



Recommendations for CE Policy and Procedures

Purpose

The following recommendations for Coordinated Entry (CE) Policies and Procedures are informed by expert technical assistance and guidance provided by the U.S. Department of Housing and Urban Development (HUD).

The following recommendations were previously shared during CE Oversight Committee meetings, but are not reflected in the Policies and Procedures before you.

OHS Recommendations

Recommendations are focused on allowing for flexibility concerning the life, health, and safety of our community.

Amendments to CE P&P:

- Coordinated Entry Policies and Procedures apply only to COC funded programs.
- Prioritization and referrals only apply to COC funded programs, but can be complimented by other resources as available.
- For encampment prioritization, include the word “temporarily” prioritized. Meaning, they do not always receive priority, only in the strategic performance of encampment surges.

2025 CE Policies and Procedures Recommendations:

* The CE Lead may revise protocols as necessary to ensure timely and effective responses to newly identified high-risk populations or the introduction of new, potentially time-limited funding opportunities. Such revisions are intended to support system responsiveness and resource alignment in a dynamic service environment. All modifications will be presented at the next scheduled CE Oversight Committee meeting, with an opportunity provided for public comment.

Justification

This statement was reviewed by a Technical Assistance (TA) Consultant with 23 years of HUD TA expertise. It affirms the necessity for CE to respond swiftly in making lifesaving resources

available in urgent situations, particularly to protect individuals identified as the most vulnerable. These actions are intended solely for addressing immediate needs and emergency circumstances and are not designed to serve as permanent policy changes.

Encampment Prioritization

Based on the Nashville-Davidson County Outdoor Homeless Strategy, CE considers individuals residing in encampments as high priority households. Individuals identified and included in the encampment surge By-Name List (BNL) will be prioritized for available community resources. The existing CE prioritization protocol will remain for those residing in other encampments or unsheltered.

Justification

Expert technical assistance highlights that individuals living in encampments are among the most vulnerable in our communities. They face constant exposure to the elements, limited access to healthcare, and high risks of illness, trauma, and displacement. Their visibility underscores systemic gaps, making it critical to respond with urgency, compassion, and long-term solutions - including housing and supportive services. Nashville historically has not addressed unsheltered, encampments, or the hardest to serve as evidenced by the lack of data collection and poor CE entry

The suggested revisions from the CE Oversight Committee for encampment prioritization in the 2025 CE Policies and Procedures do not align with the community's formally approved *Outdoor Homelessness Strategy*. Adoption of language that contradicts this strategy may hinder our ability, particularly that of the CoC, to apply for or receive funding from HUD. For example, prior to the adoption of the current strategy, the community did not receive a funding opportunity under a special HUD notice due to lack of coordination and strategic alignment.

In addition, the proposed language raises concerns about adherence to trauma-informed practices. Notifying committees through public meetings prior to informing residents of identified encampments creates unnecessary risks and erodes trust. This approach has previously led to negative outcomes during past encampment closures and should not be repeated.

For these reasons, we recommend that any changes to CE Policies and Procedures be closely aligned with the existing Outdoor Homelessness Strategy and trauma-informed best practices. Doing so will better support both community trust and access to critical funding opportunities.

Recommendations allow for the following:

- **Proper Notification**
- **Quick response time**
- **Does not splinter resources**
- **Informed by expert technical assistance**
- **Does not conflict with Outdoor Homelessness Strategy**

- **Considers the financial/federal policy changes**
- **Flexibility in the needs for life, health, and safety**

Recommendations for Next Steps

- Domestic Violence Coordinated Entry (DVCE) Policies and Procedures to be reviewed
 - o Aligning the general CE Policies and Procedures with the DVCE Policies and Procedures is essential to ensure clarity, consistency, and compliance across the system.
- Needs Assessment for Secure Housing (NASH) Assessment Tool
- We are asking HPC to consider OHS's recommendations prior to voting today

Reference Page

2023 Approved CE Policies and Procedures Aligned with HUD's Recommendations

ENCAMPMENT PRIORITIZATION

Outdoor homelessness has continued to grow in Nashville and a new state law has been enacted to further penalize camping on public lands and reducing options for where households can camp safely. In response, the following adjustments are being made to the CE prioritization protocol. These changes will increase Nashville's capacity to refer households from encampments directly to housing resources.

The CE definition of an individual household includes an individual over the age of 18 and any household configuration with no minor children. The following categories will be considered high priority households. The CE definition of an encampment is as defined by Nashville's Outdoor Homelessness Strategy guide.

1. Individuals living in an encampment identified to MHID for closure by law enforcement
 - a. Existing CE prioritization protocol will remain established regarding encampments with more than 1 resident
 - b. Updates to prioritization will encompass prioritization pools made from the By Name List and for any relevant Interest List

The updates to individual prioritization will ensure that CE meets the immediate crisis for households living in encampments.

The updates were made in conjunction with HUD TA, the community encampment response workshop and Emergency Task force. Updated encampment prioritization was implemented July 2022. CE will continue to coordinate with the Prioritization Encampment Assessment Team as designated by the Outdoor Homelessness Strategy regarding prioritized encampments.

CE Oversight Committee Recommendations:

*In the event that circumstances or conditions identified by the CE Lead call for a shift in prioritization and/or allocation of CE resources, the CE lead must engage the CE Oversight Committee for review and potential approval. This discussion may occur during the next scheduled CE Oversight Committee meeting or, if necessary, during a special called meeting on a case-by-case basis. Public notice will be provided along with an opportunity for public comment.

Any such changes should be limited in scope and duration and must be reported to the CoC General Membership and the Homelessness Planning Council. These temporary adjustments will be evaluated for inclusion as permanent changes during the next formal revision of the CE Policies and Procedures Manual. All decisions will remain person-centered, transparent, and responsive to emerging community needs.

Approved proposals may have immediate effect; however, households referred already through CE would not have their referrals rescinded.

Encampment Prioritization

At this time, Nashville-Davidson County's CE does not include additional prioritization for individuals residing in encampments. This decision reflects a person-centered commitment to equitable access for all populations experiencing unsheltered homelessness.

Any future considerations of encampment prioritization will be reviewed during CE Policies and Procedures revisions, in coordination with the Shelter, Weather, Outreach, and Prevention (SWOP) Committee, and with an opportunity to assess how the CE Oversight Committee may be incorporated into the broader community's Outdoor Homeless Strategy.

In the event of a possible encampment closure, a proposal from the CE Lead, approved by the Prioritization Encampment Assessment Team, with justification for temporary priority, shall be presented. The CE Oversight Committee will convene as soon as possible to assess the situation. Based on the urgency and needs of those affected, the Committee may approve temporary adjustments to prioritization protocols. All decisions will center the safety of impacted individuals, while also considering limited resources and broader community priorities outlined in this document, and will remain aligned with person-centered and trauma-informed best practices. Nothing in this policy is designed to prevent the Metro Office of Homeless Services from encampment closures that do not make use of CE resources.