### **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:
   Reviewing the FY 2016 CoC Program Competition NOFA in its entirety for specific application and program requirements.
- Using the CoC Application Detailed Instructions while completing the application in e-snaps.
- Answering all questions in the CoC application. It is the responsibility of the Collaborative Applicant to ensure that all imported and new responses in all parts of the application are fully reviewed and completed. When doing this keep in mind:
- This year, CoCs will see that a few responses have been imported from the FY 2015 CoC Application.
- For some of the questions HUD has provided documents to assist Collaborative Applicants in completing responses.
- For other questions, the Collaborative Applicant must be aware of responses provided by project applications in their Project Applications.
  - Some questions require the Collaborative Applicant to attach a document to receive credit.
- This will be identified in the question.
- 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 form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**1A-1. CoC Name and Number:** CA-521 - Davis, Woodland/Yolo County CoC

**1A-2. Collaborative Applicant Name:** Yolo Community Care Continuum

1A-3. CoC Designation: CA

**1A-4. HMIS Lead:** Yolo Community Care Continuum

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

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1B-1. From the list below, select those organizations and persons that participate in CoC meetings.

Then select "Yes" or "No" to indicate if CoC meeting participants are voting members or if they sit on the CoC Board.

Only select "Not Applicable" if the organization or person does not exist in the CoC's geographic area.

Organization/Person Categories	Participates in CoC Meetings	Votes, including electing CoC Board	Sits on CoC Board
Local Government Staff/Officials	Yes	Yes	Yes
CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes	Yes
Law Enforcement	Yes	Yes	Yes
Local Jail(s)	Yes	Yes	Yes
Hospital(s)	No	No	No
EMT/Crisis Response Team(s)	Yes	Yes	Yes
Mental Health Service Organizations	Yes	Yes	Yes
Substance Abuse Service Organizations	Yes	Yes	Yes
Affordable Housing Developer(s)	Yes	Yes	Yes
Public Housing Authorities	Yes	Yes	Yes
CoC Funded Youth Homeless Organizations	Not Applicable		Not Applicable
Non-CoC Funded Youth Homeless Organizations	Yes	Yes	Yes
School Administrators/Homeless Liaisons	Yes	Yes	Yes
CoC Funded Victim Service Providers	Not Applicable		Not Applicable
Non-CoC Funded Victim Service Providers	Yes	Yes	Yes
Street Outreach Team(s)	Yes	Yes	Yes
Youth advocates	Yes	Yes	Yes
Agencies that serve survivors of human trafficking	Yes	Yes	Yes
Other homeless subpopulation advocates	Yes	Yes	Yes
Homeless or Formerly Homeless Persons	Yes	Yes	Yes
Legal Services Organizations	Yes	Yes	Yes
Homeless Veterans Organizations	Yes	Yes	Yes
Healthcare Providers	Yes	Yes	Yes

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

- 1			
	FY2016 CoC Application	Page 3	09/07/2016

1B-1a. Describe in detail how the CoC solicits and considers the full range of opinions from individuals or organizations with knowledge of homelessness or an interest in preventing and ending homelessness in the geographic area. Please provide two examples of organizations or individuals from the list in 1B-1 to answer this question.

A wide range of individuals and organizations participate in the Yolo CoC. The group recruits new members year-round and engages new members that will fill any knowledge gaps. Two examples of include:

- 1. Law enforcement agencies (LEAs) have become an important part of the Yolo CoC's outreach strategy, which is crucial to the local coordinated entry system. In 2016 the CoC worked to expand its relationship with each of the LEAs, including asking them to identify a primary point of contact on homeless issues, and participate in CoC meetings (2 of 5 LEAs now send reps to CoC meetings).
- 2. There are no dedicated providers of homeless youth services outside the school districts in Yolo. However, the community does have organizations that provide general youth services. These providers participate in CoC meetings and provide expertise on issues facing youth. These providers also form a homeless youth count subcommittee to better identify and survey homeless youth during the count.

1B-1b. List Runaway and Homeless Youth (RHY)-funded and other youth homeless assistance providers (CoC Program and non-CoC Program funded) who operate within the CoC's geographic area.

Then select "Yes" or "No" to indicate if each provider is a voting member or sits on the CoC Board.

Youth Service Provider (up to 10)	RHY Funded?	Participated as a Voting Member in at least two CoC Meetings between July 1, 2015 and June 20, 2016.	Sat on CoC Board as active member or official at any point between July 1, 2015 and June 20, 2016.
Yolo County Children's Alliance	No	Yes	Yes
RISE, Inc.	No	Yes	Yes
Center for Families dba Empower Yolo	No	Yes	Yes
Yolo County Health and Human Services Agency	No	Yes	Yes
Yolo County Office of Education	No	Yes	Yes
Turning Point Community Programs	No	Yes	Yes

F12016 COC Application   Page 4   09/07/2016		FY2016 CoC Application	Page 4	09/07/2016
--	--	------------------------	--------	------------

# 1B-1c. List the victim service providers (CoC Program and non-CoC Program funded) who operate within the CoC's geographic area. Then select "Yes" or "No" to indicate if each provider is a voting member or sits on the CoC Board.

Victim Service Provider for Survivors of Domestic Violence (up to 10)	Participated as a Voting Member in at least two CoC Meetings between July 1, 2015 and June 30, 2016	Sat on CoC Board as active member or official at any point between July 1, 2015 and June 30, 2016.
Empower Yolo	Yes	Yes

# 1B-2. Explain how the CoC is open to proposals from entities that have not previously received funds in prior CoC Program competitions, even if the CoC is not applying for new projects in 2016. (limit 1000 characters)

Notice of the CoC Competition is shared with the public in several ways to ensure that potential applicants (including current and new) are aware. The Notice is posted on the County website, and sent to the CoC's full homeless provider email list, as well as several other provider email lists maintained by the County.

The CoC requires that all project applications be submitted 30 days before the full application is due to HUD. An objective ranking panel (with non-conflicted CoC members) scores each project based on program design, performance and grant management. The process uses comparable scoring criteria for renewal and new projects. If a renewal project is underperforming or unaligned with HUD and local priorities (as evidenced by a low score), the project is recommended for reallocation. Next, the CoC determines the amount of funding available for new projects (amount reallocated + bonus), and selects top scoring new project proposals until the funds run out.

# 1B-3. How often does the CoC invite new Monthly members to join the CoC through a publicly

FY2016 CoC Application Page 5 09/07/2016
--

#### available invitation?

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

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1C-1. Does the CoC coordinate with Federal, State, Local, private and other entities serving homeless individuals and families and those at risk of homelessness in the planning, operation and funding of projects? Only select "Not Applicable" if the funding source does not exist within the CoC's geographic area.

Funding or Program Source	Coordinates with Planning, Operation and Funding of Projects
Housing Opportunities for Persons with AIDS (HOPWA)	Not Applicable
Temporary Assistance for Needy Families (TANF)	Yes
Runaway and Homeless Youth (RHY)	Not Applicable
Head Start Program	Yes
Housing and service programs funded through Federal, State and local government resources.	Yes

1C-2. The McKinney-Vento Act, requires CoC's to participate in the Consolidated Plan(s) (Con Plan(s)) for the geographic area served by the CoC. The CoC Program Interim rule at 24 CFR 578.7 (c) (4) requires the CoC to provide information required to complete the Con Plan(s) within the CoC's geographic area, and 24 CFR 91.100(a)(2)(i) and 24 CFR 91.110 (b)(2) requires the State and local Con Plan jurisdiction(s) consult with the CoC. The following chart asks for the information about CoC and Con Plan jurisdiction coordination, as well as CoC and ESG recipient coordination.

CoCs can use the CoCs and Consolidated Plan Jurisdiction Crosswalk to assist in answering this question.

	Number
Number of Con Plan jurisdictions with whom the CoC geography overlaps	3
How many Con Plan jurisdictions did the CoC participate with in their Con Plan development process?	3
How many Con Plan jurisdictions did the CoC provide with Con Plan jurisdiction level PIT data?	3
How many of the Con Plan jurisdictions are also ESG recipients?	1
How many ESG recipients did the CoC participate with to make ESG funding decisions?	1
How many ESG recipients did the CoC consult with in the development of ESG performance standards and evaluation process for ESG funded activities?	1

FV204C CoC Application	Do 20 7	00/07/0040
FY2016 CoC Application	Page /	09/07/2016

1C-2a. Based on the responses provided in 1C-2, describe in greater detail how the CoC participates with the Consolidated Plan jurisdiction(s) located in the CoC's geographic area and include the frequency and type of interactions between the CoC and the Consolidated Plan jurisdiction(s). (limit 1000 characters)

There are 3 Consolidated Plan jurisdictions within the Yolo CoC including the City of Davis, City of Woodland and State of California. The CoC collaborates with all 3 jurisdictions.

Davis and Woodland are active members of the CoC with regular participation in the monthly CoC meetings (1.5 hours/month) and the quarterly 10-Year Plan to End Homelessness meetings (1 hour/quarter). Both jurisdictions maintain involvement in CoC sub-committees and regularly engage in discussions with homeless providers regarding Yolo's progress towards ending homelessness. Additionally, members of the CoC are engaged in and provide feedback during the development of Con-Plans in both jurisdictions.

The CoC also maintains a relationship with the State by attending quarterly homeless roundtable meetings (6.5 hours/quarter) alongside State reps to discuss statewide issues. The CoC provides feedback during the State Con-Plan development process and maintains engagement on other issues as appropriate.

1C-2b. Based on the response in 1C-2, describe how the CoC is working with ESG recipients to determine local ESG funding decisions and how the CoC assists in the development of performance standards and evaluation of outcomes for ESG-funded activities. (limit 1000 characters)

The State of California is the only ESG recipient within the Yolo CoC's geographic area. The CoC maintains a relationship with the State by attending quarterly homeless roundtable meetings alongside State representatives to discuss statewide funding issues. The CoC also provides feedback during the State Con-Plan development process, including providing PIT and HMIS data as requested. When appropriate, the CoC provides feedback regarding the State's design for the ESG competition, including the use of appropriate performance measures.

Additionally, the CoC is responsible for leading a local decision making process regarding the use of ESG funds in Yolo. The CoC reviews and ranks all local ESG applications based on program design and performance in previous years, and makes a recommendation to the State regarding local funding priorities.

1C-3. Describe how the CoC coordinates with victim service providers and non-victim service providers (CoC Program funded and non-CoC funded) to ensure that survivors of domestic violence are provided housing and services that provide and maintain safety and security. Responses must address how the service providers ensure and maintain the safety and security of participants and how client choice is upheld.

FY2016 CoC Application	Page 8	09/07/2016
------------------------	--------	------------

#### (limit 1000 characters)

Empower Yolo (EY) is the only victim service provider (for survivors of domestic violence, dating violence, human trafficking, sexual assault and stalking) in Yolo. EY coordinates with the CoC to ensure that survivors are offered a range of safe housing options (including CoC, ESG, DOJ and HHS funded programs) through the coordinated entry system.

To ensure that homeless survivors have access to all available housing options in Yolo while also maintaining their confidentiality, the Yolo CoC implements the following process: 1) EY conducts an intake and VI-SPDAT with each survivor. 2) EY records client information and assessment results in an independent database comparable to HMIS. 3) EY sends de-identified VI-SPDAT results to the HMIS coordinator. 4) De-identified VI-SPDATs are integrated into the community que for coordinated entry. 5) When housing becomes available, EY considers the survivor's safety before linking the client, and develops a safety plan with each survivor.

1C-4. List each of the Public Housing Agencies (PHAs) within the CoC's geographic area. If there are more than 5 PHAs within the CoC's geographic area, list the 5 largest PHAs. For each PHA, provide the percentage of new admissions that were homeless at the time of admission between July 1, 2015 and June 30, 2016 and indicate whether the PHA has a homeless admissions preference in its Public Housing and/or Housing Choice Voucher (HCV) program.

Public Housing Agency Name	% New Admissions into Public Housing and Housing Choice Voucher Program from 7/1/15 to 6/30/16 who were homeless at entry	PHA has General or Limited Homeless Preference
Housing Authority of Yolo County	18.00%	No

1C-5. Other than CoC, ESG, Housing Choice Voucher Programs and Public Housing, describe other subsidized or low-income housing opportunities that exist within the CoC that target persons experiencing homelessness. (limit 1000 characters)

LOCAL: Yolo maintains multiple locally funded PSH projects for people with disabilities, serving varying levels of people experiencing homelessness. For instance, Cesar Chavez Plaza, has 32 beds dedicated to serving the chronically homeless.

STATE: The State allocated \$1.4M to Yolo for operating a rapid re-housing program dedicated to low-income homeless families eligible for TANF. Additionally, the County uses State mental health funding to operate a 26 bed

FY2016 CoC Application	Page 9	09/07/2016	
------------------------	--------	------------	--

PSH program for the homeless with mental illness.

FEDERAL: Yolo has 10 project based VASH vouchers for chronically homeless veterans, and recently secured 5 more.

Yolo also uses housing navigators to maximize the availability of housing options for people experiencing homelessness. These positions are responsible for (1) building relationships with local landlords, (2) maintaining knowledge of available affordable-housing units, and (3) assisting the homeless with housing placement.

# 1C-6. Select the specific strategies implemented by the CoC to ensure that homelessness is not criminalized in the CoC's geographic area. Select all that apply.

Engaged/educated local policymakers:	X
Engaged/educated law enforcement:	Х
Implemented communitywide plans:	Х
No strategies have been implemented	
Other:(limit 1000 characters)	
Homeless Neighborhood Court (H-NHC): Allows people experiencing homelessness to address criminal issues (nonviolent) through a community restoration justice process, without being charged or getting a criminal record. The process often addresses tickets or arrests for activities often engaged in by people experiencing homelessness that have been criminalized, such as illegal camping or panhandling. The individual meets with a panel of local community members to discuss the issue, and then completes a series of actions agreed upon by the panel in order to avoid criminal charges or a costly ticket. The program employs a full-time social worker to assist the individuals with ending their homelessness.	

FY2016 CoC Application	Page 10	09/07/2016	

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

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1D-1. Select the system(s) of care within the CoC's geographic area for which there is a discharge policy in place that is mandated by the State, the CoC, or another entity for the following institutions? Check all that apply.

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

1D-2. Select the system(s) of care within the CoC's geographic area with which the CoC actively coordinates with to ensure institutionalized persons that have resided in each system of care for longer than 90 days are not discharged into homelessness. Check all that apply.

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

1D-2a. If the applicant did not check all boxes in 1D-2, explain why there is no coordination with the institution(s) that were not selected and explain how the CoC plans to coordinate with the institution(s) to ensure persons

FY2016 CoC Application	Page 11	09/07/2016
------------------------	---------	------------

# discharged are not discharged into homelessness. (limit 1000 characters)

Not applicable. The CoC actively coordinates with the foster care, health care, mental health care and correctional systems to ensure that person residing in these systems are not discharged into homelessness.

# 1E. Centralized or Coordinated Assessment (Coordinated Entry)

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

The CoC Program Interim Rule requires CoCs to establish a Centralized or Coordinated Assessment System which HUD refers to as the Coordinated Entry Process. Based on the recent Coordinated Entry Policy Brief, HUD's primary goals for the coordinated entry process are that assistance be allocated as effectively as possible and that it be easily accessible no matter where or how people present for assistance.

1E-1. Explain how the CoC's coordinated entry process is designed to identify, engage, and assist homeless individuals and families that will ensure those who request or need assistance are connected to proper housing and services. (limit 1000 characters)

The Yolo CoC uses a "no wrong door" approach to coordinated entry, to ensure that people experiencing homelessness are identified, engaged and assisted with housing and services. All local homeless providers (covering the CoC's entire geographic area) participate as a point of entry in the system. Additionally, Yolo has a growing street outreach team that works to identify and engage homeless residents in services.

Each household is connected to coordinated entry through 3 steps:

- 1) Assessment: Each household is assessed and assigned a score using the VI-SPDAT.
- 2) Placement on Que: VI-SPDAT results are used to rank each household in the community que based on vulnerability.
- 3) Placement in Housing: The household at the top of the community que is prioritized first for housing as slots become available. Individuals or families who cannot immediately be placed in permanent housing continue to receive services from outreach workers or other providers while they wait for a bed.

1E-2. CoC Program and ESG Program funded projects are required to participate in the coordinated entry process, but there are many other organizations and individuals who may participate but are not required to do so. From the following list, for each type of organization or individual, select all of the applicable checkboxes that indicate how that organization

FY2016 CoC Application	Page 13	09/07/2016
------------------------	---------	------------

or individual participates in the CoC's coordinated entry process. If there are other organizations or persons who participate but are not on this list, enter the information in the blank text box, click "Save" at the bottom of the screen, and then select the applicable checkboxes.

Organization/Person Categories	Participate s in Ongoing Planning and Evaluation	Makes Referrals to the Coordinate d Entry Process	Receives Referrals from the Coordinate d Entry Process	Operates Access Point for Coordinate d Entry Process	Participate s in Case Conferenci ng	Does not Participate	Does not Exist
Local Government Staff/Officials	X	X	X	X	X		
CDBG/HOME/Entitlement Jurisdiction	x	x	x		x		
Law Enforcement	X	x					
Local Jail(s)		x		X	x		
Hospital(s)		x		X	x		
EMT/Crisis Response Team(s)	x	x		X	x		
Mental Health Service Organizations	X	x	X	X	x		
Substance Abuse Service Organizations	x	X	X	X	x		
Affordable Housing Developer(s)	x	x	x				
Public Housing Authorities	x	X	X	X	X		
Non-CoC Funded Youth Homeless Organizations	x	X	X		x		
School Administrators/Homeless Liaisons	X	X	X		X		
Non-CoC Funded Victim Service Organizations	X	x	X	X	x		
Street Outreach Team(s)	x	x	x	X	x		
Homeless or Formerly Homeless Persons	x				x		
Legal Services Providers	X	x	x		x		
Veterans Service Providers	x	x	x	X	x		
Healthcare Providers	x	x	x		x		

FY2016 CoC Application	Page 14	09/07/2016
------------------------	---------	------------

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

#### Instructions

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

# 1F-1. For all renewal project applications submitted in the FY 2016 CoC Program Competition complete the chart below regarding the CoC's review of the Annual Performance Report(s).

How many of the renewal project applications are first time renewals for which the first operating year has not expired yet?

How many renewal project application APRs were reviewed by the CoC as part of the local CoC competition project review, ranking, and selection process for the FY 2016 CoC Program Competition?

5

2

3

How many renewal project applications were submitted in the FY 2016 CoC Program Competition?

Percentage of APRs submitted by renewing projects within the Co Competition?	oC that were reviewed by the CoC in the 2	2016 CoC 100.00%
1F-2 - In the sections below, ch selection to indicate how project for the FY 2016 CoC Program Coi CoC's publicly announced Rating	applications were reviewed mpetition. Written documen	d and ranked ntation of the
Performance outcomes from APR reports/HMIS:		
% permanent housing exit destinations		X
% increases in income		Х
Monitoring criteria:		
Utilization rates		X
Drawdown rates		х
Frequency or Amount of Funds Recaptured by HUD		Х
Need for specialized population services:		
FY2016 CoC Application	Page 15	09/07/2016

Youth	х
Victims of Domestic Violence	х
Families with Children	Х
Persons Experiencing Chronic Homelessness	х
Veterans	Х
None:	

# 1F-2a. Describe how the CoC considered the severity of needs and vulnerabilities of participants that are, or will be, served by the project applications when determining project application priority. (limit 1000 characters)

Yolo considered the severity of need of participants in the ranking process by issuing an additional 5 points (out of 75) to projects serving highly vulnerable populations.

For PSH projects, the ranking process considered whether the project was prioritizing the chronically homeless, who generally have extensive vulnerabilities, including low incomes, substance use, criminal records, health or behavioral health challenges, resistance to receiving services, and vulnerability to victimization, illness or death.

For TH projects, the ranking process considered the rates of target populations served including: Veterans, who often have substance use issues, criminal records, and health or behavioral health issues; Survivors of domestic violence, who are often vulnerable to additional victimization; People with mental illness and/or substance use, who often have low incomes, criminal records, health issues; and youth, who often have an LGBTQ status and are vulnerable to victimization.

1F-3. Describe how the CoC made the local competition review, ranking, and selection criteria publicly available, and identify the public medium(s) used and the date(s) of posting. Evidence of the public posting must be attached. (limit 750 characters)

The CoC publicly posted a Notice of Funding Availability for the local FY 2016 Continuum of Care competition on July 14, 2016 on the County of Yolo website under the Homeless and Poverty Action Coalition (HPAC) (AKA, the Yolo CoC) webpage. The CoC formally adopted and publicly posted its FY 2016 Project Reallocation, Ranking and Selection Process on August 9, 2016 on the County of Yolo website under the HPAC webpage. The Process was also emailed to

FY2016 CoC Application	Page 16	09/07/2016
------------------------	---------	------------

the entire CoC membership on August 10, 2016.

1F-4. On what date did the CoC and Collaborative Applicant publicly post all parts of the FY 2016 CoC Consolidated Application that included the final project application ranking? (Written documentation of the public posting, with the date of the posting clearly visible, must be attached. In addition, evidence of communicating decisions to the CoC's full membership must be attached).

1F-5. Did the CoC use the reallocation process in the FY 2016 CoC Program Competition to reduce or reject projects for the creation of new projects? (If the CoC utilized the reallocation process, evidence of the public posting of the reallocation process must be attached.)

1F-5a. If the CoC rejected project application(s), on what date did the CoC and Collaborative Applicant notify those project applicants that their project application was rejected? (If project applications were rejected, a copy of the written notification to each project applicant must be attached.)

1F-6. In the Annual Renewal Demand (ARD) Yes is the CoC's FY 2016 CoC's FY 2016 Priority Listing equal to or less than the ARD on the final HUD-approved FY2016 GIW?

# 1G. Continuum of Care (CoC) Addressing Project Capacity

#### Instructions

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

# 1G-1. Describe how the CoC monitors the performance of CoC Program recipients. (limit 1000 characters)

Yolo monitors the performance of CoC Program recipients using two methods. The first method is a quarterly review of HMIS data. The task involves analyzing each project's data timeliness, completeness, and bed utilization. Consistent with Yolo's HMIS Data Quality Plan, if projects do not comply with the established goals, Yolo develops a technical assistance plan.

The second method is an annual review that is part of Yolo's CoC program ranking and reallocation process. A subcommittee of non-conflicted members uses a 75-point rubric to score each project based on utilization rates, increasing housing stability, participant eligibility, length of time homeless, destination upon program exit, increasing participant income, and connecting program participants to mainstream benefits. The rubric also measures fidelity to CoC program requirements such as timely submission of APRs and drawdowns. The subcommittee deems projects earning 55 points or less as underperforming.

1G-2. Did the Collaborative Applicant include Yes accurately completed and appropriately signed form HUD-2991(s) for all project applications submitted on the CoC Priority Listing?

FY2016 CoC Application	Page 18	09/07/2016
1 12010 CCC Application	i ago io	00/01/2010

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

#### Intructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2A-1. Does the CoC have a Governance Yes Charter that outlines the roles and responsibilities of the CoC and the HMIS Lead, either within the Charter itself or by reference to a separate document like an MOU/MOA? In all cases, the CoC's Governance Charter must be attached to receive credit, In addition, if applicable, any separate document, like an MOU/MOA, must also be attached to receive credit.

2A-1a. Include the page number where the roles and responsibilities of the CoC and HMIS Lead can be found in the attached document referenced in 2A-1. In addition, in the textbox indicate if the page number applies to the CoC's attached governance charter or attached MOU/MOA.

Governance Charter Pages 1, 3-4; MOU Pages 5-7

2A-2. Does the CoC have a HMIS Policies and Yes Procedures Manual? If yes, in order to receive credit the HMIS Policies and Procedures Manual must be attached to the CoC Application.

**2A-3. Are there agreements in place that** Yes outline roles and responsibilities between the **HMIS Lead and the Contributing HMIS** Organization (CHOs)?

**2A-4. What is the name of the HMIS software** Clarity Human Services Software

FY2016 CoC Application	Page 19	09/07/2016	1
------------------------	---------	------------	---

#### used by the CoC (e.g., ABC Software)?

**2A-5. What is the name of the HMIS software** vendor (e.g., ABC Systems)? Silver Spur Systems LLC/Bitfocus, Inc.

### 2B. Homeless Management Information System (HMIS) Funding Sources

CA-521

#### Instructions

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

#### 2B-1. Select the HMIS implementation Single CoC coverage area:

\* 2B-2. In the charts below, enter the amount of funding from each funding source that contributes to the total HMIS budget for the CoC.

2B-2.1 Funding Type: Federal - HUD

Funding Source	Funding	
СоС	\$5,333	
ESG	\$20,000	
CDBG	\$0	
HOME	\$0	
HOPWA	\$0	
Federal - HUD - Total Amount	\$25,333	

#### 2B-2.2 Funding Type: Other Federal

Funding Source	Funding
Department of Education	\$0
Department of Health and Human Services	\$0
Department of Labor	\$0
Department of Agriculture	\$0
Department of Veterans Affairs	\$0
Other Federal	\$0
Other Federal - Total Amount	\$0

#### 2B-2.3 Funding Type: State and Local

Funding Source		Funding
FY2016 CoC Application	Page 21	09/07/2016

City	\$0
County	\$2,350
State	\$0
State and Local - Total Amount	\$2,350

### 2B-2.4 Funding Type: Private

Funding Source	Funding
Individual	\$0
Organization	\$0
Private - Total Amount	\$0

#### 2B-2.5 Funding Type: Other

F	Funding Source	Funding
	Participation Fees	\$0
C	Other - Total Amount	\$0

2B-2.6 Total Budget for Operating Year	\$27,683

# 2C. Homeless Management Information System (HMIS) Bed Coverage

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

# 2C-1. Enter the date the CoC submitted the 04/04/2016 2016 HIC data in HDX, (mm/dd/yyyy):

# 2C-2. Per the 2016 Housing Inventory Count (HIC) Indicate the number of beds in the 2016 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 in that project type.

Project Type	Total Beds in 2016 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ESG) beds	211	35	54	30.68%
Safe Haven (SH) beds	0	0	0	
Transitional Housing (TH) beds	169	0	16	9.47%
Rapid Re-Housing (RRH) beds	1	0	1	100.00%
Permanent Supportive Housing (PSH) beds	101	0	37	36.63%
Other Permanent Housing (OPH) beds	0	0	0	

# 2C-2a. If the bed coverage rate for any project type is below 85 percent, describe how the CoC plans to increase the bed coverage rate for each of these project types in the next 12 months. (limit 1000 characters)

Over the next 12 months, Yolo will increase its HMIS bed coverage rates for both emergency shelter (ES) and permanent supportive housing (PSH) beds by completing the following actions.

- 1. Review options for working with Yolo County Housing to use HMIS for HUD VASH recipients, which include 10 PSH beds
- 2. Rework a county-administered CalWORKs Housing Support Program to include HMIS usage, which includes 85 ES voucher beds
- 3. Identify ways to encourage HMIS usage by Yolo's faith-based cold weather shelter, which includes 25 ES beds
- 4. Research technological innovations not currently used in Yolo such as biometric technology to reduce the data entry burden

FY2016 CoC Application	Page 23	09/07/2016
------------------------	---------	------------

# 2C-3. If any of the project types listed in question 2C-2 above have a coverage rate below 85 percent, and some or all of these rates can be attributed to beds covered by one of the following program types, please indicate that here by selecting all that apply from the list below.

VA Grant per diem (VA GPD):	Х
VASH:	Х
Faith-Based projects/Rescue mission:	Х
Youth focused projects:	
Voucher beds (non-permanent housing):	X
HOPWA projects:	
Not Applicable:	

**2C-4. How often does the CoC review or** Quarterly assess its HMIS bed coverage?

# 2D. Homeless Management Information System (HMIS) Data Quality

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

# 2D-1. Indicate the percentage of unduplicated client records with null or missing values and the percentage of "Client Doesn't Know" or "Client Refused" within the last 10 days of January 2016.

Universal Data Element	Percentage Null or Missing	Percentage Client Doesn't Know or Refused
3.1 Name	0%	0%
3.2 Social Security Number	0%	17%
3.3 Date of birth	0%	0%
3.4 Race	0%	0%
3.5 Ethnicity	0%	0%
3.6 Gender	0%	0%
3.7 Veteran status	0%	0%
3.8 Disabling condition	0%	1%
3.9 Residence prior to project entry	0%	0%
3.10 Project Entry Date	0%	0%
3.11 Project Exit Date	0%	0%
3.12 Destination	7%	0%
3.15 Relationship to Head of Household	0%	0%
3.16 Client Location	0%	0%
3.17 Length of time on street, in an emergency shelter, or safe haven	2%	0%

## 2D-2. Identify which of the following reports your HMIS generates. Select all that apply:

CoC Annual Performance Report (APR):			X
ESG Consolidated Annual Performance and Evaluation Report (CA	APER):		X
Annual Homeless Assessment Report (AHAR) table shells:			X
Point in Time (PIT)/Housing Inventory Count (HIC)			X
FY2016 CoC Application	Page 25	09/07	7/2016

Applicant: Davis/Woodland/Yolo County CoC  Project: CA-521 CoC Registration FY 2016  COC_RE	G_2016_	CA-521 _135459
None		
2D-3. If you submitted the 2016 AHAR, how 0 many AHAR tables (i.e., ES-ind, ES-family, etc) were accepted and used in the last AHAR?		
2D-4. How frequently does the CoC review Monthly data quality in the HMIS?		
2D-5. Select from the dropdown to indicate if Soth Project and CoC standardized HMIS data quality reports are generated to review data quality at the CoC level, project level, or both.		
2D-6. From the following list of federal partner programs, select the on that are currently using the CoC's HMIS.	es	
VA Supportive Services for Veteran Families (SSVF):		
VA Grant and Per Diem (GPD):	;	x
Runaway and Homeless Youth (RHY):		
Projects for Assistance in Transition from Homelessness (PATH):	,	X
None:		
2D-6a. If any of the Federal partner programs listed in 2D-6 are not currently entering data in the CoC's HMIS and intend to begin entering data in the next 12 months, indicate the Federal partner program and the anticipated start date.  (limit 750 characters)  The Yolo CoC does not receive any funding from VA SSVF or RHY. Therefore these federal partners do not currently utilize the local HMIS.		

FY2016 CoC Application	Page 26	09/07/2016

However, in the next 12 months Yolo will start using HMIS for a project funded by the Substance Abuse and Mental Health Services Administration (SAMHSA). SAMHSA awarded Yolo County a Cooperative Agreement to Benefit Homeless Individuals (CABHI) grant in July 2016. The CoC anticipates a project start date, including HMIS implementation, by October 2016.

## 2E. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

The data collected during the PIT count is vital for both CoC's and HUD. HUD needs accurate data to understand the context and nature of homelessness throughout the country, and to provide Congressand the Office of Management and Budget (OMB) with information regarding services provided, gaps in service, and performance. Accurate, high quality data is vital to inform Congress' funding decisions.

2E-1. Did the CoC approve the final sheltered Yes PIT count methodology for the 2016 sheltered PIT count?

2E-2. Indicate the date of the most recent 01/25/2016 sheltered PIT count: (mm/dd/yyyy)

2E-2a. If the CoC conducted the sheltered PIT Not Applicable count outside of the last 10 days of January 2016, was an exception granted by HUD?

2E-3. Enter the date the CoC submitted the 04/04/2016 sheltered PIT count data in HDX: (mm/dd/yyyy)

## 2F. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count: Methods

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

# 2F-1. Indicate the method(s) used to count sheltered homeless persons during the 2016 PIT count:

Complete Census Count:	X
Random sample and extrapolation:	
Non-random sample and extrapolation:	
2F-2. Indicate the methods used to gather and calculate subpopulat data for sheltered homeless persons:	ion
HMIS:	Х
HMIS plus extrapolation:	
Interview of sheltered persons:	Х
Sample of PIT interviews plus extrapolation:	

2F-3. Provide a brief description of your CoC's sheltered PIT count methodology and describe why your CoC selected its sheltered PIT count methodology. (limit 1000 characters)

Yolo used two primary methods for its 2016 sheltered PIT count methodology: HMIS and interviews. More specifically, Yolo used HMIS for HMIS-participating providers, who demonstrated sufficient data quality, to generate both the count

FY2016 CoC Application	Page 29	09/07/2016
1 12010 000 1 ppilodilon	i ago zo	00/01/2010

and sub-population information. For all other providers, Yolo used surveys to interview sheltered persons. To ensure de-duplicated information, Yolo designated a Count Coordinator to cross check information with the data extrapolated from HMIS.

While Yolo would have preferred to rely exclusively on HMIS, Yolo does not yet have high enough coverage rates. Thus, Yolo elected to use HMIS to supply only a portion of the information and interviews for the remaining persons. Yolo chose this two-pronged methodology to ensure comprehensive data on all persons residing within the designated service area. As Yolo is a small county, comprised of 1,021 square miles, the approach is not as burdensome or resource intensive as other larger communities.

2F-4. Describe any change in methodology from your sheltered PIT count in 2015 to 2016, including any change in sampling or extrapolation method, if applicable. Do not include information on changes to the implementation of your sheltered PIT count methodology (e.g., enhanced training or change in partners participating in the PIT count). (limit 1000 characters)

The most significant change from 2015 to 2016 in terms of its sheltered PIT methodology is that Yolo relied on data extrapolated from HMIS. Rather than simply using HMIS to verify interview information, this year Yolo used HMIS to generate stand-alone enumeration for several projects. The projects had to demonstrate high data quality by meeting Yolo's local standards for timeliness, completeness, accuracy, and consistency.

The advantage to this change in methodology is two-fold. First, Yolo realized time and resource-saving benefits by not having to conduct manual interviews. Second, Yolo reinforced the value of HMIS. By making HMIS a source for annual PIT data, Yolo hopes to encourage greater provider participation and improved data quality, which in turn makes HMIS a more useful tool for planning and reporting.

# 2F-5. Did your CoC change its provider Yes coverage in the 2016 sheltered count?

# 2F-5a. If "Yes" in 2F-5, then describe the change in provider coverage in the 2016 sheltered count. (limit 750 characters)

Yolo's 2016 sheltered count included two new projects that were not fully operational during the 2015 sheltered count. The first was the CalWORKs Housing Support Program, which features rapid re-housing assistance coupled with an emergency shelter voucher component for families waiting for permanent housing placement. The second project was Yolo County's Direct Client Support project, which uses local resources to pay for emergency shelter vouchers. The project provides shelter for clients who have a long-term housing

1 120 10 COC Application   Fage 30   09/01/2010	FY2016 CoC Application	Page 30	09/07/2016
---	------------------------	---------	------------

plan, but are experiencing a short-term emergency.

In addition, Yolo removed the 65-bed Bridge to Housing project as it was a temporary pilot that ended with a majority of participants receiving Housing Choice vouchers.

## 2G. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count: Data Quality

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

# 2G-1. Indicate the methods used to ensure the quality of the data collected during the sheltered PIT count:

Training:	X
Follow-up:	Х
HMIS:	Х
Non-HMIS de-duplication techniques:	

2G-2. Describe any change to the way your CoC implemented its sheltered PIT count from 2015 to 2016 that would change data quality, including changes to training volunteers and inclusion of any partner agencies in the sheltered PIT count planning and implementation, if applicable. Do not include information on changes to actual sheltered PIT count methodology (e.g. change in sampling or extrapolation methods). (limit 1000 characters)

The most significant change from 2015 to 2016 in terms of its sheltered PIT implementation is that Yolo placed more emphasis on HMIS data quality. Since Yolo allowed some HMIS-participating providers to submit extrapolated data, Yolo pulled project-level data quality reports and client roster reports to ensure accuracy and completeness. The data quality reports checked for missing data fields within individual client records and tracked the number of clients with missing or non-responsive values for key data elements.

FY2016 CoC Application	Page 32	09/07/2016	
1 12010 000 Application	. ago o <u>-</u>	00/01/2010	

## 2H. Continuum of Care (CoC) Unsheltered Pointin-Time (PIT) Count

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

HUD requires CoCs to conduct an unsheltered PIT count every 2 years (biennially) during the last 10 days in January; however, HUD also strongly encourages CoCs to conduct the unsheltered PIT count annually at the same time that they conduct annual sheltered PIT counts. HUD required CoCs to conduct the last biennial PIT count during the last 10 days in January 2015.

2H-1. Did the CoC approve the final Yes unsheltered PIT count methodology for the most recent unsheltered PIT count?

2H-2. Indicate the date of the most recent 01/26/2015 unsheltered PIT count (mm/dd/yyyy):

2H-2a. If the CoC conducted the unsheltered Not Applicable PIT count outside of the last 10 days of January 2016, or most recent count, was an exception granted by HUD?

2H-3. Enter the date the CoC submitted the 05/15/2015 unsheltered PIT count data in HDX (mm/dd/yyyy):

## 2I. Continuum of Care (CoC) Unsheltered Pointin-Time (PIT) Count: Methods

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

# 2I-1. Indicate the methods used to count unsheltered homeless persons during the 2016 or most recent PIT count:

Night of the count - complete census:	Х
Night of the count - known locations:	
Night of the count - random sample:	
Service-based count:	Х
HMIS:	

# 2I-2. Provide a brief descripton of your CoC's unsheltered PIT count methodology and describe why your CoC selected this unsheltered PIT count methodology. (limit 1000 characters)

For its 2015 unsheltered PIT count methodology, Yolo used a combined approach of both the complete census count and service based count. Dividing the service region into four distinct geographic areas, Yolo's mixed method strategy used a different day of the week to cover each area. On nights other than the designated PIT night, Yolo added additional interview questions to (1) ensure the individual or family was unsheltered on the night of the count and (2) determine whether the individual or family had already been counted.

Yolo selected this methodology because the county is small enough that a random sample is not necessary to conduct a thorough count. Yet, since the county consists of many rural and unincorporated areas, Yolo has to rely on service based counts to ensure a comprehensive canvassing of the entire geographic area.

FY2016 CoC Application	Page 34	09/07/2016

2I-3. Describe any change in methodology from your unsheltered PIT count in 2015 (or 2014 if an unsheltered count was not conducted in 2015) to 2016, including any change in sampling or extrapolation method, if applicable. Do not include information on changes to implementation of your sheltered PIT count methodology (e.g., enhanced training or change in partners participating in the count). (limit 1000 characters)

Not applicable.

2I-4. Has the CoC taken extra measures to Yes identify unaccompanied homeless youth in the PIT count?

2I-4a. If the response in 2I-4 was "no" describe any extra measures that are being taken to identify youth and what the CoC is doing for homeless youth.
(limit 1000 characters)

In 2015, Yolo took several extra measures to identify unaccompanied homeless youth. To better align itself with HUD's goal of ending youth homelessness by 2020, Yolo pursued and ultimately received a \$12,000 grant from We Count, California!. The additional funds allowed count enumerators to use tablets as well as provide gift cards incentives to participants. The grant also allowed Yolo to plan a more robust canvassing effort, which included representation from 15 community-based organizations.

Previous counts have sought to identify unaccompanied youth, but specific methods were not used, resulting in little to no data. For example, in 2011, Yolo identified one unaccompanied youth, while in 2013 Yolo identified none. Contrasting those results with the 2015 results of 49 demonstrates the need for Yolo to continue to employ special methods to obtain more accurate data on homeless youth within the community.

## 2J. Continuum of Care (CoC) Unsheltered Pointin-Time (PIT) Count: Data Quality

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

## 2J-1. Indicate the steps taken by the CoC to ensure the quality of the data collected for the 2016 unsheltered PIT count:

Training:	Х
"Blitz" count:	
Unique identifier:	Х
Survey questions:	Х
Enumerator observation:	Х
Comprehensive Review Process During Data Entry	Х
None:	

2J-2. Describe any change to the way the CoC implemented the unsheltered PIT count from 2015 (or 2014 if an unsheltered count was not conducted in 2015) to 2016 that would affect data quality. This includes changes to training volunteers and inclusion of any partner agencies in the unsheltered PIT count planning and implementation, if applicable. Do not include information on changes in actual methodology (e.g. change in sampling or extrapolation method). (limit 1000 characters)

In 2015, Yolo implemented several changes intended to improve the overall quality of the unsheltered count data, including:

- 1. Expanding training provided to street canvassers, to ensure that counters understood all questions and that the methodology used was consistent
- 2. Recruiting a strong mix of formerly homeless and experienced homeless providers to help with the count
- 3. Creating an electronic survey (a paper option was also available), to reduce

FY2016 CoC Application	Page 36	09/07/2016
------------------------	---------	------------

data entry errors caused by having to enter a large number of paper surveys into a spreadsheet

4. Providing electronic tablets to counters to be used in street outreach

5. Convening a Youth Count Subcommittee, to focus on better identification of homeless youth in the count

6. Providing incentives for homeless individuals to participate in the count, such as gift cards, hygiene supplies and socks

FY2016 CoC Application   Page 37   09/07/2016
---

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

### Instructions

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

### 3A-1. Performance Measure: Number of Persons Homeless - Point-in-Time Count.

### \* 3A-1a. Change in PIT Counts of Sheltered and Unsheltered Homeless Persons

Using the table below, indicate the number of persons who were homeless at a Point-in-Time (PIT) based on the 2015 and 2016 PIT counts as recorded in the Homelessness Data Exchange (HDX).

	2015 PIT (for unsheltered count, most recent year conducted)	2016 PIT	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	498	532	34
Emergency Shelter Total	163	189	26
Safe Haven Total	0	0	0
Transitional Housing Total	142	150	8
Total Sheltered Count	305	339	34
Total Unsheltered Count	193	193	0

# 3A-1b. Number of Sheltered Persons Homeless - HMIS. Using HMIS data, enter the number of homeless persons who were served in a sheltered environment between October 1, 2014 and September 30, 2015 for each category provided.

	Between October 1, 2014 and September 30, 2015
Universe: Unduplicated Total sheltered homeless persons	757
Emergency Shelter Total	410
Safe Haven Total	0
Transitional Housing Total	347

#### 3A-2. Performance Measure: First Time Homeless.

Describe the CoC's efforts to reduce the number of individuals and families who become homeless for the first time. Specifically, describe what the CoC is doing to identify risk factors of becoming homeless.

FY2016 CoC Application Page 38 09/07/2
--

### (limit 1000 characters)

Yolo has identified that low-income households are at risk of first time homelessness due to low housing vacancy rates and rising rent costs in Yolo. The CoC has worked with Legal Services to identify that landlords are evicting low-income households from their existing rentals to raise the rent. These individuals often become homeless because the housing market is limited.

The CoC has taken several steps to avoid first time homelessness.

- 1) Legal Services assists people with avoiding evictions.
- 2) Household that are likely to become homeless are assessed for diversion opportunities.
- 3) Housing navigators build relationships with local landlords and help people in securing housing.
- 4) Local providers offer down payment assistance and assistance with paying utilities.
- 5) Local providers offer short term loans to assist clients in addressing unpaid rent.
- 6) Rapid re-housing providers offer households at-risk of homelessness assistance in locating and paying for new housing.

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

Describe the CoC's efforts to reduce the length of time individuals and families remain homeless. Specifically, describe how your CoC has reduced the average length of time homeless, including how the CoC identifies and houses individuals and families with the longest lengths of time homeless.

### (limit 1000 characters)

Yolo's efforts to reduce the length of time persons remain homeless have focused primarily on bolstering its street outreach and coordinated entry efforts. By having more outreach workers administering VI-SPDAT assessments, Yolo hopes to not only identify and engage all unsheltered homeless persons residing within its community, but also prioritize persons who have the longest histories of homelessness.

Yolo relies on HMIS to track and record the length of time homeless. In the upcoming year, the CoC intends to expand the number of providers using HMIS. This will allow Yolo to better track the measure for all persons served, rather than just persons from CoC and ESG funded programs.

In terms of the planning process to reduce the measure, the CoC relies on its Data Subcommittee to review HUD's System Performance Measure Report and set local goals. A priority area for the coming year will be to reduce the average and median length of time individuals and families remain homeless.

### \* 3A-4. Performance Measure: Successful Permanent Housing Placement or Retention.

FY2016 CoC Application	Page 39	09/07/2016
------------------------	---------	------------

In the next two questions, CoCs must indicate the success of its projects in placing persons from its projects into permanent housing.

# 3A-4a. Exits to Permanent Housing Destinations: Fill in the chart to indicate the extent to which projects exit program participants into permanent housing (subsidized or non-subsidized) or the retention of program participants in CoC Program-funded permanent supportive housing.

	Between October 1, 2014 and September 30, 2015
Universe: Persons in SSO, TH and PH-RRH who exited	210
Of the persons in the Universe above, how many of those exited to permanent destinations?	150
% Successful Exits	71.43%

### 3A-4b. Exit To or Retention Of Permanent Housing: In the chart below, CoCs must indicate the number of persons who exited from any CoC funded permanent housing project, except rapid re-housing projects, to permanent housing destinations or retained their permanent housing between October 1, 2014 and September 31, 2015.

	Between October 1, 2014 and September 30, 2015
Universe: Persons in all PH projects except PH-RRH	24
Of the persons in the Universe above, indicate how many of those remained in applicable PH projects and how many of those exited to permanent destinations?	20
% Successful Retentions/Exits	83.33%

3A-5. Performance Measure: Returns to Homelessness: Describe the CoCs efforts to reduce the rate of individuals and families who return to homelessness. Specifically, describe strategies your CoC has implemented to identify and minimize returns to homelessness, and demonstrate the use of HMIS or a comparable database to monitor and record returns to homelessness. (limit 1000 characters)

According to its System Performance Measure (SPM) report, the extent to which persons exiting homelessness experienced additional bouts in Yolo had an average return rate within 6, 12, and 24 months of 5.32 percent. While the rate is indicative of Yolo's success at securing permanent and stable housing placements, the CoC is committed to further reducing this measure by implementing the following strategies.

- Connect all persons exiting with mainstream services to ensure that they receive the support they need to maintain their housing
- Provide housing navigation services for formerly homeless persons at risk of losing their housing, including landlord mediation and past due rental assistance
- Assess all homeless persons for potential diversion or re-housing options

FY2016 CoC Application	Page 40	09/07/2016
------------------------	---------	------------

Yolo uses HMIS to monitor returns to homelessness. The CoC maintains an open HMIS system, where all agencies can view and share service history information, which allows Yolo to accurately track returns.

3A-6. Performance Measure: Job and Income Growth. Performance Measure: Job and Income Growth. Describe the CoC's specific strategies to assist CoC Program-funded projects to increase program participants' cash income from employment and non-employment non-cash sources. (limit 1000 characters)

In the past year, the CoC has made multiple efforts to increase job and income growth, most notably, by partnering with region's advocate resource team, called SMART-Y. SMART-Y utilizes a SOAR-like model to enroll homeless persons in federal and state benefits programs. SMART-Y has an average determination timeframe of approximately 60 days, compared to the national average of 6 to 24 months. Additionally, due to face-to-face interviews with determination representatives, more than 60% of claimants are awarded the benefits.

In addition, within the next year, Yolo County will be hiring an Employment Specialist to assist homeless clients with job search activities. The specialist will also work to develop and cultivate relationships with employers and employment support services to make for an easier matching and job placement process.

Due to these strategies, Yolo demonstrated and will continue to demonstrate success at increasing program participant income.

# 3A-6a. Describe how the CoC is working with mainstream employment organizations to aid homeless individuals and families in increasing their income. (limit 1000 characters)

The Employment Division of the Yolo County Health and Human Services Agency (HHSA) works closely with other homeless providers to assist homeless individuals in securing mainstream employment. HHSA provides training and assistance to homeless individuals looking for employment (such as resume assistance, skills training, interview prep, job search and placement, and bus tickets to interviews). HHSA works with a wide range of mainstream employers in Yolo (such as the Lincoln Training Center and Goodwill).

100% of homeless providers in Yolo work directly with HHSA to help their participants secure income. In addition, some non-profit providers maintain their own relationships with private employers, or hire homeless individuals for positions within their own organization. For instance, Shores of Hope maintains a work training program for homeless individuals, and also has multiple formerly homeless individuals on staff.

### 3A-7. What was the the criteria and decision-making process the CoC

FY2016 CoC Application	Page 41	09/07/2016
------------------------	---------	------------

used to identify and exclude specific geographic areas from the CoC's unsheltered PIT count? (limit 1000 characters)

Not applicable.

3A-7a. Did the CoC completely exclude geographic areas from the the most recent PIT count (i.e., no one counted there and, for communities using samples the area was excluded from both the sample and extrapolation) where the CoC determined that there were no unsheltered homeless people, including areas that are uninhabitable (e.g. disasters)?

3A-7b. Did the CoC completely exclude geographic areas from the the most recent PIT count (i.e., no one counted there and, for communities using samples the area was excluded from both the sample and extrapolation) where the CoC determined that there were no unsheltered homeless people, including areas that are uninhabitable (e.g. deserts, wilderness, etc.)? (limit 1000 characters)

Not applicable.

3A-8. Enter the date the CoC submitted the 07/21/2016 system performance measure data into HDX. The System Performance Report generated by HDX must be attached. (mm/dd/yyyy)

3A-8a. If the CoC was unable to submit their System Performance Measures data to HUD via the HDX by the deadline, explain why and describe what specific steps they are taking to ensure they meet the next HDX submission deadline for System Performance Measures data. (limit 1500 characters)

Not applicable.

FY2016 CoC Application	Page 42	09/07/2016
1 12010 000 1 (ppiloation	i ago .=	00/01/2010

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

### **Objective 1: Ending Chronic Homelessness**

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

To end chronic homelessness by 2017, HUD encourages three areas of focus through the implementation of Notice CPD 14-012: Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status.

1. Targeting persons with the highest needs and longest histories of homelessness for existing and new permanent supportive housing;

2. Prioritizing chronically homeless individuals, youth and families who have the longest histories of homelessness; and

3. The highest needs for new and turnover units.

3B-1.1. Compare the total number of chronically homeless persons, which includes persons in families, in the CoC as reported by the CoC for the 2016 PIT count compared to 2015 (or 2014 if an unsheltered count was not conducted in 2015).

	2015 (for unsheltered count, most recent year conducted)	2016	Difference
Universe: Total PIT Count of sheltered and unsheltered chronically homeless persons	87	89	2
Sheltered Count of chronically homeless persons	43	45	2
Unsheltered Count of chronically homeless persons	44	44	0

3B-1.1a. Using the "Differences" calculated in question 3B-1.1 above, explain the reason(s) for any increase, or no change in the overall TOTAL number of chronically homeless persons in the CoC, as well as the change in the unsheltered count, as reported in the PIT count in 2016 compared to 2015. (limit 1000 characters)

|--|

When comparing 2015 to 2016, Yolo experienced an increase of two chronically homeless sheltered persons. The slight increase or lack of decrease is likely because Yolo did not add any new permanent housing projects this year. It is also inherently connected to California's housing affordability crisis. The average rental vacancy rate in Yolo County for the first quarter of 2016 was 2.7 percent. Given such a low vacancy rate, Yolo is struggling to secure permanent housing placements beyond its already existing PSH inventory.

The number of chronically homeless unsheltered persons remained unchanged, as Yolo did not conduct an unsheltered count in 2016.

# 3B-1.2. Compare the total number of PSH beds (CoC Program and non-CoC Program funded) that were identified as dedicated for use by chronically homeless persons on the 2016 Housing Inventory Count, as compared to those identified on the 2015 Housing Inventory Count.

	2015	2016	Difference
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homelessness persons identified on the HIC.	77	77	0

3B-1.2a. Explain the reason(s) for any increase, or no change in the total number of PSH beds (CoC program funded or non-CoC Program funded) that were identified as dedicated for use by chronically homeless persons on the 2016 Housing Inventory Count compared to those identified on the 2015 Housing Inventory Count. (limit 1000 characters)

Yolo experienced no change in the total number of PSH beds dedicated for use by chronically homeless persons. This is partly because Yolo has not been successful in securing additional funding for PSH projects. In fact, Yolo has endured several consecutive years of HUD funding cuts.

In an attempt to improve this, the Yolo County Board of Supervisors recently adopted homelessness as one of its strategic plan priorities. Investing local resources to strengthen the region's CoC, the County is working diligently with the CoC to create new PSH projects dedicated for the chronically homeless. In fact, Yolo has already begun construction on two PSH projects, but Yolo does not anticipate them to start operating for another few years.

3B-1.3. Did the CoC adopt the Orders of Priority into their standards for all CoC
Program funded PSH as described in Notice
CPD-14-012: Prioritizing Persons
Experiencing Chronic Homelessness in
Permanent Supportive Housing and
Recordkeeping Requirements for
Documenting Chronic Homeless Status?

**3B-1.3a.** If "Yes" was selected for question Pages 15 to 17 3B-1.3, attach a copy of the CoC's written standards or other evidence that clearly shows the incorporation of the Orders of Priority in Notice CPD 14-012 and indicate the page(s) for all documents where the Orders of Priority are found.

### **3B-1.4.** Is the CoC on track to meet the goal No of ending chronic homelessness by 2017?

This question will not be scored.

3B-1.4a. If the response to question 3B-1.4 was "Yes" what are the strategies that have been implemented by the CoC to maximize current resources to meet this goal? If "No" was selected, what resources or technical assistance will be implemented by the CoC to reach to goal of ending chronically homelessness by 2017? (limit 1000 characters)

In order to end chronic homelessness in Yolo the CoC needs additional resources for permanent supportive housing and housing subsidies. The CoC is planning to add several new PSH projects in the upcoming 1-4 years, but they will not accommodate Yolo's entire chronically homeless population, and in some cases will take several years to get up and running.

Additionally, Yolo's current system is not strong enough to prevent additional people from becoming chronically homeless. Yolo has limited prevention services, so new households are constantly entering the homeless system. Once a person becomes homeless, low housing vacancy rates and high rent costs make it difficult to help the person secure new housing at an affordable rate. The CoC would benefit from technical assistance on effective strategies for rapidly housing people with limited housing options, so they do not become chronically homeless.

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

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

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

HUD will evaluate CoC's based on the extent to which they are making progress to achieve the goal of ending homelessness among households with children by 2020.

### 3B-2.1. What factors will the CoC use to prioritize households with children during the FY2016 Operating year? (Check all that apply).

Vulnerability to victimization:	X
Number of previous homeless episodes:	X
Unsheltered homelessness:	Х
Criminal History:	Х
Bad credit or rental history (including not having been a leaseholder):	X
Head of household has mental/physical disabilities:	Х
Frequency of interactions with law enforcement or hospital systems	X
N/A:	

# 3B-2.2. Describe the CoC's strategies including concrete steps to rapidly rehouse every household with children within 30 days of those families becoming homeless. (limit 1000 characters)

FY2016 CoC Application	Page 46	09/07/2016
------------------------	---------	------------

In FY 2015 Yolo received a \$1.4M allocation from the State to provide RRH services to any low-income CalWORKs (TANF) family. When a homeless family is identified the County immediately places them in shelter or a motel paid for by the County. Case managers work intensively with families to secure permanent housing within 30 days, and the County pays the household's rent for up to 6 months. Case managers work with the household to help them become self-sufficient in the 6-month time-frame.

The CoC also receives a small RRH allocation from ESG. This funding prioritizes low-income families that do not qualify for CalWORKs (to avoid duplication of services). The program also serves the most vulnerable single adults when needed.

In FY 2015, the County CalWORKs Housing program will begin participating in coordinated entry to ensure that the most vulnerable households are placed in permanent housing first.

### 3B-2.3. Compare the number of RRH units available to serve families from the 2015 and 2016 HIC.

	2015	2016	Difference
RRH units available to serve families in the HIC:	7	1	-6

# 3B-2.4. How does the CoC ensure that emergency shelters, transitional housing, and permanent housing (PSH and RRH) providers within the CoC do not deny admission to or separate any family members from other members of their family based on age, sex, gender or disability when entering shelter or housing? (check all strategies that apply)

CoC policies and procedures prohibit involuntary family separation:	X
There is a method for clients to alert CoC when involuntarily separated:	
CoC holds trainings on preventing involuntary family separation, at least once a year:	
Individual agency policies and procedures prohibit involuntary family separation	X
Dedicated family space within each local shelter	Х
None:	

# 3B-2.5. Compare the total number of homeless households with children in the CoC as reported by the CoC for the 2016 PIT count compared to 2015 (or 2014 if an unsheltered count was not conducted in 2015).

FY2016 CoC Application	Page 47	09/07/2016

### PIT Count of Homelessness Among Households With Children

	2015 (for unsheltered count, most recent year conducted)	2016	Difference
Universe: Total PIT Count of sheltered and unsheltered homeless households with children:	42	71	29
Sheltered Count of homeless households with children:	36	65	29
Unsheltered Count of homeless households with children:	6	6	0

# 3B-2.5a. Explain the reason(s) for any increase, or no change in the total number of homeless households with children in the CoC as reported in the 2016 PIT count compared to the 2015 PIT count. (limit 1000 characters)

When comparing 2015 to 2016, Yolo experienced a significant increase in sheltered homeless households with children as the County started operating a CalWORKs Housing Support Program. Yolo did not include the project in its 2015 sheltered PIT count as it was not fully operational at that time. The project features rapid re-housing assistance coupled with an emergency shelter voucher component for CalWORKs-eligible families waiting for permanent housing placement.

There were no changes in the unsheltered count, as Yolo did not conduct an unsheltered count in 2016.

# 3B-2.6. From the list below select the strategies to the CoC uses to address the unique needs of unaccompanied homeless youth including youth under age 18, and youth ages 18-24, including the following.

Human trafficking and other forms of exploitation?	Yes
LGBTQ 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
Unaccompanied minors/youth below the age of 18?	Yes

### 3B-2.6a. Select all strategies that the CoC uses to address homeless youth trafficking and other forms of exploitation.

_			
	FY2016 CoC Application	Page 48	09/07/2016

Increase housing and service options for youth fleeing or attempting to flee trafficking:	Х
Specific sampling methodology for enumerating and characterizing local youth trafficking:	Х
Cross systems strategies to quickly identify and prevent occurrences of youth trafficking:	Х
Community awareness training concerning youth trafficking:	
Legal services offers assistance with acquiring T-Visas	Х
N/A:	

# 3B-2.7. What factors will the CoC use to prioritize unaccompanied youth including youth under age 18, and youth ages 18-24 for housing and services during the FY 2016 operating year? (Check all that apply)

Vulnerability to victimization:	Х
Length of time homeless:	Х
Unsheltered homelessness:	Х
Lack of access to family and community support networks:	Х
Head of household has disability of mental illness	X
N/A:	

# 3B-2.8. Using HMIS, compare all unaccompanied youth including youth under age 18, and youth ages 18-24 served in any HMIS contributing program who were in an unsheltered situation prior to entry in FY 2014 (October 1, 2013-September 30, 2014) and FY 2015 (October 1, 2014 - September 30, 2015).

	FY 2014 (October 1, 2013 - September 30, 2014)	FY 2015 (October 1, 2014 - September 30, 2105)	Difference
Total number of unaccompanied youth served in HMIS contributing programs who were in an unsheltered situation prior to entry:	4	14	10

FY2016 CoC Application	Page 49	09/07/2016

3B-2.8a. If the number of unaccompanied youth and children, and youth-headed households with children served in any HMIS contributing program who were in an unsheltered situation prior to entry in FY 2015 is lower than FY 2014 explain why. (limit 1000 characters)

The number of unaccompanied homeless youth who entered an HMIS project from an unsheltered situation increased from 2014 to 2015 due to improved outreach and engagement. Over the past year, Yolo has significantly bolstered its outreach efforts by hiring several new outreach workers, dedicated to covering the entire service area. Previously, Yolo had a decentralized and fragmented outreach system with minimal regional coordination among the various cities and unincorporated areas.

The expansion and improved coordination has allowed Yolo to incorporate specific evidence based service interventions proven to be effective in engaging homeless youth. Such interventions include positive youth development, trauma informed care, and family engagement services. Thus, while Yolo's total number of unaccompanied youth entering from an unsheltered situation increased, the upturn is largely attributable to improved efforts by the CoC in identifying and linking homeless youth with services.

### 3B-2.9. Compare funding for youth homelessness in the CoC's geographic area in CY 2016 and CY 2017.

	Calendar Year 2016	Calendar Year 2017	Difference
Overall funding for youth homelessness dedicated projects (CoC Program and non-CoC Program funded):	\$0.00	\$0.00	\$0.00
CoC Program funding for youth homelessness dedicated projects:			\$0.00
Non-CoC funding for youth homelessness dedicated projects (e.g. RHY or other Federal, State and Local funding):			\$0.00

# 3B-2.10. To what extent have youth services and educational representatives, and CoC representatives participated in each other's meetings between July 1, 2015 and June 30, 2016?

Cross-Participation in Meetings	# Times
CoC meetings or planning events attended by LEA or SEA representatives:	
LEA or SEA meetings or planning events (e.g. those about child welfare, juvenille justice or out of school time) attended by CoC representatives:	
CoC meetings or planning events attended by youth housing and service providers (e.g. RHY providers):	

# 3B-2.10a. Based on the responses in 3B-2.10, describe in detail how the CoC collaborates with the McKinney-Vento local educational authorities and school districts. (limit 1000 characters)

FY2016 CoC Application	Page 50	09/07/2016
------------------------	---------	------------

The Yolo CoC and McKinney-Vento local education liaisons regularly coordinate on planning processes related to homelessness:

- 1. Education liaisons for the Yolo County Office of Education (YCOE) and Woodland Joint Unified School District attend CoC meetings.
- 2. Education liaisons actively participated on the Youth Count Sub-Committee for the 2015 unsheltered homeless count.
- 3. Education liaisons participate in the local 10-Year Plan to End Homelessness, including providing input on planning efforts and updates regarding progress.

The Yolo CoC and education liaisons also work closely together to identify and address the needs of homeless families. CoC member agencies and schools districts routinely collaborate on shared clients, working together to develop case plans for families that respect the children's educational rights. School districts also work closely with the County's CalWORKs Housing team to ensure that homeless families get rapidly re-housed.

3B-2.11. How does the CoC make sure that homeless individuals and families who become homeless are informed of their eligibility for and receive access to educational services? Include the policies and procedures that homeless service providers (CoC and ESG Programs) are required to follow. (limit 2000 characters)

All member agencies within the CoC (including CoC and ESG funded programs) are fully aware of the educational requirements outlined in the McKinney-Vento Act. It is the CoC's local policy that every time a household with minor children enters one of Yolo's housing programs or youth service providers the agency staff must inform the household of their educational rights. The agency staff then must collaborate with the education liaisons to ensure that every family has access to the appropriate educational services.

3B-2.12. Does the CoC or any HUD-funded projects within the CoC have any written agreements with a program that services infants, toddlers, and youth children, such as Head Start; Child Care and Development Fund; Healthy Start; Maternal, Infant, Early Childhood Home Visiting programs; Public Pre-K; and others? (limit 1000 characters)

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

### **Objective 3: Ending Veterans Homelessness**

#### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

Opening Doors outlines the goal of ending Veteran homelessness by the end of 2016. The following questions focus on the various strategies that will aid communities in meeting this goal.

# 3B-3.1. Compare the total number of homeless Veterans in the CoC as reported by the CoC for the 2016 PIT count compared to 2015 (or 2014 if an unsheltered count was not conducted in 2015).

	2015 (for unsheltered count, most recent year conducted)	2016	Difference
Universe: Total PIT count of sheltered and unsheltered homeless veterans:	44	29	-15
Sheltered count of homeless veterans:	28	13	-15
Unsheltered count of homeless veterans:	16	16	0

# 3B-3.1a. Explain the reason(s) for any increase, or no change in the total number of homeless veterans in the CoC as reported in the 2016 PIT count compared to the 2015 PIT count. (limit 1000 characters)

Compared to the 2015 PIT sheltered count, Yolo's 2016 PIT sheltered count indicated a 15-person decrease in the number of homeless veterans. This represents a 46 percent reduction. The drop is likely attributable to the CoC's strong partnership with the local Housing Authority in its distribution of HUD-VASH vouchers. In 2014, Yolo received 10 new vouchers and in 2016, Yolo received another 5 new vouchers. Additionally, the 5 new vouchers are not project based, meaning the usage is not tied to one city, allowing for much more flexibility.

Another reason for the change may be the CoC's efforts to better identify veterans through increased street outreach efforts. As Yolo continues to build the number of veterans who are identified and assessed, Yolo plans to work

FY2016 CoC Application	Page 52	09/07/2016
------------------------	---------	------------

with the local VAMC to create a shared and prioritized list.

The CoC does not suspect that any changes in PIT methodology influenced the reduction.

# 3B-3.2. Describe how the CoC identifies, assesses, and refers homeless veterans who are eligible for Veterean's Affairs services and housing to appropriate reources such as HUD-VASH and SSVF. (limit 1000 characters)

Veterans enter the homeless system in Yolo by (1) presenting for services at a provider, (2) being contacted by an outreach team, or (3) being referred from the local veteran's services. All persons entering Yolo's homeless system are asked multiple questions during intake regarding their veteran status. If an individual is determined to be a veteran, the CoC takes several steps to connect them with services:

- 1) Determine whether the individual is already receiving veteran's benefits and help address any issues.
- 2) Place them on the waitlist for HUD-VASH.
- 3) Provide a direct referral and warm hand-off to the VAMC and local veteran's services office.
- 4) Ensure that the veteran has transportation to the closest VA office if needed.

# 3B-3.3. Compare the total number of homeless Veterans in the CoC and the total number of unsheltered homeless Veterans in the CoC, as reported by the CoC for the 2016 PIT Count compared to the 2010 PIT Count (or 2009 if an unsheltered count was not conducted in 2010).

	2010 (or 2009 if an unsheltered count was not conducted in 2010)	2016	% Difference
Total PIT Count of sheltered and unsheltered homeless veterans:	4	13	225.00%
Unsheltered Count of homeless veterans:	0	16	0.00%

## 3B-3.4. Indicate from the dropdown whether No you are on target to end Veteran homelessness by the end of 2016.

This question will not be scored.

# 3B-3.4a. If "Yes", what are the strategies being used to maximize your current resources to meet this goal? If "No" what resources or technical assistance would help you reach the goal of ending Veteran

FY2016 CoC Application Page 53 09/07/2016		FY2016 COC Application		
---	--	------------------------	--	--

### homelessness by the end of 2016? (limit 1000 characters)

The Yolo CoC has a relatively small homeless veteran population, but does not currently have the resources to house all its veterans. Yolo is working to increase its street outreach capacity, which will help the CoC identify and link homeless veterans with services.

However, once a veteran is identified Yolo struggles with finding an appropriate housing placement. The CoC only receives 15 HUD-VASH vouchers, 10 of which are project based, and therefore tied to only one of Yolo's cities. Veterans who do not want to relocate from West Sacramento or Davis to Woodland cannot utilize the VASH vouchers. Additionally, the nearest VA facilities are at least 45 minutes away, which presents challenges in linking veterans with eligible services. To end veteran homelessness Yolo needs additional VASH vouchers and local staff dedicated to working with homeless veterans.

### 4A. Accessing Mainstream Benefits

### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

4A-1. Does the CoC systematically provide Yes information to provider staff about mainstream benefits, including up-to-date resources on eligibility and program changes that can affect homeless clients?

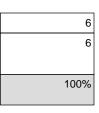
4A-2. Based on the CoC's FY 2016 new and renewal project applications, what percentage of projects have demonstrated they are assisting project participants to obtain mainstream benefits? This includes all of the following within each project: transportation assistance, use of a single application, annual follow-ups with participants, and SOAR-trained staff technical assistance to obtain SSI/SSDI?

### **FY 2016 Assistance with Mainstream Benefits**

Total number of project applications in the FY 2016 competition (new and renewal):

Total number of renewal and new project applications that demonstrate assistance to project participants to obtain mainstream benefits (i.e. In a Renewal Project Application, "Yes" is selected for Questions 2a, 2b and 2c on Screen 4A. In a New Project Application, "Yes" is selected for Questions 5a, 5b, 5c, 6, and 6a on Screen 4A).

Percentage of renewal and new project applications in the FY 2016 competition that have demonstrated assistance to project participants to obtain mainstream benefits:



4A-3. List the organizations (public, private, non-profit and other) that you collaborate with to facilitate health insurance enrollment, (e.g., Medicaid, Medicare, Affordable Care Act options) for program participants. For each organization you partner with, detail the specific outcomes resulting from the partnership in the establishment of benefits. (limit 1000 characters)

The Yolo CoC is located in California, which is a Medicaid expansion state. In Yolo, the County Health and Human Services Agency is the entity responsible for Medicaid enrollment. The County contracts with multiple non-profit providers (including the Yolo Children's Alliance, Center for Families, United Christian Centers and RISE, Inc.) to complete enrollments with low-income individuals in the community through outreach. The County also works with local health care providers (CommuniCare, Elica Health Centers, and the local hospitals) to ensure that all eligible patients are enrolled.

FY2016 CoC Application	Page 55	09/07/2016
------------------------	---------	------------

# 4A-4. What are the primary ways the CoC ensures that program participants with health insurance are able to effectively utilize the healthcare benefits available to them?

Educational materials:	X
In-Person Trainings:	Х
Transportation to medical appointments:	X
Bridge to Health and Housing project employs case managers who respond 24/7 to the local emergency rooms when a frequent ER utilizer experiencing homelessness is admitted. The case managers work with frequent ER utilizers to connect with a primary care physician and avoid future ER visits.	X
Elica Health Centers provides a backpack medicine program, in which a doctor, case manager and formerly homeless individual conduct street outreach to the homeless in the evening. The focus of the program is on addressing physical health conditions.	X
Case managers in all local programs connect clients with healthcare services and work to ensure that each person experiencing homelessness is connected with a primary care physician.	X
Not Applicable or None:	

### 4B. Additional Policies

### Instructions:

For guidance on completing this form, please reference the FY 2016 CoC Application Detailed Instructions and the FY 2016 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

4B-1. Based on the CoCs FY 2016 new and renewal project applications, what percentage of Permanent Housing (PSH and RRH), Transitional Housing (TH), and SSO (non-Coordinated Entry) projects in the CoC are low barrier?

### FY 2016 Low Barrier Designation

Total number of PH (PSH and RRH), TH and non-Coordinated Entry SSO project applications in the FY 2016 competition (new and renewal):	6
Total number of PH (PSH and RRH), TH and non-Coordinated Entry SSO renewal and new project applications that selected "low barrier" in the FY 2016 competition:	6
Percentage of PH (PSH and RRH), TH and non-Coordinated Entry SSO renewal and new project applications in the FY 2016 competition that will be designated as "low barrier":	100%

4B-2. What percentage of CoC Program-funded Permanent Supportive Housing (PSH), Rapid Re-Housing (RRH), SSO (non-Coordinated Entry) and Transitional Housing (TH) FY 2016 Projects have adopted a Housing First approach, meaning that the project quickly houses clients without preconditions or service participation requirements?

### FY 2016 Projects Housing First Designation

Total number of PSH, RRH, non-Coordinated Entry SSO, and TH project applications in the FY 2016 competition (new and renewal):	6
Total number of PSH, RRH, non-Coordinated Entry SSO, and TH renewal and new project applications that selected Housing First in the FY 2016 competition:	6
Percentage of PSH, RRH, non-Coordinated Entry SSO, and TH renewal and new project applications in the FY 2016 competition that will be designated as Housing First:	100%

4B-3. What has the CoC done to ensure awareness of and access to housing and supportive services within the CoC's geographic area to persons that could benefit from CoC-funded programs but are not currently participating in a CoC funded program? In particular, how does the CoC reach out to for persons that are least likely to request housing or services in the absence of special outreach?

Direct outreach and marketing:		
	X	

	1	
FY2016 CoC Application	Page 57	09/07/2016
1 12010 COC /\ppiloation	l age or	03/01/2010

Use of phone or internet-based services like 211:	X
Marketing in languages commonly spoken in the community:	X
Making physical and virtual locations accessible to those with disabilities:	х
Routinely offering program orientations	X
Outreach at community events (such as health fairs and veteran stand downs)	X
Case managers educate clients regarding other programs they may be eligible to receive assistance from	х
Not applicable:	

### 4B-4. Compare the number of RRH units available to serve populations from the 2015 and 2016 HIC.

	2015	2016	Difference
RRH units available to serve all populations in the HIC:	7	1	-6

4B-5. Are any new proposed project No applications requesting \$200,000 or more in funding for housing rehabilitation or new construction?

4B-6. If "Yes" in Questions 4B-5, then describe the activities that the project(s) will undertake to ensure that employment, training and other economic opportunities are directed to low or very low income persons to comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (Section 3) and HUD's implementing rules at 24 CFR part 135?

(limit 1000 characters)

Not applicable.

4B-7. Is the CoC requesting to designate one or more of its SSO or TH projects to serve families with children and youth defined as homeless under other Federal statutes?

### 4B-7a. If "Yes", to question 4B-7, describe how the use of grant funds to serve such persons is of equal or greater priority than serving persons

FY2016 CoC Application	Page 58	09/07/2016
------------------------	---------	------------

defined as homeless in accordance with 24 CFR 578.89. Description must include whether or not this is listed as a priority in the Consolidated Plan(s) and its CoC strategic plan goals. CoCs must attach the list of projects that would be serving this population (up to 10 percent of CoC total award) and the applicable portions of the Consolidated Plan. (limit 2500 characters)

Not applicable.

4B-8. Has the project been affected by a major disaster, as declared by the President Obama under Title IV of the Robert T. Stafford Disaster Relief and Emergency Assistanct Act, as amended (Public Law 93-288) in the 12 months prior to the opening of the FY 2016 CoC Program Competition?

4B-8a. If "Yes" in Question 4B-8, describe the impact of the natural disaster on specific projects in the CoC and how this affected the CoC's ability to address homelessness and provide the necessary reporting to HUD.

(limit 1500 characters)

Not applicable.

4B-9. Did the CoC or any of its CoC program Yes recipients/subrecipients request technical assistance from HUD since the submission of the FY 2015 application? This response does not affect the scoring of this application.

### 4B-9a. If "Yes" to Question 4B-9, check the box(es) for which technical assistance was requested.

This response does not affect the scoring of this application.

CoC Governance:	
CoC Systems Performance Measurement:	
Coordinated Entry:	
Data reporting and data analysis:	
HMIS:	

FY2016 CoC Application	Page 59	09/07/2016
1 120 to 000 Application	i age oo	03/01/2010

Homeless subpopulations targeted by Opening Doors: veterans, chronic, children and families, and unaccompanied youth:	
Maximizing the use of mainstream resources:	
Retooling transitional housing:	X
Rapid re-housing:	
Under-performing program recipient, subrecipient or project:	
Not applicable:	

4B-9b. Indicate the type(s) of Technical Aassistance that was provided, using the categories listed in 4B-9a, provide the month and year the CoC Program recipient or sub-recipient received the assistance and the value of the Technical Assistance to the CoC/recipient/sub recipient involved given the local conditions at the time, with 5 being the highest value and a 1 indicating no value.

Type of Technical Assistance Received	Date Received	Rate the Value of the Technical Assistance

### 4C. 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	CA-521- Evidence	09/07/2016
02. 2016 CoC Consolidated Application: Public Posting Evidence	Yes		
03. CoC Rating and Review Procedure (e.g. RFP)	Yes	CA-521- Rating an	09/07/2016
04. CoC's Rating and Review Procedure: Public Posting Evidence	Yes	CA-521-Rating and	08/31/2016
05. CoCs Process for Reallocating	Yes	CA-521-CoCs Proce	09/07/2016
06. CoC's Governance Charter	Yes	CA-521-CoC's Gove	09/01/2016
07. HMIS Policy and Procedures Manual	Yes	CA-521-HMIS Polic	09/01/2016
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	CA-521 PHA Admini	09/07/2016
10. CoC-HMIS MOU (if referenced in the CoC's Goverance Charter)	No	CA-521CoC-HMIS MO	09/01/2016
11. CoC Written Standards for Order of Priority	No	CA-521-CoC Writte	09/01/2016
12. Project List to Serve Persons Defined as Homeless under Other Federal Statutes (if applicable)	No		
13. HDX-system Performance Measures	Yes	CA-521-HDX-System	09/01/2016
14. Other	No	CA-521-Other CoC	09/01/2016
15. Other	No		

1 12010 000 1 1 1 1 1 1 1 1 1 1 1 1 1 1		FY2016 CoC Application	Page 61	09/07/2016
---	--	------------------------	---------	------------

### **Attachment Details**

**Document Description:** CA-521- Evidence of CoC's Communication to

Rejected Participants

### **Attachment Details**

**Document Description:** 

### **Attachment Details**

**Document Description:** CA-521- Rating and Review Procedure

### **Attachment Details**

**Document Description:** CA-521-Rating and Review Procedure: Public

Posting Evidence

### **Attachment Details**

**Document Description:** CA-521-CoCs Process for Reallocating

### **Attachment Details**

FY2016 CoC Application	Page 62	09/07/2016
------------------------	---------	------------

**Document Description:** CA-521-CoC's Governance Charter

### **Attachment Details**

**Document Description:** CA-521-HMIS Policy and Procedures Manual

### **Attachment Details**

**Document Description:** 

### **Attachment Details**

**Document Description:** CA-521 PHA Administration Plan

### **Attachment Details**

**Document Description:** CA-521CoC-HMIS MOU (if referenced in the

CoC's Governance Charter)

### **Attachment Details**

Document Description: CA-521-CoC Written Standards for Order of

**Priority** 

FY2016 CoC Application	Page 63	09/07/2016
=	1 9	0.0,0.,=0.0

### **Attachment Details**

**Document Description:** 

### **Attachment Details**

**Document Description:** CA-521-HDX-System Performance Measures

### **Attachment Details**

**Document Description:** CA-521-Other CoC Polices and Procedures

Manual

### **Attachment Details**

**Document Description:** 

### **Submission Summary**

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

Page	Last U	Last Updated		
1A. Identification	08/12	08/12/2016		
1B. CoC Engagement	Please Complete			
1C. Coordination	08/31/2016			
FY2016 CoC Application	Page 65	09/07/2016		

1D. CoC Discharge Planning	08/12/2016	
1E. Coordinated Assessment	pordinated Assessment 08/30/2016	
1F. Project Review	t Review Please Complete	
1G. Addressing Project Capacity	08/30/2016	
2A. HMIS Implementation	09/01/2016	
2B. HMIS Funding Sources	09/07/2016	
2C. HMIS Beds	09/07/2016	
2D. HMIS Data Quality	08/30/2016	
2E. Sheltered PIT	09/07/2016	
2F. Sheltered Data - Methods	09/07/2016	
2G. Sheltered Data - Quality	08/30/2016	
2H. Unsheltered PIT	09/07/2016	
2I. Unsheltered Data - Methods	08/30/2016	
2J. Unsheltered Data - Quality	08/30/2016	
3A. System Performance	09/06/2016	
<b>3B. Objective 1</b> 09/06/2016		
3B. Objective 2	Please Complete	
3B. Objective 3	09/07/2016	
4A. Benefits	09/06/2016	
4B. Additional Policies	ditional Policies 09/01/2016	
4C. Attachments	tachments Please Complete	
Submission Summary	No Input Required	

FY2016 CoC Application	Dogo 66	00/07/2016
FY2016 CoC Application	Page 66	09/07/2016



Davis/Woodland/Yolo County Continuum of Care (CA-521)

The CA-521 Davis/Woodland/Yolo County CoC did not reject any projects in the FY 2016 Continuum of Care Competition.



### FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016

#### PROJECT SELECTION SUBCOMMITTEE

During the FY 2016 CoC competition HPAC will establish an objective Project Selection Subcommittee to develop a recommendation regarding which project applications should be sent to HUD for funding in the FY16 CoC competition. The Subcommittee will include:

- Representatives from non-conflicted CoC member agencies and stakeholders
- A minimum of 5 members, maximum of 10 members
- Membership representing both public and private agencies
- Membership representing all geographic areas within the HPAC jurisdiction
- No more than one representative from each member agency

The Homeless Coordinator will act as staff to committee, but will not participate in ranking or voting.

#### PROJECT REALLOCATION, RANKING AND SELECTION PROCEDURE

#### **SUBMISSION OF PROJECT APPLICATIONS**

All project applications must be submitted in e-snaps by August 15, 2016 at 12:00pm.

- Applications received late, but within 8 hours of the due date/time will receive a 5-point score reduction.
- Projects received after 11:59pm on 8/15/16 may receive an additional point reduction, to be determined by the Ranking Subcommittee.
- It is recommended that applicants take a screenshot of their Submissions List and Project Summaries after submitting. In the event that the e-snaps system has issues, this can be used as evidence that the project was submitted on-time.
- If an applicant is having issues with submitting the application in e-snaps by the deadline due to system error they may submit a PDF version of the application, along with evidence that the e-snaps system was not working.

In addition to the application in e-snaps, project applicants may submit a supplementary response (no longer than 5 pages) directly to the Homeless Coordinator to address any areas where they believe members of the Project Selection Subcommittee may require additional information or explanations. These responses will be distributed to Subcommittee members along with the project applications.

### **PREPARATION FOR REVIEW PROCESS**

### **Minimum Threshold Review**

**8/15:** Homeless Coordinator conducts a minimal threshold review on new projects to ensure that projects meet minimum requirements as described below. Per guidance from HUD, all renewal projects will be assumed to meet the threshold requirements.

- Project type is eligible for CoC funding
- Project serves CoC service area
- Project meets 25% match requirements
- Project meets HUD project quality threshold (as described on page 24 of the Notice of Funding Availability)



### FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016

If a project does not meet the threshold requirements the Project Selection Subcommittee will be notified. Depending on the severity of the issue, the Subcommittee may reject the project for funding, or work with the applicant on addressing the issue.

### **Distribution of Application Scoring Packets**

**8/16:** Homeless Coordinator prepares and distributes application packets to the members of the Project Selection Subcommittee.

#### **SCORING**

**8/16-8/18:** Members of the Project Selection Subcommittee independently review and score all renewal projects <sup>1</sup> and new projects<sup>2</sup> (out of 75 possible points). Separate scoring sheets will be used for renewal and new projects. Renewal projects that have been in operation for less than 1 year, and have not completed an Annual Performance Report (APR), will be scored using the new project rubric.

### REALLOCATION, RANKING AND PROJECT SELECTION

8/19-8/22: Members of the Project Selection Subcommittee meet to complete the following tasks:

- Assign a cumulative score to each new and renewal project
- Consider reallocation of under-performing projects
- Select new projects
- Assign a rank to each project application

Minutes will be recorded at the meeting, provided at the subsequent HPAC meeting with the ranking results, and made available to the public.

#### **Cumulative Scoring of Renewal and New Projects**

The Subcommittee's first task will be to develop a cumulative score for each project by aggregating the scores assigned to each project by each individual member of the Subcommittee.

#### **Reallocation of Under-Performing Projects**

Next, the Subcommittee will consider whether reallocation<sup>3</sup> of under-performing renewal projects is necessary.

• The Subcommittee will recommend reallocation of any projects not meeting a minimum scoring threshold of 45 points (60% of total available points).

• Any new project proposal for a:

- o Permanent supportive housing projects dedicated to chronically homeless
- Rapid re-housing projects
- Supportive Services Only (SSO) projects for coordinated entry
- HMIS project (only HMIS lead can apply)
- Permanent Housing Bonus projects

<sup>&</sup>lt;sup>1</sup> Renewal Projects: Projects currently funded by the CoC program with an expiration date in 2017

<sup>&</sup>lt;sup>2</sup> New Projects:

<sup>&</sup>lt;sup>3</sup> Reallocation: When funds are shifted from an existing renewal project to create new projects



### FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016

- The Subcommittee will recommend development of a Corrective Action Plan for any projects scoring between 45 to 55 points (60-73% of total available points).
  - ✓ Projects recommended for corrective action must develop and share a Corrective Action Plan with HPAC by November 1, 2016. The Homeless Coordinator will assist projects with development of the Plan, and will provide technical assistance as needed. Additionally, HPAC will continually monitor the Plan and provide ongoing assistance with improvement efforts. If project has not demonstrated improvement before FY17 CoC process (as demonstrated by improved score), the project may be recommended for reallocation.

#### **Selection of Renewal and New Projects**

After considering all renewal projects and determining the need for reallocation of under-performing projects the Project Selection Subcommittee will recommend all remaining renewal projects for funding in the FY16 CoC competition. After renewals have been reviewed and recommended for funding, the Subcommittee will determine the amount of funding available for new projects using the formula provided below.

STEP 1:		\$458,394	Annual Renewal Demand
	+	\$24,085	Permanent Housing Bonus
	=	\$482,479	Total Available Funds
		4	
STEP 2:		\$482 <i>,</i> 479	Total Available Funds
	-	\$xxx,xxx	Cost of Recommended Renewals
	=	\$xxx,xxx	Balance Available for New Projects

The Subcommittee will review the new project proposals, giving consideration to the score of each project, the geographic disbursement of projects, and whether the project addresses a critical community need that is currently unmet. The Subcommittee will select projects for funding until the available funding runs out. All remaining new projects will be rejected for funding. <sup>4</sup>

#### **Ranking of New and Renewal Projects**

Once the Subcommittee has selected all new and renewal projects that will be recommended for funding, the Subcommittee will assign a rank<sup>5</sup> and tier<sup>6</sup> to each project. Projects will be placed in order from highest to lowest based on cumulative score, and assigned a rank in that order.

TIER 1: \$426,306 93% of Annual Renewal Demand

TIER 2: + \$56,173 7% of Annual Renewal Demand, and Permanent Housing Bonus

\$482,479 Total Available Funding

<sup>&</sup>lt;sup>4</sup> Projects **selected for funding** will be recommended to HUD for funding in the FY16 CoC competition. Projects **rejected for funding** will not be recommended to HUD for funding in the FY16 COC competition.

<sup>&</sup>lt;sup>5</sup> Project Rank: Once selected for funding, all projects must be placed in order of preference or "ranked".

<sup>&</sup>lt;sup>6</sup> **Project Tier:** Once ranked, projects must be placed in two tiers. Projects in tier 1 will be conditionally selected by HUD for funding. Projects in tier 2 will be selected by HUD in order of CoC score and project score until no more funds are available.



### FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016

The Subcommittee retains the right to alter the initial ranking and tier placement for strategic reasons, if initial scoring is likely to result in any critical services gaps, including lack of services in a community or lack of services for a priority population.

### **PUBLIC MEETING AND HPAC ADOPTION**

**8/24:** The Project Selection Subcommittee will bring its final recommendation regarding project reallocation, selection, rejection, and rank/tier to the full HPAC membership at a public meeting on August 24, 2016. The draft recommendation will be posted on the HPAC website and emailed to the membership a minimum of 48-hours prior to the public meeting. The meeting will be publicly advertised on the HPAC website and through a press release to local media organizations. All members of the public and local agencies will be invited to provide public comment during the meeting.

Following public comment, the HPAC membership will make a final determination regarding which projects will be recommended to HUD for funding, and will hold a vote of all non-conflicted member organizations.

#### **NOTIFICATION TO APPLICANTS**

**8/29:** The Homeless Coordinator will send an email to each project applicant explaining whether their project was accepted or rejected. If rejected, the letter will explain the reason for the rejection. If accepted, the letter will explain the rank and tier assignment. In addition, all applicants may request copies of the scoring materials associated with their project, or a debrief with the Homeless Coordinator.

### **SOLO APPLICATIONS TO HUD**

Eligible project applicants that attempted to participate in the CoC planning process in the CA-521 Davis/Woodland/Yolo County Continuum of Care, that believe they were denied the right to participate in a reasonable manner may submit an application to HUD and may be awarded a grant from HUD by following the procedure found in 24 CFR 578.35. Solo applicants must submit their project application to HUD by 7:59:59 p.m. eastern time, September 14, 2016 which must include notification of rejection of the project in the local competition as attachment to the Solo Application's project application.



### FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016

Yolo CoC Scoring Rubric: Renewal Projects			
PROGRAM DESIGN			
Type of Project	Does the type of project (PSH, RRH, TH, SSO, HMIS) meet HUD priorities and demonstrate the ability to meet a local community need?	10	10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Low Barriers	Does the project plan to operate using a low barriers model, by minimizing service participation requirements and preconditions (meaning that they do not screen out potential participants based on clients possessing (1) too little income, (2) active or history of substance use, (3) criminal record, with exception of state mandated restrictions, and (4) history of domestic violence)?	10	10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Serving Priority Populations	If PSH, does project serve exclusively the chronically homeless <sup>7</sup> , or prioritize the chronically homeless for beds as they turn over?	5	5 Pts: Prioritizes chronically homeless with bed turnover 3Pts: Demonstrates in recent APR that a minimum of 50% of clients were chronically homeless 0 Pts: Does not prioritize chronically homeless
	If not PSH, does the project serve high rates of targeted populations (including veterans, survivors of domestic violence, people with mental illness, people with substance use disorder, unaccompanied minors and/or transition aged-youth)?		Consider rates of each population served according to HMIS data. Also consider plan for outreach and engagement with priority populations.  5 Pts: Excellent 4Pts: Strong 3Pts: Fair 2 Pts: Needs Work 1 Pts: Poor 0 Pts: Terrible
			Points Sub-Total: 25

**PROGRAM PERFORMANCE** (Answers should be based on FY 15/16 HMIS data)

<sup>&</sup>lt;sup>7</sup> A person or household who is "chronically homeless" according to HUD includes an unaccompanied homeless individual with a disabling condition who has either (1) been homeless continuously for a year or more, or (2) has had at least four episodes of homelessness in the past three years. A disabling condition may include (1) a diagnosis of substance use disorder, (2) a serious mental illness, (3) a development disability, (4) a chronic physical illness, and (5) the co-occurrence of two or more of the previously mentioned conditions.



# FY 2016 Continuum of Care (CoC) Competition

Project Reallocation, Ranking and Selection Process
Adopted August 9, 2016

	<u> </u>	Auopi	ea August 9, 2016
Housing Stability and Exits	If permanent supportive housing, do at least 80% of participants remain housed or exit to another permanent housing destination?  If transitional housing, do at least 80% of homeless persons exit to permanent housing?	10	Consider HMIS data, as compared to other local projects. May also consider supplemental responses from applicant regarding performance issues, Yolo County housing market, affordable housing availability and local vacancy rates.  10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Income	Does project demonstrate that at least 20% of participants experience an increase in financial resources at project exit, or from project entry to end of period measured?	10	Consider HMIS data, as compared to other local projects. May also consider supplemental responses from applicant regarding performance issues.  10 Pts: Excellent  8 Pts: Strong  6 Pts: Fair  4 Pts: Needs Work  2 Pts: Poor  0 Pts: Terrible
Mainstream Benefits	Does the project demonstrate success in connecting participants with and ensuring participants mainstream resources (including Food Stamps, General Assistance, SSI, TANF, Unemployment, Veterans Benefits, Veterans Healthcare and Workforce Investment Act)?	10	Consider HMIS data, as compared to other local projects. May also consider supplemental responses from applicant regarding performance issues.  10 Pts: Excellent  8 Pts: Strong  6 Pts: Fair  4 Pts: Needs Work  2 Pts: Poor  0 Pts: Terrible
Bed Utilization	Does the project routinely operate at 85% capacity according to quarterly bed utilization reports from previous funding year?	5	Consider HMIS data, as compared to other local projects. May also consider supplemental responses from applicant regarding performance issues. 5 Pts: Excellent 4Pts: Strong 3Pts: Fair 2 Pts: Needs Work 1 Pts: Poor 0 Pts: Terrible
CDANT MANAGE	CRACALT (20 Delinte)		Points Sub-Total: 35
HPAC	EMENT (20 Points)	10	Consider HPAC participation levels and supplemental
Participation	Did agency (or sub recipient) staff participate in HPAC meetings (all HPAC and technical) and HPAC subcommittees during the past year? If new to the community, has the agency demonstrated a	10	responses. 10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work



## FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016

commitment to HPAC participation and partner engagement in the

future?

2 Pts: Poor 0 Pts: Terrible

Drawdown
Rates and Fund
Utilization

In the previous funding year, did the project draw down at least 95% of funds within 90 days of the project's expiration date? (determined using supplemental information from HUD)

**5** Consider data from HUD. Also consider supplemental responses from applicant regarding any performance

issues.

5 Pts: Excellent 4Pts: Strong 3Pts: Fair

2 Pts: Needs Work 1 Pts: Poor 0 Pts: Terrible

Points Sub-Total: 15

**TOTAL AVAILABLE POINTS: 75** 



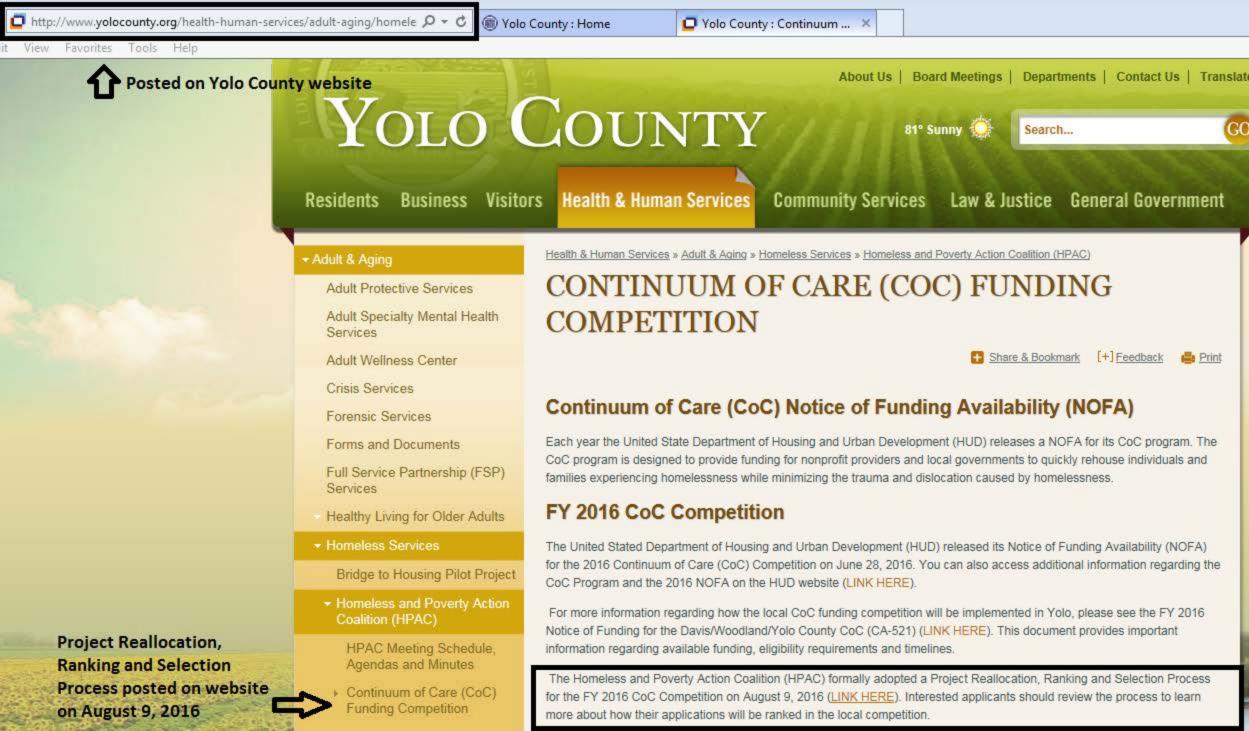
	Yolo CoC Scoring	Rubr	ric: New Projects
PROGRAM DES			
Type of Project	Does the type of project (PSH, RRH, TH, SSO, HMIS) meet HUD priorities and demonstrate the ability to meet a local community need?	10	10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Low Barriers	Does the project plan to operate using a low barriers model, by minimizing service participation requirements and preconditions (meaning that they do not screen out potential participants based on clients possessing (1) too little income, (2) active or history of substance use, (3) criminal record, with exception of state mandated restrictions, and (4) history of domestic violence)?	10	10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Serving Priority Populations	If PSH, will project serve exclusively the chronically homeless, or prioritize the chronically homeless for beds as they turn over?  If not PSH, will the project serve high rates of targeted populations (including veterans, survivors of domestic violence, people with mental illness, people with substance use disorder, unaccompanied minors and/or transition aged-youth)?		5 Pts: Serves exclusively chronically homeless 3Pts: Prioritizes chronically homeless with bed turnover 0 Pts: Does not prioritize chronically homeless  Consider rates of each population served according to HMIS data. Also consider plan for outreach and engagement with priority populations. 5 Pts: Excellent 4Pts: Strong 3Pts: Fair 2 Pts: Needs Work 1 Pts: Poor 0 Pts: Terrible
			Points Sub-Total: 25
PROGRAM PEI			
Housing Stability and Exits	If permanent supportive housing, how does the project plan to retain participants or ensure that they exit to permanent housing?  HUD Standard: 80% of participants	10	Consider the information provided in the application to determine the likelihood that the project will meet the HUD standard:  10 Pts: Excellent 8 Pts: Strong
	remain housed or exit to another permanent housing destination		6 Pts: Fair



		.aopt	cu August 5, 2010
	If rapid re-housing, how does the project plan to rapidly move participants into permanent housing?  HUD Standard: 80% of participants remain housed or exit to permanent housing		4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Income	How does the project plan to increase income for participants? HUD Standard: At least 20% of participants experience an increase in financial resources at project exit, or from project entry to end of period measured	10	Consider the information provided in the application to determine the likelihood that the project will meet the HUD standard:  10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Mainstream Benefits	How does the project plan to assist participants in accessing mainstream benefits (including Food Stamps, General Assistance, SSI, TANF, Unemployment, Veterans Benefits, Veterans Healthcare and Workforce Investment Act)?  HUD Standard: At least 20% of participants experience an increase in financial resources at project exit, or from project entry to end of period measured	10	Consider the information provided in the application to determine the likelihood that the project will meet the HUD standard:  10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Bed Utilization	How does the project plan to quickly fill vacancies?  HUD Standard: Projects operate at 85% capacity	5	Consider the information provided in the application to determine the likelihood that the project will meet the HUD standard:  5 Pts: Excellent 4Pts: Strong 3Pts: Fair 2 Pts: Needs Work 1 Pts: Poor
			0 Pts: Terrible



HPAC Participation	Did agency (or sub recipient) staff participate in HPAC meetings (all HPAC and technical) and HPAC subcommittees during the past year? If new to the community, has the agency demonstrated a commitment to HPAC participation and partner engagement in the future?	10	Consider HPAC participation levels and supplemental responses.  10 Pts: Excellent  8 Pts: Strong  6 Pts: Fair  4 Pts: Needs Work  2 Pts: Poor  0 Pts: Terrible
Experience & Readiness	Does the applicant have experience with managing similar projects and with successful grant administration for federal funds? Will the project be able to begin drawing funds in a timely manner?	5	5 Pts: Excellent 4Pts: Strong 3Pts: Fair 2 Pts: Needs Work 1 Pts: Poor 0 Pts: Terrible
			Points Sub-Total: 75
			TOTAL AVAILABLE POINTS: 75





County of Yolo website



### Yolo County Homeless and Poverty Action Coalition (HPAC)

FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016



### PROJECT SELECTION SUBCOMMITTEE

During the FY 2016 CoC competition HPAC will establish an objective Project Selection Subcommittee to develop a recommendation regarding which project applications should be sent to HUD for funding in the FY16 CoC competition. The Subcommittee will include:

- Representatives from non-conflicted CoC member agencies and stakeholders
- A minimum of 5 members, maximum of 10 members
- Membership representing both public and private agencies
- Membership representing all geographic areas within the HPAC jurisdiction
- No more than one representative from each member agency

The Homeless Coordinator will act as staff to committee, but will not participate in ranking or voting.

#### PROJECT REALLOCATION, RANKING AND SELECTION PROCEDURE

#### SUBMISSION OF PROJECT APPLICATIONS

All project applications must be submitted in e-snaps by August 15, 2016 at 12:00pm.

- Applications received late, but within 8 hours of the due date/time will receive a 5-point score reduction.
- Projects received after 11:59 pm on 8/15/16 may receive an additional point reduction, to be determined by the Ranking Subcommittee.
- It is recommended that applicants take a screenshot of their Submissions List and Project Summaries after submitting. In the event that the e-snaps system has issues, this can be used as evidence that the project was submitted on-time.
- If an applicant is having issues with submitting the application in e-snaps by the deadline due to system error they may submit a PDF version of the application, along with evidence that the e-snaps system was

In addition to the application in e-snaps, project applicants may submit a supplementary response (no longer than 5 pages) directly to the Homeless Coordinator to address any areas where they believe members of the Project Selection Subcommittee may require additional information or explanations. These responses will be distributed to Subcommittee members along with the project applications.

#### PREPARATION FOR REVIEW PROCESS

#### Minimum Threshold Review

8/15: Homeless Coordinator conducts a minimal threshold review on new projects to ensure that projects meet minimum requirements as described below. Per guidance from HUD, all renewal projects will be assumed to meet the threshold requirements.

- · Project type is eligible for CoC funding
- Project serves CoC service area
- Project meets 25% match requirements
- Project meets HUD project quality threshold (as described on page 24 of the Notice of Funding Availability)

Project Reallocation, Ranking and Selection Process posted on Yolo County website

FW: EMAIL VOTE- Adoption of CoC Project Reallocation, Ranking and Selection Process for FY 2016



From: Tracey Dickinson

Sent: Wednesday, August 10, 2016 11:06 AM

Final Project Reallocation, Ranking and Selection Process sent to full CoC body (AKA, HPAC) on August 10, 2016

10: acasumo@ycn.ca.gov; Aurienne Heinig (AHeinig@cityofdavis.org) <AHeinig@cityofdavis.org>; Amanda Ekman @cws.state.ca.us>; ameyer@lsnc.net; Anna Darzins (adarzins@elicahealth.org) <adarzins@elicahealth.org>; Anna Sutton <Anna.Sutton@yolocounty.org>; apickens@fourthandhope.org; bbettis@voa-ncnn.org; Bill Pride <billpride-dcm@sbcglobal.net>; bob@srceh.org; Bobbi Vaughn (communications@davischamber.com) <communications@davischamber.com>; bobbies@communicarehc.org; Cass Sylvia <Cass.Sylvia@yolocounty.org>; celina@empoweryolo.org; Christopher Bulkeley@yolocounty.org>; Collis, Louise < Curtis Hodge</li>< Curtis Hodge</li></l></l></l> dan.sokolow@cityofwoodland.org; daniel.maguire@cityofwinters.org; Davis Chamber <ceo@davischamber.com>; Deanna Lynn-Steele@yolocounty.org>; DFoster@cityofdavis.org; dzeck@fourthandhope.org; Elaine Lytle <Elaine.Lytle@yolocounty.org>; Eliana Argueta (ElianaA@communicarehc.org) <ElianaA@communicarehc.org) <ecassin@elicahealth.org) <ecassin@elicahealth.org>; Emily Kochly@yolocounty.org>; gcardenas@wjusd.org; Ginger Hashimoto <Ginger.Hashimoto@yolocounty.org>; Hannah Gray (Hannah.gray@cityofwoodland.org) <Hannah.gray@cityofwoodland.org>; Hazaiah Williams (hwilliams@elicahealth.org) <hwilliams@elicahealth.org>; housing@y3c.org; housingnow@y3c.org; iperez@ych.ca.gov; Janice Critchlow@sbcglobal.net>; Jayne Williams (jayne@almsinyolo.org) <jayne@almsinyolo.org); jeneba Lahai <Jeneba.Lahai@yolocounty.org>; jessica.larsen@ycoe.org; jfox@voa-ncnn.org; jholt@ych.ca.gov; Joan Beesley@yolocounty.org>; Julie Freitas <Julie.Freitas@yolocounty.org>; Karen Larsen@ycoe.org; jfox@voa-ncnn.org; jholt@ych.ca.gov; Joan Beesley@yolocounty.org>; Julie Freitas <Julie.Freitas@yolocounty.org>; karen@yolofoodbank.org; Katie Villegas < Katie. Villegas@yolocounty.org >; Katy Zane (kzane@steac.org) < kzane@steac.org >; lbaker@ych.ca.gov; Ligayah@cimcinc.com; Lynnette@empoweryolo.org; main@y3c.org; Mark Sawyer (marks@cityofwestsacramento.org) <marks@cityofwestsacramento.org>; mfjlaw@gmail.com; Nancy Mills <nanci.mills@cityofwinters.org>; Niomi Michel <nmichel@yolofrc.org>; Nolan Sullivan <Nolan.Sullivan@yolocounty.org>; pastor.ross@yahoo.com; Phaicia Chow (hnassist@y3c.org) < hnassist@y3c.org); rachel@mutualhousing.com; Reed.Walker@va.gov; Robin Frank < Robin.Frank@yolocounty.org>; Rosie.Caraveo@wjusd.org; Ryan Collins (rcollins@elicahealth.org) <rcollins@elicahealth.org); Ryann Esteban <ryann.esteban@va.gov>; Sadie Shen <sadieshen@tpcp.org>; SalaamShabazz@tpcp.org; Sandra Sigrist <Sandra.Sigrist@yolocounty.org>; Sara Gavin (SaraG@communicarehc.org) <SaraG@communicarehc.org>; Scott Love <Scott.Love@yolocounty.org>; Scott Thurmond (thurmondconsulting@gmail.com) <thurmondconsulting@gmail.com>; SergeiShkurkin@UCCenters.org; StephanieS@communicarehc.org; Steve Kruse (skruse@elicahealth.org) <skruse@elicahealth.org) <skruse@elicahealth.org); Susan Hensley@yolocounty.org>; tico@riseservices.org; TinaL@communicarehc.org; Tracey Dickinson <Tracey.Dickinson@yolocounty.org>; Victoria Lewis <Victoria.Lewis@yolocounty.org>

Subject: FW: EMAIL VOTE- Adoption of CoC Project Reallocation, Ranking and Selection Process for FY 2016

Hello HPAC,

Thank you for all your comments and emails. The attached was officially adopted by HPAC on 8/9/16. I still need a few more volunteers to participate on the Project Selection Subcommittee. This would involve making a few hours to review and rank project proposals next week, and a 2-hour meeting towards the end of the week. Please contact me directly if you are interested!

Thanks everyone.

### Tracey Dickinson

Homeless Program Coordinator Yolo County Health and Human Services Agency

Office: (530)666-8559 Cell: (530)650-5870



### FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016

#### PROJECT SELECTION SUBCOMMITTEE

During the FY 2016 CoC competition HPAC will establish an objective Project Selection Subcommittee to develop a recommendation regarding which project applications should be sent to HUD for funding in the FY16 CoC competition. The Subcommittee will include:

- Representatives from non-conflicted CoC member agencies and stakeholders
- A minimum of 5 members, maximum of 10 members
- Membership representing both public and private agencies
- Membership representing all geographic areas within the HPAC jurisdiction
- No more than one representative from each member agency

The Homeless Coordinator will act as staff to committee, but will not participate in ranking or voting.

#### PROJECT REALLOCATION, RANKING AND SELECTION PROCEDURE

#### **SUBMISSION OF PROJECT APPLICATIONS**

All project applications must be submitted in e-snaps by August 15, 2016 at 12:00pm.

- Applications received late, but within 8 hours of the due date/time will receive a 5-point score reduction.
- Projects received after 11:59pm on 8/15/16 may receive an additional point reduction, to be determined by the Ranking Subcommittee.
- It is recommended that applicants take a screenshot of their Submissions List and Project Summaries after submitting. In the event that the e-snaps system has issues, this can be used as evidence that the project was submitted on-time.
- If an applicant is having issues with submitting the application in e-snaps by the deadline due to system error they may submit a PDF version of the application, along with evidence that the e-snaps system was not working.

In addition to the application in e-snaps, project applicants may submit a supplementary response (no longer than 5 pages) directly to the Homeless Coordinator to address any areas where they believe members of the Project Selection Subcommittee may require additional information or explanations. These responses will be distributed to Subcommittee members along with the project applications.

#### **PREPARATION FOR REVIEW PROCESS**

#### **Minimum Threshold Review**

**8/15:** Homeless Coordinator conducts a minimal threshold review on new projects to ensure that projects meet minimum requirements as described below. Per guidance from HUD, all renewal projects will be assumed to meet the threshold requirements.

- Project type is eligible for CoC funding
- Project serves CoC service area
- Project meets 25% match requirements
- Project meets HUD project quality threshold (as described on page 24 of the Notice of Funding Availability)



### FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016

If a project does not meet the threshold requirements the Project Selection Subcommittee will be notified. Depending on the severity of the issue, the Subcommittee may reject the project for funding, or work with the applicant on addressing the issue.

#### **Distribution of Application Scoring Packets**

**8/16:** Homeless Coordinator prepares and distributes application packets to the members of the Project Selection Subcommittee.

#### **SCORING**

**8/16-8/18:** Members of the Project Selection Subcommittee independently review and score all renewal projects <sup>1</sup> and new projects<sup>2</sup> (out of 75 possible points). Separate scoring sheets will be used for renewal and new projects. Renewal projects that have been in operation for less than 1 year, and have not completed an Annual Performance Report (APR), will be scored using the new project rubric.

#### REALLOCATION, RANKING AND PROJECT SELECTION

8/19-8/22: Members of the Project Selection Subcommittee meet to complete the following tasks:

- Assign a cumulative score to each new and renewal project
- Consider reallocation of under-performing projects
- Select new projects
- Assign a rank to each project application

Minutes will be recorded at the meeting, provided at the subsequent HPAC meeting with the ranking results, and made available to the public.

#### **Cumulative Scoring of Renewal and New Projects**

The Subcommittee's first task will be to develop a cumulative score for each project by aggregating the scores assigned to each project by each individual member of the Subcommittee.

#### **Reallocation of Under-Performing Projects**

Next, the Subcommittee will consider whether reallocation<sup>3</sup> of under-performing renewal projects is necessary.

• The Subcommittee will recommend reallocation of any projects not meeting a minimum scoring threshold of 45 points (60% of total available points).

• Any new project proposal for a:

- o Permanent supportive housing projects dedicated to chronically homeless
- Rapid re-housing projects
- Supportive Services Only (SSO) projects for coordinated entry
- o HMIS project (only HMIS lead can apply)
- Permanent Housing Bonus projects

<sup>&</sup>lt;sup>1</sup> Renewal Projects: Projects currently funded by the CoC program with an expiration date in 2017

<sup>&</sup>lt;sup>2</sup> New Projects:

<sup>&</sup>lt;sup>3</sup> Reallocation: When funds are shifted from an existing renewal project to create new projects



### FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016

- The Subcommittee will recommend development of a Corrective Action Plan for any projects scoring between 45 to 55 points (60-73% of total available points).
  - ✓ Projects recommended for corrective action must develop and share a Corrective Action Plan with HPAC by November 1, 2016. The Homeless Coordinator will assist projects with development of the Plan, and will provide technical assistance as needed. Additionally, HPAC will continually monitor the Plan and provide ongoing assistance with improvement efforts. If project has not demonstrated improvement before FY17 CoC process (as demonstrated by improved score), the project may be recommended for reallocation.

#### **Selection of Renewal and New Projects**

After considering all renewal projects and determining the need for reallocation of under-performing projects the Project Selection Subcommittee will recommend all remaining renewal projects for funding in the FY16 CoC competition. After renewals have been reviewed and recommended for funding, the Subcommittee will determine the amount of funding available for new projects using the formula provided below.

STEP 1:		\$458,394	Annual Renewal Demand
	+	\$24,085	Permanent Housing Bonus
	=	\$482,479	Total Available Funds
		4	
STEP 2:		\$482 <i>,</i> 479	Total Available Funds
	-	\$xxx,xxx	Cost of Recommended Renewals
	=	\$xxx,xxx	Balance Available for New Projects

The Subcommittee will review the new project proposals, giving consideration to the score of each project, the geographic disbursement of projects, and whether the project addresses a critical community need that is currently unmet. The Subcommittee will select projects for funding until the available funding runs out. All remaining new projects will be rejected for funding. <sup>4</sup>

#### **Ranking of New and Renewal Projects**

Once the Subcommittee has selected all new and renewal projects that will be recommended for funding, the Subcommittee will assign a rank<sup>5</sup> and tier<sup>6</sup> to each project. Projects will be placed in order from highest to lowest based on cumulative score, and assigned a rank in that order.

TIER 1: \$426,306 93% of Annual Renewal Demand

TIER 2: + \$56,173 7% of Annual Renewal Demand, and Permanent Housing Bonus

\$482,479 Total Available Funding

<sup>&</sup>lt;sup>4</sup> Projects **selected for funding** will be recommended to HUD for funding in the FY16 CoC competition. Projects **rejected for funding** will not be recommended to HUD for funding in the FY16 COC competition.

<sup>&</sup>lt;sup>5</sup> Project Rank: Once selected for funding, all projects must be placed in order of preference or "ranked".

<sup>&</sup>lt;sup>6</sup> **Project Tier:** Once ranked, projects must be placed in two tiers. Projects in tier 1 will be conditionally selected by HUD for funding. Projects in tier 2 will be selected by HUD in order of CoC score and project score until no more funds are available.



### FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016

The Subcommittee retains the right to alter the initial ranking and tier placement for strategic reasons, if initial scoring is likely to result in any critical services gaps, including lack of services in a community or lack of services for a priority population.

#### **PUBLIC MEETING AND HPAC ADOPTION**

**8/24:** The Project Selection Subcommittee will bring its final recommendation regarding project reallocation, selection, rejection, and rank/tier to the full HPAC membership at a public meeting on August 24, 2016. The draft recommendation will be posted on the HPAC website and emailed to the membership a minimum of 48-hours prior to the public meeting. The meeting will be publicly advertised on the HPAC website and through a press release to local media organizations. All members of the public and local agencies will be invited to provide public comment during the meeting.

Following public comment, the HPAC membership will make a final determination regarding which projects will be recommended to HUD for funding, and will hold a vote of all non-conflicted member organizations.

#### **NOTIFICATION TO APPLICANTS**

**8/29:** The Homeless Coordinator will send an email to each project applicant explaining whether their project was accepted or rejected. If rejected, the letter will explain the reason for the rejection. If accepted, the letter will explain the rank and tier assignment. In addition, all applicants may request copies of the scoring materials associated with their project, or a debrief with the Homeless Coordinator.

#### **SOLO APPLICATIONS TO HUD**

Eligible project applicants that attempted to participate in the CoC planning process in the CA-521 Davis/Woodland/Yolo County Continuum of Care, that believe they were denied the right to participate in a reasonable manner may submit an application to HUD and may be awarded a grant from HUD by following the procedure found in 24 CFR 578.35. Solo applicants must submit their project application to HUD by 7:59:59 p.m. eastern time, September 14, 2016 which must include notification of rejection of the project in the local competition as attachment to the Solo Application's project application.



## FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016

	Yolo CoC Scoring Rub	ric: R	enewal Projects
PROGRAM DESIG	N		
Type of Project	Does the type of project (PSH, RRH, TH, SSO, HMIS) meet HUD priorities and demonstrate the ability to meet a local community need?	10	10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Low Barriers	Does the project plan to operate using a low barriers model, by minimizing service participation requirements and preconditions (meaning that they do not screen out potential participants based on clients possessing (1) too little income, (2) active or history of substance use, (3) criminal record, with exception of state mandated restrictions, and (4) history of domestic violence)?	10	10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Serving Priority Populations	If PSH, does project serve exclusively the chronically homeless <sup>7</sup> , or prioritize the chronically homeless for beds as they turn over?	5	5 Pts: Prioritizes chronically homeless with bed turnover 3Pts: Demonstrates in recent APR that a minimum of 50% of clients were chronically homeless 0 Pts: Does not prioritize chronically homeless
	If not PSH, does the project serve high rates of targeted populations (including veterans, survivors of domestic violence, people with mental illness, people with substance use disorder, unaccompanied minors and/or transition aged-youth)?		Consider rates of each population served according to HMIS data. Also consider plan for outreach and engagement with priority populations.  5 Pts: Excellent 4Pts: Strong 3Pts: Fair 2 Pts: Needs Work 1 Pts: Poor 0 Pts: Terrible
			Points Sub-Total: 25

**PROGRAM PERFORMANCE** (Answers should be based on FY 15/16 HMIS data)

<sup>&</sup>lt;sup>7</sup> A person or household who is "chronically homeless" according to HUD includes an unaccompanied homeless individual with a disabling condition who has either (1) been homeless continuously for a year or more, or (2) has had at least four episodes of homelessness in the past three years. A disabling condition may include (1) a diagnosis of substance use disorder, (2) a serious mental illness, (3) a development disability, (4) a chronic physical illness, and (5) the co-occurrence of two or more of the previously mentioned conditions.



# FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process

Adopted August 9, 2016

Housing Stability and Exits	If permanent supportive housing, do at least 80% of participants remain housed or exit to another permanent housing destination?  If transitional housing, do at least 80% of homeless persons exit to	10	Consider HMIS data, as compared to other local projects. May also consider supplemental responses from applicant regarding performance issues, Yolo County housing market, affordable housing availability and local vacancy rates.  10 Pts: Excellent  8 Pts: Strong  6 Pts: Fair
	permanent housing?		4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Income	Does project demonstrate that at least 20% of participants experience an increase in financial resources at project exit, or from project entry to end of period measured?	10	Consider HMIS data, as compared to other local projects. May also consider supplemental responses from applicant regarding performance issues.  10 Pts: Excellent  8 Pts: Strong  6 Pts: Fair  4 Pts: Needs Work  2 Pts: Poor  0 Pts: Terrible
Mainstream Benefits	Does the project demonstrate success in connecting participants with and ensuring participants mainstream resources (including Food Stamps, General Assistance, SSI, TANF, Unemployment, Veterans Benefits, Veterans Healthcare and Workforce Investment Act)?	10	Consider HMIS data, as compared to other local projects. May also consider supplemental responses from applicant regarding performance issues.  10 Pts: Excellent  8 Pts: Strong  6 Pts: Fair  4 Pts: Needs Work  2 Pts: Poor  0 Pts: Terrible
Bed Utilization	Does the project routinely operate at 85% capacity according to quarterly bed utilization reports from previous funding year?	5	Consider HMIS data, as compared to other local projects. May also consider supplemental responses from applicant regarding performance issues.  5 Pts: Excellent 4Pts: Strong 3Pts: Fair 2 Pts: Needs Work 1 Pts: Poor 0 Pts: Terrible
CDANT MANAGE	EMENT (20 Points)		Points Sub-Total: 35
HPAC	Did agency (or sub recipient) staff	10	Consider HPAC participation levels and supplemental
Participation	participate in HPAC meetings (all HPAC and technical) and HPAC subcommittees during the past year? If new to the community, has the agency demonstrated a		responses. 10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work



## FY 2016 Continuum of Care (CoC) Competition Project Reallocation, Ranking and Selection Process Adopted August 9, 2016

commitment to HPAC participation and partner engagement in the

future?

2 Pts: Poor 0 Pts: Terrible

Drawdown
Rates and Fund
Utilization

In the previous funding year, did the project draw down at least 95% of funds within 90 days of the project's expiration date? (determined using supplemental information from HUD)

**5** Consider data from HUD. Also consider supplemental responses from applicant regarding any performance

issues.

5 Pts: Excellent 4Pts: Strong 3Pts: Fair

2 Pts: Needs Work 1 Pts: Poor 0 Pts: Terrible

Points Sub-Total: 15

**TOTAL AVAILABLE POINTS: 75** 



	Yolo CoC Scoring	Rubr	ric: New Projects
PROGRAM DES			
Type of Project	Does the type of project (PSH, RRH, TH, SSO, HMIS) meet HUD priorities and demonstrate the ability to meet a local community need?	10	10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Low Barriers	Does the project plan to operate using a low barriers model, by minimizing service participation requirements and preconditions (meaning that they do not screen out potential participants based on clients possessing (1) too little income, (2) active or history of substance use, (3) criminal record, with exception of state mandated restrictions, and (4) history of domestic violence)?	10	10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible
Serving Priority Populations	If PSH, will project serve exclusively the chronically homeless, or prioritize the chronically homeless for beds as they turn over?  If not PSH, will the project serve high rates of targeted populations (including veterans, survivors of domestic violence, people with mental illness, people with substance use disorder, unaccompanied minors and/or transition aged-youth)?		5 Pts: Serves exclusively chronically homeless 3Pts: Prioritizes chronically homeless with bed turnover 0 Pts: Does not prioritize chronically homeless  Consider rates of each population served according to HMIS data. Also consider plan for outreach and engagement with priority populations. 5 Pts: Excellent 4Pts: Strong 3Pts: Fair 2 Pts: Needs Work 1 Pts: Poor 0 Pts: Terrible
			Points Sub-Total: 25
PROGRAM PEI			
Housing Stability and Exits	If permanent supportive housing, how does the project plan to retain participants or ensure that they exit to permanent housing?  HUD Standard: 80% of participants	10	Consider the information provided in the application to determine the likelihood that the project will meet the HUD standard:  10 Pts: Excellent 8 Pts: Strong
	remain housed or exit to another permanent housing destination		6 Pts: Fair



project plan to rapidly move participants into permanent housing?  HUD Standard: 80% of participants remain housed or exit to permanent housing  Income How does the project plan to increase income for participants? HUD Standard: At least 20% of participants experience an increase in financial resources at project exit, or from project entry to end of period mainstream benefits  Mainstream Benefits  Mainstream How does the project plan to assist participants in accessing mainstream benefits (including Food Stamps, General Assistance, SSI, TANF, Unemployment, Veterans Benefits, Veterans Healthcare and Workforce Investment Act)? HUD Standard: At least 20% of participants experience an increase in financial resources at project exit, or from project entry to end of period measured  2 Pts: Poor 0 Pts: Terrible  Consider the information provided in the application to determine the likelihood that the project will meet the HUD standard:  10 Pts: Excellent 8 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible  Consider the information provided in the application to determine the likelihood that the project will meet the HUD standard:  10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible				
increase income for participants?  HUD Standard: At least 20% of participants experience an increase in financial resources at project exit, or from project entry to end of period measured  How does the project plan to assist participants in accessing mainstream benefits (including Food Stamps, General Assistance, SSI, TANF, Unemployment, Veterans Benefits, Veterans Healthcare and Workforce Investment Act)?  HUD Standard: 10 Pts: Excellent  8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible  Consider the information provided in the application to determine the likelihood that the project will meet the HUD standard: 10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor 0 Pts: Terrible  Consider the information provided in the application to determine the likelihood that the project will meet the HUD standard: 10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 9 Pts: Recellent 8 Pts: Strong 6 Pts: Fair 9 Pts: Recellent 8 Pts: Strong 6 Pts: Fair 9 Pts: Recellent 8 Pts: Strong 9 Pts: Fair 9 Pts: Recellent 8 Pts: Strong 9 Pts: Fair 9 Pts: Recellent 9 Pts: Poor 10 Pts: Excellent 9 Pts: Recellent 9 Pts: Strong 9 Pts: Fair 9 Pts: Excellent 9 Pts: Strong 9 Pts: Fair 9 Pts: Excellent 9 Pts: Strong 9 Pts: Fair 9 Pts: Recellent 9 Pts: Strong 9 Pts: Fair 9 Pts: Recellent 9 Pts: Recellent 9 Pts: Strong 9 Pts: Fair 9 Pts: Recellent 9 Pts: Rec		participants into permanent housing? HUD Standard: 80% of participants remain housed or exit to permanent housing		0 Pts: Terrible
Benefits  participants in accessing mainstream benefits (including Food Stamps, General Assistance, SSI, TANF, Unemployment, Veterans Benefits, Veterans Healthcare and Workforce Investment Act)?  HUD Standard: At least 20% of participants experience an increase in financial resources at project exit, or from project entry to end of period measured  Bed Utilization  Bed Utilization  Bed Utilization  How does the project plan to quickly fill vacancies?  HUD Standard: Projects operate at 85% capacity   Source  Consider the information provided in the application to determine the likelihood that the project will meet the HUD standard:  5 Consider the information provided in the application to determine the likelihood that the project will meet the HUD standard:  5 Pts: Excellent  4 Pts: Needs Work  2 Pts: Terrible  5 Consider the information provided in the application to determine the likelihood that the project will meet the HUD standard:  5 Pts: Excellent  4 Pts: Needs Work  4 Pts: Strong  3 Pts: Fair  2 Pts: Needs Work  1 Pts: Poor  0 Pts: Terrible	Income	increase income for participants? HUD Standard: At least 20% of participants experience an increase in financial resources at project exit, or from project entry to end of period	10	determine the likelihood that the project will meet the HUD standard:  10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor
quickly fill vacancies?  HUD Standard: Projects operate at 85% capacity  5 Pts: Excellent 4Pts: Strong 3Pts: Fair 2 Pts: Needs Work 1 Pts: Poor 0 Pts: Terrible  Points Sub-Total: 35	Mainstream Benefits	participants in accessing mainstream benefits (including Food Stamps, General Assistance, SSI, TANF, Unemployment, Veterans Benefits, Veterans Healthcare and Workforce Investment Act)?  HUD Standard: At least 20% of participants experience an increase in financial resources at project exit, or from project entry to end of period	10	determine the likelihood that the project will meet the HUD standard:  10 Pts: Excellent 8 Pts: Strong 6 Pts: Fair 4 Pts: Needs Work 2 Pts: Poor
	Bed Utilization	quickly fill vacancies? HUD Standard: Projects operate at 85%	5	determine the likelihood that the project will meet the HUD standard:  5 Pts: Excellent 4Pts: Strong 3Pts: Fair 2 Pts: Needs Work 1 Pts: Poor 0 Pts: Terrible
GRANT MANAGEMENT				Points Sub-Total: 35
	GRANT MANAG	EMENT		



HPAC Participation	Did agency (or sub recipient) staff participate in HPAC meetings (all HPAC and technical) and HPAC subcommittees during the past year? If new to the community, has the agency demonstrated a commitment to HPAC participation and partner engagement in the future?	10	Consider HPAC participation levels and supplemental responses.  10 Pts: Excellent  8 Pts: Strong  6 Pts: Fair  4 Pts: Needs Work  2 Pts: Poor  0 Pts: Terrible
Experience & Readiness	Does the applicant have experience with managing similar projects and with successful grant administration for federal funds? Will the project be able to begin drawing funds in a timely manner?	5	5 Pts: Excellent 4Pts: Strong 3Pts: Fair 2 Pts: Needs Work 1 Pts: Poor 0 Pts: Terrible
			Points Sub-Total: 75
			TOTAL AVAILABLE POINTS: 75

#### Overview

In accordance with the 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule, this document shall serve as the governance charter for the Davis/Woodland/Yolo County Continuum of Care (CA-521), hereafter known as the Homeless and Poverty Action Coalition (HPAC). The charter includes information regarding HPAC's tenets, membership, meetings, leadership structure, code of conduct, Homeless Management Information System (HMIS) designation, and Collaborative Applicant designation. HPAC's Policies and Procedures Manual contains all other relevant information required by 24 CFR Part 578 Subpart B.

#### **Tenets**

Mission: Provide leadership on homelessness and poverty in Yolo County.

Vision: Create and sustain a comprehensive, coordinated, and balanced array of human services

for homeless and low-income individuals and families within Yolo County.

Coordination: Achieve a synergistic relationship with the Yolo County 10 Year Plan Commission to

achieve all of the goals in the Yolo County 10 Year Plan and to address issues of

homelessness and poverty countywide.

#### Membership

HPAC membership is open to all parties interested in issues of homelessness and poverty in Yolo County. Relevant parties include, but are not limited to nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement agencies, organizations that serve veterans, people experiencing homelessness, and formerly homeless individuals.

HPAC shall invite new members by posting an annual public notice on its website in the month of November, but shall accept new members all year. Interested parties may join at any time, but members who would like to obtain voting rights must complete a membership application and meet the criteria specified in the Board of Voting Members section below.

#### Meetings

HPAC shall convene eight (8) meetings of the full membership each year in rotating locations among Davis, West Sacramento, and Woodland. HPAC shall also establish two subcommittees, including a data subcommittee and a technical subcommittee. HPAC may also convene ad hoc committees on an asneeded basis per the recommendation of the full HPAC body. All meetings and subcommittee meetings shall be open to the public.

**HPAC Full Membership:** Shall meet on eight (8) occasions during the course of the year. Shall focus

on community-wide homeless issues, new requirements from the federal or state government, discussion of best practices, and coordination across providers. All decisions requiring a vote shall be made at meetings of the full

membership.

Data Subcommittee: Shall meet on a quarterly basis, for a total of four (4) meetings each year.

Shall be responsible for monitoring and addressing issues related to the

local HMIS system, and for reviewing any countywide data to be used for public information and/or grant writing purposes.

**Technical Subcommittee:** Shall meet on a quarterly basis, for a total of four (4) meetings each year. Shall focus on federal funding issues pertaining to the Continuum of Care (CoC) and Emergency Solutions Grant (ESG).

The Homeless Coordinator shall create the meeting schedule, in coordination with the HPAC leadership team. The HPAC voting membership shall approve the meeting schedule for the following year at the October meeting.

### Leadership

HPAC leadership shall consist of an elected Chair, Vice-Chair, and Secretary, as well as a Board of Voting Members. The County's Homeless Coordinator shall act as staff to HPAC.

HPAC shall hold elections in October with newly elected officers serving a one (1) year term from November 1 through October 31. If an elected officer needs to vacate the position prior to the expiration of his or her term, HPAC shall convene a special election at the next regularly scheduled general meeting.

Chair:

The Chair shall serve as HPAC's primary spokesperson. The Chair shall facilitate all meetings in accordance with Robert's Rules of Order. The Chair may also convene executive committee meetings prior to general meetings to prepare agendas. The Chair shall provide feedback on the selection and performance of the Homeless Coordinator.

Vice-Chair:

In the Chair's absence, the Vice-Chair shall assume meeting facilitation duties and assist with meeting preparation.

Secretary:

The Secretary shall record minutes and submit them for approval at the following meeting. The Secretary is also responsible for verifying the voting status for eligible members. In the Chair and Vice Chair's absence, the Secretary shall assume meeting facilitation duties and assist with meeting preparation.

**Homeless Coordinator:** 

The Homeless Coordinator shall act as staff to HPAC, and shall be a nonelected and non-voting member of the group. The Coordinator shall staff the body by coordinating all meetings, conducting research and analysis, and presenting findings. A full description of the Coordinator's tasks and responsibility can be found on the County of Yolo website.

Board of Voting Members: In addition to the four positions listed above, HPAC leadership shall also consist of a board of voting members. HPAC shall transact business using majority rule. HPAC may conduct electronic votes when failure to act would prevent or substantially impair HPAC's compliance with governing regulations and/or funding.

To obtain voting rights, a member must attend at least six (6) general meetings and participate on one (1) subcommittee each year. Voting members must also represent one of the following parties:

- Community based organizations whose mission pertains to issues of homelessness and poverty;
- The County of Yolo;

- Cities within the County of Yolo;
- Homeless and/or formerly homeless persons; and
- Private companies whose interests pertain to issues of homelessness and poverty.

In the event that more than one representative from a given agency/government entity regularly participates in HPAC meetings, the agency's leader may delegate one primary voting representative and one secondary representative as the voting member for their agency/government entity. HPAC only authorizes the secondary representative to vote should the primary representative not be present. If no representatives are present, the agency forfeits their vote. Homeless and/or formerly homeless persons can retain their individual voting status.

Other HPAC advisors that shall provide valuable input, but may not necessarily be voting members include:

- Elected officials representing participating jurisdictions; and
- Members of the County of Yolo 10 Year Plan Commission.

#### **Code of Conduct**

HPAC officers and voting board members shall abide by the following stipulations.

Conflict of Interest and Recusal Policy: No HPAC officer or voting board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents. It is the responsibility of HPAC officers and voting board members to recuse themselves from the evaluation and decision-making process when a personal or organizational conflict of interest exists. In addition, HPAC prohibits officers and voting board members from the acceptance of personal gifts that provide benefit in excess of nominal value (less than \$15) from persons, organizations, or corporations with a stake in the outcome of HPAC decisions. As long as the nominal gifts are unsolicited and do not occur more than twice annually, a conflict of interest does not exist.

**Termination Policy:** HPAC reserves the right to temporarily ban or terminate an officer or voting board member who does not comply with the stipulations described above. HPAC must receive majority approval before taking any disciplinary action.

#### Homeless Management Information System (HMIS) Designation

HPAC shall designate Sacramento Steps Forward (SSF) as the region's HMIS System Administrator; Yolo Community Care Continuum (YCCC) as the region's Lead HMIS Agency; and the County of Yolo as the region's HMIS Daily Operator.

**HMIS System Administrator:** As the HMIS System Administrator, SSF will serve as the primary liaison between the HMIS software provider and the partner agencies. SSF will also oversee all technical aspects of HMIS administration including issuing new user accounts and passwords.

HMIS Lead Agency: As the HMIS Lead Agency, YCCC will serve as the primary liaison between the U.S. Department of Housing and Urban Development (HUD) and the partner agencies. YCCC will also manage all HMIS-related invoicing and payment processing.

**HMIS Daily Operator:** As the HMIS Daily Operator, the County of Yolo will serve as the primary liaison between SSF and the partner agencies. The County of Yolo will also convene quarterly users meetings and provide technical support related to HMIS daily usage.

In collaboration with each other, the three agencies shall provide system administration to ensure the viability and success of HMIS.

### **Collaborative Applicant Designation**

HPAC shall annually designate an eligible legal entity to complete HUD's Continuum of Care (CoC) Program application, referred to as the Collaborative Applicant. The Collaborative Applicant is responsible for collecting and submitting the application on behalf of HPAC. The Collaborative Applicant is the only organization eligible to apply for HUD planning funds to support HPAC in carrying out all of its responsibilities. The Collaborative Applicant must seek final approval from HPAC prior to submitting the final CoC Program application.

#### **Provisions to Amend and Ratification**

HPAC, in consultation with the HMIS Lead, the HMIS Daily Operator, and the Collaborative Applicant, shall review, amend as necessary, and re-ratify this governance charter every October upon a majority vote of all members present during the scheduled meeting.

Doug Zeck HPAC Chair



Homeless Management Information System (HMIS) Policies and Procedures Manual

Davis/Woodland/Yolo County Continuum of Care (CA-521) *Adopted August 24, 2016* 

# **Table of Contents**

Overview	3
Introduction	3
What is HMIS	3
Who Uses HMIS	3
Why HMIS is Important	4
Section 1: HMIS Governance Structure	5
HMIS System Administrator	5
Software	5
Technical	5
Privacy and Security	5
HMIS Lead Agency	6
General	6
HMIS Daily Operator	6
General	6
Technical	6
HPAC Data Subcommittee	6
Section 2: General Operating Policies and Procedures	8
How to Add an Agency	8
How to Add a New Project	8
How to Add a User	8
How to Discontinue an Agency	9
How to Discontinue a Project	9
How to Discontinue a User	9
How to Request Technical Assistance	10
How to Request a Merging of Two Records	10
How to Request a Password Reset	10
How to Submit a Data Request	10
Section 3: HMIS Data Quality Plan	
HMIS Data Standards	
Universal Data Elements	12

Program-Specific Data Elements	13
Project Descriptor Data Elements	13
Goals and Benchmarks	14
Timeliness	14
Completeness	15
Bed/Unit Utilization Rates	17
Bed Coverage Rates	18
Service-Volume Coverage Rates	18
Other Important Data Quality Practices	18
Annual Verifications	19
Accuracy	19
Monitoring	19
Monitoring Roles and Responsibilities	19
Monitoring Schedule	20
Section 4: HMIS Privacy and Security Plan	21
HMIS Data and Technical Standards	21
Privacy Statement	21
Consumer Notice	23
List of Participating Agencies	23
Informed Consent and Release of Information Authorization	23
Privacy and Security Safeguards	24
Physical Safeguards	24
Technical Safeguards	24
Disaster Recovery Policy	26
Workforce Security Policy	26
Background Check Policy	26
Monitoring	27
Roles and Responsibilities	27
Security Officers	28
New HMIS Partner Agency Site Security Assessment	29
Semiannual Partner Agency Self-Audits	29
Annual Security Audits	30
Reporting Security Incidents	30

### **Overview**

Pursuant to 24 Code of Federal Regulations (CFR) Parts 91, 576, 580, and 583 Interim Rule<sup>1</sup>, this document shall serve as the Homeless Management Information System (HMIS) Policies and Procedures Manual for the Davis/Woodland/Yolo County Continuum of Care (CA-521), hereafter known as the Homeless and Poverty Action Coalition (HPAC).

As a counterpart to HPAC's Policies and Procedures Manual, this document shall be reviewed, revised, and reratified every October with the general manual and governance charter upon a majority vote of all voting members present during the scheduled meeting.

#### Introduction

Given the volume of information included, the manual is divided into four sections:

- Section 1 describes HPAC's HMIS governance structure and the various roles and responsibilities of each entity
- Section 2 reviews several general operating policies and procedures such as how to add a user and how to request technical assistance
- Section 3 features HPAC's Data Quality Plan including local goals and benchmarks for timeliness, completeness, bed/unit utilization, bed coverage rates, and service-volume coverage rates
- Section 4 outlines HPAC's Security and Privacy Plan and the provisions in place to protect the privacy and security of the information collected and stored in HMIS

#### What is HMIS

HMIS is a local information technology system used to collect data on the provision of housing and services to persons and families experiencing homelessness as well as persons and families at risk of experiencing homelessness.

#### **Who Uses HMIS**

The U.S. Department of Housing and Urban Development (HUD) requires the use of HMIS for projects funded by the Continuum of Care (CoC) program, Emergency Solutions Grants (ESG) program, and Housing Opportunities for Persons with AIDS (HOPWA) program.

In 2010, the U.S. Interagency Council on Homelessness (USICH) affirmed HMIS as the official method of measuring outcomes in its Opening Doors: Federal Strategic Plan to Prevent and End Homelessness. Since then many federal agencies that provide homeless services funding have joined together and are working with HUD to coordinate the effort.

As of 2016, the U.S. Department of Veterans Affairs (VA) requires the use of HMIS for projects funded by the Supportive Service for Veteran Families (SSVF) program. The U.S. Department of Health and Human Services (HHS) requires the use of HMIS for projects funded by the Runaway and Homeless Youth (RHY) program and Projects for Assistance in Transition from Homelessness (PATH) program. In addition, many state and local government programs also require HMIS usage.

<sup>&</sup>lt;sup>1</sup> 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578 165

An important exception to the aforementioned entities is victim service providers. Pursuant to 24 CFR Part 578.57<sup>2</sup>, providers assisting victims of domestic violence, dating violence, human trafficking, sexual assault, and stalking victims are prohibited from using HMIS. Rather such providers must use a comparable database.

### Why HMIS is Important

HMIS is a valuable resource because of its capacity to integrate and de-duplicate data across projects in a designated service area. Communities can use aggregate HMIS data to understand the size, characteristics, and needs of the homeless population at multiple levels: project, system, local, state, and national. The Annual Homeless Assessment Report (AHAR) is HUD's annual report that provides Congress with detailed data on individuals and families experiencing homelessness across the country each year. HUD could not write this report if communities were not able to provide reliable, aggregate data on the clients they serve.

\_

<sup>&</sup>lt;sup>2</sup> 24 CFR Part 578.57 Homeless Management Information System: http://www.ecfr.gov/cgi24bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578\_165

#### **Section 1: HMIS Governance Structure**

HPAC's HMIS governance structure features a tripartite composition of the following roles:

- System Administrator
- Lead Agency
- Daily Operator

Pursuant to HPAC's Governance Charter, Sacramento Steps Forward (SSF) serves as the region's HMIS System Administrator; Yolo Community Care Continuum (YCCC) serves as the region's HMIS Lead Agency; and the County of Yolo serves at the region's HMIS Daily Operator.

### **HMIS System Administrator**

As the HMIS System Administrator, SSF:

#### Software

- Selects the HMIS software provider
- Serves as primary liaison between the HMIS software provider and the Partner Agencies
- Contracts with the HMIS software provider to administer and maintain central backup server operations including security procedures and daily system backup to prevent the loss of data

#### **Technical**

- Issues new user accounts and passwords
- Prompts users to periodically change their passwords for security purposes
- Inactivates user accounts after a specified period of inactivity
- Notifies agencies of HMIS failures and/or system errors immediately upon discovery
- Facilitates the initial software training for all new HMIS users
- Provides training materials, including user manuals with definitions and instructions to each individual who attends the initial training

#### **Privacy and Security**

- Maintains all client-identifying information in the strictest of confidence, using the latest available technology
- Monitors access to HMIS in order to detect violations of information security protocols
- Maintains accurate logs of all changes made to the information contained within the database for inspection purposes
- Investigates suspected breaches of confidentiality and suspends HMIS access accordingly
- Develops privacy and security protocols as it pertains to system safety and data integrity

#### **HMIS Lead Agency**

As the HMIS Lead Agency, YCCC:

#### General

- Serves as the primary liaison for any HUD-related requirements including submitting the CoC Consolidated Application and the CoC Planning Grant
- Manages and administers all HMIS-related invoicing and payment processing

### **HMIS Daily Operator**

As the HMIS Daily Operator, the County of Yolo:

#### General

- Informs HPAC of key HUD and SSF policies related to HMIS
- Facilitates quarterly HPAC Data Subcommittee meetings to discuss system wide challenges
- Attends SSF HMIS meetings including their HMIS End-Users Meetings and their HMIS and Data Committee Meetings
- Shares relevant/important information from SSF HMIS meetings as needed
- Coordinates the collection of data for HUD reports
- Submits reports to HUD as required
- Assists Partner Agencies with HUD or other funding reports and grant applications as needed
- Promotes HMIS usage among all homeless service providers regardless of funding source
- Provides all other reasonably expected activities regarding the day-to-day implementation and operation of HMIS

#### **Technical**

- Serves as the primary liaison between the Partner Agencies and SSF
- Ensures that HPAC is compliant with the latest HMIS data standards as prescribed by HUD and SSF
- Programs new projects according to HUD's latest HMIS Data Standards
- Initiates and maintains interagency data sharing options in HMIS
- Provides refresher trainings as needed, including one-on-one trainings
- Resets usernames and passwords as needed
- Merges duplicate records as needed
- Visits agency sites to learn about/resolve issues as needed
- Provides help desk service by responding within 48 hours of an inquiry
- Works with SSF to develop, implement, and maintain written HMIS policies and procedures including a security and privacy plan as well as a data quality plan in accordance with HUD's final rulings
- Identifies potential data quality issues and recommends actions for improvement

#### **HPAC Data Subcommittee**

Another component of HPAC's HMIS governance structure is the Data Subcommittee. Serving as an advisory group to the full HPAC body, the Data Subcommittee makes critical recommendations about issues related to HMIS.

The Data Subcommittee's tasks include working with the HMIS System Administrator, HMIS Lead Agency, and HMIS Daily Operator to:

- Annually review this manual and any other HMIS policies and procedures required by HUD and provide recommendations to the full HPAC body for final approval
- Develop and implement a plan for monitoring HMIS to ensure that:
  - HMIS is satisfying the requirements of all regulations and notices issued by HUD
  - The HMIS System Administrator, HMIS Lead Agency, and HMIS Daily Operator are fulfilling the obligations outlined in the HPAC Governance Charter, in the HPAC Policies and Procedures Manual, and in this HPAC HMIS Policies and Procedures Manual
  - Agencies adhere to HPAC's data quality as well as privacy and security standards, which includes reviewing project reports and/or audits and developing technical assistance plans
- Review and approve the final submission of the following counts and reports:
  - Sheltered and Unsheltered Point-In-Time Counts (PIT)
  - Housing Inventory Count (HIC)
  - Annual Homeless Assessment Report (AHAR)
  - o Annual HUD System Performance Measures Report

Comprised of at least one representative from each HMIS Partner Agency, the Data Subcommittee meets on a quarterly basis, on the third Wednesday of January, April, July and October from 8:30 to 9:30 a.m. among rotating locations in Davis, West Sacramento, and Woodland. The County of Yolo's Homeless Analyst staffs the Data Subcommittee by scheduling the meetings, creating the agendas, facilitating the discussions, recording the minutes, and sharing recommendations with the full HPAC body.

### **Section 2: General Operating Policies and Procedures**

The following subsections describe several of HPAC's general HMIS operating policies and procedures.

### How to Add an Agency

To add an agency to HPAC's HMIS, the agency under consideration must complete the following steps and/or agree to the following stipulations:

- 1. Contact the HMIS Daily Operator
- 2. Read the following HPAC documents:
  - HPAC Governance Charter
  - HPAC Policies and Procedures Manual
  - HPAC HMIS Policies and Procedures Manual
- 3. Complete and submit the following forms to the HMIS Daily Operator:
  - SSF New Project Agency Add Form
  - HPAC HMIS Agency Partner Agreement
  - HPAC Interagency HMIS Data Sharing Agreement
- 4. Adopt either HPAC's standard Privacy Statement (provided by the Homeless Analyst) or your own agency-specific Privacy Statement that satisfies all of the criteria listed in the 2004 HMIS Data and Technical Standards (see Section 4: HMIS Privacy and Security—Privacy Statement)
- 5. Post the Privacy Statement, along with the Consumer Notice and List of Participating Agencies (provided by the Homeless Analyst) at your intake desk(s) or comparable location(s)
- 6. If your agency maintains an agency website, post a link to the Privacy Statement on the homepage of the agency's website
- 7. Agree to ensure that hard copies of the Privacy Statement, Consumer Notice, and List of Participating Agencies are available upon a client's request
- 8. Agree to the cost/invoicing process as explained below:
  - As the HMIS Lead Agency, YCCC oversees the cost/invoicing process. As such, YCCC invoices on a
    quarterly basis during the months of January, April, July, and October. All payments are due to
    YCCC upon receipt of the invoice. An HMIS Lead Agency cannot fund HMIS utilization on behalf
    of any other agency.
  - The cost breakdown for each agency is based on:
    - A one-time user activation fee of \$175 per user
    - o A CoC fee of \$5,400 divided equally among the number of Partner Agencies
    - o A user fee of \$30 per user per month

#### How to Add a New Project

To add a new project to an already existing agency:

- 1. Contact the HMIS Daily Operator
- 2. Read, complete, and submit the following form to the HMIS Daily Operator:
  - SSF New Project Add Form
    - Please note the form does not need to be complete upon submittal. Typically, programming a new project is an iterative process that requires several revisions to ensure accurate tracking of outcomes

#### How to Add a User

To add a user to an already existing agency:

- 1. Contact the HMIS Daily Operator
- 2. Read, complete, and submit the following forms to the HMIS Daily Operator for each new user:
  - SSF HMIS User Account Request Form
  - SSF HMIS User's Agreement
    - Please note this form requires a Human Resources representative or Executive Director to sign the agreement, attesting that the agency conducted a criminal background check on the new user(s)
    - The HMIS System Administrator will deny HMIS access to any potential new users who
      pleaded no contest or were convicted of any fraud (including identity theft) or stalking
      related felony crimes punishable by imprisonment of one year or more in any state (see
      Section 4: HMIS Privacy and Security—Background Check)
    - The HMIS Daily Operator will forward the completed paperwork to SSF by emailing hmis@sacstepsfoward.org and copying the new user(s)
- 3. Signup for a New End-User Training by visiting <a href="https://sac.clarityhs.com/login">https://sac.clarityhs.com/login</a> and completing the online RSVP form
  - As the HMIS System Administrator, SSF facilitates all new user trainings and requires participation in the training prior to receiving access to the local HMIS
  - At the training, the new user(s) will receive his or her username(s) and password(s)
  - SSF typically schedules the trainings on the third Friday of every month

### **How to Discontinue an Agency**

To discontinue an agency:

- 1. Send a message to the HMIS Daily Operator containing the following information:
  - Reason for discontinuation
  - Official date agency wishes to discontinue use
    - Prior to contacting the HMIS Daily Operator, please ensure that your agency exited all active clients for each project(s). To do so, run a "Program Roster" report and select the "Active" status for each project(s)
- 2. The HMIS Daily Operator will then share the message with the HMIS Lead Agency
  - Together, the agency, the HMIS Lead Agency, and the HMIS Daily Operator will determine the appropriate final payment amount and agree upon a final date for discontinued use
  - As the cost/invoicing process is on a quarterly schedule, agencies may have to wait until the end
    of a quarter to discontinue use

#### **How to Discontinue a Project**

To discontinue a project:

- 1. Send a message to the HMIS Daily Operator containing the following information:
  - Name of project to be discontinued
  - Reason for discontinuation
  - Official date project ended
    - Prior to contacting the HMIS Daily Operator, please ensure that your agency exited all active clients for each project. To do so, run a "Program Roster" report and select the "Active" status

#### How to Discontinue a User

To discontinue a user:

- 1. Send a message to the HMIS Daily Operator containing the following information:
  - Name of user to be discontinued
  - Reason for discontinuation
  - If applicable, date of separation to ensure activation is not terminated preemptively

#### **How to Request Technical Assistance**

To request technical assistance:

- 1. Send a message to the HMIS Daily Operator containing the following information:
  - Detailed summary of the issue
  - If applicable, client unique ID number(s)
  - Call back number
  - Please indicate if the issue is urgent e.g. need to submit a report by a particular deadline
    - The HMIS Daily Operator will respond to your request within 48 hours of receipt unless it is a county-recognized holiday and/or the agency receives an out of office reply

#### How to Request a Merging of Two Records

To request a merging of two records:

- 1. Send a message to the HMIS Daily Operator containing the following information:
  - Name
  - Client unique ID numbers of the records to be merged
    - o Please indicate which record the user thinks should be the surviving record
  - Please indicate if the issue is urgent e.g. need to submit a report by a particular deadline
    - o The HMIS Daily Operator will respond to your request within 48 hours of receipt unless it is a county-recognized holiday and/or the agency receives an out of office reply

### **How to Request a Password Reset**

To request a password reset:

- 2. Send a message to the HMIS Daily Operator containing the following information:
  - Name
  - Please indicate if the issue is urgent e.g. need to submit a report by a particular deadline
    - The HMIS Daily Operator will respond to your request within 48 hours of receipt unless it is a county-recognized holiday and/or the agency receives an out of office reply
    - The HMIS Daily Operator will respond with a username and a temporary password.
       Upon logging in, the system will prompt the user to enter a new password

#### **How to Submit a Data Request**

To submit a data request:

- 1. Send a message to the HMIS Daily Operator containing the following information:
  - Detailed summary of data request including:
    - Purpose of the data request
    - Authority who approved this request
    - Requested report period
    - o Preferred format for the data file
    - Indicate if this is a system wide report, if not, what project types should be included e.g. only HUD-funded projects

- o Indicate what data elements need to be included
- o Indicate if you would like unduplicated data or all records collected
- o Due date
- Call back number
- Please indicate if the issue is urgent e.g. need to submit a report by a particular deadline
  - The HMIS Daily Operator will respond to your request within 48 hours of receipt unless it is a county-recognized holiday and/or the agency receives an out of office reply

### **Section 3: HMIS Data Quality Plan**

This section describes HPAC's HMIS Data Quality Plan. Developed by the HPAC Data Subcommittee in coordination with the HMIS System Administrator, HMIS Lead Agency, and HMIS Daily Operator, the Plan represents a system-level document that enhances HPAC's ability to achieve statistically valid and reliable data. As such, the Plan:

- Establishes specific data quality benchmarks for timeliness, completeness, bed/unit utilization, bed coverage rates, and service-volume coverage rates
- Describes the procedures for implementing the plan and monitoring progress toward meeting the benchmarks

As stated at the beginning of this manual, HPAC will review, revise, and re-ratify its HMIS Data Quality Plan every October upon a majority vote of all voting members present during the scheduled meeting. Prior to HPAC's vote, the Data Subcommittee will recommend updates to the full HPAC body according to HUD's latest HMIS Data Standards and locally developed performance plans.

#### **HMIS Data Standards**

Published in 2014, HUD's HMIS Data Standards serve as the basis for HPAC's Data Quality Plan. Since HUD is responsible for setting forth guidelines regarding HMIS usage, the Standards outline the minimum participation and reporting requirements.

The Standards include three primary components: (1) Universal Data Elements, (2) Program-Specific Data Elements, and (3) Project Descriptor Data Elements.

#### **Universal Data Elements**

The Universal Data Elements establish the baseline collection requirements for all agencies entering data into HMIS. In this way, the Universal Data Elements provide the foundation for producing unduplicated estimates of the number of homeless persons receiving services, basic demographic information, and patterns of use such as the length of project stays, exits to permanent housing, chronicity, and the number of homeless episodes over time.

The required Universal Data Elements include:

- 3.1 Name
- 3.2 Social Security Number
- 3.3 Date of Birth
- 3.4 Race
- 3.5 Ethnicity
- 3.6 Gender
- 3.7 Veteran Status
- 3.8 Disabling Condition
- 3.9 Residence Prior to Project Entry
- 3.10 Project Entry Date
- 3.11 Project Exit Date
- 3.12 Destination
- 3.13 Personal ID
- 3.14 Household ID
- 3.15 Relationship to Head of Household
- 3.16 Client Location

3.17 Length of Time on Street, in an Emergency Shelter or Safe Haven

## **Program-Specific Data Elements**

Program-Specific Data Elements differ from Universal Data Elements in that no one project must collect every single element in this subsection. Which data elements are required is dictated by the reporting requirements set forth by the project funder.

Many of these data elements represent transactions or information that may change over time. Most agencies capture Program-Specific Data Elements at project entry and exit, but a few must be captured at project entry, exit, and on an annual basis.

The required Program-Specific Data Elements include:

- 4.1 Housing Status
- 4.2 Income and Sources
- 4.3 Non-Cash Benefits
- 4.4 Health Insurance
- 4.5 Physical Disability
- 4.6 Developmental Disability
- 4.7 Chronic Health Condition
- 4.8 HIV/AIDS
- 4.9 Mental Health Condition
- 4.10 Substance Abuse
- 4.11 Domestic Violence
- 4.12 Contact
- 4.13 Date of Engagement
- 4.14 Services Provided
- 4.15 Financial Assistance Provided
- 4.16 Referrals Provided
- 4.17 Residential Move-In Date
- 4.18 Housing Assessment Disposition
- 4.19 Housing Assessment at Exit

## **Project Descriptor Data Elements**

Project Descriptor Data Elements contain basic information about projects participating in a region's HMIS and help ensure HMIS is the central repository of information about homelessness. The Project Descriptor Data Elements very much represent the building blocks of HMIS. They enable the system to:

- Associate client-level records with the various projects that a client will enroll in across a service area
- Clearly define the type of project the client is associated with the entire time he or she received housing and/or services
- Identify which federal partner programs are providing funding to the project
- Track bed and unit inventory and other information, by project, which is relevant for:
  - Sheltered and Unsheltered Point-In-Time Counts (PIT)
  - Housing Inventory Count (HIC)
  - Annual Homeless Assessment Report (AHAR)
  - Data Quality Monitoring Reports
  - System Performance Measures Report

The HMIS Daily Operator and/or HMIS System Administrator, not the agency or user, generally enters and manages Project Descriptor Data Elements. As such, the HMIS Daily Operator and/or HMIS System Administrator enter this information upon project setup, but will conduct an annual verification of the information and update the information as needed (see Other Important Data Quality Practices—Annual Verifications).

The required Project Descriptor Data Elements include:

- 2.1 Organization Identifiers
- 2.2 Project Identifiers
- 2.3 Continuum of Care Code
- 2.4 Project Type
- 2.5 Method for Tracking Emergency Shelter
- 2.6 Federal Partner Funding Sources
- 2.7 Bed and Unit Inventory Information
- 2.8 Site Information Optional
- 2.9 Target Population

#### **Goals and Benchmarks**

#### **Timeliness**

Timeliness refers to how much time elapses from when a user collects data from a client to when a user inputs the data into HMIS. Thus, the system compares the difference between the project entry/exit date specified for the client and the date the user enters the information into HMIS. For example, if a user inputted a project entry date of April 4 (the date of the client's intake assessment), but the current date is April 9, then there would be a five (5) day lag time in entering the data.

There are numerous reasons why timely data entry is important. First, it minimizes the likelihood of human error that can occur when too much time has passed between the data collection and the data entry. Timely data entry also ensures that the data is readily accessible, whether for monitoring purposes or for meeting funding requirements. Lastly, timeliness is a critical component of coordinated entry as it relies on up-to-date bed/unit availability in order to make referrals.

While HPAC highly encourages live data entry, HPAC acknowledges that there are circumstances when live data entry may not be possible. As such, HPAC set the following goal and corresponding benchmarks for each project type:

Goal	At least 95% of all data entry should fall within the specified timeliness benchmarks
------	---

Project Type	Benchmark
Emergency Shelter	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit
Transitional Housing	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit
Permanent Housing	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit

Permanent Supportive Housing	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit
Prevention and Rapid Re-Housing	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit
Street Outreach	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit
Supportive Services Only	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit

It is important to note that users cannot back enter or edit data to fix timeliness. Rather users can only strive to improve data timeliness for future entries.

## **Completeness**

Completeness refers to the number of "Missing/Data Not Collected" and "Client Doesn't Know/Client Refused" responses collected for both the required Universal Data Elements and Project-Specific Data Elements.

Complete data is key to assisting clients end their homelessness. Not only does incomplete data hinder an agency's ability to provide comprehensive care, but incomplete data also negatively affects HPAC's ability to identify service deficiencies and devise effective strategies for improvement. In addition, HMIS data quality is a component of most federal funding applications and low HMIS data quality scores may affect renewal funding as well as future funding requests. Given its importance, HPAC set the following goal and corresponding benchmarks for each project type and data element.

Goal	At least 95% of all data entry should fall within the specified completeness benchmarks
------	---

	Benchmark						
Universal Data Element	Emergency Shelter and Non-HUD Supportive Services Only		HUD Supportive Services Only, Transitional Housing, Permanent Housing, Permanent Supportive Housing, Prevention, and Rapid Re-Housing		Street Outreach		
	Missing/Data Not Collected	Client Doesn't Know/Client Refused	Missing/Data Not Collected	Client Doesn't Know/Client Refused	Missing/Data Not Collected	Client Doesn't Know/Client Refused	
3.1 Name	0%	0%	0%	0%	0%	0%	
3.2 Social Security Number	0%	0%	0%	5%	0%	5%	
3.3 Date of Birth	0%	0%	0%	5%	0%	5%	

3.5 Ethnicity       0%       0%       0%       5         3.6 Gender       0%       0%       0%       0         3.7 Veteran Status       0%       0%       0%       5         3.8 Disabling Condition       0%       0%       0%       5         3.9 Residence Prior to Project Entry       0%       0%       0%       0         3.10 Project Entry Date       0%       0%       0       0         3.11 Project Exit Date       0%       0%       0       0         3.12 Destination       5%       5%       5%       5	%     0%       %     0%       %     0%       %     0%       %     0%       %     0%       %     0%       %     0%       %     0%	0% 5% 5% 0%					
3.6 Gender       0%       0%       0%       0         3.7 Veteran Status       0%       0%       0%       5         3.8 Disabling Condition       0%       0%       0%       5         3.9 Residence Prior to Project Entry       0%       0%       0%       0         3.10 Project Entry       0%       0%       0%       0         3.11 Project Exit Date       0%       0%       0       0         3.12 Destination       5%       5%       5%       5	% 0% % 0% % 0% % 0%	0% 5% 5% 0%					
3.7 Veteran Status       0%       0%       0%       5         3.8 Disabling Condition       0%       0%       0%       5         3.9 Residence Prior to Project Entry       0%       0%       0%       0         3.10 Project Entry Date       0%       0%       0       0         3.11 Project Exit Date       0%       0%       0       0         3.12 Destination       5%       5%       5%       5	% 0% % 0% % 0% % 0%	5% 5% 0%					
3.8 Disabling Condition       0%       0%       0%       5         3.9 Residence Prior to Project Entry       0%       0%       0%       0         3.10 Project Entry Date       0%       0%       0       0         3.11 Project Exit Date       0%       0%       0       0         3.12 Destination       5%       5%       5       5	% 0% % 0% % 0%	5% 0% 0%					
3.9 Residence Prior to Project Entry       0%       0%       0%       0         3.10 Project Entry Date       0%       0%       0%       0         3.11 Project Exit Date       0%       0%       0       0         3.12 Destination       5%       5%       5       5	% 0% % 0%	0%					
Project Entry         0%         0%         0           3.10 Project Entry Date         0%         0%         0           3.11 Project Exit Date         0%         0%         0           3.12 Destination         5%         5%         5           3.15 Relationship to         5%         5%         5	% 0% % 0%	0%					
3.11 Project Exit Date 0% 0% 0% 0  3.12 Destination 5% 5% 5% 5  3.15 Relationship to	% 0%						
3.12 Destination 5% 5% 5% 5  3.15 Relationship to		0%					
3 15 Relationship to	0/ 450/						
3.15 Relationship to	% 15%	5 5%					
Head of Household 0% 0% 0% 0	% 0%	0%					
3.16 Client Location 0% 0% 0% 0	% 0%	0%					
3.17 Length of Time on Street or in an 0% 0% 0% 0 0 Emergency Shelter	% 0%	0%					
Benchmark	Benchmark						
Program-Specific Data Element  Emergency Shelter and Non-HUD Supportive Services Only Supportive Services Only Housing, Permanent Supportive Services Only Re-Housing	manent portive St	reet Outreach					
Not Collected Know/Client Not Collected Know,	Doesn't Missing/l /Client Not used Collect	Vnow/Client					
	% 0%	0%					
4.1 Housing Status 0% 0% 0% 0	70 070						
	% 0%	0%					
4.2 Income and Sources 0% 0% 0% 0							
4.2 Income and Sources       0%       0%       0         4.3 Non-Cash Benefits       0%       0%       0%       0	% 0%	0%					
4.2 Income and Sources       0%       0%       0         4.3 Non-Cash Benefits       0%       0%       0%       0         4.4 Health Insurance       0%       0%       0       0	% 0%	0%					

Disability						
4.7 Chronic Health Condition	0%	0%	0%	0%	0%	0%
4.8 HIV/AIDS	0%	0%	0%	0%	0%	0%
4.9 Mental Health Problem	0%	0%	0%	0%	0%	0%
4.10 Substance Use	0%	0%	0%	0%	0%	0%
4.11 Domestic Violence	0%	0%	0%	0%	0%	0%
4.12 Contact	N/A	N/A	N/A	N/A	0%	0%
4.26 Employed	0%	0%	5%	5%	5%	5%

Unlike timeliness, users can fix completeness by back entering or editing data. Thus, HPAC highly encourages users to routinely monitor completeness and update any records that exceed the benchmarks listed above. In some circumstances, this may require staff to re-review paper intake forms or even re-contact the client.

## **Bed/Unit Utilization Rates**

Bed/unit utilization rates compare the number of occupied beds/units to the project's entire bed/unit inventory. Thus, the rates are equal to the number of occupied beds/units divided by the number of total beds/units available.

A core feature of HMIS is its ability to record the number of nights a client stays at a residential housing project. When an agency admits a client into a residential project, HMIS assigns the client a housing service. Named "Housed with—name of the project or funding source," the housing service remains active until the agency exits the client from the project.

Thus, a project's bed/unit utilization rate is an excellent barometer of data quality. A low utilization rate could reflect low occupancy, but it could also indicate that an agency is not entering data into HMIS for every client served. A high utilization rate could reflect that the project is over capacity, but it could also indicate that an agency has not properly exited clients from the project in HMIS. More specifically, bed utilization can legitimately exceed 105% for two main reasons. First, the project offers overflow beds—e.g. cots or mattresses—sporadically throughout the year to accommodate high-demand nights, which results in a larger count of persons than the average number of year-round beds reported on the Housing Inventory Count. Second, the project serves a family with more children than the beds reported as part of the year's Housing Inventory Count. A third reason, related to a data quality issue, is that the project operator is not entering accurate project entry or exit dates, which causes an overlap in stays.

Using HUD's Annual Homeless Assessment Report (AHAR) guidelines, HPAC set the following goal and benchmarks for all residential housing projects.

Goal	100% of all data entry should fall within the specified utilization benchmarks
------	--

Project Type	Benchmark
Emergency Shelter	65 to 105%
Transitional Housing	65 to 105%
Permanent Supportive Housing	65 to 105%

Similar to completeness, users can fix bed/unit utilization rates by back entering or editing data. HPAC highly encourages users to routinely monitor bed/unit utilization rates to ensure true occupancy rates are accurately reflected within HMIS. In addition, HPAC recognizes that new projects may require time to reach their projected occupancy numbers and will not expect them to meet the utilization benchmark during the first six months of operation.

#### **Bed Coverage Rates**

Bed coverage rates compare the total number of beds in HMIS divided by the total bed inventory. The bed coverage rate should account for all HPAC beds in the community, including both HUD and non-HUD funded beds.

This is an important rate to calculate to ensure that HPAC meets HUD's minimum threshold of at least 50% to be eligible for the Annual Homeless Assessment Report (AHAR). Without meeting the 50% threshold, HUD is unable to project estimates for non-HMIS projects with reasonable statistical confidence.

Despite the 50% threshold, HPAC will strive to achieve an even higher standard of 85% as prescribed in HUD's CoC application. The HMIS Daily Operator will calculate these rates annually for the CoC application as well as in preparation for the AHAR.

Goal	At least 85% bed coverage rate for all project types

#### **Service-Volume Coverage Rates**

Service-volume coverage rates compare the number of persons served annually by any given project that participates in HMIS divided by the number of persons served annually by all HPAC projects in the community.

This is an important rate to calculate to ensure that HPAC meets HUD's minimum threshold of at least 50% to be eligible for the Annual Homeless Assessment Report (AHAR). Without meeting the 50% threshold, HUD is unable to project estimates for non-HMIS projects with reasonable statistical confidence.

Despite the 50% threshold, HPAC will strive to achieve an even higher standard of 85% as prescribed in HUD's CoC application. The HMIS Daily Operator will calculate these rates annually for the CoC application as well as in preparation for the AHAR.

Goal At least 85% service-volume coverage rate for all project types	Goal	At least 85% service-volume coverage rate for all project types
--	------	---

#### **Other Important Data Quality Practices**

HPAC will implement two other important practices as part of its HMIS Data Quality Plan. The practices involve an annual verification of Project Descriptor Data Elements and residential housing projects as well as establishing local standards regarding accuracy.

## **Annual Verifications**

Every year prior to the Annual Homeless Assessment Report (AHAR), the HMIS Daily Operator will request agencies to verify their Project Descriptor Data Elements (see Section 3: HMIS Data Quality Plan—Project Descriptor Data Elements) as well as their inventory of residential housing projects.

This practice will ensure that bed/unit utilization rates are accurate and therefore AHAR reporting is accurate. Collecting such information will also be helpful for the numerous annual reports required by HUD including the Point-In-Time Count (PIT), the Housing Inventory Count (HIC), and the System Performance Measure Report.

## **Accuracy**

HMIS data needs to accurately represent the clients served and the services provided. The best way to measure accuracy is to compare the HMIS data with primary sources such as a social security card, birth certificate, or driver's license. To ensure the most up-to-date and complete data, HPAC recommends internal data quality monitoring on a monthly basis.

Another important aspect of maintaining data integrity is collecting and entering data in a common and consistent manner across all projects. To that end, the HPAC Data Subcommittee will regularly review best practices and discuss common problems.

Some important things to note regarding accuracy include:

- All Universal Data Elements and Program Specific Data Elements must be obtained from each adult and unaccompanied youth who apply for services
- Most Universal Data Elements are also required for children age 17 years and under
- Most Universal Data Elements and Program-Specific Data Elements include a "Client Doesn't Know" or "Client Refused" response category. HUD considers these valid responses if the client does not know or the client refuses to respond to the question. It is not the intention of HUD, or any other funders who require HMIS usage, to have agencies deny clients assistance if they refuse or are unable to supply the information. However, some information may be required by projects or public or private funders to determine eligibility for housing or services, or to assess needed services.
- Agencies should not use the "Client Doesn't Know" or "Client Refused" responses to indicate that the case manager or data entry staff member does not know the client's response
- Since HPAC's HMIS requires a response to all data fields before saving a record, the agency should use the "Data not collected" response to indicate missing data

#### **Monitoring**

The purpose of monitoring is to ensure that agencies are meeting or are as close as possible to meeting the agreed-upon data quality goals and benchmarks. Monitoring will also help agencies quickly identify and ideally resolve data quality issues.

The following subsections review the roles and responsibilities of each entity in the monitoring process and establish a monitoring schedule.

## **Monitoring Roles and Responsibilities**

#### **HMIS System Administrator**

The HMIS System Administrator is responsible for the ongoing maintenance of the existing data quality report, which includes working with the HMIS software vendor to update the report to reflect HUD's latest HMIS Data Standards. The HMIS System Administrator is also responsible for providing initial training to new users, teaching best practices for HMIS data entry.

#### **HMIS Daily Operator**

The HMIS Daily Operator is responsible for providing technical assistance to Partner Agencies that need help addressing data quality issues. The HMIS Daily Operator is also responsible for providing ongoing training beyond the initial training provided by the HMIS System Administrator.

#### **HPAC Data Subcommittee**

The HPAC Data Subcommittee is responsible for reviewing each project's data quality on a quarterly basis. The Data Subcommittee will work to identify issues that do not comply with the agreed-upon goals and benchmarks. Based from the Data Subcommittee's assessment, the HMIS Daily Operator will offer individualized support and develop specialized trainings as necessary.

#### **HMIS Partner Agency**

The HMIS Partner Agency is responsible for pulling data quality reports and correcting data entry errors for each project within HMIS.

### **Monitoring Schedule**

As stated above, the HPAC Data Subcommittee will monitor the data quality of all active projects within HMIS on a quarterly basis. The Data Subcommittee meets on a quarterly basis, on the third Wednesday of January, April, July and October from 8:30 to 9:30 a.m. among rotating locations among Davis, West Sacramento, and Woodland. The County of Yolo's Homeless Analyst, who staffs the Data Subcommittee, will prepare data quality reports prior to the quarterly meetings.

# **Section 4: HMIS Privacy and Security Plan**

This section describes HPAC's HMIS Privacy and Security Plan. Developed by the HPAC Data Subcommittee in coordination with the HMIS System Administrator, HMIS Lead Agency, and HMIS Daily Operator, the Plan represents a system-level document that enhances HPAC's ability to protect the privacy and security of the information collected and stored in HMIS. As such, the Plan:

- Addresses federal regulations related to HMIS privacy and security
- Delineates specific roles and responsibilities for the HMIS System Administrator, the HMIS Daily
   Operator, the HMIS Partner Agency, and the HMIS End User
- Establishes system security safeguards
- Describes the procedures for implementing the plan and monitoring for compliance

As stated at the beginning of this manual, HPAC will review, revise, and re-ratify the HMIS Privacy and Security Plan every October upon a majority vote of all voting members present during the scheduled meeting. Prior to HPAC's vote, the Data Subcommittee will recommend updates to the full HPAC body according to HUD's latest HMIS standards.

It is important to note that the Plan complies with HUD's 2004 HMIS Data and Technical Standards Final Notice<sup>3</sup> as well as state and local laws regulating the confidentiality of personal information. Yet, at the time of writing this Plan, HUD has not yet released a final notice regarding HMIS security. Given this, the Plan contains preliminary security safeguards; however, HPAC anticipates updating the safeguards upon receiving final guidance from HUD.

It is also important to note that HPAC wrote the Plan in support of an open HMIS system, where data sharing occurs amongst agencies who opted to be part of the HPAC Data Sharing Agreement. While HPAC recognizes that individual agencies serve clients, HPAC equally recognizes that the region's entire homeless services system serves clients.

#### **HMIS Data and Technical Standards**

The core tenets of HPAC's Privacy and Security Plan are the requirements specified in the 2004 HMIS Data and Technical Standards Final Notice<sup>4</sup>. The following subsections explain each requirement and HPAC's standards for compliance.

#### **Privacy Statement**

The Privacy Statement describes how an agency collects, uses, and discloses client information. The Privacy Statement must also describe how a client can access his or her information. HPAC requires that each agency either adopt HPAC's standard Privacy Statement or adopt their own agency-specific Privacy Statement, which meets all of the minimum requirements set forth in HUD's 2004 HMIS Data and Technical Standards Final Notice<sup>5</sup> (see Additional Information about the Privacy Statement).

https://www.hudexchange.info/resources/documents/2004HUDDataandTechnicalStandards.pdf

https://www.hudexchange.info/resources/documents/2004HUDDataandTechnicalStandards.pdf

https://www.hudexchange.info/resources/documents/2004HUDDataandTechnicalStandards.pdf

<sup>&</sup>lt;sup>3</sup> 2004 HMIS Data and Technical Standards Final Notice:

<sup>&</sup>lt;sup>4</sup> 2004 HMIS Data and Technical Standards Final Notice:

<sup>&</sup>lt;sup>5</sup> 2004 HMIS Data and Technical Standards Final Notice:

In addition to having a Privacy Statement, HPAC requires that HMIS Partner Agencies, who have a website, post a link to the Privacy Statement online. HPAC also requires that Partner Agencies post the Privacy Statement at each intake desk(s) or a comparable location(s). Lastly, HPAC requires that all staff have access to hard copies of the Privacy Statement when out in the field.

## **Additional Information about the Privacy Statement**

As stated above, every HMIS Partner Agency must have a Privacy Statement that describes how and when the agency will use and disclose a client's Protected Personal Information (PPI). PPI includes name, Social Security Number (SSN), date of birth, zip code, project entry and/or exit date.

Partner Agencies may be required to collect a client's PPI by law or by funders. Partner Agencies also collect PPI to monitor project operations, to better understand the needs of persons experiencing homelessness, and to improve services for persons experiencing homelessness. HPAC only permits agencies to collect PPI with a client's written consent.

Partner Agencies may use and disclose PPI to:

- Verify eligibility for services
- Provide clients with and/or refer clients to services that meet their needs
- Manage and evaluate the performance of programs
- Report about program operations and outcomes to funders and/or apply for additional funding to support agency programs
- Collaborate with other local agencies to improve service coordination, reduce gaps in services, and develop community-wide strategic plans to address basic human needs
- Participate in research projects to better understand the needs of people served

Partner Agencies may also be required to disclose PPI for the following reasons:

- When the law requires it
- When necessary to prevent or respond to a serious and imminent threat to health or safety
- When a judge, law enforcement or administrative agency orders it

Partner Agencies are obligated to limit disclosures of PPI to the minimum necessary to accomplish the purpose of the disclosure. Uses and disclosures of PPI not described above may only be made with a client's written consent. Clients have the right to revoke consent at any time by submitting a request in writing.

Clients also have the right to request in writing:

- A copy of all PPI collected
- An amendment to any PPI used to make decisions about the client's care and services (this request may be denied at the discretion of the agency, but the client's request should be noted in the project records)
- An account of all disclosures of client PPI
- Restrictions on the type of information disclosed to outside partners
- A current copy of the agency's Privacy Statement

Partner Agencies may reserve the right to refuse a client's request for inspection or copying of PPI in the following circumstances:

- Information compiled in reasonable anticipation of litigation or comparable proceedings
- The record includes information about another individual (other than a health care or homeless provider)

- The information was obtained under a promise of confidentiality (other than a promise from a health care or homeless provider) and a disclosure would reveal the source of the information
- The Partner Agency believes that disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual

If an agency denies a client's request, the client should receive a written explanation for the denial. The client has the right to appeal the denial by following the established HPAC Partner Agency Agreement grievance procedure. Regardless of the outcome of the appeal, the client will have the right to add to his or her project records a concise statement of disagreement. The agency must disclose the statement of disagreement whenever it discloses the disputed PPI.

All individuals with access to PPI are required to complete formal training in privacy requirements at least annually.

Partner Agencies can amend their Privacy Statements at any time. Amendments may affect information obtained by the agency before the date of the change. An amendment to the Privacy Statement regarding use or disclosure will be effective with respect to information processed before the amendment, unless otherwise stated. The agency must make available a record of all amendments to the Privacy Statement upon a client's request.

As stated previously, a Privacy Statement must reflect, at a minimum, the baseline requirements outlined within HUD's 2004 HMIS Data and Technical Standards Final Notice. In any instance where an agency's Privacy Statement is not consistent with HUD standards, HUD standards will take precedence.

#### **Consumer Notice**

The Consumer Notice explains the reason for asking for personal information and notifies the client of the Privacy Statement. HPAC requires that agencies either adopt HPAC's standard Consumer Notice or adopt their own Consumer Notice, which meets all of the minimum requirements set forth in HUD's 2004 HMIS Data and Technical Standards Final Notice<sup>6</sup>.

In addition to having a Consumer Notice, HPAC requires that participating HMIS agencies post the Consumer Notice at each intake desk(s) or a comparable location(s). Lastly, HPAC requires that all staff have access to hard copies of the Consumer Notice when out in the field.

#### **List of Participating Agencies**

The List of Participating Agencies names all current HMIS using providers, which allows clients to see which organizations have access to their information. The HMIS Daily Operator will provide updated lists when necessary.

HPAC requires that participating HMIS agencies post the List of Participating Agencies at each intake desk(s) or a comparable location(s). Lastly, HPAC requires that all staff have access to hard copies of the List of Participating Agencies when out in the field.

#### Informed Consent and Release of Information Authorization

The Informed Consent and Release of Information Authorization must be signed by all adult clients and unaccompanied youth. This gives the client the opportunity to refuse the sharing of his or her information to

https://www.hudexchange.info/resources/documents/2004HUDDataandTechnicalStandards.pdf

<sup>&</sup>lt;sup>6</sup> 2004 HMIS Data and Technical Standards Final Notice:

other agencies within the system. HPAC requires client signatures prior to inputting their information in HMIS. HPAC also requires agencies to update Informed Consent and Release of Information Authorization forms every five years.

## **Privacy and Security Safeguards**

This section describes the various safeguards in place to protect the privacy and security of the information collected and stored in HMIS. It is important to note that all agency executive directors or program managers are responsible for understanding these safeguards and effectively communicating these safeguards to individuals responsible for privacy and security at their agency.

It is also important to underscore that all HMIS Partner Agencies must apply the safeguards explained below. Additionally, HPAC expects that agencies apply the safeguards to all networked devices. This includes, but is not limited to, networks, desktops, laptops, mobile devices, tablets, mainframes, and servers.

## **Physical Safeguards**

In order to protect client privacy, agencies must implement the following physical safeguards. For the purposes of this section, HPAC defines authorized users as HMIS End Users who have received the New End User Training and have signed New End User Agreements on file with the HMIS System Administrator.

## **Computer Location**

A computer used as an HMIS workstation must be in a secure location where only authorized staff members have access. The workstation must not be accessible to clients, the public, or volunteers. HPAC also requires that any computer accessing HMIS enable a password protected automatic screensaver.

# **Printer Location**

HPAC requires that users send HMIS documents to a printer located in a secure location where only authorized staff members have access.

#### **Monitor**

Non-authorized users should not be able to see an HMIS workstation screen. HPAC advises users to turn monitors away from the public view and utilize visibility filters to protect client privacy.

#### **Mobile Device**

A mobile device and/or tablet used to access and enter information into HMIS must use a password or other user authentication on the lock screen to prevent an unauthorized person from accessing it. In addition, the device and/or tablet should be set to automatically lock after a set period of inactivity. HPAC also recommends that users download a remote wipe and/or remote disable option onto the device.

#### **Technical Safeguards**

#### **Workstation Security**

To promote the security of HMIS and the confidentiality of the data contained therein, HPAC will only allow access to HMIS through approved workstations. To ensure compliance, the HMIS System Administrator will enlist the use of an IP Address Whitelist or another suitably secure method to identify approved workstations, in compliance with Public Access baseline requirement in the HUD Data Standards (4.3.1 System Security). Users will be required to submit the IP Address of their workstation to the HMIS System Administrator to be registered into the system and will notify the System Administrator should this number need to be changed.

#### **Establishing HMIS User IDs and Access Levels**

HPAC prohibits the sharing of usernames and passwords by or among more than one end user. To that end, the HMIS System Administrator will assign the most restrictive access level, while still allowing the end user to efficiently and effectively perform his or her duties.

#### **User Authentication**

- Usernames are individual and passwords are confidential. No individual should ever use or allow use of a
  username that is not assigned to that individual and passwords should never be shared or
  communicated in any format
- The system requires users to change temporary passwords upon first use. Passwords must be a minimum of six (6) characters long and must contain a combination of upper case and lower case letters, a number, and a symbol
- End users will be prompted by the software to change their password every ninety (90) days
- End Users must immediately notify the HMIS System Administrator if they have reason to believe that someone else has gained access to their password
- Three consecutive unsuccessful attempts to login will disable the username until the HMIS Daily Operator resets the password
- End users must log out from the HMIS application and either lock or log off their respective workstation
  if they leave. If the user logged into HMIS and the period of inactivity in HMIS exceeds 45minutes, the
  user will be logged off the HMIS system automatically

## **Rescinding User Access**

- The Partner Agency will notify the HMIS System Administrator at least 24-hours if an end user no longer requires access to perform his or her assigned duties due to a change of job duties or termination of employment.
- The HMIS System Administrator reserves the right to terminate end user licenses that are inactive for 60 days or more
- The HMIS System Administrator will attempt to contact the Partner Agency for the end user in question prior to termination of the user's license
- In the event of suspected or demonstrated noncompliance by an end user with the HMIS End User
  Agreement or any other HMIS plans, forms, standards or governance documents, the Partner Agency
  Security Officer must notify the HMIS System Administrator to deactivate the user's license while the
  Partner Agency Security Office conducts an internal agency investigation
- Any user found to have misappropriated client data (identity theft, releasing personal client data to any unauthorized party) will have his or her HMIS privileges revoked
- HPAC is empowered to permanently revoke a Partner Agency's access to HMIS for substantiated noncompliance with the provisions of this Plan that resulted in a release of PPI

#### Disposing Electronic, Hardcopies, Etc.

- Computer: All technology equipment (including computers, printers, copiers and fax machines) used to
  access HMIS and which will no longer be used to access HMIS will have their hard drives reformatted
  multiple times. If the device is now non-functional, it must have the hard drive pulled, destroyed and
  disposed of in a secure fashion
- Hardcopies: For paper records, shredding, burning, pulping, or pulverizing the records so that PPI is rendered essentially unreadable, indecipherable, and otherwise cannot be reconstructed
- Mobile Devices: Use software tools that will thoroughly delete/wipe all information on the device and return it to the original factory state before discarding or reusing the device

#### **Other Technical Safeguards**

- HPAC requires that each HMIS Partner Agency develop and implement procedures for managing new, retired, and compromised local system account credentials
- HPAC requires that each HMIS Partner Agency develop and implement procedures that will prevent unauthorized users from connecting to private agency networks
- Unencrypted PPI may not be stored or transmitted in any fashion—including sending file attachments by
  email or downloading reports including PPI to a flash drive, to the End User's desktop or to an agency
  shared drive. All downloaded files containing PPI must be deleted from the workstation temporary files
  and the "Recycling Bin" emptied before the End User leaves the workstation

## **Disaster Recovery Policy**

The HMIS System Administrator is responsible for facilitating recovery from a disaster with support from the HMIS software vendor as needed. As such, the System Administrator must:

- Be aware of and be trained to complete any tasks or procedures for which they are responsible in the event of a disaster
- Have a plan for restoring local computing capabilities and internet connectivity for the HMIS System Administrator's facilities
- Maintain a readily accessible list of account numbers and contact information for its internet service provider, support contracts, and equipment warranties
- Maintain a list of the computer and network equipment required to restore minimal access to HMIS and to continue providing services to HMIS Partner Agencies
- Maintain documentation of the configuration settings required to restore local user accounts and internet access

#### **Workforce Security Policy**

#### **HMIS Access to Active Clients**

HPAC has an open HMIS system and most HMIS Users have access to client's current or past history from other agencies. With the goal of protecting the security and integrity of the HMIS system and safeguarding the personal information contained therein, HPAC will no longer give HMIS access to individuals who are actively receiving services from any HMIS partner agency with an active record in either the HPAC or Sacramento CoC HMIS.

- The HMIS System Administrator will search the individual in HMIS before issuing HMIS access
- The HMIS System Administrator will deny access to individuals who are active in HMIS

#### **Background Check Policy**

#### **HMIS End User Background Check Requirements**

HPAC recognizes the sensitivity of the data in HMIS, and therefore requires that the individuals responsible for managing HMIS be subject to a criminal background check.

The HMIS System Administrator will deny access to HMIS if a staff member's background check reveals a history of any of the following crimes:

- Bank Fraud: To engage in an act or pattern of activity where the purpose is to defraud a bank of funds
- Blackmail: A demand for money or other consideration under threat to do bodily harm, to injure property, to accuse of a crime, or to expose secrets

- Bribery: When an individual offers money, goods, services, information or anything else of value with intent to influence the actions, opinions, or decisions of the taker. You may be charged with bribery whether you offer the bribe or accept it
- Computer fraud: Where computer hackers steal information sources contained on computers such as: bank information, credit cards, and proprietary information
- Credit Card Fraud: The unauthorized use of a credit card to obtain goods of value
- Extortion: Occurs when one person illegally obtains property from another by actual or threatened force, fear, or violence, or under cover of official right
- Forgery: When a person passes a false or worthless instrument such as a check or counterfeit security with the intent to defraud or injure the recipient
- Health Care Fraud: Where an unlicensed health care provider provides services under the guise of being licensed and obtains monetary benefit for the service
- Larceny/Theft: When a person wrongfully takes another person's money or property with the intent to appropriate, convert or steal it
- Money Laundering: The investment or transfer of money from racketeering, drug transactions or other embezzlement schemes so that it appears that its original source either cannot be traced or is legitimate
- Telemarketing Fraud: Actors operate out of boiler rooms and place telephone calls to residences and
  corporations where the actor requests a donation to an alleged charitable organization or where the
  actor requests money up front or a credit card number up front, and does not use the donation for the
  stated purpose
- Welfare Fraud: To engage in an act or acts where the purpose is to obtain benefits (i.e. Public Assistance, Food Stamps, or Medicaid) from the State or Federal Government

In order to comply with this safeguard, HMIS Partner Agencies must have a policy regarding conducting background checks and hiring individuals with criminal justice histories. The policy should require that all end users have a background check prior to requesting HMIS access.

#### **Monitoring**

HPAC will monitor adherence to the Plan using the following structure and measures.

#### **Roles and Responsibilities**

#### **HMIS System Administrator**

As the HMIS System Administrator, SSF:

- Prevents degradation of the system resulting from viruses, intrusion, or other factors within the System Administrator's control
- Prevents inadvertent release of confidential client-specific information through physical or electronics access to system servers

## **HMIS Daily Operator**

As the HMIS Daily Operator, the County of Yolo:

 Provides technical assistance to agencies and users who need assistance complying with HPAC's Privacy and Security Plan

#### **HPAC Data Subcommittee**

As an advisory group to the full HPAC body, the Data Subcommittee:

• Makes annual recommendations to the full HPAC body regarding revisions to the Plan

- Monitors agencies and users to ensure adherence to the roles and responsibilities delineated within HPAC's Privacy and Security Plan
- Develops technical assistance, action and/or compliance plans for agencies that the Data Subcommittee finds to be in violation of HPAC's Privacy and Security Plan

## **HMIS Partner Agency**

The HMIS Partner Agency:

- Prevents degradation of the HMIS resulting from viruses, intrusion, or other factors within the agency's control and prevents the inadvertent release of confidential client-specific information through physical, electronic or visual access to user workstations
- Ensures the agency meets the privacy and security requirements detailed in the HUD HMIS Data and Technical Standards
- Adopts and upholds a Privacy Statement, which meets or exceeds all minimum standards including substance use providers covered by 24 CFR Part 2, HIPPA covered agencies
  - Modifications to HPAC's standard Privacy Statement must be approved by the HPAC Data Subcommittee
- Ensures that all clients are aware of the adopted Privacy Statement and have access to it
  - o If the agency has a website, the agency must publish the Privacy Statement on their website
- Makes reasonable accommodations for persons with disabilities, language barriers, or education barriers
- Ensures that anyone working with clients covered by the Privacy Statement can meet the user responsibilities
- Designates at least one Security Officer that has been trained to technologically uphold the adopted Privacy Statement

#### **HMIS End User**

HPAC defines an HMIS end user as a person that has direct interaction with a client and/or his or her data including but not limited to PPI. Therefore, an end user:

- Reads and understands his or her agency's Privacy Statement
- Has the ability to explain his or her agency's Privacy Statement to clients
- Adheres to his or her agency's Privacy Statement
- Knows where to refer a client if he or she cannot answer a question
- Completes an Informed Consent and Release of Information Authorization with a client prior to collecting and inputting HMIS data
- Presents his or her agency's Privacy Statement to a client before collecting any information
- Upholds a client's privacy in HMIS

#### **Security Officers**

To further assist with the monitoring, all HMIS Partner Agencies must designate a Partner Agency Security Officer to ensure adherence to HPAC's Privacy and Security Plan.

#### **Lead Security Officer**

- May be the HMIS System Administrator or another employee, volunteer or contractor designated by SSF who has completed HMIS Privacy and Security training and is adequately skilled to assess HMIS security compliance
- Assesses security measures in place prior to establishing access to HMIS for a new Agency

- Reviews and maintains file of Partner Agency annual compliance certification checklists
- Conducts annual security audit of all Partner Agencies

## **Partner Agency Security Officer**

- May be the Partner Agency HMIS Agency Administrator or another Partner Agency employee, volunteer
  or contractor who has completed HMIS Privacy and Security training and is adequately skilled to assess
  HMIS security compliance,
- Conducts a security audit for any workstation that will be used for HMIS purposes
  - No less than semiannually for all agency HMIS workstations
  - o Prior to issuing a User ID to a new HMIS End User
  - Any time an existing user moves to a new workstation
- Continually ensures each workstation within the Partner Agency used for HMIS data collection or entry
  is adequately protected by a firewall and antivirus software (per Technical Safeguards—Workstation
  Security)
- Completes the semiannual Compliance Certification Checklist, and forwards the Checklist to the Lead Security Officer

Upon request, the HMIS Lead Agency may be available to provide Security support to Partner Agencies who do not have the staff capacity or resources to fulfill the duties assigned to the Partner Agency Security Officer.

- Partner Agency Security Officer will confirm that any workstation accessing HMIS shall have antivirus software with current virus definitions (updated at minimum every 24 hours) and frequent full system scans (at minimum weekly)
- Partner Agency Security Officer will confirm that any workstation accessing HMIS has and uses a
  hardware or software firewall; either on the workstation itself if it accesses the internet through a
  modem or on the central server if the workstation(s) accesses the internet through the server

## **New HMIS Partner Agency Site Security Assessment**

Prior to establishing access to HMIS for a new Partner Agency, the Lead Security Officer will assess the security measures in place at the Partner Agency to protect client data (see Technical Safeguards—Workstation Security). The Lead Security Officer or other HMIS System Administrator will meet with the Partner Agency Executive Director (or executive-level designee) and Partner Agency Security Officer to review the Partner Agency's information security protocols prior to countersigning the HMIS Memorandum of Understanding. This security review shall in no way reduce the Partner Agency's responsibility for information security, which is the full and complete responsibility of the Partner Agency, its Executive Director, and its HMIS Agency Security Officer.

#### **Semiannual Partner Agency Self-Audits**

- The Partner Agency Security Officer will use the Compliance Certification Checklist to conduct semiannually security audits of all Partner Agency HMIS End User workstations.
- The Partner Agency Security Officer will audit for inappropriate remote access by End-Users by associating User login date/times with employee time sheets. End Users must certify that they will not remotely access HMIS from a workstation (i.e. personal computer) that is not subject to the Partner Agency Security Officer's regular audits.
- If areas are identified that require action due to noncompliance with these standards or any element of the HPAC HMIS Policies and Procedures, the Partner Agency Security Officer will note these on the Checklist, and the Partner Agency Security Officer and/or HMIS Agency Administrator will work to resolve the action item(s) within fifteen (15) days

- Any Checklist that includes one or more findings of noncompliance and/or action items will not be
  considered complete until all action items have been resolved. The findings, action items, and resolution
  summary must be reviewed and signed by the Agency's Executive Director or other empowered officer
  prior to being forwarded to the Lead Security Officer
- The Partner Agency Security Officer must turn in a copy of the Checklist to the Lead Security Officer on a semiannual basis

## **Annual Security Audits**

- The Lead Security Officer will schedule the annual security audit in advance with the Partner Agency Security Officer
- The Lead Security Officer will use the Compliance Certification Checklist to conduct security audits
- The Lead Security Officer must randomly audit at least 10% of the workstations used for HMIS data entry for each HMIS Partner Agency. In the event that an agency has more than one project site, at least one workstation per project site must be audited
- If areas are identified that require action due to noncompliance with these standards or any element of the HPAC HMIS Policies and Procedures, the Lead Security Officer will note these on the Checklist, and the Partner Agency Security Officer and/or HMIS Agency Administrator will work to resolve the action item(s) within fifteen (15) days
- Any Checklist that includes one or more findings of noncompliance and/or action items will not be
  considered complete until all action items have been resolved and the findings, action items, and
  resolution summary has been reviewed and signed by the Agency's Executive Director or other
  empowered officer and forwarded to the HMIS Lead Security Officer

## **Reporting Security Incidents**

While HPAC intends for the monitoring to prevent, to the greatest degree possible, any security incidents, should a security incident occur, an agency should comply with the following reporting procedures:

- Any user who becomes aware of or suspects a compromise in HMIS security and/or client privacy must immediately report the concern to their agency's Security Officer.
- In the event of a suspected security or privacy concern, the agency Security Officer should complete an internal investigation
- If the suspected security or privacy concern resulted from a user's suspected or demonstrated noncompliance with the HMIS End User Agreement, the Security Officer should have the HMIS System Administrator deactivate the user's account until the internal investigation has been completed
- Following the internal investigation, the Security Officer should notify the Lead Security Officer of any substantiated incidents that may have compromised HMIS system security and/or client privacy whether or not a release of client PPI is definitively known to have occurred
- If the security or privacy concern resulted from demonstrated noncompliance by a user with a signed HMIS End User Agreement, the Lead Security Officer reserves the right to permanently deactivate the user account for the user in question
- Within one business day after the Lead Security Officer receives notice of the security or privacy concern, the Lead Security Officer and Partner Agency Security Officer will jointly establish an action plan to analyze the source of the security or privacy concern and actively prevent such future concerns
- The user or agency must implement the action plan as soon as possible, and the total term of the plan must not exceed thirty (30) days

- If the user or agency is not able to meet the terms of the action plan within the time allotted, the HMIS
  System Administrator, in consultation with the full HPAC body, may elect to terminate the agency's
  access to HMIS
- The agency may appeal to HPAC for reinstatement to HMIS following completion of the requirements of the action plan
- In the event of a substantiated release of PPI in noncompliance with the provisions of the HPAC's Privacy and Security Plan, this manual, or the Privacy Statement, the Security Officer will make a reasonable attempt to notify all impacted individual(s)
- The Lead Security Officer must approve of the method of notification and the agency Security Officer must provide the Lead Security Officer with evidence of the agency's notification attempt(s)
- If the Lead Security Officer is not satisfied with the agency's efforts to notify impacted individuals, the Lead Security Officer will attempt to notify impacted individuals at the agency's expense
- The HMIS System Administrator will notify HPAC of any substantiated release of PPI in noncompliance with the provisions of HPAC's Privacy and Security Plan, this manual, or the Privacy Statement
- The HMIS System Administrator will maintain a record of all substantiated releases of PPI in noncompliance with the provisions of HPAC's Privacy and Security Plan, this manual, or the Privacy Statement for 7 years
- HPAC reserves the right to permanently revoke an agency's access to HMIS for substantiated noncompliance with the provisions of HPAC's Privacy and Security Plan, this manual, or the Privacy Statement that resulted in a release of PPI



# **Yolo County Homeless and Poverty Action Coalition (HPAC)**

Davis/Woodland/Yolo County Continuum of Care (CA-521)

The Housing Authority of Yolo County (serving the jurisdiction of the CA-521 Davis/Woodland/Yolo County CoC) does not offer a limited homeless preference.



# **Yolo County Homeless and Poverty Action Coalition (HPAC)**

Homeless Management Information System (HMIS) Policies and Procedures Manual

Davis/Woodland/Yolo County Continuum of Care (CA-521) *Adopted August 24, 2016* 

# **Table of Contents**

Overview	3
Introduction	3
What is HMIS	3
Who Uses HMIS	3
Why HMIS is Important	4
Section 1: HMIS Governance Structure	5
HMIS System Administrator	5
Software	5
Technical	5
Privacy and Security	5
HMIS Lead Agency	6
General	6
HMIS Daily Operator	6
General	6
Technical	6
HPAC Data Subcommittee	6
Section 2: General Operating Policies and Procedures	8
How to Add an Agency	8
How to Add a New Project	8
How to Add a User	8
How to Discontinue an Agency	9
How to Discontinue a Project	9
How to Discontinue a User	9
How to Request Technical Assistance	10
How to Request a Merging of Two Records	10
How to Request a Password Reset	10
How to Submit a Data Request	10
Section 3: HMIS Data Quality Plan	12
HMIS Data Standards	12
Universal Data Elements	

Program-Specific Data Elements	13
Project Descriptor Data Elements	13
Goals and Benchmarks	14
Timeliness	14
Completeness	15
Bed/Unit Utilization Rates	17
Bed Coverage Rates	18
Service-Volume Coverage Rates	18
Other Important Data Quality Practices	18
Annual Verifications	19
Accuracy	19
Monitoring	19
Monitoring Roles and Responsibilities	19
Monitoring Schedule	20
Section 4: HMIS Privacy and Security Plan	21
HMIS Data and Technical Standards	21
Privacy Statement	21
Consumer Notice	23
List of Participating Agencies	23
Informed Consent and Release of Information Authorization	23
Privacy and Security Safeguards	24
Physical Safeguards	24
Technical Safeguards	24
Disaster Recovery Policy	26
Workforce Security Policy	26
Background Check Policy	26
Monitoring	27
Roles and Responsibilities	27
Security Officers	28
New HMIS Partner Agency Site Security Assessment	29
Semiannual Partner Agency Self-Audits	29
Annual Security Audits	30
Reporting Security Incidents	30

# **Overview**

Pursuant to 24 Code of Federal Regulations (CFR) Parts 91, 576, 580, and 583 Interim Rule<sup>1</sup>, this document shall serve as the Homeless Management Information System (HMIS) Policies and Procedures Manual for the Davis/Woodland/Yolo County Continuum of Care (CA-521), hereafter known as the Homeless and Poverty Action Coalition (HPAC).

As a counterpart to HPAC's Policies and Procedures Manual, this document shall be reviewed, revised, and reratified every October with the general manual and governance charter upon a majority vote of all voting members present during the scheduled meeting.

#### Introduction

Given the volume of information included, the manual is divided into four sections:

- Section 1 describes HPAC's HMIS governance structure and the various roles and responsibilities of each entity
- Section 2 reviews several general operating policies and procedures such as how to add a user and how to request technical assistance
- Section 3 features HPAC's Data Quality Plan including local goals and benchmarks for timeliness, completeness, bed/unit utilization, bed coverage rates, and service-volume coverage rates
- Section 4 outlines HPAC's Security and Privacy Plan and the provisions in place to protect the privacy and security of the information collected and stored in HMIS

#### What is HMIS

HMIS is a local information technology system used to collect data on the provision of housing and services to persons and families experiencing homelessness as well as persons and families at risk of experiencing homelessness.

#### **Who Uses HMIS**

The U.S. Department of Housing and Urban Development (HUD) requires the use of HMIS for projects funded by the Continuum of Care (CoC) program, Emergency Solutions Grants (ESG) program, and Housing Opportunities for Persons with AIDS (HOPWA) program.

In 2010, the U.S. Interagency Council on Homelessness (USICH) affirmed HMIS as the official method of measuring outcomes in its Opening Doors: Federal Strategic Plan to Prevent and End Homelessness. Since then many federal agencies that provide homeless services funding have joined together and are working with HUD to coordinate the effort.

As of 2016, the U.S. Department of Veterans Affairs (VA) requires the use of HMIS for projects funded by the Supportive Service for Veteran Families (SSVF) program. The U.S. Department of Health and Human Services (HHS) requires the use of HMIS for projects funded by the Runaway and Homeless Youth (RHY) program and Projects for Assistance in Transition from Homelessness (PATH) program. In addition, many state and local government programs also require HMIS usage.

<sup>&</sup>lt;sup>1</sup> 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578 165

An important exception to the aforementioned entities is victim service providers. Pursuant to 24 CFR Part 578.57<sup>2</sup>, providers assisting victims of domestic violence, dating violence, human trafficking, sexual assault, and stalking victims are prohibited from using HMIS. Rather such providers must use a comparable database.

#### Why HMIS is Important

HMIS is a valuable resource because of its capacity to integrate and de-duplicate data across projects in a designated service area. Communities can use aggregate HMIS data to understand the size, characteristics, and needs of the homeless population at multiple levels: project, system, local, state, and national. The Annual Homeless Assessment Report (AHAR) is HUD's annual report that provides Congress with detailed data on individuals and families experiencing homelessness across the country each year. HUD could not write this report if communities were not able to provide reliable, aggregate data on the clients they serve.

\_

<sup>&</sup>lt;sup>2</sup> 24 CFR Part 578.57 Homeless Management Information System: http://www.ecfr.gov/cgi24bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578\_165

## **Section 1: HMIS Governance Structure**

HPAC's HMIS governance structure features a tripartite composition of the following roles:

- System Administrator
- Lead Agency
- Daily Operator

Pursuant to HPAC's Governance Charter, Sacramento Steps Forward (SSF) serves as the region's HMIS System Administrator; Yolo Community Care Continuum (YCCC) serves as the region's HMIS Lead Agency; and the County of Yolo serves at the region's HMIS Daily Operator.

## **HMIS System Administrator**

As the HMIS System Administrator, SSF:

#### Software

- Selects the HMIS software provider
- Serves as primary liaison between the HMIS software provider and the Partner Agencies
- Contracts with the HMIS software provider to administer and maintain central backup server operations including security procedures and daily system backup to prevent the loss of data

#### **Technical**

- Issues new user accounts and passwords
- Prompts users to periodically change their passwords for security purposes
- Inactivates user accounts after a specified period of inactivity
- Notifies agencies of HMIS failures and/or system errors immediately upon discovery
- Facilitates the initial software training for all new HMIS users
- Provides training materials, including user manuals with definitions and instructions to each individual who attends the initial training

#### **Privacy and Security**

- Maintains all client-identifying information in the strictest of confidence, using the latest available technology
- Monitors access to HMIS in order to detect violations of information security protocols
- Maintains accurate logs of all changes made to the information contained within the database for inspection purposes
- Investigates suspected breaches of confidentiality and suspends HMIS access accordingly
- Develops privacy and security protocols as it pertains to system safety and data integrity

## **HMIS Lead Agency**

As the HMIS Lead Agency, YCCC:

#### General

- Serves as the primary liaison for any HUD-related requirements including submitting the CoC Consolidated Application and the CoC Planning Grant
- Manages and administers all HMIS-related invoicing and payment processing

## **HMIS Daily Operator**

As the HMIS Daily Operator, the County of Yolo:

#### General

- Informs HPAC of key HUD and SSF policies related to HMIS
- Facilitates quarterly HPAC Data Subcommittee meetings to discuss system wide challenges
- Attends SSF HMIS meetings including their HMIS End-Users Meetings and their HMIS and Data
   Committee Meetings
- Shares relevant/important information from SSF HMIS meetings as needed
- Coordinates the collection of data for HUD reports
- Submits reports to HUD as required
- Assists Partner Agencies with HUD or other funding reports and grant applications as needed
- Promotes HMIS usage among all homeless service providers regardless of funding source
- Provides all other reasonably expected activities regarding the day-to-day implementation and operation of HMIS

#### **Technical**

- Serves as the primary liaison between the Partner Agencies and SSF
- Ensures that HPAC is compliant with the latest HMIS data standards as prescribed by HUD and SSF
- Programs new projects according to HUD's latest HMIS Data Standards
- Initiates and maintains interagency data sharing options in HMIS
- Provides refresher trainings as needed, including one-on-one trainings
- Resets usernames and passwords as needed
- Merges duplicate records as needed
- Visits agency sites to learn about/resolve issues as needed
- Provides help desk service by responding within 48 hours of an inquiry
- Works with SSF to develop, implement, and maintain written HMIS policies and procedures including a security and privacy plan as well as a data quality plan in accordance with HUD's final rulings
- Identifies potential data quality issues and recommends actions for improvement.

#### **HPAC Data Subcommittee**

Another component of HPAC's HMIS governance structure is the Data Subcommittee. Serving as an advisory group to the full HPAC body, the Data Subcommittee makes critical recommendations about issues related to HMIS.

The Data Subcommittee's tasks include working with the HMIS System Administrator, HMIS Lead Agency, and HMIS Daily Operator to:

- Annually review this manual and any other HMIS policies and procedures required by HUD and provide recommendations to the full HPAC body for final approval
- Develop and implement a plan for monitoring HMIS to ensure that:
  - HMIS is satisfying the requirements of all regulations and notices issued by HUD
  - The HMIS System Administrator, HMIS Lead Agency, and HMIS Daily Operator are fulfilling the obligations outlined in the HPAC Governance Charter, in the HPAC Policies and Procedures Manual, and in this HPAC HMIS Policies and Procedures Manual
  - O Agencies adhere to HPAC's data quality as well as privacy and security standards, which includes reviewing project reports and/or audits and developing technical assistance plans
- Review and approve the final submission of the following counts and reports:
  - Sheltered and Unsheltered Point-In-Time Counts (PIT)
  - Housing Inventory Count (HIC)
  - Annual Homeless Assessment Report (AHAR)
  - Annual HUD System Performance Measures Report

Comprised of at least one representative from each HMIS Partner Agency, the Data Subcommittee meets on a quarterly basis, on the third Wednesday of January, April, July and October from 8:30 to 9:30 a.m. among rotating locations in Davis, West Sacramento, and Woodland. The County of Yolo's Homeless Analyst staffs the Data Subcommittee by scheduling the meetings, creating the agendas, facilitating the discussions, recording the minutes, and sharing recommendations with the full HPAC body.

# **Section 2: General Operating Policies and Procedures**

The following subsections describe several of HPAC's general HMIS operating policies and procedures.

## How to Add an Agency

To add an agency to HPAC's HMIS, the agency under consideration must complete the following steps and/or agree to the following stipulations:

- 1. Contact the HMIS Daily Operator
- 2. Read the following HPAC documents:
  - HPAC Governance Charter
  - HPAC Policies and Procedures Manual
  - HPAC HMIS Policies and Procedures Manual
- 3. Complete and submit the following forms to the HMIS Daily Operator:
  - SSF New Project Agency Add Form
  - HPAC HMIS Agency Partner Agreement
  - HPAC Interagency HMIS Data Sharing Agreement
- 4. Adopt either HPAC's standard Privacy Statement (provided by the Homeless Analyst) or your own agency-specific Privacy Statement that satisfies all of the criteria listed in the 2004 HMIS Data and Technical Standards (see Section 4: HMIS Privacy and Security—Privacy Statement)
- 5. Post the Privacy Statement, along with the Consumer Notice and List of Participating Agencies (provided by the Homeless Analyst) at your intake desk(s) or comparable location(s)
- 6. If your agency maintains an agency website, post a link to the Privacy Statement on the homepage of the agency's website
- 7. Agree to ensure that hard copies of the Privacy Statement, Consumer Notice, and List of Participating Agencies are available upon a client's request
- 8. Agree to the cost/invoicing process as explained below:
  - As the HMIS Lead Agency, YCCC oversees the cost/invoicing process. As such, YCCC invoices on a
    quarterly basis during the months of January, April, July, and October. All payments are due to
    YCCC upon receipt of the invoice. An HMIS Lead Agency cannot fund HMIS utilization on behalf
    of any other agency.
  - The cost breakdown for each agency is based on:
    - A one-time user activation fee of \$175 per user
    - o A CoC fee of \$5,400 divided equally among the number of Partner Agencies
    - o A user fee of \$30 per user per month

#### How to Add a New Project

To add a new project to an already existing agency:

- 1. Contact the HMIS Daily Operator
- 2. Read, complete, and submit the following form to the HMIS Daily Operator:
  - SSF New Project Add Form
    - Please note the form does not need to be complete upon submittal. Typically, programming a new project is an iterative process that requires several revisions to ensure accurate tracking of outcomes

## How to Add a User

To add a user to an already existing agency:

- 1. Contact the HMIS Daily Operator
- 2. Read, complete, and submit the following forms to the HMIS Daily Operator for each new user:
  - SSF HMIS User Account Request Form
  - SSF HMIS User's Agreement
    - Please note this form requires a Human Resources representative or Executive Director to sign the agreement, attesting that the agency conducted a criminal background check on the new user(s)
    - The HMIS System Administrator will deny HMIS access to any potential new users who
      pleaded no contest or were convicted of any fraud (including identity theft) or stalking
      related felony crimes punishable by imprisonment of one year or more in any state (see
      Section 4: HMIS Privacy and Security—Background Check)
    - The HMIS Daily Operator will forward the completed paperwork to SSF by emailing hmis@sacstepsfoward.org and copying the new user(s)
- 3. Signup for a New End-User Training by visiting <a href="https://sac.clarityhs.com/login">https://sac.clarityhs.com/login</a> and completing the online RSVP form
  - As the HMIS System Administrator, SSF facilitates all new user trainings and requires participation in the training prior to receiving access to the local HMIS
  - At the training, the new user(s) will receive his or her username(s) and password(s)
  - SSF typically schedules the trainings on the third Friday of every month

## **How to Discontinue an Agency**

To discontinue an agency:

- 1. Send a message to the HMIS Daily Operator containing the following information:
  - Reason for discontinuation
  - Official date agency wishes to discontinue use
    - Prior to contacting the HMIS Daily Operator, please ensure that your agency exited all active clients for each project(s). To do so, run a "Program Roster" report and select the "Active" status for each project(s)
- 2. The HMIS Daily Operator will then share the message with the HMIS Lead Agency
  - Together, the agency, the HMIS Lead Agency, and the HMIS Daily Operator will determine the appropriate final payment amount and agree upon a final date for discontinued use
  - As the cost/invoicing process is on a quarterly schedule, agencies may have to wait until the end
    of a quarter to discontinue use

## **How to Discontinue a Project**

To discontinue a project:

- 1. Send a message to the HMIS Daily Operator containing the following information:
  - Name of project to be discontinued
  - Reason for discontinuation
  - Official date project ended
    - Prior to contacting the HMIS Daily Operator, please ensure that your agency exited all active clients for each project. To do so, run a "Program Roster" report and select the "Active" status

#### How to Discontinue a User

To discontinue a user:

- 1. Send a message to the HMIS Daily Operator containing the following information:
  - Name of user to be discontinued
  - Reason for discontinuation
  - If applicable, date of separation to ensure activation is not terminated preemptively

## **How to Request Technical Assistance**

To request technical assistance:

- 1. Send a message to the HMIS Daily Operator containing the following information:
  - Detailed summary of the issue
  - If applicable, client unique ID number(s)
  - Call back number
  - Please indicate if the issue is urgent e.g. need to submit a report by a particular deadline
    - The HMIS Daily Operator will respond to your request within 48 hours of receipt unless it is a county-recognized holiday and/or the agency receives an out of office reply

## How to Request a Merging of Two Records

To request a merging of two records:

- 1. Send a message to the HMIS Daily Operator containing the following information:
  - Name
  - Client unique ID numbers of the records to be merged
    - o Please indicate which record the user thinks should be the surviving record
  - Please indicate if the issue is urgent e.g. need to submit a report by a particular deadline
    - o The HMIS Daily Operator will respond to your request within 48 hours of receipt unless it is a county-recognized holiday and/or the agency receives an out of office reply

# **How to Request a Password Reset**

To request a password reset:

- 2. Send a message to the HMIS Daily Operator containing the following information:
  - Name
  - Please indicate if the issue is urgent e.g. need to submit a report by a particular deadline
    - The HMIS Daily Operator will respond to your request within 48 hours of receipt unless it is a county-recognized holiday and/or the agency receives an out of office reply
    - The HMIS Daily Operator will respond with a username and a temporary password.
       Upon logging in, the system will prompt the user to enter a new password

#### **How to Submit a Data Request**

To submit a data request:

- 1. Send a message to the HMIS Daily Operator containing the following information:
  - Detailed summary of data request including:
    - Purpose of the data request
    - Authority who approved this request
    - Requested report period
    - o Preferred format for the data file
    - Indicate if this is a system wide report, if not, what project types should be included e.g. only HUD-funded projects

- o Indicate what data elements need to be included
- o Indicate if you would like unduplicated data or all records collected
- o Due date
- Call back number
- Please indicate if the issue is urgent e.g. need to submit a report by a particular deadline
  - The HMIS Daily Operator will respond to your request within 48 hours of receipt unless it is a county-recognized holiday and/or the agency receives an out of office reply

# **Section 3: HMIS Data Quality Plan**

This section describes HPAC's HMIS Data Quality Plan. Developed by the HPAC Data Subcommittee in coordination with the HMIS System Administrator, HMIS Lead Agency, and HMIS Daily Operator, the Plan represents a system-level document that enhances HPAC's ability to achieve statistically valid and reliable data. As such, the Plan:

- Establishes specific data quality benchmarks for timeliness, completeness, bed/unit utilization, bed coverage rates, and service-volume coverage rates
- Describes the procedures for implementing the plan and monitoring progress toward meeting the benchmarks

As stated at the beginning of this manual, HPAC will review, revise, and re-ratify its HMIS Data Quality Plan every October upon a majority vote of all voting members present during the scheduled meeting. Prior to HPAC's vote, the Data Subcommittee will recommend updates to the full HPAC body according to HUD's latest HMIS Data Standards and locally developed performance plans.

#### **HMIS Data Standards**

Published in 2014, HUD's HMIS Data Standards serve as the basis for HPAC's Data Quality Plan. Since HUD is responsible for setting forth guidelines regarding HMIS usage, the Standards outline the minimum participation and reporting requirements.

The Standards include three primary components: (1) Universal Data Elements, (2) Program-Specific Data Elements, and (3) Project Descriptor Data Elements.

#### **Universal Data Elements**

The Universal Data Elements establish the baseline collection requirements for all agencies entering data into HMIS. In this way, the Universal Data Elements provide the foundation for producing unduplicated estimates of the number of homeless persons receiving services, basic demographic information, and patterns of use such as the length of project stays, exits to permanent housing, chronicity, and the number of homeless episodes over time.

The required Universal Data Elements include:

- 3.1 Name
- 3.2 Social Security Number
- 3.3 Date of Birth
- 3.4 Race
- 3.5 Ethnicity
- 3.6 Gender
- 3.7 Veteran Status
- 3.8 Disabling Condition
- 3.9 Residence Prior to Project Entry
- 3.10 Project Entry Date
- 3.11 Project Exit Date
- 3.12 Destination
- 3.13 Personal ID
- 3.14 Household ID
- 3.15 Relationship to Head of Household
- 3.16 Client Location

3.17 Length of Time on Street, in an Emergency Shelter or Safe Haven

## **Program-Specific Data Elements**

Program-Specific Data Elements differ from Universal Data Elements in that no one project must collect every single element in this subsection. Which data elements are required is dictated by the reporting requirements set forth by the project funder.

Many of these data elements represent transactions or information that may change over time. Most agencies capture Program-Specific Data Elements at project entry and exit, but a few must be captured at project entry, exit, and on an annual basis.

The required Program-Specific Data Elements include:

- 4.1 Housing Status
- 4.2 Income and Sources
- 4.3 Non-Cash Benefits
- 4.4 Health Insurance
- 4.5 Physical Disability
- 4.6 Developmental Disability
- 4.7 Chronic Health Condition
- 4.8 HIV/AIDS
- 4.9 Mental Health Condition
- 4.10 Substance Abuse
- 4.11 Domestic Violence
- 4.12 Contact
- 4.13 Date of Engagement
- 4.14 Services Provided
- 4.15 Financial Assistance Provided
- 4.16 Referrals Provided
- 4.17 Residential Move-In Date
- 4.18 Housing Assessment Disposition
- 4.19 Housing Assessment at Exit

## **Project Descriptor Data Elements**

Project Descriptor Data Elements contain basic information about projects participating in a region's HMIS and help ensure HMIS is the central repository of information about homelessness. The Project Descriptor Data Elements very much represent the building blocks of HMIS. They enable the system to:

- Associate client-level records with the various projects that a client will enroll in across a service area
- Clearly define the type of project the client is associated with the entire time he or she received housing and/or services
- Identify which federal partner programs are providing funding to the project
- Track bed and unit inventory and other information, by project, which is relevant for:
  - Sheltered and Unsheltered Point-In-Time Counts (PIT)
  - Housing Inventory Count (HIC)
  - Annual Homeless Assessment Report (AHAR)
  - Data Quality Monitoring Reports
  - System Performance Measures Report

The HMIS Daily Operator and/or HMIS System Administrator, not the agency or user, generally enters and manages Project Descriptor Data Elements. As such, the HMIS Daily Operator and/or HMIS System Administrator enter this information upon project setup, but will conduct an annual verification of the information and update the information as needed (see Other Important Data Quality Practices—Annual Verifications).

The required Project Descriptor Data Elements include:

- 2.1 Organization Identifiers
- 2.2 Project Identifiers
- 2.3 Continuum of Care Code
- 2.4 Project Type
- 2.5 Method for Tracking Emergency Shelter
- 2.6 Federal Partner Funding Sources
- 2.7 Bed and Unit Inventory Information
- 2.8 Site Information Optional
- 2.9 Target Population

#### **Goals and Benchmarks**

#### **Timeliness**

Timeliness refers to how much time elapses from when a user collects data from a client to when a user inputs the data into HMIS. Thus, the system compares the difference between the project entry/exit date specified for the client and the date the user enters the information into HMIS. For example, if a user inputted a project entry date of April 4 (the date of the client's intake assessment), but the current date is April 9, then there would be a five (5) day lag time in entering the data.

There are numerous reasons why timely data entry is important. First, it minimizes the likelihood of human error that can occur when too much time has passed between the data collection and the data entry. Timely data entry also ensures that the data is readily accessible, whether for monitoring purposes or for meeting funding requirements. Lastly, timeliness is a critical component of coordinated entry as it relies on up-to-date bed/unit availability in order to make referrals.

While HPAC highly encourages live data entry, HPAC acknowledges that there are circumstances when live data entry may not be possible. As such, HPAC set the following goal and corresponding benchmarks for each project type:

Goal	At least 95% of all data entry should fall within the specified timeliness benchmarks
------	---

Project Type	Benchmark
Emergency Shelter	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit
Transitional Housing  Agency to enter all Universal Data Elements and Project-Specific	
Permanent Housing	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit

Permanent Supportive Housing	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit		
Prevention and Rapid Re-Housing	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit		
Street Outreach	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit		
Supportive Services Only	Agency to enter all Universal Data Elements and Project-Specific Data Elements within three (3) days of intake and/or exit		

It is important to note that users cannot back enter or edit data to fix timeliness. Rather users can only strive to improve data timeliness for future entries.

## **Completeness**

Completeness refers to the number of "Missing/Data Not Collected" and "Client Doesn't Know/Client Refused" responses collected for both the required Universal Data Elements and Project-Specific Data Elements.

Complete data is key to assisting clients end their homelessness. Not only does incomplete data hinder an agency's ability to provide comprehensive care, but incomplete data also negatively affects HPAC's ability to identify service deficiencies and devise effective strategies for improvement. In addition, HMIS data quality is a component of most federal funding applications and low HMIS data quality scores may affect renewal funding as well as future funding requests. Given its importance, HPAC set the following goal and corresponding benchmarks for each project type and data element.

Goal	At least 95% of all data entry should fall within the specified completeness benchmarks
------	---

	Benchmark					
Universal Data Element	Emergency Shelter and Non-HUD Supportive Services Only		HUD Supportive Services Only, Transitional Housing, Permanent Housing, Permanent Supportive Housing, Prevention, and Rapid Re-Housing		Street Outreach	
	Missing/Data Not Collected	Client Doesn't Know/Client Refused	Missing/Data Not Collected	Client Doesn't Know/Client Refused	Missing/Data Not Collected	Client Doesn't Know/Client Refused
3.1 Name	0%	0%	0%	0%	0%	0%
3.2 Social Security Number	0%	0%	0%	5%	0%	5%
3.3 Date of Birth	0%	0%	0%	5%	0%	5%

3.4 Race       0%       0%       5%         3.5 Ethnicity       0%       0%       0%       5%         3.6 Gender       0%       0%       0%       0%         3.7 Veteran Status       0%       0%       0%       5%         3.8 Disabling Condition       0%       0%       0%       5%         3.9 Residence Prior to Project Entry       0%       0%       0%       0%         3.10 Project Entry Date       0%       0%       0%       0%         3.11 Project Exit Date       0%       0%       0%       0%         3.12 Destination       5%       5%       5%         3.15 Relationship to       0%       0%       0%       0%	0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 15%	5% 5% 0% 5% 5% 0% 0%					
3.6 Gender       0%       0%       0%       0%         3.7 Veteran Status       0%       0%       0%       5%         3.8 Disabling Condition       0%       0%       0%       5%         3.9 Residence Prior to Project Entry       0%       0%       0%       0%         3.10 Project Entry Date       0%       0%       0%       0%         3.11 Project Exit Date       0%       0%       0%       0%         3.12 Destination       5%       5%       5%       5%         3.15 Relationship to       0%       0%       0%       0%	0% 0% 0% 0% 0% 0%	0% 5% 5% 0%					
3.7 Veteran Status       0%       0%       0%       5%         3.8 Disabling Condition       0%       0%       0%       5%         3.9 Residence Prior to Project Entry       0%       0%       0%       0%         3.10 Project Entry Date       0%       0%       0%       0%         3.11 Project Exit Date       0%       0%       0%       0%         3.12 Destination       5%       5%       5%       5%         3.15 Relationship to       0%       0%       0%       0%	0% 0% 0% 0%	5% 5% 0%					
3.8 Disabling Condition       0%       0%       5%         3.9 Residence Prior to Project Entry       0%       0%       0%       0%         3.10 Project Entry Date       0%       0%       0%       0%         3.11 Project Exit Date       0%       0%       0%       0%         3.12 Destination       5%       5%       5%       5%         3.15 Relationship to       0%       0%       0%       0%	0% 0% 0% 0%	5% 0% 0%					
3.9 Residence Prior to Project Entry       0%       0%       0%       0%         3.10 Project Entry Date       0%       0%       0%       0%         3.11 Project Exit Date       0%       0%       0%       0%         3.12 Destination       5%       5%       5%       5%         3.15 Relationship to       0%       0%       0%       0%	0% 0% 0%	0%					
Project Entry       0%       0%       0%       0%         3.10 Project Entry Date       0%       0%       0%       0%         3.11 Project Exit Date       0%       0%       0%       0%         3.12 Destination       5%       5%       5%       5%         3.15 Relationship to       0%       0%       0%       0%	0%	0%					
3.11 Project Exit Date     0%     0%     0%       3.12 Destination     5%     5%     5%       3.15 Relationship to     0%     0%     0%	0%						
3.12 Destination 5% 5% 5% 5% 5% 5% 5% 5% 5% 5% 5% 5% 5%		0%					
3.15 Relationship to	150/	070					
	15%	5%					
Head of Household	0%	0%					
3.16 Client Location 0% 0% 0% 0%	0%	0%					
3.17 Length of Time on Street or in an Emergency Shelter  3.17 Length of Time on 0% 0% 0% 0%	0%	0%					
Benchmark	Benchmark						
Program-Specific Data Element  Emergency Shelter and Non-HUD Supportive Services Only Supportive Services Only HUD Supportive Services Only Housing, Permanent Supportive Housing, Prevention, and Rap Re-Housing	ent Street O	Street Outreach					
Missing/Data Not Collected  Client Doesn't Know/Client Refused  Missing/Data Not Collected  Client Does Know/Client Refused		Client Doesn't Know/Client Refused					
	0%	0%					
4.1 Housing Status 0% 0% 0% 0%							
4.1 Housing Status     0%     0%     0%       4.2 Income and Sources     0%     0%     0%	0%	0%					
	0%	0%					
4.2 Income and Sources 0% 0% 0% 0%							
4.2 Income and Sources       0%       0%       0%         4.3 Non-Cash Benefits       0%       0%       0%	0%	0%					

Disability						
4.7 Chronic Health Condition	0%	0%	0%	0%	0%	0%
4.8 HIV/AIDS	0%	0%	0%	0%	0%	0%
4.9 Mental Health Problem	0%	0%	0%	0%	0%	0%
4.10 Substance Use	0%	0%	0%	0%	0%	0%
4.11 Domestic Violence	0%	0%	0%	0%	0%	0%
4.12 Contact	N/A	N/A	N/A	N/A	0%	0%
4.26 Employed	0%	0%	5%	5%	5%	5%

Unlike timeliness, users can fix completeness by back entering or editing data. Thus, HPAC highly encourages users to routinely monitor completeness and update any records that exceed the benchmarks listed above. In some circumstances, this may require staff to re-review paper intake forms or even re-contact the client.

# **Bed/Unit Utilization Rates**

Bed/unit utilization rates compare the number of occupied beds/units to the project's entire bed/unit inventory. Thus, the rates are equal to the number of occupied beds/units divided by the number of total beds/units available.

A core feature of HMIS is its ability to record the number of nights a client stays at a residential housing project. When an agency admits a client into a residential project, HMIS assigns the client a housing service. Named "Housed with—name of the project or funding source," the housing service remains active until the agency exits the client from the project.

Thus, a project's bed/unit utilization rate is an excellent barometer of data quality. A low utilization rate could reflect low occupancy, but it could also indicate that an agency is not entering data into HMIS for every client served. A high utilization rate could reflect that the project is over capacity, but it could also indicate that an agency has not properly exited clients from the project in HMIS. More specifically, bed utilization can legitimately exceed 105% for two main reasons. First, the project offers overflow beds—e.g. cots or mattresses—sporadically throughout the year to accommodate high-demand nights, which results in a larger count of persons than the average number of year-round beds reported on the Housing Inventory Count. Second, the project serves a family with more children than the beds reported as part of the year's Housing Inventory Count. A third reason, related to a data quality issue, is that the project operator is not entering accurate project entry or exit dates, which causes an overlap in stays.

Using HUD's Annual Homeless Assessment Report (AHAR) guidelines, HPAC set the following goal and benchmarks for all residential housing projects.

Goal	100% of all data entry should fall within the specified utilization benchmarks
------	--

Project Type	Benchmark
Emergency Shelter	65 to 105%
Transitional Housing	65 to 105%
Permanent Supportive Housing	65 to 105%

Similar to completeness, users can fix bed/unit utilization rates by back entering or editing data. HPAC highly encourages users to routinely monitor bed/unit utilization rates to ensure true occupancy rates are accurately reflected within HMIS. In addition, HPAC recognizes that new projects may require time to reach their projected occupancy numbers and will not expect them to meet the utilization benchmark during the first six months of operation.

#### **Bed Coverage Rates**

Bed coverage rates compare the total number of beds in HMIS divided by the total bed inventory. The bed coverage rate should account for all HPAC beds in the community, including both HUD and non-HUD funded beds.

This is an important rate to calculate to ensure that HPAC meets HUD's minimum threshold of at least 50% to be eligible for the Annual Homeless Assessment Report (AHAR). Without meeting the 50% threshold, HUD is unable to project estimates for non-HMIS projects with reasonable statistical confidence.

Despite the 50% threshold, HPAC will strive to achieve an even higher standard of 85% as prescribed in HUD's CoC application. The HMIS Daily Operator will calculate these rates annually for the CoC application as well as in preparation for the AHAR.

Goal	At least 85% bed coverage rate for all project types

#### **Service-Volume Coverage Rates**

Service-volume coverage rates compare the number of persons served annually by any given project that participates in HMIS divided by the number of persons served annually by all HPAC projects in the community.

This is an important rate to calculate to ensure that HPAC meets HUD's minimum threshold of at least 50% to be eligible for the Annual Homeless Assessment Report (AHAR). Without meeting the 50% threshold, HUD is unable to project estimates for non-HMIS projects with reasonable statistical confidence.

Despite the 50% threshold, HPAC will strive to achieve an even higher standard of 85% as prescribed in HUD's CoC application. The HMIS Daily Operator will calculate these rates annually for the CoC application as well as in preparation for the AHAR.

Goal At least 85% service-volume coverage rate for all project types	Goal	At least 85% service-volume coverage rate for all project types
--	------	---

#### **Other Important Data Quality Practices**

HPAC will implement two other important practices as part of its HMIS Data Quality Plan. The practices involve an annual verification of Project Descriptor Data Elements and residential housing projects as well as establishing local standards regarding accuracy.

# **Annual Verifications**

Every year prior to the Annual Homeless Assessment Report (AHAR), the HMIS Daily Operator will request agencies to verify their Project Descriptor Data Elements (see Section 3: HMIS Data Quality Plan—Project Descriptor Data Elements) as well as their inventory of residential housing projects.

This practice will ensure that bed/unit utilization rates are accurate and therefore AHAR reporting is accurate. Collecting such information will also be helpful for the numerous annual reports required by HUD including the Point-In-Time Count (PIT), the Housing Inventory Count (HIC), and the System Performance Measure Report.

# **Accuracy**

HMIS data needs to accurately represent the clients served and the services provided. The best way to measure accuracy is to compare the HMIS data with primary sources such as a social security card, birth certificate, or driver's license. To ensure the most up-to-date and complete data, HPAC recommends internal data quality monitoring on a monthly basis.

Another important aspect of maintaining data integrity is collecting and entering data in a common and consistent manner across all projects. To that end, the HPAC Data Subcommittee will regularly review best practices and discuss common problems.

Some important things to note regarding accuracy include:

- All Universal Data Elements and Program Specific Data Elements must be obtained from each adult and unaccompanied youth who apply for services
- Most Universal Data Elements are also required for children age 17 years and under
- Most Universal Data Elements and Program-Specific Data Elements include a "Client Doesn't Know" or "Client Refused" response category. HUD considers these valid responses if the client does not know or the client refuses to respond to the question. It is not the intention of HUD, or any other funders who require HMIS usage, to have agencies deny clients assistance if they refuse or are unable to supply the information. However, some information may be required by projects or public or private funders to determine eligibility for housing or services, or to assess needed services.
- Agencies should not use the "Client Doesn't Know" or "Client Refused" responses to indicate that the case manager or data entry staff member does not know the client's response
- Since HPAC's HMIS requires a response to all data fields before saving a record, the agency should use the "Data not collected" response to indicate missing data

#### **Monitoring**

The purpose of monitoring is to ensure that agencies are meeting or are as close as possible to meeting the agreed-upon data quality goals and benchmarks. Monitoring will also help agencies quickly identify and ideally resolve data quality issues.

The following subsections review the roles and responsibilities of each entity in the monitoring process and establish a monitoring schedule.

# **Monitoring Roles and Responsibilities**

#### **HMIS System Administrator**

The HMIS System Administrator is responsible for the ongoing maintenance of the existing data quality report, which includes working with the HMIS software vendor to update the report to reflect HUD's latest HMIS Data Standards. The HMIS System Administrator is also responsible for providing initial training to new users, teaching best practices for HMIS data entry.

# **HMIS Daily Operator**

The HMIS Daily Operator is responsible for providing technical assistance to Partner Agencies that need help addressing data quality issues. The HMIS Daily Operator is also responsible for providing ongoing training beyond the initial training provided by the HMIS System Administrator.

#### **HPAC Data Subcommittee**

The HPAC Data Subcommittee is responsible for reviewing each project's data quality on a quarterly basis. The Data Subcommittee will work to identify issues that do not comply with the agreed-upon goals and benchmarks. Based from the Data Subcommittee's assessment, the HMIS Daily Operator will offer individualized support and develop specialized trainings as necessary.

#### **HMIS Partner Agency**

The HMIS Partner Agency is responsible for pulling data quality reports and correcting data entry errors for each project within HMIS.

# **Monitoring Schedule**

As stated above, the HPAC Data Subcommittee will monitor the data quality of all active projects within HMIS on a quarterly basis. The Data Subcommittee meets on a quarterly basis, on the third Wednesday of January, April, July and October from 8:30 to 9:30 a.m. among rotating locations among Davis, West Sacramento, and Woodland. The County of Yolo's Homeless Analyst, who staffs the Data Subcommittee, will prepare data quality reports prior to the quarterly meetings.

# **Section 4: HMIS Privacy and Security Plan**

This section describes HPAC's HMIS Privacy and Security Plan. Developed by the HPAC Data Subcommittee in coordination with the HMIS System Administrator, HMIS Lead Agency, and HMIS Daily Operator, the Plan represents a system-level document that enhances HPAC's ability to protect the privacy and security of the information collected and stored in HMIS. As such, the Plan:

- Addresses federal regulations related to HMIS privacy and security
- Delineates specific roles and responsibilities for the HMIS System Administrator, the HMIS Daily
   Operator, the HMIS Partner Agency, and the HMIS End User
- Establishes system security safeguards
- Describes the procedures for implementing the plan and monitoring for compliance

As stated at the beginning of this manual, HPAC will review, revise, and re-ratify the HMIS Privacy and Security Plan every October upon a majority vote of all voting members present during the scheduled meeting. Prior to HPAC's vote, the Data Subcommittee will recommend updates to the full HPAC body according to HUD's latest HMIS standards.

It is important to note that the Plan complies with HUD's 2004 HMIS Data and Technical Standards Final Notice<sup>3</sup> as well as state and local laws regulating the confidentiality of personal information. Yet, at the time of writing this Plan, HUD has not yet released a final notice regarding HMIS security. Given this, the Plan contains preliminary security safeguards; however, HPAC anticipates updating the safeguards upon receiving final guidance from HUD.

It is also important to note that HPAC wrote the Plan in support of an open HMIS system, where data sharing occurs amongst agencies who opted to be part of the HPAC Data Sharing Agreement. While HPAC recognizes that individual agencies serve clients, HPAC equally recognizes that the region's entire homeless services system serves clients.

#### **HMIS Data and Technical Standards**

The core tenets of HPAC's Privacy and Security Plan are the requirements specified in the 2004 HMIS Data and Technical Standards Final Notice<sup>4</sup>. The following subsections explain each requirement and HPAC's standards for compliance.

#### **Privacy Statement**

The Privacy Statement describes how an agency collects, uses, and discloses client information. The Privacy Statement must also describe how a client can access his or her information. HPAC requires that each agency either adopt HPAC's standard Privacy Statement or adopt their own agency-specific Privacy Statement, which meets all of the minimum requirements set forth in HUD's 2004 HMIS Data and Technical Standards Final Notice<sup>5</sup> (see Additional Information about the Privacy Statement).

https://www.hudexchange.info/resources/documents/2004HUDDataandTechnicalStandards.pdf

https://www.hudexchange.info/resources/documents/2004HUDDataandTechnicalStandards.pdf

https://www.hudexchange.info/resources/documents/2004HUDDataandTechnicalStandards.pdf

<sup>&</sup>lt;sup>3</sup> 2004 HMIS Data and Technical Standards Final Notice:

<sup>&</sup>lt;sup>4</sup> 2004 HMIS Data and Technical Standards Final Notice:

<sup>&</sup>lt;sup>5</sup> 2004 HMIS Data and Technical Standards Final Notice:

In addition to having a Privacy Statement, HPAC requires that HMIS Partner Agencies, who have a website, post a link to the Privacy Statement online. HPAC also requires that Partner Agencies post the Privacy Statement at each intake desk(s) or a comparable location(s). Lastly, HPAC requires that all staff have access to hard copies of the Privacy Statement when out in the field.

# **Additional Information about the Privacy Statement**

As stated above, every HMIS Partner Agency must have a Privacy Statement that describes how and when the agency will use and disclose a client's Protected Personal Information (PPI). PPI includes name, Social Security Number (SSN), date of birth, zip code, project entry and/or exit date.

Partner Agencies may be required to collect a client's PPI by law or by funders. Partner Agencies also collect PPI to monitor project operations, to better understand the needs of persons experiencing homelessness, and to improve services for persons experiencing homelessness. HPAC only permits agencies to collect PPI with a client's written consent.

Partner Agencies may use and disclose PPI to:

- Verify eligibility for services
- Provide clients with and/or refer clients to services that meet their needs
- Manage and evaluate the performance of programs
- Report about program operations and outcomes to funders and/or apply for additional funding to support agency programs
- Collaborate with other local agencies to improve service coordination, reduce gaps in services, and develop community-wide strategic plans to address basic human needs
- Participate in research projects to better understand the needs of people served

Partner Agencies may also be required to disclose PPI for the following reasons:

- When the law requires it
- When necessary to prevent or respond to a serious and imminent threat to health or safety
- When a judge, law enforcement or administrative agency orders it

Partner Agencies are obligated to limit disclosures of PPI to the minimum necessary to accomplish the purpose of the disclosure. Uses and disclosures of PPI not described above may only be made with a client's written consent. Clients have the right to revoke consent at any time by submitting a request in writing.

Clients also have the right to request in writing:

- A copy of all PPI collected
- An amendment to any PPI used to make decisions about the client's care and services (this request may be denied at the discretion of the agency, but the client's request should be noted in the project records)
- An account of all disclosures of client PPI
- Restrictions on the type of information disclosed to outside partners
- A current copy of the agency's Privacy Statement

Partner Agencies may reserve the right to refuse a client's request for inspection or copying of PPI in the following circumstances:

- Information compiled in reasonable anticipation of litigation or comparable proceedings
- The record includes information about another individual (other than a health care or homeless provider)

- The information was obtained under a promise of confidentiality (other than a promise from a health care or homeless provider) and a disclosure would reveal the source of the information
- The Partner Agency believes that disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual

If an agency denies a client's request, the client should receive a written explanation for the denial. The client has the right to appeal the denial by following the established HPAC Partner Agency Agreement grievance procedure. Regardless of the outcome of the appeal, the client will have the right to add to his or her project records a concise statement of disagreement. The agency must disclose the statement of disagreement whenever it discloses the disputed PPI.

All individuals with access to PPI are required to complete formal training in privacy requirements at least annually.

Partner Agencies can amend their Privacy Statements at any time. Amendments may affect information obtained by the agency before the date of the change. An amendment to the Privacy Statement regarding use or disclosure will be effective with respect to information processed before the amendment, unless otherwise stated. The agency must make available a record of all amendments to the Privacy Statement upon a client's request.

As stated previously, a Privacy Statement must reflect, at a minimum, the baseline requirements outlined within HUD's 2004 HMIS Data and Technical Standards Final Notice. In any instance where an agency's Privacy Statement is not consistent with HUD standards, HUD standards will take precedence.

#### **Consumer Notice**

The Consumer Notice explains the reason for asking for personal information and notifies the client of the Privacy Statement. HPAC requires that agencies either adopt HPAC's standard Consumer Notice or adopt their own Consumer Notice, which meets all of the minimum requirements set forth in HUD's 2004 HMIS Data and Technical Standards Final Notice<sup>6</sup>.

In addition to having a Consumer Notice, HPAC requires that participating HMIS agencies post the Consumer Notice at each intake desk(s) or a comparable location(s). Lastly, HPAC requires that all staff have access to hard copies of the Consumer Notice when out in the field.

#### **List of Participating Agencies**

The List of Participating Agencies names all current HMIS using providers, which allows clients to see which organizations have access to their information. The HMIS Daily Operator will provide updated lists when necessary.

HPAC requires that participating HMIS agencies post the List of Participating Agencies at each intake desk(s) or a comparable location(s). Lastly, HPAC requires that all staff have access to hard copies of the List of Participating Agencies when out in the field.

#### Informed Consent and Release of Information Authorization

The Informed Consent and Release of Information Authorization must be signed by all adult clients and unaccompanied youth. This gives the client the opportunity to refuse the sharing of his or her information to

https://www.hudexchange.info/resources/documents/2004HUDDataandTechnicalStandards.pdf

<sup>&</sup>lt;sup>6</sup> 2004 HMIS Data and Technical Standards Final Notice:

other agencies within the system. HPAC requires client signatures prior to inputting their information in HMIS. HPAC also requires agencies to update Informed Consent and Release of Information Authorization forms every five years.

# **Privacy and Security Safeguards**

This section describes the various safeguards in place to protect the privacy and security of the information collected and stored in HMIS. It is important to note that all agency executive directors or program managers are responsible for understanding these safeguards and effectively communicating these safeguards to individuals responsible for privacy and security at their agency.

It is also important to underscore that all HMIS Partner Agencies must apply the safeguards explained below. Additionally, HPAC expects that agencies apply the safeguards to all networked devices. This includes, but is not limited to, networks, desktops, laptops, mobile devices, tablets, mainframes, and servers.

# **Physical Safeguards**

In order to protect client privacy, agencies must implement the following physical safeguards. For the purposes of this section, HPAC defines authorized users as HMIS End Users who have received the New End User Training and have signed New End User Agreements on file with the HMIS System Administrator.

# **Computer Location**

A computer used as an HMIS workstation must be in a secure location where only authorized staff members have access. The workstation must not be accessible to clients, the public, or volunteers. HPAC also requires that any computer accessing HMIS enable a password protected automatic screensaver.

# **Printer Location**

HPAC requires that users send HMIS documents to a printer located in a secure location where only authorized staff members have access.

#### **Monitor**

Non-authorized users should not be able to see an HMIS workstation screen. HPAC advises users to turn monitors away from the public view and utilize visibility filters to protect client privacy.

#### **Mobile Device**

A mobile device and/or tablet used to access and enter information into HMIS must use a password or other user authentication on the lock screen to prevent an unauthorized person from accessing it. In addition, the device and/or tablet should be set to automatically lock after a set period of inactivity. HPAC also recommends that users download a remote wipe and/or remote disable option onto the device.

#### **Technical Safeguards**

#### **Workstation Security**

To promote the security of HMIS and the confidentiality of the data contained therein, HPAC will only allow access to HMIS through approved workstations. To ensure compliance, the HMIS System Administrator will enlist the use of an IP Address Whitelist or another suitably secure method to identify approved workstations, in compliance with Public Access baseline requirement in the HUD Data Standards (4.3.1 System Security). Users will be required to submit the IP Address of their workstation to the HMIS System Administrator to be registered into the system and will notify the System Administrator should this number need to be changed.

#### **Establishing HMIS User IDs and Access Levels**

HPAC prohibits the sharing of usernames and passwords by or among more than one end user. To that end, the HMIS System Administrator will assign the most restrictive access level, while still allowing the end user to efficiently and effectively perform his or her duties.

#### **User Authentication**

- Usernames are individual and passwords are confidential. No individual should ever use or allow use of a
  username that is not assigned to that individual and passwords should never be shared or
  communicated in any format
- The system requires users to change temporary passwords upon first use. Passwords must be a minimum of six (6) characters long and must contain a combination of upper case and lower case letters, a number, and a symbol
- End users will be prompted by the software to change their password every ninety (90) days
- End Users must immediately notify the HMIS System Administrator if they have reason to believe that someone else has gained access to their password
- Three consecutive unsuccessful attempts to login will disable the username until the HMIS Daily Operator resets the password
- End users must log out from the HMIS application and either lock or log off their respective workstation
  if they leave. If the user logged into HMIS and the period of inactivity in HMIS exceeds 45minutes, the
  user will be logged off the HMIS system automatically

# **Rescinding User Access**

- The Partner Agency will notify the HMIS System Administrator at least 24-hours if an end user no longer requires access to perform his or her assigned duties due to a change of job duties or termination of employment.
- The HMIS System Administrator reserves the right to terminate end user licenses that are inactive for 60 days or more
- The HMIS System Administrator will attempt to contact the Partner Agency for the end user in question prior to termination of the user's license
- In the event of suspected or demonstrated noncompliance by an end user with the HMIS End User
  Agreement or any other HMIS plans, forms, standards or governance documents, the Partner Agency
  Security Officer must notify the HMIS System Administrator to deactivate the user's license while the
  Partner Agency Security Office conducts an internal agency investigation
- Any user found to have misappropriated client data (identity theft, releasing personal client data to any unauthorized party) will have his or her HMIS privileges revoked
- HPAC is empowered to permanently revoke a Partner Agency's access to HMIS for substantiated noncompliance with the provisions of this Plan that resulted in a release of PPI

#### Disposing Electronic, Hardcopies, Etc.

- Computer: All technology equipment (including computers, printers, copiers and fax machines) used to
  access HMIS and which will no longer be used to access HMIS will have their hard drives reformatted
  multiple times. If the device is now non-functional, it must have the hard drive pulled, destroyed and
  disposed of in a secure fashion
- Hardcopies: For paper records, shredding, burning, pulping, or pulverizing the records so that PPI is rendered essentially unreadable, indecipherable, and otherwise cannot be reconstructed
- Mobile Devices: Use software tools that will thoroughly delete/wipe all information on the device and return it to the original factory state before discarding or reusing the device

#### **Other Technical Safeguards**

- HPAC requires that each HMIS Partner Agency develop and implement procedures for managing new, retired, and compromised local system account credentials
- HPAC requires that each HMIS Partner Agency develop and implement procedures that will prevent unauthorized users from connecting to private agency networks
- Unencrypted PPI may not be stored or transmitted in any fashion—including sending file attachments by
  email or downloading reports including PPI to a flash drive, to the End User's desktop or to an agency
  shared drive. All downloaded files containing PPI must be deleted from the workstation temporary files
  and the "Recycling Bin" emptied before the End User leaves the workstation

# **Disaster Recovery Policy**

The HMIS System Administrator is responsible for facilitating recovery from a disaster with support from the HMIS software vendor as needed. As such, the System Administrator must:

- Be aware of and be trained to complete any tasks or procedures for which they are responsible in the event of a disaster
- Have a plan for restoring local computing capabilities and internet connectivity for the HMIS System Administrator's facilities
- Maintain a readily accessible list of account numbers and contact information for its internet service provider, support contracts, and equipment warranties
- Maintain a list of the computer and network equipment required to restore minimal access to HMIS and to continue providing services to HMIS Partner Agencies
- Maintain documentation of the configuration settings required to restore local user accounts and internet access

#### **Workforce Security Policy**

#### **HMIS Access to Active Clients**

HPAC has an open HMIS system and most HMIS Users have access to client's current or past history from other agencies. With the goal of protecting the security and integrity of the HMIS system and safeguarding the personal information contained therein, HPAC will no longer give HMIS access to individuals who are actively receiving services from any HMIS partner agency with an active record in either the HPAC or Sacramento CoC HMIS.

- The HMIS System Administrator will search the individual in HMIS before issuing HMIS access
- The HMIS System Administrator will deny access to individuals who are active in HMIS

#### **Background Check Policy**

#### **HMIS End User Background Check Requirements**

HPAC recognizes the sensitivity of the data in HMIS, and therefore requires that the individuals responsible for managing HMIS be subject to a criminal background check.

The HMIS System Administrator will deny access to HMIS if a staff member's background check reveals a history of any of the following crimes:

- Bank Fraud: To engage in an act or pattern of activity where the purpose is to defraud a bank of funds
- Blackmail: A demand for money or other consideration under threat to do bodily harm, to injure property, to accuse of a crime, or to expose secrets

- Bribery: When an individual offers money, goods, services, information or anything else of value with intent to influence the actions, opinions, or decisions of the taker. You may be charged with bribery whether you offer the bribe or accept it
- Computer fraud: Where computer hackers steal information sources contained on computers such as: bank information, credit cards, and proprietary information
- Credit Card Fraud: The unauthorized use of a credit card to obtain goods of value
- Extortion: Occurs when one person illegally obtains property from another by actual or threatened force, fear, or violence, or under cover of official right
- Forgery: When a person passes a false or worthless instrument such as a check or counterfeit security with the intent to defraud or injure the recipient
- Health Care Fraud: Where an unlicensed health care provider provides services under the guise of being licensed and obtains monetary benefit for the service
- Larceny/Theft: When a person wrongfully takes another person's money or property with the intent to appropriate, convert or steal it
- Money Laundering: The investment or transfer of money from racketeering, drug transactions or other embezzlement schemes so that it appears that its original source either cannot be traced or is legitimate
- Telemarketing Fraud: Actors operate out of boiler rooms and place telephone calls to residences and
  corporations where the actor requests a donation to an alleged charitable organization or where the
  actor requests money up front or a credit card number up front, and does not use the donation for the
  stated purpose
- Welfare Fraud: To engage in an act or acts where the purpose is to obtain benefits (i.e. Public Assistance, Food Stamps, or Medicaid) from the State or Federal Government

In order to comply with this safeguard, HMIS Partner Agencies must have a policy regarding conducting background checks and hiring individuals with criminal justice histories. The policy should require that all end users have a background check prior to requesting HMIS access.

#### **Monitoring**

HPAC will monitor adherence to the Plan using the following structure and measures.

#### **Roles and Responsibilities**

#### **HMIS System Administrator**

As the HMIS System Administrator, SSF:

- Prevents degradation of the system resulting from viruses, intrusion, or other factors within the System Administrator's control
- Prevents inadvertent release of confidential client-specific information through physical or electronics access to system servers

# **HMIS Daily Operator**

As the HMIS Daily Operator, the County of Yolo:

 Provides technical assistance to agencies and users who need assistance complying with HPAC's Privacy and Security Plan

#### **HPAC Data Subcommittee**

As an advisory group to the full HPAC body, the Data Subcommittee:

• Makes annual recommendations to the full HPAC body regarding revisions to the Plan

- Monitors agencies and users to ensure adherence to the roles and responsibilities delineated within HPAC's Privacy and Security Plan
- Develops technical assistance, action and/or compliance plans for agencies that the Data Subcommittee finds to be in violation of HPAC's Privacy and Security Plan

# **HMIS Partner Agency**

The HMIS Partner Agency:

- Prevents degradation of the HMIS resulting from viruses, intrusion, or other factors within the agency's control and prevents the inadvertent release of confidential client-specific information through physical, electronic or visual access to user workstations
- Ensures the agency meets the privacy and security requirements detailed in the HUD HMIS Data and Technical Standards
- Adopts and upholds a Privacy Statement, which meets or exceeds all minimum standards including substance use providers covered by 24 CFR Part 2, HIPPA covered agencies
  - Modifications to HPAC's standard Privacy Statement must be approved by the HPAC Data Subcommittee
- Ensures that all clients are aware of the adopted Privacy Statement and have access to it
  - o If the agency has a website, the agency must publish the Privacy Statement on their website
- Makes reasonable accommodations for persons with disabilities, language barriers, or education barriers
- Ensures that anyone working with clients covered by the Privacy Statement can meet the user responsibilities
- Designates at least one Security Officer that has been trained to technologically uphold the adopted Privacy Statement

#### **HMIS End User**

HPAC defines an HMIS end user as a person that has direct interaction with a client and/or his or her data including but not limited to PPI. Therefore, an end user:

- Reads and understands his or her agency's Privacy Statement
- Has the ability to explain his or her agency's Privacy Statement to clients
- Adheres to his or her agency's Privacy Statement
- Knows where to refer a client if he or she cannot answer a question
- Completes an Informed Consent and Release of Information Authorization with a client prior to collecting and inputting HMIS data
- Presents his or her agency's Privacy Statement to a client before collecting any information
- Upholds a client's privacy in HMIS

#### **Security Officers**

To further assist with the monitoring, all HMIS Partner Agencies must designate a Partner Agency Security Officer to ensure adherence to HPAC's Privacy and Security Plan.

#### **Lead Security Officer**

- May be the HMIS System Administrator or another employee, volunteer or contractor designated by SSF who has completed HMIS Privacy and Security training and is adequately skilled to assess HMIS security compliance
- Assesses security measures in place prior to establishing access to HMIS for a new Agency

- Reviews and maintains file of Partner Agency annual compliance certification checklists
- Conducts annual security audit of all Partner Agencies

# **Partner Agency Security Officer**

- May be the Partner Agency HMIS Agency Administrator or another Partner Agency employee, volunteer
  or contractor who has completed HMIS Privacy and Security training and is adequately skilled to assess
  HMIS security compliance,
- Conducts a security audit for any workstation that will be used for HMIS purposes
  - No less than semiannually for all agency HMIS workstations
  - o Prior to issuing a User ID to a new HMIS End User
  - Any time an existing user moves to a new workstation
- Continually ensures each workstation within the Partner Agency used for HMIS data collection or entry
  is adequately protected by a firewall and antivirus software (per Technical Safeguards—Workstation
  Security)
- Completes the semiannual Compliance Certification Checklist, and forwards the Checklist to the Lead Security Officer

Upon request, the HMIS Lead Agency may be available to provide Security support to Partner Agencies who do not have the staff capacity or resources to fulfill the duties assigned to the Partner Agency Security Officer.

- Partner Agency Security Officer will confirm that any workstation accessing HMIS shall have antivirus software with current virus definitions (updated at minimum every 24 hours) and frequent full system scans (at minimum weekly)
- Partner Agency Security Officer will confirm that any workstation accessing HMIS has and uses a
  hardware or software firewall; either on the workstation itself if it accesses the internet through a
  modem or on the central server if the workstation(s) accesses the internet through the server

# **New HMIS Partner Agency Site Security Assessment**

Prior to establishing access to HMIS for a new Partner Agency, the Lead Security Officer will assess the security measures in place at the Partner Agency to protect client data (see Technical Safeguards—Workstation Security). The Lead Security Officer or other HMIS System Administrator will meet with the Partner Agency Executive Director (or executive-level designee) and Partner Agency Security Officer to review the Partner Agency's information security protocols prior to countersigning the HMIS Memorandum of Understanding. This security review shall in no way reduce the Partner Agency's responsibility for information security, which is the full and complete responsibility of the Partner Agency, its Executive Director, and its HMIS Agency Security Officer.

#### **Semiannual Partner Agency Self-Audits**

- The Partner Agency Security Officer will use the Compliance Certification Checklist to conduct semiannually security audits of all Partner Agency HMIS End User workstations.
- The Partner Agency Security Officer will audit for inappropriate remote access by End-Users by associating User login date/times with employee time sheets. End Users must certify that they will not remotely access HMIS from a workstation (i.e. personal computer) that is not subject to the Partner Agency Security Officer's regular audits.
- If areas are identified that require action due to noncompliance with these standards or any element of the HPAC HMIS Policies and Procedures, the Partner Agency Security Officer will note these on the Checklist, and the Partner Agency Security Officer and/or HMIS Agency Administrator will work to resolve the action item(s) within fifteen (15) days

- Any Checklist that includes one or more findings of noncompliance and/or action items will not be
  considered complete until all action items have been resolved. The findings, action items, and resolution
  summary must be reviewed and signed by the Agency's Executive Director or other empowered officer
  prior to being forwarded to the Lead Security Officer
- The Partner Agency Security Officer must turn in a copy of the Checklist to the Lead Security Officer on a semiannual basis

# **Annual Security Audits**

- The Lead Security Officer will schedule the annual security audit in advance with the Partner Agency Security Officer
- The Lead Security Officer will use the Compliance Certification Checklist to conduct security audits
- The Lead Security Officer must randomly audit at least 10% of the workstations used for HMIS data entry for each HMIS Partner Agency. In the event that an agency has more than one project site, at least one workstation per project site must be audited
- If areas are identified that require action due to noncompliance with these standards or any element of the HPAC HMIS Policies and Procedures, the Lead Security Officer will note these on the Checklist, and the Partner Agency Security Officer and/or HMIS Agency Administrator will work to resolve the action item(s) within fifteen (15) days
- Any Checklist that includes one or more findings of noncompliance and/or action items will not be
  considered complete until all action items have been resolved and the findings, action items, and
  resolution summary has been reviewed and signed by the Agency's Executive Director or other
  empowered officer and forwarded to the HMIS Lead Security Officer

# **Reporting Security Incidents**

While HPAC intends for the monitoring to prevent, to the greatest degree possible, any security incidents, should a security incident occur, an agency should comply with the following reporting procedures:

- Any user who becomes aware of or suspects a compromise in HMIS security and/or client privacy must immediately report the concern to their agency's Security Officer.
- In the event of a suspected security or privacy concern, the agency Security Officer should complete an internal investigation
- If the suspected security or privacy concern resulted from a user's suspected or demonstrated noncompliance with the HMIS End User Agreement, the Security Officer should have the HMIS System Administrator deactivate the user's account until the internal investigation has been completed
- Following the internal investigation, the Security Officer should notify the Lead Security Officer of any substantiated incidents that may have compromised HMIS system security and/or client privacy whether or not a release of client PPI is definitively known to have occurred
- If the security or privacy concern resulted from demonstrated noncompliance by a user with a signed HMIS End User Agreement, the Lead Security Officer reserves the right to permanently deactivate the user account for the user in question
- Within one business day after the Lead Security Officer receives notice of the security or privacy concern, the Lead Security Officer and Partner Agency Security Officer will jointly establish an action plan to analyze the source of the security or privacy concern and actively prevent such future concerns
- The user or agency must implement the action plan as soon as possible, and the total term of the plan must not exceed thirty (30) days

- If the user or agency is not able to meet the terms of the action plan within the time allotted, the HMIS
  System Administrator, in consultation with the full HPAC body, may elect to terminate the agency's
  access to HMIS
- The agency may appeal to HPAC for reinstatement to HMIS following completion of the requirements of the action plan
- In the event of a substantiated release of PPI in noncompliance with the provisions of the HPAC's Privacy and Security Plan, this manual, or the Privacy Statement, the Security Officer will make a reasonable attempt to notify all impacted individual(s)
- The Lead Security Officer must approve of the method of notification and the agency Security Officer must provide the Lead Security Officer with evidence of the agency's notification attempt(s)
- If the Lead Security Officer is not satisfied with the agency's efforts to notify impacted individuals, the Lead Security Officer will attempt to notify impacted individuals at the agency's expense
- The HMIS System Administrator will notify HPAC of any substantiated release of PPI in noncompliance with the provisions of HPAC's Privacy and Security Plan, this manual, or the Privacy Statement
- The HMIS System Administrator will maintain a record of all substantiated releases of PPI in noncompliance with the provisions of HPAC's Privacy and Security Plan, this manual, or the Privacy Statement for 7 years
- HPAC reserves the right to permanently revoke an agency's access to HMIS for substantiated noncompliance with the provisions of HPAC's Privacy and Security Plan, this manual, or the Privacy Statement that resulted in a release of PPI



# **Yolo County Homeless and Poverty Action Coalition (HPAC)**

Policies and Procedures Manual

Davis/Woodland/Yolo County Continuum of Care (CA-521) *Adopted August 24, 2016* 

# **Table of Contents**

Table of Contents	1
Overview	2
About HPAC	2
Coordinated Entry	3
Points of Entry	3
Assessment, Referral and Placement Process	3
Process for Victims of Domestic Violence, Dating Violence, Human Trafficking, Sexual Assault, and	d Staking4
Service Standards	5
Definitions of Homelessness	5
Recordkeeping and Reporting Requirements	7
Prevention	8
Street Outreach (SO)	
Emergency Shelter (ES)	10
Rapid Re-Housing (RRH)	
Transitional Housing (TH)	13
Permanent Supportive Housing (PSH)	15
Minimum Services Standards for all Project Types	17

# **Overview**

Pursuant to 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule<sup>1</sup>, this document shall serve as the policies and procedures manual for the Davis/Woodland/Yolo County Continuum of Care (CA-521), hereafter known as the Homeless and Poverty Action Coalition (HPAC). As a counterpart to HPAC's Governance Charter, this manual shall be reviewed, revised, and re-ratified with the Governance Charter every October upon a majority vote of all voting members present during the scheduled meeting.

This manual shall contain most relevant information required by 24 CFR Part 578 Subpart B that is not included in HPAC's Governance Charter. The only exception is information pertinent to the region's local Homeless Management Information System (HMIS). HPAC's HMIS Policies and Procedures Manual shall contain this information, which includes a privacy, security, and data quality plan.

#### **About HPAC**

HPAC is a local planning body that provides leadership and coordination on the issues of homelessness and poverty in Yolo County. HPAC serves numerous roles and responsibilities, many of which fulfill federal, state and local government mandates. Such activities include, but are not limited to:

- Implementing the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act
- Implementing the region's Homeless Management Information System (HMIS)
- Maintaining a coordinated response among service providers to ensure continuity of services
- Assessing needs and identifying gaps in services for persons facing homelessness in Yolo County on an ongoing basis
- Supporting the planning, funding, and development of services to meet prioritized needs within Yolo County
- Planning, developing, and sustaining options to meet the housing needs of people facing homelessness
- Promoting access to and effective utilization of mainstream human services programs

<sup>&</sup>lt;sup>1</sup> 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578\_165

# **Coordinated Entry**

HPAC is currently in the process of conducting a comprehensive community engagement process to design its permanent coordinated entry system. In the meantime, HPAC has implemented an interim coordinated entry system that is intended to quickly connect households with the most appropriate type of housing and services. The interim system will serve as a pilot, with successful components of the interim solution being integrated into the permanent coordinated entry system.

# **Points of Entry**

HPAC has selected a "no wrong door" approach to its interim coordinated entry system. All local providers of homeless services are eligible to participate as a point of entry to the system, as long as they meet the following minimum requirements:

- Have access to HMIS or a comparable database as permitted by the United States Department of Housing and Urban and Development (HUD) for domestic violence, dating violence, human trafficking, sexual assault, and stalking victim service providers
- Opt-in to the HPAC Data Sharing Agreement
- Receive training on use of the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT)

# **Assessment, Referral and Placement Process**

Each point of entry to the interim system uses the following three steps to assist homeless individuals and families in connecting with appropriate services based on their unique needs and vulnerability.

- 1. **Assessment**: Each homeless individual and family is assessed using the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT). The VI-SPDAT is used to (1) determine the chronicity and vulnerability of homeless individuals (including critical health and safety needs), and (2) identify which type of permanent housing solution (permanent supportive housing, rapid re-housing or affordable housing) is most appropriate. Each individual receives a score based on the assessment, with a higher VI-SPDAT score indicating that the individual or family is more vulnerable. For individuals who receive a lower VI-SPDAT score and indicate that they have other safe and appropriate housing options or resources, HPAC shall link them to homeless prevention assistance as needed and available. This may also include linkage to other appropriate services from various providers based on individual need.
- 2. **Referral**: HPAC uses the results from the VI-SPDAT to refer the individual or family to the most appropriate type of housing and services. In the permanent coordinated entry system, it is HPAC's hope to establish a community queue, where HPAC maintains and prioritizes all referrals on one list.
- 3. Placement: Those individuals or families who have the highest VI-SPDAT scores (meaning they are the most vulnerable) are prioritized first for housing and services as slots become available. Individuals or families who cannot immediately be placed in permanent housing continue to receive services from outreach workers or other providers while they wait for a bed.

# Process for Victims of Domestic Violence, Dating Violence, Human Trafficking, Sexual Assault, and Staking

Pursuant to 24 CFR Subpart B Section 578.7<sup>2</sup>, HPAC shall implement a separate coordinated entry process for victims of domestic violence, dating violence, human trafficking, sexual assault, staking, and any other dangerous or life-threatening conditions that relate to violence against a homeless individual or family.

To protect the safety and maintain the confidentiality of such survivors, HPAC prohibits victim service providers from using HMIS. Rather, HPAC requires that victim service providers use a comparable database as permitted by HUD.

To ensure that homeless survivors receive the same opportunities afforded by the region's coordinated entry system as all others, HPAC implements the following process:

- If an individual or family experiencing homelessness presents to a non-victim service provider and either self-identifies herself, himself or a family member as a victim or reveals any information that implies dangerous or life-threatening conditions that relate to violence, the provider must refer the individual or family to a victim service provider.
- 2. Upon connecting, the victim service provider shall perform an intake assessment of the individual or family to determine if the survivor is eligible for shelter entry based on lethality as well as bed availability.
- 3. If the victim service provider deems that the individual or family does not have adequate resources to exit homelessness on her, his or their own, the provider shall conduct a VI-SPDAT.
- 4. Once complete, the provider shall send an anonymous VI-SPDAT to the County Homeless Program Coordinator. The only personal identifying information shall be the unique identification number indicating the appropriate record within the victim service provider's comparable database.
- 5. HPAC will then integrate the anonymous victim service referrals into its community queue. In addition, HPAC shall require training specifically related to this process. In particular, HPAC shall train coordinated entry staff on the confidentiality and privacy rights of survivors protected by the Health Insurance Portability and Accountability Act (HIPAA) as well as the Violence Against Women Act (VAWA).

<sup>&</sup>lt;sup>2</sup> 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578 165

# **Service Standards**

This section of the manual shall define HPAC's expected service standards for local projects receiving funding from HUD, including projects funded by the Continuum of Care (CoC) and/or Emergency Solutions Grant (ESG) programs. This section shall define the different categories of homelessness as well as define the recordkeeping and reporting requirements and shall provide written standards for applicable projects providing services in any of the following areas:

- Prevention
- Street Outreach
- Emergency Shelter
- Rapid Re-Housing
- Transitional Housing
- Permanent Supportive Housing

#### **Definitions of Homelessness**

HPAC shall expect all CoC and/or ESG funded programs to use the following definitions of homelessness, as determined by 24 CFR Parts 91, 578, 582, and 583<sup>3 and 4</sup>. The definitions are also pursuant to federal ESG regulations 24 CFR Subpart A Section 576.2<sup>5</sup>.

	An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
	<ul> <li>Unsheltered Homelessness: The individual or family has a primary nighttime residence that is a public or private place not meant for human habitation;</li> </ul>
Literally Homeless	<ul> <li>Sheltered Homelessness: The individual or family is living in a publicly or privately operated shelter designated to provide temporary living arrangements—including congregate shelters and hotels and motels paid for by charitable organizations or by federal, state, and local government programs; or</li> <li>Institutional Homelessness: The individual is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution</li> </ul>

<sup>&</sup>lt;sup>3</sup> 24 CFR Parts 91, 582, and 583 Final Rule on Homeless Definitions:

https://www.hudexchange.info/resources/documents/HEARTH\_HomelessDefinition\_FinalRule.pdf

<sup>&</sup>lt;sup>4</sup> 24 CFR Parts 91 and 578 Final Rule on Chronically Homeless Definition:

https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf

<sup>&</sup>lt;sup>5</sup> 24 CFR Parts 91 and 576 Homeless Emergency Assistance and Rapid Transition to Housing: Emergency Solutions Grants Program and Consolidation Plan Conforming Amendments:

https://www.hudexchange.info/resources/documents/HEARTH ESGInterimRule&ConPlanConformingAmendments.pdf

	An individual or family who will imminently lose their primary nighttime residence, provided that:
	<ul> <li>The individual or family has an annual income below 30 percent of the median family income for the geographic area; and</li> <li>The individual or family has insufficient resources or support networks immediately available to attain housing stability</li> </ul>
	In addition, the individual or family must also meet one of the following risk factors:
	<ul> <li>Has moved two or more times during the 60 days immediately preceding the application for homelessness prevention assistance because of economic reasons;</li> </ul>
Imminent Risk of Homelessness	<ul> <li>Is living in the home of another because of economic hardship;</li> <li>Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;</li> </ul>
	<ul> <li>Lives in a hotel or motel not paid for by federal, state, or local government programs for low-income individuals or charitable organizations;</li> </ul>
	<ul> <li>Lives in a single-room occupancy or efficiency apartment unit in which more than two persons, on average, reside or another type of housing in which there reside more than 1.5 persons per room as defined by the U.S. Census Bureau;</li> </ul>
	Is exiting a publicly funded institution or system of care, such as a healthcare facility, mental health facility, foster care, or other you facility, or correction program or institution; or
	<ul> <li>Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness</li> </ul>
	Unaccompanied youth under 25 years of age or families with children and youth, who do not otherwise qualify as homeless under the definition stated above, but who:
Homeless under other Federal Statutes	<ul> <li>Are defined as homeless under the other listed federal statutes;</li> <li>Have not signed a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance</li> </ul>
	<ul> <li>application;</li> <li>Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and</li> </ul>
	Can be expected to continue in such status for an extended period of time due to special needs or barriers
Fleeing/Attempting to	An individual or family who:
Flee Domestic Violence	<ul> <li>Is fleeing or is attempting to flee domestic violence;</li> <li>Has no other residence; and</li> </ul>

	<del>-</del>
	Lacks the resources or support networks to obtain other permanent housing
Chronically Homeless	<ul> <li>Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and</li> <li>Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least one year or on at least four separate occasions in the last three years, where the cumulative total of the four occasions is at least one year. Stays in institutions of 90 days or less will not constitute as a break in homelessness, but rather such stays are included in the cumulative total; and</li> <li>Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; or</li> <li>An individual who has been residing in an institutional care facility, including a jail, substance use or mental health treatment facility, hospital, or other similar facility for fewer than 90 days and met all of the criteria listed in paragraph 1 before entering the facility; or</li> <li>A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria listed in paragraph 1 including a family whose composition has fluctuated while the head of household has been homeless</li> </ul>

# **Recordkeeping and Reporting Requirements**

Pursuant to 24 CFR Parts 91 and 576 Section 576.500 (b-e) <sup>6</sup>, HPAC shall expect that all CoC and/or ESG funded projects comply with federal recordkeeping and reporting requirements.

HPAC shall require that agencies upload the documentation specified in 24 CFR Parts 91 and 576, Section 576.500 (b-e)<sup>7</sup> into the region's HMIS. Described in more detail within HPAC's HMIS Policies and Procedures Manual, the HMIS Daily Operator shall monitor and ensure compliance with such requirements on a quarterly basis.

<sup>&</sup>lt;sup>6</sup> 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578\_165

<sup>&</sup>lt;sup>7</sup> 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578 165

#### Prevention

HPAC defines prevention as services that are necessary to prevent an individual or family from becoming homeless. These services include various housing relocation and stabilization services as well as short to medium term rental assistance.

At present, HPAC does not permit prevention using ESG funds as a stand-alone activity. Rather, prevention must be provided in conjunction with rapid re-housing and/or emergency shelter. For rapid re-housing, HPAC's intention is to facilitate preventing homelessness of a previously assisted individual or family who is experiencing instability after rapid re-housing assistance has ended. For emergency shelter, HPAC's intention is to facilitate shelter diversion.

#### Prevention Eligibility

In order to be eligible for prevention services, an individual or at least one family member must:

Meet the definition for imminent risk of homelessness

#### **Prevention Prioritization**

Of the eligible individuals and families, HPAC designates the following as priority populations pursuant to 25 California Code of Regulations 8409 Core Practices<sup>8</sup>:

 Individuals or families who are at the greatest risk of becoming literally homeless without an intervention and are at greatest risk of experiencing a longer time in shelter or on the street should they become homeless

#### **Prevention Minimum Service Standards**

HPAC designates the following as minimum service standards for programs offering prevention services:

- Must either assist the individual or family to regain stability in their current housing or move into other permanent housing and achieve stability in that housing
- For project participants who receive prevention assistance in conjunction with rapid re-housing, providers must conduct a 3-month evaluation
- Services may include, but are not limited to:
  - o Rental assistance (such as paying all or a portion of the client's rent)
  - Other financial assistance (such as rental application fees, security and utility deposits, utility payments, last month's rent, rent in arrears, and moving costs)
  - Housing placement and retention assistance (such as search and placement, case management, landlord mediation, tenant legal services, credit repair, financial coaching, bills, and arrears)
- Meet the minimum services standards for all project types, as described at the end of this chapter

<sup>&</sup>lt;sup>8</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1

# Street Outreach (SO)

HPAC defines street outreach (SO) as services that engage individuals or families experiencing unsheltered homelessness and assist in improving the health and well-being of the individual or family.

#### SO Eligibility

In order to be eligible for SO services, an individual or at least one family member must:

- Meet the definition for literally homeless
- Live in unsheltered homelessness at the time of first contact

#### SO Prioritization

Pursuant to 25 California Code of Regulations 8409 Core Practices<sup>9</sup>, SO projects shall use the VI-SPDAT as an assessment tool to prioritize the individuals and families with the most urgent and severe needs. This includes:

- Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings
- Have experienced the longest amount of time homeless
- Have multiple and severe service needs that inhibit their ability to quickly identify and secure housing on their own

This practice aligns with HPAC's envisioned permanent coordinated entry system and shall ensure access to assistance regardless of where an individual or family is located within HPAC's service region.

In general, HPAC expects that using the VI-SPDAT will concurrently prioritize the target subpopulations identified in the Yolo County 10-Year Plan to End Homelessness and the United States Interagency Council on Homelessness' (USICH) Opening Doors: A Federal Strategic Plan to Prevent and End Homelessness. These target subpopulations include:

- Individuals or families with a history of chronic homelessness
- Families with a history of homelessness
- Transition age youth with a history of homelessness (age 18 to 24)
- Unaccompanied youth with a history homelessness (meaning an individual under the age of 18 with no family member over the age of 18 in the household)
- Veterans with a history of homelessness (meaning an individual or family member who has served in active United States military duty)

# SO Minimum Service Standards

HPAC designates the following as minimum services standards for projects offering street outreach services:

- Participants and staff understand that the primary goals of street outreach are to:
  - Provide access to emergency shelter and services

<sup>&</sup>lt;sup>9</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1

- Re-house participants in permanent housing as quickly as possible, regardless of other personal issues or concerns
- Conduct outreach to engage unsheltered homeless individual or families
- Link unsheltered homeless individual or families to the region's coordinated entry system
- Accept triage referrals through HPAC's coordinated entry system
- Meet the minimum services standards for all project types, as described at the end of this chapter

# **Emergency Shelter (ES)**

HPAC defines emergency shelter (ES) as a living arrangement that provides temporary shelter and supportive services, without a standard lease agreement.

#### **ES Eligibility**

In order to be eligible for ES projects, individuals or at least one family member must meet the definition for one of the following categories:

- Literally homeless
- Fleeing/attempting to flee domestic violence, dating violence, human trafficking, sexual assault, staking, and any other dangerous or life-threatening conditions that relate to violence against a homeless individual or family

HPAC allows shelters to serve a specific sub-population (such as persons with mental illness or victims of domestic violence, dating violence, human trafficking, sexual assault and/or stalking) within the definitions above, depending on organizational missions and goals.

#### **ES Prioritization**

Of the eligible individuals and families, HPAC shall prioritize those with the most urgent and severe needs. Pursuant to 25 California Code of Regulations 8409 Core Practices<sup>10</sup>, this includes but is not limited to those who:

- Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings
- Have experienced the longest amount of time homeless
- Have multiple and severe service needs that inhibit their ability to quickly identify and secure housing on their own

HPAC expects that doing so will concurrently prioritize the target subpopulations identified in the Yolo County 10-Year Plan to End Homelessness and the United States Interagency Council on Homelessness' (USICH) Opening Doors: A Federal Strategic Plan to Prevent and End Homelessness. These target subpopulations include:

- Individuals or families with a history of chronic homelessness
- Families with a history of homelessness

<sup>10</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=document/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=document/calregs/Document/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=document/calregs/Document/calregs/

- Transition age youth with a history of homelessness (meaning an individual or family member age 18 to 24)
- Unaccompanied youth with a history homelessness (meaning an individual under the age of 18 with no family member over the age of 18 in the household)
- Veterans with a history of homelessness (meaning an individual or family member who has served in active United States military duty)

#### **ES Minimum Standards**

HPAC designates the following as minimum service standards for projects providing emergency shelter services:

- Participants and staff must understand that the primary goals of the emergency shelter are to:
  - o Provide temporary accommodation that is safe, respectful, and responsive to individual needs
  - Re-house participants in permanent housing as quickly as possible, regardless of other personal issues or concerns
- No minimum or maximum length of stay for project participants; however, providers may determine a
  target length of stay for participants (such as 90 days), at which point the participant's case may be reassessed to determine whether a longer stay is appropriate.
- No leases or occupancy agreements
- Meet the minimum services standards for all project types, as described at the end of this chapter

# Rapid Re-Housing (RRH)

HPAC defines rapid re-housing (RRH) as housing that provides short to medium term move-in and rental assistance, as well as assistance with housing identification and supportive services.

#### RRH Eligibility

In order to be eligible for RRH projects, individuals or at least one family member must meet the definition for one of the following categories:

- Literally homeless
- Imminent risk of homelessness (only if the individual or at least one family member qualifies for prevention per HPAC's standards)
- Fleeing/attempting to flee domestic violence, dating violence, human trafficking, sexual assault, staking, and any other dangerous or life-threatening conditions that relate to violence against a homeless individual or family

In addition, individuals or at least one member of the family must:

- Earn enough income to pay at least 30% of their monthly rent or at least 30% of their monthly income, whichever is lower
  - HPAC considers monthly income to consist of:
    - Earned income
    - Self-employment/business income
    - Interest and dividend income
    - Pension/retirement income

- Unemployment and disability income
- Temporary Assistance for Needy Families (TANF)/public assistance
- Alimony, child support, and foster care income
- Armed forces income
- While generally expecting households to pay at least 30% of their monthly rent or monthly income, HPAC permits RRH project managers to authorize lesser contributions under extraordinary circumstances
- At times, this may include paying the entire rent on behalf of households that have no current income
- Meet any funder-specific eligibility requirements

#### **RRH Prioritization**

Of the eligible individuals and families, HPAC shall prioritize those with the most urgent and severe needs. Pursuant to 25 California Code of Regulations 8409 Core Practices<sup>11</sup>, this includes but is not limited to those who:

- Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings
- Have experienced the longest amount of time homeless
- Have multiple and severe service needs that inhibit their ability to quickly identify and secure housing on their own

In general, HPAC expects that doing so will concurrently prioritize the target subpopulations identified in the Yolo County 10-Year Plan to End Homelessness and the United States Interagency Council on Homelessness' (USICH) Opening Doors: A Federal Strategic Plan to Prevent and End Homelessness. These target subpopulations include:

- Individuals or families with a history of chronic homelessness
- Families with a history of homelessness
- Transition age youth with a history of homelessness (age 18 to 24)
- Unaccompanied youth with a history homelessness (meaning an individual under the age of 18 with no family member over the age of 18 in the household)
- Veterans with a history of homelessness (meaning an individual or family member who has served in active United States military duty)

For projects using the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) as an assessment tool, HPAC designates the following as priority populations:

- Individuals who receive a VI-SPDAT-Single score of 4 to 7; or
- Families who receive a VI-SPDAT-Family score of 4 to 8

**RRH Minimum Service Standards** 

.

<sup>&</sup>lt;sup>11</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1

HPAC designates the following as minimum service standards:

- Participants and staff must understand that the primary goals of RRH are to:
  - End homelessness
  - Move participants to permanent housing as quickly as possible, regardless of personal issues
- No maximum monetary amount for rental assistance; however, individual assistance may not exceed 24 months during a 3-year period
- For project participants who receive rental assistance, providers must conduct an annual evaluation to determine continued eligibility
  - At the time of evaluation, if a participant's income has changed, the amount of rental assistance will be adjusted to meet the 30% threshold
- For participants who receive prevention assistance, providers must conduct a 3-month evaluation
- For project-based assistance, providers must ensure a one-year lease
- All individuals or families that are literally homeless who cannot quickly secure housing on their own or
  with another form of assistance are screened for and offered rapid re-housing assistance, to the extent
  they are eligible and assistance is available
- Housing identification efforts must consider, within the limits of the participant's income, where the
  individual or family wants to live and if the individual or family feels safe
- Project providers must use a fair, yet flexible approach when determining the duration of assistance
- Project providers must use a fair, yet flexible approach when determining what qualifies as an extraordinary circumstance (whereas project participants do not need to meet the 30% threshold)
- Supportive services must be provided throughout the entire time that rental assistance is provided
- Must ensure that data on all persons served and all activities provided are entered into HMIS (or a comparable database if the agency is a domestic violence, dating violence, human trafficking, sexual assault, and stalking victims service provider) pursuant to HUD and local standards.
- Meet the minimum services standards for all project types, as described at the end of this chapter

#### **Transitional Housing (TH)**

HPAC defines transitional housing (TH) as housing that provides temporary housing and supportive services, as an interim solution toward securing permanent housing. Unlike emergency shelter, transitional housing participants must enter into a lease agreement.

#### TH Eligibility

In order to be eligible for TH projects, individuals or at least one family member must meet the definition for one of the following categories:

- Literally homeless
- Imminent risk of homelessness
- Homeless under other Federal Statutes (if the project(s) received approval from HUD to serve this category)

• Fleeing/attempting to flee domestic violence

In addition, individuals or at least one member of the family must:

Meet any funder-specific eligibility requirements

#### **TH Prioritization**

Of the eligible households, HPAC shall prioritize those with the most urgent and severe needs. Pursuant to 25 California Code of Regulations 8409 Core Practices<sup>12</sup>, this includes but is not limited to those who:

- Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings
- Have experienced the longest amount of time homeless
- Have multiple service needs that inhibit their ability to identify and secure housing independently

HPAC expects that doing so will concurrently prioritize the target subpopulations identified in the Yolo County 10-Year Plan to End Homelessness and the United States Interagency Council on Homelessness' (USICH) Opening Doors: A Federal Strategic Plan to Prevent and End Homelessness. These target subpopulations include:

- Individuals or families with a history of chronic homelessness
- Families with a history of homelessness
- Transition age youth with a history of homelessness (age 18 to 24)
- Unaccompanied youth with a history homelessness (meaning an individual under the age of 18 with no family member over the age of 18 in the household)
- Veterans with a history of homelessness (meaning an individual or family member who has served in active United States military duty)

#### **TH Minimum Service Standards**

HPAC designates the following as minimum service standards:

- Project participation cannot exceed 24 months
- Supportive services must be provided throughout the entire length of stay
- Supportive services may be provided to former residents of transitional housing and current residents of
  permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving
  transitional housing or homelessness, respectively, to assist their adjustment to independent living
- Project providers must offer assistance in transitioning toward securing permanent housing
- Project participants must enter into a lease agreement for a term of at least one month
- The lease agreement must be automatically renewable upon expiration, expect on prior notice by either party, up to a maximum term of 24 months

<sup>&</sup>lt;sup>12</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1

• Meet the minimum services standards for all project types, as described at the end of this chapter

# **Permanent Supportive Housing (PSH)**

HPAC defines permanent supportive housing (PSH) as housing that provides indefinite leasing or rental assistance and supportive services.

# **PSH Eligibility**

In order to be eligible for PSH projects, individuals or at least one family member must meet the definition for one of the following categories:

- Literally homeless
- Fleeing/attempting to flee domestic violence

In addition, individuals or at least one member of the family must:

- Have a disability
  - o Evidence of diagnosis with one or more of the following conditions:
    - Substance use disorder
    - Serious mental illness
    - Developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Acts of 2000 (42 U.S.C. 15002)
    - Post-traumatic stress disorder
    - Cognitive impairments resulting from brain injury
    - Chronic physical illness or disability
- Meet any funder-specific eligibility requirements

# **PSH Prioritization**

For CoC-funded PSH beds dedicated or prioritized for occupancy by persons experiencing chronic homelessness, HPAC requires the projects use the following order of priority, pursuant to Notice CPD-16-11<sup>13</sup>, which supersedes Notice CPD-14-012<sup>14</sup>:

- Persons experiencing chronic homeless with the longest length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter
- Persons with the most severe service needs

For projects using the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) as an assessment tool, HPAC designates the following as priority populations:

- Individuals who receive a VI-SPDAT-Single score of 8 or greater; or
- Families who receive a VI-SPDAT-Family score of 9 or greater

<sup>13</sup> HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf

<sup>&</sup>lt;sup>14</sup> HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf

In addition, consistent with Notice CPD 16-11, HPAC shall only allow PSH dedicated projects to serve other homeless individuals and families, when no persons within the designated service area meet the specified criteria listed above. If this occurs and there is a vacant dedicated PSH bed available, the provider may then follow the order of priority for non-dedicated PSH beds listed below. The bed will continue to be a dedicated bed, however, so when that bed becomes vacant again it must be used to house a chronically homeless person unless there are still no persons who meet that criterion within the designated service area. Regardless of if this occurs or not, the provider must continue to report the dedicated PSH beds as "Chronically Homeless" beds on HPAC's Housing Inventory Count (HIC).

For CoC-funded PSH beds not dedicated or not prioritized for persons experiencing chronic homeless, HPAC designates the following as priority populations pursuant to Notice CPD-16-11<sup>15</sup>, which supersedes Notice CPD-14-012<sup>16</sup>:

- **First priority:** Homeless individuals and families with a disability with long periods of episodic homelessness and severe service needs
  - O An individual or family that is eligible for CoC Program-funded PSH who has experienced at least four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months and has been identified as having severe service needs
- Second priority: Homeless individuals and families with a disability with severe service needs
  - o An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing persons that meet this order of priority, but there is not a minimum length of time required
- Third priority: Homeless individuals and families with a disability coming from places not meant for human habitation, a safe haven, or an emergency shelter without severe service needs
  - An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing persons that meet this order of priority, but there is not a minimum length of time required
- Fourth priority: Homeless individuals and families with a disability coming from transitional housing
  - An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in a safe haven, or in an emergency shelter. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for

<sup>16</sup> HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf

<sup>&</sup>lt;sup>15</sup> HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf

human habitation, a safe haven, or an emergency shelter prior to entry in the transitional housing

Also pursuant to Notice CPD-16-11, HPAC requires that all CoC-funded PSH projects accept referrals only through a single prioritized waiting list, created through the coordinated entry process.

#### **PSH Minimum Service Standards**

HPAC designates the following as minimum service standards:

- No designated length of stay
- Supportive services must be provided throughout the entire length of stay
- Project participants must enter into a lease, sublease, or occupancy agreement for a term of at least one
  year, with the agreement automatically renewing upon expiration for a term of at least one month
  - While generally expecting compliance with the terms stated above, HPAC permits PSH project managers to exercise discretion when executing lease, sublease, or occupancy agreements, particularly regarding terminable causes
- Meet the minimum services standards for all project types, as described at the end of this chapter

# **Minimum Services Standards for all Project Types**

Domestic Violence, Dating Violence, Human Trafficking, Sexual Assault, and Stalking Victims

HPAC prohibits all victim service providers from using HMIS. HPAC hopes that these provisions shall protect the safety and maintain the confidentiality of victims.

# **Housing First**

All CoC and ESG-funded projects must use a Housing First approach, which focuses on assisting people experiencing homelessness by securing housing as quickly as possible, and then providing supportive services as needed to promote housing stability and individual well-being. Pursuant to 25 California Code of Regulations 8409 Core Practices, 17 this includes:

- Ensuring low-barrier, easily accessible assistance to all people, including but not limited to people with no income or income history, and people with active substance use or mental health issues
- Helping participants quickly identify and resolve barriers to obtaining and maintaining housing
- Providing linkage to financial assistance for move-in and stabilization costs as well as housing case management
- Seeking to quickly resolve the housing crisis before focusing on other non-housing related services
- Allowing participants to choose the services and housing that meets their needs, within practical limitations, understanding that housing may cost greater than 30% of income and be precarious
- Preventing exits into homelessness whenever possible, even when program rules are violated:

<sup>&</sup>lt;sup>17</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1

- People who pose an imminent risk of harm to themselves or others may be exited to more appropriate assistance, such as a more intensive program or hospital
- Allowing participants currently in emergency shelter or transitional housing to only move to other emergency shelter or transitional housing when:
  - They desire and choose
  - It is more appropriate to meet their health and safety needs (e.g., persons in early recovery; domestic violence survivors; those who need special accommodations)
  - No permanent housing solution (with or without supportive services) is currently available that is a similar or better match for their preferences and needs
- Connecting participants to appropriate support and services available in the community that foster longterm housing stability
- Assisting participants create and update individualized Housing Plans designed to re-house and stabilize participants as quickly as possible
- Ensuring all staff helping to house participants know how to access an array of housing options directly or through HPAC's coordinated entry system to help participants achieve their Housing Plan goals
- Ensuring all staff are aware of and know how to access other community resources that can help participants achieve their Housing Plan goals
- Ensuring all participants and staff are aware that participation in services unrelated to obtaining permanent housing is voluntary

#### **HMIS**

All CoC and ESG-funded projects must ensure that data on all persons served and all activities provided are entered into HMIS (or a comparable database if the agency is a domestic violence, dating violence, human trafficking, sexual assault, and stalking victims service provider) pursuant to HUD and local standards.

#### **Preventing Involuntary Family Separation**

HPAC prohibits all CoC and ESG-funded projects from denying admission or involuntarily separating a family unless the health and/or well-being of a family member is at immediate risk. Pursuant to HUD, HPAC's defines a family as any group of persons who presents for assistance together and identifies themselves as a family.

#### Progressive Engagement and Assistance

Another local priority is implementing progressive engagement and assistance practices. Pursuant to 25 California Code of Regulations 8409 Core Practices, <sup>18</sup> this includes:

- Offering financial assistance and services in a way that offers a minimum amount of assistance initially
- Adding more assistance over time if needed to quickly resolve a housing crisis by either ending homelessness or avoiding an immediate return to literal homelessness

<sup>&</sup>lt;sup>18</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1

0	The type, duration, and amount of assistance offered shall be based on an individual assessment of the household, and the availability of other resources or support systems to resolve their housing crisis and stabilize them in housing

### **Nondiscrimination Provisions**

Pursuant to civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II and III of the Americans with Disabilities Act, all CoC and ESG-funded project implementation must comply with federal nondiscrimination provisions. This includes Attorney General Order No. 2353-2001, 66 Fed. Reg. 3616<sup>19</sup>, which states that agencies should not withhold certain services based on immigration status when the services are necessary to protect life and/or safety.

.

<sup>&</sup>lt;sup>19</sup> U.S. Department of Justice, U.S. Department of Health and Human Services, and U.S. Department of Housing and Urban Development Joint Letter Regarding Immigration Access to Housing and Services: https://www.hudexchange.info/resources/documents/HUD-HHS-DOJ-Letter-Regarding-Immigrant-Access-to-Housing-and-Services.pdf

# Measure 1a: Length of Time Persons Remain Homeless (do not include data from element 3.17.1.A)

	Previous FY Universe (Persons)	Current FY Universe (Persons)	Previous FY Average LOT Homeless	Current FY Average LOT Homeless	Difference	Previous FY Median LOT Homeless	Current FY Median LOT Homeless	Difference
Persons in ES and SH	342	410	48	44	-4	38	35	-3
Persons in ES and SH and TH	740	757	104	106	2	74	65	-9

## Measure 1b: Length of Time Persons Remain Homeless (include data from element 3.17.1.A)

	Previous FY Universe (Persons)	Current FY Universe (Persons)	Previous FY Average LOT Homeless	Current FY Average LOT Homeless	Difference	Previous FY Median LOT Homeless	Current FY Median LOT Homeless	Difference
Persons in ES and SH	342	410	51	128	77	40	72	32
Persons in ES and SH and TH	740	757	112	179	67	77	119	42

# Measure 2a and 2b: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within 6 to 12 months (and 24 months in a separate calculation)

	Total Number of Persons who Exited to a Permanent Housing Destination (2 Years Prior)	Number Returning to Homelessness in Less than 6 Months (0 - 180 days)	Percentage of Returns in Less than 6 Months (0 - 180 days)	Number Returning to Homelessness from 6 to 12 Months (181 - 365 days)	Percentage of Returns from 6 to 12 Months (181 - 365 days)	Number Returning to Homelessness from 13 to 24 Months (366 - 730 days)	Percentage of Returns from 13 to 24 Months (366 - 730 days)	Number of Returns in 2 Years	Percentage of Returns in 2 Years
Exit was from SO	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Exit was from ES	31	0	0.00%	2	6.45%	0	0.00%	2	6.45%
Exit was from TH	106	4	3.77%	7	6.60%	2	1.89%	13	12.26%

# CA-521

Date Range: 10/01/2014 and 09/30/2015

Exit was from SH	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Exit was from PH	4	0	0.00%	0	0.00%	0	0.00%	0	0.00%
TOTAL Returns to Homelessness	141	4	2.84%	9	6.38%	2	1.42%	15	10.64%

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

# Metric 3.1 Change in PIT counts of sheltered and unsheltered homeless persons

	Previous FY PIT Count	Current FY PIT Count	Difference
Universe: Total PIT Count of sheltered and unsheltered persons			
Emergency Shelter Total			
Safe Haven Total			
Transitional Housing Total			
Total Sheltered Count			
Unsheltered Count			

## Metric 3.2 Change in annual counts of sheltered homeless persons in HMIS

	Previous FY	Current FY	Difference
Universe: Unduplicated Total sheltered homeless persons	745	771	26
Emergency Shelter Total	349	417	68
Safe Haven Total	0	0	0
Transitional Housing Total	459	414	-45

# Measure 4: Employment and Income Growth for Homeless Persons in CoC Programfunded Projects

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

	Previous FY	Current FY	Difference
Universe: Number of adults (system stayers)	3	2	-1
Number of adults with increased earned income	0	0	0
Percentage of adults who increased earned income	0	0.00%	0.00%

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

	Previous FY	Current FY	Difference
Universe: Number of adults (system stayers)	3	2	-1
Number of adults with increased non-employment cash income	0	0	0
Percentage of adults who increased non-employment cash income	0	0.00%	0.00%

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

	Previous FY	Current FY	Difference
Universe: Number of adults (system stayers)	3	2	-1
Number of adults with increased total income	0	0	0
Percentage of adults who increased total income	0.00%	0.00%	0.00%

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

	Previous FY	Current FY	Difference
Universe: Number of adults who exited (system leavers)	29	27	-2
Number of adults who exited with increased earned income	10	14	4
Percentage of adults who increased earned income	34.48%	51.85%	17.37%

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

	Previous FY	Current FY	Difference
Universe: Number of adults who exited (system leavers)	29	27	-2
Number of adults who exited with increased non-employment cash income	0	5	5
Percentage of adults who increased non-employment cash income	0.00%	18.52%	18.52%

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

	Previous FY	Current FY	Difference
Universe: Number of adults who exited (system leavers)	29	27	-2
Number of adults who exited with increased total income	10	16	6
Percentage of adults who increased total income	34.48%	59.26%	24.78%

# Measure 5: Number of Persons who Become Homeless for the First Time

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

	Previous FY	Current FY	Difference
Universe: Person with entries into ES, SH or TH during the reporting period.	595	641	46
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.	54	131	77
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)	541	510	-31

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

	Previous FY	Current FY	Difference
Universe: Person with entries into ES, SH, TH or PH during the reporting period.	673	698	25
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.	73	131	58
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)	600	567	-33

# Measure 6: Homeless Prevention and Housing Placement of Persons Defined by Category 3 of HUDs Homeless Definition in CoC Program-funded Projects

Metrics 6a.1 and 6b.1 Returns to ES, SH, TH, and PH projects after exits to permanent housing destinations within 6 and 12 months (and 24 months in a separate calculation)

	Total Number of Persons who Exited to a Permanent Housing Destination (2 Years Prior)	Number Returning to Homelessness in Less than 6 Months (0 - 180 days)	Percentage of Returns in Less than 6 Months (0 - 180 days)	Number Returning to Homelessness from 6 to 12 Months (181 - 365 days)	Percentage of Returns from 6 to 12 Months (181 - 365 days)	Number Returning to Homelessness from 13 to 24 Months (366 - 730 days)	Percentage of Returns from 13 to 24 Months (366 - 730 days)	Number of Returns in 2 Years	Percentage of Returns in 2 Years
Exit was from SO									
Exit was from ES									
Exit was from TH	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Exit was from SH	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Exit was from PH	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%
TOTAL Returns to Homelessness	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%

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

## Metric 7a.1 Change in exits to permanent housing destinations

	Previous FY	Current FY	Difference
Universe: Persons who exit Street Outreach	0	0	0
Of persons above, those who exited to temporary & some institutional destinations	0	0	0
Of the persons above, those who exited to permanent housing destinations	0	0	0
% Successful exits	0.00%	0.00%	0.00%

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

	Previous FY	Current FY	Difference
Universe: Persons in ES, SH, TH and PH-RRH who exited	612	596	-16
Of the persons above, those who exited to permanent housing destinations	316	315	-1
% Successful exits	51.63%	52.85%	1.22%

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

	Previous FY	Current FY	Difference
Universe: Persons in all PH projects except PH-RRH	61	53	-8
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	57	49	-8
% Successful exits/retention	93.44%	92.45%	-0.99%

List	of	Pi	og	ra	ms

[Davis Community Meals-Yolo] Cesar Chavez Plaza-PSH

[Davis Community Meals-Yolo] Family Transitional Housing

[Davis Community Meals-Yolo] PSH-Chronic Individuals

[Davis Community Meals-Yolo] Transitional Housing for Men and Women

[Empower Yolo] CalWORKS Housing Allocation

[Empower Yolo] United Way Financial Coaching

[Empower Yolo] YFRC-ESG Homeless Prevention

[Empower Yolo] YFRC-ESG Rapid Re-Housing

[Fourth and Hope-Yolo] Bridge to Health and Housing

[Fourth and Hope-Yolo] DO NOT USE: Emergency Shelter - PATH

[Fourth and Hope-Yolo] DO NOT USE: Housing - Singles TH (DRC, Self-Pay, ELMO, Probation)

[Fourth and Hope-Yolo] DO NOT USE: Housing - Sober Living Environment (165 4th Street)

[Fourth and Hope-Yolo] DO NOT USE: TH - HUD CoC - Family TH & WH Singles TH (1267/1271 E.Oak #A-D; WH; 165 4th St.)

[Fourth and Hope-Yolo] Emergency Shelter

[Fourth and Hope-Yolo] Emergency Shelter - GAP

[Fourth and Hope-Yolo] Housing - HUD CoC - PSH 2012 Reallocation (938 North #C; 925 North #3)

[Fourth and Hope-Yolo] Housing - HUD CoC - PSH 2013 Reallocation (1275 E.Oak #C)

List of Programs
[Fourth and Hope-Yolo] Housing - HUD CoC - PSH 2014 Reallocation
[Fourth and Hope-Yolo] Housing - HUD CoC - PSH 2015 Reallocation
[Fourth and Hope-Yolo] Housing - HUD CoC - PSH Families (586 CA #6; 932 North #B)
[Fourth and Hope-Yolo] Housing - HUD CoC - PSH Singles (586 CA #9)
[Fourth and Hope-Yolo] Walter's House - Out-Patient Treatment Program
[Fourth and Hope-Yolo] Walter's House - Residential Treatment Program
[New Pathways-Yolo] New Pathways
[Shores of Hope-Yolo] Family Transitional Housing Program
[Yolo Community Care Continuum] Farmhouse
[Yolo Community Care Continuum] Harmony House
[Yolo Community Care Continuum] Housing Now
[Yolo Community Care Continuum] Safe Harbor Crisis House
[Yolo Community Care Continuum] Supportive Housing Program-HUD
[Yolo Community Care Continuum] YCCC Supported Housing-Non HUD
[Yolo County Health and Human Services Agency] Homeless Neighborhood Court
[Yolo County Health and Human Services Agency] Yolo County Homeless Outreach



# **Yolo County Homeless and Poverty Action Coalition (HPAC)**

Policies and Procedures Manual

Davis/Woodland/Yolo County Continuum of Care (CA-521) *Adopted August 24, 2016* 

# **Table of Contents**

Table of Contents	1
Overview	2
About HPAC	2
Coordinated Entry	3
Points of Entry	3
Assessment, Referral and Placement Process	3
Process for Victims of Domestic Violence, Dating Violence, Human Trafficking, Sexual Assault, and Staki	ng4
Service Standards	5
Definitions of Homelessness	5
Recordkeeping and Reporting Requirements	7
Prevention	8
Street Outreach (SO)	
Emergency Shelter (ES)	10
Rapid Re-Housing (RRH)	
Transitional Housing (TH)	13
Permanent Supportive Housing (PSH)	15
Minimum Services Standards for all Project Types	17

### **Overview**

Pursuant to 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule<sup>1</sup>, this document shall serve as the policies and procedures manual for the Davis/Woodland/Yolo County Continuum of Care (CA-521), hereafter known as the Homeless and Poverty Action Coalition (HPAC). As a counterpart to HPAC's Governance Charter, this manual shall be reviewed, revised, and re-ratified with the Governance Charter every October upon a majority vote of all voting members present during the scheduled meeting.

This manual shall contain most relevant information required by 24 CFR Part 578 Subpart B that is not included in HPAC's Governance Charter. The only exception is information pertinent to the region's local Homeless Management Information System (HMIS). HPAC's HMIS Policies and Procedures Manual shall contain this information, which includes a privacy, security, and data quality plan.

### **About HPAC**

HPAC is a local planning body that provides leadership and coordination on the issues of homelessness and poverty in Yolo County. HPAC serves numerous roles and responsibilities, many of which fulfill federal, state and local government mandates. Such activities include, but are not limited to:

- Implementing the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act
- Implementing the region's Homeless Management Information System (HMIS)
- Maintaining a coordinated response among service providers to ensure continuity of services
- Assessing needs and identifying gaps in services for persons facing homelessness in Yolo County on an ongoing basis
- Supporting the planning, funding, and development of services to meet prioritized needs within Yolo County
- Planning, developing, and sustaining options to meet the housing needs of people facing homelessness
- Promoting access to and effective utilization of mainstream human services programs

<sup>&</sup>lt;sup>1</sup> 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578\_165

### **Coordinated Entry**

HPAC is currently in the process of conducting a comprehensive community engagement process to design its permanent coordinated entry system. In the meantime, HPAC has implemented an interim coordinated entry system that is intended to quickly connect households with the most appropriate type of housing and services. The interim system will serve as a pilot, with successful components of the interim solution being integrated into the permanent coordinated entry system.

### **Points of Entry**

HPAC has selected a "no wrong door" approach to its interim coordinated entry system. All local providers of homeless services are eligible to participate as a point of entry to the system, as long as they meet the following minimum requirements:

- Have access to HMIS or a comparable database as permitted by the United States Department of Housing and Urban and Development (HUD) for domestic violence, dating violence, human trafficking, sexual assault, and stalking victim service providers
- Opt-in to the HPAC Data Sharing Agreement
- Receive training on use of the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT)

### **Assessment, Referral and Placement Process**

Each point of entry to the interim system uses the following three steps to assist homeless individuals and families in connecting with appropriate services based on their unique needs and vulnerability.

- 1. **Assessment**: Each homeless individual and family is assessed using the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT). The VI-SPDAT is used to (1) determine the chronicity and vulnerability of homeless individuals (including critical health and safety needs), and (2) identify which type of permanent housing solution (permanent supportive housing, rapid re-housing or affordable housing) is most appropriate. Each individual receives a score based on the assessment, with a higher VI-SPDAT score indicating that the individual or family is more vulnerable. For individuals who receive a lower VI-SPDAT score and indicate that they have other safe and appropriate housing options or resources, HPAC shall link them to homeless prevention assistance as needed and available. This may also include linkage to other appropriate services from various providers based on individual need.
- 2. **Referral**: HPAC uses the results from the VI-SPDAT to refer the individual or family to the most appropriate type of housing and services. In the permanent coordinated entry system, it is HPAC's hope to establish a community queue, where HPAC maintains and prioritizes all referrals on one list.
- 3. Placement: Those individuals or families who have the highest VI-SPDAT scores (meaning they are the most vulnerable) are prioritized first for housing and services as slots become available. Individuals or families who cannot immediately be placed in permanent housing continue to receive services from outreach workers or other providers while they wait for a bed.

# Process for Victims of Domestic Violence, Dating Violence, Human Trafficking, Sexual Assault, and Staking

Pursuant to 24 CFR Subpart B Section 578.7<sup>2</sup>, HPAC shall implement a separate coordinated entry process for victims of domestic violence, dating violence, human trafficking, sexual assault, staking, and any other dangerous or life-threatening conditions that relate to violence against a homeless individual or family.

To protect the safety and maintain the confidentiality of such survivors, HPAC prohibits victim service providers from using HMIS. Rather, HPAC requires that victim service providers use a comparable database as permitted by HUD.

To ensure that homeless survivors receive the same opportunities afforded by the region's coordinated entry system as all others, HPAC implements the following process:

- If an individual or family experiencing homelessness presents to a non-victim service provider and either self-identifies herself, himself or a family member as a victim or reveals any information that implies dangerous or life-threatening conditions that relate to violence, the provider must refer the individual or family to a victim service provider.
- 2. Upon connecting, the victim service provider shall perform an intake assessment of the individual or family to determine if the survivor is eligible for shelter entry based on lethality as well as bed availability.
- 3. If the victim service provider deems that the individual or family does not have adequate resources to exit homelessness on her, his or their own, the provider shall conduct a VI-SPDAT.
- 4. Once complete, the provider shall send an anonymous VI-SPDAT to the County Homeless Program Coordinator. The only personal identifying information shall be the unique identification number indicating the appropriate record within the victim service provider's comparable database.
- 5. HPAC will then integrate the anonymous victim service referrals into its community queue. In addition, HPAC shall require training specifically related to this process. In particular, HPAC shall train coordinated entry staff on the confidentiality and privacy rights of survivors protected by the Health Insurance Portability and Accountability Act (HIPAA) as well as the Violence Against Women Act (VAWA).

<sup>&</sup>lt;sup>2</sup> 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578\_165

### **Service Standards**

This section of the manual shall define HPAC's expected service standards for local projects receiving funding from HUD, including projects funded by the Continuum of Care (CoC) and/or Emergency Solutions Grant (ESG) programs. This section shall define the different categories of homelessness as well as define the recordkeeping and reporting requirements and shall provide written standards for applicable projects providing services in any of the following areas:

- Prevention
- Street Outreach
- Emergency Shelter
- Rapid Re-Housing
- Transitional Housing
- Permanent Supportive Housing

### **Definitions of Homelessness**

HPAC shall expect all CoC and/or ESG funded programs to use the following definitions of homelessness, as determined by 24 CFR Parts 91, 578, 582, and 583<sup>3 and 4</sup>. The definitions are also pursuant to federal ESG regulations 24 CFR Subpart A Section 576.2<sup>5</sup>.

	An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
	<ul> <li>Unsheltered Homelessness: The individual or family has a primary nighttime residence that is a public or private place not meant for human habitation;</li> </ul>
Literally Homeless	<ul> <li>Sheltered Homelessness: The individual or family is living in a publicly or privately operated shelter designated to provide temporary living arrangements—including congregate shelters and hotels and motels paid for by charitable organizations or by federal, state, and local government programs; or</li> <li>Institutional Homelessness: The individual is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution</li> </ul>

<sup>&</sup>lt;sup>3</sup> 24 CFR Parts 91, 582, and 583 Final Rule on Homeless Definitions:

https://www.hudexchange.info/resources/documents/HEARTH\_HomelessDefinition\_FinalRule.pdf

<sup>&</sup>lt;sup>4</sup> 24 CFR Parts 91 and 578 Final Rule on Chronically Homeless Definition:

https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf

<sup>&</sup>lt;sup>5</sup> 24 CFR Parts 91 and 576 Homeless Emergency Assistance and Rapid Transition to Housing: Emergency Solutions Grants Program and Consolidation Plan Conforming Amendments:

https://www.hudexchange.info/resources/documents/HEARTH ESGInterimRule&ConPlanConformingAmendments.pdf

	An individual or family who will imminently lose their primary nighttime residence, provided that:
	<ul> <li>The individual or family has an annual income below 30 percent of the median family income for the geographic area; and</li> <li>The individual or family has insufficient resources or support networks immediately available to attain housing stability</li> </ul>
	In addition, the individual or family must also meet one of the following risk factors:
	<ul> <li>Has moved two or more times during the 60 days immediately preceding the application for homelessness prevention assistance because of economic reasons;</li> </ul>
Imminent Risk of Homelessness	<ul> <li>Is living in the home of another because of economic hardship;</li> <li>Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;</li> </ul>
	<ul> <li>Lives in a hotel or motel not paid for by federal, state, or local government programs for low-income individuals or charitable organizations;</li> </ul>
	<ul> <li>Lives in a single-room occupancy or efficiency apartment unit in which more than two persons, on average, reside or another type of housing in which there reside more than 1.5 persons per room as defined by the U.S. Census Bureau;</li> </ul>
	<ul> <li>Is exiting a publicly funded institution or system of care, such as a healthcare facility, mental health facility, foster care, or other you facility, or correction program or institution; or</li> </ul>
	<ul> <li>Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness</li> </ul>
	Unaccompanied youth under 25 years of age or families with children and youth, who do not otherwise qualify as homeless under the definition stated above, but who:
Homeless under other Federal Statutes	<ul> <li>Are defined as homeless under the other listed federal statutes;</li> <li>Have not signed a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance</li> </ul>
	<ul> <li>application;</li> <li>Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and</li> </ul>
	Can be expected to continue in such status for an extended period of time due to special needs or barriers
Fleeing/Attempting to	An individual or family who:
Flee Domestic Violence	<ul> <li>Is fleeing or is attempting to flee domestic violence;</li> <li>Has no other residence; and</li> </ul>

	Lacks the resources or support networks to obtain other permanent housing
Chronically Homeless	<ul> <li>An individual or family who:</li> <li>Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and</li> <li>Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least one year or on at least four separate occasions in the last three years, where the cumulative total of the four occasions is at least one year. Stays in institutions of 90 days or less will not constitute as a break in homelessness, but rather such stays are included in the cumulative total; and</li> <li>Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; or</li> <li>An individual who has been residing in an institutional care facility, including a jail, substance use or mental health treatment facility, hospital, or other similar facility for fewer than 90 days and met all of the criteria listed in paragraph 1 before entering the facility; or</li> <li>A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria listed in paragraph 1 including a family whose composition has fluctuated while the head of household has been homeless</li> </ul>

### **Recordkeeping and Reporting Requirements**

Pursuant to 24 CFR Parts 91 and 576 Section 576.500 (b-e) <sup>6</sup>, HPAC shall expect that all CoC and/or ESG funded projects comply with federal recordkeeping and reporting requirements.

HPAC shall require that agencies upload the documentation specified in 24 CFR Parts 91 and 576, Section 576.500 (b-e)<sup>7</sup> into the region's HMIS. Described in more detail within HPAC's HMIS Policies and Procedures Manual, the HMIS Daily Operator shall monitor and ensure compliance with such requirements on a quarterly basis.

<sup>&</sup>lt;sup>6</sup> 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578\_165

<sup>&</sup>lt;sup>7</sup> 24 Code of Federal Regulations (CFR) Part 578 Continuum of Care Program Interim Rule: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=5d030234903ffc25ad85a1fe4656bff7&mc=true&n=pt24.3.578&r=PART&ty=HTML#se24.3.578\_165

### Prevention

HPAC defines prevention as services that are necessary to prevent an individual or family from becoming homeless. These services include various housing relocation and stabilization services as well as short to medium term rental assistance.

At present, HPAC does not permit prevention using ESG funds as a stand-alone activity. Rather, prevention must be provided in conjunction with rapid re-housing and/or emergency shelter. For rapid re-housing, HPAC's intention is to facilitate preventing homelessness of a previously assisted individual or family who is experiencing instability after rapid re-housing assistance has ended. For emergency shelter, HPAC's intention is to facilitate shelter diversion.

### Prevention Eligibility

In order to be eligible for prevention services, an individual or at least one family member must:

Meet the definition for imminent risk of homelessness

### **Prevention Prioritization**

Of the eligible individuals and families, HPAC designates the following as priority populations pursuant to 25 California Code of Regulations 8409 Core Practices<sup>8</sup>:

 Individuals or families who are at the greatest risk of becoming literally homeless without an intervention and are at greatest risk of experiencing a longer time in shelter or on the street should they become homeless

### **Prevention Minimum Service Standards**

HPAC designates the following as minimum service standards for programs offering prevention services:

- Must either assist the individual or family to regain stability in their current housing or move into other permanent housing and achieve stability in that housing
- For project participants who receive prevention assistance in conjunction with rapid re-housing, providers must conduct a 3-month evaluation
- Services may include, but are not limited to:
  - Rental assistance (such as paying all or a portion of the client's rent)
  - Other financial assistance (such as rental application fees, security and utility deposits, utility payments, last month's rent, rent in arrears, and moving costs)
  - Housing placement and retention assistance (such as search and placement, case management, landlord mediation, tenant legal services, credit repair, financial coaching, bills, and arrears)
- Meet the minimum services standards for all project types, as described at the end of this chapter

<sup>&</sup>lt;sup>8</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1

### Street Outreach (SO)

HPAC defines street outreach (SO) as services that engage individuals or families experiencing unsheltered homelessness and assist in improving the health and well-being of the individual or family.

### SO Eligibility

In order to be eligible for SO services, an individual or at least one family member must:

- Meet the definition for literally homeless
- Live in unsheltered homelessness at the time of first contact

#### SO Prioritization

Pursuant to 25 California Code of Regulations 8409 Core Practices<sup>9</sup>, SO projects shall use the VI-SPDAT as an assessment tool to prioritize the individuals and families with the most urgent and severe needs. This includes:

- Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings
- Have experienced the longest amount of time homeless
- Have multiple and severe service needs that inhibit their ability to quickly identify and secure housing on their own

This practice aligns with HPAC's envisioned permanent coordinated entry system and shall ensure access to assistance regardless of where an individual or family is located within HPAC's service region.

In general, HPAC expects that using the VI-SPDAT will concurrently prioritize the target subpopulations identified in the Yolo County 10-Year Plan to End Homelessness and the United States Interagency Council on Homelessness' (USICH) Opening Doors: A Federal Strategic Plan to Prevent and End Homelessness. These target subpopulations include:

- Individuals or families with a history of chronic homelessness
- Families with a history of homelessness
- Transition age youth with a history of homelessness (age 18 to 24)
- Unaccompanied youth with a history homelessness (meaning an individual under the age of 18 with no family member over the age of 18 in the household)
- Veterans with a history of homelessness (meaning an individual or family member who has served in active United States military duty)

### SO Minimum Service Standards

HPAC designates the following as minimum services standards for projects offering street outreach services:

- Participants and staff understand that the primary goals of street outreach are to:
  - Provide access to emergency shelter and services

<sup>&</sup>lt;sup>9</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

 $https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText\&originationContext=document \\ nttoc\&transitionType=CategoryPageItem\&contextData=(sc.Default)\&bhcp=1$ 

- Re-house participants in permanent housing as quickly as possible, regardless of other personal issues or concerns
- Conduct outreach to engage unsheltered homeless individual or families
- Link unsheltered homeless individual or families to the region's coordinated entry system
- Accept triage referrals through HPAC's coordinated entry system
- Meet the minimum services standards for all project types, as described at the end of this chapter

### **Emergency Shelter (ES)**

HPAC defines emergency shelter (ES) as a living arrangement that provides temporary shelter and supportive services, without a standard lease agreement.

### **ES Eligibility**

In order to be eligible for ES projects, individuals or at least one family member must meet the definition for one of the following categories:

- Literally homeless
- Fleeing/attempting to flee domestic violence, dating violence, human trafficking, sexual assault, staking, and any other dangerous or life-threatening conditions that relate to violence against a homeless individual or family

HPAC allows shelters to serve a specific sub-population (such as persons with mental illness or victims of domestic violence, dating violence, human trafficking, sexual assault and/or stalking) within the definitions above, depending on organizational missions and goals.

### **ES Prioritization**

Of the eligible individuals and families, HPAC shall prioritize those with the most urgent and severe needs. Pursuant to 25 California Code of Regulations 8409 Core Practices<sup>10</sup>, this includes but is not limited to those who:

- Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings
- Have experienced the longest amount of time homeless
- Have multiple and severe service needs that inhibit their ability to quickly identify and secure housing on their own

HPAC expects that doing so will concurrently prioritize the target subpopulations identified in the Yolo County 10-Year Plan to End Homelessness and the United States Interagency Council on Homelessness' (USICH) Opening Doors: A Federal Strategic Plan to Prevent and End Homelessness. These target subpopulations include:

- Individuals or families with a history of chronic homelessness
- Families with a history of homelessness

<sup>10</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

 $https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText\&originationContext=document \\ nttoc\&transitionType=CategoryPageItem\&contextData=(sc.Default)\&bhcp=1$ 

- Transition age youth with a history of homelessness (meaning an individual or family member age 18 to 24)
- Unaccompanied youth with a history homelessness (meaning an individual under the age of 18 with no family member over the age of 18 in the household)
- Veterans with a history of homelessness (meaning an individual or family member who has served in active United States military duty)

### **ES Minimum Standards**

HPAC designates the following as minimum service standards for projects providing emergency shelter services:

- Participants and staff must understand that the primary goals of the emergency shelter are to:
  - o Provide temporary accommodation that is safe, respectful, and responsive to individual needs
  - Re-house participants in permanent housing as quickly as possible, regardless of other personal issues or concerns
- No minimum or maximum length of stay for project participants; however, providers may determine a
  target length of stay for participants (such as 90 days), at which point the participant's case may be reassessed to determine whether a longer stay is appropriate.
- No leases or occupancy agreements
- Meet the minimum services standards for all project types, as described at the end of this chapter

### Rapid Re-Housing (RRH)

HPAC defines rapid re-housing (RRH) as housing that provides short to medium term move-in and rental assistance, as well as assistance with housing identification and supportive services.

### RRH Eligibility

In order to be eligible for RRH projects, individuals or at least one family member must meet the definition for one of the following categories:

- Literally homeless
- Imminent risk of homelessness (only if the individual or at least one family member qualifies for prevention per HPAC's standards)
- Fleeing/attempting to flee domestic violence, dating violence, human trafficking, sexual assault, staking, and any other dangerous or life-threatening conditions that relate to violence against a homeless individual or family

In addition, individuals or at least one member of the family must:

- Earn enough income to pay at least 30% of their monthly rent or at least 30% of their monthly income, whichever is lower
  - HPAC considers monthly income to consist of:
    - Earned income
    - Self-employment/business income
    - Interest and dividend income
    - Pension/retirement income

- Unemployment and disability income
- Temporary Assistance for Needy Families (TANF)/public assistance
- Alimony, child support, and foster care income
- Armed forces income
- While generally expecting households to pay at least 30% of their monthly rent or monthly income, HPAC permits RRH project managers to authorize lesser contributions under extraordinary circumstances
- At times, this may include paying the entire rent on behalf of households that have no current income
- Meet any funder-specific eligibility requirements

### **RRH Prioritization**

Of the eligible individuals and families, HPAC shall prioritize those with the most urgent and severe needs. Pursuant to 25 California Code of Regulations 8409 Core Practices<sup>11</sup>, this includes but is not limited to those who:

- Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings
- Have experienced the longest amount of time homeless
- Have multiple and severe service needs that inhibit their ability to quickly identify and secure housing on their own

In general, HPAC expects that doing so will concurrently prioritize the target subpopulations identified in the Yolo County 10-Year Plan to End Homelessness and the United States Interagency Council on Homelessness' (USICH) Opening Doors: A Federal Strategic Plan to Prevent and End Homelessness. These target subpopulations include:

- Individuals or families with a history of chronic homelessness
- Families with a history of homelessness
- Transition age youth with a history of homelessness (age 18 to 24)
- Unaccompanied youth with a history homelessness (meaning an individual under the age of 18 with no family member over the age of 18 in the household)
- Veterans with a history of homelessness (meaning an individual or family member who has served in active United States military duty)

For projects using the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) as an assessment tool, HPAC designates the following as priority populations:

- Individuals who receive a VI-SPDAT-Single score of 4 to 7; or
- Families who receive a VI-SPDAT-Family score of 4 to 8

**RRH Minimum Service Standards** 

.

<sup>&</sup>lt;sup>11</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1

HPAC designates the following as minimum service standards:

- Participants and staff must understand that the primary goals of RRH are to:
  - End homelessness
  - Move participants to permanent housing as quickly as possible, regardless of personal issues
- No maximum monetary amount for rental assistance; however, individual assistance may not exceed 24 months during a 3-year period
- For project participants who receive rental assistance, providers must conduct an annual evaluation to determine continued eligibility
  - At the time of evaluation, if a participant's income has changed, the amount of rental assistance will be adjusted to meet the 30% threshold
- For participants who receive prevention assistance, providers must conduct a 3-month evaluation
- For project-based assistance, providers must ensure a one-year lease
- All individuals or families that are literally homeless who cannot quickly secure housing on their own or
  with another form of assistance are screened for and offered rapid re-housing assistance, to the extent
  they are eligible and assistance is available
- Housing identification efforts must consider, within the limits of the participant's income, where the
  individual or family wants to live and if the individual or family feels safe
- Project providers must use a fair, yet flexible approach when determining the duration of assistance
- Project providers must use a fair, yet flexible approach when determining what qualifies as an extraordinary circumstance (whereas project participants do not need to meet the 30% threshold)
- Supportive services must be provided throughout the entire time that rental assistance is provided
- Must ensure that data on all persons served and all activities provided are entered into HMIS (or a comparable database if the agency is a domestic violence, dating violence, human trafficking, sexual assault, and stalking victims service provider) pursuant to HUD and local standards.
- Meet the minimum services standards for all project types, as described at the end of this chapter

### **Transitional Housing (TH)**

HPAC defines transitional housing (TH) as housing that provides temporary housing and supportive services, as an interim solution toward securing permanent housing. Unlike emergency shelter, transitional housing participants must enter into a lease agreement.

### TH Eligibility

In order to be eligible for TH projects, individuals or at least one family member must meet the definition for one of the following categories:

- Literally homeless
- Imminent risk of homelessness
- Homeless under other Federal Statutes (if the project(s) received approval from HUD to serve this category)

Fleeing/attempting to flee domestic violence

In addition, individuals or at least one member of the family must:

• Meet any funder-specific eligibility requirements

#### **TH Prioritization**

Of the eligible households, HPAC shall prioritize those with the most urgent and severe needs. Pursuant to 25 California Code of Regulations 8409 Core Practices<sup>12</sup>, this includes but is not limited to those who:

- Are unsheltered and living in places not designed for human habitation, such as cars, parks, bus stations, and abandoned buildings
- Have experienced the longest amount of time homeless
- Have multiple service needs that inhibit their ability to identify and secure housing independently

HPAC expects that doing so will concurrently prioritize the target subpopulations identified in the Yolo County 10-Year Plan to End Homelessness and the United States Interagency Council on Homelessness' (USICH) Opening Doors: A Federal Strategic Plan to Prevent and End Homelessness. These target subpopulations include:

- Individuals or families with a history of chronic homelessness
- Families with a history of homelessness
- Transition age youth with a history of homelessness (age 18 to 24)
- Unaccompanied youth with a history homelessness (meaning an individual under the age of 18 with no family member over the age of 18 in the household)
- Veterans with a history of homelessness (meaning an individual or family member who has served in active United States military duty)

#### **TH Minimum Service Standards**

HPAC designates the following as minimum service standards:

- Project participation cannot exceed 24 months
- Supportive services must be provided throughout the entire length of stay
- Supportive services may be provided to former residents of transitional housing and current residents of
  permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving
  transitional housing or homelessness, respectively, to assist their adjustment to independent living
- Project providers must offer assistance in transitioning toward securing permanent housing
- Project participants must enter into a lease agreement for a term of at least one month
- The lease agreement must be automatically renewable upon expiration, expect on prior notice by either party, up to a maximum term of 24 months

<sup>&</sup>lt;sup>12</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1

Meet the minimum services standards for all project types, as described at the end of this chapter

### **Permanent Supportive Housing (PSH)**

HPAC defines permanent supportive housing (PSH) as housing that provides indefinite leasing or rental assistance and supportive services.

### **PSH Eligibility**

In order to be eligible for PSH projects, individuals or at least one family member must meet the definition for one of the following categories:

- Literally homeless
- Fleeing/attempting to flee domestic violence

In addition, individuals or at least one member of the family must:

- Have a disability
  - o Evidence of diagnosis with one or more of the following conditions:
    - Substance use disorder
    - Serious mental illness
    - Developmental disability (as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Acts of 2000 (42 U.S.C. 15002)
    - Post-traumatic stress disorder
    - Cognitive impairments resulting from brain injury
    - Chronic physical illness or disability
- Meet any funder-specific eligibility requirements

### **PSH Prioritization**

For CoC-funded PSH beds dedicated or prioritized for occupancy by persons experiencing chronic homelessness, HPAC requires the projects use the following order of priority, pursuant to Notice CPD-16-11<sup>13</sup>, which supersedes Notice CPD-14-012<sup>14</sup>:

- Persons experiencing chronic homeless with the longest length of time in which an individual or family
  has resided in a place not meant for human habitation, a safe haven, or an emergency shelter
- Persons with the most severe service needs

For projects using the Vulnerability Index and Service Prioritization Decision Assistance Tool (VI-SPDAT) as an assessment tool, HPAC designates the following as priority populations:

- Individuals who receive a VI-SPDAT-Single score of 8 or greater; or
- Families who receive a VI-SPDAT-Family score of 9 or greater

<sup>13</sup> HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf

<sup>&</sup>lt;sup>14</sup> HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf

In addition, consistent with Notice CPD 16-11, HPAC shall only allow PSH dedicated projects to serve other homeless individuals and families, when no persons within the designated service area meet the specified criteria listed above. If this occurs and there is a vacant dedicated PSH bed available, the provider may then follow the order of priority for non-dedicated PSH beds listed below. The bed will continue to be a dedicated bed, however, so when that bed becomes vacant again it must be used to house a chronically homeless person unless there are still no persons who meet that criterion within the designated service area. Regardless of if this occurs or not, the provider must continue to report the dedicated PSH beds as "Chronically Homeless" beds on HPAC's Housing Inventory Count (HIC).

For CoC-funded PSH beds not dedicated or not prioritized for persons experiencing chronic homeless, HPAC designates the following as priority populations pursuant to Notice CPD-16-11<sup>15</sup>, which supersedes Notice CPD-14-012<sup>16</sup>:

- First priority: Homeless individuals and families with a disability with long periods of episodic homelessness and severe service needs
  - An individual or family that is eligible for CoC Program-funded PSH who has experienced at least four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months and has been identified as having severe service needs
- Second priority: Homeless individuals and families with a disability with severe service needs
  - An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing persons that meet this order of priority, but there is not a minimum length of time required
- Third priority: Homeless individuals and families with a disability coming from places not meant for human habitation, a safe haven, or an emergency shelter without severe service needs
  - An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing persons that meet this order of priority, but there is not a minimum length of time required
- Fourth priority: Homeless individuals and families with a disability coming from transitional housing
  - An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in a safe haven, or in an emergency shelter. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for

<sup>16</sup> HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: http://portal.hud.gov/hudportal/documents/huddoc?id=14-12cpdn.pdf

<sup>&</sup>lt;sup>15</sup> HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf

human habitation, a safe haven, or an emergency shelter prior to entry in the transitional housing

Also pursuant to Notice CPD-16-11, HPAC requires that all CoC-funded PSH projects accept referrals only through a single prioritized waiting list, created through the coordinated entry process. PSH Minimum Service Standards

HPAC designates the following as minimum service standards:

- No designated length of stay
- Supportive services must be provided throughout the entire length of stay
- Project participants must enter into a lease, sublease, or occupancy agreement for a term of at least one year, with the agreement automatically renewing upon expiration for a term of at least one month
  - While generally expecting compliance with the terms stated above, HPAC permits PSH project managers to exercise discretion when executing lease, sublease, or occupancy agreements, particularly regarding terminable causes
- Meet the minimum services standards for all project types, as described at the end of this chapter

### **Minimum Services Standards for all Project Types**

Domestic Violence, Dating Violence, Human Trafficking, Sexual Assault, and Stalking Victims

HPAC prohibits all victim service providers from using HMIS. HPAC hopes that these provisions shall protect the safety and maintain the confidentiality of victims.

### **Housing First**

All CoC and ESG-funded projects must use a Housing First approach, which focuses on assisting people experiencing homelessness by securing housing as quickly as possible, and then providing supportive services as needed to promote housing stability and individual well-being. Pursuant to 25 California Code of Regulations 8409 Core Practices, <sup>17</sup> this includes:

- Ensuring low-barrier, easily accessible assistance to all people, including but not limited to people with no income or income history, and people with active substance use or mental health issues
- Helping participants quickly identify and resolve barriers to obtaining and maintaining housing
- Providing linkage to financial assistance for move-in and stabilization costs as well as housing case management
- Seeking to quickly resolve the housing crisis before focusing on other non-housing related services
- Allowing participants to choose the services and housing that meets their needs, within practical limitations, understanding that housing may cost greater than 30% of income and be precarious
- Preventing exits into homelessness whenever possible, even when program rules are violated:

<sup>&</sup>lt;sup>17</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1

- People who pose an imminent risk of harm to themselves or others may be exited to more appropriate assistance, such as a more intensive program or hospital
- Allowing participants currently in emergency shelter or transitional housing to only move to other emergency shelter or transitional housing when:
  - They desire and choose
  - It is more appropriate to meet their health and safety needs (e.g., persons in early recovery; domestic violence survivors; those who need special accommodations)
  - No permanent housing solution (with or without supportive services) is currently available that is a similar or better match for their preferences and needs
- Connecting participants to appropriate support and services available in the community that foster longterm housing stability
- Assisting participants create and update individualized Housing Plans designed to re-house and stabilize participants as quickly as possible
- Ensuring all staff helping to house participants know how to access an array of housing options directly or through HPAC's coordinated entry system to help participants achieve their Housing Plan goals
- Ensuring all staff are aware of and know how to access other community resources that can help participants achieve their Housing Plan goals
- Ensuring all participants and staff are aware that participation in services unrelated to obtaining permanent housing is voluntary

### **HMIS**

All CoC and ESG-funded projects must ensure that data on all persons served and all activities provided are entered into HMIS (or a comparable database if the agency is a domestic violence, dating violence, human trafficking, sexual assault, and stalking victims service provider) pursuant to HUD and local standards.

### **Preventing Involuntary Family Separation**

HPAC prohibits all CoC and ESG-funded projects from denying admission or involuntarily separating a family unless the health and/or well-being of a family member is at immediate risk. Pursuant to HUD, HPAC's defines a family as any group of persons who presents for assistance together and identifies themselves as a family.

### Progressive Engagement and Assistance

Another local priority is implementing progressive engagement and assistance practices. Pursuant to 25 California Code of Regulations 8409 Core Practices, <sup>18</sup> this includes:

- Offering financial assistance and services in a way that offers a minimum amount of assistance initially
- Adding more assistance over time if needed to quickly resolve a housing crisis by either ending homelessness or avoiding an immediate return to literal homelessness

<sup>&</sup>lt;sup>18</sup> California Department of Housing and Community Development (HCD) Core Practices (25 CCR 8409 Core Practices) for Emergency Solutions Grants Program:

https://govt.westlaw.com/calregs/Document/I53153D4C91CC4E299A97467973BF1606? viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1

0	The type, duration, and amount of assistance offered shall be based on an individual assessment of the household, and the availability of other resources or support systems to resolve their housing crisis and stabilize them in housing

### **Nondiscrimination Provisions**

Pursuant to civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II and III of the Americans with Disabilities Act, all CoC and ESG-funded project implementation must comply with federal nondiscrimination provisions. This includes Attorney General Order No. 2353-2001, 66 Fed. Reg. 3616<sup>19</sup>, which states that agencies should not withhold certain services based on immigration status when the services are necessary to protect life and/or safety.

.

<sup>&</sup>lt;sup>19</sup> U.S. Department of Justice, U.S. Department of Health and Human Services, and U.S. Department of Housing and Urban Development Joint Letter Regarding Immigration Access to Housing and Services: https://www.hudexchange.info/resources/documents/HUD-HHS-DOJ-Letter-Regarding-Immigrant-Access-to-Housing-and-Services.pdf