, experience, and fostered relationships of its providers and staff to improve entry, divert when assessed best practice, and soften landings to homelessness for youth. Coordinated Entry is a tool to help problem-solve individual, and often unique, issues in connecting youth to the best available resource. The Maine CoC strongly recommends CoC members, partners, and all other collaborative parties participate in a unified fashion.

Version

The Maine Youth Provider Group shall be responsible for the revision, review, and recommendation for approval of the YCES Policies & Procedures to the COC Board of Directors and the MCoC. The MCoC is committed to continuous improvement, and will review and revise this document as needed, and anyone who is interested in submitting suggestions for revisions to the document should submit them to Chair(s) of the Homeless Youth Provider Group.

Version	Date Approved	Key Updates
1	2/20/2020	Approved by MCoC
2	12/16/2021	MCoC Approved use of ME YYA CE Prioritization & Assessment Tool in place of TAY-VI-SPDAT
3	2/15/2024	MCoC Approved new Maine Youth & Young Adult Coordinated Assessment Tool and User Guide; and updated YCES Policies & Procedures Manual (which included updated language about Hub Coordinators taking an integral role in Youth Case Conferencing, decisions made by an ad hoc subcommittee of the Youth Provider Group as part of the Continuous Quality Improvement process of the Youth CES, and replacing grievance policy with MainStream CE grievance policy).

Coordinated Entry Participation and Coordination Policy

All CoC and ESG (24CFR§576.400(b) funded projects are required to participate in Coordinated Entry under 24 CFR 578.23(c)(9) and (11). The MCoC aims to have all homeless assistance projects participate

in its CES and will work with all local projects and funders in its geographic area, including VA-funded homeless programs and PATH outreach programs, to facilitate their participation in the CES.

The CoC is committed to aligning and coordinating all CES, including Youth CES, policies and procedures governing assessment, eligibility determinations, and prioritization with its written standards for administering CoC and ESG Programs funds, as required under 24 CFR 576.400(d) and (e) and 578.7(a)(9).

Fair and Equal Access Policy

All youth participating in any aspect of the YCES, such as access, assessment, prioritization, or referral, shall be afforded equal access to CE services and resources regardless of race, color, religion, national origin, gender identity, pregnancy, citizenship, familial status, marital status, household composition, disability, Veteran status, or sexual orientation. 211 is available by phone twenty-four hours a day with trained staff to assist persons and provide information about and/or referral to appropriate resources.

Nondiscrimination Policy

The YCES System supports the fact that all COC Program, ESG Program, and HOPWA Program funded projects are required to comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws, including the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, Title II and Title III of the Americans with Disabilities Act, and HUD's Equal Access Rule included in 24 CFR 5.105(a)(2), which prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender, or marital status. The CoC Program Interim Rule also contains a fair housing provision included in 24 CFR 578.93 (24 CFR 576.407(a) and (b) for ESG, and 24 CFR 574.603 for HOPWA).

Youth accessing the YCES are to be informed they have the ability to file a discrimination complaint. Discrimination complaints can be filed with the agency of the alleged complaint.

The YCES prioritization and referral processes comply with Federal, State, and local laws to ensure participants are not "steered" away or toward particular housing facilities or neighborhoods based on age, race, color, religion, national origin, physical or mental disability, sexual orientation, or gender identity in accordance with all relevant and applicable laws.

Low Barrier Policy

CoC providers will make enrollment determinations on the basis of limiting barriers to enrollment in services and housing. CoC projects and YCES participating providers may not screen potential clients out of assistance based on perceived barriers including, but not limited to: income; substance use disorder; domestic violence history; resistance to receiving services; the type or acuity of needed disability-related services or supports; history of evictions; poor credit; lease violations or history of not being a leaseholder; or criminal record. YCES access points which restrict access to resources based on specific client attributes or characteristics, must provide documentation to the MCoC which includes a justification for their enrollment policy.

Marketing Policy

The YCES is well advertised through the statewide 211 system, and the network of YCES participating programs, which are already part of the homeless system. Flyers are displayed at the physical location of YCES participating programs in a conspicuous location and are available throughout the community.

Each project participating in the YCES is required to post, or otherwise make publicly available, a notice provided by the MCoC that describes CE. This notice should be displayed at the physical location of YCES participating programs in a conspicuous location, such as waiting areas, as well as areas where people may congregate or receive services (I.e., dining halls). All YCES participating provider staff are required to know which personnel within their agency can discuss and explain CE to a participant who seeks more information.

ACCESS

No Wrong Door Approach³

The coverage area of YCES is the entire state of Maine. Access to the YCES follows a “No Wrong Door” approach, which ensures that youth have the same access to resources, referrals, assessments, and prioritization processes regardless of which homeless assistance provider they present at for assistance.

The principles of this approach are:

- Youth can seek emergency assistance through any of the CES access points, including 211 Maine, local Emergency Shelters, PATH, and other local outreach providers.
- All access points utilize the Maine Youth & Young Adult Coordinated Assessment Tool and provide standardized linkages to subpopulation access points and emergency service referrals; eligible youth will be referred to ESG or YHDP funded homeless youth agencies and, at the youth’s request, also have access to the housing resources of the mainstream Coordinated Entry System.
- Youth have equal access to information and advice about the housing assistance for which they are eligible, to assist them in making informed decisions about available services that best meet their needs and to address emergency and crisis needs, as applicable.

In some cases, youth may need additional accommodations to access the YCES. In these instances, the COC designates that:

- YCES participating providers provide linkages to communication accommodations through translation services to effectively and clearly communicate with people who need them, including visual, auditory, and limited English proficiency.
- It will be ensured that access to the YCES will be accessible to youth with mobility barriers.

Emergency Services

In case of emergency, call 911. After-hours housing crisis response access is available via telephone through 211, which can refer to police, and emergency medical care services for youth seeking

³ For more information on the No Wrong Door approach, please refer to the HUD CES Core Elements Document: <https://files.hudexchange.info/resources/documents/Coordinated-Entry-Core-Elements.pdf>

emergency housing assistance twenty-four hours a day year-round. This can include your local General Assistance office, 211 also coordinates with domestic violence providers, emergency services, shelters, and other housing crisis programs. The YCES system does not utilize prioritization to access emergency shelter services. However, each individual provider utilizes their own process for programmatic eligibility. It is important to note that due to the limited number of shelter beds in the state, it is possible that a bed might not be available for a youth when they are seeking it. In this case, providers will work to connect that youth with other resources to help address their immediate needs.

Diversion and Homeless Prevention

Acknowledging the potentially traumatic nature of literal homeless, providers will help youth to explore possible safe alternatives to emergency shelter. The YCES will ensure that all potentially eligible youth will be given the opportunity to explore options for diversion and homeless prevention, and screened for homelessness prevention assistance, regardless of the access point at which they initially seek assistance.

ASSESSMENT

All projects participating in Youth CE will follow the assessment and protocols of the YCES. The assessment process will collect only enough participant information to prioritize and refer people to available housing and support services.

Maine Youth CES Assessments

The assessment component of the coordinated entry process will be implemented in phases in order to capture information on an as-needed basis as youth navigate the process, recognizing that youth-centered and trauma-informed approaches are necessary throughout the CE process.

The following will be completed as a part of the YCES standardized assessment process:

Safety & Diversion Assessment: This first phase is intended to assess the immediate housing crisis, and determine if the youth can be diverted from, or must be directed towards, emergency services. YCES participating providers conducting the assessment will examine existing CoC and youth resources and all other options that could be used to divert the youth from entering the homeless system of care. This initial assessment will also be aimed at assessing the immediate safety of the youth. If a youth is presenting as fleeing, or attempting to flee from domestic violence, the entity doing the assessment will act in accordance with the Individuals and Families Fleeing Domestic Violence policy. See the ME YYA CE Assessment User Guide for more information about this assessment.

Maine Youth & Young Adult Coordinated Assessment Tool: Each youth is assessed for overall risk as related to their safety and health needs and their history of displacement/systems involvement using the Maine Youth & Young Adult Coordinated Assessment Tool. The tool will be completed when a youth is ready to begin exploring housing options and in accordance with the assessment policy and procedures outlined in this document. This assessment is meant to

collect information to identify a youth's housing and service needs with the intent to resolve that youth's housing crisis. This step may also include other Housing Barrier assessments necessary to refine, clarify, and verify the youth's housing and homeless history, barriers, goals, eligibility, and preferences. Please see the ME YYA CE Assessment User Guide for more information about conducting this assessment.

Data Collection: When a youth accesses emergency services, such as entering an emergency shelter or engaging with a homeless outreach team, basic Universal Data Elements (UDEs) will be collected. These UDEs include the youth's name, date of birth, social security number, living situation the night before accessing emergency services, and length of time homeless. Access points will also collect HMIS Common Data Elements and Universal Data Elements as necessary to enroll the youth in a crisis response project, such as emergency shelter or other homeless assistance projects.

Due to individual programmatic eligibility requirements, there may be further documentation necessary beyond this assessment process. Further information on a youth's eligibility for specific programs and resources will be determined in the referral phase of CE.

Assessment Criteria

In accordance with HUD guidance, the YCES includes a standardized assessment process, ensuring uniform decision-making and coordination of care for persons experiencing a housing crisis. The Maine Youth & Young Adult Coordinated Assessment Tool screens for risk based on the youth's current ability to meet their health and safety needs as well as any previous history of displacement or system involvement.

The Maine Youth & Young Adult Coordinated Assessment Tool is administered by providers for young people experiencing homelessness and mainstream providers, in accordance with the written standards, and is the approved prioritization tool for all homeless services providers wishing to refer a youth to a YCES housing resource. Based on a youth's answers to the specific set of questions inherent in the tool, a youth will be given a score.

If a trained provider believes the assessment does not accurately reflect the youth's situation, the score can be adjusted on a case-by-case basis, through discussion with the case conferencing group. The Maine Youth & Young Adult Coordinated Assessment Tool can only be conducted by a provider who has been appropriately trained to use this tool. Any adjustment in score will focus on safety considerations for the youth being assessed that are not reflected in the ME YYA CE Prioritization & Assessment Tool questions.

Youth have the right to refuse to answer any assessment questions. If there is a youth experiencing homelessness that declines to complete the Maine Youth & Young Adult Coordinated Assessment Tool, that youth will remain unscored. If this is the case, case conferencing and length of time homeless will be used to help establish prioritization for that youth. The case conferencing group will make every effort to ensure that the youth is not negatively impacted by their refusal, however this refusal may impact a youth's eligibility for individual programs in the referral phase.

All CES participating providers must use the standardized assessment methodology, to ensure that all youth served are assessed in a consistent manner, using the same process.

Privacy Protection

CES participating providers are required to notify and obtain consent for the collection, use, and disclosure of youths' Personally Identifiable Information (PII).

Disclosure

Throughout the assessment process, youth must not be pressured or forced to provide CES participating providers with information that they do not wish to disclose, including specific disability or medical diagnosis information.

Updated Participant Information

CES participant information will be updated regularly based on existing programmatic policies and procedures. Additionally, CES participating providers may update youth participant records with additional and/or revised information as it becomes available and/or known to them.

Youth who choose not to participate in data collection upon initial assessment or project entry may later decide that their information can be collected and entered into HMIS. Youth data in HMIS can be updated after an initial CE data collection period, and throughout project enrollment to reflect emergence of new information, corrections to previously collected information, or additions of previously unanswered questions. CES participating providers should continuously work to improve youth engagement strategies to achieve completion rates of required HMIS data elements that are as high as possible.

Participant Consent

As part of the assessment process, participants will be provided with a written copy of the Maine's HMIS Authorization to Disclose Information form (Exhibit A), which identifies what data will be collected, what data will be shared, agencies with whom the data will be shared, and the purpose of said data sharing. Youth must opt in to sharing data. Refraining from data sharing does not affect eligibility for YCES, or the resources which it encompasses.

PRIORITIZATION

YCES will use data collected through the assessment process to prioritize youth experiencing homelessness within the YCES's geography for available housing resources. Emergency services are a critical crisis response resource and access to such services will not be prioritized.

Once the assessment has been completed, each youth who may be eligible for COC-funded, youth-specific housing resources will be placed on a centralized prioritization list, managed by the Hub Coordinator in the hub where the youth wishes to reside. Youth open to living in multiple areas of the state will be placed on the centralized prioritization list for multiple hubs. It is the responsibility of the

referring agency to inform Hub Coordinators if a youth is no longer eligible for, or no longer wishes to seek housing within their hub. This list will ensure that those with the highest score are prioritized for resources and that their wait times are as short as possible.

YCES is committed to continuous improvement and will consider including other factors in the prioritization formula, such as housing barriers and potential eligibility factors, as the system develops.

YCES will use a dynamic prioritization approach and a case conferencing structure, which will allow for flexibility when prioritizing youth for particular housing interventions. Dynamic prioritization will allow for those experiencing homelessness to be prioritized for available housing interventions even if another resource would be ideal. (For example, a youth prioritized for PSH may be offered a RRH intervention, as to decrease wait time and connect the youth to permanent housing as soon as possible.)

The Case Conferencing Group will meet regularly (as determined by each individual hub), and all YCES participating providers will be invited to attend. At case conferencing meetings, the Group will discuss youth on the prioritization list, their respective assessment score, and any recent updates to their situations that might impact their prioritization. This discussion will focus on any considerations that are not accounted for in the Maine Youth & Young Adult Coordinated Assessment Tool. Then the Group will choose which to refer for housing resources that may come available soon. The Hub Coordinator will then facilitate the referral process when applicable.

Where possible and reasonable, the Case Conferencing Group may consider provider eligibility requirements (e.g., chronic homelessness) before deciding upon referrals. However, it remains the responsibility of the provider receiving the referral to determine and document the eligibility of the youth referred through YCES, in accordance with its funding requirements and governance.

Should the need arise, Hub coordinators will facilitate a separate and private youth Case Conferencing session to allow for open conversation and case planning that does not violate youth confidentiality, or otherwise cause un-interested parties to become aware of the details of their personal and private situations.

REFERRAL

All CoC, ESG, and YHDP program recipients and subrecipients that provide specific services to youth experiencing homelessness will use the YCES established by the CoC as the only referral source from which to fill vacancies in housing and/or services funded by CoC, ESG, and YHDP programs.

When the case conference identifies a youth to be referred to a particular housing resource, the Hub Coordinator will facilitate connection and communication between the identified youth, their caseworkers, and the housing resource(s) in question.

Referral Rejection Policy

Youth Declined Referral: One of the guiding principles of CE is participant choice. This principle must be evident throughout the CE process, including the referral phase. Youth in the YCES can reject service strategies and housing options offered to them, without repercussion.

Provider Declined Referral: There may be instances when agencies decide not to accept a referral from the YCES. When a provider agency declines to accept a referred prioritized household into its project, the agency must notify the Hub Coordinator of the denial and the reason for the denial.

Refusals by projects are acceptable only in certain situations, including these:

- The youth does not meet the project's eligibility criteria.
- The youth would be a danger to self or others if allowed to stay at this particular project.
- The services available through the project are not sufficient to address the intensity and scope of the youth's need.
- The project is at capacity and is not available to accept referrals at this time.
- Other justifications as specified by the project and the MCoC.

The agency must notify the Hub Coordinator why the referral was rejected, how the referred youth was informed, what alternative resources were made available to the youth, and whether the project staff foresee additional, similar refusals occurring in the future. This information will then be shared with the case conferencing group, which will discuss and decide on the most appropriate next steps for both the project and the youth.

DATA MANAGEMENT

All youth information collected, stored, or shared due to participation in the YCES, regardless of whether data is stored in HMIS, shall be considered personal and sensitive information worthy of protection and security associated with data collected, stored, or shared in HMIS.

All YCES participating providers must ensure participants' data is secured regardless of the systems in which or locations where participant data are collected, stored, or shared, whether on paper or electronically.

YCES participating providers must collect all data required for CE at each step of the YCES process.

Data must not be collected without the consent of youth, according to the defined privacy policies adopted by the CoC. Participants must be informed how their data is being collected, stored, managed, and potentially shared, with whom, and for what purpose.

Maine HMIS Authorization for Disclosure of Health and/or Personal Information (ROI)

Participants must receive and acknowledge an HMIS Release of Information (ROI) form prior to the collection of data for YCES. The form identifies what data will be collected, the purposes for collecting that data, and who has access to that data. Youth must sign this release in order to opt in to sharing data in HMIS with other providers.

The Maine YCES does not require disclosure of specific disabilities or diagnoses to access the system. This information may only be obtained for determining program eligibility and making appropriate referrals.

Privacy Protections

The CoC must protect all participants' personally identifiable information (PII), as required by HUD's HMIS Data and Technical Standards, regardless of whether or not PII is stored in HMIS. All Youth CE participating providers will ensure participants' PII will only be collected, managed, reported, and potentially shared if those data are able to be secured in compliance with the HUD-established HMIS Privacy and Security requirements. The MCoC requires adequate privacy protections of all participant information per 24 CFR 578.7(a)(8) and the CoC Program Interim Rule HMIS Data and Technical Standards.

Maine YCES operations and YCES participating providers must abide by all Federal and State defined privacy protections, included in and defined by the HMIS End User Agreement. Consent protocols, data use agreements, data disclosure policies, and other privacy protections will be offered to program participants upon entry into YCES.

Participants will be informed of the privacy rules associated with collection, management, and reporting of data through the YCES. In order to engage in case conferencing, all YCES providers must have participating youth consent to sharing of certain information through the Maine Coordinated Entry System Authorization to Release Information (ME CES ROI).

The YCES ROI will allow YCES providers to share only the information necessary for prioritization and referral to an appropriate program. PII such as the youth's name will not be included in the case conferencing or prioritization process. Youth who want to access housing resources through the mainstream coordinated entry system can opt to have some of their data made visible to other youth and adult providers.

The prioritization list will be maintained regionally by the Hub Coordinator; it will be available to be viewed at case conferences and will otherwise be maintained in a locked electronic file which can be accessed only by participating CES providers.

HMIS Data Systems Procedures

Maine Homeless Providers (excluding DV providers) utilize a homeless database program called the Homeless Management Information System (HMIS). The HMIS system manages data, including data related to the CES, and is administered by MaineHousing. Data collected and managed in HMIS is defined by the CoC at each step of the CES process.

Youth assessments must be recorded in HMIS in accordance with the MCoC Data Quality and Best Practice Guide.

EVALUATION

Regular and ongoing evaluation of the YCES will be conducted to ensure that improvement opportunities are identified, that results are shared and understood, and that the YCES is held accountable, where appropriate and applicable.

The System Performance Measures, including as they are affected by the YCES, will be evaluated using HMIS data on a quarterly basis by the CoC Board of Directors. After review by the CE Committee and the CoC Board of Directors, results will be published on the public MCoC website.

Participating Provider Evaluation

YCES participating providers play a crucial role in the evaluation of the YCES. YCES participating providers will collect accurate and meaningful data on youth served by the YCES. In addition, YCES participating providers will review evaluation results and offer insights about potential improvements to the YCES processes and operations. This will be collected through electronic HMIS user-group surveys. Policies and procedures will be reviewed and updated at least annually based on evaluation and feedback.

Participant Evaluation

The Youth Provider Group will evaluate the effectiveness of its YCES using participant feedback, including:

- Appropriateness of questions asked on assessment;
- Effectiveness of process to find and secure referrals; and
- Satisfaction with placement.

Participant feedback can be accepted at any time from participating providers. Participant grievances will also be incorporated into any feedback evaluation. At regular intervals, the Youth Provider Group will issue a participant feedback survey. This survey will be in the field for at least two weeks, after which time the results will be collated and reported out on the Maine Homeless Planning public website.

APPENDIX A.

Grievance and Appeal Policy and Procedure

All participants and programs involved in the CES must be afforded the right to submit grievances against providers or the CES itself, and must be afforded the right to appeal decisions made by the providers or by CES. As a publicly supported process, the CES must also allow grievances from outside parties. This section will enumerate the processes by which grievances and/or appeals will follow.

In all cases, a grievance can encompass any aspect of the CES process with which the aggrieved participant or program is not satisfied. Every effort should be made to resolve grievances informally, before a formal grievance process is initiated. In the instances where the aggrieved party is dissatisfied with a decision made by a program or the CES, this dissatisfaction would amount to an appeal of that decision. While the terms are distinct, the process for addressing these is the same.

Scope

These procedures shall address grievances and appeals of the CES itself. Any program or person who interacts with the Coordinated Entry System may file an appeal, regardless of whether or not the program or person is participating in the CES. Each participating program must have its own internal grievance and appeal process. In instances where the aggrieved party's complaint involves a program level decision, or the actions of a program staff, then that program's grievance and appeal policy shall be used. CES grievance and appeal procedures will be utilized when the complaint pertains to the one or more of the following:

- Access to Coordinated Entry System (i.e. participant encounters a barrier to CES Access)
- Assessment (e.g. no assessment provided)
- Prioritization (e.g. disagreement with housing designation)
- Housing referral (e.g. lack of follow through from housing provider)
- Other (please be specific)

The grievance may also pertain to actions or decisions of the CoC Project Coordinator, or the case conferencing group, in respect to the operation of the Coordinated Entry System. If it is uncertain whether the grievance is program related or system related, the Project Coordinator and a representative from the agency in question will make a determination. Participants are welcome to have an advocate, such as a caseworker, available to support them through the entirety of the process, if this is what they wish.

Participant/Citizen grievance and appeal

Step One Grievance/Appeal

Each participant will have the opportunity to resolve any complaints through an informal conversation, during which the aggrieved person will have an opportunity to express their concerns and have them addressed. This informal conversation should take place within 10 business days of the occurrence of the CES process in question. If a solution is unable to be reached, the participant will have the right to the official grievance and appeal process. Participants will be able to move right to the formal process, if that is what they wish.

If the party chooses to carry their grievance forward, at this point they shall complete a CES Grievance Form. This form will detail the nature of the grievance and include all supporting evidence for the grievance. The form shall be written in a manner that will allow people to complete and submit the form without assistance if necessary, but people may accept the assistance of a caseworker in completing and submitting the form as well. This form should be submitted within 10 business days of the informal conversation. The grieved party is welcome to submit any supporting written materials with the form, should they wish.

The completed CES Grievance Form will be transmitted to the coordinated entry email listserv at Maine Housing. A member of that listserv will then notify members of the appeal hearing

pool that a grievance had been received. This appeal hearing pool will consist of all 9 Hub Coordinators and the tri-chairs of the CES committee. The appeal hearing meeting must occur within 10 business days of the CES Grievance Form being received. Appeals will be heard by two available Hub Coordinators and one CES Tri-Chair. Program participants will be given the opportunity to provide verbal testimony to the hearing group. A ten-minute time frame will be allowed to present the grievance or appeal directly to the group. The hearing group will specify the time and date for that testimony. The verbal testimony must be provided within the ten (10) business days hearing window.

In the case of an appeal, the original decision will be either upheld or overturned. In the case of other grievances, the grievance will be held to be either founded or unfounded. If founded, the Project Coordinator will consult with the MCOC Tri-Chairs to determine what corrective actions must be taken.

In all cases, the aggrieved party will be informed of the decision in writing within ten (10) business days of the filed grievance. The notice of decision will also include information about what next steps may occur. If the person is still dissatisfied with the decision, they may choose to escalate their grievance or appeal.

Step Two Grievance/ Appeal

In cases where the aggrieved party is not satisfied with the decision of the Step One process, they may escalate their grievance/appeal.

The party will send their Grievance Form, supporting evidence, and a copy of the Step One decision to the COC Tri-Chairs within 10 business days of the Step One decision. The aggrieved person will be given the opportunity to provide verbal testimony to the hearing to the CoC Tri-Chairs. A ten-minute time frame will be allowed to present their grievance or appeal directly to the group. The CoC Tri-Chairs will specify the time and date for that testimony. The verbal testimony must be provided within the ten (10) day hearing window.

The Tri-Chairs shall consider the evidence and choose to either uphold or overturn the Step One decision. If the appeal involves an agency represented by one of the Tri-Chairs, that chair shall recuse themselves from the process. This decision must be rendered within 10 business days of the Step Two process being initiated. The aggrieved party will be informed of this decision in writing. All decisions at this stage are considered final.

Program Grievance vs CES

In the case of a program wishing to lodge a grievance against the CES, a similar process shall be followed. This process is to address interagency concerns; a program may not use this process to file a grievance or appeal on behalf of an individual participant.

Step One Grievance/Appeal

The aggrieved agency shall compose a formal letter that details the nature of the grievance or appeal, and include all supporting evidence. This letter and evidence shall be sent to the CES Committee Chairs. In the case that the grievance involves a CES Chair's agency, the complaint will be forwarded to the CoC Tri-Chairs, who will then hear the appeal.

The complaint and supporting evidence will be considered by the appropriate group as detailed above, who will render a decision within 30 days. The group hearing the appeal will also make any decision on corrective actions if necessary. This group will notify the aggrieved agency in writing as soon as a decision is made, as well as what next steps may occur.

Step Two Grievance/Appeal

If the aggrieved agency is not satisfied with the decision of the Step One group, they may choose to escalate the complaint to Step Two. The agency must submit a Step Two complaint within 30 days of receiving notice of the Step One decision.

A Step Two agency complaint will be sent to the CoC Board President. It will take the form of a formal letter detailing the initial grievance or appeal, supporting evidence, and a copy of the Step One decision.

The Step Two complaint will be considered by the CoC Board at their next regular meeting. If the complaint is received less than five (5) business days prior to the next meeting, the Board may opt to defer the consideration until the following meeting. Any members of the Board whose agencies are involved in the complaint will recuse themselves from the process. The Board shall render a decision, and determine any corrective action if necessary. This will be communicated with all involved parties within five (5) working days of the meeting. All decisions at this level are considered final.

Recordkeeping

The CoC Project Coordinator shall keep records of all CES grievances/appeals, and their results. Those records shall be forwarded to the Evaluation Entity, the CES Committee, CoC or CoC Board at their request. Records of grievances and appeals shall be kept without participant PII; only aggregate data with unique identifiers will be kept to preserve participant confidentiality. As part of the regular quarterly reporting, the CE Operator will present the number and disposition of all appeals and grievances to the CE Committee, as well as the CoC and CoC Board.

Affirmative Outreach

All participants in the Coordinated Entry System must be made aware of their rights to file grievances and appeal CES decisions. CES will provide all CES participating providers with language that can be included in existing outreach documentation, and/or outreach materials. Information about CES grievances and appeals can be posted publicly at CES access points, or given directly to the participant upon their initial assessment.

APPENDIX B.

Maine Youth & Young Adult Coordinated Entry Assessment Tool

Appendix C.

MCO Youth & Young Adult Prioritization Tool User's Guide

Appendix D.

Maine HMIS Authorization to Disclose Information Form

Appendix E

MAINE Continuum of Care (MCoC) COORDINATED ENTRY SYSTEM (MCES) & Service Hub Case Conferencing Release of Information