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Commissioner

STATE OF CONNECTICUT  
Department of Housing  
Department of Mental Health & Addiction Services



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August 28, 2017

To: Coordinated Access Networks

From: Steve DiLella, Director of Individual & Family Support Unit, DOH  
Alice Minervino, Behavioral Health Program Manager, DMHAS

Re: DMHAS/DOH Guidance on Due Diligence – Refusal of Services Policy

To ensure that we serve all individuals experiencing homelessness identified in the Coordinated Access Networks (CANs), communities must ensure that engagement is an ongoing process. We know that engagement can be particularly challenging for individuals who refuse offers of housing assistance from the CAN. This guidance from the Department of Mental Health and Addiction Services (DMHAS) and the Department of Housing (DOH) is meant to provide CANs with a process that enables them to identify refusers within your CAN and ensure that they continue to be discussed at housing matching meetings and offered housing resources when available.

## REFUSERS

A refuser is defined as an individual experiencing homelessness who is ACTIVE on the By-Name List (BNL) and has declined three different offers of housing assistance from CAN housing providers. After the third offer is declined, the CAN will change the individual's sub-status on the BNL to "Refuses CAN Assistance."

DOH CAN Managers will review the BNL on a regular basis to identify new refusers, and schedule case conference meetings that include a representative from DMHAS, a DOH CAN Manager, and CAN housing providers. The purpose of these case conference meetings will be to plan for housing assistance options that can be offered to the refuser(s) in the future.

## DUE DILIGENCE CONTACT ATTEMPTS FOR REFUSERS

CANs will designate a person/persons to attempt to contact refusers a minimum of once every two weeks. These contact attempts--and their outcomes, if applicable--will be recorded in the HMIS client record of the refuser by the designated person/persons.

**CHRONIC (VERIFIED) REFUSERS** - Attempts will be made to contact Chronic (Verified) refusers for the purpose of offering the person shelter and/or housing assistance.

**REFUSERS WITH ANY OTHER CHRONIC STATUS** - Attempts will be made to contact any other refusers for the purpose of offering the person housing assistance.

Due diligence contacts will be attempted and recorded in HMIS every two weeks for as long as the refuser remains ACTIVE on the BNL as a refuser. Due diligence contact attempts will be suspended when/if the refuser is INACTIVE on the BNL, and will resume when/if the client becomes ACTIVE on the BNL again.

## **REFUSERS AND HOUSING PLACEMENT MEETINGS**

In order to be designated as a refuser, an individual will have risen to the top of the BNL prioritization and refused multiple offers of housing assistance. Refusers—who are known to be vulnerable and in need of housing assistance—are listed on the HMIS BNL and should be discussed at regular CAN Housing Matching/Placement meetings in priority order per CAN matching procedures. The designated person(s) attempting to make due diligence contact with refusers should provide updates about the status and outcome of due diligence contact attempts for all refusers at these meetings.

## **INACTIVE CLIENTS**

Clients on the BNL can be marked as INACTIVE if 1) they have no HMIS enrollment activity in the preceding 90 days. Case notes, program enrollment activity, and emergency shelter priority lists will be reviewed to make this determination OR 2) at least three attempts have been made over the course of the 90 days to contact the client. As a best practice, CANs should consult with outreach teams for individuals known to be outside before identifying someone as INACTIVE on the BNL. If a client is known to be outside, outreach teams or primary provider will make at least three attempts to actively communicate (ex. letter, phone, text, in-person) with the individual. Please be mindful of the individual's preferred method of communication.

Refusers on the BNL who are covered by this due diligence policy can be marked as INACTIVE on the BNL if they have no HMIS enrollment activity in the preceding 90 days AND if none of the bi-weekly contact attempts were successful in communicating with the client for an entire 90 day period. Refusers on the BNL who remain literally homeless and who can be contacted, observed, or communicated with—even if the outcome of any contact attempt is that the client refuses assistance—should not be marked as inactive.

Refusers on the BNL who are covered by this due diligence policy can also be marked as INACTIVE on the BNL if the outcome of a due diligence contact attempt confirms that the refuser is no longer literally homeless, or is no longer living in the state.

## **TRACKING DUE DILIGENCE CONTACT ATTEMPTS IN HMIS**

Instructions for tracking due diligence contact attempts made to refusers in HMIS are attached to this policy. Additional questions about tracking due diligence requests in HMIS and/or requests for access to use the tracking functionality in HMIS should be directed to the Statewide CAN Manager for Data Analysis: Beau Anderson ([beau.anderson@ct.gov](mailto:beau.anderson@ct.gov)).