HOMELESS CONTINUUM OF CARE OF STARK COUNTY
BOARD MEETING
Tuesday, May 14, 2019
9:30am at the Community Campus at Goodwill
Meeting Minutes

Members Present
John Aller
Rollin Seward
Beverly Lewis
Kim Kroh
Shirene Starn Tapyrik
Julie Sparks
JoAnn Breedlove
Marty Chumney
Maria Heege
Cheli Curran
Danelle Lightner

SHN
Marcie Bragg
Melissa Terrell

Guest
Commissioner Janet Creighton
Joni Close,
    Sisters of Charity Foundation
Karen McQueen,
    Krugliak Wilkins Griffiths and Dougherty

Members Not Present
Lynne Dragomier
Shannon McMahon Williams
Lisa Warden
Captain Gabbard
Cathy Jennings

I. Welcome and Approval of March and April Meeting Minutes

At 9:33 a.m., Marcie Bragg, Board Chair, called the meeting to order and welcomed everyone.

Marcie welcomed guests Commissioner Janet Creighton, Jonie Close of the Sisters of Charity Foundation, and attorney Karen McQueen of Krugliak Wilkins Griffiths and Dougherty, to the Homeless Continuum of Care of Stark County (HCCSC) Board meeting. Guests, Commissioner Janet Creighton and Jonie Close, were invited to the board meeting to discuss the Stark Housing Network, Inc. (SHNI) and the SHNI's role as the Collaborative Applicant for Stark County. Commissioner Creighton acts as the SHNI Board chair and Joni Close acts as the SHNI Board treasurer. Guest, Karen McQueen, was invite to the board meeting to discuss the Homeless Continuum of Care of Stark County (HCCSC) Governance Charter as it relates to the Memorandum of Understanding (MOU) between the SHNI and HCCSC. HCCSC Board members introduced themselves and the agency they represent.

Kim Kroh entered the meeting at 9:39am.

Discussion: Marcie addressed HCCSC Board members regarding the March meeting minutes. HCCSC Board member Shirene Starn-Tapyrik requested that her name be reflected in the minutes along with the discussion regarding the SHNI. The March meeting minutes were amended to include the HCCSC Board member's request.

Motion: Marcie requested a motion to approve the Homeless Continuum of Care of Stark County Board meeting minutes, as amended, for the month of March. Julie motioned to approved. JoAnn seconded the motion, and the motion was carried by a unanimous vote of all members present except for John Aller, Maria Heege, Chelie Curran, and Rollin Seward, whom abstained. The HCCSC Board members that abstained were not present during the March meeting.

Motion: Marcie requested a motion to approve the Homeless Continuum of Care of Stark County Board meeting minutes for the month of April. Julie motioned to approved. Beverly seconded the motion, and the motion was carried by a unanimous vote of all members present except for John Aller, Maria Heege, Chelie Curran, JoAnn Beedlove, and Danelle Lightner, whom abstained. The HCCSC Board members that abstained were not present during the April meeting.

II. Conflict of Interest Policy and Form

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 Endorsements Request/s for The Ohio Development Services Agency (ODSA) PY2019 Funding competition.

III. Review of the Stark Housing Network, Inc. (SHNI) and the HCCSC

a. **Janet Weir Creighton, SHNI Board Chair**
  i. Commissioner Janet Creighton thanked all HCCSC Board members for their roles in each of their agencies and the impact these agencies make in the community. The Commissioner stated how important it is to be present with the HCCSC Board members during this meeting to build and keep open lines of communication between the Stark Housing Network Inc. (SHNI) Board and HCCSC Board. Additionally, the Commissioner commented that representatives from the SHNI Board should annually join the HCCSC Board for updates and discuss community collaboration. The Commissioner continued to state that the SHNI Board is very committed to the SHNI organization; the SHNI Board meets four times a year (additional meetings are called when necessary) and meeting minutes are recorded. The SHNI Board has eight founding members that are committed to the cause of ending homelessness. The current SHNI Board members are: Commissioner Janet Creighton as SHNI Board chair; Joni Close of the Sisters of Charity Foundation as the SHNI Board treasurer; Massillon Mayor Kathy Catazaro-Perry; Rollin Seward Community Development Director, City of Canton; Joe Mazzolla City of Alliance Director of Planning and Development; Maria Heege United Way; Stephanie Warren Leadership Stark County; and John Aller Executive Director StarkMHAR. There are several members of the SHNI Board that overlaps with the HCCSC Board. The SHNI Board participation is currently 8 people with a limit of up to 15 people; new members will need approval from current members to be consider for a board seat. The SHNI Board executes an annual extensive review of Marcie's performance and has great confidence in Marcie's ability to lead the HCCSC. Additionally, the SHNI has an independent Certified Public Accountant (CPA) to prepare and review all SHNI financials and 990's. Commissioner Creighton added that there is commitment from the Commissioners' Office to continue serving the homeless population at this capacity with the SHNI.

b. **Joni Close, SHNI Treasurer**
  i. Joni Close discussed the history of Stark County's Continuum of Care (CoC). In the past JeanVan Ness of the Sisters of Charity Foundation was the primary contact for the CoC and the Stark Regional Planning Commission acted as the Collaborative Applicant for Stark County. In September of 2015, a summit was held in Stark County to discuss the Department of Housing and Urban Development (HUD) CoC requirements, funding, and to gain a feedback from community members. Additionally, Stark County officials were gathered to determine the best options for Stark County as an entitlement county versus joining the Balance of State (BoS); Stark is an entitlement county meaning that the funding coming into Stark would be for Stark County projects only as compared to Stark County moving into the BoS and Stark County's funding being dropped into a pot of funding with 80 other counties in the BoS funding competition. The HCCSC's Executive Committee met with the mayors from Canton, Massillon, and Alliance and members from other prominent organizations to gain buy-in from the communities and community members to create an independent non-profit organization to act as the Collaborative Applicant. It was determined that Stark would remain an entitlement county and form an independent non-profit organization to oversee CoC activities, and thus, a new backbone organization was formed. In 2016, the search committee maintained the name of the Stark Housing Network, Inc. as the backbone organization and re-affirmed the mission statement of the SHNI. Jean Van Ness reviewed the Columbus Community Shelter Board's Code of Regulations to create the SHNI Code of Regulations; this Code of Regulations was finalized in November of 2016. The HCCSC Board of Directors approved a position description for the SHNI and established a search committee to identify candidates for the Executive Director position. In January of 2017, Kurt Williams was hired as the Executive Director, and in May of 2017, the SHNI was recognized by the IRS as a 501(c)3. January 1st, 2018, the SHNI became the employer of record for Marcie and Melissa.

c. **Karen McQueen, L.P.A.**
  i. Karen McQueen has reviewed the HCCSC's Governance Charter (GC) and SHNI Code of Regulations (CoR) to discuss with the HCCSC Board members. The HCCSC GC serves as By-Laws for the HCCSC and is a document of how the Board and committees will function with the Collaborative Applicant. There is an active Memorandum of Understanding (MOU) between the HCCSC and the SHNI that outlines the SHNI's role as Collaborative Applicant; the MOU states the SHNI's scope of work to be completed on behalf of the HCCSC. The SHNI provides staff and support to complete the CoC activities required by HUD. The SHNI CoR requires that 25% of the SHNI Board must be comprised of current HCCSC Board members; there are currently three members that hold positions on both boards. The HCCSC GC has a

requirement of no less than fifteen and no more than eighteen board members; currently there are seventeen HCCSC Board members. Each HCCSC Board member will hold a staggering three-year term. The HCCSC Board must be comprised of the following: a formerly homeless person; a representative from both public and private sectors; three representatives from housing or services; and an Emergency Solutions Grant recipient. The HCCSC Board members can fill more than one HCCSC GC required criteria on the board. The HCCSC Executive Committee is responsible for soliciting HCCSC Board member recommendations from the Continuum or housing; soliciting HCCSC Board members is through a nomination process and current HCCSC Board members should not assume that they will be re-appointed. The HCCSC Board is required to cultivate leadership with new Board members' experience and expertise in their perspective fields. Although very rare, there are instances when HCCSC Board members can be removed from their positions as an HCCSC Board member. Karen discussed that the HCCSC GC does not specifically state rules around calling an executive session, and so, the HCCSC Board should follow Robert's Rule of Order when calling an executive session; currently the HCCSC Executive Committee is the body that can call an executive session and the remaining HCCSC Board members would have to take a vote for board majority before moving into an executive session. In the event of an executive session, the Executive Director of the Stark Housing Network, Inc. is required to be a part of these sessions as the HCCSC Board Chair.

At 10:07 am the guests, Commissioner Janet Creighton, Joni Close, and Karen McQueen left the meeting.

IV.   **Review of the HCCSC Structure and Website**
Marcie distributed a board and committee diagram that displays how information flows through the Continuum of Care. Information flows from the Members meetings up through committees for discussion before any items are brought to the HCCSC Board for approval/discusion. The committees and workgroups are where a bulk of the work is completed and information is vetted thoroughly through these committees for system changes; the SHNI Board is notified and/or solicited for information of major changes in the system. The flow of information can also be from the boards down to the committees and then to Members. Marcie briefly discussed the various committee and roles in the Continuum (a full committee description, including members, can be located on the Starkcountyhomeless.org website).

The HCCSC Board was provided with a website overview regarding the different types of information on the website and where this information is located. Marcie asked that any Board member that has edits or new information to please provide this information to the SHNI.

V.   **Approval of D.2 Coordinated Entry Guide** *(See Attachment 1)*
The D.2 Coordinated Entry Guide was brought to the HCCSC Board in March 2019 for approval of the eligible reasons for transfer. HCCSC Board member Shirene Starn-Tapyrik asked the SHNI to review the policy to ensure the policy included victims of a rape or sexual assault under the Victims of Violence Against Woman's Act (VAWA). The SHNI reviewed the HCCSC policy, HUD guidance for domestic violence, and Victims of a Crime Act to determine if the HCCSC policy is in compliance with HUD regulation. The Coordinated Entry committee discussed the information found in the guidance and made recommendations for policy change; there was additional language added to the D.2 Coordinated Entry Guide to include victims of rape and sexual assault that are not required to show documentation to be eligible under the HCCSC's emergency transfer policy for beneficiaries of VAWA.

Motion: Marcie requested a motion to approve the Homeless Continuum of Care of Stark County D.2 Coordinated Entry Guide as amended. Shirene motioned to approved. Cheli seconded the motion, and the motion was carried by a unanimous vote of all members present.

VI.   **CoC Strategic Plan - Proposed Agenda** *(See Attachment 2)*
Marcie distributed a proposed agenda for the CoC Strategic Plan that will be facilitated by Katie Kitchin from Corporation for Supportive Housing (CSH). The Strategic Plan will provide System Modeling of the HCCSC's

Current state versus the HCCSC's ideal state. The System Modeling will help identify areas of focus and identify strengths and weaknesses with sub-populations. This is a two day session; the first day will include stakeholders of the HCCSC and the second day will include managers and direct staff. Currently, Katie is proposing June 26th and 27th to hold these facilitated meetings. Marcie requested that anyone planning on attending one and/or both days of the facilitated meetings email her so she can compile a guest list for Katie.

Additionally, Katie has been provided with the HIC and PIT data from 2019; Katie has entered this data into a System Modeling Tool she will utilize for the Strategic Plan. Marcie requested this data, as presented in the tool, from Katie prior to the meeting dates to allow time for any corrections in advanced from providers.

Strategic Planning has become a focus for HUD's funding competition after the FY2018 CoC Program funding competition debriefing. There has been tremendous work done to get the HCCSC operating at this level. However, the HCCSC has been built up so much over the last several years that the HCCSC may have leveled out in the scoring competition; the Strategic Plan should identify next steps to assist the progression of the HCCSC and it is anticipated that the Strategic Plan will assist in the FY2019 CoC Program funding competition.

Discussion: Marcie asked the HCCSC Board for recommendations of those that should be involved in these conversations; HCCSC Board members recommended soliciting people with lived experience (such as people that currently are occupying a CoC unit) and Stark County landlords to gain their perspective on the system. HCCSC Board member, John Aller, requested that the second day of the facilitated meeting end around 3:30pm for him to attend StarkMHARS's Board meeting.

VII. **Update on FY2019 CoC Application Competition**
The SHNI updated the HCCSC Board members on the progression of the FY2019 Local CoC Application process. The SHNI anticipates that HUD's Notice of Funding Availability (NOFA) may be released roughly three weeks earlier than in past competitions; the anticipation of the NOFAs early release is a result of HUD's early registration for CoCs' competing in the FY2019 CoC Program funding competition. The SHNI has taken steps to prepare for the NOFA's release; projects that have ended and submitted an Annual Performance Report to the SAGE HMIS Reporting Repository are able to have data extracted and scored prior to the application deadline on May 31st. Additionally, Annual Renewal Demand (ARD) projects have submitted up-to-date policies and procedures for review prior to the application deadline.

At 10:40am, HCCSC Board members Julie Sparks, Cheli Curran, and Shirene Starn-Tapyrik left the meeting to avoid a conflict of interest.

VIII. **Approval of Endorsement Request/s for ODSA PY2019 Funding**
Marcie discussed upcoming CoC endorsements for Supportive Housing Projects (SHP) and Homeless Crisis Response Program (HCRP) projects seeking funding from the Ohio Development Services Agency (ODSA). In PY2018, the HCRP and SHP project applicaitons were submitted on the same date in June; the PY2019 competition is requiring HCRP projects to submit applications by June 26th, 2019 and SHP projects to submit applications by June 6th, 2019. The SHNI received two requests for endorsements:

1) YWCA - New Beginnings Housing
- Total ODSA Request is $306,000; Supportive Services - $39,800, General Administration $15,300, Operating Expenses $250,900)
- This request is the same as the previous request that has been awarded for the PY2017 competition; these are two year grant cycles and the operating years will be PY2020-2021.

2) Coleman Professional Services - Changing Destinies Massillon TAY Apartments
- Total ODSA Request is $156,176; Supportive Services $108,914, Operating Expenses $47,262

- Coleman has solicited funding in the FY2018 CoC Local Application competition; this project was not included on the priority listing for projects seeking CoC Program funding because it did not meet the HUD criteria.

Marcie will be sending out an email vote for endorsement of these projects after the Recipient Approval and Evaluation Committee members have made a recommendation to HCCSC Board. The vote requested will be an individual vote of each requested endorsement.

At 10:47am, HCCSC Board members Julie Sparks, Cheli Curran, and Shirene Starn-Tapyrik entered the meeting.

IX.   Old Business
        N/A

X.   New Business
        N/A

XI.   Adjournment
        With no further business to be discussed, at 10:50am the meeting adjourned.

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D.2.

The Homeless Continuum of Care of Stark County's Coordinated Entry Guide

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I. Overview of the HCCSC Coordinated Entry System

    A. <u>Purpose</u>. The policies and procedures in this Coordinated Entry Guide (the *CE Guide*) govern the operation of the coordinated entry system (CES) that the Homeless Continuum of Care of Stark County (HCCSC) has established to register, assess, and prioritize requests for shelter, housing, and supportive services made by people who are homeless or at risk of becoming homeless. The purposes of the CES are to ensure that Stark County:

        1. Affirmatively markets and provides easy access to assistance for all people in the county who are experiencing housing crises;

        2. Assesses in a fair and consistent manner all requests for help in securing or stabilizing housing and follows uniform rules in prioritizing those requests; and

        3. Makes available to people the assistance that best suits their needs and preferences.

    B. <u>Participation in the System and Use of this Guide</u>. All homeless service providers in Stark County that are receiving Continuum of Care (CoC) or Emergency Solutions Grant (ESG) funds or funds from Ohio Development Services Agency (ODSA) programs, including the Homeless Crisis Response Program, are required to (1) participate in the CES described in the *CE Guide* and (2) follow the *CE Guide* and the HCCSC's *Policies Governing Eligibility and Prioritization to Receive Assistance and Standards for Administering Assistance* (*Eligibility and Prioritization Policies*) in prioritizing eligible persons for service. In addition, the Collaborative Applicant will make every effort to encourage other Stark County providers of housing and services for the homeless to participate in the CES and follow the policies and procedures established for its operation.

    C. <u>Management of the Coordinated Entry System</u>. The combined staff of the Homeless Navigation Hotline (the Hotline) and the Homeless Management Information System (HMIS) is responsible for operating the CES; prioritizing people for assistance based on their assessments and on the HCCSC's *Eligibility and Prioritization Policies*; maintaining one or more prioritization lists from which housing and homelessness prevention service projects receive direct referrals of eligible persons in the order of their ranking; and referring people to emergency shelter. By-Names List meetings are held weekly to operationalize the referral process, Quality Assurance Workgroups help Hotline and HMIS staff ensure that the CES is working properly, and the HCCSC Board's Coordinated Entry Committee oversees the operations of the CES as a whole. The HCCSC Board must approve any changes to the *CE Guide*, the *Eligibility and Prioritization Policies*, and any other policies governing the CES. However, where existing policies lack necessary administrative details, HMIS and Hotline staff, working with the Collaborative Applicant and the Quality Assurance Workgroups, may develop written rules to describe in more detail how the CES will interpret and apply Board-approved policies.

D. Quality Assurance Workgroups.

1. Various Groups and Their Composition. Every provider participating in the CES must participate in each "Quality Assurance Workgroup" relevant to its projects. The workgroupsare:

   a. Supportive Housing (Transitional Housing (TH), Safe Haven (SH), and Permanent Supportive Housing (PSH) projects);

   b. Prevention and Rapid Re-housing (RRH);

   c. Emergency Shelters;

   d. Outreach Programs; and

   e. By Names

2. Workgroup Chairs. A representative of the Collaborative Applicant and the HMIS Program Manager will co-chair all of the workgroups

3. Frequency of Meetings. Each Quality Assurance Workgroup will meet as often as necessary to ensure the prompt resolution of any problems regarding referrals and admissions to the projects within their purview.

4. Scope of Work. It is the responsibility of the Quality Assurance Workgroups to determine whether CES policies and procedures are working fairly and effectively for the projects within their purview and for the people seeking help from those projects and to recommend improvements where needed. Among other things, the workgroups are expected to:

   a. Provide feedback on the accuracy of the Hotline's assessments of persons requesting assistance and on its prioritization of those persons and their project placements and recommend changes to improve the quality of the Hotline's decisions in these areas;

   b. Provide feedback on procedures governing intake, assessment, referral, and project admission and recommend changes where appropriate;

   c. Provide feedback on policies governing eligibility for projects as well as on policies governing exclusion from and termination by projects and recommend changes where appropriate;

   d. As requested by the Collaborative Applicant, consider complaints made to the Collaborative Applicant about exclusions, terminations, or discriminatory treatment by projects;and

   e. Review the by-name list of persons at the top of the prioritization lists and persons that have proven difficult to serve in order to develop housing solutions for those persons. The by-name list will be discussed further in section IV.E.2.

ll. Access to the Coordinated Entry System Through the Hotline

    A.   <u>Role of the Hotline – Overview.</u> All persons seeking HCCSC help in responding to a housing crisis must contact the Hotline. Hotline staff will be responsible for:

        1.   Informing persons seeking help that the homeless system operates in accordance with policies and procedures that they can find on the HCCSC's website and that they have the right to file a complaint ("appeal") with the Collaborative Applicant if they believe they have been the victims of discrimination in the application of these policies and procedures;

        2.   Screening people to determine:

            a.   Whether they are victims of domestic violence or veterans and, therefore, eligible for services from another system of care that they may wish to contact to maximize their options; and

            b.   Whether they have the resources to obtain shelter and housing without entering the homeless system;

        3.   Diverting from the homeless system persons who do not meet the threshold criteria for eligibility to receive help from the system;

        4.   Conducting a formal intake and assessment of those who cannot be diverted from the homeless system and prioritizing them for service;

        5.   Obtaining consent from people entering the homeless system to store and share their personal information for purposes of assessing their needs and connecting them through the coordinated entry process (CEP) to appropriate shelter, housing, and services.

            a.   Verbal consent delivered over the phone is sufficient to constitute consent for these purposes as long as it is memorialized in writing by Hotline staff at the time it is received. However, any project that meets in person with a project participant or potential project participant must also obtain written consent signed by that person to store and share with others the personal data it collects as well as data it obtains from the CES.

            b.   Under no circumstances will CES services be denied to any persons who refuse to allow their data to be shared unless a federal statute requires collection, use, storage, and reporting of the persons' personally identifiable information as a condition of program participation.

    B. <u>Marketing the Hotline.</u> The HCCSC will take the following steps to market the Hotline to all eligible persons regardless of race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, or marital status:

        1.   Prominently publicize on its website the role of the Hotline in linking persons experiencing housing crises to housing and supportive services, both in English and in Spanish, along with contact information for the Hotline, including a phone number, e-mail address, and FAX number;

2. Ensure that, at least once a year, information about the role of the Hotline and contact information for the Hotline is shared with all police departments and emergency services agencies in Stark County, with the 2-1-1 information and referral service covering the county, and with all schools, hospitals, jails, city councils, county commissioners, township trustees, and mayors' offices in the county;

3. Identify organizations that serve individuals with language barriers that may prevent them from accessing information about the Hotline and ensure that, at least once a year, they receive information about the role of the Hotline and contact information for the Hotline; and

4. Identify organizations that target services to populations protected by fair housing and equal access laws and ensure that, at least once a year, they receive information about the role of the Hotline and contact information for the Hotline.

C. Access for Non-English Speakers and Others with Communication Challenges.

1. Initial Access by Phone, E-mail, or FAX. Anyone seeking help through the Hotline to solve a housing crisis must make initial contact with the Hotline by phone, e-mail, or FAX.

2. Identifying Need for Communication Assistance. Hotline staff must respond promptly to people contacting them for help and determine in all cases whether the persons requesting help require special assistance in communicating their needs and completing the Hotline's standardized assessment process.

3. Addressing Need for Communication Assistance. It is the responsibility of the Hotline staff to do the following to address the needs of individuals who cannot communicate effectively without special assistance:

   a. Maintain a list of resources available to provide translation services or other communication services or devices to individuals who need help in communicating with Hotline staff;

   b. Use those resources as appropriate to eliminate any barriers to communication with people contacting the Hotline; and

   c. As much as possible, honor the preferences of the person requesting help in selecting the services or devices that will be used to eliminate communication barriers.

D. Access for People Encountered by Street Outreach Projects.

1. Responsibilities of Street Outreach Program Staff to Facilitate Access.

   a. Responsibilities in General. Street outreach projects funded by CoC or ESG grants and other outreach programs cooperating with the HCCSC will encourage homeless people they encounter on the streets or in other places not meant for human habitation to register with the Hotline. In addition, outreach staff will facilitate registration by providing the homeless people they encounter with the means to contact the Hotline by phone, e-mail, or FAX and

working with them to complete the CEP.

     b.   Responsibilities When Homeless Person Declines to Contact the Hotline. When outreach staff cannot persuade a person living on the street or in another place not meant for human habitation to register with or undergo assessment by the Hotline, they will make every effort to collect basic information about the person (at least their name and date of birth) and share that information with Hotline staff so that staff can create an HMIS record of the person's episodes of homelessness. In addition, as long as the person remains on the street or in place not meant for human habitation, outreach staff will attempt to contact the person at least weekly and report those contacts to the Hotline.

  2. Responsibilities of Hotline Staff. In dealing with homeless persons encountered by street outreach, the Hotline will follow the same policies and procedures it follows in dealing with other persons who make contact with the Hotline, using outreach staff as needed to facilitate completion of the CEP. In the case of homeless persons who decline to complete the CEP even with the help of outreach staff, as long as the Hotline has sufficient information to clearly identify those persons, it will preserve records of their homeless episodes as reported by outreach staff for at least three (3) years.

E.   Hotline Hours and Access to Emergency Services After Hours. The Hotline staff is on duty from 8:30 a.m. to 4:00 p.m., Monday through Friday. During hours when the staff is not on duty, calls to the Hotline will be answered by the crisis intervention staff. Crisis intervention staff will maintain current information about homeless outreach services, shelters and other emergency services and share that information with callers experiencing an urgent housing crisis. For all persons attempting to contact the Hotline after hours, crisis Intervention staff will collect names and contact information and share them with Hotline staff on the next day Hotline staff is on duty. It will be the responsibility of the Hotline to contact these persons for formal intake and assessment as soon as possible after it receives their names and contact information from crisis Intervention staff.

III. The Coordinated Entry and Assessment Process

A.   Screening for Presence of Domestic Violence, Dating Violence, Sexual Assault, Stalking and Human Trafficking. When people initially contact the Hotline for help, Hotline staff will ask whether they are fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and whether they are victims of human trafficking.

    1. Cases of Positive Screening for Domestic Violence, Dating Violence, Sexual Assault, Stalking. In cases where persons contacting the Hotline report that they are (1) fleeing domestic violence, dating violence, sexual assault, or stalking and are in imminent danger or (2) are experiencing homelessness to which domestic violence, dating violence, sexual assault or stalking has been a contributing factor, Hotline staff will ask the callers their preferences and refer them, if they prefer, either to Domestic Violence Project, Inc. (with shelters in Canton and Massillon) or to the Alliance Area Domestic Violence Shelter, informing them that these organizations specialize in serving people with current safety concerns. If eligible persons are unwilling to contact a domestic violence project, the Hotline staff will proceed to conduct intake and assessment following the policies outlined below in Section III.C.3.

2. <u>Cases of Positive Screening for Human Trafficking.</u> In cases where persons report that they are victims of human trafficking, Hotline staff will ask whether they wish to be referred to Domestic Violence Project, Inc. (with shelters in Canton and Massillon), informing them that this organization specializes in serving survivors of human trafficking. If eligible persons are unwilling to contact Domestic Violence Project, Inc., the Hotline staff will proceed to conduct intake and assessment following the policies outlined below in Section III.C.3.

B. <u>Screening for Diversion and Referral to Other Resources.</u>

1. Diversion Due to Lack of Eligibility for HCCSC Services. Before conducting an intake on persons contacting the Hotline for help, Hotline staff will collect, at a minimum, their names, dates of birth, and the last four digits of their social security numbers, along with information gathered through a diversion questionnaire which is designed to determine whether the persons meet the threshold criteria for receiving assistance from the HCCSC's homeless programs. Persons only meet those criteria if:

   a. They are homeless within the meaning of 24 CFR Section 578.3 or if they are at risk of homelessness and are potentially eligible for any of the prevention or shelter diversion programs that operate under the auspices of the HCCSC and participate in HMIS; and

   b. They lack other resources or support networks to help them solve their immediate housing crisis.

2. <u>Referral to Mainstream Programs and Resources.</u> If an initial screening reveals that people seeking help from the HCCSC do not meet threshold eligibility criteria for HCCSC programs and services, Hotline staff will provide them with information about mainstream programs and resources they can contact for help. To that end, the Hotline will maintain and annually update a list of mainstream programs and resources in Stark County that could be useful to people experiencing problems of housing instability. In all cases in which callers are safely housed, the Hotline staff will urge them to stay where they are as long as possible and work independently with appropriate mainstream resources to stabilize their housing.

C. <u>Formal Intake and Standardized Assessment of People Not Diverted from the HCCSC</u>

1. <u>Formal Intake – In General.</u> If a person lacks alternatives to entering the homeless system, the Hotline staff will conduct a formal intake, collecting all the HUD-required universal data elements, program-specific elements, and other data required by federal regulations or HCCSC policies, and entering that data directly into HMIS.

2. <u>Standardized Assessment – In General.</u>

   a. <u>Assessment Tools.</u> For all persons admitted to the homeless system through formal intake, the Hotline staff will conduct an assessment using the appropriate Service Prioritization and Assistance Decision Tool (SPDAT): the SPDAT for individuals, the Family SPDAT for persons presenting as a family or single household, or the Youth SPDAT.

b. <u>Right to Refuse to Answer Assessment Questions.</u> Persons undergoing assessment may refuse to answer any of the questions on the assessment without forfeiting their right to assistance from the HCCSC. However, if the failure to answer particular questions jeopardizes a person's eligibility for certain types of housing or services available through the HCCSC, the individual administering the assessment must advise people refusing to answer those questions that, in the absence of an answer, they may not qualify for housing or services for which they could otherwise be eligible.

c. <u>Training to Administer Assessments</u>. Any person who administers a SPDAT assessment must have received training within the previous 12 months from an instructor who has followed the protocols established by Org_Code Consulting, Inc., SPDAT's developer, to become qualified to train others to administer SPDATs. By the end of January of each year, the Collaborative Applicant will publish on the HCCSC's website the year's schedule of trainings that will satisfy this requirement.

3. <u>Special Intake Protocols for Victims of Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking.</u>

a. <u>People Not Admitted to Domestic Violence Projects.</u> In cases where domestic violence projects cannot serve people who have contacted them for help, the projects will refer the people to or, in the case of people referred to the project by the Hotline, refer them back to the Hotline and work with the Hotline as necessary to facilitate their completion of the CEP.

b. <u>Participants in Domestic Violence Projects.</u> For people referred by the Hotline and admitted to a domestic violence project who need additional homeless services, the domestic violence project will help them contact the Hotline and work with the Hotline as necessary to facilitate their completion of the CEP as soon as possible after they are admitted to the domestic violence project.

c. <u>Special Rules to Ensure Safety and Confidentiality</u>.
In all cases where CES intake is conducted for persons reporting that they are victims of domestic violence, dating violence, sexual assault, stalking or human trafficking, the following rules will apply:

   i. The Hotline staff will collect no more information about those persons than they are comfortable sharing and will make the accommodations necessary to preserve the safety of those persons and protect their identity and location from disclosure;

   ii. The Hotline staff will contact staff from domestic violence projects for advice in any instances in which they are unsure about the best course of action to take to keep victims of domestic violence, dating violence, sexual assault, stalking or human trafficking safe; and

   iii. The effective date and time of the intake will be the date and time that the victims of domestic violence, dating violence, sexual assault, stalking or human trafficking first contacted the Hotline even if, at the time of the initial contact, they declined to complete the CEP and opted instead to work exclusively with a domestic violence project.

4. Special Intake Protocols for Veterans.

    a. Hotline Duties. As part of its initial screening of persons seeking assistance, the Hotline will determine whether those persons are veterans. If they are veterans, the Hotline will:

        i. Give them contact information for the Veterans Service Commission of Stark County and the Veterans Administration's Community Resources and Referral Center in Akron and advise them to contact those agencies to find out what housing and services are available to them as veterans; and

        ii. After conducting a full intake and assessment, notify the HCCSC's Veterans' Coordinator of the intake.

    b. Duties of Veterans' Coordinator. The HCCSC's Veterans' Coordinator will maintain a by-name list of all homeless veterans in Stark County and will coordinate efforts with the Veterans Service Commission and the Veterans Administration to:

        i. Determine the eligibility of those on the list for special benefits and resources that are available to help veterans secure stable, affordable housing;

        ii. Provide them with necessary assistance in accessing those special benefits and resources; and

        iii. Maximize use of the special benefits and resources available to veterans and, if no such benefits and resources are available, other resources to house the veterans as quickly as possible.

IV. Use of Central Prioritization Lists to Refer and Select Persons for Shelter, Housing, and Services

A. Hotline's Role in Maintaining Central Prioritization Lists. The Hotline will maintain central prioritization lists of persons awaiting shelter diversion services, prevention services, emergency shelter, and housing and assign places on the appropriate lists to persons registered for services in the order prescribed by HCCSC's *Eligibility and Prioritization Policies*.

B. Prioritization List for Prevention Services. If, based on information collected during intake, the Hotline staff determines that someone is at risk of losing their housing within the next 21 days and is likely to meet other eligibility criteria for available prevention services, the Hotline staff will place the person on a prioritization list for prevention services. In filling vacancies for services, prevention projects will choose people from this prioritization list in the order of their rank on the list.

C. Prioritization List for Pilot Shelter Diversion Project. If, based on information collected during intake, the Hotline staff determines that someone may be eligible for the shelter diversion pilot project launched by CommQuest in 2017, the staff will place the person on a shelter diversion list, discuss the pilot project with the person, and instruct the person to send income verification to the project to indicate an interest in enrolling in the project.

D. Prioritization for and Referrals to Emergency Shelters.

    1. Referrals from the Hotline. All shelters will update their inventories of available beds as changes occur. Based on these inventories, the Hotline will refer eligible persons to available shelter beds when they register with the Hotline or, if no shelter beds are immediately available, place them on a shelter prioritization list from which they will be referred to shelters in the order in which they are ranked. Participating shelters will not accept referrals from any sources other than the Hotline except during hours when the CES is closed.

    2. Referrals from Other Sources When the CES is Closed. The following rules apply when shelters accept referrals from sources other than the Hotline when the CES is closed:

        a. Within 24 hours after the CES has reopened, a shelter must notify the Hotline of any person it accepted when the CES was closed and facilitate coordinated entry for that person.

        b. No shelter may guarantee ongoing shelter to any person accepted from other sources during hours when the CES was closed.

    3. Documentation by Shelter of Refusal to Admit or Retain Referred Client. In the event that a shelter refuses to admit a person referred to it or expels a client after admission, it must note the reasons for its action in the CES database.

FE. Prioritization and Selection for Housing.

    1. Creation of Prioritization Lists for Housing. For each category of housing available through the HCCSC, the Hotline will create a list of people awaiting housing that will be accessible online to participating housing projects. If, based on information gathered during intake, Hotline staff determines that someone is likely to be eligible for housing from one or more HCCSC projects, the staff will put the person on the appropriate housing prioritization list. Before doing so, however, Hotline staff will:

        a. Advise the person to vigorously pursue other options if, based on their low SPDAT scores or other factors influencing their prioritization, they are not likely to receive a housing placement within one year; and

        b. If the person hopes to qualify for permanent supportive housing (PSH), counsel that person to:
           i. Download a verification of disability form (VOD) from the HCCSC's website or obtain a VOD from the Collaborative Applicant; and

           ii. Identify a suitable licensed professional to complete and sign the VOD and fax it to the Hotline in accordance with directions that appear on that form.

    2. Direct Referral Procedures

        a. By-Names List Meetings. Led by the CES staff, providers will be expected to meet on a weekly basis for the By-Names List meeting. At these meetings, an inventory of vacancies will be reported by each housing provider and direct referrals will be provided by CES staff as the group

reviews the by-names list of persons at the top of the prioritization lists. CES staff will verify that actions taken in between the weekly meetings by housing providers adhere to the Coordinated Entry policies and procedures. Case conferencing will also be conducted for any challenging cases. Anyone being placed into a PSH or RRH unit must be verified and approved at a By-Names List meeting or, if an eligible household is being entered into a project between meeting dates, via CES directly.

Case Conferencing. In situations where there is a challenge with placing or transferring a household a meeting may be called to clarify with the individual or family seeking housing the options available to them and the repercussions that will result due to their decline of two housing options. At a minimum, the CES, a housing provider, and the individual/family to whom the case pertains will attend the case conferencing.

3. <u>Exclusive Use of Prioritization Lists by Projects to Accept Participants.</u> To the extent they can do so without violating applicable legal or funding restrictions, RRH, TH, SH, and PSH projects receiving Continuum of Care, Emergency Solutions Grant, or Ohio Development Services Agency funds as well as other cooperating projects must offer placement only to persons on the appropriate prioritization list as referred by CES directly or at a By-Names List meeting and only in the order in which they are ranked on that list. (Certain exceptions to this general rule are explained below in this guide and in HCCSC's *Eligibility and Prioritization Policies*.)

6. <u>Duty of Housing Projects to Update the Hotline and the Prioritization Lists.</u>

1. <u>Informing the Hotline of Vacancies.</u> When vacancies occur, housing projects must report them to Hotline staff within two (2) working days by secure means and inform the Hotline when the vacated housing unit will be available for occupancy.

2. <u>Using the Prioritization Lists and Documenting Interactions with Prospective Participants</u>.

   a. <u>Direct Access to the List for Providers</u>. All housing projects will have direct access to the central prioritization lists and to relevant information regarding persons on those lists so they can identify the persons with highest priority for their projects and accept a direct referral from CES staff.

   b. <u>Documenting Activities with Clients</u>. Projects will document in a manner prescribed by the Hotline their activities with any person on the central prioritization lists so the history of that person's interactions with participating projects is available to all other participating projects and to Hotline and HMIS staff. Activities to be documented include, but are not limited to, ongoing efforts by projects to find housing for a person; steps taken to evaluate a person for a current project vacancy, as further described in Section V.D. of this guide; and decisions to offer or deny a vacancy to a client.

   c. <u>Presenting People with One Housing Option at a Time</u>. In cases where one provider ("the first provider") has documented either attempts to contact a person or interactions with a person in preparation for admitting that person to a project, other providers with an opening will move to the next available person on the prioritization list and contact CES for a direct referral. If the first provider does not ultimately admit the person to its project, it will

document the reason why and date and initial the explanation. Other projects are then free to contact the person about their next vacancy after confirming with CES staff.

G.H. Consequences of Inability to Reach Person on the Prioritization List or Certify Eligibility for Housing

1. Bypassing Persons Awaiting Emergency Shelter Who Cannot be Reached. If, after using all available contact information to reach the most highly ranked person on the shelter prioritization list, the Hotline is unable to notify that person of a shelter vacancy, it will immediately offer the vacancy to the next person on the list.

2. Bypassing Persons Awaiting Housing Who Cannot be Reached or Certified as Eligible. If, within 5 business days after a vacancy occurs, a project has been unsuccessful in contacting or certifying the eligibility of a more highly ranked person or persuading that person to accept a placement despite diligent efforts, it may offer the vacancy to a lower-ranked person whose eligibility has been confirmed with CES staff. "Diligent efforts" must be documented and must include, at a minimum, two attempts to use all available contact information and resources to notify the person next in line for a vacancy and make reasonable accommodations to enable that person to complete the certification process.

3. Consequences When Persons Cannot be Reached for Placement or Verification of Continuing Need for Help

    a. Consequences of Inability to Reach Persons for Program Placement. If, after making the efforts described in the two preceding paragraphs to contact the person who is next in line for placement, the Hotline or a project is unable to make contact, the person will be classified as "inactive," and no further efforts will be made to notify that person when shelter beds or housing units become available. In such cases, projects will document inactive status in the manner prescribed by the Hotline.

    b. Consequences of Inability to Reach Persons to Verify Continuing Need. If, after being on a prioritization list for 4 months, people have not been contacted by a project for possible placement, the Hotline staff will try to contact them to verify their homeless status and confirm their ongoing need for HCCSC assistance. If the Hotline is unsuccessful in contacting them after 2 documented attempts extending over the course of at least 2 weeks and using all available contact information, it will reclassify the persons as "inactive." By January 31, 2019, the HCCSC hopes to meet its goal of reducing the wait on prioritization list to no more than 60 days.

    c. Reactivation of People Removed from the Prioritization List.

        i. If, within 6 months after being classified as inactive, people contact the Hotline to confirm their ongoing need for HCCSC assistance, the Hotline will return them to the appropriate prioritization lists, assigning them ranks based on an updated SPDAT score and on the date and time of the intake that resulted in their original placement on the list.

ii. If people contact the Hotline more than 6 months after they have been removed from the prioritization due to the inability of the Hotline or providers to contact them, they will be treated as new applicants for assistance.

H. Consequences of Refusing Referral or Placement.

1. Removal from the Prioritization List. During the CEP, people will have the opportunity to express their preference to be sheltered or housed in one or more areas of Stark County. In offering people shelter or housing, the Hotline and participating projects will honor expressed preferences to the best of their ability. However, people will be classified as "inactive" and removed from the prioritization list in the event they have refused two project placements.

2. Reactivation of People Removed from the Prioritization List. If, six months or more after being removed from the prioritization list pursuant to Section IV.H.1, people wish to be reinstated on the list, they may register with the Hotline and undergo intake and assessment in accordance with the procedures set out for new applicants.

I.J. Consequences of Failure to Appear at Shelter.

1. Unless they are working, people referred to a shelter by the Hotline must present themselves at the shelter on the day they are referred. If, however, they are working and, because of work, are unable to get to the shelter on the day they are referred, they will maintain their right to a place at the shelter if they present themselves for admission no later than the following day.

2. A person's failure to appear at a shelter by the deadline identified above will constitute a refusal of service.

V. Procedures for Admitting People to Projects

A. Duty to Follow Eligibility Criteria and Other HCCSC Rules.

As reflected in the HCCSC's policy entitled *Adherence to Approved Eligibility and Exclusionary Rules,* in accepting referrals from the CES and admitting them to their projects, housing providers must comply with the eligibility criteria approved by the HCCSC for those projects. In addition, to the extent allowed by their funding sources, they must adhere to the system-wide eligibility criteria outlined in the HCCSC's *Eligibility and Prioritization Policies* and HCCSC's policies mandating adherence to Housing First principles and fair housing and equal access laws.

B. Duty of Providers to Interview Prospective Project Participants and Collect and Upload Documents to Prove Their Eligibility.

Before admitting people to a project, project staff must meet them to conduct a personal interview and, as necessary, collect the documentation required to certify their eligibility for the project. Every project must follow the recordkeeping requirements specified in HCCSC Policy No. F-10. If, when verifying a person's eligibility for a project, project staff finds that the documentation necessary to confirm eligibility is not already uploaded in HMIS, project staff must upload the documentation to ensure its availability to all HMIS users.

C. Corrections to Standardized Assessment and HMIS Data.

    1. <u>Corrections to HMIS Data.</u> If, while certifying a person's eligibility for a project or at any other time, a housing, shelter, or service project learns that any information about the person that was entered in HMIS is incorrect, it will enter the correct information directly in HMIS and notify HMIS staff in writing within one working day.

    2. <u>Reassessment and Reprioritization.</u> If, while certifying a person's eligibility for a project or at any other time, a housing, shelter, or service project learns that material information obtained during the person's original assessment has changed, the project will complete a new assessment in HMIS and notify HMIS staff in writing within one working day. In cases where the new information suggests that someone is ineligible for a type of project for which the person is being considered or that the person's need for housing assistance is much less or greater than previously supposed, Hotline staff will reassess the person's eligibility for housing interventions as well as his/her placement on the prioritization list.

D. <u>Duty of Housing Projects to Report on Person Being Considered for Vacancies.</u>

A housing provider must take the following steps when filling a vacancy:

    1. Request a referral from the CES. CES will provide up to three referrals per request;

    2. Signify that a person is being considered for a vacancy by placing a dated and initialed notation documenting eligibility and refusal or acceptance status on the applicable prioritization list.

E. <u>Reviews in Cases of Apparent Violation of Admission Rules.</u> If it comes to the attention of CES staff or other persons using the CES database that a housing project has violated CoC policy regarding referrals, they will report the matter to the Collaborative Applicant. If the Collaborative Applicant finds that the project has not acted in accordance with these policies, it will take corrective action against the project and report the violation to the Recipient Approval and Evaluation Committee to ensure that the violation is considered in the scoring and ranking of the project for CoC and other grant funds.

VI. Procedures for Transferring Project Participants from one PSH Project to Another

A. <u>Circumstances Justifying Transfers.</u> Permanent supportive housing (PSH) project participants may request a transfer to another PSH unit when the participants no longer meet the eligibility criteria for the project that currently houses them or when their current housing unit no longer satisfies their needs. Appropriate reasons for granting a transfer include the following:

1. Victims of domestic violence, ==dating violence, sexual assault, or stalking== who are eligible for emergencytransfers;

2. ==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;==

3. ~~Other individuals whose residence in their current units poses an imminent dangertothemselves or others;~~

4.3. Those with disabilities that cannot be accommodated in their current units;

5.4. Those whose transfers are warranted by a change in the size or composition of their households; Or

6.5. In the case of a PSH program closing.

B. Procedures for Effecting Transfers. The following procedures will be observed in effecting transfers, regardless of whether they are transfers within the same project, between housing projects operated by the same agency, or between projects operated by different agencies:

1. Any PSH project serving a participant who is seeking a transfer (the "transferring project") to another PSH unit must:

   a. Complete and submit to the Hotline a form in which it explains the participant's reasons for requesting a transfer; outlines the steps it has taken to address the participant's needs; and, if applicable, explains any reasons it has for objecting to the transfer;and

   b. Except in cases where the participant qualifies for an emergency transfer due to domestic violence or imminent danger of other violence, complete a new assessment for the participant and upload it in HMIS.

2. The Hotline will review the transfer request with the current project, determine whether the transfer is justified by any of the reasons specified in Section VI.A., and, if justified, place the participant requesting the transfer at the top of the PSH prioritization in the priority specified in Section IX.B. of the *Eligibility and Prioritization Policies*.

C. Effect of New SPDAT Score on Eligibility for Housing. Under no circumstances will a SPDAT score resulting from the re-administration of the SPDAT pursuant to Section VI.B.1.b. constitute cause for treating the client as no longer eligible forPSH.

D. Consequences of Refusing a Transfer Placement. Clients may turn down two transfer options. In accordance with Section IV. H. 1 regarding consequences of refusing referral or placement, comparable actions will be taken in the event that a client declines two suitable transfer options by moving them to inactive status on the prioritization list. "Suitable" options will be determined by the

Quality Assurance Workgroup, at a By Names Meeting or directly by CES staff. In cases where VAWA is applicable the HCCSC's D.8 *Policy Governing Emergency Transfers for ~~Victims of Domestic Violence~~ VAWA Beneficiaries* will apply.

E. Reactivation of People Moved to Inactive Due to Decline of Transfer Placements. Clients may contact the Hotline following a decline of two transfer placements to be made active on the prioritization list. However, they will not be placed back on the transfer list at that time.

5. **Procedures for Appealing Coordinated Entry Actions or Decisions**

   A. The Right to Appeal. Persons who have been adversely affected by a decision or action that violates the policies or procedures outlined in the *CE Guide* or in any other policies or procedures governing the CES may appeal the decision or action to the HCCSC's Collaborative Applicant. "Other policies and procedures" include, but are not limited to:

      1. *Policies Governing Eligibility and Prioritization to Receive CoC Assistance and Standards for Administering Assistance, aka, HCCSC's Eligibility and Prioritization Polices (*Policy D.3);

      2. *Adherence to Eligibility and Exclusionary Rules* (Policy D.4/F.4);

      3. *Adherence to Housing First Principles for Admitting and Terminating Participants* (Policy D.5/F.5);

      4. *Fair Housing and Equal Access Standards (*Policy D.6/F.6).

   B. How to File an Appeal. Persons may exercise the right to appeal the actions or decisions described in Section VII**.** A. by completing an HCCSC Complaint Form and following the instructions on that form to submit it to the Collaborative Applicant. The form may be found on the HCCSC's website under *How to Get Help*.

   C. Procedures for Deciding Appeals

      1. Steps to be Taken by the Collaborative Applicant

         a. Within 5 working days after receiving a completed HCCSC Complaint Form, the Collaborative Applicant will contact the appellant to gather any additional information needed to help clarify the grounds for the appeal.

         b. Within 7 working days after receiving a completed HCCSC Complaint Form, the Collaborative Applicant will contact the agency or agencies responsible for the decision or action being appealed and gather any information needed to clarify the reasons underlying the decision or action.

         c. Within 10 working days after receiving a completed HCCSC Complaint Form, the Collaborative Applicant will prepare a written decision on the appeal and deliver it by mail, e-mail, or in person both to the appellant and to the agency against whom the appeal was filed. That written decision will explain the reasons underlying the conclusions reached, and, in the event that the decision is

favorable to the appellant, the corrective action that will be taken to rectify anywrongdoing.

2. Postponement of Action by the Collaborative Applicant for Reconsideration by the Appellee Agency. In the event that an agency accused of wrongdoing has in place a process thatpeople may use to resolve their complaints against the agency, appellants will be required to pursue that process first before the Collaborative Applicant will act on their appeals. However, in no event will the Collaborative Applicant postpone commencing its own review of an appeal longer than 15 working days following its receipt of a completed Complaint Form.

3. Consultation by Collaborative Applicant with Quality Assurance Workgroups and Coordinated Entry Committee. As time permits and as the case warrants, the Collaborative Applicant will consult with appropriate Quality Assurance Workgroups and the Coordinated EntryCommittee before making a final judgment on complaints, especially complaints that mayreflect:

   a. Misinterpretations or misapplications of CES policies and procedures;

   b. The need for reconsideration or refinement of CES policies and procedures; or

   c. The existence of a persistent problem with one or more participatingprojects.

D. Notice of Rule Violations to Recipient Approval and Evaluation Committee. If, when judging an appeal, the Collaborative Applicant determines that a project has violated HCCSC policies, it will notify the Recipient Approval and Evaluation Committee of the violations. As specified by Board-approved policies, that committee will take the violations into account in scoring and ranking the project for CoC funding and endorsing it for funding from other sources.

VIII. Coordinated Entry System Evaluation and Improvement

A. Quality Assurance Workgroups. As described more fully in Section I.D. of the *CE Guide*, CES and project staff will use Quality Assurance Workgroup meetings to analyze and propose improvements to the CES on an ongoing basis.

B. Obtaining Feedback through Focus Groups. In the first quarter of each year, the HCCSC will also conduct focus groups to collect feedback on the CES from users of that system. Those focus groups will include at least three groups consisting of project participants who have experienced CES intake, assessment, or referral during the previous calendar year.

C. Selection of Focus Group Members. Members of the project participant focus groups will include all those who respond affirmatively to an invitation to attend any of three sessions that will be held in different areas of the county at times and places that are likely to be convenient for a large number of those invited. Invitations will be sent to all individuals with an e-mail address who have experienced CES intake, assessment, or referral during the previous calendar year.

D. Choice of Focus Group Leaders. All focus groups will be facilitated by the Collaborative Applicant or a facilitator designated by the Collaborative Applicant. Those facilitators must be familiar with the CES but may not be employees of participating projects, project participants, or members of

the CES staff.

E. <u>Development of Focus Group Questions.</u> Working with the Coordinated Entry Committee, the Collaborative Applicant will develop lists of questions to be posed to the focus groups. In formulating these questions, the Collaborative Applicant and the committee will take pains to ensure that:

1. The questions solicit sufficient information to enable them to evaluate the quality and effectiveness of each facet of the CES experience for all users of that system; and

2. The questions provide opportunities for respondents to give their perspectives on how the system is functioning as a whole along with their suggestions for improving the system.

F. <u>Protecting the Source of Information and Opinions Gathered During Focus Groups.</u> At the beginning of each focus group session, group leaders will inform those present that:

1. They intend to share information and opinions gathered during the session with individuals who are responsible for analyzing and improving the system; and

2. To the best of their ability, they will protect the identity of the individuals whose information or opinions they share.

3. Members of project participant focus groups need not share their names if they prefer not to so.

G. <u>Using Focus Groups Feedback to Improve the System.</u>

1. Within two weeks after each focus group session, the session leaders will:
    a. Summarize in writing and share with the Collaborative Applicant and the Coordinated Entry Committee the information and opinions they gathered during the focus group; and

    b. In the same document, list any recommendations for changes to the CES that they conclude are warranted based on the information and opinions they have summarized.

2. Within three months after the Collaborative Applicant and the Coordinated Entry Committee have received the focus group leaders' recommendations, they must share the recommendations with the HCCSC Board and explain in writing what, if any, changes to the CES they will be proposing in response to these recommendations.

IX. Privacy and Security of Coordinated Entry Data

All CES staff and all staff of participating projects who have access to CES data are subject to the same restrictions on their use of that data that apply to HMIS users. To ensure that, before they obtain access to CES data, CES and project staff understand the applicable privacy and security restrictions, they must undergo training

delivered by experienced CES staff and sign a user agreement that outlines the restrictions and attests to the fact that they have received training on the proper care and handling of CES data.