



CHITTENDEN COUNTY HOMELESS ALLIANCE NOTICE OF RIGHTS FOR COORDINATED ENTRY PARTICIPANTS

What is Coordinated Entry?

Coordinated Entry (CE) is a system for accessing housing and supportive services for people who are homeless or at risk of homelessness. The U.S. Department of Housing and Urban Development (HUD) requires all Continuums of Care (CoCs), including the Chittenden County Homeless Alliance (CCHA), to have a coordinated entry system (CES) and grievance policy. “HUD’s primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that it be easily accessible no matter where or how people present.”¹ CE uses standardized population-specific assessment tools and a uniform prioritization policy so that all households experiencing homelessness have equal and fair access to resources. Eligibility for specific projects is determined by the projects themselves, not through CE. CE systems and participating projects must comply with applicable federal and state laws. This notice explains your grievance rights for the Coordinated Entry System under CCHA’s Grievance Policy and under federal and state civil rights and fair housing laws.

If you have a grievance with a particular agency or representative of an agency that participates in CE, you should direct your complaint to that agency.

Protections for Coordinated Entry Participants

You have three sets of rights under the CES: (1) basic fair treatment under the CES; (2) nondiscrimination; and (3) confidentiality. If you have any problems with the Coordinated Entry process, you may want to try to find a resolution directly with the person or agency completing your Initial Screening Form or Housing Assessment.

1. You have a right to be treated fairly in the Coordinated Entry System.

You have the right to participate in CE if you live in Chittenden County and are experiencing homelessness. You have the right to have your needs evaluated using the same population-specific assessment tool as other similarly situated individuals and families participating in CE. You have the right to standardized prioritization in the referral process to housing and other services.

If you think that these rights have been violated, you have a right to file a grievance through the Coordinated Entry System. This grievance process discussed here is limited to problems with the Coordinated Entry System itself. If you have a grievance with a particular agency or representative of an agency that participates in CE, you should direct your complaint to that agency.

¹ The Department of Housing and Urban Development, *Coordinated Entry Policy Brief* (2015).

You have the right to be assisted by an advocate, like a friend, family member, agency staff, or attorney. You have the right to review any documents related to your case (except to the extent that they contain confidential information about other persons) by making such a request to the CES Administrator. You have the right to have your grievance addressed in a fair and timely manner. You have the right to have a decision-maker who is not the person (or a subordinate of the person) who engaged in the action or inaction that is the reason for your complaint. If you have a physical or mental condition that makes it hard for you to participate in the grievance process (like hearing, seeing, or managing administrative tasks), you have a right to a “reasonable accommodation.” A reasonable accommodation is a change in rules or practices to make this program more accessible if you have a disability. For instance, you can ask us to provide you with large font documents, additional time, and so forth. If you have limited English proficiency or are Deaf or hard of hearing, you have a right to have an interpreter provided for you at no cost to you.

To file a complaint, contact the CCHA CES Administrator, Chris Brzovic, at cbrzovic@cvoeo.org or 802-863-6248 x723. If your complaint is directly related to Chris Brzovic, the CCHA CES Administrator, contact the CCHA Coordinator, Paddy Shea at pshea@vhfa.org or 802-652-3428. You can use the attached Coordinated Entry Complaint Form or provide a brief summary of the alleged violation and your contact information. If you need help filling out the form or need an interpreter, contact Chris Brzovic or Paddy Shea. You can also call Vermont Legal Aid for help at 800-889-2047.

If the CES Administrator or CCHA Coordinator determines that the grievance is not related to CE, you will be notified of the same and informed of the appropriate venue for your complaint.

Your complaint will be investigated by a neutral third party and you may be contacted for additional information. An informal hearing with you and the service provider(s) at issue will be scheduled. At the hearing, you will have the opportunity to present written or oral evidence and arguments. Within 10 business days of the hearing, the hearing officer will send you and the appropriate service provider(s) a written decision setting forth a recommended resolution and advising you of your appeal rights.

2. CES and participating agencies must comply with applicable civil rights and fair housing laws and requirements.

You are protected from discrimination by federal and state civil rights and fair housing laws, specifically:

- The Fair Housing Act protects CE participants from discriminatory practices based on race, color, religion, sex, national origin, disability, or family status;
- Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability;
- Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin, and requires you to be provided with meaningful access to CE if you are a person with limited English proficiency;

- The Americans with Disabilities Act prohibits CE from discriminating against persons with disabilities and requires CE to provide reasonable accommodations to persons with disabilities to afford them equal access to services;
- The Equal Access Rule prohibits discrimination against individuals based on actual or perceived sexual orientation, gender identity, or marital status;
- The Violence Against Women Act bars discrimination against victims of domestic violence, dating violence, sexual assault, and stalking; and
- The Vermont Fair Housing and Public Accommodations Act prohibits discrimination based on race, creed, color, national origin, marital status, sex, sexual orientation, gender identity, or disability, and it requires the CES to provide reasonable accommodations in policies, practices, or procedures in order to offer persons with disabilities equal access to services.

If you were discriminated against based on a protected status, you have a right to file a discrimination complaint directly with HUD, file a discrimination complaint with the Vermont Human Rights Commission, or file a complaint in federal or state court. You can call Vermont Legal Aid at 800-889-2047 for help.

- To file a complaint with HUD, you can call HUD at 1-800-669-977, file by mail at HUD Boston FHEO Center, 10 Causeway Street, Suite 308, Boston, Massachusetts 02222, or file online at www.hud.gov.
- To file a complaint with the Vermont Human Rights Commission, call the HRC at 802-828-1625. You can also file online at hrc.vermont.gov or send your complaint by mail to the Vermont Human Rights Commission, 14-16 Baldwin Street, Montpelier, VT 05633-6301.

3. You have confidentiality rights.

You have the right to have your information kept private unless you authorize disclosure of information and/or records. Several laws protect this right, including:

- HUD's Homeless Management Information System rules and regulations set data security standards and fair information practices that bar disclosure of information without authorization;
- The Health Insurance Portability and Accountability Act (HIPAA) protects disclosure of health information without a written release;
- The Confidentiality of Alcohol and Drug Abuse Patient Records regulation specifies restrictions concerning the disclosure and use of patient records that include information on substance use diagnoses or services, including protecting against redisclosure of information absent specific written authorization;
- The Violence Against Women Act provides strict confidentiality requirements for information related to a person's status as a victim of domestic violence, dating violence, sexual assault, or stalking, mandating written authorization to release information and for such information to be retained separately from the rest of a client's file.

If your confidentiality rights were violated, you can file a complaint using the grievance process described above, or you may be able to seek a remedy in court whether or not you use the CES Grievance Process. Call Vermont Legal Aid at 800-889-2047 for help.