

Salt Lake County Continuum of Care Policies and Procedures

This document outlines key operational components of the CoC, including policies and procedures for the CoC and acts as the Salt Lake County Continuum of Care Governance Charter

Version Updates		
Date of Update	Date Approved	Changes Made
June 2013		Initial draft of CoC Policies and Procedures
December 2013		Added prioritization process
January 2014	January 16, 2014 SLCHCC meeting of full membership	Updated coordinated access, Monitoring Policies, Administering Assistance, Board Selection
August 2018	August 16, 2018 SLCHCC meeting of full membership	Updated RRH policies
September 2018	September 6, 2018 SLCHCC meeting of full membership	Added approved RRH policies, deleted Tooele, and cleaned up formatting.

Salt Lake County Continuum of Care Policies and Procedures

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Policy and Procedure Maintenance: This will be considered a living document subject to change. Changes to this document will be made in response to changing conditions and regulations and the will of the membership. Changes will be presented at the Salt Lake County Homeless Coordinating Council meeting time allowed, and adopted at the following meeting. In cases where time does not permit, the Executive Committee may approve changes.

Introduction and Purpose

This document outlines key operational components of the CoC, including policies and procedures for the CoC. Salt Lake County serves as the Collaborative Applicant for the Continuum of Care in partnership with the Salt Lake County Homeless Coordinating Council, Inc.

Background

A Continuum of Care (CoC) is a collaborative funding and planning approach that helps communities plan for and provide, as necessary, a full range of emergency, transitional, and permanent housing and other service resources to address the various needs of homeless persons. HUD also refers to the group of service providers involved in the decision making processes as the "Continuum of Care". Funding comes through the Federal Department of Housing and Urban Development (HUD). In Salt Lake County, the CoC operates under the direction of the Salt Lake County Homeless Coordinating Committee (SLCHCC).

The CoC is responsible for recommending organizations and projects to receive federal funding. Also, the CoC is required to have projects selected and prioritized by a Prioritization Committee which is a subcommittee of the CoC. The Prioritization committee determines in which order projects submitted by local service organizations will be presented to HUD for funding consideration.

Continuum of Care funding is intended to reduce incidents of homelessness in CoC communities, by assisting homeless individuals and families in quickly transitioning to self-sufficiency and permanent housing.

Mission and Vision

MISSION

The mission of the CoC is to develop and implement community- wide strategies and solutions to prevent and end homelessness. This is done by:

1. Increasing public awareness,
2. Advocating for homeless people,
3. Coordinating services,
4. Educating public, community providers, elected officials, and policy makers regarding homelessness and solutions
5. Identifying gaps using PIT and HIC data
6. Targeting resources and implementing best practices
7. Supporting and collaborating on grant applications

VISION

The vision for the CoC is that all individuals and families facing homelessness will have access to safe, decent, affordable housing and the resources and support needed to maintain their housing.

Service Area

The service area for the Continuum of Care is comprised of the entirety of Salt Lake County. The Continuum works closely with leaders and providers in Utah's other continua to ensure that all homeless persons in need have access to services needed to end homelessness.

Communication

Between CoC meetings, the leadership and staff of the CoC will keep members involved using some or all of the following methods:

Maintaining a directory of CoC members, as well as updating and distributing it regularly

Establishing working groups to move the work of the CoC forward between meetings

Encouraging partners with similar interests to join forces, either by sharing information/best practices or working on strategies to collaborate and support each other's efforts

Sharing information regularly to maintain a focus on ending homelessness-

Methods of sharing information between CoC meetings will include:

- Information sent out via email
- Information added to the CoC website (www.utahcontinuum.org), including:
 - Information on the work of the Continuum
 - Resources
 - Plans and Implementation
 - Research and data
 - Funding availability, grant application and awards
 - Written agendas and minutes from meetings
 - Policies

Grievance

Pre-Complaint Process: Ideally, disputes and problems should be resolved between parties on a one-to-one basis. The issues should be clearly stated and understood by both parties. If this process does not resolve the matter, the aggrieved party may seek resolution through the process outlined below, which can lead to binding arbitration or alternative means such as mediation or facilitation.

Formal Complaint Process

Member notifies his/her immediate supervisor/ Executive Director to discuss complaint, put complaint in writing, and discusses possible solutions.	If dispute is not resolved, then...	Supervisor/Executive Director discusses matter with SLCHCC Chair who replies in writing to member's complaint within 10 working days.
Member appeals to SLCHCC Chair within five working days. SLCHCC Chair must meet with parties within five working days of receiving appeal.	If dispute is not resolved, then...	SLCHCC Chair will discuss grievance with parties and within five working days, make a decision on the grievance and take any necessary action.
If decision is unfavorable to member, then member may submit to binding arbitration before an independent and qualified arbitrator.	If dispute is not resolved, then...	Arbitrator will make decision within a timeframe to be determined. Arbitrator will determine how the costs of arbitration are to be divided.

Code of Conduct/Conflict of Interest

Originally Adopted May 11, 2006

The Salt Lake County Homeless Coordinating Council ~~we~~ is responsible to its stakeholders that include affiliates, board members, donors, and others who have placed faith in our mission, support our goals, and work on behalf of and with people who are experiencing homelessness in Salt Lake County.

To uphold this trust we will:

- Promote good stewardship of the Council resources;
- Refrain from using organizational resources for non-Council purposes;
- Observe and comply with all laws and regulations affecting the Council, staff, officers and board members;
- Ensure open and transparent reporting and fiscal accountability;

We will disclose fully the state of our organization, recognizing that power comes from a healthy evaluation of both our strengths and weaknesses, and uphold the highest standards of accountability.

A copy of the Code of Conduct will be distributed to all members of the Council and available upon request to others upon request. The Code will be reviewed periodically by the Council membership.

Conflict of Interest

At the Council we will avoid any conflict of interest or appearance of a conflict of interest.

We will avoid any activity with vendors, grantees, or others that would compromise decisions or the ability to effectively carry out the duties for which we are responsible or that would conflict with the best interest of the Council.

All gifts, favors, fees, or honoraria will be declared except for promotional items or items of nominal value.

We will avoid influencing the selection of staff, consultants and vendors solely on the basis of a personal relationship.

Violation of standards by officers, employees or agents of The Council may result in disciplinary action up to and including termination or removal from the Council's Executive Committee.

Nondiscrimination

The Continuum of Care is a non-discriminatory organization and does not discriminate on the basis of age, sex, gender identity/expression, race, ethnicity, religion, creed, disability, sexual orientation, familial status, military status, homeless status, or national origin in accordance with all state and federal regulations.

Board Selection

The Executive Committee (which shall act as the Board of Directors) shall consist of no less than three voting directors. In addition, the chair and co-chair of the Continuum of Care Committee and the Homeless Services Coordinator for Salt Lake County, shall automatically be ex-officio members of the Board of Directors. As members resign, the Board of Directors will appoint an interim member to the position until the next annual member meeting is conducted and a formal vote and approval process can take place.

This process will be reviewed, updated, and approved by the Continuum annually with the approval of the CoC Policies and Procedures.

Board Terms

Board of Directors is elected to two-year terms by a simple majority of the voting membership. Each director shall hold office until her/his successor is duly elected or recognized. Directors may serve a maximum of three (3) successive terms. For the Chair-elect, this means that service is limited to the two years as Chair-elect, two year as Chair, and two years as past Chair member of the Board of Directors.

In the case of the absence or disability of any director of the executive committee and of any person hereby authorized to act in his place during his absence or disability, the Board of Directors may by resolution delegate the powers and duties of such director, to any other director, or to any other person whom it may select.

Committees

A Continuum of Care Grantee Workgroup subcommittee will be established to provide oversight for the HUD NOFA process. This committee will consist of voting representatives of member agencies who work closely within the Continuum of Care process and are recipients of the funding. The committee will have the responsibility of preparing an annual inventory of services and determining gaps based upon the point in time street counts and Homeless Management Information System (HMIS). This information will be given to the Prioritization Committee to be used in determining ranking order of new proposal and renewals. The committee will have an appointed Chair and Co-Chair under the directions of the Board of Directors. Additional details can be found in the Salt Lake County Continuum of Care Governance Charter.

Educational Assurances

Originally adopted June 16, 2011

Purpose: The purpose of this document is to outline the intent of the Salt Lake County Continuum of Care to meet the educational needs of the homeless youth and families that they serve. The Continuum believes that success in education can lead to positive outcomes and the avoidance of negative behaviors such as drug and/or alcohol abuse or other high risk behaviors. Success in school enhances social growth and has positive physical, emotional and mental outcomes.

The Salt Lake County CoC is committed to ensuring that the educational needs of homeless youth and their families are met.

Pursuant to McKinney- Vento Homeless Assistance Act a homeless child is defined as a child who does not have a fixed, regular, and adequate nighttime residence or whose primary nighttime location is in a public or private shelter designated to provide temporary living accommodations, or a place not designed for, or ordinarily used as regular sleeping accommodations for human beings.

This definition includes a child who is:

- sharing the housing of other persons due to loss of housing, economic hardship or similar reason (sometimes referred to as double-up);
- living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations;
- living in a car, park, public space, abandoned building, substandard housing, bus or train stations or similar settings;
- abandoned in hospitals;
- awaiting foster care placement; or
- a migratory child who qualifies as homeless because he or she is living in circumstances described above
- an unaccompanied youth is a homeless child not in the physical custody of a parent or guardian who is in a living situation described above.

CoC Responsibilities

The CoC will collaborate with local education agencies (schools, districts, etc.) to:

- Assist in the identification of homeless families;
- Inform homeless families and youth of their eligibility for McKinney-Vento education services;
- Encourage providers within the Continuum to develop procedures to meet the educational needs of children when families are placed in emergency or transitional shelter;
- Encourage providers to place families with children as close to possible to their school of origin, as appropriate, so as not to disrupt the children's education;

The CoC will continue to invite McKinney-Vento school Liaisons to attend Continuum of Care and other community planning meetings. This will facilitate dialogue about the services provided by shelters and housing providers, as well as those provided through the school districts.

Provider Responsibilities

Providers within the CoC that serve children/youth will be encouraged to adopt the following practices for serving homeless students.

- Providers should educate all relevant staff on the rights of homeless students as outlined in McKinney-Vento legislation.
- Providers should annually provide information to school principals, counselors, and McKinney-Vento liaisons about services the agency provides.
- Providers should connect regularly with McKinney-Vento liaisons in surrounding school districts.
- Providers should develop policies and practices that are consistent with, and do not restrict the exercise of rights provided by the education subtitle of the McKinney-Vento Act, and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness.

- Providers should designate a staff person to ensure that children are enrolled in school and connected to the appropriate services within the community, including early childhood programs such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney-Vento education services.
- Providers should communicate with McKinney-Vento liaisons to obtain information on children's school performance including:
 - Report cards
 - Attendance reports
 - Behavioral progress reports
 - Awards and / accommodations
- Providers should encourage parental involvement and educate parents on the importance of involvement in their children's education, including:
 - Connecting parents with the local school liaison.
 - Informing parents on homeless children's rights
 - Attending parent/teacher conferences
 - Report cards
 - School attendance
 - Scheduling appointments to minimize children missing time in school
 - Communication and partnership with schools
 - Notifying school when a child changes schools
 - Providing proper nutrition
- Provider staff should report any children they observe as being late for school to parents and case managers.
- As appropriate for housing type and services provided, provider staff should work directly with the truant officers in instances of truancy.
- Providers should offer after-school programs on site or make referrals to other programs.

School Liaison Responsibilities

School liaisons within the CoC will support agency and Continuum efforts by:

- Ensuring students are registered for school whether that is the last school attended, or the school that is nearest their current living situation.
- Assisting with fee waivers making students eligible for free lunch and reduced or no cost enrollments.
- Providing assistance with transportation if outside of school boundaries.
- Paying for immunizations and other documents needed to register for school.
- Assisting with the procurement of school supplies, clothing and hygiene supplies.
- Facilitate enrollment into tutoring or other after-school programs when available.
- Connecting families and youth to community resources.
- Working with case managers and providers to alleviate concerns regarding the educational needs of students.
- Above all else make certain that all educational needs and rights are met.

Meetings

Generally, a minimum of ten (10) membership meetings will be held each year, on the third Thursday of each month.

Two member meetings per year will be held in conjunction with the Long Range Planning Committee.

All the meetings of the members of the CoC shall be open to the public. Meetings other than member meetings, including meetings of the Board of Directors, are not open to the public.

The Board of Directors may call special member meetings by providing an agenda to all the members at least seven days prior to such meeting.

A quorum of the membership shall exist if a majority of the total members are present in person or electronically.

The Board Chair or her/his designees shall take reasonable steps to insure that all members are notified of the time and place of all member meetings.

A reasonable period of time shall be set aside for members to address the executive committee at the member meetings.

All members shall be permitted to propose "new business" for the next membership meeting.

The annual membership meeting of the CoC shall be set by the Board of Directors who shall also set the time and location of the meeting.

It is recommended that one annual half-day strategic planning session be held in the fall each year.

All procedural matters for member meetings not governed by these bylaws, shall follow the provisions of Robert's Rules of Order.

The Corporation may, by a vote of the majority of the members present at a meeting, suspend any provision of Robert's Rules, at any time, whether or not suspension is on the agenda.

Motions at member meetings can only be made by voting representatives.

Membership

Membership in the Salt Lake County Homeless Coordinating Council is open to agencies or organizations within Salt Lake County that provide or facilitate homeless services. Each agency or organization will have only one voting representative and one alternate voting representative at any given time. These individuals will also serve as the official contact persons for the agency or organization that she/herepresents.

Prospective members may attend meetings as non-voting members before they are nominated.

New member agencies or organizations must be approved by a simple majority vote of the current membership.

Once membership of the agency or organization has been approved and paid dues, a representative and alternate representative will be designated by the agency or organization as voting representatives.

The Secretary/Treasurer will maintain an official list of member agencies or organizations and their designated representatives and alternate representatives.

Annual membership fees will be determined by the annual budget of the agency. The fees will be listed on the membership application form.

Annual Membership fee may be waived in special circumstance at the discretion of the Board of Directors.

Membership dues shall be paid in December of each year and will be for the following calendar year. New members will pay the full amount of annual dues upon acceptance into membership. If new members join after August, dues will be credited to the upcoming year.

Point-in-Time Count

The Salt Lake County CoC conducts at least one point-in-time count of homeless persons per year. This count collects data on where homeless households are sleeping, household size, disability, and chronicity of homelessness.

The U.S. Department of Housing and Urban Development (HUD) requires that all states receiving federally-funded homeless services funding conduct a count of all sheltered people in the last week of January annually. Additionally, HUD requires a biannual count of all unsheltered people in states receiving federal funding for homeless services. Electronic administrative records are used to enumerate people living in emergency shelters and transitional housing. Unsheltered counts are required every other year, although Salt Lake County Continuum of Care will conduct an unsheltered count annually. The PIT count is a physical count or census of all homeless persons living in emergency shelters, transitional housing, and on the streets on a single night. It does not capture those who experience only brief episodes of homelessness or account for changes throughout the year due to economic and social forces and therefore estimates are generated to estimate the total number of persons experiencing homelessness in a given year, called an "Annualized Count".

Utah has a single HMIS that collects information on homeless persons served, such as their characteristics and circumstances and the services they receive. The Utah HMIS covers around 80% of homeless service providers statewide.

Housing Inventory Chart

Every year the CoC will collect data to complete a housing inventory. This inventory will occur at a single point-in-time in the last ten days in January. The date of the housing inventory will be the same date as the point-in-time sheltered and unsheltered count.

For each program that houses persons experiencing homelessness, the CoC will collect data on:

- The number of beds and units currently serving individuals and families
- The number of beds and units created in the past year ("new inventory")
- The number of beds and units that are fully funded but not yet serving homeless people ("under development")

Housing inventory data must be obtained from all emergency shelters, transitional housing, and permanent supportive housing programs in the CoC, including those programs that do not receive HUD funding. Data collected from permanent supportive housing programs will be focused only on the beds and units that are dedicated to housing persons who are formerly homeless. The number of vacant emergency shelter, transitional housing, and permanent supportive housing units must be collected for the unmet need determination.

To collect Housing Inventory data, the CoC will annually:

- Use HMIS data to complete the Housing Inventory Chart OR
- Conduct a housing inventory survey (via mail, fax, e-mail, web-based, phone or on-site) of homeless providers, which will include the previous year's Housing Inventory Chart and instruct providers to review and update housing inventory information on the specified night of the housing inventory. If the CoC decides to collect housing inventory information via a survey, the CoC will:
 - Provide written instructions to all homeless providers on how to report an accurate bed inventory
 - Systematically train provider-level staff on how to obtain an accurate bed inventory
 - Include definitions of key terms used in the inventory chart
 - Follow-up with providers (e.g., via telephone, email, or in-person) to ensure the maximum possible response rate and accuracy of the housing inventory information
 - After receiving the inventory information, confirm the information with each provider to verify the accuracy of the data

Unmet need

Annually, the CoC reviews the data collected as a result of the homeless counts and housing/services inventories, and determine what housing and services are needed given the homeless populations. The methods to undertake this review include:

- Determining Housing Needs
- Calculating Unmet Needs
- Prioritizing Gaps

Each year the CoC reports to HUD what housing for homeless people we need in our community, including the need of families and individuals for Emergency Shelter beds, Transitional Housing beds, Rapid Rehousing and Permanent Supportive Housing beds. This information is also necessary for the long-term program and strategic planning that we do as a community. HUD's standardized methodology for calculating unmet need uses point-in-time data and local provider expertise to calculate an initial estimate of unmet need. Because the estimates from the standardized methodology may not reflect all that is known about the homeless population in our community, the CoC will also convene key community stakeholders to discuss the initial estimates and determine if adjustments are necessary to reflect other local information.

Determining Housing Needs

Unmet need reflects the difference between a CoC's bed capacity and the number of homeless persons in the CoC at one point-in-time. Thus, most information for the unmet need calculation is collected as part of the point-

in-time homeless count and housing inventory process, except the housing needs of the community. To determine the housing needs of homeless persons who are residing in emergency shelter, transitional housing, and persons who are unsheltered, the CoC will gather expert opinions of homeless assistance providers.

The CoC will obtain the housing needs of sheltered homeless persons by asking each emergency shelter and transitional housing provider listed in the Housing Inventory Charts to estimate the percentage of their clients that need emergency shelter, transitional housing, and permanent housing to ultimately resolve their homeless situation.

The CoC will obtain the housing needs of unsheltered homeless persons in one of two ways:

Individually surveying outreach workers or teams, then averaging the estimated percentages, and applying the average to the total unsheltered population; or

Convening a group of outreach workers to discuss and arrive at a consensus on the percentage of unsheltered persons in need of each type of housing

When determining housing needs, the CoC will remember that:

- Each person or family should be placed in the one program type that will best assist the household in resolving homelessness
- The calculation of unmet need for each program type (emergency shelter, transitional housing, rapid rehousing, or permanent supportive housing) should be done separately for unaccompanied individuals and persons in families with children; this is necessary to accurately reflect the bed capacity needs for each group.

Calculating Unmet Need

The CoC will begin by using the following standardized formulas for calculating unmet need by program type (emergency shelter, transitional housing, and permanent supportive housing):

Unmet need for Emergency Shelter (ES) = (The number of unsheltered homeless persons who need ES + the number of persons currently in ES who will only need ES) - (Total number of ES beds + ES beds under development)

Unmet need for Transitional Housing (TH) = (The number of unsheltered homeless persons who need TH + the number of persons in ES who need TH + the number of persons in TH who will only need TH) - (Total number of TH beds + TH beds under development)

Unmet need for Rapid Rehousing (RRH) = (The number of unsheltered homeless persons who need RRH + the number of persons in ES who need RRH + the number of persons in TH who need RRH) - (Total number of vacant RRH beds + RRH beds under development)

Unmet need for Permanent Supportive Housing (PSH) = (The number of unsheltered homeless persons who need PSH + the number of persons in ES who need PSH + the number of persons in TH who need PSH) - (Total number of vacant PSH beds + PSH beds under development).

AHAR Participation

The Annual Homeless Assessment Report (AHAR) is a report by HUD to the U.S. Congress on the extent and nature of homelessness in America. It is based on data from Homeless Management Information Systems and on information from Continuum of Care (CoC) Collaborative Application. The AHAR provides estimates of the number of homeless persons nationally, a descriptive profile of homeless persons, and an analysis of service use patterns.

The HMIS team for the CoC is responsible for completing the AHAR. Client level data for the AHAR will be collected through the Homeless Management Information System (HMIS) based on HUD's universal data elements which all communities receiving HUD Homeless Assistance funding are required to collect and maintain and which are the same data elements used to generate HUD's Annual Performance Reports (APRs).

Unduplicated data will be collected for the four standard AHAR reporting categories: Emergency Shelter-Individuals, Emergency Shelter-Families, Transitional Housing-Individuals and Transitional Housing-Families. Data will also be collected for any supplemental reporting categories established by HUD.

In order to participate in the AHAR, the CoC's HMIS must be capable of:

- Producing a one day point-in-time count, average day count, and longitudinal counts.
- Identifying clients with multiple program use—e.g., how many people in ES-IND were also served in TH-IND.
- Counting persons by household type—e.g., individual adult male, adult in household with children, or unaccompanied youth.
- Generating frequencies by basic demographic characteristics.
- Cross-tabulating total length of stays within each program-household type, by gender and age.
- Totaling the number of households with children by program type.

UHMIS has established continuum-wide data quality control procedures to ensure the accuracy and completeness of AHAR data collected and reported. On an annual basis (according to HUD's designated data collection schedule), UHMIS will de-duplicate and aggregate the client information collected to produce and submit the AHAR data report.

- The AHAR data collection period is October 1st to September 30th of each year.
- UHMIS will submit the AHAR report electronically through the AHAR Exchange to the HUD-designated private research firm, responsible for compiling the national AHAR.
- A draft AHAR report will be submitted by the HUD-designated date.
- UHMIS will work with the AHAR Research team to correct any data problems, and submit a final AHAR report by the HUD-designated date.
- Salt Lake County Continuum of Care is geographically defined as Salt Lake County.
- Salt Lake County has been operating under a coordinated system of entry for decades. Largely in part due to the fact that we have one large emergency shelter, rather than many small ones across the county. With the implementation of a statewide HMIS system in 2007, most homeless service providers began using common intake and assessment tools.

Coordinated Entry

Coordinated Entry Written Standards were approved in a separate document in January 2018 and may be found at our website here:

https://slco.org/uploadedFiles/depot/frd/homeless_services/SLC%20CES%20Standards%20Jan%202018.pdf

Prevention and Diversion

With HPRP funding, the three funders (Salt Lake City, Salt Lake County and The State of Utah) collaborated in their funding award decisions and awarded funding to a single agency for prevention (Utah Community Action or UCA). UCA was an established agency in Salt Lake City that had been the primary source for prevention services in Salt Lake County, including rental assistance, landlord mediation and eviction avoidance. UCA participates in HMIS and utilizes the common intake and assessments for all UHMIS participants.

If the consumer is deemed an appropriate candidate for prevention funds, a referral will be made to UCA through their online application process.

Outreach and Marketing Plan

It is essential that those affected most immediately and significantly by this new model, the consumers, are provided with clear, consistent, and consumable information not only through sources of direct outreach, but by each provider with whom they interface. As a decentralized system, all agencies within the CoC bear the responsibility for ensuring effective outreach and marketing communications. Homeless assistance providers, and others with whom those experiencing homelessness regularly interact, are engaged in the consistent dissemination of information through the following methods:

Print Media: Fliers, Homeless Provider Newsletters/Publications, Department of Health and Human Services publications, Local Newspapers

Online Resources: Homeless Provider web pages, DWS, State of Utah website, 2-1-1 website

Word of Mouth: Outreach workers, drop-in center staff, other Homeless Provider staff, Consumers\

Priorities

Salt Lake County Homeless Service Priorities developed from a survey conducted in 2012.

For Non-Chronically Homeless

Families with dependent children receiving Permanent Housing with appropriate supportive services.

For Chronically Homeless

Single Adults receiving Permanent Supportive Housing

Other Subpopulation Priorities

Mentally Ill

Chronic Substance Abuse

Youth

Overall Service Priorities

Case Management

Employment

Mental Illness Treatment

Life Skills Services

Substance Abuse Treatment

Continue the work to house the Chronically Homeless, but as that population is successfully housed increase services for the Non-Chronically Homeless

Other Priorities

Focus on Rapid Rehousing and Permanent Supportive Housing more than supportive services.

Continued utilization of HMIS

Support of Centralized Intake Process

Prevention

HMIS

The State of Utah Homeless Management Information System (UHMIS) is a collaborative project of three Continuum of Care within the State of Utah, namely Salt Lake County, Balance of State, and Mountainlands and the State Community Service Office (SCSO), Housing and Community Development Division of the State of Utah Department of Workforce Services (DWS), and participating Partner Agencies. HMIS is a computerized data collection application designed to capture information about homeless people and homeless programs over time. HMIS is mandated by the U.S. Department of Housing and Urban Development (HUD) under the HEARTH Act for all communities and agencies receiving HUD Continuum of Care (CoC) and Emergency Solutions Grant (ESG) homeless assistance funds. HMIS is essential to efforts to streamline client services and inform public policy. Through HMIS, homeless people benefit from improved coordination in and between agencies, informed advocacy efforts, and policies that result in targeted services. Analysis of information gathered through HMIS is critical to the preparation of a periodic accounting of homelessness in the State of Utah and each Continuum, which may include measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs. Such an unduplicated accounting of homelessness is necessary to service and systems planning, effective resource allocation, and advocacy. The parties to this Memorandum of Understanding (MOU) share a common interest in collaborating to end homelessness and successfully implementing and operating HMIS in the State of Utah.

The Salt Lake County Continuum of Care goal is to collaboratively provide a range of homeless housing and services. The continuum of care system components includes prevention, emergency shelter, transitional housing, rapid rehousing and permanent supportive housing. Outreach efforts and specialized supportive services, actively identify and support homeless individuals and families and work with them to access mainstream resources. HMIS will enable homeless service providers to collect uniform client information over time. Analysis of information gathered through HMIS is critical to accurately calculate the size, characteristics, and needs of the homeless population; these data are necessary to service and systems planning, and advocacy.

Governance

The State of Utah CoC's are the lead planning groups of the HUD funded efforts to end homelessness and for implementing and operating a homeless system within their jurisdictions. A Memorandum of Understanding outlines in detail the expectations for each of the three continua and the State of Utah. Per HUD policy the CoC's are responsible for HMIS project oversight and implementation, which encompasses

- planning,
- administration,
- HMIS budget approval and oversight,
- grant monitoring and work plan submission approval,
- software selection,
- managing of HMIS data compliance with HMIS data standards,
- reviewing and approving all policies, procedures and data management plans contributing to HMIS Organizations

The CoC's oversight and governance responsibilities are carried out by its Steering Committee. The general decision making process is as follows:

Draft policies, procedures, data management plans and other work will be reviewed, amended, and preliminarily approved by the Steering Committee.

The CoC representatives on the Steering Committee are responsible to share draft policies, procedures, data management plans and other work with their perspective CoCs for CoC feedback and approval.

The Steering Committee may give final approval of policies, procedures, data management plans and other work after receiving feedback and approval from each of the three CoCs.

No policy, procedure, data management plan or other work may be approved by the Steering Committee without confirmation and approval by all three CoCs.

Steering Committee & Information Committee

The State HMIS Steering Committee is made up of representation of all three CoC's for the State of Utah as well as ESG representation, local leaders, and the Lead Agency HMIS staff. The role and responsibility of the Steering Committee is defined in the Governance in section C.1.

The role and responsibility of the Information Committee is to provide analysis of trends and performance of the homeless system and detailed HMIS data reports as requested by each CoC objective. This Committee will inform the Steering Committee and the SLHCC of homeless data which may be collected outside of the HMIS system.

Lead Agency Designation

The three CoC's designate the Homelessness Programs Office, Housing and Community Development Division of the State of Utah Department of Workforce Services (DWS) to manage the HMIS operations on its behalf and to provide HMIS project administration functions including staffing with State employees and managing budget and grant requirements.

Continuum of Care Application in response to HUD NOFA

The CoC Collaborative Applicant is responsible for facilitating the community response to the annual Continuum of Care (CoC) Notice of Funding Availability (NOFA) issued by the federal department of Housing and Urban Development (HUD). The CoC workgroup are charged with guiding our CoC's response to the NOFA.

Rank and Review Policies and Procedures

Updates Drafted 8/23/2018

Eligible proposals will be prioritized for inclusion in the CoC's coordinated application by the Ranking Committee acting as the rank and review group. Applications not scoring high enough will not be placed on the project funding request as part of the Consolidated Application (Formerly Exhibit 1).

Salt Lake County, as the designated Collaborative Applicant, recruits Ranking Committee members, prioritizing members who have served as members in the past or who have other relevant experience. The Ranking Committee will be composed of representatives from a cross-section of groups which might include: Faith-based and non-profit providers of homeless services and housing; city representatives; county employees; mental health; substance abuse; veteran's services; and consumers.

- Ranking Committee members must declare that they have no conflict of interest.
- Members must be appointed every year and their eligibility verified.
- Members must be able to dedicate time for application review and committee meetings.
- Ranking Committee members are given an orientation which includes:
 - Information regarding homeless activities, needs, services, definitions and other issues that are pertinent to the CoC
 - A background of McKinney Vento and the local process
 - The role of the Ranking Committee
 - Review of the scoring tools, applications, and resources

Ranking Committee members receive eligible application proposals and scoring matrix.

Prior to the Ranking meeting, all Ranking Committee members review all applications over an appointed period. Members read projects, preliminarily score them, and note any questions/comments to follow-up with applicants.

If the CoC staff have any knowledge that could lead HUD to deny granting funds to a project, they will share that information with the Ranking Committee. CoC staff will discuss this information with applicants as part of technical assistance provided to assist project development.

The Ranking Committee meets to review and discuss each application together and to individually score them. CoC staff is present at the Committee meeting to record decisions of the Committee and any comments/recommendations they have for applicants.

The Ranking Committee discusses the merits of each proposal, scores the applications, and turns in score sheets to staff.

- Overall raw scores are calculated by CoC Staff.
- The Committee considers adjustments for such issues HUD incentives or requirements.
- The Committee considers proposal changes or project budget adjustments that may be required to meet community needs.
- The Committee determines the rank and funding levels of all projects considering all available information.
- During deliberation, CoC staff will provide technical assistance by responding to questions of the Committee members, correcting technical inaccuracies if they arise in conversation, and reminding the

Committee members of their responsibilities if they step outside their purview.

- Scoring results are delivered to applicants with a reminder about the appellate process.
- Each applicant receives copies of their proposals with technical edits made by CoC staff. Applicants are asked to correct their applications and send them back to CoC staff before final submission to HUD.
- Applications which do not meet the threshold requirements will not be included in the Priority Listing as part of the Consolidated Application, and therefore will not be forwarded to HUD for consideration.
- If more applications are submitted than the CoC has money to fund, the lowest-scoring applications will not be included in the Priority List as part of the Consolidated Application, and therefore will not be forwarded to HUD for consideration.

Penalties

Applicants may correct a curable deficiency with timely action. To be curable the deficiency must: not be an applicant eligibility requirement and be remedied within the time frame specified in the notice of deficiency.

If the corrections are remedied within the time frame specified, no loss of points will result.

If the Committee finds that an applicant has intentionally misrepresented information, the application may be rejected, or a penalty may be assessed.

Where there is a staff (SLCO or HUD) documented issue that impacts the ability of applicants to access electronic application systems (E-snaps, ZoomGrants), the Committee reserves the right to adjust the penalty submission deadline accordingly.

Policy for Appeals of Rating/Ranking

Eligible Appeals:

- The application of any applicant agency which a) is unranked, or b) receives decreased funding may appeal.
- Applicants that have been found not to meet the threshold requirements are not eligible for an appeal.
- Appeals cannot be based upon the judgment of the Ranking Committee.
- Applicants may appeal if they can:
 - prove their score is not reflective of the application information provided; or
 - describe bias or unfairness in the process, which warrants the appeal.

All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered. Omissions to the application cannot be appealed.

Per 24 CFR 578.35(b), project applicants that believe they were not allowed to participate in a fair and open process and that were rejected by the CoC may appeal the rejection directly to HUD by submitting as a Solo Application prior to the application deadline. Additional appeal information may be found in the Notice of Funding Availability (NOFA).

Annual Performance Report

Annual Performance Reports (APRs), formerly called Annual Progress Reports, are required by HUD on an annual basis to track the progress and accomplishments of HUD's Continuum of Care Homeless Assistance Programs.

The APR gathers information on how programs assist homeless persons to obtain and remain in permanent housing, increase skills and income, and attain greater self-determination. This information is used by HUD and Congress to assess outcomes from federal funding. The APR is also useful to the CoC, grantees, and sponsors as a planning and management tool to analyze client demographics and service needs; to evaluate project outcomes; to make improvements; and to set future goals for their projects.

To ensure accurate reporting and local accountability, it is the policy of the Salt Lake County CoC that agencies are to submit a pdf draft copy of their eSnaps submission to the HMIS designated staff person 60 days before the APR is due to HUD. Following that review, agencies are to submit a draft copy to the CoC designated staff person, no later than 30 days before the APR is due to HUD. Once the HMIS staff and CoC staff have reviewed the reports and any corrections have been incorporated, the agency may then submit their APR to HUD.

Monitoring

CoC Staff and leadership shall make an annual visit to CoC funded projects. In order to avoid conflicts of interest, the leadership member conducting the visit shall not be a staff member of any agency participating in the project.

The Site/Monitoring Visit will consist of the following activities/components:

1. Tour units/facility, if applicable. Site/unit visits are conducted to evaluate the physical adequacy of the housing provided.
2. Review and discuss most recently submitted APR, including goals and progress.
3. Review random sample of program files: Comprehensive file review will be completed on at least one file, with other files reviewed if necessary.
4. Review results of client satisfaction survey and/or conduct client interviews. Arrangements for client interview will be made in advance of the visit.
5. Identify technical assistance needs (from Continuum of Care or other source).

After the site/monitoring visit, a written summary of the visit will be provided to the grantee. The grantee will then have fourteen (14) days to respond in writing to the visit summary report.

The Executive Committee will review the summary and any written responses from the grantee.

If, based on project performance and the grantee's written explanation, the Executive Committee has no further response or performance recommendations, the Site/Monitoring Visit Summary and the grantee's written response(s) will be presented to the Prioritization Committee on an informational basis.

If, based on project performance and the grantee's written explanation, the Executive Committee has continued performance concerns, the Executive Committee will draft recommendations to address identified concerns, which will be presented to the Prioritization Committee. The Executive Committee's recommendations to the Prioritization Committee will be accompanied by the Site/Monitoring Visit Summary and the grantee's written response(s). All recommendations approved by the Prioritization Committee will be signed by the Prioritization Committee Chair and provided in writing to the grantee. Timelines for corrections and follow-up visits are anticipated to be sixty (60) days or less, but will be defined on a case-by-case basis in the approved recommendations.

The process of Follow-up Visits, summaries, and reports to the Prioritization Committee will follow the same the process as the initial Site/Monitoring Visit. However, Follow-up Visits will specifically address grantee's fulfillment of the recommendations of the Prioritization Committee.

In addition to an annual Site Visit, the Executive Committee may conduct desk monitoring reviews of agency audits, drawdown requests, APRs and other documentation as necessary for the prioritization process and response to the NOFA.

ESG Recipient Monitoring

The Continuum of Care will work with ESG funders at the State, City and County level to coordinate the monitoring of outcomes of recipients of ESG funding. Grantee activities will be monitored to assure compliance with applicable Federal requirements and to determine whether or not performance goals are being achieved. The Continuum of Care will work with the State, City and County ESG funders to develop the performance standards and evaluate outcomes of ESG-funded projects.

Fiscal Year

The fiscal year of the Corporation shall be the calendar year, or as otherwise determined and set by the Board of Directors.

CoC and ESG Rapid Re-housing Assistance

Updates Approved by CoC Membership on August 16, 2018

Originally adopted from policies created by Salt Lake County related to the administration of the Emergency Solutions Grant.

Rapid re-housing assistance aims to help individuals or families who are homeless move as quickly as possible into permanent housing and achieve stability in that housing through a combination of rental assistance and supportive services.

Client Eligibility: Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG and CoC RRH.

A. ELIGIBILITY

1. Individual or household Adjusted Gross Income must be at or below 50% of the Area Median Income (AMI). (ESG Rapid Re-housing participants must fall below or equal to 30% AMI.) AMI limits are available on HUD's web site at: <http://www.huduser.org/DATASETS/il.html>.
2. The household must be either at risk of homelessness (for prevention assistance) or homeless (for rapid re-housing assistance) as defined by HUD. Housing status documentation must be kept in client file.
3. Eligible participants must be willing to enroll in the program, and commit to make efforts to take over full contract rent when the subsidy concludes.

B. ELIGIBILITY DETERMINATION

1. Evaluations: Agencies must provide an initial evaluation to determine the eligibility of each individual or family for ESG and CoC assistance including the amount and types of assistance needed to regain stability in permanent housing. These evaluations must be conducted in accordance with the Continuum of Care centralized or coordinated assessment requirements and the agency Policy and Procedures. Evaluation documentation must be kept in client file. Agencies should have a process in place to refer persons ineligible for ESG and CoC assistance to the appropriate resources or service provider that can assist them.
2. Housing Status: Each household served must be determined to be either at risk of losing housing (ESG Prevention) or homeless (Rapid Re-housing) through a housing status determination process that includes documentation of the household's current living situation.

Homeless – Definition

1. Category 1 – Literal Homeless:
 - a. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - i. has a primary nighttime residence that is a public or private place not meant for human habitation;
 - ii. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); OR
 - iii. 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
2. Category 2 – Imminent Risk of Homelessness:
 - a. Individual or family who will imminently lose their primary nighttime residence, provided that:
 - i. Residence will be lost within 14 days of the date of application for homeless assistance;
 - ii. No subsequent residence has been identified; and
 - iii. The individual or family lacks the resources or support networks needed to obtain other permanent housing
3. Category 3 – Homeless under other Federal statutes:
 - a. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- i. Are defined as homeless under the other listed federal statutes;
 - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
 - iii. Have experienced persistent instability as measured by two moves or more during the preceding 60 days. Can be expected to continue in such status for an extended period of time due to special needs or barriers
- 4. Category 4 – Fleeing/Attempting to Flee Domestic Violence:
 - a. Any individual or family who:
 - i. Is fleeing, or is attempting to flee, domestic violence
 - ii. Has no other residence; and
 - iii. Lacks the resources or support networks to obtain other permanent housing

Note: CoC and ESG dollars can serve Category 1 and Category 4. ESG assistance may not be provided to persons defined as homeless under Category 3. At this time, Category 2 and Category 3 are populations that are unable to be served with CoC RRH dollars.

- C. INCOME DETERMINATION: Each household's Adjusted Gross Income served with financial assistance and/or housing and stabilization services must be determined to be at or below 50% of Area Median Income (AMI) through an income determination process that includes identifying the applicable AMI, documenting income, and calculating household income. (ESG Rapid Re-housing participants must fall below or equal to 30% AMI.)
- D. RE-EVALUATION: Program participant's eligibility and the types and amounts of assistance the program participant needs must be re-evaluated not less than once every 3 months for prevention assistance, and not less than once annually for rapid re-housing assistance. At a minimum each re-evaluation of eligibility must establish that:
 - a. The program participant needs to show progress in establishing income beyond initial AMI eligibility. If this criterion is not met, the case manager must document the extenuating circumstances and obtain a waiver from their supervisor AND
 - b. The program participant lacks sufficient resources and support networks necessary to retain housing without ESG or CoC assistance.
 - c. Each program participant must notify the agency regarding changes in their income or other circumstances (e.g., changes in household composition) that affect the participant's need for ESG or CoC assistance. When notified, agency must re-evaluate the participant's eligibility and amount and types of assistance needed.

Coordination: Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.

- A. Salt Lake County Continuum of Care will consult with Salt Lake County and City to receive input on allocating ESG and CoC funds; developing performance standards and evaluating project outcomes.
- B. Salt Lake County Continuum of Care will coordinate and integrate ESG funded activities, to the maximum extent practicable, with mainstream housing, health, social services, employment, education, and youth programs.
- C. Salt Lake County Continuum of Care ESG and CoC funded programs will participate in the coordinated assessment system.

Prioritizing Services among Eligible Clients: Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

- A. After consulting with CoC and ESG service providers receiving ESG and CoC client assistance funds, Salt Lake County Continuum of Care will identify any client categories that need to receive preference in utilizing limited ESG and CoC assistance. Such preferences are to be used as guidance and not to eliminate any eligible person or households deemed most appropriate by the service provider who has immediate and detailed knowledge of their specific clients' circumstances.

- B. Salt Lake County Continuum of Care preference is to assist both individuals and families with homelessness prevention and rapid re-housing assistance. RAPID REHOUSING: First time homeless individuals and families who can effectively utilize ESG or CoC assistance to prevent a reoccurrence of homelessness. This is to be determined after an assessment by the case manager in consultation with the supervisor.
 - i. The household lacks the financial resources to remain in its existing housing and has an eviction notice from the landlord
 - ii. No appropriate subsequent housing options have been identified.
 - iii. The household lacks support networks necessary to remain in existing housing.
 - iv. Existence of two or more risk factors including but not limited to the following: doubled-up, single-parent, loss of income in the last 90 days, disability, or large family size.
 - v. Potential impact. Would short term assistance make a difference for the client, resulting in a more stable situation in the near term?

Client Cost Sharing: Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.

- A. Individuals and families receiving ESG homelessness prevention and ESG and CoC rapid re-housing assistance may be required to pay up to 30% of their household income toward rent. Participating individuals and families will be required to provide verification of all household income.
- B. Subgrantees have the flexibility to determine the amount of rental assistance provided. Assistance should be “needs-based” providing the minimum amount needed to prevent the program participant from becoming homeless or returning to homelessness in the near future.

Length & Amount of Rental Assistance: Standards for determining how long a program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.

- A. An eligible individual or family may receive up to 24 months of rental assistance during any 3-year period. Short-term rental assistance is for up to 3 months of rent. Medium-term rental assistance is for more than 3 months, but not more than 24 months of rent.
 - a. Flexibility: Subgrantees have the flexibility to determine the amount of rental assistance provided.
 - b. Needs based: Assistance should be “needs-based” providing the minimum amount needed to prevent the program participant from becoming homeless or returning to homelessness in the near future.
 - c. Security and utility expenses: Subgrantees have the discretion to determine how to handle eligible expenses, according to HUD. If the Subgrantee recovers a deposit, it must be treated/reported as program income.
- B. Rental arrears: ESG assistance may include payment of rental arrears consisting of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
- C. Termination of Housing Assistance: The subgrantee may terminate assistance to a program participant who violates program requirements. In terminating assistance to a program participant, the subgrantee must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law. This process, at a minimum, must consist of:
 - a. Written notice to the program participant containing a clear statement of the reasons for termination;
 - b. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
 - c. Prompt written notice of the final decision to the program participant.

Housing Stabilization/Relocation: Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as

the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.

- A. The type of supportive services offered will be determined during an initial assessment of the family and tailored to individual barriers and needs. Eligible families will receive supportive services for the duration of the rental assistance. Such services can also be extended beyond the rental assistance period.
- B. Housing Stabilization and Relocation Services: ESG or CoC funds may be used for services that assist program participants with housing stability and placement. Eligible activities include:
 - a. Case management
 - i. ESG or CoC case management funds may be used for activities for the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of program participants and helping them obtain housing stability.
 - ii. Component services and activities may include:
 - iii. Counseling;
 - iv. Developing, securing, and coordinating services;
 - v. Monitoring and evaluating program participant progress;
 - vi. Assuring that program participants rights are protected;
 - vii. Developing an individualized housing and service plan, including a path to permanent housing stability subsequent to ESG or CoC financial assistance.
 - b. Housing search and placement
 - i. ESG or CoC housing search and placement funds may be used for services or activities to assist individuals or households in locating, obtaining, and retaining suitable rental housing. These may include:
 1. Tenant counseling
 2. Assisting individuals and households to understand leases;
 3. Securing utilities

List of Acronyms

AHAR	Annual Homeless Assessment Report
APR	Annual Performance Report
ARA	Annual Renewal Amount
ARD	Annual Renewal Demand
ARRA	American Recovery and Reinvestment Act
BOS	Balance of State CoC
CAP	Community Action Program
CH	Chronically Homeless
CoC	Continuum of Care
CDBG	Community Development Block Grant
DWS	Department of Workforce Services
DUNS #	Data Universal Numbering System
ESG	Emergency Shelter Grant (Federal)
eSnaps	Online Application and Grants Management System for HUD's Homeless Programs

FMR	Fair Market Rent
FPRN	Final Pro Rata Need
GIW	Grant Inventory Worksheet
HDX	Homeless Data Exchange
HEARTH Act	Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009
HMIS	Homeless Management Information System
HHN	Hold Harmless Need
HPRP	Homeless Prevention Rapid Re-Housing
HUD HRE	HUD Homeless Resource Exchange
HUD	Department of Housing and Urban Development (Federal)
LRP	Long-Range Planning Committee
MtLAND CoC	Mountainlands Continuum of Care
NOFA	Notice of Funding Availability
NSP	Neighborhood Stabilization Program
PH	Permanent Housing
PIT	Point-In-Time (annual count of homeless persons)
PPRN	Preliminary Pro Rata Need
PRA	Project-based rental assistance
PSH	Permanent Supportive Housing
RFP	Request for Proposals
RHASP	Rural Homeless Assistance and Stability Program
SCSO	State Community Services Office
SH	Safe Haven
SHP	Supportive Housing Program
SLCHCC	Salt Lake Homeless Coordinating Council
S+C	Shelter plus Care Program

SRA	Sponsor-based Rental Assistance
SRO	Single Room Occupancy
SSO	Supportive Services Only
TH	Transitional Housing
TRA	Tenant-based Rental Assistance
VASH	Veteran's Affairs Supportive Housing