



STRENGTHENING COORDINATED ENTRY IN CALIFORNIA: A Strategic Framework for State Leadership



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INTRODUCTION

When the U.S. Department of Housing and Urban Development (HUD) mandated the creation of Coordinated Entry (CE) systems in 2009, few could have anticipated how transformative this initiative would be for the entire supportive housing ecosystem, from public agencies to housing providers to people experiencing homelessness.

Communities across California and the nation have demonstrated that well-designed CE systems can improve fairness, strengthen prioritization, and streamline access to supportive housing. At

the same time, the evolution of CE has also revealed significant operational, capacity, and data challenges—especially in regions with large site-based supportive housing portfolios and high levels of homelessness.

Cross-sector coalitions in Los Angeles and the Bay Area have emerged to bring housing providers, Continuum of Care programs (CoCs), service partners, and public agencies together to address these challenges and improve CE system performance, particularly related to referrals in site-based supportive housing. While early efforts appropriately focused on local system design, recent work in both regions has highlighted the limitations of local action alone. With federal guidance increasingly uncertain, communities agree that **the State of California should assume a more proactive role in reinforcing evidence-based practices, ensure stronger coordination with local jurisdictions and CoCs, and support consistent, effective CE implementation statewide.**

This memo outlines the trends that have shaped CE implementation to date, identifies persistent barriers, and presents recommendations for strategic state action. It contextualizes where and how state support can strengthen local efforts, recognizing that state and local partners share the goal of ending homelessness and maximizing all available housing resources, while also remaining mindful of current budget constraints. **From uplifting proven best practices to promoting stronger interagency coordination, enhancing regulatory alignment, and convening stakeholders to solve problems collectively, this memo provides a framework for expanded state action to ensure that every Californian has a place to call home.**



BACKGROUND AND CONTEXT

California does not have enough affordable or supportive housing to meet the needs of its lowest-income and homeless residents. As a result, communities must meter access to these limited resources. Prior to the implementation of CE, the very people most in need of supportive housing were often the least likely to access it. In this decentralized leasing system, most housing providers rented units on a “first-come, first serve” basis that made it challenging for individuals with extreme vulnerabilities to compete. Individuals in greatest need were simultaneously prone to being “screened out” because of bias or suspicions of lacking housing readiness. **CE was intended to address these very real systemic equity challenges by implementing a community-informed, centralized leasing process.** Through CE, the local homelessness response system could assess, prioritize, and connect households to HUD-funded resources using locally-standardized criteria rather than provider discretion.

Standardizing system access and assessment has resulted in important and successful steps toward system equity. However, as communities across California began to create and implement their own CE systems, there were understandable system growing pains, particularly concerning prioritization and matching functions. Continuums of Care (CoC) suddenly assumed new responsibilities for systemwide housing inventory management, including developing prioritization policies, preparing referrals, and coordinating placements across hundreds of site-based and tenant-based supportive housing units. Each of these units carried distinct financing requirements, regulatory obligations, and documentation standards. Standing up and managing these functions—coordinating local stakeholders, standardizing data collection, and actively monitoring performance—required capacity and infrastructure that many CoCs were not initially structured to support. CoCs simply were not equipped with the resources to implement these complex new systems.

These challenges were compounded by the technical complexity of supportive housing development and operations. CoCs generally lacked expertise in the complex mechanics of the real estate development process (e.g., layered public capital financing, construction, asset management, regulatory compliance) that are integral to the technical nuances

of modern-day, site-based supportive housing. CoCs also had limited influence and control over the wide range of public and private stakeholders (public housing authorities, behavioral health systems, housing developers, property managers, etc.) responsible for different aspects of the system and for funding supportive housing. Many funders began conditioning funding on CE system utilization without input from the CoC on system capacity. At the same time, supportive housing developers and operators often felt peripheral to CE system design. They lacked consistent mechanisms for sharing operational insights with system leaders or informing continuous improvement.

Over time, these dynamics and the pervasive, ongoing lack of funding produced unintended consequences that strained system performance. Instead of streamlining placement, CE became one of a range of factors that have contributed to delayed occupancy, extended vacancies, bottlenecks in matching and screening, and strained provider capacity to serve high-acuity residents. Among providers, there has been increasing awareness of CE system complexities paired with frustration over the pace of system change.

These implementation challenges and experiences were the focus of a [national study in 2025 from Harvard’s Government Performance Lab \(GPL\)](#), which drew on surveys and interviews with representatives from more than 120 jurisdictions across 47 states. The study found that most CoCs lack real-time visibility into supportive housing vacancies and rely heavily on manual referral processes that provide limited insight into systemwide performance. Additionally, the study found that complex and inconsistent eligibility, documentation, and application requirements, combined with risk-averse practices driven by compliance concerns, frequently delay or derail housing placements altogether. **These nationally documented challenges mirror the same concerns that communities have identified through local implementation experience in California.**

Fortunately, communities across the state have already begun identifying and addressing these operational pain points because CE systems are so important to the fundamental goal of ending homelessness. Los Angeles and the Bay Area have formed cross-sector initiatives to improve matching accuracy, reduce vacancies, enhance documentation readiness, and streamline coordination across partners. The following sections provide a brief overview of that work to-date.

Genesis and History of Strengthening Coordinated Entry in Los Angeles

The Los Angeles Coordinated Entry System dates back to 2013 and is among the earliest systems in the state. Efforts to analyze lease-up delays and referral challenges began in earnest in 2017, when Enterprise Community Partners brought together supportive housing developers and the Los Angeles CoC Lead Agency (the Los Angeles Homeless Services Authority) to document the life cycle of project-based supportive housing vacancies and propose process improvements. Since then, Enterprise's Southern California office has continued supporting interagency strategic planning to identify bottlenecks in the vacancy to move-in timeline and activate process improvements that have been voiced by the supportive housing development community. During the pandemic, the CoC also established the Los Angeles Housing Central Command (HCC), seeded through initial HUD-funded technical assistance, that unites the various public sector agencies responsible for different aspects of homelessness assistance and system implementation under the common goal of maximizing supportive housing utilization (e.g., no less than 90%).

In June 2022, the Los Angeles Homeless Services Authority (LAHSA) and Enterprise Community Partners launched a PSH Providers Advisory Council to foster a consistent engagement and feedback loop with the supportive housing development community. The group continues to meet four years later, and at present, there are more than 25 nonprofit supportive housing developers and/or public agency partners associated with this collaborative. This group decided initially to focus on strategizing solutions in four key areas: 1) document and match readiness; 2) multiple matching; 3) concentration of high acuity households; and 4) challenging-to-fill units. Subsequently, the Advisory Council landed on five consensus recommendations related to these focal areas.

Informed in part by the Advisory Council, the Los Angeles CoC has made significant progress advancing these consensus recommendations and other adjustments to the rehousing process under a system redesign effort called "CES Reimagined." These refinements include adopting new prioritization criteria for supportive housing placements, allowing batch matching for new building lease-ups, implementing assertive lease-up coordination (referred to as Active System Management), troubleshooting, designing and launching a Universal Housing Application, and



dedicating CoC staff specifically to oversee existing supportive housing inventory. These changes have increased provider confidence, improved system accountability and performance, and established a collaborative model that other communities can learn from and possibly replicate.

Genesis and History of Strengthening Coordinated Entry in the Bay Area

The Non-Profit Housing Association of Northern California (NPH) began hearing growing concerns from nonprofit housing providers about Coordinated Entry (CE) implementation as it expanded across the Bay Area beginning in 2017. In response to these concerns, the NPH Supportive Housing Working Group (SH WG), a group of nonprofit housing practitioners predominantly representing resident services and property management staff, set out to develop practical and strategic recommendations to strengthen CE implementation. To better understand systemic challenges and cross-county variation, the SH WG hosted a nine-month learning series beginning in March 2024, featuring CE representatives and stakeholders across Alameda, Contra Costa, Los Angeles, San Francisco, San Mateo, and Santa Clara counties.

Building on these presentations and members' direct leasing experiences, the SH WG developed an initial set of best-practice recommendations, which were refined through a survey of 28 NPH members representing housing operators, service providers, and local government. With these consensus recommendations in place, the group broadened its outreach statewide, conducting more than 15 presentations with service providers, CoC staff, and other partners to surface additional best-practice ideas with strong stakeholder support. These efforts culminated in the release of NPH's [*Coordinated Entry Systems: Best Practices Recommendations*](#) brief in early 2026.

Today, the NPH SH WG continues to collaborate with counties across the region on implementing identified best practices to strengthen CE system performance.

IDENTIFYING THE NEED FOR STATE LEADERSHIP

In August 2025, the conveners of Los Angeles's HCC PSH Advisory Council and the Bay Area's NPH Supportive Housing Working Group came together to identify common themes emerging from their respective regional efforts. Both groups had seen meaningful improvements when housing providers and CoC staff partnered more closely to strengthen CE operations, yet also recognized that many of the system challenges they were confronting—documentation barriers, regulatory constraints, and limited data infrastructure—extended well beyond local control. Indeed, while federal and local entities hold primary policymaking authority, lasting improvements to CE will require a greater and more intentional role from the State of California.

The state is already a central partner in the creation and long-term viability of supportive housing, funding both capital development and supportive services, and requiring use of CE for many state-assisted units. However, the state does not have positional authority over CE systems: that responsibility lies solely with the federal government. **With the federal government now proposing significant shifts that could destabilize the CoC model and exacerbate homelessness, this moment demands system recalibration.** Contemporaneous efforts to strengthen state homelessness response infrastructure through the creation of the California Housing and Homelessness Agency make this the opportune moment for the state to refine its approach and involvement with CE. State leadership is essential to provide evidence-based guidance, remove regulatory barriers, and ensure continuity of practice.

Grounded in their shared experiences, housing and service providers across the state have aligned on five top-level recommendations for how the state can strengthen CE implementation statewide:

RECOMMENDATION #1

Uplift Coordinated Entry best practices proven successful in multiple high-performing Continuums of Care to encourage communities to adopt standardized practices

As the LA PSH Advisory Council and NPH Supportive Housing Workgroup demonstrate, communities have made measurable progress in improving CE outcomes by standardizing core operational practices, strengthening cross-agency coordination, and building shared ownership over system performance. Establishing statewide guidance that lifts up proven practices can help reduce unnecessary variation, make expectations clearer for both CoCs and housing operators, and ultimately shorten the path from vacancy to move-in. By encouraging a common operational baseline while still allowing room for local flexibility, the state can ensure that communities are not reinventing processes in isolation and instead are benefiting from the lessons learned in high-performing jurisdictions. **We recommend that the state issue guidance on CE best practices, uplifting successful policies from communities across the state.**

! Four Critical Implementation Actions

There are **four critical implementation actions** that we believe should be **near-term priorities** of the state to strengthen local pathways into supportive housing:

ACTION 1 Provide guidance and best practice examples to Continuums of Care to reduce unnecessary variation in local regulations and uplift successful strategies to address shared challenges, including around data reporting and transparency

RECOMMENDATIONS
#1, #5A, #5B

ACTION 2 Convene a regular working group of staff from the state housing finance agencies (e.g., TCAC, HDFC, etc.), local CoC/CE lead agency staff, and housing providers to build relationships, trouble-shoot shared problems, and provide input on future state action

RECOMMENDATIONS
#2B, #3A, #4A, #4C

ACTION 3 Revise capital funding guidelines and compliance standards to expand flexibility for both housing applicants and developers, such as through removing documentation requirements, expanding unnecessarily restrictive population definitions, and adopting opportunities for targeting relief

RECOMMENDATIONS
#2C, #3D, #3E

ACTION 4 Review existing performance metrics associated with housing and homelessness programs to identify opportunities to further standardize data collection and unify key performance indicators

RECOMMENDATIONS
#5C

Specifically, there is alignment on the following local best practices being uplifted from Los Angeles and the Bay Area:

- Use a centralized online vacancy notification and inventory tracking system
- Resource a dedicated team responsible for document readiness and completing housing applications
- Provide multiple referrals for one housing resource opening
- Use a single Universal Housing Application for all properties that clearly communicates required documents and information
- Participate in pipeline and vacancy management, and COCs should serve as lead coordinator during the lease-up process both for new construction and at turnover
- Create a dedicated feedback loop with the supportive housing development community, so that providers and CE administrators can learn about shared matching and leasing challenges, keep each other informed of portfolio trends and system redesign efforts, and work collectively to identify and activate system-level rehousing improvements
- Explicitly name “levels” of services that are expected to be offered in the available supportive housing unit. Some jurisdictions may then choose to match participants based on household need, although we did not see consensus on this practice across jurisdictions and also acknowledge the increased capacity that would be needed to effectively implement this practice.

As funding permits, the state can further support provider capacity by offering technical assistance on best practices by region.

RECOMMENDATION #2

Leverage state resources and policymaking to support communities to prepare supportive housing referrals with appropriate eligibility verifications for housing placement

One of the greatest rehousing barriers and causes for leasing delays is the lack of proper client-level eligibility documentation (e.g., ID, disability, homelessness status, income, etc.) that is instrumental for both applicant screening and compliance with financing regulations. It can be hard for CES to stay in contact with individuals experiencing unsheltered homelessness while they wait for housing opportunities to become available. By the time a referral is issued, housing navigators are frequently left trying to locate individuals, re-establish trust, and re-prepare documentation that may have been lost during the interim period. In some counties with fewer resources, these responsibilities are shifted to housing providers, effectively requiring property managers to take on housing navigation and outreach functions in addition to property operations and supportive housing responsibilities.

By reducing barriers to access housing, the state would enable counties to better prioritize resources for the critical tasks of sustaining engagement and providing navigation support. In particular, as more regions consider or begin to shift to “document-ready matching,” either as a priority or prerequisite for supportive housing placement, the state can support in the following ways:

A. Support clients in obtaining key documents necessary for housing move-in, such as personal identification. One example of this would be providing tailored and expedited services for homeless individuals through the California DMV.

B. Ensure consistent, minimal ID and income verification standards and clearly define those verification standards for housing providers

**ACTION
2**

C. Expedite referrals to supportive housing by removing housing history and landlord references as a condition of tenancy for non-federally funded affordable housing units receiving referrals through CES

**ACTION
3**

D. Allow presumptive eligibility for income verification if a supportive housing tenant has qualified for SNAP, TANF, or Medi-Cal benefits

RECOMMENDATION #3**Mitigate or remove regulatory constraints that can limit supportive housing referral eligibility and availability**

Regulatory requirements, underwriting assumptions, and population targeting decisions made during the predevelopment phase can impact project viability once those developments shift into lease-up and operations years later. Complex and layered requirements can create prolonged vacancies and increased referral attrition as communities struggle to find a pool of qualifying households. **Ensuring that supportive housing developments are designed and financed in ways that align with local needs is therefore critical to both ending homelessness and supporting long-term development viability.** Indeed, [recent underwriting guidance](#) from the Affordable Housing Investors Council underscores that flexibility to evolve population targeting is critical to assessing supportive housing viability. There is also a precedent for the state providing narrow, targeted relief through AB 1386, which allows providers to disregard veterans' disability income to assist with filling extremely-low-income veteran supportive housing units. Similar precedent is also included in the federal bipartisan congressional passage of the 21st Century ROAD to Housing Act.

The lack of flexibility on the regulatory level reflects a broader tension. Local CoCs and matchers express frustration that supportive housing developers are not creating the types of housing that are the best fit for those experiencing homelessness in their communities. At the same time, supportive housing developers describe how competitive and challenging it can be to secure any public financing for their development if they do not commit to deep affordability and multiple population targeting. Such a dynamic presents a no-win situation for local communities.

The state can facilitate the following solutions:**ACTION 2**

- A.** Regularly convene CoCs and supportive housing developers from across the state to review trends in populations seeking supportive housing; identify and discuss project typologies and unit criteria that create referral and utilization challenges; and peer review ideas for matching applicants to available supportive housing

- B.** Conduct or sponsor research on challenging-to-fill units to further assess and document “unicorn unit” characteristics, where the specific overlap between multiple population targets on the same unit has proven challenging for leasing
- C.** Encourage collaboration between supportive housing applicants of state capital funding and the local/applicable CoC to promote project design and targeting that is compatible with local population needs, both during initial project design phases when unit mixes can be changed and prior to lease-up, to identify potentially problematic units to fill
- D.** Review capital funding application guidelines to assess where there may be regulatory constraints within state capital programs that could be mitigated to increase the marketability/viability of state-assisted supportive housing
- E.** Adopt “population targeting relief” language in regulatory agreements to provide options for developers if they are unsuccessful in marketing the property to the intended population, similar in scope to the reforms under AB 1386 and the Federal Road to Housing Act

ACTION 3**ACTION 3****RECOMMENDATION #4****Provide compliance coordination with local governments and CoCs as they pursue and implement system-level process improvements**

As localities implement refinements to reduce housing barriers and maximize supportive housing utilization, they are likely to require engagement and guidance from the state to ensure compliance with state housing finance requirements. Local CoC representatives often lack expertise in real estate development, supportive housing financing, and the complex compliance landscape associated with site-based supportive housing development and asset management. They also have limited established relationships with state housing finance and behavioral health staff, making it difficult to anticipate how state regulations may interact (and potentially conflict) with locally driven process improvements.

These gaps can delay or complicate well-intentioned reforms. The supportive housing development community is unlikely to implement any process changes that appear inconsistent with state regulations. In the case of Los Angeles, the adoption of the Universal Housing Application and the federal (HUD) waiver to allow applicants to self-certify certain eligibility verifications represents an approach that originated with localities but could have benefitted from initial state compliance review. Both tools ultimately resulted in the need for additional guidance to be issued by state housing finance partners (including HCD and TCAC), a process that was time-consuming and lacked clarity as to which state-level staff should be approached. At least initially, these factors mitigated the full utilization of these new tools by supportive housing owners and property managers.

For these reasons, localities need opportunities to engage state compliance representatives before progressing with local improvement efforts. Stronger relationships and coordination between the state and localities will make these improvement efforts more efficient and viable but, importantly, will also help to avoid posing any undue compliance risks for supportive housing developers.

Suggestions to foster greater interagency alignment and coordination include:

**ACTION
2**

A. Convene compliance leads from state housing finance and healthcare agencies (e.g., TCAC, HCD, CHHA, DHCS, CDSS, etc.) and local CoC/CE lead agency staff to facilitate introductions and relationship building

B. Encourage CoCs to work with the development community to inventory previous and current compliance conflicts that warranted state guidance or need attention and package and present those findings to compliance leads to support education on the types of scenarios and technical guidance that could benefit localities

**ACTION
2**

C. Foster periodic exchange with local CE leads and state compliance staff to ensure both parties are aware of current or planned process improvement efforts that may require state-level guidance and/or troubleshooting

D. Equip state-level compliance leads to prepare and issue guidance when local CE process improvement initiatives need clarification in light of current state housing finance guidelines

RECOMMENDATION #5

Support enhancement of local data quality by providing technical assistance, sharing best practices examples, and streamlining reporting requirements

As nationally documented through the recent [Government Performance Lab Report](#), communities continue to lack capacity and infrastructure to track critical system performance data. Fragmented data responsibilities across CoCs, PHAs, counties, behavioral health agencies, and other partners often lead to duplicative reporting, inconsistent information, and outdated referral or vacancy data. Based on the level of resources available, local CoC resource management systems are not sophisticated enough to track all the layers of eligibility and characteristics of supportive housing units. At the same time, most housing providers track vacancies in their own systems, which are rarely integrated with CE-wide platforms, further limiting visibility into real-time housing inventory.

Local jurisdictions are eager to develop more advanced, automated, and integrated data systems that provide a clearer picture of utilization, bottlenecks, and referral timelines. Specific data points of interest for system performance include timelines for property managers to report a vacancy, for a unit to be reported as ready for move-in, for CES to refer an individual, and for an individual to obtain documentation readiness. The state can play a key role by offering technical assistance, sharing best-practices examples, and highlighting promising public-facing dashboards that improve transparency and system accountability.

The state should also review existing performance metrics of their housing and homelessness programs to determine if there are opportunities for greater standardization and alignment across reporting frameworks. State housing and homelessness programs regularly require housing providers to report tenant-level or property-level outcomes as part of annual compliance. In some communities, these reporting requirements have been operationalized by integrating the needed data fields directly into HMIS and assigning responsibility for data entry to the staff who work with clients during referral or lease-up. Housing providers then request aggregated reports from the local CE or HMIS administrator to meet state reporting requirements.

The state could more proactively promote this type of integrated data collection approach across counties by clearly identifying which outcome measures or documentation requirements can be built into local HMIS workflows. Additionally, the state could streamline compliance by receiving a wider variety of standardized reports directly from counties or HMIS leads—rather than relying on individual housing providers to act as intermediaries—thus reducing administrative burden and improving data quality and consistency statewide.

The state can implement the following strategies to support local data improvement:

**ACTION
1**

A. Provide guidance and best practices examples of automated and integrated data systems that local systems have used to achieve a better understanding of current utilization, referral processing, and timeline data

**ACTION
1**

B. Showcase promising examples of public-facing dashboards that illuminate a fuller picture of system throughput and utilization

**ACTION
4**

C. Review existing performance metrics of housing and homelessness programs to identify opportunities to further standardize data collection and unify key performance indicators

D. Revise HHAP priorities to make it easier for CoCs to use HHAP dollars to fund resource management system improvements that can speed up the matching and referral process for supportive homes

CONCLUSION

The state has an opportunity—and a responsibility—to strengthen its partnership with local homelessness response systems, reduce administrative barriers, and promote practices that accelerate housing placements and improve long-term property sustainability. The recommendations outlined in this memo reflect the shared experiences of CoCs, housing providers, service providers, and regional stakeholders who are deeply invested in making CE work better for the communities it serves. The state can play a catalytic role in helping local systems house more Californians more quickly. Ultimately, these actions will not only improve CE operations, but also strengthen the broader system of supportive housing that is essential to ending homelessness statewide.

