

**HOMELESS CONTINUUM OF CARE OF STARK COUNTY
BOARD MEETING
Tuesday, March 12, 2019
9:30am at the Community Campus at Goodwill
Meeting Minutes**

Members Present

Danelle Lightner
Lynne Dragomier
Beverly Lewis
Kim Kroh
Captain Gabbard
Shirene Starn Tapyrik
Julie Sparks
JoAnn Breedlove
Marty Chumney
Cathy Jennings
Lisa Warden

SHN

Marcie Bragg
Melissa Terrell

Members Not Present

John Aller
Shannon McMahan Williams
Maria Heege
Cheli Curran
Rollin Seward

Guest

Amy Bullard, ODSA

I. Welcome

At 9:34 a.m., Marcie Bragg, Board Chair, called the meeting to order and welcomed everyone.

Marcie welcomed guest, Amy Bullard from The Ohio Development Services Agency (ODSA), to the Homeless Continuum of Care of Stark County (HCCSC) Board meeting. HCCSC Board members introduced themselves and the agency they represent.

II. Ohio Development Services Agency – Amy Bullard, Supportive Housing Specialist

Amy Bullard introduced herself to the Board members and disclosed some of her professional experiences. Amy became a member of ODSA last August and has a history with non-profit management, grant writing, and administering grants. She has also worked on grants with Habitat for Humanity disaster relief projects.

Lisa Warden and Lynne Dragomier entered the meeting at 9:37am.

III. Approval of February Meeting Minutes

Motion: Marcie requested a motion to approve the Homeless Continuum of Care of Stark County Board meeting minutes for the month of February. Danelle motioned to approved. Beverly seconded the motion, and the motion was carried by a unanimous vote of all members present except Captain Gabbard and Lynne Dragomier, whom abstained. The HCCSC Board members that abstained were not present during the February meeting.

Marcie reminded the Homeless Continuum of Care of Stark County (HCCSC) Board members of the conflict of interest policy and requested that committee members remove themselves from the meeting prior to any agenda items that could pose a conflict. Today’s agenda will discuss the Approval of Recipient Approval and Evaluation Policy Revisions, Approval of FY 2019 CoC Competition Documents, and Approval of FY 2019 Emergency Solutions Grant Allocation.

IV. Approval of Recipient Approval and Evaluation Policy Revisions (See Attachment 1, 2, and 3)

As required by the HCCSC Governance Charter, the Recipient Approval and Evaluation Committee (RAEC) is required to annually review these policies and provide policy amendment recommendations, when necessary, to the HCCSC Board for approval.

a. C.3 Procedures for Inviting and Reviewing Applications for CoC Funding

- i. The revisions to the C.3 policy were discussed with Board members. Some of the revisions in the policy reflected terminology changes throughout the entire document (1) CoC Planner was replaced with Collaborative Applicant (2) Collaborative Applicant and Consolidated Application were used interchangeably and the correct term replaced the interchanged term. Other revisions to this policy included the removal of time frames associated with the Notice Funding of Availability (NOFA); the RAEC may need to review new information that may not meet the original required timeframes. The tracked changes of the policy amendments will be provided by request.

b. C.4 Procedures for Monitoring and Reviewing CoC-Funded Projects

- i. The revisions to the C.4 policy were discussed with Board members. Some of the revisions in the policy reflected terminology change throughout the entire document (1) CoC Planner was replaced with Collaborative Applicant (2) Collaborative Applicant and Consolidated Application were used interchangeably and the correct term replaced the interchanged term. Other revisions to this policy include incorporating language from the HMIS polices that states HMIS Participating Agencies now has the availability to pull Annual Performance Reports from the HMIS system. The tracked changes of the policy amendments will be provided by request.

Discussion:

- a. HCCSC Board members discussed the Quarterly Status Reporting section of this policy. Board member, Shirene Starn-Tapyrik, shared that there are barriers to providing information required in the status reports such as the time needed to correct data in HMIS; additionally, the Board member questioned if a status report submitted after the scheduled date would reflect in a loss of points during the FY2019 CoC Application Competition. The Stark Housing Network Inc. (SHNI) reviews status reports from all CoC funded agencies; the basis for agencies submitting quarterly status reports with cumulative Annual Performance Reports (APR) is to encourage timely data entry into HMIS and to provide assistance to agencies that are not meeting quarterly performance expectations. The SHNI reported that timely communication and proper documentation between the agency and SHNI regarding late status report submission would not reflect a loss of points during the FY2019 CoC Application Competition.
- b. There was discussion around the structure of the Stark Housing Network, Inc. (SHNI) and the SHNI's connection to the HCCSC. The SHNI is the collaborative applicant for the HCCSC and is a non-profit organization. The Stark Housing Network, Inc. is the employer of record for both Marcie Bragg and Melissa Terrell. Marcie agreed to invite the SHNI Board chair, Commissioner Janet Creighton, to a future HCCSC Board meeting to discuss the SHNI's role in the Continuum with HCCSC Board members.

c. C.5 CoC Quarterly Status Report

- i. The revisions to this status report were discussed with Board members. Changes to the form included adding a chart that details the amount of funds being spent by budget line item. The changes made to the report are meant to help projects keep track of funding that has been drawn down and for the SHNI to ensure that projects utilizing CoC funds.

Motion: Marcie requested a motion to approve the Homeless Continuum of Care policies *C.3 Procedures for Inviting and Reviewing Applications for CoC Funding*, *C.4 Procedures for Monitoring and Reviewing CoC-Funded Projects*, and *c. C.5 CoC Quarterly Status Report*. Lynne motioned to approve. JoAnn seconded the motion, and the motion was carried by a unanimous vote of all members present except for Shirene, Marty, Julie, and Cathy whom abstained. The HCCSC Board Members are recipients of Continuum of Care funding and abstained due to the conflict of interest policy.

V. Approval of Coordinated Entry Policy and Form Revisions

a. D.2 Coordinated Entry Guide

- i. There has been an increase in transfer requests over the past several months for the eligible transfer criteria *imminent risk to harm self or others*. The Coordinated Entry Committee (CE) reviewed the transfer policy in D.2 Coordinated Entry Guide and decided that a few members from the CE committee would form a Transfer Workgroup to determine possible policy revision. The workgroup consisted of housing providers, emergency shelter, supportive services, Coordinated Entry, and the SHNI. The workgroup provided a recommendation to the CE committee. The *imminent risk to harm self or others* eligible criteria would be replaced with *Victims of a crime with documentation provided by a police report or a statement by a licensed Mental Health or Substance Use Disorder Treatment Provider*. It was determined that imminent risk is a circumstance that the housing provider would need to address immediately and is not appropriate for the transfer process.

b. Housing Transfer Request Form

- i. The request form would be revised to reflect the D.2 Coordinated Entry Guide Transfer policy's eligible criteria for transfer.

Discussion: HCCSC Board member, Shirene Starn-Tapyrik, asked if the HCCSC policy accounted for victims of rape and/or sexual assault. The SHNI will review the policies to determine if the HCCSC policy covers rape and/or sexual assault. An email vote will be sent out to HCCSC Board members after the policies have been reviewed.

VI. Approval of FY 2019 CoC Competition Documents

Marcie began the discussion about the FY2019 CoC Competition Documents by sharing with the HCCSC Board Members concerns that were raised by an HCCSC Member during the March 11, 2019 HCCSC Members Meeting and distributed a list of concerns that were provided by the same HCCSC Member during the July 2018 HCCSC Members Meeting. The HCCSC Member shared the following concerns: the HCCSC Board approval of FY 2019 CoC Competition Documents the day after the HCCSC Members meeting, an agency/project losing points for a participant passing away, moving to a permanent housing destination, or being evicted (safety concerns were noted with the measurement when it came to evictions), and conflicting scoring criteria when points can be taken away for non-compliance with state, federal and local regulations.

After sharing the HCCSC Member concerns, Marcie suggested the board review the FY 2019 Continuum of Care Priorities prior to discussing the CoC Local Application and Scoring Form.

During the FY2018 CoC Application Competition, Coordinated Entry and HMIS were not prioritized to apply for new/bonus funding, and during last year's competition, there was an opportunity for CoC's to apply for a Domestic Violence bonus and a Coordinated Entry (CE) bonus to support Coordinated Entry and Domestic Violence projects collaboration with confidential data exchange. The HCCSC was unable to apply for the CE bonus because these project types were not prioritized. The System Performance Committee discussed the possibility of new / bonus funding for FY2019 and is recommending that the following project types be prioritized to capture any reallocated or new funding.

The System Performance Committee has recommended the following FY2019 Continuum of Care priorities: Continue with roughly the same allocation as the previous year for Permanent Supportive Housing and Rapid Re-Housing, and for new and/or reallocated funding (in no particular order): Rapid Re-Housing; Permanent Supportive Housing; Coordinated Entry; Homeless Management Information System (HMIS).

Motion: Marcie requested a motion to approve the System Performance Committee recommendation for FY2019 Homeless Continuum of Care of Stark County Priorities. Beverly motioned to approved. Kim seconded the motion and the motion was carried by a unanimous vote of all members present except Shirene, Julie, Cathy, and Marty, whom abstained. The HCCSC Board members are recipients of Continuum of Care Funding and abstained from the vote due to the conflict of interest policy.

a. CoC Application

The FY2019 Local CoC Application was displayed for HCCSC Board members to review. Many of the smaller changes to the application reflect updated dates and/or deadlines and the recommended FY2019 CoC Priorities. Additional changes that were discussed include:

1. Instructions on how FY 2018 consolidated projects should apply for funding and how the projects will be scored
2. Annual Performance Reports (ARRs) must be pulled from the SAGE HMIS Reporting Repository
3. Statement of Work application question and scoring form include additional details around how to answer the question and how points will be awarded
4. Increased the administrative cap to 10% from 7%
5. Moved required signature to the end of the application
6. Additional attachments include a list of agency board members and attendance

Motion: Marcie requested a motion to approve the FY2019 Local Continuum of Care Application as revised. Lynne motioned to approve. JoAnn seconded the motion, and the motion was carried by a unanimous vote of all members present except for Shirene, Marty, Julie, and Cathy. HCCSC Board members Shirene, Marty, Julie, and Cathy abstained from the vote. The HCCSC Board members are recipients of Continuum of Funding and abstained from the vote due to the conflict of interest policy.

b. Scoring Criteria

- i. HCCSC Board members reviewed the FY2019 Continuum of Care competition Scoring Form document. There was a discussion around concerns with the FY2019 CoC Scoring Form that were identified by an HCCSC member at the March 11th, 2019 meeting. The HCCSC Board members discussed pulling information from the Annual Performance Report in the SAGE HMIS Reporting Repository system for the Length of Stay criteria that could result in loss of points awarded for reasons out of the agency/project's control. Providers that attended the HCCSC Board meeting, identified the following project exits that could result in a loss of points during the CoC Application Competition: 1) exit for those who are deceased; 2) exits into permanent destinations before the 366 days; 3) exits to institutions; and 4) exits due to hospitalization. An additional concern was raised with the FY2019 CoC for the Compliance criteria. The criteria did not have a maximum point value that could be deducted from projects for non-compliance with local, state, or federal regulations.

The SHNI will review the FY2019 Scoring Form, take into consideration the feedback provided during the HCCSC Board Meeting and gain additional information prior to asking for approval of the FY2019 Scoring Form.

Motion: Marcie requested a motion to approve the FY2019 Scoring Form and Homeless Continuum of Care policy *D.2 Coordinated Entry Guide and Transfer Form* through an email vote after further review. Kim motioned to approve. Beverly and Danelle seconded the motion and the motion was carried by a unanimous vote of all members present.

VII. Approval of FY 2019 Emergency Solutions Grant Allocation

The Emergency Solutions Grant Allocation discussion will be held during the April HCCSC Board meeting.

VIII. Old Business

IX. New Business

There is a COOHIO Housing Conference held April 8th -10th. COOHIO will be registering participants at a discounted rate through March 22nd, 2019.

X. Adjournment

With no further business to be discussed, at 11:32am, the meeting adjourned.

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Procedures for Inviting and Reviewing Applications for CoC Funding

I. Development of CoC Priorities and Local Timeline, Application, and Scoring Forms

Each year in preparation for HUD's release of the Notice of Funding Availability (NOFA) for Continuum of Care (CoC) grants, the Homeless Continuum of Care of Stark County (HCCSC) will take the following steps to prepare for a local application process designed to identify projects that the HCCSC will recommend for CoC grants:

- A. Identification of Funding Priorities. The HCCSC's System Performance Committee will review available data and data trends, identify gaps in the homeless system, and develop for the HCCSC Board's approval recommendations about CoC funding priorities for the year.
- B. Preparation of Timeline and Application Forms. The HCCSC's Recipient Approval and Evaluation Committee will establish a timeline for the local CoC grant competition that will determine competition deadlines for project applications that are being considered for inclusion in the Consolidated Application that the HCCSC will submit to HUD. In addition, the committee will prepare for Board approval one or more application forms to be used in the local competition and completed by all applicants for CoC funding, including any bonus funding that HUD may make available. Among other things, those forms will:
 1. Identify any criteria that an organization must satisfy to be considered for CoC funds if it has not been a previous recipient of CoC funds; and
 2. Include notice that a project's eligibility to apply for CoC funds may have to be reassessed following the release of the CoC NOFA if the NOFA announces any unanticipated changes in HUD's funding criteria or priorities or if relevant circumstances change significantly before the HCCSC submits its Consolidated Application to HUD.
- C. Preparation of Scoring Form. The Recipient Approval and Evaluation Committee will also prepare for Board approval one or more forms to be used in scoring and ranking projects that apply for CoC funds. As much as possible, those forms should base a project's scores and ranking on objective criteria, including the following:
 1. The project's success in satisfying performance measures adopted or recommended by HUD;
 2. The project's success in meeting system-wide and project-specific performance standards or targets;
 3. The extent to which a project satisfies priorities established by HUD or the HCCSC;
 4. The comparative stability of a project and its sponsoring organization and their capacity to administer the requested CoC grant;
 5. The ability of the project to obtain other sources of support to match and leverage its CoC funding;

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6. The extent to which the project and its sponsoring organization understand and effectively collaborate with the HCCSC by, among other things, participating in relevant committees and workgroups and providing timely notice of proposed additions to or changes in their policies, procedures, or services;
 7. The adherence of the project to its own and system-wide rules governing access to and eligibility for the project, including Housing First, Fair Housing, and Equal Access policies; and
 8. The extent to which project staff attend required professional development sessions and pursue other professional development opportunities.
- D. Solicitation of Feedback from HCCSC Members. The System Performance Committee and the Recipient Approval and Evaluation Committee will review their findings and preliminary recommendations with members and consider feedback received from the members before finalizing their recommendations to the Board on CoC funding priorities and CoC application and scoring forms.

II. The Application Workshop

Each year, the Collaborative Applicant will hold a workshop for prospective CoC grant applicants. In preparing for and conducting this workshop, the Collaborative Applicant will observe the following guidelines:

- A. Notice of Workshop. Before the annual pre-application workshop, the Collaborative Applicant will:
 1. Place an advertisement about the workshop in the three newspapers of general circulation in Stark County; and
 2. E-mail a notice of the workshop to all individuals on the HCCSC listserv.
- B. Workshop Agenda. At the workshop, the Collaborative Applicant will:
 1. Review with attendees the application form that all applicants must complete in order to receive HCCSC endorsement to submit an application for CoC funding to HUD;
 2. Discuss the procedures and timelines for submitting applications for the local competition;
 3. Discuss any special rules applying to organizations that have not received CoC funding previously;
 4. Discuss HCCSC priorities as approved by the HCCSC Board;
 5. Review the form(s) that will be used to score applications;

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6. Discuss any documents required to be submitted with the local application; and
7. Discuss any additional project requirements during the local competition such project presentations and/or project site visits.

III. The Local Application Process

- A. Publication of Application Deadline and Relevant Forms. Following Board approval of the application and scoring forms to be used in the local CoC competition, the Collaborative Applicant will publish an ad in each of the three newspapers of general circulation in Stark County. This ad, which may be the same ad described above that announces the application workshop (see section II.A. above), will describe the type(s) of new project(s) the HCCSC Board will be considering for funding. It will also announce the deadline for submitting applications and indicate where interested persons can find copies of the application and scoring forms.

The Collaborative Applicant will also:

1. Post a notice of the application deadline along with relevant application and scoring forms on the HCCSC's website; and
 2. Send an e-mail to all individuals on the HCCSC's listserv notifying them of the due date for applications and directing them to the HCCSC website for more information.
- B. Eligibility of Applications for Consideration. To be considered for CoC funding, applications for the local competition must be completed in their entirety and submitted along with any required attachments by the published due date.
- C. Application Scoring Process. The Recipient Approval and Evaluation Committee will review and score applications using the scoring form(s) approved by the HCCSC Board. In the reviewing and scoring process, the following guidelines will apply:
1. The Recipient Approval and Evaluation Committee may take into consideration, not only information submitted in or with the application, but also information derived from other sources, including but not limited to:
 - a. Recent Annual Performance Reports (APRs) and status reports submitted by the applicant;
 - b. Recent financial statements and audits;
 - c. Recent project audits and monitoring reports and any responses to those audits or reports;
 - d. Recent on-site reviews of the applicant conducted by the Collaborative Applicant; and
 - e. HUD monitoring reviews and recipient responses.

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2. The Recipient Approval and Evaluation Committee may schedule a meeting with representatives of the applicant organization to solicit information beyond that submitted in the application and take that additional information into consideration when scoring the application.
3. The Recipient Approval and Evaluation Committee may assign responsibility for reviewing and evaluating discrete portions of an application to particular committee members and rely on those evaluations in scoring the project on related criteria.
4. For each criterion listed on the scoring form, applications will receive a score based on a consensus reached by the members of the Recipient Approval and Evaluation Committee.
5. A project's final score on the application will be the total points earned by the project as a percentage of the total points available to the project. Points will be considered "available to a project" only if the scoring criterion on which those points are based can be applied to the project.

IV. Notice and Appeal of Committee Decisions on Applications

- A. Notice of Review Outcomes. Following the Recipient Approval and Evaluation Committee's review and scoring of each timely and complete project application, the Collaborative Applicant will send a copy of the project's scoring form to the applicant organization. In addition, the Collaborative Applicant will send a letter to the applicant organization indicating whether, based on its score, the Recipient Approval and Evaluation Committee will be recommending that the HCCSC Board approve the project for inclusion in the Priority Listing that the HCCSC will submit to HUD as part of its next Consolidated Application. In cases in which the committee decides against recommending a project for inclusion on the listing, the letter will explain the reasons why that recommendation was withheld, and, where appropriate, what the organization can do to improve its chances of receiving CoC funding in the future.
- B. Requests for Reconsideration of Score or Endorsement. Within 5 working days following its receipt of a project scoring form and the accompanying letter announcing the Recipient Approval and Evaluation Committee's decision to recommend or not recommend the project for inclusion on the Priority Listing, the applicant organization may submit a letter to the Collaborative Applicant requesting reconsideration, submitting supporting documentation where relevant, and outlining all the reasons why the committee should reconsider the project's scores and its omission from the Priority Listing.
- C. Response to Requests for Reconsideration. The Recipient Approval and Evaluation Committee will review all requests for reconsideration and respond to them through the Collaborative Applicant

V. Development of Conditional and Final Priority Listings

- A. Approval of a Conditional Priority Listing by HCCSC Board. After the application appeals process has concluded, the Recipient Approval and Evaluation Committee will recommend to the HCCSC Board projects to be included in the Priority Listing that will be submitted to HUD as part of the

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HCCSC's next **Consolidated** Application. Barring unforeseen changes in funding criteria or priorities which HUD announces in the CoC Notice of Funding Availability (NOFA) for the year or significant changes in other relevant circumstances the conditional Priority Listing, if approved by the Board, will determine the projects included on the final Priority Listing.

- B. Notice of the Board's Decision. All applicants will receive notice in writing of the Board's decision regarding the projects to be included in the **final** Priority Listing **after** that decision is made.
- C. Review of NOFA for Possible Impact on Conditional Priority Listing. **After HUD has issued its annual NOFA**, the Collaborative Applicant will determine whether projects included on the conditional Priority Listing are eligible for funding and continue to meet HUD funding priorities as reflected in the NOFA. It will also determine whether enough eligible projects have applied to take advantage of all available CoC funds. In determining whether enough eligible projects have applied, the Collaborative Applicant will consider applications submitted for projects that were not approved for the conditional Priority Listing as well as applications for projects that were not recommended for full funding.
- D. Publication of Notice of HUD's NOFA. **After HUD has issued its annual NOFA**, the Collaborative Applicant will publish a public notice that will include:
 - 1. Information about the local application process; **and**
 - 2. A request for additional proposals in the event that the most recent local competition yielded an insufficient number of eligible projects to take advantage of available CoC funding.
- E. Second Round of Applications. Following the solicitation of additional applications in accordance with Section D.2, the steps outlined in Section III will be repeated to review and score a second round of applications. In that event, the Collaborative Applicant, in consultation with the Recipient Approval and Evaluation Committee, will exercise its discretion to modify schedules and procedures as necessary to meet the deadline for submission of the final CoC Grant applications.

VI. Preparation of Final Applications, Priority Listings, and Rankings for Submission to HUD

- A. Deadlines and Instructions for Submitting Final Applications.
 - 1. Unless the NOFA or other changes in circumstances provide any reason to conclude that a project conditionally approved for inclusion on the Priority Listing should not be included in the final listing, the Collaborative Applicant **will notify the project applicant** of the NOFA's release to begin completing its application in *e-snaps*.
 - 2. All applicants **notified** must complete their applications in *e-snaps* in accordance with any instructions given by the Collaborative Applicant.

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3. In the following circumstances, the Collaborative Applicant will notify the project applicant to begin completing its application in *e-snaps* as soon as possible and will adjust the deadline for that application as necessary to meet HUD's deadline for submission of the Collaborative Application:
 - a. Changed circumstances or new information in the NOFA have given rise to questions that must be resolved about whether a project on the conditional Priority Listing should remain on the final listing; and
 - b. The Recipient Approval and Evaluation Committee did not endorse a project for funding until after the NOFA was issued.
- B. Final Review of Applications by Collaborative Applicant. As applications are submitted in *e-snaps*, the Collaborative Applicant will review the applications to ensure that they conform to the applications approved by the Recipient Approval and Evaluation Committee and that they are complete and, at least on their face, accurate and consistent. If an applicant is required to make any changes, the Collaborative Applicant will return the application via *e-snaps* with an email explaining needed changes and the deadline for making those changes.
- C. Preparation of Final Priority Listing. It is the responsibility of the Recipient Approval and Evaluation Committee to develop for HCCSC Board approval:
 1. A final list of the projects to be included on the Priority Listing submitted with the Collaborative Application; and
 2. Any other list of recommended projects that HUD requires Continuums to prepare as part of a competition for bonus funds available through the CoC Grant program.
- D. Ranking of Projects. It is also the responsibility of the Recipient Approval and Evaluation Committee to rank those projects, using a method developed by the Committee, reviewed by HCCSC members, and approved by the HCCSC Board **each year.**
- E. HCCSC Approval of the Collaborative Application. Before submitting the **Consolidated Application** to HUD, the Collaborative Applicant will solicit HCCSC Board approval for the application as a whole and for its ranking of individual applications. In requesting this approval, the Collaborative Applicant will:
 1. Explain to the Board any instances in which the ranking of individual applications was based on factors other than application scores; and
 2. Provide an opportunity for the Board to ask questions, and, based on a majority vote, change the ranking.

VII. Reallocations

- A. Responsibility for Proposing Reallocations. The Collaborative Applicant and Recipient Approval and Evaluation Committee should consider the possibility of recommending that all or part of the CoC funding currently received by a project be reallocated for any good cause, including the following:
1. The project has consistently failed to meet performance standards established by HUD or the HCCSC;
 2. The Collaborative Applicant and HMIS have been obliged to spend a disproportionate amount of time overseeing the project due to its repeated failures to:
 - a. Submit timely and accurate data and reports required by HUD or the HCCSC;
 - b. Follow other policies and procedures prescribed by HUD or the HCCSC; or
 - c. Cooperate with the efforts of the HCCSC to improve the performance of the project or the homeless system as a whole.
 3. The project has repeatedly underspent its CoC funding or otherwise mismanaged its CoC grant;
 4. HUD priorities or policies have changed, putting the project at risk of being defunded;
 5. HCCSC priorities or policies have changed with the result that the project no longer plays the role it previously did in promoting the HCCSC's strategies for ending homelessness;
 6. The project is unusually expensive compared with other projects of its type; or
 7. Some or all the funds received by the project can be put to higher and better uses to achieve the HCCSC's goals for ending homelessness.
- B. Process for Effecting Reallocations.
1. Notice to Current Recipient. In the event that the Collaborative Applicant and Recipient Approval and Evaluation Committee agree that the HCCSC should consider reallocating CoC funds from a current recipient, the Collaborative Applicant will provide prompt notice to the project. That notice should include:
 - a. The reasons for recommending that reallocation be considered; and
 - b. The amount recommended for possible reallocation.

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2. Timing of Notice.
 - a. General Rule. Generally, notice to the current recipient should be provided before the local application process begins so that the ad announcing the start of the local competition (see section III. A. above) can include information about the amount of funding that may be available through reallocation.
 - b. Unusual Circumstances. Under unusual circumstance, the notice to the current recipient may be given after the start of the local competition. "Unusual circumstances" may include:
 - i. Information received from HUD after the start of the local competition that suggests that funding for the project may be in jeopardy; and
 - ii. The discovery of new facts and circumstances about the project or its sponsoring organization that call into serious question the ability of the project to fulfill its current commitments to HUD or to the HCCSC or manage additional CoC grants.
3. Reallocation Decisions. The Recipient Approval and Evaluation Committee will develop a final recommendation regarding proposed reallocations during the course of its review of all local applications for CoC funding. In developing this recommendation, the committee must take into consideration:
 - a. The current recipient's application or applications for continuing CoC funding, including, if it chooses to submit them after receiving notice of possible reallocation, its application for the entire amount of funding it has been receiving and its application for a sum reduced by the amount the Recipient Approval and Evaluation Committee has proposed to reallocate; and
 - b. All applications from new projects requesting all or part of the reallocated funds.
4. Appeal and Finalization of Reallocation Decisions. The process for appeal and finalization of reallocation decisions will be the same process outlined in section IV through VI for all other applications.

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Procedures for Monitoring and Evaluating CoC-Funded Projects

I. Evaluation - In General

- A. Responsibility for Evaluation. The Collaborative Applicant, with the help and guidance of the Recipient Approval and Evaluation Committee, will monitor and evaluate the performance of CoC-funded projects and their compliance with funding requirements.
- B. Evaluation Methods. The Collaborative Applicant will use the following methods to monitor the performance and compliance of projects:
1. Quarterly Status Reports;
 2. Quarterly Annual Performance Reports (APRs) ;
 3. Final APRs;
 4. Audits, monitoring reports of HUD or any other source and any responses to those audits and reports; and
 5. Annual site visits.

II. Quarterly Status Reporting

- A. Quarterly APRs. HMIS (Homeless Management Information System) Participating Agencies have access to retrieve any individual and aggregate data entered in to the HMIS by their own programs. To ensure that recipients are meeting relevant performance targets, HMIS Participating Agencies will submit quarterly APRs on each CoC-funded project as follows:
1. With the exception of the final APR covering the entire grant period which must be submitted as prescribed in Section III below, APR data will be compiled by the HMIS Participating Agencies and submitted to the Collaborative Applicant by the 15th of the month following the end of each quarter of the grant period.
 2. HMIS Participating Agency APRs will be cumulative, covering all quarters of the grant period that have ended before the report's due date.
- B. Quarterly Status Report Forms. In collaboration with recipients, the Collaborative Applicant will develop for the approval of the Recipient Approval and Evaluation Committee and the HCCSC Board, a status report form which will be used to solicit information needed to ensure that recipients are operating efficiently and otherwise satisfying program requirements.
- C. Quarterly Status Reports. Using the approved form, recipients will be required to submit quarterly status reports for each CoC-funded project as follows:
1. Status reports will be due to the Collaborative Applicant by the 15th of the month following the end of each quarter of the grant period.

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2. Each report will **include a financial status update** that will be cumulative, covering all quarters of the grant period that have ended before the report's due date.

D. Status Report Reminders. At least 30 days before an organization is scheduled to submit a status report, Collaborative Applicant will send a reminder by e-mail to the **designated agency contact**. The e-mail will include the date the report is due along with a copy of the report form and instructions for submitting the form.

III. Annual Performance Reports to HUD (APRs)

A. Submission of APR Draft. Within 60 days after the end of a project's grant period, the recipient must submit a draft of its HUD-required APR for the project to the **Collaborative Applicant**. Within 10 days after receiving the APR, the **Collaborative Applicant** will:

1. Review the report to ensure that it is complete and free from errors and omissions that would reflect poorly on the HCCSC or contribute to an inaccurate picture of its performance as a system; and
2. Send a letter to the recipient outlining any questions or concerns raised by the report.

B. Submission of Final APR. Within 10 days of submitting the final version of an APR in the **Sage HMIS Reporting Repository**, a CoC recipient must send an **email** to the report to the **Collaborative Applicant** stating that the APR has been submitted.

IV. Audits and Monitoring Reports. Along with each required status report and APR, recipients must submit to the **Collaborative Applicant** a copy of any financial audits and program audits or monitoring reports they have received from HUD or any other source since their last submission and any responses they have prepared to those audits or reports.

V. Annual Site Visits

A. Timing and Scheduling of Site Visits

1. The **Collaborative Applicant** will conduct an annual site visit with each recipient. In cases where a recipient operates more than one CoC-funded project, the **Collaborative Applicant** may schedule two or more site visits as necessary to effectively monitor all of the projects.
2. Normally, a site visit will occur approximately 6 months after the beginning of the recipient's grant year. However, it may occur sooner if status reports indicate a need for earlier intervention. In cases where a recipient operates two or more CoC-funded projects with different grant years and the **Collaborative Applicant** chooses to conduct a single site visit to monitor these projects, the **Collaborative Applicant** will determine the timing of the visit based all relevant factors, including the prior performance of each project that will be monitored and the HCCSC's need for timely information about each.
3. The **Collaborative Applicant** will contact a recipient to schedule a site visit 30 days before a visit is due and send to the recipient a copy of the monitoring form that the **Collaborative**

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Applicant will be using, identifying sections of the form that the recipient must complete before the visit.

B. Purpose of the Visit

During the site visit, the **Collaborative Applicant** will check the items identified on the monitoring form to ensure that the recipient is meeting all HCCSC requirements as well as HUD's recordkeeping requirements and all other federal regulations pertaining to CoC funding.

C. Notice of Deficiencies

Following the site visit, the **Collaborative Applicant** will give the recipient a copy of the monitoring form reflecting any notes taken during the visit. In addition, the recipient will receive a letter from the **Collaborative Applicant** citing any deficiencies noted during the visit and requesting:

1. An explanation for each cited deficiency; and
2. A plan for correcting each deficiency.

VI. Role of the Recipient Approval and Evaluation Committee

A. Regular Meetings to Assess Project Performance. The Recipient Approval and Evaluation Committee will meet at least quarterly to receive feedback from the **Collaborative Applicant** on status reports, APRs, audits and monitoring reports, and the results of site visits in order to determine whether projects are meeting performance goals and other expectations.

B. Notice to Poor Performers. In the event that a project (1) is not meeting performance goals; (2) did not provide a sufficient explanation for deficiencies identified during a site visit; or (3) did not follow the plan approved by the **Collaborative Applicant** for correcting such a deficiency, the committee will re-evaluate concerns about the project's performance and, at its discretion, instruct the **Collaborative Applicant** to send a letter to the fund recipient requesting other or additional correction measures.

C. Assistance to Poor Performers. The HCCSC, through the **Collaborative Applicant** and Recipient Approval and Evaluation Committee, will provide reasonable assistance to underperforming recipients by, among other things:

1. Directing them to other providers that are achieving better results;
2. Directing them to research, webinars, websites, and other resources that could provide useful information and instruction; and
3. In cases where poor performance in a particular area is common among HCCSC providers, sponsoring or helping to arrange relevant training sessions for them.

D. Action in the Case of Persistent Poor Performance

If, after a recipient has received notices of poor performance over two grant years and, in the

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judgment of the Recipient Approval and Evaluation Committee, has made insufficient progress in correcting its deficiencies, the committee may, depending on the severity of the deficiencies:

1. Notify HUD of the facts supporting the concerns about the recipient's poor performance;
and
2. Request HUD's assistance in working with the recipient to determine whether (a) performance issues can be resolved; (b) the project or projects in question should be transferred to another agency; or (c) funds should be reallocated in accordance with most current HUD guidelines.

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CoC
QUARTERLY STATUS REPORT

Project Name:

Agency:

Contact Tel. Number:

Contact Person:

Grant Period (FY and OY):

Report Period (Quarter):

Financial Status Update:

	TOTAL AWARD	QUARTERLY \$ AMOUNT DRAWN	YTD \$ AMOUNT DRAWN	% of TOTAL AMOUNT DRAWN (award/YTD amount drawn)
Rental Assistance				
Leasing Assistance				
Administration				
Supportive Services				
Operating				
HMIS				
TOTAL				
Cash Match				

Do you expect an underutilization of funds? YES NO

* If yes, please explain reasons and also actions being taken to address this:

Any concerns with insufficient match and/or documenting match? YES NO

* If yes, please explain reasons and also actions being taken to address this:

Project Update:

- 1) Please note any activities that have deviated (activities added or activities eliminated) from your original funding application for this grant year.
- 2) Please identify any challenges you are currently experiencing with the CoC system as a whole or with your program. In particular, please explain in detail any problems you are having meeting HUD performance measures or any additional performance measures applicable to your program.
- 3) Please identify any experiences of particular value or success that you would like to share regarding your program/participants during this reporting period.
- 4) Please identify and discuss any monitoring reviews that were done during the reporting period and the outcome of the reviews.
- 5) Please indicate any grant amendments you will be proposing to HUD and reasons for any amendments. Also include any amendments that have already been approved and the reasons for those amendments.

Performance Outcomes Update:

Please answer where applicable to project type:

1. **ALL PROJECTS:** Describe any issues you are having with the HMIS system and/or data entry within your project(s) in general:
2. **RRH Projects ONLY-** Shortening the length of time between Intake and Housing Placement- Describe activities carried out to ensure that participants are quickly accessing housing. Local target, from time of entry into the rapid rehousing project to being housed, is 30 days. Please indicate challenges associated with meeting this target and strategies being developed to improve in this performance outcome. *(Please note: Recipients are not being asked to provide numerical data on this measure for the status reports; outcomes on this measure will be tracked quarterly by the APRs submitted with this quarterly report):*
3. **ALL PROJECTS- Recidivism** - Indicate what percentages of participants exiting this quarter that were paying 50% of their income towards their rent at the time of exit, under 50% of their income, and over 50% of their income:

4. **ALLPROJECTS-Reducing Homelessness & Increasing Exits to Permanent Housing**– Please provide a brief explanation of the number of participants that exited into permanent destinations and the number of participants that were terminated from the project this quarter.

Please provide the number of transfer requests this quarter:

Please provide the number of transfer request granted this quarter:

5. **AllProjects-Income/Benefits**–Please respond briefly to the questions below regarding access to employment and linkage to mainstream assistance. *(Please note: Recipients are not being asked to provide numerical data on this measure for the status reports; outcomes on this measure will be tracked quarterly by the APRs submitted with this quarterly report):*

- a. Changes (i.e. new staff, new partnerships, or new initiatives) put in place to assist with increasing employment income:
- b. Changes (i.e. new staff, new partnerships or new initiatives) put in place to assist with increasing non-employment income: (example, SSI, SSDI):
- c. Changes (i.e. new staff, new partnerships, or new initiatives) put in place to provide better access and transportation to mainstream benefit appointments and follow-up with participants regarding whether they are receiving and utilizing mainstream benefits:

This form must be submitted to the Stark Housing Network Inc. quarterly on the 15th of the month for CoC funded projects. Please follow the quarterly reporting schedule provided to your agency by the Stark Housing Network Inc.

Date received by SHNI _____