### **Before Starting the CoC Application**

The CoC Consolidated Application is made up of two parts: the CoC Application and the CoC Priority Listing, with all of the CoC's project applications either approved and ranked, or rejected. The Collaborative Applicant is responsible for submitting both the CoC Application and the CoC Priority Listing in order for the CoC Consolidated Application to be considered complete.

The Collaborative Applicant is responsible for:

1. Reviewing the FY 2017 CoC Program Competition NOFA in its entirety for specific application and program requirements.

2. Ensuring all questions are answered completely.

3. Reviewing the FY 2017 CoC Consolidated Application Detailed Instructions, which gives additional information for each question.

4. Ensuring all imported responses in the application are fully reviewed and updated as needed.

5. The Collaborative Applicant must review and utilize responses provided by project applicants in their Project Applications.

6. Some questions require the Collaborative Applicant to attach documentation to receive credit for the question. This will be identified in the question.

- Note: For some questions, HUD has provided documents to assist Collaborative Applicants in filling out responses. These are noted in the application.

- All questions marked with an asterisk (\*) are mandatory and must be completed in order to submit the CoC Application.

For CoC Application Detailed Instructions click here.

# 1A. Continuum of Care (CoC) Identification

#### Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1A-1. CoC Name and Number: CA-614 - San Luis Obispo County CoC

**1A-2. Collaborative Applicant Name:** County of San Luis Obispo

1A-3. CoC Designation: CA

1A-4. HMIS Lead: County of San Luis Obispo

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## **1B. Continuum of Care (CoC) Engagement**

#### Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1B-1. From the list below, select those organization(s) and/or person(s) that participate in CoC meetings. Using the drop-down boxes, indicate if the organization(s) and/or person(s): (1) participate in CoC meetings; and (2) vote, including selection of CoC Board members. Responses should be for the period from 5/1/16 to 4/30/17.

Organization/Person Categories	Participates in CoC Meetings	Votes, including electing CoC Board Members
Local Government Staff/Officials	Yes	Yes
CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes
Law Enforcement	Yes	Yes
Local Jail(s)	Yes	No
Hospital(s)	Yes	Yes
EMT/Crisis Response Team(s)	Yes	No
Mental Health Service Organizations	Yes	Yes
Substance Abuse Service Organizations	Yes	Yes
Affordable Housing Developer(s)	Yes	Yes
Disability Service Organizations	Yes	No
Disability Advocates	Yes	No
Public Housing Authorities	Yes	Yes
CoC Funded Youth Homeless Organizations	Not Applicable	No
Non-CoC Funded Youth Homeless Organizations	No	No
Youth Advocates	Yes	Yes
School Administrators/Homeless Liaisons	Yes	Yes
CoC Funded Victim Service Providers	Yes	No
Non-CoC Funded Victim Service Providers	Yes	No
Domestic Violence Advocates	Yes	Yes
Street Outreach Team(s)	Yes	Yes
Lesbian, Gay, Bisexual, Transgender (LGBT) Advocates	Yes	No
LGBT Service Organizations	Not Applicable	No
Agencies that serve survivors of human trafficking	Yes	Yes
Other homeless subpopulation advocates	Yes	No
Homeless or Formerly Homeless Persons	Yes	No
Other:(limit 50 characters)		

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Applicant must select Yes, No or Not Applicable for all of the listed organization/person categories in 1B-1.

# 1B-1a. Describe the specific strategy(s) the CoC uses to solicit and consider opinions from organizations and/or persons that have an interest in preventing or ending homelessness. (limit 1000 characters)

The CoC full and committee meetings are open to the public and are announced through their website and email listserv for any organization or persons with interest in preventing/ending homelessness to attend. CoC Board members regularly reach out to liaison organizations and individuals to collaborate and present information and recommendations during committee discussions. In the past year, the Housing Committee regularly solicited the advice of a legislative aide and housing trust fund to interpret legislation that would affect housing opportunities. With their guidance, the Housing Committee drafted recommendations to the Board of Supervisors for initiatives to increase opportunities for building housing for very low income households.

# 1B-2. Describe the CoC's open invitation process for soliciting new members, including any special outreach. (limit 1000 characters)

The CoC's meetings are open to the public and the open invitation process solicits new members and interested parties via email listserv and committee announcements to join the board annually. Members that have concluded their term have named potential successors to the board. Special outreach is conducted to engage underrepresented categories within the CoC governing board.

1B-3. Describe how the CoC notified the public that it will accept and consider proposals from organizations that have not previously received CoC Program funding in the FY 2017 CoC Program Competition, even if the CoC is not applying for new projects in FY 2017. The response must include the date(s) the CoC made publicly knowing they were open to proposals.

#### (limit 1000 characters)

The CoC notified the public through social media (Facebook), public posted via webpage on both the CoC and county government main page, and email blast that the CoC is considering proposals for the permanent housing bonus project in FY2017. The CoC made publicly posted this information on July 25, 2017.

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## 1C. Continuum of Care (CoC) Coordination

#### Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

#### 1C-1. Using the chart below, identify the Federal, State, Local, Private and Other organizations that serve homeless individuals, families, unaccompanied youth, persons who are fleeing domestic violence, or those at risk of homelessness that are included in the CoCs coordination; planning and operation of projects.

Only select "Not Applicable" if the funding source(s) do not exist in the CoC's geographic area.

Entities or Organizations the CoC coordinates planning and operation of projects	Coordinates with Planning and Operation of Projects
Housing Opportunities for Persons with AIDS (HOPWA)	No
Temporary Assistance for Needy Families (TANF)	Yes
Runaway and Homeless Youth (RHY)	Not Applicable
Head Start Program	Yes
Housing and service programs funded through Department of Justice (DOJ) resources	Yes
Housing and service programs funded through Health and Human Services (HHS) resources	Yes
Housing and service programs funded through other Federal resources	Yes
Housing and service programs funded through state government resources	Yes
Housing and service programs funded through local government resources	Yes
Housing and service programs funded through private entities, including foundations	Yes
Other:(limit 50 characters)	

1C-2. Describe how the CoC actively consults with Emergency Solutions Grant (ESG) recipient's in the planning and allocation of ESG funds. Include in the response: (1) the interactions that occur between the CoC and the ESG Recipients in the planning and allocation of funds; (2) the CoCs participation in the local Consolidated Plan jurisdiction(s) process by providing Point-in-Time (PIT) and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions; and (3) how the CoC ensures local homelessness information is clearly communicated and addressed in Consolidated Plan updates. (limit 1000 characters)

The ESG recipient regularly participates CoC meetings. The CoC has a prevailing role in evaluating outcomes for ESG funded activities: determining how to allocate ESG funds for eligible activities, developing performance

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standards ESG-assisted activities, and developing funding policies and procedures for the operation and administration of HMIS for ESG funded projects. The CoC board reviews and recommends which ESG programs should be awarded funds. The CoC provides PIT/HIC data sorted by region and cities within the Consolidated Plan to assist local decision makers to determine where ESG resources would be most efficacious within the CoC jurisdiction. The CoC committee meetings are regularly attended by Con Plan staff, who receives information regarding local homelessness priorities from the CoC. During the update process, the County staff incorporates the needs and data and seeks review from the CoC.

#### 1C-3. CoCs must demonstrate the local efforts to address the unique needs of persons, and their families, fleeing domestic violence that includes access to housing and services that prioritizes safety and confidentiality of program participants. (limit 1000 characters)

Persons fleeing domestic violence may enter services either through the CoC's Coordinated Entry (CE) sites for COC funded programs or through Entry sites for DV specific programs. Subrecipient staff conduct a danger or risk assessment for any individual who presents as fleeing domestic violence. Those who enter through the CoC's sites are given the choice of shelter and services from the Coordinated Entry site or referral to DV specific shelter and housing programs.Consideration is given to where the client would feel the most safe.If the referral to domestic violence agencies results in the household not being referred to a domestic violence shelter, the Coordinated Assessment System or receiving agency will proceed with the standard methods of assessment and prioritization and the victimization experience will be considered in the assessment and service needs evaluation; however, the client's identify will be masked and remain anonymous unless otherwise indicated by the client.

1C-3a. CoCs must describe the following: (1) how regular training is provided to CoC providers and operators of coordinated entry processes that addresses best practices in serving survivors of domestic violence; (2) how the CoC uses statistics and other available data about domestic violence, including aggregate data from comparable databases, as appropriate, to assess the scope of community needs related to domestic violence and homelessness; and (3) the CoC safety and planning protocols and how they are included in the coordinated assessment. (limit 1,000 characters)

The CoC offers quarterly training on providing services using a Trauma Informed lens. The CoC also held a trauma informed care conference. The County and its partners are developing a "Trauma Toolbox" for case managers. While not specific to homeless services, it will be applicable for CES staff working with DV survivors.

The CoC accesses information from the PIT Count, from the VI-SPDAT surveys, and from the comparable databases to assess the scope of community needs. Information is used for planning and for making funding decisions for

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the County's General Fund assistance for homeless programs.

Safety and planning protocols require CoC Coordinated Entry agencies to consult with Domestic Violence agencies and the clients when placing and serving clients. Clients are given the choice of a DV agency or a homeless service agency. Non-DV specific agencies will consider clients' safety needs when planning services, and the client's identify will be masked in files.

1C-4. Using the chart provided, for each of the Public Housing Agency's (PHA) in the CoC's geographic area: (1) identify the percentage of new admissions to the Public Housing or Housing Choice Voucher (HCV) Programs in the PHA's that were homeless at the time of admission; and (2) indicate whether the PHA has a homeless admission preference in its Public Housing and/or HCV program.

Attachment Required: If the CoC selected, "Yes-Public Housing", "Yes-HCV" or "Yes-Both", attach an excerpt from the PHA(s) written policies or a letter from the PHA(s) that addresses homeless preference.

Public Housing Agency Name	% New Admissions into Public Housing and Housing Choice Voucher Program during FY 2016 who were homeless at entry	PHA has General or Limited Homeless Preference
Housing Authority of San Luis Obispo	63.00%	Yes-HCV

If you select "Yes--Public Housing," "Yes--HCV," or "Yes--Both" for "PHA has general or limited homeless preference," you must attach documentation of the preference from the PHA in order to receive credit.

1C-4a. For each PHA where there is not a homeless admission preference in their written policies, identify the steps the CoC has taken to encourage the PHA to adopt such a policy. (limit 1000 characters)

Not applicable; Housing Authority of San Luis Obispo (HASLO) PHA already has a homeless admission preference documented in their written policies.

1C-5. Describe the actions the CoC has taken to: (1) address the needs of Lesbian, Gay, Bisexual, Transgender (LGBT) individuals and their families experiencing homelessness, (2) conduct regular CoC-wide training with providers on how to effecctively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Idenity, including Gender Identify Equal Access to Housing, Fina Rule; and (3) implementation of an anti-discrimination policy. (limit 1000 characters)

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The COC has a nondiscrimination policy based on the 2012 and 2016 Equal Access Rule and Final Rule. CoC staff disseminated copies of the HUD policy to CoC and ESG subrecipients in the Fall of 2016. A training was held in January 2017 for subrecipient agency staff on working with LGBTQ individuals and families, with an emphasis on working with transgendered persons. The CoC is planning to hold annual trainings.

# 1C-6. Criminalization: Select the specific strategies implemented by the CoC to prevent the criminalization of homelessness in the CoC's geographic area. Select all that apply.

Engaged/educated local policymakers:	x
Engaged/educated law enforcement:	X
Engaged/educated local business leaders	X
Implemented communitywide plans:	x
No strategies have been implemented	
Other:(limit 50 characters)	

# When "No Strategies have been implemented" is selected no other checkbox may be selected.

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# 1D. Continuum of Care (CoC) Discharge Planning

#### Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1D-1. Discharge Planning-State and Local: Select from the list provided, the systems of care the CoC coordinates with and assists in state and local discharge planning efforts to ensure those who are discharged from that system of care are not released directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply.

Foster Care:	X
Health Care:	X
Mental Health Care:	X
Correctional Facilities:	X
None:	

1D-1a. If the applicant did not check all the boxes in 1D-1, provide: (1) an explanation of the reason(s) the CoC does not have a discharge policy in place for the system of care; and (2) provide the actions the CoC is taking or plans to take to coordinate with or assist the State and local discharge planning efforts to ensure persons are not discharged to the street, emergency shelters, or other homeless assistance programs. (limit 1000 characters)

1D-2. Discharge Planning: Select the system(s) of care within the CoC's geographic area the CoC actively coordinates with to ensure persons who have resided in any of the institutions listed below longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply.

Foster Care:	x
Health Care:	X

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Mental Health Care:	X
Correctional Facilities:	x
None:	

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### 1E. Continuum of Care (CoC) Project Review, Ranking, and Selection

#### Instructions

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1E-1. Using the drop-down menu, select the appropriate response(s) that demonstrate the process the CoC used to rank and select project applications in the FY 2017 CoC Program Competition which included (1) the use of objective criteria; (2) at least one factor related to achieving positive housing outcomes; and (3) included a specific method for evaluating projects submitted by victim service providers.

# Attachment Required: Public posting of documentation that supports the process the CoC used to rank and select project application.

Used Objective Criteria for Review, Rating, Ranking and Section	Yes
Included at least one factor related to achieving positive housing outcomes	Yes
Included a specific method for evaluating projects submitted by victim service providers	Yes

#### 1E-2. Severity of Needs and Vulnerabilities

CoCs must provide the extent the CoC considered the severity of needs and vulnerabilities experienced by program participants in their project ranking and selection process. Describe: (1) the specific vulnerabilities the CoC considered; and (2) how the CoC takes these vulnerabilities into account during the ranking and selection process. (See the CoC Application Detailed Instructions for examples of severity of needs and vulnerabilities.)

#### (limit 1000 characters)

The CoC grant review committee took into consideration the following specific vulnerabilities in considering the applications: chronic homelessness, low to no income, current or past substance abuse, and criminal histories. The CoC took these vulnerabilities into account and rated a project more highly if the project demonstrated within the narrative of the project scope and in the applicant's prior history and experience that the project was aimed specifically for these vulnerabilities. The CoC adheres firmly to the Housing First philosophy and requires any CoC project to follow the same.

#### 1E-3. Using the following checklist, select: (1) how the CoC made publicly

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available to potential project applicants an objective ranking and selection process that was used for all project (new and renewal) at least 2 days before the application submission deadline; and (2) all parts of the CoC Consolidated Application, the CoC Application attachments, Priority Listing that includes the reallocation forms and Project Listings that show all project applications submitted to the CoC were either accepted and ranked, or rejected and were made publicly available to project applicants, community members and key stakeholders.

Attachment Required: Documentation demonstrating the objective ranking and selections process and the final version of the completed CoC Consolidated Application, including the CoC Application with attachments, Priority Listing with reallocation forms and all project applications that were accepted and ranked, or rejected (new and renewal) was made publicly available. Attachments must clearly show the date the documents were publicly posted.

Public Posting	
CoC or other Website	X
Email	X
Mail	X
Advertising in Local Newspaper(s)	
Advertising on Radio or Television	
Social Media (Twitter, Facebook, etc.)	x

1E-4. Reallocation: Applicants must demonstrate the ability to reallocate lower performing projects to create new, higher performing projects. CoC's may choose from one of the following two options below to answer this question. You do not need to provide an answer for both.

Option 1: The CoC actively encourages new and existing providers to apply for new projects through reallocation.

Attachment Required - Option 1: Documentation that shows the CoC actively encouraged new and existing providers to apply for new projects through reallocation.

Option 2: The CoC has cumulatively reallocated at least 20 percent of the CoC's ARD between FY 2013 and FY 2017 CoC Program Competitions. No Attachment Required - HUD will calculate the cumulative amount based on the CoCs reallocation forms submitted with each fiscal years Priority Listing.

#### Reallocation: Option 1

Attachment Required - provide documentation that shows the CoC actively encouraged new and existing providers to apply for new projects through reallocation.

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1E-5. If the CoC rejected or reduced project 09/20/2017 application(s), enter the date the CoC and Collaborative Applicant notified project applicants their project application(s) were being rejected or reduced in writing outside of e-snaps.

Attachment Required: Copies of the written notification to project applicant(s) that their project application(s) were rejected. Where a project application is being rejected or reduced, the CoC must indicate the reason(s) for the rejection or reduction.

1E-5a. Provide the date the CoC notified 09/20/2017 applicant(s) their application(s) were accepted and ranked on the Priority Listing, in writing, outside of e-snaps.

Attachment Required: Copies of the written notification to project applicant(s) their project application(s) were accepted and ranked on the Priority listing.

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# **Reallocation Supporting Documentation**

#### Attachment Required - provide documentation that shows the CoC actively encouraged new and existing providers to apply for new projects through reallocation.

Document Type	Required?	Document Description	Date Attached
Reallocation Supporting Documentation	No	Reallocation Supp	09/26/2017

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# **Attachment Details**

**Document Description:** Reallocation Supporting Document

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#### 2A. Homeless Management Information System (HMIS) Implementation

#### Intructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2A-1. Does the CoC have in place a Governance Charter or other written documentation (e.g., MOU/MOA) that outlines the roles and responsibilities of the CoC and HMIS Lead?	Yes
Attachment Required: If "Yes" is selected, a copy of the sections of the Governance Charter, or MOU/MOA addressing the roles and responsibilities of the CoC and HMIS	

Lead.

- 2A-1a. Provide the page number(s) where the 21 roles and responsibilities of the CoC and HMIS Lead can be found in the attached document(s) referenced in 2A-1. In addition, indicate if the page number applies to the Governance Charter or MOU/MOA.
- 2A-2. Does the CoC have a HMIS Policies and Yes Procedures Manual? Attachment Required: If the response was "Yes", attach a copy of the HMIS Policies and Procedures Manual.
- 2A-3. What is the name of the HMIS software BellData vendor?
- 2A-4. Using the drop-down boxes, select the Single CoC HMIS implementation Coverage area.

2A-5. Per the 2017 HIC use the following chart to indicate the number of beds in the 2017 HIC and in HMIS for each project type within the CoC. If a particular project type does not exist in the CoC then enter "0" for all cells

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#### in that project type.

Project Type	Total Beds in 2017 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ESG) beds	280	45	203	86.38%
Safe Haven (SH) beds	0	0	0	
Transitional Housing (TH) beds	72	48	24	100.00%
Rapid Re-Housing (RRH) beds	43	0	43	100.00%
Permanent Supportive Housing (PSH) beds	251	0	86	34.26%
Other Permanent Housing (OPH) beds	6	0	6	100.00%

2A-5a. To receive partial credit, if the bed coverage rate is below 85 percent for any of the project types, the CoC must provide clear steps on how it intends to increase this percentage for each project type over the next 12 months. (limit 1000 characters)

The beds in PSH that are not otherwise covered by HMIS are HUD-VASH beds.

2A-6. Annual Housing Assessment Report 12 (AHAR) Submission: How many Annual Housing Assessment Report (AHAR) tables were accepted and used in the 2016 AHAR?

2A-7. Enter the date the CoC submitted the 05/02/2017 2017 Housing Inventory Count (HIC) data into the Homelessness Data Exchange (HDX). (mm/dd/yyyy)

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# 2B. Continuum of Care (CoC) Point-in-Time Count

#### Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2B-1. Indicate the date of the CoC's 2017 PIT 01/28/2017 count (mm/dd/yyyy). If the PIT count was conducted outside the last 10 days of January 2017, HUD will verify the CoC received a HUD-approved exception.

#### 2B-2. Enter the date the CoC submitted the 05/02/2017 PIT count data in HDX. (mm/dd/yyyy)

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### 2C. Continuum of Care (CoC) Point-in-Time (PIT) Count: Methodologies

#### Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

#### 2C-1. Describe any change in the CoC's sheltered PIT count implementation, including methodology and data quality changes from 2016 to 2017. Specifically, how those changes impacted the CoCs sheltered PIT count results. (limit 1000 characters)

There were no changes to the methodology or implementation of the sheltered count.

2C-2. Did your CoC change its provider Yes coverage in the 2017 sheltered count?

# 2C-2a. If "Yes" was selected in 2C-2, enter the change in provider coverage in the 2017 sheltered PIT count, including the number of beds added or removed due to the change.

Beds Added:	0
Beds Removed:	20
Total:	-20

2C-3. Did your CoC add or remove emergency No shelter, transitional housing, or Safe-Haven inventory because of funding specific to a Presidentially declared disaster resulting in a change to the CoC's 2017 sheltered PIT count?

# 2C-3a. If "Yes" was selected in 2C-3, enter the number of beds that were added or removed in 2017 because of a Presidentially declared disaster.

Beds Added:	0
Beds Removed:	0
Total:	0

# **2C-4. Did the CoC change its unsheltered PIT** Yes count implementation, including

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methodology and data quality changes from 2016 to 2017? CoCs that did not conduct an unsheltered count in 2016 or did not report unsheltered PIT count data to HUD in 2016 should compare their efforts in 2017 to their efforts in 2015.

#### 2C-4a. Describe any change in the CoC's unsheltered PIT count implementation, including methodology and data quality changes from 2016 to 2017. Specify how those changes impacted the CoC's unsheltered PIT count results. See Detailed Instructions for more information. (limit 1000 characters)

The CoC followed the methodology of the 2015 unsheltered count for the 2017 unsheltered count. The CoC improved data quality in 2017 by convening focus groups of homeless persons prior to the count to gather hot spot information that helped with planning the vehicle count.

# 2C-5. Did the CoC implement specific Yes measures to identify youth in their PIT count?

2C-5a. If "Yes" was selected in 2C-5, describe the specific measures the CoC; (1) took to identify homeless youth in the PIT count; (2) during the planning process, how stakeholders that serve homeless youth were engaged; (3) how homeless youth were engaged/involved; and (4) how the CoC worked with stakeholders to select locations where homeless youth are most likely to be identified. (limit 1000 characters)

Planning for the 2017 supplemental youth count included many youth homeless service providers. Local providers worked with the contractor's staff to conduct focus groups to identify "hot spot" locations where homeless youth were known to congregate. Service providers throughout the county were asked to recruit currently homeless youth to participate in the count. Youth workers were paid \$15 per hour for their time, including the training conducted prior to the count. Youth were trained on where and how to identify homeless youth as well as how to record the data. On the day of the count, these enumerators fanned out across the county, with a special emphasis on "hot spot" locations.

# 2C-6. Describe any actions the CoC implemented in its 2017 PIT count to better count individuals and families experiencing chronic homelessness, families with children, and Veterans experiencing homelessness. (limit 1000 characters)

In the months leading up to the Count, the CoC met with VA and Supportive Services for Veteran Families staff to discuss methods for reaching homeless veterans. Staff were involved in planning for the count and also helped to recruit currently and formerly homeless veterans to act as guides for the count. Outreach was also conducted to veterans services organizations and other agencies that serve homeless veterans.

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The CoC also consulted with agencies that serve chronically homeless persons and CoC agencies recruited chronically homeless persons to act as guides. Members of the County's Homeless Outreach Team also participated as enumerators in the count and helped lead enumeration teams. Department of Social Services staff who work with homeless families were also included in the planning process and participated as enumerators on the day of the count.

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#### 3A. Continuum of Care (CoC) System Performance

#### Instructions

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

3A-1. Performance Measure: Reduction in the Number of First-Time Homeless. Describe: (1) the numerical change the CoC experienced; (2) the process the CoC used to identify risk factors of becoming homeless for the first time; (3) the strategies in place to address individuals and families at risk of becoming homeless; and (4) the organization or position that is responsible for overseeing the CoC's strategy to reduce or end the number of individuals and families experiencing homelessness for the first time.

#### (limit 1000 characters)

The number of people who became homeless for the first time decreased from 765 persons in 2015 down to 705 in 2016, a decrease of 60 persons. The CoC uses published research, as well as local information from intake caseworkers to identify risk factors. The CoC is also in the process of tracking data on the number of people who apply for homeless programs but are not homeless but who become homeless at a later date. Persons at risk are referred to programs and resources, such as eviction prevention or vehicle repair, that may help prevent homelessness. The CoC has also sought to target certain high risk populations, such as youth exiting foster care, for support. This includes the Transition Aged Youth – Financial Assistance Program (TAY-FAP) that helps pay for housing and living costs to support former foster youth (ages 18-24) while they attend college, university, or trade school. The County's Homeless Services Oversight Council is responsible for overseeing the CoC's strategy.

#### 3A-2. Performance Measure: Length-of-Time Homeless.

CoC 's must demonstrate how they reduce the length-of-time for individuals and families remaining homeless. Describe (1) the numerical change the CoC experienced; (2) the actions the CoC has implemented to reduce the length-of-time individuals and families remain homeless; (3) how the CoC identifies and houses individuals and families with the longest length-of-time homeless; and (4) identify the organization or position that is responsible for overseeing the CoC's strategy to reduce the length-of-time individuals and families remain homeless. (limit 1000 characters)

The average length of time that persons have remained homeless increased from 109 days in 2015 to 117 days in 2016, due to the extremely low housing vacancy rate (>1.6%) in the CoC. The CoC has actively supported efforts by local affordable housing developers to create more units, including selecting a proposed new development to submit for the bonus project funding under this

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CoC NOFA. The CoC has also supported local efforts to create a shared housing program to maximize use of existing housing stock, and has increased housing navigation assistance for Rapid Rehousing programs. The CoC also set aside apartment repair funding for units made available to its Housing First program. The CoC uses the VI-SPDAT and HMIS intake forms to identify and prioritize for assistance persons who have been homeless for the longest length-of-time. The Homeless Services Oversight Council is responsible for overseeing the strategy.

3A-3. Performance Measures: Successful Permanent Housing Placement and Retention

Describe: (1) the numerical change the CoC experienced; (2) the CoCs strategy to increase the rate of which individuals and families move to permanent housing destination or retain permanent housing; and (3) the organization or position responsible for overseeing the CoC's strategy for retention of, or placement in permanent housing. (limit 1000 characters)

In 2016, a total of 158 persons were placed into permanent housing by street outreach and HUD-funded ES and PH-RRH programs, up from 110 in 2015. Housing retention and successful exits have also increased, from 86% who retained housing or exited to other permanent housing in 2015 to 90% in 2016. To increase housing placement, the CoC has used a strategy of increased coordination and cooperation between CoC agencies and community partners, including collaboration between housing navigators from different programs, and increased collaboration with the local Housing retention, the CoC has also increased outreach to landlords. To increase housing retention, the CoC has used a strategy of increasing supportive resources for persons in CoC funded housing. The CoC also consolidated CoC permanent housing resources, creating more continuity of care. The Homeless Services Oversight Council is responsible for overseeing the strategy.

#### 3A-4. Performance Measure: Returns to Homelessness.

Describe: (1) the numerical change the CoC experienced, (2) what strategies the CoC implemented to identify individuals and families who return to homelessness, (3) the strategies the CoC will use to reduce additional returns to homelessness, and (4) the organization or position responsible for overseeing the CoC's efforts to reduce the rate of individuals and families' returns to homelessness. (limit 1000 characters)

Eighteen persons returned to homelessness over a two year period, compared to eleven persons reported in 2015 who returned to homeless over a two year period after exiting permanent housing. While the overall number increased, this was actually a decline in the percentage of persons returning to homelessness, from 14% in 2015 down to 11% in 2016 (a larger number of persons was placed into housing in 2016). Strategies implemented to decrease returns to homelessness included partnering with other agencies to consider whether the leaver could be eligible for other housing. In the coming year, the CoC will be looking at reasons for returns to homelessness and working with partner agencies to try to increase resources to address those reasons. The Homeless Services Oversight Council is responsible for overseeing the

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strategy.

3A-5. Performance Measures: Job and Income Growth Describe: (1) the strategies that have been implemented to increase access to employment and mainstream benefits; (2) how the CoC program-funded projects have been assisted to implement the strategies; (3) how the CoC is working with mainstream employment organizations to help individuals and families increase their cash income; and (4) the organization or position that is responsible for overseeing the CoC's strategy to increase job and income growth from employment, nonemployment including mainstream benefits. (limit 1000 characters)

Strategies that the CoC has implemented to increase access to employment and mainstream benefits include partnering with the local Department of Rehabilitation, the Department of Social Services, the Independent Living Resource Center, and supported employment programs for persons with mental illness. CoC funded programs have been partnered with the local SSI advocacy coalition and SOAR trainings have been provided, along with additional technical assistance from a local attorney specializing in SSI issues. The CoC also created a working group focused on partnering with the local Department of Rehabilitation to assist PSH clients with disabilities with employability assessments and help in employment search. The CoC is working with Department of Social Services employment and benefit programs, including Welfare to Work and subsidized youth employment programs. The Homeless Services Oversight Council is responsible for overseeing the strategy.

3A-6. Did the CoC completely exclude a No geographic area from the most recent PIT count (i.e. no one counted there, and for communities using samples in the area that was excluded from both the sample and extrapolation) where the CoC determined there were no unsheltered homeless people, including areas that are uninhabitable (deserts, forests).

3A.6a. If the response to 3A-6 was "Yes", what was the criteria and decision-making process the CoC used to identify and exclude specific geographic areas from the CoCs unsheltered PIT count? (limit 1000 characters)

3A-7. Enter the date the CoC submitted the 05/25/2017 System Performance Measures data in HDX, which included the data quality section for FY 2016. (mm/dd/yyyy)

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### 3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

#### Instructions

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

#### 3B-1. Compare the total number of PSH beds, CoC program and non CoCprogram funded, that were identified as dedicated for yes by chronically homeless persons in the 2017 HIC, as compared to those identified in the 2016 HIC.

	2016	2017	Difference
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homelessness persons identified on the HIC.	222	251	29

3B-1.1. In the box below: (1) "total number of Dedicated PLUS Beds" provide the total number of beds in the Project Allocation(s) that are designated ad Dedicated PLUS beds; and (2) in the box below "total number of beds dedicated to the chronically homeless:, provide the total number of beds in the Project Application(s) that are designated for the chronically homeless. This does not include those that were identified in (1) above as Dedicated PLUS Beds.

Total number of beds dedicated as Dedicated Plus	0
Total number of beds dedicated to individuals and families experiencing chronic homelessness	0
Total	0

3B-1.2. Did the CoC adopt the Orders of Priority into their standards for all CoC Program funded PSH projects as described in Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing.

# 3B-2.1. Using the following chart, check each box to indicate the factor(s) the CoC currently uses to prioritize households with children based on need during the FY 2017 Fiscal Year.

History of or Vulnerability to Victimization	x
Number of previous homeless episodes	

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Unsheltered homelessness	x
Criminal History	
Bad credit or rental history (including not having been a leaseholder)	
Head of Household with Mental/Physical Disability	

3B-2.2. Describe: (1) the CoCs current strategy and timeframe for rapidly rehousing every household of families with children within 30 days of becoming homeless; and (2) the organization or position responsible for overseeing the CoC's strategy to rapidly rehouse families with children within 30 days of becoming homeless. (limit 1000 characters)

Over the past 2 years, the CoC has increased housing resources and partnerships. The CoC secured 2 new grants to rapidly rehouse house homeless families participating in the CalWORKs program, as well as Child Welfare Services (CWS)-involved homeless families. The CoC also partnered with the Housing Authority to set aside 7 housing vouchers for high needs CWS-involved homeless families, and contracted with a nonprofit to create 8 more units of housing for CWS involved families. The CoC also partners with schools and the Dept. of Soc. Services to rapidly refer homeless families to RRH programs. Since 2015, the number of homeless families has been declining.

To increase PSH for chronically homeless families, the CoC prioritized a bonus project for housing for chronically homeless families in this year's CoC application. The CoC is working towards implementing this strategy over the next 1 ½ years. The Homeless Services Oversight Council is responsible for overseeing the strategy.

# 3B-2.3. Compare the number of RRH units available to serve families from the 2016 and 2017 HIC.

	2016	2017	Difference
Number of CoC Program and non-CoC Program funded PSH units dedicated for use by chronically homelessness persons identified on the HIC.	74	74	0

3B-2.4. Describe the actions the CoC is taking to ensure emergency shelters, transitional housing, and permanent supportive housing (PSH and RRH) providers within the CoC adhere to anti-discrimination policies by not denying admission to, or separating any family members from other members of their family or caregivers based on age, sex, gender, LGBT status, marital status or disability when entering a shelter or Housing.

#### (limit 1000 characters)

The CoC has educated ES, TH, and PH providers about the anti-discrimination policies and has asked agencies to confirm they do not deny or separate based on these issues. All ES facilities have policies to keep families together. At one

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of the two ES facilities, families have their own rooms where all family members can stay together and at the other ES facility, all families are together in a large room. Single persons are assigned to the male or female sections of the shelters based on their self-reported gender. Disabilities are accommodated, as are temporary health issues. Also, interpreters are available on call for those who need sign language interpreters or those for whom English is not their first language. A training for subrecipients was done in January on working with LGBTQ persons, with a special focus on working with persons who are transgendered.

# 3B-2.5. From the list below, select each of the following the CoC has strategies to address the unique needs of unaccompanied homeless youth.

Human trafficking and other forms of exploitation?	Yes
LGBT youth homelessness?	Yes
Exits from foster care into homelessness?	Yes
Family reunification and community engagement?	Yes
Positive Youth Development, Trauma Informed Care, and the use of Risk and Protective Factors in assessing youth housing and service needs?	Yes

# 3B-2.6. From the list below, select each of the following the CoC has a strategy for prioritization of unaccompanied youth based on need.

History or Vulnerability to Victimization (e.g., domestic violence, sexual assault, childhood abuse)	x
Number of Previous Homeless Episodes	
Unsheltered Homelessness	X
Criminal History	
Bad Credit or Rental History	

3B-2.7. Describe: (1) the strategies used by the CoC, including securing additional funding to increase the availability of housing and services for youth experiencing homelessness, especially those experiencing unsheltered homelessness; (2) provide evidence the strategies that have been implemented are effective at ending youth homelessness; (3) the measure(s) the CoC is using to calculate the effectiveness of the strategies; and (4) why the CoC believes the measure(s) used is an appropriate way to determine the effectiveness of the CoC's efforts. (limit 1500 characters)

The CoC has created the Transition Age Youth-Financial Assistance Program (TAY-FAP) to provide assistance with housing and living expenses for youth who have aged out of foster care while they attend college, university, trade school or are getting certifications in trades. This program is highly individualized, flexible and youth driven. The CoC and its partners have

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implemented programs to rapidly house and serve youth who are victims of sex trafficking. The CoC has partnered with local schools to reach youth in schools and also has increased street outreach to reach out of school youth. The PIT Count youth numbers have declined from 2015 to 2017. Also, VI-SPDATs of unsheltered homeless persons in the CoC have shown that the vast majority of persons surveyed who indicated a history of being in foster care were older and had not been in foster care after TAY-FAP was created.

3B-2.8. Describe: (1) How the CoC collaborates with youth education providers, including McKinney-Vento local educational authorities and school districts; (2) the formal partnerships the CoC has with these entities; and (3) the policies and procedures, if any, that have been adopted to inform individuals and families who become homeless of their eligibility for educational services. (limit 1000 characters)

The CoC collaborates with youth education providers to identify and refer homeless families and youth to the CoC for homeless assistance. The CoC also collaborates with McKinney-Vento educational authorities to educate homeless youth and families in shelters or on the streets regarding their educational rights.

CoC staff attend meetings of the Local Educational Agencies and the McKinney-Vento Homeless Education Coordinator sits on the CoC advisory body and coordinates closely with CoC subrecipient agencies. The Coordinator has a formal partnership with ES subrecipients to provide information about educational rights and coordinate educational services, such as tutoring, provided to homeless children and youth at the shelter.

School-aged families entering shelters are informed of their educational rights and referred to the Homeless Education Coordinator. Written materials have also been developed in English and Spanish.

# 3B-2.9. Does the CoC have any written formal agreements, MOU/MOAs or partnerships with one or more providers of early childhood services and supports? Select "Yes" or "No".

	MOU/MOA	Other Formal Agreement
Early Childhood Providers	No	Yes
Head Start	No	Yes
Early Head Start	No	Yes
Child Care and Development Fund	No	No
Federal Home Visiting Program	No	No
Healthy Start	No	No
Public Pre-K	No	No
Birth to 3	No	No
Tribal Home Visting Program	No	No
Other: (limit 50 characters)		

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# 3B-3.1. Provide the actions the CoC has taken to identify, assess, and refer homeless Veterans who are eligible for Veterans Affairs services and housing to appropriate resources such as HUD-VASH and Supportive Services for Veterans Families (SSVF) program and Grant and Per Diem (GPD).

#### (limit 1000 characters)

All Coordinated Entry (CE) sites ask about veteran status and all who identify as veterans are given an opportunity to be referred to veteran specific housing programs. During the most recent Point in Time Count, all unsheltered persons who identified as veterans were asked if they would be interested in being contacted that day by a veterans advocate who could talk to them about veterans housing programs. Those who were interested received a visit by SSVF outreach workers in that area.

The CoC has participated in the creation of a Master List of homeless veterans and actively works to ask homeless outreach teams, County government agencies, service providers, law enforcement and other emergency services to refer any homeless veterans whom they encounter.

# 3B-3.2. Does the CoC use an active list or by Yes name list to identify all Veterans experiencing homelessness in the CoC?

**3B-3.3. Is the CoC actively working with the** Yes VA and VA-funded programs to achieve the benchmarks and criteria for ending Veteran homelessness?

3B-3.4. Does the CoC have sufficient No resources to ensure each Veteran is assisted to quickly move into permanent housing using a Housing First approach?

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#### 4A. Continuum of Care (CoC) Accessing Mainstream Benefits and Additional Policies

#### Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

#### 4A-1. Select from the drop-down (1) each type of healthcare organization the CoC assists program participants with enrolling in health insurance, and (2) if the CoC provides assistance with the effective utilization of Medicaid and other benefits.

Type of Health Care	Yes/No	Assist with Utilization of Benefits?
Public Health Care Benefits (State or Federal benefits, e.g. Medicaid, Indian Health Services)	Yes	Yes
Private Insurers:	Yes	No
Non-Profit, Philanthropic:	Yes	No
Other: (limit 50 characters)		

#### 4A-1a. Mainstream Benefits

CoC program funded projects must be able to demonstrate they supplement CoC Program funds from other public and private resources, including: (1) how the CoC works with mainstream programs that assist homeless program participants in applying for and receiving mainstream benefits; (2) how the CoC systematically keeps program staff up-to-date regarding mainstream resources available for homeless program participants (e.g. Food Stamps, SSI, TANF, substance abuse programs); and (3) identify the organization or position that is responsible for overseeing the CoCs strategy for mainstream benefits. (limit 1000 characters)

Screening and referrals for benefits is part of Coordinated Entry. CoC outreach teams and the Dept. of Social Services (DSS) also created walk in days at DSS for outreach clients to obtain same day benefits. Additionally, DSS staff accompany outreach workers to visit encampments and take applications. DSS and the CoC also operate quarterly, one day, multi-services events where homeless persons can apply for benefits while accessing other services including showers and pet vaccinations. The CoC provides a PH-RRH program for CalWORKS (including TANF) participating families. The CoC also offers a housing program to reunite Child Welfare-involved homeless families and CWS is a Coordinated Entry site. Monthly trainings are held for CoC agencies and other community partners to learn about CalFresh benefits and changes, and the CoC holds bi-monthly meetings on SSI and disability

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programs. The Homeless Services Oversight Council and DSS are responsible for overseeing benefits strategies.

#### 4A-2. Low Barrier: Based on the CoCs FY 2017 new and renewal project applications, what percentage of Permanent Housing (PSH) and Rapid Rehousing (RRH), Transitional Housing (TH), Safe-Haven, and SSO (Supportive Services Only-non-coordinated entry) projects in the CoC are low-barrier?

Total number of PH (PSH and RRH), TH, Safe-Haven and non-Coordinated Entry SSO project applications in the FY 2017 competition (new and renewal)	74.00
Total number of PH (PSH and RRH), TH, Safe-Haven and non-Coordinated Entry SSO renewal and new project applications that selected "low barrier" in the FY 2017 competition.	74.00
Percentage of PH (PSH and RRH), TH, Safe-Haven and non-Coordinated Entry SSO renewal and new project applications in the FY 2017 competition that will be designated as "low barrier"	100.00%

# 4A-3. Housing First: What percentage of CoC Program Funded PSH, RRH, SSO (non-coordinated entry), safe-haven and Transitional Housing; FY 2017 projects have adopted the Housing First approach, meaning that the project quickly houses clients without preconditions or service participation requirements?

Total number of PSH, RRH, non-Coordinated Entry SSO, Safe Haven and TH project applications in the FY 2017 competition (new and renewal).	74.00
Total number of PSH, RRH, non-Coordinated Entry SSO, Safe Haven and TH renewal and new project applications that selected Housing First in the FY 2017 competition.	74.00
Percentage of PSH, RRH, non-Coordinated Entry SSO, Safe Haven and TH renewal and new project applications in the FY 2017 competition that will be designated as Housing First.	100.00%

# 4A-4. Street Outreach: Describe (1) the CoC's outreach and if it covers 100 percent of the CoC's geographic area; (2) how often street outreach is conducted; and (3) how the CoC has tailored its street outreach to those that are least likely to request assistance. (limit 1000 characters)

The Homeless Outreach Team and Supportive Services for Veteran Families outreach teams cover 100% of the CoC's geographic area. Outreach is conducted at least five days a week. The Sheriff's Department also created a two officer team that focuses on working with chronically homeless persons who are frequent systems users and works to divert them by connecting them to housing, treatment, and services. Local hospitals also have been trained to use the VI-SPDAT and survey chronically homeless clients for the purposes of getting them on to the eligibility list for Housing First programs.

The Homeless Outreach Team is specially trained to work with homeless persons with mental illness and can accompany those persons to appointments and help provide transportation. The CoC also works with programs that serve persons with disabilities to do outreach about CoC programs. Materials are also available in Spanish and the CoC works with organizations serving immigrants to do outreach.

#### 4A-5. Affirmative Outreach

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Specific strategies the CoC has implemented that furthers fair housing as detailed in 24 CFR 578.93(c) used to market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, gender identify, sexual orientation, age, familial status, or disability; who are least likely to apply in the absence of special outreach.

Describe: (1) the specific strategies that have been implemented that affirmatively further fair housing as detailed in 24 CFR 578.93(c); and (2) what measures have been taken to provide effective communication to persons with disabilities and those with limited English proficiency. (limit 1000 characters)

Marketing regarding Fair Housing rights and responsibilities are posted in all CoC funded programs. CoC programs also provide materials to all clients on Fair Housing rights and how to enforce them and clients are also informed during intake.

The CoC markets CoC resources to agencies such as the Independent Living Resource Center, Department of Rehabilitation, mental health agencies, other programs for persons with disabilities and agencies that serve communities with limited English proficiency. Outreach materials are available in English and Spanish. Coordinated Entry sites also have Spanish speaking intake staff and other foreign language interpreters are available on an as needed basis. TTY capabilities and American Sign Language interpreters are also available on call. All Coordinated Entry sites are ADA compliant.

# 4A-6. Compare the number of RRH beds available to serve populations from the 2016 and 2017 HIC.

	2016	2017	Difference
RRH beds available to serve all populations in the HIC	74	74	0

4A-7. Are new proposed project applications No requesting \$200,000 or more in funding for housing rehabilitation or new construction?

4A-8. Is the CoC requesting to designate one No or more SSO or TH projects to serve homeless households with children and youth defined as homeless under other Federal statues who are unstably housed (paragraph 3 of the definition of homeless found at 24 CFR 578.3).

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# 4B. Attachments

#### Instructions:

Multiple files may be attached as a single .zip file. For instructions on how to use .zip files, a reference document is available on the e-snaps training site: https://www.hudexchange.info/resource/3118/creating-a-zip-file-and-capturing-a-screenshot-resource

Document Type	Required?	Document Description	Date Attached
01. 2016 CoC Consolidated Application: Evidence of the CoC's communication to rejected participants	Yes	Communication to	09/26/2017
02. 2016 CoC Consolidated Application: Public Posting Evidence	Yes		
03. CoC Rating and Review Procedure (e.g. RFP)	Yes	RFP	09/26/2017
04. CoC's Rating and Review Procedure: Public Posting Evidence	Yes	RFP Posting	09/26/2017
05. CoCs Process for Reallocating	Yes	Reallocating Proc	09/26/2017
06. CoC's Governance Charter	Yes	CoC Governance Ch	09/26/2017
07. HMIS Policy and Procedures Manual	Yes	HMIS Policies and	09/26/2017
08. Applicable Sections of Con Plan to Serving Persons Defined as Homeless Under Other Fed Statutes	No		
09. PHA Administration Plan (Applicable Section(s) Only)	Yes	PHA Administratio	09/26/2017
10. CoC-HMIS MOU (if referenced in the CoC's Goverance Charter)	No		
11. CoC Written Standards for Order of Priority	No		
12. Project List to Serve Persons Defined as Homeless under Other Federal Statutes (if applicable)	No		
13. HDX-system Performance Measures	Yes	HDX System Perfor	09/26/2017
14. Other	No		
15. Other	No		

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# **Attachment Details**

**Document Description:** Communication to Applicants

# **Attachment Details**

**Document Description:** 

# **Attachment Details**

Document Description: RFP

# **Attachment Details**

**Document Description:** RFP Posting

# **Attachment Details**

**Document Description:** Reallocating Procedure

# **Attachment Details**

Document Description: CoC Governance Charter

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# **Attachment Details**

**Document Description:** HMIS Policies and Procedures

# **Attachment Details**

**Document Description:** 

# **Attachment Details**

**Document Description:** PHA Administration Plan

# **Attachment Details**

**Document Description:** 

# **Attachment Details**

**Document Description:** 

# **Attachment Details**

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**Document Description:** 

## **Attachment Details**

**Document Description:** HDX System Performance Measures

# **Attachment Details**

**Document Description:** 

# **Attachment Details**

**Document Description:** 

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# **Submission Summary**

Ensure that the Project Priority List is complete prior to submitting.

Page	Last Updated
1A. Identification	08/30/2017
1B. Engagement	09/25/2017
1C. Coordination	09/26/2017
1D. Discharge Planning	09/25/2017
1E. Project Review	09/26/2017
1F. Reallocation Supporting Documentation	09/26/2017
2A. HMIS Implementation	09/26/2017
2B. PIT Count	09/26/2017
2C. Sheltered Data - Methods	09/25/2017
3A. System Performance	09/26/2017
3B. Performance and Strategic Planning	09/26/2017

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4A.	Mainstream	<b>Benefits</b>	and	Additional
Pol	icies			

4B. Attachments

**Submission Summary** 

09/26/2017

Please Complete No Input Required



#### **REALLOCATION PROCEDURE – July 25, 2017**

### INTRODUCTION

The U.S. Department of Housing and Urban Development (HUD) conducts an annual CoC Program national competition. San Luis Obispo County Planning Department is the lead agency responsible for completing and submitting the application on behalf of the San Luis Obispo County CoC (CA-614).

HUD encourages CoCs to prioritize projects that address the goals of Ending Chronic Homelessness, Youth Homelessness, Veteran Homelessness, and utilize a Housing First approach. Recent guidance in the CoC Competition is steering CoCs to reallocate funds from existing CoC projects that are underutilized, cost-ineffective, under-performing, or obsolete in order to create new Permanent Supportive Housing projects or Rapid Re-Housing projects.

For the FY 2017 Continuum of Care Program Competition, HUD's Policy Priorities as articulated in HUD's Strategic Plan and *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (Opening Doors)* include the priority of <u>Strategic Resource Allocation</u>. HUD strongly encourages CoCs to reallocate renewal funds wherever reallocation would reduce homelessness. San Luis Obispo County CoC's Policy and Procedure for Reallocation will be based on 1) *Performance Measures* as specified in the annual HUD NOFA and 2) *Project Application.* Where the CoC Scoring Committee finds that the renewal project is not performing to full efficacy, a reallocation of funds will be considered. As part of the strategy for funding valuable projects, San Luis Obispo County CoC will select projects that best align with CoC funding priorities.

CoC-funded projects shall be reviewed on an annual basis utilizing Homeless Management Information System (HMIS), Annual Performance Report, and monitoring reports to inform the HSOC ad hoc Grant Review Committee in the performance ranking and rating process for renewal. This review will occur during the application and review process for these grants, and rating criteria will incorporate performance related criteria when recommending which programs should be funded and/or ranked higher than others. The County generally uses the HUD rating criteria when evaluating and prioritizing project applications locally. Some local criteria are also considered when rating and ranking each project application.

The HSOC ad hoc Grant Review Committee will present a funding recommendation to the full HSOC body. The Collaborative Applicant staff receives the HSOC's recommendation to present to the Board of Supervisors for review and approval of the ranking.



#### **Reallocation for New Projects**

Applications for new projects will be considered only from entities that have submitted a Local Application by the deadline and are proposing, in alignment with HUD priorities:

- A) Permanent Supportive Housing (PSH) dedicated to serving chronically homeless individuals, including unaccompanied youth, and/or families; or
- B) Rapid Rehousing (RRH) dedicated to serving homeless individuals, including unaccompanied youth, and/or families coming directly from the streets or emergency shelter, or individuals and/or families who meet the criteria of paragraph (4) of HUD's definition of homeless.
- C) Supportive Services as a Coordinated Entry Point dedicated to serving chronically homeless individuals, including unaccompanied youth, and/or families.

#### **Policy: Strategically Allocate Resources**

Using cost, performance, and outcome data, CoCs should improve how resources are utilized to end homelessness

#### Procedure 1: Comprehensively review project quality, performance, and cost effectiveness.

To provide both project-specific outcome information and CoC-wide contributions, each CoC-funded renewal program will be evaluated based on data entered into HMIS, and formally through the HUD Annual Performance Report (APR) outcomes documented in the APR submitted to HUD. The following performance measures have been identified as reasonable standards for the local jurisdiction:

#### Permanent Housing

a. At least 50 percent of adults leaving the program have the same or more income at exit.

b. At least 25 percent of adults leaving the program have employment income at program exit.

c. The percentage of formerly homeless individuals who remain housed in HUD permanent housing projects for at least 6 months will be at least 77 percent.



#### Transitional Housing

a. At least 50 percent of adults leaving the program have the same or more income at exit.

b. At least 25 percent of adults leaving the program have employment income at program exit.

c. The percentage of homeless persons who have moved from HUD transitional housing into permanent housing will be at least 65 percent.

#### Supportive Services Only

a. At least 25 percent of participants leaving the program exit to permanent housing destinations.

Reduce the number of exited adult participants coming from homelessness from returning to homelessness. The reduction will be based on the percentage of exited adults that returned to homelessness, as measured by homeless clients returning to the program for assistance.

#### Procedure 2: Review Transitional Housing Projects for Reallocation

Recent research shows that transitional housing is generally more expensive and achieves similar or worse outcomes than other housing models serving similar populations. HUD recognizes that transitional housing may be an effective tool for addressing certain needs. If the Transitional Housing project does not meet following needs as ascertained by the NOFA, the project should be strongly considered for reallocation to rapid re-housing or another model:

- 1. Housing for underage homeless youth experiencing homeless
- 2. Safety for persons fleeing domestic violence
- 3. Assisting with recovery from addiction

# *Procedure 3: Reallocate Supportive Services Only (SSO) Projects, excluding SSO for Coordinated Entry/Assessment*

While SSO projects not for Coordinated Entry/Assessment are still allowed in the Continuum of Care competition and are competitive so as long as they demonstrate lowbarrier, Housing First principles, HUD guidance in the FY2016 is steering toward creating SSO Projects for Coordinated Entry/Assessment. In order to support Strategic Reallocation of Resources policy for the Continuum of Care, SSO projects not for Coordinated Entry/Assessment must be reviewed thoroughly to meet threshold criteria.



Joe Madsen, Division Director Transitions Mental Health Association 784 High Street San Luis Obispo, CA 93401

20 September 2017

SUBJECT: FY2017 Continuum of Care Program

Dear Mr. Madsen,

This letter is being written to communicate the results of your submitted applications to the FY2017 Continuum of Care Program. On September 20, 2017 the Homeless Services Oversight Committee recommended the following projects to continue in the application stage:

- Rank 2 North Coastal Permanent Supportive Housing
- Rank 3 SLO City Permanent Supportive Housing

Rank 5 – Bordeaux North County Expansion

Although TMHA presented a strong application for the North Coastal Permanent Supportive Housing (bonus), the HSOC Grant Review Committee selected another housing project to compete.

The County thanks TMHA for their continued work in the Continuum of Care program.

Sincerely,

Ivana Yeung, AICP



Grace McIntosh, Deputy Director Community Action Partnership of San Luis Obispo County 1033 Southwood Drive San Luis Obispo, CA 93401

20 September 2017

SUBJECT: FY2017 Continuum of Care Program

Dear Ms. McIntosh,

This letter is being written to communicate the results of your submitted application to the FY2017 Continuum of Care Program. On September 20, 2017 the Homeless Services Oversight Committee recommended the following projects to continue in the application stage:

Rank 1 – Coordinated Entry Program

The County thanks CAPSLO for their continued work in the Continuum of Care program.

Sincerely,

Ivana Yeung, AICP



Brittany Venia, LCSW People's Self Help Housing 3533 Empleo Street San Luis Obispo, CA 93401

20 September 2017

SUBJECT: FY2017 Continuum of Care Program

Dear Ms. Venia,

This letter is being written to communicate the results of your submitted application to the FY2017 Continuum of Care Program. On September 20, 2017 the Homeless Services Oversight Committee recommended the following project to continue in the application stage:

Rank 8 (Permanent Supportive Bonus)– Rolling Hills II Permanent Supportive Housing

The County looks forward to working with People's Self Help Housing should the project be selected for funding by HUD.

Sincerely,

Ivana Yeung, AICP



Marvin Rose Interim Planning Director

- Adelaida Vacation Rental Ordinance Adopted
- Continuum of Care Program Competition
- Dak Woodland Ordinance Adopted



Use the Department of Planning & Building's <u>PermitView</u> application to explore property information, look-up permit details, pay fees, and schedule



New County

# Continuum of Care Program C

Author: Ivana Yeung Date: Wednesday, July 26, 2017 3:02 PM

Proposals are now being accepted for the Continu



#### **REALLOCATION PROCEDURE – July 25, 2017**

### INTRODUCTION

The U.S. Department of Housing and Urban Development (HUD) conducts an annual CoC Program national competition. San Luis Obispo County Planning Department is the lead agency responsible for completing and submitting the application on behalf of the San Luis Obispo County CoC (CA-614).

HUD encourages CoCs to prioritize projects that address the goals of Ending Chronic Homelessness, Youth Homelessness, Veteran Homelessness, and utilize a Housing First approach. Recent guidance in the CoC Competition is steering CoCs to reallocate funds from existing CoC projects that are underutilized, cost-ineffective, under-performing, or obsolete in order to create new Permanent Supportive Housing projects or Rapid Re-Housing projects.

For the FY 2017 Continuum of Care Program Competition, HUD's Policy Priorities as articulated in HUD's Strategic Plan and *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (Opening Doors)* include the priority of <u>Strategic Resource Allocation</u>. HUD strongly encourages CoCs to reallocate renewal funds wherever reallocation would reduce homelessness. San Luis Obispo County CoC's Policy and Procedure for Reallocation will be based on 1) *Performance Measures* as specified in the annual HUD NOFA and 2) *Project Application.* Where the CoC Scoring Committee finds that the renewal project is not performing to full efficacy, a reallocation of funds will be considered. As part of the strategy for funding valuable projects, San Luis Obispo County CoC will select projects that best align with CoC funding priorities.

CoC-funded projects shall be reviewed on an annual basis utilizing Homeless Management Information System (HMIS), Annual Performance Report, and monitoring reports to inform the HSOC ad hoc Grant Review Committee in the performance ranking and rating process for renewal. This review will occur during the application and review process for these grants, and rating criteria will incorporate performance related criteria when recommending which programs should be funded and/or ranked higher than others. The County generally uses the HUD rating criteria when evaluating and prioritizing project applications locally. Some local criteria are also considered when rating and ranking each project application.

The HSOC ad hoc Grant Review Committee will present a funding recommendation to the full HSOC body. The Collaborative Applicant staff receives the HSOC's recommendation to present to the Board of Supervisors for review and approval of the ranking.



#### **Reallocation for New Projects**

Applications for new projects will be considered only from entities that have submitted a Local Application by the deadline and are proposing, in alignment with HUD priorities:

- A) Permanent Supportive Housing (PSH) dedicated to serving chronically homeless individuals, including unaccompanied youth, and/or families; or
- B) Rapid Rehousing (RRH) dedicated to serving homeless individuals, including unaccompanied youth, and/or families coming directly from the streets or emergency shelter, or individuals and/or families who meet the criteria of paragraph (4) of HUD's definition of homeless.
- C) Supportive Services as a Coordinated Entry Point dedicated to serving chronically homeless individuals, including unaccompanied youth, and/or families.

#### **Policy: Strategically Allocate Resources**

Using cost, performance, and outcome data, CoCs should improve how resources are utilized to end homelessness

#### Procedure 1: Comprehensively review project quality, performance, and cost effectiveness.

To provide both project-specific outcome information and CoC-wide contributions, each CoC-funded renewal program will be evaluated based on data entered into HMIS, and formally through the HUD Annual Performance Report (APR) outcomes documented in the APR submitted to HUD. The following performance measures have been identified as reasonable standards for the local jurisdiction:

#### Permanent Housing

a. At least 50 percent of adults leaving the program have the same or more income at exit.

b. At least 25 percent of adults leaving the program have employment income at program exit.

c. The percentage of formerly homeless individuals who remain housed in HUD permanent housing projects for at least 6 months will be at least 77 percent.



#### Transitional Housing

a. At least 50 percent of adults leaving the program have the same or more income at exit.

b. At least 25 percent of adults leaving the program have employment income at program exit.

c. The percentage of homeless persons who have moved from HUD transitional housing into permanent housing will be at least 65 percent.

#### Supportive Services Only

a. At least 25 percent of participants leaving the program exit to permanent housing destinations.

Reduce the number of exited adult participants coming from homelessness from returning to homelessness. The reduction will be based on the percentage of exited adults that returned to homelessness, as measured by homeless clients returning to the program for assistance.

#### Procedure 2: Review Transitional Housing Projects for Reallocation

Recent research shows that transitional housing is generally more expensive and achieves similar or worse outcomes than other housing models serving similar populations. HUD recognizes that transitional housing may be an effective tool for addressing certain needs. If the Transitional Housing project does not meet following needs as ascertained by the NOFA, the project should be strongly considered for reallocation to rapid re-housing or another model:

- 1. Housing for underage homeless youth experiencing homeless
- 2. Safety for persons fleeing domestic violence
- 3. Assisting with recovery from addiction

# *Procedure 3: Reallocate Supportive Services Only (SSO) Projects, excluding SSO for Coordinated Entry/Assessment*

While SSO projects not for Coordinated Entry/Assessment are still allowed in the Continuum of Care competition and are competitive so as long as they demonstrate lowbarrier, Housing First principles, HUD guidance in the FY2016 is steering toward creating SSO Projects for Coordinated Entry/Assessment. In order to support Strategic Reallocation of Resources policy for the Continuum of Care, SSO projects not for Coordinated Entry/Assessment must be reviewed thoroughly to meet threshold criteria. CA-614 San Luis Obispo Continuum of Care Policies and Procedures

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# I. Continuum of Care Governance

## A. Regulatory Citation

24 CFR Part 578.5 Establishing the Continuum of Care

24 CFR Part 578.7 Responsibilities of the Continuum of Care

## B. Geographic Area of the Continuum of Care

The geographic area of the Continuum of Care CA-614 is named San Luis Obispo County Continuum of Care. The CA-614 CoC covers the seven (7) incorporated cities of San Luis Obispo County, census-designated places, and unincorporated communities county-wide.

## C. Purpose

The U.S. Department of Housing and Urban Development (HUD) Continuum of Care (CoC) Program is designed to assist individuals and families experiencing homelessness by providing the services necessary for the goal of achieving long-term stability and housing retention. The CoC Program promotes community-wide planning and collaboration to find solutions for effectively reducing homelessness in the community. The Continuum of Care shall develop policies and procedures that adhere to the Continuum of Care program requirements as set forth in 24 CFR Part 578.1 to:

- 1. Designate a CoC Lead Agency to serve as the Collaborative Applicant to operate the CoC;
- 2. Designate a Homeless Management Information System (HMIS) Administrator;
- 3. Conduct year-round CoC planning of homeless and homeless prevention housing and services.

## **D.** Mission

Per the San Luis Obispo Countywide Plan to End Homelessness, the mission statement is as follows:

"We envision a future in which the housing and comprehensive services necessary to remain housed are available for all, affording everyone maximum selfsufficiency, and the opportunity to be productive and participating members of our community."

## E. Continuum of Care Governance Charter

The Continuum of Care shall elect an advisory committee to be governed by written bylaws. The Homeless Services Oversight Council (HSOC) is the decision making body of the CoC. The by-laws shall provide procedures for:

- 1. Invitation, selection, term and conduct of CoC board membership and leadership;
- 2. Establishment of committees, appointments, and duties of members;
- 3. Board meeting scheduling, reporting and public participation requirements;
- 4. By-law review and approval.

By-laws are provided in detail in Appendix A: By-Laws, Homeless Services Oversight Council.

HSOC Membership Following 24 CFR 578.5(a), HSOC membership is provided as follows:

- County Board of Supervisors, 1 member
- City Council Members, 7 members, one from each municipality
- County Government Service Providers, 2 members, selected from Behavioral Health, Planning, Social Services, Veterans Services, Probation
- Non-profit Service Providers, 3 regional members
- Affordable Housing Developers, 2 members
- Local Businesses/Business Organizations, 1 members
- Law Enforcement, 1 member
- Local K-12 Academic Institution, 1 member
- Local Health Provider, 1 member
- Local Faith Community, 1 member
- Interested Community, 2 members, preferentially with homelessness experience
- Currently or Formally Homeless Person, 1 member
- Veterans Services Representative, 1 member
- Local University or School of Higher Education, 1 member
- Local Hospital, 1 member
- Victims' Services Representative, 1 member

The HSOC shall meet bi-monthly (six times per year), beginning in January of each year, at a time and date determined by its members. Meeting date changes may be made by a majority vote of the HSOC at any regular meeting. Additional meetings may be scheduled in accordance with and pursuant to the Brown Act, (Government Code, section 54950, et seq.)

# II. Continuum of Care Program Grant Administration

## A. Regulatory Citation

24 CFR Part 578.7 Responsibilities of the Continuum of Care

# B. Collaborative Applicant

The County of San Luis Obispo (the "County") is the CoC's Collaborative Applicant and Recipient of the CoC funds, and is identified with the CoC numerical code: CA-614. The CA-614receives just under \$1 million for projects focused on providing housing solutions and supportive services for the most vulnerable homeless groups in the County. CoC projects in the County are carried out by subrecipients that oversee permanent supportive housing for homeless individuals and families and the Coordinated Entry Program (CEP).

As the Collaborative Applicant, the County submits the annual CoC application to HUD. The CoC grant process is competitive annually. HUD releases a Notice of Funding Availability during late summer-early autumn to delineate the competition's funding priorities and requirements. The County releases a local Request for Proposals from non-profit agencies to apply for CoC funding. CoC CA-614's advisory body Homeless Services Oversight Council (HSOC) reviews the applications from prospective subrecipients and makes a funding recommendation to the County Board of Supervisors, which provides the final authorization to submit the CoC CA-614 application to HUD.

# C. Continuum of Care Registration

The Collaborative Applicant shall be responsible for executing all steps to registering CoC CA-614 to the *e-snaps* grant management program as released each year by HUD. In preparation for registration and submittal, the Collaborative Applicant shall also be responsible for consulting CoC project subrecipients for confirming the accuracy of the

yearly Grant Inventory Worksheet (GIW). The GIW is used by the HUD field office to determine funding renewal amounts for the following year's CoC competition.

# D. Project Evaluation, Monitoring and Performance Ranking

## 1. Evaluation

The Collaborative Applicant shall evaluate CoC subrecipients for meeting performance measures utilizing HMIS reports, Annual Performance Reports, and other documentation as necessary to gauge the CoC's progress in meeting HUD's goals and objectives for *Opening Doors: Federal Strategic Plan for Ending Homelessness*.

## a. Quarterly Evaluation

The Collaborative Applicant will provide both CoC subrecipients, HSOC Finance and Data Committee, and HMIS User group a quarterly reporting of aggregate performance of all CoC Program Grant Projects through a quarterly Annual Performance Report to measure progress in the annual performance goals established in the Continuum of Care Program Grant.

The quarterly reports will cover the following performance periods which will include the quarterly point in time occupancy dates measured in the HUD standardized Annual Performance Report (APR) and Annual Homeless Assessment Report (AHAR):

- November January (APR PIT Date: Fourth Wednesday in January)
- February April (APR PIT Date: Fourth Wednesday in April)
- May July (APR PIT Date: Fourth Wednesday in July)
- August October (APR PIT Date: Fourth Wednesday in October)

In addition to quarterly evaluations of the program, the Collaborative Applicant shall ensure that quarterly LOCCS drawdowns of CoC Program funds are met. The Collaborative Applicant will provide documentation of all program monitoring, evaluation and technical assistance for recipients and subrecipients and maintain copies of all reports and correspondence in the official CoC project files.

## b. Annual Performance Reports

The Annual Performance Report (APR) shall be submitted electronically via SAGE (effective April 2017). The Collaborative Applicant will work with each CoC Recipient in the preparation of their Annual Performance Report. Final APRs will be reviewed and approved by the Collaborative Applicant prior to submission in order to confirm that data being reported to HUD is consistent with data reported in the local HMIS system.

## 2. Monitoring

## a. Regulatory Citation

24 CFR Part 578.23 Executing Grant Agreements

## b. Monitoring Procedure

The goals of monitoring are to ensure the following:

- CoC funds are used effectively to assist the populations they are intended to serve
- Subrecipient projects are compliant with CoC regulations and program requirements as set forth by the regulatory citation
- Improve performance standards for the Continuum of Care.
- i. Monitoring Schedule

Monitoring of subrecipients by the Collaborative Applicant will comprise both of an annual risk assessment and on-site monitoring. A monitoring matrix shall be completed by the Collaborative Applicant as part of the award letter and package to the subrecipient prior to the execution of the Subrecipient Agreement, to be kept as part of the subrecipient's project file ('Monitoring Matrix'- Appendix B). A risk assessment shall be performed during the mid-point of the contract term, and the on-site monitoring shall occur during the third quarter ('Risk Assessment' – Appendix B). On-site monitoring shall be conducted annually based on a date pre-agreed upon by the Collaborative Applicant and subrecipient. In preparation for the monitoring visit, the Collaborative Applicant shall provide the subrecipient the Monitoring Exhibits ('Monitoring Exhibit' – Appendix B).

## ii. <u>Client Records</u>

The Collaborative Applicant shall select at random up to six (6) HMIS records and client file records per project to review on-site. This list generated from the project's HMIS client list shall be identified only by the client's assigned 4-6 digit identification number and birth date; no other identifiers (including name, SSN, gender, demographic) must be used or shared in order to protect client confidentiality. The Collaborative Applicant will send the list of requested files to the subrecipient at least two weeks ahead of the scheduled monitoring date.

## iii. <u>Financial Records</u>

The Collaborative Applicant finance staff will attend the on-site monitoring to confer with the subrecipient financial officer to review quarterly drawdowns from eLOCCS,

documentation for invoice requests, a single audit review, and match documentation (minimum 25% of grant request, less leasing costs). The Collaborative Applicant finance staff will complete the appropriate monitoring exhibits as part of the monitoring period (Monitoring Exhibit' – Appendix B.

## iv. Other Exhibits

The Collaborative Applicant may conduct additional review in preparation of HUD monitoring using selected monitoring exhibits from the CPD Monitoring Handbook 6509.2 Chapter 29: Continuum of Care Program as applicable.

- v. <u>Concerns and Findings</u>
- a) <u>Concern</u>

A concern is a deficiency in program performance not based on statutory, regulatory, or other program requirements. Upon conclusion of the monitoring period, any concerns shall be sent to the subrecipient via formal letter with recommended actions to address concerns and/or to provide technical assistance. Concerns do not require a formal written response to the Collaborative Applicant, but can be provided in addition to responses to findings.

# b) <u>Finding</u>

A finding is a deficiency in a subrecipient's program performance based on material noncompliance with statutory, regulatory, or CoC program requirement for which sanctions or corrective actions are authorized. Upon conclusion of the monitoring period, findings shall be sent to the subrecipient via formal letter to include as part of the finding the Condition, Criteria, Cause, Effect, and Corrective Action. The subrecipient shall respond to the Collaborative Applicant within thirty (30) business days of notification by providing additional information to address the finding, taking the recommended corrective action or suggesting alternatives to correcting the non-compliance.

c) Action Againt Non-Compliance

If at the conclusion of the response period the findings have not been resolved, subrecipients that do not meet do not meet compliance of program and grant management of their CoC programs as documented in the monitoring report may be subject to repayment and/or having their projects reduced in whole or in part and reallocated to other projects during the local competition renewal process as allowed in a HUD Notice of Funding Availability.

## 3. Performance Ranking

CoC-funded projects shall be reviewed on an annual basis utilizing Homeless Management Infomration System (HMIS), Annual Performance Report, and monitoring reports to inform the HSOC ad hoc Grant Review Committee in the performance ranking and rating process for renewal. This review will occur during the application and review process for these grants, and rating criteria will incorporate performance related criteria when recommending which programs should be funded and/or ranked higher than others. The County generally uses the HUD rating criteria when evaluating and prioritizing project applications locally. Some local criteria are also considered when rating and ranking each project application.

The HSOC ad hoc Grant Review Committee will present a funding recommendation to the full HSOC body. The Collaborative Applicant staff receives the HSOC's recommendation to present to the Board of Supervisors for review and approval of the ranking. Further information about ESG-funded programs can be found in the San Luis Obispo County Annual Action Plan.

Program Type

## Permanent Housing

a. At least 54 percent of adults maintain or increase their income from sources other than employment in an operating year.

b. The percentage of formerly homeless individuals who remain housed in HUD permanent housing projects or exited to permanent housing will be at least 80 percent.

c. At least 56 percent of adult participants have mainstream benefits in the last operating year.

## Transitional Housing

a. At least 54 percent of adults maintain or increase their income from sources other than employment in an operating year.

b. At least 20 percent of adults have employment income in an operating year.

c. At least 80 percent of homeless persons that exited from transitional housing left to permanent housing.

d. At least 56 percent of adult participants have mainstream benefits in the last operating year.

#### Supportive Services Only

- a. At least 25 percent of participants leaving the program exit to permanent housing destinations.
- b. At least 56 percent of adult participants have mainstream benefits in the last operating year.
- c. At least 20 percent of adults have employment income in an operating year.
- d. Reduce the number of exited adult participants coming from homelessness from returning to homelessness. The reduction will be based on the percentage of exited adults that returned to homelessness, as measured by homeless clients returning to the program for assistance.

### Action against Poor Performers

CoC and ESG projects will be reviewed at least annually to determine whether the project is meeting the goals and/or performance measures set up during the application. The HSOC and the County as the Collaborative Applicant/Subrecipient will monitor subrecipients annually, review Annual Progress Reports, and discuss ways that the CoC can assist subrecipient agencies in improving performance.

## E. Subrecipient Requirements

The requirements in the articles below detail the program requirements CoC subrecipients must meet prior to the execution of the project.

## i. <u>Coordination with Local Homeless Education Coordinators and Liaisons</u>

Each CoC-funded subrecipient shall ensure that in a client case involving the placement of a homeless family with school aged children into housing funded by the McKinney-Vento Continuum of Care program, the family will receive written materials on the children's educational rights under the McKinney-Vento Act. When distributing such materials, subrecipients should only use those produced by local educational agencies, federal agencies, or national, state or local nonprofits with recognized expertise in the education provisions of the McKinney-Vento Homeless Assistance Act. Additionally, the subrecipients shall make a good faith effort to

coordinate with the County Office of Education to obtain services that may be available under the McKinney-Vento Homeless Assistance Act or other resources intended to assist homeless, school-aged children.

#### ii. <u>Timeliness Standard</u>

Draw down of funds must occur at least once per quarter after eligible activities commence.

#### iii. Environmental Review and Agreement

Subrecipients may not incur or obligate costs until environmental review has been completed and an agreement is in place between the County and the Subrecipient. The subrecipient shall provide all necessary information to the Collaborative Applicant prior to the execution of the contract for the Collaborative Applicant to complete environmental assessment per 24 CFR 58 Environmental Review requirements.

#### iv. Affirmatively Furthering Fair Housing

Subrecipients must maintain copies of their marketing, outreach, and other materials used to inform eligible persons of the program to document compliance with the requirements in 24 CFR 578.93(c).

#### v. Fair Housing and Equal Opportunity.

See 24 CFR 578.93 for specific requirements related to Fair Housing and Equal Opportunity.

#### vi. Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity.

See the Federal Register dated February 1, 2012, Docket No. FR 5359-F-02

vii. <u>Resolution of Outstanding Civil Rights Matters</u>.

See Section III.C.2.d. of the General Section.

viii. <u>Delinquent Federal Debts.</u>

See Section III.C.2.g. of the General Section.

ix. <u>Executive Order 13166, "Improving Access to Services for Persons with Limited</u> <u>English Proficiency (LEP).</u>

See Section III.C.5.c. of the General Section.

x. <u>Economic Opportunities for Low- and Very Low-income Persons (Section 3).</u>

See Section III.C.5.d. of the General Section.

xi. <u>Real Property Acquisition and Relocation</u>.

See Section III.C.5.h. of the General Section.

- xii. <u>Conducting Business in Accordance with Core Values and Ethical Standards/Code of Conduct.</u>
   See Section III.C.5.i. of the General Section.
- xiii. <u>Prohibition Against Lobbying Activities</u>.

See Section III.C.5.j. of the General Section.

xiv. <u>Participation in HUD-Sponsored Program Evaluation</u>.

See Section III.C.5.l.of the General Section.

xv. <u>Drug-Free Workplace.</u>

See Section III.C.5.p. of the General Section.

xvi. <u>Safeguarding Resident/Client Files</u>.

See Section III.C.5.r. of the General Section.

xvii. <u>Compliance with the Federal Funding Accountability and Transparency Act of 2006</u> (Pub. L. 209-282) (Transparency Act), as amended.

See Section III.C.5.t. of the General Section.

xviii. <u>Compliance with Fair Housing and Civil Rights</u>.

See Section III.C.5. a. and III.C.5.b. of the General Section.

#### xix. Lead-Based Paint Requirements.

For housing constructed before 1978 (with certain statutory and regulatory exceptions), subrecipients must comply with the requirements of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.), as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851 et seq.); and implementing regulations of HUD, at 24 CFR part 35; the Environmental Protection Agency (EPA) at 40 CFR part 745, or State/Tribal lead rules implemented under EPA authorization; and the Occupational Safety and Health Administration at 29 CFR 1926.62 and 29 CFR 1910.1025. The subrecipient shall provide a copy of the documentation or exemption worksheet to the Collaborative Applicant prior to the execution of the project.

## III. Coordinated Entry System

## A. Regulatory Citation

24 CFR Part 578.7(a)(8) Responsibilities of the Continuum of Care

24 CFR Part 578.3

Notice CPD 17-01

## **B.** Purpose

The CoC shall establish and operate a Coordinated Entry System (CES) with the goal of increasing the efficiency of local crisis response systems and improving fairness and ease of access to resources, including mainstream resources:

- 1) Helping people move through the system more efficiently by reducing the amount of time people spend moving from program to program before finding the right match;
- Reducing new entries into homelessness by consistently offering prevention and diversion resources upfront, reducing the number of people entering the system unnecessarily; and
- 3) Improving data collection and quality and providing accurate information on what kind of assistance consumers need<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Source: <u>http://www.endhomelessness.org/library/entry/coordinated-assessment-toolkit</u>, December 23, 2013

## C. Coordinated Entry System Operation

## 1. Coverage

The Coordinated Entry System (CES) covers the entire geographic area claimed by the CA-614 CoC in the San Luis Obispo County. All CoC and ESG-funded project agencies must participate in the CES and utilize CoC approved coordinated intake and assessment tools. The CoC's CES is operated by the Community Action Partnership of San Luis Obispo County (CAPSLO) in collaboration with 5Cities Homeless Coalition (5CHC) and El Camino Homeless Organization (ECHO). The three organizations together cover the geographic area of the CoC in the north, central, and south county.

## 2. Accessibility

Effective June 1, 2017 coordinated assessment and intake has been made available at the three main access points by the CES providers in the county and the roll-out of CES to non-COC or ESG-funded projects will continue. Client may receive assessment through any of the three CES entry points. The CES shall be advertised within the CES operating shelters, social media, newspaper and radio. In addition to receiving assessment at the physical locations, the client may elect to call 5CHC hotline to receive assistance and coordinated assessment from 5CHC.

## 3. Assessment Tools

Case managers at CES entry points shall apply the developed Coordinated Assessment tools to clients seeking services. In order to address the large volume of clients requesting assistance, the CES has adopted a two-part standardized screening and assessment process:

## Pre-screening: Prevention and Diversion

Trained case managers will meet with clients that present at CES entry points and conduct an initial screening using the standardized Prevention and Diversion tool adopted by the three agencies. This tool is used to determine whether clients will need a greater intensity of services and/or housing, or whether the provision of available services will be the only action necessary to assist the client with self-resolution.

## VI-SPDAT

If, after the initial Prevention and Diversion tool has been applied, the client is deemed to require more intensive services and/or housing, the case manager will then utilize the standardized VI-SPDAT tool to determine the vulnerability of the client and their household. Upon completion of the assessment tool, the case manager will enter the information into the CES database software. The VI-SPDAT score of the clients, along with regular case

management conferences, will assist in the determination of the ranking of clients in the order in which they receive housing.

#### 4. Subpopulation Protections

#### Victims of domestic violence, dating violence, sexual assault, or stalking

Victim and non-victim housing/service agencies must prioritize safety and equitable access to housing and services for persons fleeing or attempting to flee domestic violence, sexual assault, or stalking (DV). Case managers at the CES entry points shall be trained to conduct a danger or risk assessment for any individual who presents a fleeing domestic violence or reveals information implying that the client may be dealing with domestic violence issues; if the client is determined to be a victim of DV, the case manager shall immediately contact DV resources in the County, wherein the domestic violence provider will create a plan for safety with the client. Any information conducted during the screening of the client by the DV provider shall follow all protocols to ensure confidentiality and privacy rights for all individuals to not disclose personally identifying information and adhering to HIPAA, VAWA, and other federal laws in place to protect survivors. If the referral to domestic violence agencies results in the household not being referred to a domestic violence shelter, the Coordinated Assessment System or receiving agency will proceed with the standard methods of assessment and prioritization and the victimization experience will be considered in the assessment and service needs evaluation; however, the client's identify will be masked and remain anonymous unless otherwise indicated by the client. During the stay of the of the DV client at the non-victim shelter, if at all possible, the shelter should provide accommodations at a safe and secure location.

#### Gender Identity Non-Discrimination Policy

Regulatory Citation 24 CFR Part 5 The CoC adopts the provisions set forth by the September 2016 final rule for 'Equal Access Rule'. The CoC and its programs shall ensure equal access for individuals in accordance with their gender identity in programs and shelter funded under programs administered by HUD's Office of Community Planning and Development (CPD). This rule builds upon HUD's February 2012 final rule entitled "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity" (2012 Equal Access Rule), which aimed to ensure that HUD's housing programs would be open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status. The CoC shall ensure that recipients and subrecipients of CPD funding—as well as owners, operators, and managers of shelters and other buildings and facilities and providers of services funded by CPD—grant equal access to such facilities and services to individuals in accordance with an individual's gender identity.

## D. Prioritization for CoC Assistance

## 1. Determining and Prioritizing which Eligible Individuals and Families will Receive Transitional Housing

When a permanent, supportive housing bed becomes available in a CoC funded permanent, supportive housing program, the CoC subrecipient must use the *Orders of Priority* set forth in Notice CPD-14-012 published by the U.S. Department of Housing and Urban Development (HUD) when determining whom to place in the available unit. All subrecipient agencies must use the common intake and assessment form (when available) as developed by CoC participating agencies when determining priority for assistance. Also, an individual or family's ability to sustain housing should not be a threshold requirement. All CoC funded transitional housing beds are currently limited to households without children, so no families will be served in CoC funded transitional housing beds.

Only persons who are literally homeless per the federal definition will be eligible for CoC transitional housing assistance. Non-profit subrecipients providing this assistance must document that the household is homeless and maintain this documentation for 5 years after expenditure of all funds from the grant under which the participant was served. No financial assistance may be provided to a household for a purpose and time period supported by another public source.

## 2. Determining and Prioritizing which Eligible Individuals and Families will Receive Rapid Re-Housing Assistance

There are currently no CoC funded Rapid Re-Housing programs. If such a program is developed using CoC funds, all subrecipient agencies must use the common intake and assessment form (when available) as developed by the CoC participating agencies when determining priority for assistance. An individual or family's ability to sustain housing should not be a threshold requirement.

Only persons who are literally homeless per the federal definition will be eligible for CoC rapid re-housing assistance. Non-profit subrecipients providing this assistance must document that the household is homeless and maintain this documentation for 5 years after expenditure of all funds from the grant under which the participant was served. No financial assistance may be provided to a household for a purpose and time period supported by another public source.

## 3. Standards for Determining what Percentage or Amount of Rent Each Program Participant Must Pay while Receiving Rapid Re-Housing Assistance

There are currently no CoC funded Rapid Re-Housing programs.

If future CoC funds are used for Rapid Re-Housing programs, each program participant on whose behalf rental assistance payments are made must pay a contribution toward rent. Additional criteria will be developed if a Rapid Re-Housing program is developed using CoC funds.

Subrecipients must examine a program participant's income initially, and at least annually thereafter. Additionally, a resident may request an interim reexamination of income if there is a change in the family composition (i.e. birth of a child) or a decrease in the resident's income during the year. Adjustments to a program participant's contribution toward the rental payment must be made as changes in income are identified.

## 4. Determining and Prioritizing which Eligible Individuals and Families will Receive Permanent Supportive Housing Assistance

All subrecipient agencies must use the Coordinated Assessment tools as developed by CoC participating agencies when determining priority for assistance. An individual or family's ability to sustain housing should not be a threshold requirement. However, all beds should be prioritized for chronically homeless individuals and families first.

The only persons who may be served by any permanent supportive housing projects are: 1. Those who come from the streets, emergency shelters, safe havens, institutions, or transitional housing (persons coming from transitional housing must have originally come from the streets or emergency shelters)

Disabled individuals and families who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and are living in transitional housing are eligible for permanent supportive housing even if they did not live on the streets, emergency shelters, or safe havens prior to entry in the transitional housing.
 Persons exiting institutions where they reside for 90 days or less and came from the streets, emergency shelter, or safe havens immediately prior to entering the institution.

Non-profit subrecipients providing this assistance must document that the household is homeless and maintain this documentation for 5 years after expenditure of all funds from the grant under which the participant was served. No financial assistance may be provided to a household for a purpose and time period supported by another public source.

There is currently only one CoC funded unit (with 3 beds) for a family and one CoC funded unit for a couple. The remaining units are for single individuals.

# IV. Written Standards for Administering Assistance

## Evaluating Individuals' and Families' Eligibility for Assistance

To be eligible for CoC assistance, all households must meet the definition of homeless or at-risk of homelessness posted in the federal register on December 5, 2011 (see definitions below) and in the Continuum of Care Program regulations. For determining eligibility under homeless status, 576.500 (b) must be followed. For determining eligibility under at risk of homelessness status, 576.500 (c) must be followed. See the general processes below.

For determining eligibility for homeless assistance, third party documentation is preferred. If third party documentation of homeless status is not available, then intake worker observation is the second preferable method for determining eligibility for assistance for homeless status. If neither third party documentation nor intake worker observation is possible, certification from the person seeking assistance is the last resort for determining homeless status. Records contained in an HMIS or comparable database used by victim service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of the entry and the change made. For determining eligibility for persons at risk of becoming homeless, evidence must be provided that 1) the participant meets the criteria of at risk of homelessness including documentation for determining annual income, 2) the program participants certification on a form that the participant has insufficient financial resources and support networks (i.e family, friends, faith based networks, etc.), and 3) reliable evidence to show the program participant does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place not meant for human habitation. Reliable evidence in order of preference includes 1) source documents (i.e. unemployment compensation statement, notice of termination from employment, health care bill showing arrears, etc.), 2) a written statement by the relevant third party such as the former employer or relative (only if source documents are not available), or 3) a written statement by intake staff describing the efforts taken to obtain the evidence.

Once it is determined that the client meets the homeless or at-risk definition, the income criteria, and housing status criteria based on the regulations, it is important to then assess which CoC program is the most appropriate program for that individual or household (Permanent Supportive Housing, Transitional Housing, or Supportive Services Only).

## Ineligibility

For each individual and family determined ineligible to receive CoC assistance, the record must include documentation of the reason for that determination.

#### **Occupancy Charges**

Occupancy charges may not exceed the highest of (1) 30 percent of the family's monthly adjusted income (adjustment factors include the number of people in the family, age of family members, medical expenses, and child care expenses; (2) 10 percent of the family's monthly income. Furthermore, income of program participants must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a).

## **Program Fees**

Subrecipients may not charge a program participant a program fee.

## Match

All eligible funding costs, except leasing, must be matched with no less than 25 percent cash or in-kind match by the CoC. The match must be provided on a grant-by-grant basis.

#### **Program Income**

Rents and occupancy charges collected from program participants are program income. The rents and occupancy charges collected from residents of transitional housing may be reserved, in whole or in part, to assist the residents from whom they are collected to move to permanent housing.

### Occupancy Agreements and Leases

Subrecipients must have signed occupancy agreements or leases (or subleases) with program participants residing in housing.

### Confidentiality

All records containing protected identifying information of any individual or family who applies for and/or receives Continuum of Care assistance will be kept secure and confidential.

Secure means the files are locked and access is limited only to personnel or staff working with the clients.

The address or location of any family violence project assisted with Continuum of Care funds will not be made public, except with written authorization of the person responsible for the operation of the project; and

The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with State and local laws regarding privacy and obligations of confidentiality;

#### **Records Retention**

All records pertaining to CoC funds must be retained for at least 5 years from the date of expenditure of all funds from the grant.

## V. Homeless Management Information System (HMIS)

Participation in the local HMIS program is a requirement to receiving CoC and ESG funds. The County of San Luis Obispo is the HMIS lead agency and staffs the HMIS Administrator in the Department of Planning and Building. All participating agencies must comply with the Countywide HMIS Policies and Procedures Manual. County of San Luis Obispo Homeless Management Information System

# **Policies and Procedures**

Originally approved: 1/1/2010

County Of San Luis Obispo 976 Osos Street San Luis Obispo, CA 93408 (805) 788-2187

Version 2 November 27, 2012 Version 3 January 6, 2014 Version 4 November 14, 2014

San Luis Obispo Homeless Management Information System

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# **Contact Information**

# **County of San Luis Obispo**

HMIS Lead Agency County of San Luis Obispo Department of Planning and Building 976 Osos Street, Room 300 San Luis Obispo, CA 93408

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Morgan Torell Planner III, Program Manager County of San Luis Obispo 807-781-5113 mtorell@co.slo.ca.us

## **HMIS Vendor**

Bell Data Systems, Inc. PO Box 2785 Matthews, NC 28106

# **Governing Regulations and Standards**

The HMIS program is designed to comply with the requirements of the CoC Program Interim Rule at 24 CFR 578 (for CoC programs), the HMIS Data Standards

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published in 2014, which allow for the collection and standardization for collection of client and project-level data, and the most current HMIS Privacy and Security Notice.

# **1. OVERVIEW**

This document provides the framework for the ongoing operations of the San Luis Obispo County Homeless Management Information System here after referred to as "HMIS" and "SLO County-HMIS." The United States Department of Housing and Urban Development (HUD) requires all grantees and subrecipients receiving Emergency Solutions Grant (ESG) and Continuum of Care (CoC) funds participate in HMIS, with the exception of domestic violence women's shelters (DV providers). These DV providers must enter client data into a comparable HMIS database.

While CoC's cannot require non-funded providers to participate in the HMIS, SLO County CoC works closely with non-funded agencies to articulate the benefits of the HMIS and to strongly encourage their participation in order to achieve a comprehensive and accurate understanding of homelessness countywide.

The HMIS and its operating policies and procedures are structured to comply with the most recently released HUD Data and Technical Standards for HMIS. Recognizing that the Health Insurance Portability and Accountability Act (HIPAA) and other Federal, State and local laws may further regulate agencies, the San Luis Obispo County HMIS may negotiate its procedures and/or execute appropriate business agreements with Partner Agencies so they are in compliance with applicable laws.

# **Roles and Responsibilities**

The CoC governing body, the Homeless Services Oversight Council (HSOC), will periodically review HMIS data. Its roles and responsibilities are further outlined in the HSOC by-laws. The County (the HMIS Lead Agency) is responsible for administering the HMIS program, training/monitoring users, and ensuring compliance with regulatory requirements (see "2. Purpose").

# Purpose

The purpose provides the mission, goals, and benefits of the HMIS.

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# **Governing Principles**

Governing Principles establish the values that are the basis for all policy statements and subsequent decisions.

# **Operating Procedures**

Operating Procedures will provide specific policies and steps necessary to inform, instruct, and educate users of the HMIS system.

# **Obligations and Agreements**

It is the obligation of each agency to read, understand, and adhere to the policies, procedures, and conditions set forth in this document, all participants in the HMIS agree to follow the policies and procedures set forth by HUD in the current HMIS data and Technical Standards.

# 2. Purpose

# **Long-term Mission**

The long-term Mission of HMIS is to enhance service delivery and data collection capabilities by sharing information. Accurate information will put the County of San Luis Obispo in a better position to request funding from various sources and help plan better for future needs.

HMIS is designed to be an integrated network of homeless and other service providers that use a central database to collect, track and report uniform information on client needs and services. This system will not only meet Federal requirements but also enhance service planning and delivery.

# **Fundamental goal**

The fundamental goal is to document the demographics of homelessness in San Luis Obispo County according to the HUD HMIS directive. Data that is gathered via intake interviews and program participation will be used to complete HUD Annual and Quarterly Progress Reports. HUD required data may also be analyzed to provide unduplicated counts and anonymous aggregate data to policy makers, service providers, advocates, and consumer representatives.

# **Potential benefits**

Potential benefits for homeless men, women, children and case managers include: improved service coordination by sharing information among agencies who are serving the same clients.

Potential benefits for agencies and program managers come as aggregated information is used to develop a more complete understanding of clients' needs and outcomes, and then used to advocate for additional resources, complete grant applications, conduct evaluations of program services, and report to funding agencies such as HUD.

Potential benefits for county-wide data collection and policy makers lie in the County's participation in HMIS providing the capacity to generate HUD Annual and Quarterly Reports for agencies and allowing access to aggregate information both at the local and county level that will assist in the completion of other service reports used to inform policy makers aimed at addressing and ending homelessness at local, state and federal levels.

# 3. GOVERNING PRINCIPLES

Described below are the overall governing principles upon which all decisions pertaining to HMIS are based.

Participants are expected to read, understand, and adhere to the spirit of these principles, even when the Policies and Procedures do not provide specific direction.

# Confidentiality

The protection of clients' rights and privileges is crucial to the successful operation of HMIS. These policies and procedures will ensure clients' privacy without impacting the delivery of services.

Policies regarding client data are founded on the premise that a client owns his/her personal information. Policies are in place to protect client, agency, and the County of San Luis Obispo's interests. Collection, access and disclosure of client data through HMIS will only be permitted by the procedures set forth in this document.

# **Data Integrity**

Client data is a valuable and sensitive asset of HMIS. These policies will ensure integrity and protection of this asset from accidental or intentional unauthorized modification, destruction or disclosure.

# **System Availability**

The availability of a centralized data repository is necessary to achieve an aggregation of unduplicated homeless statistics. The County of San Luis Obispo will strive for the broadest deployment and availability of the HMIS System.

# Compliance

Violation of the policies and procedures set forth in this document will have serious consequences. Any deliberate or unintentional action resulting in a breach of confidentiality or loss of data integrity may result in the withdrawal of system access for the offending entity.

# 4. ROLES and RESPONSIBILITIES

# The County of San Luis Obispo

- HMIS direction and guidance
- Approval of HMIS policy forms and documentation
- Agency participation and feedback
- HMIS Funding
- Release of aggregate data
- Authorizing agent for Partner Agency User Agreements
- Resolution of breaches in security cases
- Compliance with HMIS Policies & Procedures

### **HMIS Manager**

- Liaison to HUD for HMIS
- Represent the Project in negotiations with vendor concerning contracts and money.
- Evaluate potential Partner Agencies for appropriateness
- Compliance with HMIS Policies & Procedures

# HMIS System Administrator

• Creation of Project forms and documents

- Monitoring end user licenses
- Point of contact with software vender
- User administration
- Add, edit and remove user rights
- Manage concurrent licenses
- Training curriculum development
- Ensure documentation of training
- Provide confidentiality training
- Provide initial software training for HMIS Agency Administrators and Users Outreach to provide user support
- Provide helpdesk support
- Monitor data quality and adherence to HUD Standards Application
   Customization
- Aggregate data reporting and extraction per agency needs.
- Assist Partner Agencies with agency-specific data collection and reporting Needs
- Hold Partner Agency User Agreements
- Compliance with HMIS Policies & Procedures .
- Maintain a file of all signed Partner Agency Agreements & Termination documents

# Partner Agency

### HMIS Agency Administrator (subrecipient agency)

- Designator of Partner Agency HMIS system users and Authorizing Agent for user ID requests
- Train new HMIS users within the Partner Agency
- Monitor compliance with confidentiality, security, and policies and procedures.
- Liaison with the HMIS System Administrator for issues or concerns with the HMIS system
- Monitor and facilitate resolutions to missing or incorrect data entered by users in the Partner Agency
- Compliance with HMIS Policies & ProceduresDesignator of Partner Agency Technical support
- Monitor Agency compliance with Policies & Procedures
- Hold executed Client Informed Consent forms
- Manage User licenses
- Detect and respond violations of the Policies and Procedures

# HMIS Agency Security and Confidentiality Officer

• Trains users to the standards of security and confidentiality Monitors its agency and users regularly.

• Compliance with HMIS Policies & Procedures

# HMIS Agency Technical Support

- Monitor security of staff workstations
- Maintain their agency's internet connectivity
- Load virus protection and spyware detecting software on all computers that access HMIS and make sure it is run at least once a week
- Compliance with HMIS Policies & Procedures

# Partner Agency User

- Attend and participate in HMIS training provided by the County of San Luis Obispo
- Safeguard client privacy through compliance with confidentiality policies
- Collect data as specified in end user training and as directed in compliance with the policies and procedures.
- Enter data within 14 days of collection
- Run data integrity reports, run down discrepancies and make corrections
- Compliance with HMIS Policies & Procedures

# **5. OPERATING PROCEDURES**

# **HMIS** Participation

The HMIS Manager shall determine if an agency's participation in the HMIS is appropriate and if there are adequate user licenses available, an invitation will be issued and if the agency is agreeable a meeting will be set up with the HMIS System Administrator to create a plan for optimal data entry with the least negative impact on personnel and resources. Optimally current procedures will be evaluated and modified to utilize the HMIS system to streamline efforts and improve client service. The HMIS System Administrator will create the necessary customizations in the system, setup a training schedule and perform a security assessment. Agencies participating in the SLO County- HMIS shall commit to abide by the

agencies participating in the SLO County- HMIS shall commit to abide by the governing principles of HMIS and adhere to the terms and conditions set forth in this document.

# **Minimum Participation Standards**

HMIS partner agencies and users must collect and enter all of the prescribed data elements set forth in the August 2014 HMIS Data Standards (and revised thereafter) both universal and project specific to the agencies project for all clients receiving services. Additionally, all participating agencies are also responsible to ensure that optional data elements agreed upon by the HMIS steering committee are collected and entered into the HMIS system.

# **Connectivity and Computer Requirements**

Participating Agencies must have Internet connectivity for each workstation accessing the HMIS. Specific requirements for browser type and configurations must be available and adhered to for the operation of the HMIS system. To optimize performance, all agencies are encouraged to secure a high speed Internet connection.

# **Site Security**

### Assessment

All participating agencies must provide, install, and maintain virus protection software that scans documents on open and provide for daily updates. All participating agencies must also have active up to date firewall protection on either the workstations or on the network that the workstations receive their internet connection through.

Prior to allowing access to the HMIS system, the Partner Agency's HMIS Agency Administrator and or the agencies HMIS Technical Support person, will meet with the HMIS System Administrator or representative to review and assess the security measures in place and determine a plan if more security is needed. Compliance documentation is necessary before any access to the HMIS system will be allowed.

This review shall in no way reduce the responsibility for agency information security, which is the full and complete responsibility of the Partner Agency, its Program Administrator, and Technical Support personnel.

# Workstation

Prior to requesting user access for any staff member, the HMIS Agency Technical Support person and or the HMIS Agency Administrator will need to assess the operational security of the user's workspace by confirming that each workstation has:

- Anti-spyware software and virus protection properly installed
- A full-system scan has been performed within the last week
- Each workstation has and uses a hardware or software firewall.
- Each workstation is positioned to insure that no other person, except the one person operating the computer, can view the screen
- The workstation is in a secure location
- Each workstation is set up to allow the user to lock the computer if they need to step away, and to automatically lock when not in use for a specific time.

# Training

All users accessing HMIS must first complete training and pass a proficiency test. Users must read, understand, and sign the Partner Agency End User Agreement. All users will be held accountable to that agreement. Training for privacy and security measures will occur annually, and all participating agencies and users must attend the training. HMIS Agency Administrators are expected to monitor confidentiality and security on a regular basis.

Users must also read and understand the HMIS Data Standards published in August 2014 (and revised thereafter).HMIS Agency Administrators and initial users will be trained by the HMIS System Administrator. New users will be trained by the HMIS Agency Administrator.

Users will be trained in the operation of the HMIS system (how to access the system, how to enter data, how to run reports), and on Confidentiality policies and procedures. Agency or project specific training is the responsibility of the agency.

# Quiz

At the end of the training, the user will be given a quiz on proficiency of how to enter the data for the kind of client and project as well as on confidentiality. The user must pass with 100% accuracy before being given access to the system.

### Follow-up

The County of San Luis Obispo will provide remote or on-site follow-up training at each participating Partner Agency as needed. Before a Partner Agency "goes live," the HMIS System Administrator will provide remote assistance and make on-site visits as needed to ensure that the Partner Agency becomes proficient in the use of HMIS.

The County of San Luis Obispo will provide regular training for HMIS Agency Administrators, and users as needed.

# **User Accounts & Passwords**

### Access Rights

Access to the HMIS system will only be approved for those staff members that require access to perform their job duties. The user's access rights will be determined by the Partner Agency Program Administrator and or the HMIS Agency Administrator in collaboration with the HMIS System Administrator.

### **Password and User ID Assignment**

Upon successful completion of training and signing the Partner Agency End User Agreement, the user will be assigned a unique ID and password to access the rights specific to that user within that agency. A user shall not allow anyone else use of their assigned unique user ID. A user shall never use an ID that is not assigned to them nor shall passwords be shared and or communicated in any format, to do so is considered a breach of security and will have severe consequences.

### **Changing Passwords**

When the user logs onto the system for the first time they will be prompted to change their password to a password only they know. Passwords must consist of at least 8 characters, a combination of at least one upper case letter, at least one lower case letter, and at least one special character,

Passwords must be changed every 90 days. If they are not changed within that time period, they will expire and the user will be locked out of the system. Three consecutive unsuccessful attempts to login will disable the User ID until the HMIS System Administrator reactivates the account [These standards are required by the software and HUD Data and Technical Standards].

In the event a user's password has expired, or the user forgets his or her password the user or the HMIS Agency Administrator may contact the HMIS System Administrator who will reset the Agency End User's password.

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# **Changing Users' Rights**

As a user's needs change the rights assigned to that user within the HMIS system need to change as well. It is important that the HMIS Agency Administrator notify the HMIS System Administrator of these changes as soon as possible so that rights can be added and removed as is appropriate.

# **Deactivating Accounts**

It is important that a user's account be deactivated in the system when he or she leaves the agency or otherwise becomes inactive. It is a breach of security to have unused user accounts active. The HMIS Agency Administrator should, in a timely manner, alert the HMIS System Administrator that the user should no longer be active in the system.

Access may be immediately rescinded when any HMIS user is suspected of breaching the Partner Agency User Agreement, violating the Policies & Procedures, or breaching confidentiality or security. Access will remain blocked while an investigation by the County of San Luis Obispo and the partner agency is conducted. If the user is found to have breached or violated the above, and the Partner Agency does not otherwise permanently inactivate the user from the system (termination of employment, reassignment of duties) the County of San Luis Obispo has the right to permanently inactivate the account thereby denying access to the system for that user.

# **Collection and Entry of Client Data**

Each Partner Agency will develop policies, procedures, and confidentiality rules for collecting HMIS data in accordance with HUD's most recent Final Data and Technical Standards and their own agency's needs. Client Data will be gathered according to these policies, procedures and confidentiality rules.

# **Client Authorization**

Client Data may only be entered into the HMIS with client's authorization to do so. Client Data will only be shared with Partner Agencies if the Client consents, has signed the Client Informed Consent & Release of Information Authorization, and the signed Informed Consent & Release of Information Authorization is available on record.

The HMIS System allows for selective sharing as well as selected sharing of specific groups of data. All Universal and Program Data Elements from the

HUD HMIS Data and Technical Standards current Final Draft should be collected, subject to client's consent.

# Data Integrity

Client Data will be entered into the HMIS system within two weeks of client data intake. All Client Data entered into the HMIS system will be kept as accurate and as current as possible.

Hardcopy or electronic files will continue to be maintained according to individual program requirements, and according to the HUD HMIS Data and Technical Standards current Final Draft.

Partner Agencies are responsible for the accuracy, integrity, and security of all data input by said Agency.

Note: Refer to Bell Data Systems Inc. User Manual and/or Training Materials for specific data entry and data integrity guidelines.

# Entry, Annual, Update and Exit Data

Client program entry and exit dates shall be recorded for all program participants. Entry dates should record the first day of services or program entry with a new program entry date for each period/episode of services. Exit dates should record the last day of residence in a program's housing before the participant leaves the shelter/housing or the last day a services was provided in a program.

Annual data for each program participant must be collected and entered into the system within thirty days prior or thirty days after the program entry anniversary date. Updates must be collected and entered at the designated interval mandated by the project's funding requirements. Updates may also be entered at any interval or milestone the agency has in their own procedures.

### **Data Quality Monitoring**

The purpose of data quality monitoring is to provide a tool for all agencies and their users to find and resolve errors, missing data, timeliness issues, and need for retraining. The secondary purpose of the data quality monitoring is to correct these issues in a timely manner so that reporting for funding sources, including HUD, will be accurate, complete, and timely.

The HMIS System Administrator will perform regular data integrity checks on the HMIS data, which will include the following steps:

- Run and distribute monthly Data Quality reports that check for missing or incongruent data and timeliness of entry for each agency and cooperative project. Run data checking queries to monitor new agencies or users to catch errors and need for additional training.
- Notify HMIS Agency Administrator of findings and timelines for correction;
- Re-run reports for errant agencies/programs, as requested. Follow up with HMIS Agency Administrators if necessary;
- Notify HMIS Agency Manager and/or Agency Executive Director if HMIS Agency Administrator is not responsive to required corrective actions;
- Notify the CoC chair and HMIS Manager regarding any uncorrected data quality issues.

# **Release and Disclosure of Client Data**

# Sharing of Data

# **Client-Specific Data**

Client specific data from the HMIS system may be shared with partner agencies with both the clients' and agency's authorization. Other non-HMIS inter-agency agreements do not cover the sharing of HMIS data. The agency's authorization to share data with partner agencies shall be submitted to the County at least annually on a County provided form. Sharing of client data may be limited by project specific confidentiality rules.No client-specific data will be released or shared outside of the HMIS partner agencies unless the client gives specific written permission or unless withholding that information would be illegal.

Note that services may NOT be denied if client refuses to sign Release of Information or declines to state any information. Depending on the limitation the client invokes the user will enter the information and lock the pages not released by the client, limit the release within the system to the agencies allowed by the client, enter no releases to other agencies, or not enter any information into the HMIS system.

If a project has a client who refuses to allow their data to be entered into the HMIS system, the HMIS Agency Administrator must notify the HMIS Manager and the HMIS System Administrator so that they can correctly report the number of clients being served in a specific project that are not in the HMIS system. The HMIS Agency Administrator must also notify the HMIS Manager

and the HMIS System Administrator when that client is no longer being served by that project.

# **Clients' Rights to Data**

Upon written request, clients shall be given a printout of all data specifically relating to them, within 14 working days (or 14 working days after the data has been entered if the data has not been entered at the time the request is made.) A client may also request in writing a report of data sharing events, including dates, agencies, persons, and other details pertaining to their client specific data within 14 working days (or 14 working days after the data has been entered if the data has not been entered at the time the request is made.)

# Aggregate Data

**Aggregate data** that does not contain any client specific identifying elements may be shared with internal and external agents without specific permission. This policy will be made clear to clients as part of the Informed Consent procedure.

### Agency Responsibility

Each Agency is responsible for its own internal compliance with HUD HMIS Data and Technical Standards, including the designation of a HMIS Security and Confidentiality Officer that monitors its agency and users regularly.

# **Technical Support**

Support Requests include issue reporting, requests for enhancements (features), or other general technical support. Agency Administrators and users shall submit support requests to the HMIS System Administrator. The County of San Luis Obispo will only provide support for issues specific to the HMIS software and systems.

# **Request for Support**

The following is the preferred procedure when a user requires technical support:

The user should evaluate the immediacy of the issue. If the user needs immediate resolution of the issue because the issue is hindering the user from being able to enter the data into the system, the user should try to

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contact their HMIS Agency Administrator. If that person is not available, the user should attempt to contact the HMIS the System Administrator. If the HMIS System Administrator cannot be reached then the user may contact Bell Data Systems help desk. Bell Data Systems is located on the East Coast and therefore not available to contact after 2:00 PM, but is available as early as 5:00 AM. (depending on Daylight Savings time).

Most common emergent issues are a forgotten password, a password that is not working, or being locked out from too many failed attempts to log in.

Bell Data Systems will not issue new user accounts or change user rights without prior authorization from the HMIS System Administrator.

If the issue is not immediate or is a suggestion, the user should discuss the issue with the HMIS Agency Administrator for appropriateness before submitting it. The user or the HMIS Agency Administrator may email the HMIS System Administrator specifying the severity of the issue and its impact on their work, specific steps to reproduce the issue, and any other documentation that might facilitate the resolution of the issue (screen shots can be very helpful). The user should also provide contact information and best times to be reached.

### Changes to the System

The HMIS System Administrator will evaluate the request and respond accordingly. Agency-specific customizations will be evaluated for their impact on the other agencies usability of the system and the system as a whole.

If the HMIS System Administrator determines that the cause of the reported issue is outside the scope of control of the HMIS software and systems the issue may be returned to the user or a meeting with the agency's HMIS Technical Support may be necessary.

The HMIS System Administrator may consolidate such requests from multiple Partner Agencies, if appropriate, and strive to resolve issues in priority order according to their severity and impact.

In cases where issue resolution may be achieved by the end user or other Partner Agency personnel, the HMIS System Administrator will provide instructions via email (or phone) to Partner Agency.

All necessary customization will be done by the HMIS System Administrator.

# **Participation Termination**

# **Agency Termination**

The Partner Agency shall inform the HMIS Manager, and the HMIS System Administrator in writing of their intention to terminate an HMIS participation agreement. The HMIS System Administrator will then inactivate all users from that agency at the appropriate time.

In the unlikely event that a Partner Agency is found to be in violation of the terms of the HMIS, the Partner Agency and the County of San Luis Obispo will work to resolve the conflict(s). If the County of San Luis Obispo is unable to resolve the conflict(s), the Partner Agency will be notified in writing of the intention to terminate that Partner Agencies participation in the HMIS. The System Administrator will then inactivate all users from that agency.

All Partner Agency-specific information contained in the HMIS system will remain in the HMIS system. The agency will be responsible for any cost of obtaining hard copy or digital copy of HMIS information.

# **User Termination**

If there is a suspected breach in security, especially client confidentiality, the County of San Luis Obispo reserves the right to suspend the user's account or the entire agency's user's accounts, if the problem is agency wide, until the County of San Luis Obispo is convinced that the client information is secure

# CHANGES TO THE POLICIES AND PROCEDURES DOCUMENT

# Revisions

The County of San Luis Obispo will guide the compilation and amendment to this and other documents.

### Distribution

A copy of the revised Policies and Procedures document will be distributed to the partner agencies. Partner Agencies will be asked to sign a receipt acknowledging they have received the revised Policies and Procedures. It is the agencies responsibility to make sure everyone participating in the HMIS has access to a copy of the document, reads it, understands it, and agrees to comply with it. If anyone participating in the HMIS has issue with any revision, they may contact the County of San Luis Obispo and voice their concern. They must, however, comply with the revisions or stop using the system until the issue is resolved.

# Funding

The San Luis Obispo County's current HUD grant for HMIS provides support for an HMIS System. Therefore, it is committed to provide services to HUD funded programs in San Luis Obispo County. The current HUD grant for HMIS provides for a limited number of user licenses. While it may not be possible to meet every agency's full requirements for licenses within the HUD grant, the County of San Luis Obispo will endeavor to ensure that every agency participating will have their minimum requirements met from the HUD grant. The County of San Luis Obispo will decide funding responsibilities for additional licenses as the needs arise.

Agencies applying for new grants should incorporate licensing fees into their budgets.

# **HUD HMIS Data and Technical Standards**

This document should, at a minimum, reflect the baseline requirements listed in the most current HMIS Data and Technical Standards Final Notice. Users of HMIS are required to read and comply with the current HMIS Data and Technical Standards. Failure to comply with these standards carries the same consequences, as does failure to comply with these Policies and Procedures.

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In any instance where these Policies and Procedures are not consistent with the current HMIS Standards from HUD, the HUD Standards take precedence. Should any inconsistencies be identified, notice should be made to the County of San Luis Obispo.

For agencies or programs where HIPAA applies, HIPAA requirements take precedence over both the HUD HMIS Data Requirements and these policies and procedures.

# 6. GLOSSARY OF TERMS

**Bell Data:** The HMIS vendor that is currently used by San Luis Obispo County.

Client: Any person who is, has been, or will be entered into HMIS.

CoC: Continuum of Care

**End User or User**: Any person given access to the database for entering or updating data.

HIPAA: Health Insurance Portability and Accountability Act

HMIS: Homeless Management Information System

HSOC: Homeless Services Oversight Council

HUD: U.S. Department of Housing and Urban Development

# EXHIBIT A:

# County of San Luis Obispo Homeless Management Information System AGENCY PARTICIPATION AGREEMENT

#### AGENCY NAME: \_\_\_\_\_

For purpose of this agreement, the participating Homeless Service Provider will be referred to as "Participating Agency," the consumer of services as the "Client," and the County of San Luis Obispo Homeless Management Information System as "SLO County-HMIS" or "HMIS." Bell Data is a web-based client information system used to record and track homeless client information. It will be used for tracking client service patterns, sharing of information on services provided to homeless clients, and systems planning.

#### I. HMIS Use and Data Entry

A. The Participating Agency shall follow, comply with, and enforce the HMIS Policies and Procedures. Additionally, Client Consent forms shall be used and may be modified as needed for the purpose of smooth and efficient operation,

1. All Participating Agency users of the SLO County-HMIS are required to have had training by the HMIS or its Agency Administrator in using the HMIS database before they will be allowed to use it. Users must demonstrate proficiency in that use before being given permission to use the HMIS system.

2. The Participating Agency shall only enter individuals in the HMIS database that exist as Clients in the Participating Agency's jurisdiction. The Participating Agency shall not misrepresent its Client base in the HMIS by entering known, inaccurate information.

3. The Participating Agency shall use Client information in the HMIS database, as provided to the Participating Agency, to assist the Participating Agency in providing adequate and appropriate services to the Client.

4. The Participating Agency shall consistently enter information into the HMIS database and will strive for real-time, or close to real-time (data entry within 14 days of client services) data entry.

B. The Participating Agency will not alter information in the HMIS database entered by another Participating Agency with known, inaccurate information.

C. The Participating Agency shall not give or share assigned User ID's or passwords for the HMIS database with any other agency, business, or individual.

D. If this agreement is terminated, SLO County-HMIS will provide the Participating Agency with a copy of their client data. Copies will be in both digital and hardcopy form.

#### **II. Training and Technical Assistance**

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A. SLO County-HMIS shall assure the provision of training for the necessary Participating Agency staff in the use of HMS. In addition training updates will be provided as necessary and reasonable for staff and for changes in the software. Agencies may train new staff or ask for training from SLO County-HMIS.

B. SLO County-HMIS will be available for continuing technical support as related to the HMIS system within budgetary constraints.

C. SLO County-HMIS will maintain the contract with Bell Data to operate and maintain the network servers, software, data lines, and any other network or communication devices at the host site which is necessary for the proper function of the HMIS system. Each Participating Agency shall provide and maintain its own connection to the internet.

#### III. Confidentiality

A. The Participating Agency shall uphold all applicable federal and state confidentiality regulations and laws that protect Client records and the Participating Agency shall only release client records with written Consent for Release of Information by the client or when required by law.

1. The Participating Agency shall provide a verbal explanation of the HMIS database and the terms of the Consent for Release of Information forms and shall arrange for a qualified interpreter in the event that an individual is not literate in English or has difficulty understanding the consent form.

2 The Participating Agency shall not solicit or input information from Clients into the HMIS database unless it is essential to provide services or conduct evaluation or research.

3 The Participating Agency shall ensure that all staff, volunteers, and other persons issued a HMIS User ID and password receive client confidentially training.

B. The Participating Agency may receive access to Client Data entered by other Participating Agencies. All Participating Agencies are bound by restrictions placed upon the data by the client of any other Participating Agency.

C. The Participating Agency shall keep signed copies of the Consent for Release of Information form for HMIS for a period of at least three years. If a Client withdraws Consent for Release of Information, the Participating Agency remains responsible to ensure that Client's information is unavailable to all other Partner Participating Agencies.

D. This agreement does not require or imply that services must be contingent upon a Client's participation in the HMIS database. Services should be provided to Clients regardless of HMIS participation provided the Clients would otherwise be eligible for the services.

#### IV. Use of Data

A. The Participating Agency may make aggregate data available to other entities for funding or planning purposes pertaining to providing services to homeless persons. However, such aggregate data shall not directly identify individual Clients.

B. If this agreement is terminated, the SLO County HMIS and remaining Participating Agencies shall maintain their right to the use of all Client data previously entered by the terminating Participating Agency; this use is subject to any restrictions requested by the Client.

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C. SLO County-HMIS will use only unidentified, aggregate HMIS data for homeless policy and planning decisions, in preparing federal, state, or local applications for homelessness funding, to demonstrate the need for and effectiveness of programs, and to obtain a system-wide view of program utilization in the state.

### V. Terms and Conditions

A. The SLO County-HMIS shall not be liable to any member Participating Agency for any cessation, delay, or interruption of services, nor for any malfunction of hardware, software, or equipment to the extent that any such event is beyond the reasonable control of the HMIS.

B. This agreement shall be in-force until revoked in writing by either party provided funding is available.

#### **VI. Participating Agencies**

The Participating Agency agrees to share the demographic data they enter into the HMIS system with the listed agencies unless the client specifically refuses to give consent for such sharing to one or all the listed agencies.

**Participating Agencies** 

- 1. CAPSLO
- 2. ECHO
- 3. Transitions Mental Health Association
- 4. The Link
- 5. Five Cities/Good Samaritan
- 6. Department of Social Services

AGENCY \_\_\_\_\_

SIGNATURE

DATE

# EXHIBIT B:

# San Luis Obispo County HMIS User Agreement

#### Agency Name: \_\_\_\_

User Name: \_\_\_\_\_

The County of San Luis Obispo recognizes the privacy of client needs in the design and management of the San Luis Obispo County HMIS. These needs include both the need continually to improve the quality of homeless and housing services with the goal of eliminating homelessness in San Luis Obispo County, and the need vigilantly to maintain client confidentiality, treating the personal data of our most vulnerable populations with respect and care.

As the guardians entrusted with this personal data, San Luis Obispo County HMIS users have a moral and a legal obligation to ensure that the data they collect is being collected, accessed and used appropriately. It is also the responsibility of each user to ensure that client data is only used to the ends to which it was collected, ends that have been made explicit to clients and are consistent with the mission of the County of San Luis Obispo to assist families and individuals in the County to resolve their housing crisis. Proper user training, adherence to the San Luis Obispo County HMIS Policies and Procedures Manual, and a clear understanding of client confidentiality are vital to achieving these goals.

Relevant points regarding client confidentiality include:

- A client consent form must be signed by each client whose data is to be entered into the San Luis Obispo County HMIS
- Client consent may be revoked by that client at any time through a written notice
- No client may be denied services for failure to provide consent for HMIS data collection
- Clients have a right to inspect, copy and request changes in their HMIS records
- San Luis Obispo County HMIS Users may not share client data with individuals or agencies that have not entered into an HMIS Agency Agreement with the County without obtaining written permission from that client
- San Luis Obispo County HMIS Users may not share client data with any Connecting Agency that is not specified in their agency's HMIS Agency Agreement without obtaining written permission from the client
- San Luis Obispo County HMIS Users will maintain HMIS data in such a way as to protect against revealing the identity of clients to unauthorized agencies, individuals or entities
- Any San Luis Obispo County HMIS User found to be in violation of the San Luis Obispo County HMIS Policies and Procedures, or the points of client confidentiality in this User Agreement, may be denied access to the San Luis Obispo County HMIS
- While accessing the HMIS system all San Luis Obispo County HMIS users must position their screen so that no other person can see the screen (not even another authorized user)
- San Luis Obispo County HMIS users will lock their workstation if they must step away from it and log out of the HMIS system if they must leave the work area.

#### I affirm the following:

- 1) I have received training in how to use the San Luis Obispo County HMIS and have proven competency in using the program
- 2) I have read and will abide by all policies and procedures in the San Luis Obispo County HMIS Policies and Procedures Manual

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- 3) I will maintain the confidentiality of client data in the San Luis Obispo County HMIS as outlined above and in the San Luis Obispo County HMIS Policies and Procedures Manual
- 4) I will only collect, enter and extract data in the San Luis Obispo County HMIS relevant to the delivery of services to people in housing crisis in San Luis Obispo County
- 5) I understand that my username and password are for my use only and must not be shared with anyone. I must take all reasonable means to keep my password physically secure.
- 6) I understand that if I notice or suspect a security breach within the HMIS, I must immediately notify my HMIS Agency Administrator and HMIS System Administrator.
- 7) If I am logged into the HMIS system I will make sure my screen is not visible to any other person and if I must leave the work area where the computer is located; I must log-off of the HMIS software before leaving the work area. Failure to do so may result in a breach in client confidentiality and system security.

I agree to maintain strict confidentiality of information obtained through the County HMIS. This information will be used only for the legitimate client service and administration of the above named agency. Any breach of confidentiality will result in immediate termination of participation in HMIS. The specifics of this agreement do not preclude additional agency rules and regulations.

#### I understand and agree to comply with all the statements listed above.

**User Signature** 

Date

#### EXHIBIT C:

#### CLIENT NOTICE AND CONSENT FOR RELEASE

#### [Insert Agency Name]

THIS CLIENT NOTICE AND CONSENT FOR RELEASE FORM DESCRIBES HOW INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY. IF YOU HAVE ANY QUESTIONS OR DESIRE ANY FURTHER INFORMATION REGARDING THIS FORM PLEASE CONTACT

\_\_\_\_\_ (insert client's name), understand and acknowledge that Ι, (the "Agency") is affiliated with the County of San Luis Obispo ("County"), and I consent to and authorize the collection of data and information and preparation of records pertaining to the services provided to me by the Agency and the release of such data and all records maintained by the Agency to the County and agencies affiliated with the County, provided such agency is a party to The San Luis Obispo County Homeless Management Information System ("HMIS") agency agreement with the County under which the Agency has specifically agreed to share information with such agency. The data, information and records gathered and prepared by the Agency and the County will be included in the HMIS database and shall be utilized by the County and its affiliated agencies, including Agency, to: (a) provide individual case management; (b) produce reports regarding utilization of services; (c) track individual program outcomes; (d) provide accountability for individuals and entities that provide funds for use in providing services in the County of San Luis Obispo area; (e) identify unfilled service needs and plan for the provision of new services; (f) allocate resources among agencies engaged in the provision of services in and around San Luis Obispo County; and (g) be used for all other purposes deemed appropriate by the County. I understand and acknowledge that my data and information may be aggregated with the data and information of other individuals served by the Agency and other County agencies for the purposes described above. I understand and acknowledge that that data, information and records pertaining to the services provided to me by the Agency will only be disclosed to agencies, individuals and entities other than the County and its affiliated agencies with my written authorization.

\_\_\_\_\_ (please initial) I understand and acknowledge that the data pertaining to the services provided to me by the Agency and the records maintained by the Agency may include medical/health information and other information the privacy of which may be protected by federal and or California law and expressly consent to the release of such information.

**(please initial)** I understand and acknowledge that I have the right to (a) inspect, copy, and request amendment of all records maintained by the Agency related to the provision of services to me and to receive a paper copy of this form; (b) request restriction of how my data, information and records are utilized and disclosed but that the Agency is not required to agree to such requested restrictions; (c) request that the Agency communicate with me about my services in a manner designed to promote confidential communications; and (d) complain to the Agency or the County by providing written notice of the alleged violation if I believe my privacy rights have been violated and that I will not be retaliated against for filing such a complaint.

(please initial) I understand and acknowledge that I have the right to opt out of having my data, information and records disclosed to the County and other County affiliated agencies by providing written notice to the Agency and that I am entitled to services regardless of my decision. I further understand and acknowledge that I may revoke this consent at any time by providing written notice to the Agency. However, I understand and acknowledge that regardless of my decision to opt out or revoke consent, my data may be disclosed to the County and included in the HMIS database in an aggregated and deidentified form for purposes of making future resource allocation decisions.

\_\_\_\_\_ (please initial) I understand and acknowledge that the Agency is required to abide by the terms of this notice but that the Agency reserves the right to change the terms of this notice and to make such revised or changed notice effective for information already held by the Agency as well as information received in the future.

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Signature:\_\_\_\_\_

Date:\_\_\_\_\_

# Chapter 4: ESTABLISHING PREFERENCES AND MAINTAINING THE INTEREST LIST

[24 CFR Part 5, Subpart D, F; 24 CFR 982.54(d)(1); 24 CFR 982.204 to 982.207]

### INTRODUCTION

It is HASLO's objective to ensure that families are placed in the proper order on the interest list and selected from the interest list for admissions in accordance with the policies in this Administrative Plan.

This chapter explains the preferences that HASLO has adopted to meet local housing needs, defines the eligibility criteria for the preferences and explains HASLO's system of applying them.

By maintaining an accurate interest list, HASLO will be able to perform the activities, which ensure that an adequate pool of qualified applicants will be available so that program funds are used in a timely manner.

### 4.A. LOTTERY POOL & INTEREST LIST

HUD requires HASLO to maintain a single wait list for the HCV program unless it serves more than one county or municipality. Such PHAs are permitted, but not required, to maintain a separate wait list for each county or municipality served.

#### **HASLO Policy**

HASLO will maintain separate wait lists for the different programs in the HCV program. The lottery system will be used for the Section 8 Housing Choice Voucher Program. Separate wait lists will be used for the Section 8 Housing Choice Voucher Project-Based Assistance (located at these properties: Madonna Road Apartments, Oak Park I, Chet Dotter Apartments, and Courtland Street Apartments, South Street Apartments, Oak Park 2 Apartments and any other projects awarded project-based vouchers through the procedures outlined in Chapter 22).

HUD requires that any applicants must be offered the opportunity to be placed on the wait list for any public housing, project-based voucher or moderate rehabilitation program HASLO operates if:

- 1. the other programs' wait lists are open, and
- 2. the family is qualified for the other programs.

HUD permits, but does not require, that PHAs maintain a single merged wait list for their public housing, Section 8, and other subsidized housing programs.

A family's decision to apply for, receive, or refuse other housing assistance must not affect the family's placement on the HCV wait list, or any preferences for which the family may qualify.

### HASLO Policy

HASLO will not merge the HCV wait list or lottery with the wait list for any other program HASLO operates.

HASLO uses a lottery and multiple interest lists for admission to its Section 8 Housing Choice Voucher program:

- Section 8 Tenant-Based Rental Assistance Interest List, created by random selection from a lottery pool. Applicants will be listed by local preference and then by lottery ranking number.
- Section 8 Tenant-Based Rental Assistance local preferences program with referrals by approved agencies, sorted by date and time of application.
- Section 8 Project-Based Rental Assistance programs may elect to have their own waiting list. Applicants will be listed by date and time of application. PBV Projects with individual interest lists are: Madonna Road Apartments, Chet Dotter Apartments, Oak Park I, Courtland Street Apartments, South Street Apartments, Oak Park 2 Apartments and any other projects awarded project-based vouchers through the process outlined in Chapter 22.

Except for Special Admissions, applicants will be selected from the HASLO interest list in accordance with policies and preferences and- income targeting requirements defined in this Administrative Plan.

In cases where two "regular" interest lists overlap due to the opening of the lottery pool, the existing interest list will be exhausted prior to applicants being drawn from any new list.

If HUD awards funding that is targeted for families with specific characteristics or families living in specific units, HASLO will use the assistance for those families.

HASLO utilizes a lottery pool for admissions to the Interest List for the Section 8 Tenant-Based Rental Assistance Program. The lottery pool will be opened every one to two years, depending on funding availability. When HASLO opens the Section 8 lottery process, HASLO will issue public notice that individuals or families may apply for the Housing Choice Voucher program. HASLO will issue the public notice by publication in local newspapers of general circulation, minority media and on its website. The notice will comply with the Equal Opportunity plan and with HUD Fair Housing Requirements.

After the lottery pool period closes, HASLO will conduct a random drawing from the lottery pool. HASLO will determine the number of applicants drawn based on anticipated need for the next 12 months. Applicants will be notified by mail of their acceptance or not into the lottery pool.

At the end of the drawing, the Section 8 lottery pool is purged and families who have not been selected are notified in writing that they are eligible to apply for the lottery pool next year.

The order of admission from the lottery pool will be based on local preference and then by random drawing or other random choice technique (lottery).

The lottery pool will contain the following information for each applicant:

- Applicant Name, Date of Birth, and Social Security Number (last 4 digits)
- Applicant's physical, mailing, email address, and phone number(s).
- Date and time of application
- Number of family members in the household
- Gross annual household income
- Racial or ethnic designation of the household
- Disabled household status
- Veteran status
- Other targeted program qualifications or local preferences

### **4.B. SPECIAL ADMISSIONS** [24 CFR 982.54(d)(3), 982.203]

If HUD awards a HASLO program funding that is targeted for specifically named families, HASLO will admit these families under a Special Admission procedure.

Special admissions families will be admitted outside of the regular interest list process. They do not have to qualify for any preferences, nor are they required to be on the program interest list. HASLO maintains separate records of these admissions.

The following are examples of types of program funding that may be designated by HUD for families living in a specified unit:

- A family displaced because of demolition or disposition of a public or Indian housing project;
- A family residing in a multifamily rental housing project when HUD sells, forecloses or demolishes the project;
- For housing covered by the Low Income Housing Preservation and Resident Homeownership Act of 1990;
- A family residing in a project covered by a project-based Section 8 HAP contract at or near the end of the HAP contract term; and
- A non-purchasing family residing in a HOPE 1 or HOPE 2 project.

Applicants, who are admitted under Special Admissions, rather than from the interest list, are identified by specific program codes in the computer system.

### 4.C. INTEREST LIST PREFERENCES [24 CFR 982.207]

A preference does not guarantee admission to the program. Preferences, and then random lottery selection are used to establish the order of placement on the interest list. Every applicant must meet HASLO's eligibility criteria as defined in this policy.

Families who reach the top of the interest list will be contacted by HASLO to verify their preference and, if verified, HASLO will complete a full application. Applicants must complete the application and continue through the application processing and may not retain their place on the interest list if they refuse to complete their processing when contacted by HASLO.

An applicant will not be granted any preference if any member of the family has been **evicted** from federally assisted housing in the last **five (5) years**. [24 CFR 982.552(c)(1)(ii)]

An applicant will not be granted any preference if any member of the family has been **evicted** from housing assisted under a 1937 Housing Act program during the past **three (3) years** from the date of eviction because of drug-related criminal activity. [24 CFR 982.553(a)(i)]

HASLO will grant an exception to such a family if:

- The responsible member has successfully completed a rehabilitation program.
- The evicted person clearly did not participate in or know about the drug-related activity.
- The evicted person no longer participates in any drug related criminal activity.

### 4.D. LOCAL PREFERENCES

HALSO employs the following system of local preferences in administering its interest list. The local preferences consist of:

- 1) Involuntarily Displaced
- 2) Veterans
- 3) Targeted Funding
- 4) Local Preference

HASLO will weigh each local preference equally. This is, an applicant that meets the federal definition of any or all of the local preferences will receive an equal priority.

#### 1. Involuntarily Displacement (Includes Victims of Domestic Violence)

Involuntarily displaced applicants are not living in housing that is decent, safe, or sanitary, permanent or replacement housing (or) adequate for the family size, and the family has vacated, or will be involuntarily displaced within no more than thirty (30) days from the date of preference status certification because of the following:

- A natural disaster that has caused the unit to be uninhabitable.

- Demolition or disposition of their residence as a result of Federal, state or local government action related to code enforcement.
- Residing in a multifamily rental housing project when the U.S. Department of Housing and Urban Development (HUD) sells, forecloses upon, or demolishes the project.
- Residing in a project covered by a profit-based Section 8 Housing Assistance Payment (HAP) contract at, or near the end of, the HAP contract term (Opt-Outs).
- Providing information on criminal activities to a law enforcement agency and, after a threat assessment and to avoid reprisals, the law enforcement agency recommends housing the family to reduce risk of violence to the family. HASLO will take reasonable precautions to assist the law enforcement agency in concealing the new location of the family in cases of witness protection.
- Displacement by non-suitability of the unit when a member of the family has mobility or other impairments that make the person unable to use a kitchen, sleeping area, full bathroom, the entry and egress of the unit and building.
- Being the victim of one or more hate crimes and vacating the home because of the crime or the fear of such a crime. A hate crime is actual or threatened, physical violence or intimidation that is directed against a person on his property and is based upon the person's race, color, religion, sex, national origin, disability, familial status, or sexual orientation, and is of a continuing nature.

Any admission mandated by court order related to desegregation or Fair Housing and Equal Opportunity will take precedence over the Preference System. Other admissions required by court order will also take precedence over the Preference System. If permitted by the court order, HASLO may offer the family a housing voucher.

### 2. <u>Veteran preference</u>

Honorably Discharged Veteran, Family of a Veteran, or Serviceperson.

- (a) Any citizen of the United States who was released from active military duty under honorable conditions.
- (b) A family that was headed by a Veteran, who is now deceased, is a "Family of a Veteran," provided the spouse has not remarried.
- (c) A family headed by an active-duty serviceperson is a "Family of a Serviceperson". "Active Serviceperson" shall mean an individual currently serving in a branch of the military forces, including a reservist or National Guardsman, to the United States of America and who has served at least 182 consecutive days.

### 3. <u>Targeted Funding</u> [24 CFR 982.204(e)]

HASLO uses some vouchers to assist families within specified categories, i.e. targeted funding. In order to assist families within a targeted funding category, HASLO may skip families that do not

qualify within the targeted funding category. Within this category of families, the order in which such families are assisted is determined according to the policies provided in this Administrative Plan.

#### HASLO Policy

HASLO administers the following types of targeted funding:

- 1. Veterans Affairs Supportive Housing (VASH)
- 2. Madonna Road Apartments project-based vouchers with services
- 3. Chet Dotter Apartments- project-based vouchers with services
- 4. Oak Park I project-based vouchers with services
- 5. Courtland Street Apartments- project-based vouchers with services
- 6. South Street Apartments- project-based vouchers
- 7. Oak Park 2 Apartments- project-based vouchers with services
- 8. Other properties as may be selected for project-based vouchers through the selection procedures as outlined in Chapter 21.

Housing Choice Voucher participants in these targeted funding programs must comply with the same family obligations as all HCV (Section 8) participants.

The number of vouchers may vary depending upon ACC re-configurations due to changes in family composition requiring different bedroom sizes. The HASLO local preference will be applied to those individuals who qualify pursuant to the definition of homeless (see glossary).

In accordance with PIH Notice 2013-15, the following targeted funding, local preferences are administered by HASLO. The targeted funding is offered after a Memorandum of Understanding (MOU) has been established between the local services' agency and HASLO. Targeted Funding Agencies are approved by the Board of Commissioners and may change from time-to-time, based on the needs of the homeless in the local community, the availability of other grant and fund programs to assist with those housing needs and the capacity for the service agency to provide case management services.

Commitment of these vouchers shall be contingent upon available funding and an adequate supply of available vouchers (may not exceed HASLO's authorized baseline for the HCV program). Families referred by these targeted funding program agencies must meet HASLO's eligibility requirements for the HCV program in order to receive assistance. Families referred for assistance will be required to complete an application for the HCV program. Eligible families will be placed on the HCV waiting list in date order and given a unique identification number that will allow HASLO to track each family's progression through the program. When HASLO's waiting list is closed, HASLO may continue to accept referrals from these approved targeted funding programs until the vouchers reserved for the calendar year have been utilized.

An applicant will not be granted a local preference if any member of the family has been evicted from housing assisted under a 1937 Housing Act Program during the past three years. If an applicant makes a false statement in order to qualify for a local preference, HASLO will deny the family admission to the program. A family who has been denied assistance or terminated

from the program due to a program violation may not apply for preference status for a period of three years from the date of denial or termination.

HCVs not utilized in a calendar year will not carry forward to the next calendar year.

# 1) Transitions Mental Health Association - 50Now Program

Transitions Mental Health Association was awarded a contract by the SLO County Board of Supervisors for three years to work with the 50 most vulnerable chronically homeless families in San Luis Obispo County. The goal is to identify chronic, vulnerable homeless individuals throughout the county and work with them to provide housing initially and then services such as drug and alcohol and mental health treatment.

In order to meet the housing needs of their clients, HASLO will provide a maximum of 50 vouchers to participants under case management through the 50Now program for this specific special need.

# 2) Access Support Network (Formerly AIDS Support Network) (ASN)

The Access Support Network (ASN) is the sole community based, non-profit organization in SLO County that provides supportive services to residents living with HIV disease and AIDS, their families and their friends. The program has expanded to offer support for community members living with Hepatitis C.

In order to meet the housing needs of their clients, HASLO will provide a maximum of 10 vouchers, at any given time, to participants under case management by ASN for this specific special need. The vouchers are allocated to residents living at the units owned and managed by ASN in San Luis Obispo.

# 3) Transitions Mental Health Association (T-MHA)

Transitions-Mental Health Association (T-MHA) is a nonprofit organization dedicated to eliminating stigma and inspiring hope, growth, recovery and wellness for people with mental illness. They operate 30 programs at over 35 locations in San Luis Obispo and North Santa Barbara counties. The emphasis of their innovative services is to teach vital independent living skills and help build a framework for community re-entry through personal empowerment and hands on experience. For over 30 years, T-MHA has been dedicated to providing work, housing, case management and life-skills support to teens and adults with mental illness while offering support, resources and education.

In order to meet the special needs of the clients of T-MHA, HASLO will provide a maximum of twenty (20) vouchers, at any given time, to participants under case management by T-MHA for this specific special need.

### 4) 5 Cities Homeless Coalition (5CHC)

The 5Cities Homeless Coalition (5CHC) is working to strengthen the south San Luis Obispo County community by mobilizing resources, support, and hope for the homeless and those facing poverty.

In order to meet the special needs of the homeless in the South County, HASLO will provide a maximum of 12 vouchers, at any given time, to participants under case management by 5CHC for this specific special need.

### 5) Community Action Partnership of San Luis Obispo County (CAPSLO)

Community Action Partnership of San Luis Obispo County (CAPSLO) is a non-profit agency that focuses on helping people and changing lives. The agency is committed to eliminating poverty by empowering individuals and families to achieve economic selfsufficiency and self-determination through a comprehensive array of community-based programs.

In order to meet the special needs of the homeless served by CAPSLO, HASLO will provide a maximum of 24 vouchers, at any given time, to participants under case management by CAPSLO for this specific special need.

### 6) El Camino Homeless Organization (ECHO)

El Camino Homeless Organization (ECHO) provides meal, shelter and support services to the homeless and hungry of northern San Luis Obispo County.

In order to meet the special needs of the homeless in the North County, HASLO will provide a maximum of 12 vouchers, at any given time, to participants under case management by ECHO for this specific special need.

7) RISE (previously known as North County Women's Shelter & Resource Center & SARP) RISE is a non-profit organization that provides crisis intervention and treatment services to survivors of sexual and intimate partner violence and their loved ones. All services are provided confidentially, at low or no cost, to anyone regardless of age, ethnicity, gender, sexual orientation, religion, or ability. All crisis services are available in Spanish and English.

In order to meet the special needs of the clients of RISE in the North County, HASLO will provide a maximum of four (4) vouchers, at any given time, to participants under case management by RISE for this specific special need.

#### 8) San Luis Obispo Women's Shelter Program (WSP)

The Women's Shelter Program (WSP) is committed to recognizing and responding to the community's need for comprehensive multicultural domestic violence and child abuse services. WSP understands that domestic violence and child abuse, in their fullest scope,

impact primary victims, family members, society, and future generations. With this in mind, it is their goal to stop the cycle of violence by providing crisis intervention, emergency shelter, advocacy, treatment, prevention and education.

In order to meet the special needs of the clients of WSP in the Central and Southern areas of the County, HASLO will provide a maximum of four (4) vouchers, at any given time, to participants under case management by WSP for this specific special need.

# 9) Low Income Public Housing (PH)

Public Housing tenants currently residing in HASLO's jurisdiction whose unit size HASLO has determined to have been inappropriate for the size and composition of the family for at least 90 days and who has not been offered a transfer to another unit due to unit unavailability. In order to meet the occupancy standards for these families, HASLO will provide a voucher as an alternative to waiting on the transfer list.

### 4. Local Preference

HASLO has adopted the following as a secondary local preference:

### **Residency preference:**

A family is considered a "resident" of the County of San Luis Obispo if they live and/or work in San Luis Obispo County <u>only</u> at the time of admission. The family must submit documentation that provides:

- a. A current address of residency (i.e. lease, utility bill in applicant's name).
- b. Verification of employment in San Luis Obispo County; or
- c. Sign a release to permit to HASLO to verity the address and employment.

### 4.E. FACTORS OTHER THAN LOCAL PREFERENCES THAT AFFECT SELECTION OF APPLICANTS

#### **Treatment of Single Applicants:**

All families with children, applicants of no more than two persons who are elderly (age 62 or older), displaced, homeless or a person with disabilities will be given a selection priority over all "Other Single" applicants regardless of their preference status.

"Other Singles" denotes a one-person household in which the individual member is neither elderly, disabled, homeless, or displaced by government action. Such applicants will be placed on the interest list in accordance with their preferences, but cannot be selected for assistance before any *one or two person* elderly, disabled or displaced family regardless of local preferences.

#### 4.F. INCOME TARGETING

In accordance with the Quality Housing and Work Responsibility Act of 1998, each fiscal year HASLO will reserve a minimum of seventy-five percent (75%) of its Section 8 new admissions for families whose income does not exceed 30 percent of the area median income. HUD refers to these families as "extremely low-income families." HASLO will admit families who qualify under the Extremely Low-Income limit to meet the income-targeting requirement, regardless of preference, or the lottery pool ranking.

The remainder of new admissions to the tenant-based Section 8 program will have incomes at or below 80% of the area median family income, in accordance with HUD guidelines which generally limit admission to families with incomes at or below 50% of the area median.

HASLO's income targeting requirement does not apply to low income families continuously assisted as provided for under the 1937 Housing Act.

### 4.G. PREFERENCE AND INCOME TARGETING ELIGIBILITY [24 CFR 5.410]

### Cross-Listing of Different Housing Programs and Section 8 [24 CFR 982.205(a)]

HASLO utilizes a system of cross-listing for public housing and Section 8 applicants:

(i) If the PHA's waiting list for tenant-based assistance is open when an applicant is placed on the waiting list for the PHA's Public Housing program, project-based voucher program or moderate rehabilitation program, the PHA must offer to place the applicant on its waiting list for tenant-based assistance.

(ii) If the PHA's waiting list for its Public Housing program, project-based voucher program (PBV) is open when an applicant is placed on the waiting list for its tenantbased program, and if the other program includes units suitable for the applicant, the PHA must offer to place the applicant on its waiting list for the other program.

#### Other Housing Assistance [24 CFR 982.205(b)]

Other housing assistance means a Federal, State or local housing subsidy, as determined by HUD, including public housing.

HASLO may not take any of the following actions because an applicant has applied for, received, or refused other housing: [24 CFR 982.205(b)]

- Refuse to list the applicant on HASLO interest list for tenant-based assistance;
- Deny any admission preference for which the applicant is currently qualified;
- Change the applicant's place on the interest list based on preference, lottery number, or other factors affecting selection under HASLO selection policy; or
- Remove the applicant from the interest list.

### 4.H. ORDER OF SELECTION [24 CFR 982.207(e)]

HASLO's method for selecting applicants from a preference category leaves a clear audit trail that can be used to verify that each applicant has been selected in accordance with the method specified in the administrative plan.

HASLO system of preferences may select families based on local preferences according to the date and time of application, or by a random selection process [24 CFR 982.207(c)]. If a PHA does not have enough funding to assist the family at the top of the waiting list, it is not permitted to skip down the wait list or through the lottery pool to a family that it can afford to subsidize when there are not sufficient funds to subsidize the family at the top of the wait list or next in the lottery pool [24 CFR 982.204(d) and (e)].

#### HASLO Policy

Families will be selected from the wait list or the lottery pool based on the targeted funding or selection preference(s) for which they qualify, and in accordance with HASLO's hierarchy of preferences, if applicable.

Within each targeted funding or preference category, families will be randomly selected from the lottery pool. Families with a preference of 1 will be placed in the lottery pool over all other applicants.

Within each targeted funding or preference category, families will be selected from the wait list on a first-come, first-served basis according to the date and time their complete application is received by HASLO. Documentation will be maintained by HASLO as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the wait list is not qualified or not interested in targeted funding, there will be a notation maintained so that HASLO does not have to ask higher placed families each time targeted selections are made.

#### 4.I. FINAL VERIFICATION OF PREFERENCES [24 CFR 5.415]

Preference information on applications will be updated as applicants are selected from the interest list or if HASLO feels the family's circumstances have changed. At that time, HASLO will obtain necessary verifications of preference at the interview and by third party verification.

If an applicant or Service Agency (on behalf of the applicant) falsifies documents or makes false statements in order to qualify for any preference, they will be removed from the interest list.

Applicants will not be allowed to self-certify their preference points.

#### 4.J. REMOVAL FROM INTEREST LIST AND PURGING [24 CFR 982.204(c)]

Applicants are notified with confirmation of HASLO's receipt of their application that they are responsible for notifying HASLO within 10 calendar days, if they have a change of address.

The interest list will be purged periodically by e-mail or by US Postal Service to all applicants to ensure that the interest list is current and accurate. The mailing will ask for confirmation of continued interest.

Any mailings to the applicant which require a response will state that failure to respond within 14 calendar days will result in the applicant's name being removed from the interest list.

If a letter is returned by the US Postal Service without a forwarding address, the applicant will be removed without further notice and the envelope and letter will be maintained in the file. If a letter is returned with a forwarding address, it will be re-mailed to the address indicated.

If the applicant is removed from the interest list for failure to respond, they will not be entitled to reinstatement unless a person with a disability requests a reasonable accommodation for being unable to reply within the prescribed period. HASLO will reinstate the applicant in the family's former position on the interest list.

If an applicant is removed from the interest list for failure to respond they will not be entitled to reinstatement unless the Director of Housing Management or the Executive Director determines there were circumstances beyond the person's control. The following exception, if determined to exist, will be acceptable to warrant reinstatement: medical reasons - including confinement to a hospital with proper verification from a physician or the medical facility.

### Summary Report for CA-614 - San Luis Obispo County CoC

For each measure enter results in each table from the System Performance Measures report generated out of your CoCs HMIS System. There are seven performance measures. Each measure may have one or more "metrics" used to measure the system performance. Click through each tab above to enter FY2016 data for each measure and associated metrics.

RESUBMITTING FY2015 DATA: If you provided revised FY 2015 data, the original FY2015 submissions will be displayed for reference on each of the following screens, but will not be retained for analysis or review by HUD.

ERRORS AND WARNINGS: If data are uploaded that creates selected fatal errors, the HDX will prevent the CoC from submitting the System Performance Measures report. The CoC will need to review and correct the original HMIS data and generate a new HMIS report for submission.

Some validation checks will result in warnings that require explanation, but will not prevent submission. Users should enter a note of explanation for each validation warning received. To enter a note of explanation, move the cursor over the data entry field and click on the note box. Enter a note of explanation and "save" before closing.

### Measure 1: Length of Time Persons Remain Homeless

This measures the number of clients active in the report date range across ES, SH (Metric 1.1) and then ES, SH and TH (Metric 1.2) along with their average and median length of time homeless. This includes time homeless during the report date range as well as prior to the report start date, going back no further than October, 1, 2012.

*Metric 1.1: Change in the average and median length of time persons are homeless in ES and SH projects. Metric 1.2: Change in the average and median length of time persons are homeless in ES, SH, and TH projects.* 

a. This measure is of the client's entry, exit, and bed night dates strictly as entered in the HMIS system.

	Universe (Persons)			Average LOT Homeless (bed nights)			S		Median LOT (bed n		
	Submitted FY2015	Revised FY2015	Current FY	Submitted FY2015	Revised FY2015	Current FY	Difference	Submitted FY2015	Revised FY2015	Current FY	Difference
1.1 Persons in ES and SH	947	947	876	110	109	117	8	46	45	48	3
1.2 Persons in ES, SH, and TH	1002	1002	931	123	122	138	16	51	51	58	7

b.

This measure includes data from each client's "Length of Time on Street, in an Emergency Shelter, or Safe Haven" (Data Standards element 3.17) response and prepends this answer to the client's entry date effectively extending the client's entry date backward in time. This "adjusted entry date" is then used in the calculations just as if it were the client's actual entry date.

NOTE: Due to the data collection period for this year's submission, the calculations for this metric are based on the data element 3.17 that was active in HMIS from 10/1/2015 to 9/30/2016. This measure and the calculation in the SPM specifications will be updated to reflect data element 3.917 in time for next year's submission.

	Universe (Persons)			Average LOT Homeless (bed nights)			Median LOT Homeless (bed nights)		
	Previous FY	Current FY	Previous FY	Current FY	Difference	Previous FY	Current FY	Difference	
1.1 Persons in ES and SH	-	924	-	276		-	101		
1.2 Persons in ES, SH, and TH	-	988	-	303		-	101		

# Measure 2: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.

	Exited to a Housing D	Persons who a Permanent Destination (2 s Prior)	Returns to	) Homelessn han 6 Montl			Returns to Homelessness from 6 to 12 Months		Returns to Homelessness from 13 to 24 Months			of Returns Years	
	Revised FY2015	# of Returns	Revised FY2015	# of Returns	% of Returns	Revised FY2015	# of Returns	% of Returns	Revised FY2015	# of Returns	% of Returns	# of Returns	% of Returns
Exit was from SO	0	0	0	0		0	0		0	0		0	
Exit was from ES	55	77	3	4	5%	2	5	6%	4	2	3%	11	14%
Exit was from TH	20	22	1	1	5%	0	0	0%	1	0	0%	1	5%
Exit was from SH	0	0	0	0		0	0		0	0		0	
Exit was from PH	5	69	1	0	0%	0	0	0%	0	6	9%	6	9%
TOTAL Returns to Homelessness	80	168	5	5	3%	2	5	3%	5	8	5%	18	11%

#### **Measure 3: Number of Homeless Persons**

Metric 3.1 – Change in PIT Counts

This measures the change in PIT counts of sheltered and unsheltered homeless person as reported on the PIT (not from HMIS).

	2015 PIT Count	Most Recent PIT Count	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	1515	1368	-147
Emergency Shelter Total	337	145	-192
Safe Haven Total	0	0	0
Transitional Housing Total	55	100	45
Total Sheltered Count	392	245	-147
Unsheltered Count	1123	1123	0

#### Metric 3.2 – Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Unduplicated Total sheltered homeless persons	1124	1124	1050	-74
Emergency Shelter Total	1071	1071	986	-85
Safe Haven Total	0	0	0	0
Transitional Housing Total	58	58	77	19

## Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

Metric 4.1 – Change in earned income for adult system stayers during the reporting period

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Number of adults (system stayers)	44	44	38	-6
Number of adults with increased earned income	2	2	0	-2
Percentage of adults who increased earned income	5%	5%	0%	-5%

Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Number of adults (system stayers)	44	44	38	-6
Number of adults with increased non-employment cash income	8	9	4	-5
Percentage of adults who increased non-employment cash income	18%	20%	11%	-9%

#### Metric 4.3 – Change in total income for adult system stayers during the reporting period

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Number of adults (system stayers)	44	44	38	-6
Number of adults with increased total income	10	11	4	-7
Percentage of adults who increased total income	23%	25%	11%	-14%

#### Metric 4.4 – Change in earned income for adult system leavers

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Number of adults who exited (system leavers)	30	30	23	-7
Number of adults who exited with increased earned income	1	1	3	2
Percentage of adults who increased earned income	3%	3%	13%	10%

#### Metric 4.5 – Change in non-employment cash income for adult system leavers

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Number of adults who exited (system leavers)	30	30	23	-7
Number of adults who exited with increased non-employment cash income	15	15	5	-10
Percentage of adults who increased non-employment cash income	50%	50%	22%	-28%

#### Metric 4.6 - Change in total income for adult system leavers

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Number of adults who exited (system leavers)	30	30	23	-7
Number of adults who exited with increased total income	16	16	7	-9
Percentage of adults who increased total income	53%	53%	30%	-23%

## Measure 5: Number of persons who become homeless for the 1st time

Metric 5.1 - Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS

	Submitted FY 2015	Revised FY2015	Current FY	Difference
Universe: Person with entries into ES, SH or TH during the reporting period.	917	917	851	-66
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	148	152	146	-6
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)	769	765	705	-60

Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

	Submitted FY 2015	Revised FY2015	Current FY	Difference
Universe: Person with entries into ES, SH, TH or PH during the reporting period.	1441	1529	1367	-162
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	198	200	213	13
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)	1243	1329	1154	-175

Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD's Homeless Definition in CoC Program-funded Projects

This Measure is not applicable to CoCs in the FY2016 Resubmission reporting period.

# Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing

	Submitted FY 2015	Revised FY2015	Current FY	Difference
Universe: Persons who exit Street Outreach	0	0	17	17
Of persons above, those who exited to temporary & some institutional destinations	0	0	5	5
Of the persons above, those who exited to permanent housing destinations	0	0	8	8
% Successful exits			76%	

Metric 7b.1 – Change in exits to permanent housing destinations

	Submitted FY 2015	Revised FY2015	Current FY	Difference
Universe: Persons in ES, SH, TH and PH-RRH who exited	860	840	846	6
Of the persons above, those who exited to permanent housing destinations	113	110	150	40
% Successful exits	13%	13%	18%	5%

#### Metric 7b.2 – Change in exit to or retention of permanent housing

	Submitted FY 2015	Revised FY2015	Current FY	Difference
Universe: Persons in all PH projects except PH-RRH	91	91	96	5
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	78	78	86	8
% Successful exits/retention	86%	86%	90%	4%

## FY2016 - SysPM Data Quality

## CA-614 - San Luis Obispo County CoC

This is a new tab for FY 2016 submissions only. Submission must be performed manually (data cannot be uploaded). Data coverage and quality will allow HUD to better interpret your Sys PM submissions.

Your bed coverage data has been imported from the HIC module. The remainder of the data quality points should be pulled from data quality reports made available by your vendor according to the specifications provided in the HMIS Standard Reporting Terminology Glossary. You may need to run multiple reports into order to get data for each combination of year and project type.

You may enter a note about any field if you wish to provide an explanation about your data quality results. This is not required.

	All ES, SH			All TH				All PSH, OPH				All RRH				All Street Outreach				
	2012- 2013	2013- 2014	2014- 2015	2015- 2016	2012- 2013	2013- 2014	2014- 2015	2015- 2016												
1. Number of non- DV Beds on HIC	108	102	305	108	37	37	24	64	132	147	214	222		28	35	74				
2. Number of HMIS Beds	82	81	98	100	33	33	20	60	32	32	54	44		0	9	74				
3. HMIS Participation Rate from HIC ( % )	75.93	79.41	32.13	92.59	89.19	89.19	83.33	93.75	24.24	21.77	25.23	19.82		0.00	25.71	100.00				
4. Unduplicated Persons Served (HMIS)	1046	1069	1043	938	58	63	58	77	42	35	91	96	32	125	678	727	0	0	0	0
5. Total Leavers (HMIS)	862	889	864	777	26	30	26	17	10	5	23	20	4	70	110	152	0	0	0	0
6. Destination of Don't Know, Refused, or Missing (HMIS)	738	714	733	660	0	0	0	1	0	0	0	0	0	0	33	22	0	0	0	0
7. Destination Error Rate (%)	85.61	80.31	84.84	84.94	0.00	0.00	0.00	5.88	0.00	0.00	0.00	0.00	0.00	0.00	30.00	14.47				

# FY2016 - SysPM Data Quality