



COORDINATED ASSESSMENT: MEETING THE NEEDS OF HOMELESS DOMESTIC VIOLENCE VICTIMS

In 2012, HUD issued an interim rule on the Continuum of Care (CoC) process for McKinney-Vento homelessness programs, outlining, among other things, the basic requirements for a “coordinated assessment” or “centralized intake” process for determining eligibility and providing services through HUD-funded programs. NNEDV submitted comments on the interim rule in November of 2012.

According to the interim rule the basic minimum requirements for the Continuum’s centralized or coordinated assessment system is: *a centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals . . . [which] covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.*

The interim rule proposes allowing domestic violence and other victim service providers to opt out of the coordinated assessment system, citing safety concerns for victims. Advocates are waiting for the final rule for clarity on the requirements for victim services providers.

HUD intends to re-open the CoC Program interim rule for public comments after CoCs, recipients, and subrecipients have had an opportunity to administer the program for some time under the interim rule program requirements. While the interim rule is in effect, advocates should document concerns or barriers and communicate such information to NNEDV at advocacy@nnedv.org.

In the meantime, advocates should work in their communities to ensure that coordinated assessment systems meet the needs of victims, maintain confidentiality, reduce trauma, and increase victims’ access to housing resources. As victims access both victim service programs and general housing and homelessness programs, these policies must be present in systems that include victim service providers and those that do not.

At a minimum, such coordinated assessment systems must:

- be built on shared tools and standards, not shared databases or other structures that inherently expose victims to unnecessary danger;
- meaningfully and significantly involve victim service providers in their design and implementation;
- proactively address safety and privacy concerns;
- adhere to confidentiality and safety policies with regard to record-keeping or sharing and physical locations;
- and allow direct, immediate access to safe housing for victims.

Victim service providers should be involved in ensuring that the main coordinated assessment is safe for victims but barriers may continue to make full participation untenable. Therefore, NNEDV believes that victim service providers should retain the ability to opt out of participation in coordinated assessment and should not have to develop a parallel system. Of course, domestic violence providers should be given the option to participate fully in their community’s single coordinated assessment system, if desired, as long as such participation does not compromise survivor safety and/or violate any confidentiality requirements. It is imperative that victim advocates are significantly involved in the design of such systems to ensure that victims’ needs are considered and addressed.