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

Members Present
Maria Heege
Lynne Dragonier
Kim Kroh
Lisa Warden
Danelle Lightner
Shannon McMahon Williams
Rollin Seward
Shirene Starn-Tapyrik
Beverly Lewis
John Aller
Marty Chumney

Members Not Present
Captain John Gabbard
Cheli Curran
Cathy Jennings
Julie Sparks
JoAnn Breedlove

SHNI
Marcie Bragg
Melissa Terrell

I. Welcome and Approval of May Meeting Minutes
At 9:38 a.m., Marcie Bragg, Board Chair, called the meeting to order and welcomed everyone.

II. Conflict of Interest Reminder
Marcie reminded the Board members of the conflict of interest policy and asked Homeless Continuum of Care of Stark County (HCCSC) Board members to abstain from voting, when necessary, to avoid any conflicts.

III. Review and Approval of the October 8, 2019 Meeting Minutes
Motion: Marcie requested a motion to approve the Homeless Continuum of Care of Stark County Board meeting minutes for the month of October as presented. Shirene moved to approve. Danelle seconded and the motion was carried by a unanimous vote of all members present.

IV. Review and Approval of HMIS Policy Revision
   a. E.2 Agency Partner Agreement (See Attachment 1)
      i. Board members reviewed the HCCSC E.2 Agency Partner Agreement (page 2), #12, regarding participant’s revoking consent for release of information. Additional agencies, such as Emergency Assistance (EA) providers, are considering the use of the HCCSC’s Homeless Management Information System (HMIS) for tracking emergency assistance provided to participants. Agencies are able to view participant information entered into the HMIS by other agencies; the recommendation is to change the language in the policy regarding the participant’s right to revoke their consent to release information and the agency’s responsibility once the participant revokes their consent.
      
      Motion: Marcie requested a motion to approve the recommended policy revision of the Homeless Continuum of Care of Stark County E.2 Agency Partner Agreement. John motioned to approve. Maria seconded and the motion was carried by a unanimous vote of all members present.

V. Review and Approval of Coordinated Entry Policy Revisions
   a. D.2 HCCSC Coordinated Entry Guide (See Attachment 2)
i. HCCSC Board members reviewed the Coordinated Entry Committee’s recommendation for revisions to policy D.2 under IV.G.3.e (page 11) regarding current practices for re-administering the SPDAT assessment. Currently, applicants will be placed back on the Prioritization List (PL) without re-administering the SPDAT assessment if the original SPDAT assessment was conducted less than 6 months prior to the reactivation date.

**Motion:** John motioned to approve the Coordinated Entry Committee’s policy revision recommendation for D.2 Coordinated Entry Guide. Rollin seconded and the motion was carried by a unanimous vote of all members present.

ii. HCCSC Board members reviewed the Coordinated Entry Committee’s recommendation for revisions to policy D.2 under IV.I.1 & 2 (page 12) regarding emergency shelter no-shows. The Stark Housing Network, Inc. (SHNI) has held bi-monthly Emergency Shelter (ES) Workgroups since Katie Kitchin of Corporation of Supported Housing (CSH) facilitated a Low Barrier Emergency Shelter discussion on March 20th, 2019. The ES workgroup forwarded recommended policy revisions to the Coordinated Entry Committee for discussion and recommendation to the Board for final approval. The policy revision request will reduce the need to hold beds open for applicants that no-show who might not be literally homeless, and to ensure applicants that are literally homeless have a shelter bed.

**Motion:** Shirene motioned to approve the Coordinated Entry Committee’s recommendation for the D.2 Coordinated Entry Guide. Lisa seconded and the motion was carried by a unanimous vote of all members present.

b. D.3 Policies Governing Eligibility and Prioritization to Receive CoC Assistance and Standards for Administering Assistance (See Attachment 3)

i. HCCSC Board members reviewed the Coordinated Entry Committee’s recommendation for revisions to policy D.3 Policies Governing Eligibility and Prioritization to Receive CoC Assistance and Standards for Administering Assistance regarding qualifying for eligibility in a Permanent Supportive Housing (PSH) project. Representatives of the SHNI participated in a Department of Housing and Urban Development (HUD) eSNAPs conference call training with, Ebony Rankin, and found that the HCCSC policy did not comply with HUD regulations for Dedicated and Dedicated Plus units. The HCCSC policy indicated that only an adult could be the qualifying disabled person in the household; during the conference call training, it was indicated that a child could also qualify for the disabling condition. After an Ask A Question (AAQ) was submitted to HUD and the Coordinated Entry Committee thoroughly discussed, members made a recommendation to add language to the policy to be in compliance with HUD regulations. The policy revision recommendation will not affect the current practices of the HCCSC.

**Motion:** John motioned to approve the Coordinated Entry Committee’s policy revision recommendation for the D.3 Policies Governing Eligibility and Prioritization to Receive CoC Assistance and Standards for Administering Assistance. Lynne seconded and the motion was carried by all members present except for Shirene, whom abstained. Shirene has Dedicated Plus projects and abstained from the vote to avoid a potential conflict of interest.

At 10:14am, Kim Kroh entered the meeting.

VII. Review and Approval of Emergency Solutions Grant (ESG) Documents
Recipient Approval Evaluation Committee (RAEC) Chair, Shannon McMahon Williams, addressed the HCCSC Board members regarding the revisions and updates to the ESG competition documents. Many revisions to the documents were minor to reflect current information and/or terminology (please see the attachments to review all revisions to the documents). A deadline has not been set by the City of Canton for the FY2020 ESG competition; HCCSC Board members will be informed of the date as soon as it is available.
a. ESG Guidance *(See Attachment 5)*

i. A significant revision was made to the ESG Guidance (page 7) under Additional Attachments, the City of Canton requires an applicant agency’s last three months of board meeting minutes including board member’s attendance; the City has always required this information through the competition process, so this request has been added to the guidance. Another significant revision (page 11) added language for a Bidder and Contract Employment Practices Report. Agencies that are applying for more than $25,000 are required to submit the attachment correlated to Contract Employment Practices.

b. ESG Application *(See Attachment 6)*

i. There were several revisions to the ESG Application that included the Homeless Management Information System (HMIS); the HMIS is a database and there are areas of the application that do not apply to HMIS, and therefore, the RAEC has exempt HMIS from providing a response. For example, HMIS is exempt from responding to the Proposed Number to Be Served for the Capacity and Target Populations chart (page 5) and the Cost per Person Served chart (page 12); HMIS does not have the capability to determine these proposed numbers. The RAEC thoroughly discussed the need for additional information in the HMIS ESG application regarding the data reports that HMIS can produce, how the HMIS lead agency analyzes data for system improvements, and using data to identify community needs for programs. The RAEC has revised the Statement of Work question (page 7) to solicit additional information on HMIS outcomes and how this data is utilized. On page 13 and 14 of the ESG Application, there were revisions to the Additional Documents and Attachments that reflect changes made in the ESG Guidance.

**Discussion:** HCCSC Board members discussed the areas that HMIS is exempt from providing a response and determined that the HMIS line in the Capacity and Target Populations chart (page 5) be removed from the chart to avoid any confusion.

c. ESG Scoring Form *(See Attachment 7)*

i. Several revisions were made to the ESG scoring form that included the following: HMIS scoring exemptions that are uniform with revisions made to the ESG Application and ESG Guidance; adding language in the scoring criteria that clearly defines how projects will receive scores for each category (the language added reflects the Local Continuum of Care competition scoring form); and the project applications will be given a percentage of the total score for the project application ranking process.

At 10:30am, Lisa Warden left the meeting.

**Motion:** Marcie requested a motion to approve and forward to the City of Canton the revised 2020 Emergency Solutions Grant Guidance, Application, and Scoring Form with the recommended revision to the Application. Lynne motioned to approve. Shirene seconded the motion and it was carried by all members present except for John, whom abstained. John abstained from the vote due to StarkMHAR being a recipient of ESG funding.

**VIII. Review and Approval of HCCSC Strategic Plan *(See Attachment 8)***

Marcie distributed the HCCSC Strategic Plan to HCCSC Board members during last month’s meeting and requested any Board members recommendations/revisions. The Systems Performance Committee (SPC) reviewed and recommended Rapid Rehousing (RRH) and Permanent Supportive Housing (PSH) unit increase goals needed to end homelessness in Stark County. The SPC also recommended that the three year goal to add the additional units be revised to five years to offset the amount of time it takes for projects to become operational. The HCCSC Board members had a thorough discussion around community expectations for meeting unit increase goals, the ability to create community buy-in for operating dollars for these additional unit needs, and setting a realistic goal.
for the HCCSC to increase units. The SPC reviewed the previous five years to determine the historical unit increase for each project type and the HCCSC Board determined that the historical unit increase was significantly less than what is being proposed in the Strategic Plan and from the SPC. The past five year unit review only includes agencies that are entering data into the HMIS, this number did not account for units in added 2019; currently the YWCA captured RRH funding to serve 40 singles over two years and ICAN Housing has recently opened Arbor Ridge with 14 PSH units.

There were additional discussions around the need for Affordable Housing. Stark Metropolitan Housing Authority (SMHA) announced the closing of 120 Public Housing units. HCCSC Board members discussed the need for Affordable Housing and provided thoughts on connecting with outside developers, the Corporation for Supportive Housing (CSH), land banks, and Habitat for Humanity in an effort to increase Affordable Housing capacity. The City of Canton reported that there are rehabilitation efforts in the community and the City rehabs units annually; these efforts could contribute to the HCCSC’s goal of sustaining and increasing Affordable Housing units.

At 11:16am, Martin Chumney left the meeting.

**Discussion:** HCCSC Board members discussed the feasibility of meeting the unit increase goals and the need to create community buy-in for increasing units. The HCCSC Board is recommending that the PSH unit increase number be lowered to 54 units; the Board discussed that increasing PSH units by 164 in the next five years was a stretch goal.

The HCCSC Board recommend the following next steps: 1) SPC discuss the number of PSH units to be increased (there were no Board recommendations to revise RRH unit increase numbers); 2) initiate conversations with developers and/or other interested parties to increase RRH and PSH units; 3) when finalizing the Strategic Plan, creating an attachment, or justification document, that outlines specific unit goal increases including a visionary need verse actual need.

**Motion:** Marcie requested a motion to approve the five year Strategic Plan for increasing Rapid Rehousing units and revising the Permanent Supportive Housing unit need to 54 units with the understanding that an attachment or justification document will be included with the Strategic Plan. Shirene motioned to approve. John seconded the motion and it was carried by all members present.

At 11:24, Shannon McMahon Williams left the meeting.

**IX. Old/New Business**

a. Marcie asked HCCSC members if they are interested in highlighting agency accomplishments at the December Board meeting.

b. An HCCSC Members meeting will be held on Monday, November 18th at 2pm. This is the annual meeting that will review and approve the HCCSC’s Governance Charter and solicit recommendations for HCCSC Board of Directors. Additionally, there will be a Fair Housing training provided by the Stark County Fair Housing representative, Valerie Watson.

**X. Adjournment**

With no further business to be discussed, at 11:27am, the meeting adjourned.
E.2

Agency Partner Agreement
For the Stark County Homeless Management Information System (HMIS) and the Coordinated Entry System (CES)

Stark County’s Homeless Management Information System (HMIS) and Coordinated Entry System (hereinafter referred to as “the System” is a shared homeless and housing database system administered by the Homeless Continuum of Care of Stark County (HCCSC).

The signature of the Executive Director of the Partner Agency indicates agreement with the terms set forth herein before a HMIS account can be established for the Agency.

HCCSC designates the Lead HMIS Agency. Lead Agency Staff shall serve as the HMIS Administrator. In this Agreement, “Partner Agency” is a Participating Agency in the System, “Participant” is a consumer of services and “Agency” is the Agency named in this agreement.

The Agency agrees to comply with the requirements of this Agency Partner Agreement (see document E.2.) and the HSSCS HMIS Policy (see Policy E.1), Privacy Notice (see document E.4), Security Plan (see Policy E.5) and Data Quality Plan (Policy E.6).

I. Confidentiality

A. The Agency and Lead HMIS Agency shall comply with all applicable federal and state confidentiality regulations and laws that protect Participant information/Protected Identifying Information and the following:

1. The Agency shall implement and comply with the provisions of the HCCSC HMIS Privacy Notice, Section VI of the HCCSC HMIS Policy and the HCCSC HMIS Security Plan and all rules and regulations promulgated pursuant to authority granted therein (collectively and collectively with HUD, the “HUD Regulations,” as supplemented, replaced and amended from time to time).

2. The Agency shall provide a verbal explanation of the HMIS database and the terms of consent to each Participant, and shall arrange for a qualified interpreter or translator in the event that an individual is not literate in English or has difficulty understanding the consent form.

3. The Agency shall not solicit or input information from Participants into the HMIS database that is not essential to providing services or to conducting evaluation or research.

4. The Agency agrees not to disclose any confidential information received from the HMIS database to any organization or individual without proper Participant consent unless the disclosure is permitted or required by applicable law. If Agency is a HIPAA-covered entity, Agency shall comply with the disclosure requirements of HIPAA in regards to Participant information (unless Agency is a hybrid entity under HIPAA). If Agency is a 42 CFR Part 2-covered program (federal confidentiality regulations regarding disclosure of alcohol

HCCSC HMIS Agency Partner Agreement Page 1
HMIS Committee Approved
Revisions 8.15.18
HCCSC Board Approved 10.09.2018
HMIS Committee Approved 10.9.2019
HCCSC Board Approved 11.12.2019
and/or drug abuse records), Agency shall comply with the disclosure requirements of 42 CFR Part 2 in regards to Participant information. All other Agencies shall comply with the HMIS disclosure requirements as stated in the HMIS Privacy Notice (see document E.4) and Section VI of the HCCSC HMIS Policy (see policy E.1).

5. The Agency shall designate which of its staff, volunteers, and other persons will have access to the HMIS and will ensure that each such person sign an HMIS User Agreement. The Agency shall inform the HMIS Administrator in writing within one business day of changes in the Agency’s authorization of HMIS Users.

6. The Agency shall ensure that all staff, volunteers and other persons issued a User ID and password for HMIS receive basic training on applicable confidentiality requirements and provisions set forth herein.

7. The Agency understands that the database will contain all Participant information.

8. The Agency shall maintain documentation of Participant consent to participate in the HMIS database.

9. The Agency shall not be denied access to Participant data entered into the system by the Agency. Partner Agencies are bound by all restrictions placed upon the data by the Participant of any Partner Agency. The Agency shall diligently record in the HMIS all restrictions requested. The Agency shall not knowingly enter false or misleading data under any circumstances.

10. If this Agreement or that of a Partner Agency is terminated, the Lead HMIS Agency and remaining Partner Agencies shall maintain their right to the use of all Participant data previously entered by the terminating Partner Agency; this use is subject to any restrictions requested by the Participant.

11. The Agency will utilize the Participant Informed Consent & Release of Information Authorization form (see document E.3), as developed in conjunction and coordination with Partner Agencies, for all Participants providing information for the HMIS database. If the Agency is a HIPAA-covered entity and/or a 42 CFR Part 2-covered program, the Agency shall incorporate the additional elements set forth in Section 6.03 of the HCCSC HMIS Policy into the form. The Participant Consent/Information Release form, once signed by the Participant, authorizes Participant data to be entered into the HMIS database and authorizes information-sharing with HMIS Partner Agencies.

12. If a Participant revokes consent for release of information, the Agency remains responsible for ensuring that the Participant’s information that is collected after the date of revocation is unavailable to all other Partner Agencies.

13. The Agency shall keep signed copies of the Participant Informed Consent & Release of Information Authorization form and any Revocation of Consent forms for HMIS for a period of three years.

14. Services shall be provided to Participants regardless of HMIS participation provided that
E.2

Participants would otherwise be eligible for the services.

II HMIS Use and Data Entry

A. The Agency shall follow, comply with and enforce the Section VI of the HCCSC HMIS Policy, the HCCSC HMIS Privacy Notice, Security Plan and Data Quality Plan. Modifications to such documents shall be made in consultation with Partner Agencies and may be modified as needed for the purpose of smooth and efficient operation of the HMIS. HCCSC will announce approved modifications in a timely manner.

1. The Agency shall only enter program information about individuals in the HMIS database that exist as Participants under the Agency’s jurisdiction. The Agency shall not misrepresent its Participant base in the HMIS database by entering known inaccurate information.

2. The Agency shall use Participant information in the HMIS database, as provided to the Agency or Partner Agencies, to assist the Agency in providing adequate and appropriate services to the Participant.

B. The Agency shall consistently enter information into the HMIS database and will strive for real-time, or close to real-time\(^1\) data entry.

C. The Agency will not alter information in the HMIS database that is entered by another Agency with known, inaccurate information (i.e. Agency will not purposefully enter inaccurate information to override information entered by another Agency).

D. The Agency shall not include profanity or offensive language in the HMIS database.

E. The Agency shall utilize the HMIS database for business purposes only.

F. Lead HMIS Agency will provide access to initial training and periodic updates to that training to select Agency Staff on the use of the HMIS software.

G. Lead HMIS Agency will be available for technical assistance (i.e. troubleshooting and report generation) within time and resource constraints.

H. The transmission of material in violation of any federal or state regulations is prohibited. Thus includes, but is not limited to, copyright material, material legally judged to be threatening or obscene, and material considered protected by trade secrets.

I. The Agency shall not use the HMIS database with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.

\(^1\)Real-time or close to real-time is defined by either immediate data entry upon seeing a Participant or data entry into the HMIS database within five business days.
III. Reports

A. The Agency shall retain access to identifying and statistical data on the Participants it serves.

B. The Agency’s access to data on Participants it does not serve shall be limited to that of Participants that have provided written consent permitting such access.

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

D. HCCSC will use only non-identifying, aggregate HMIS data for homeless policy and planning decisions; in preparing federal, state or local applications for homeless funding; to demonstrate the need for and effectiveness of programs; and to obtain a system-wide view of program utilization in the state.

IV. Proprietary Rights

A. The Agency shall not disclose assigned passwords and access codes of the HMIS database within any other Agency, business or individual.

B. The Agency shall not cause in any manner, or way, corruption of the HMIS database.

V. Terms and Conditions

A. Any violation of this Agreement by Agency may result in access privileges being suspended or revoked, at the discretion of Lead HMIS Agency. As a condition of continued or reinstated access, Lead HMIS Agency may require standardized or specialized Agency compliance training.

B. Agency shall implement procedures to ensure and monitor compliance with this Agreement, and all privacy and security requirements, by Agency’s staff, volunteers and other agents.

C. The HCCSC shall not transfer or assign any rights or obligations without the written consent of the other party.

D. This Agreement shall be in force until revoked in writing by either party.

E. This Agreement may be terminated with 30 days written notice. Please note that this termination does not apply to information previously entered into the HMIS; obligations related to the confidentiality of Participant information set forth herein shall continue to be adhered to beyond the termination of this Agreement.
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D.2.

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

I. Overview of the HCCSC Coordinated Entry System

A. Purpose. 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. Participation in the System and Use of this Guide. 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. Management of the Coordinated Entry System. 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 workgroups are:

   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.
II. Access to the Coordinated Entry System Through the Hotline

A. Role of the Hotline – Overview. 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. Marketing the Hotline. 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
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. Cases of Positive Screening for Human Trafficking. 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. Screening for Diversion and Referral to Other Resources.

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. Referral to Mainstream Programs and Resources. 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. Formal Intake and Standardized Assessment of People Not Diverted from the HCCSC

1. Formal Intake – In General. 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. Standardized Assessment – In General.
   a. Assessment Tools. 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. **Right to Refuse to Answer Assessment Questions.** 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. **Training to Administer Assessments.** 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 OrgCode 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. **Special Intake Protocols for Victims of Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking.**

   a. **People Not Admitted to Domestic Violence Projects.** 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. **Participants in Domestic Violence Projects.** 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. **Special Rules to Ensure Safety and Confidentiality.**

      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.

E. 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. **Exclusive Use of Prioritization Lists by Projects to Accept Participants.** 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.*)

F. **Duty of Housing Projects to Update the Hotline and the Prioritization Lists.**

1. **Informing the Hotline of Vacancies.** 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. **Using the Prioritization Lists and Documenting Interactions with Prospective Participants.**

   a. **Direct Access to the List for Providers.** 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. **Documenting Activities with Clients.** 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. **Presenting People with One Housing Option at a Time.** 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. 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 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. Consequences of Failure to Appear at Shelter.

1. People referred to a shelter by the Hotline must present themselves at the shelter on the day that they are referred, if however, they are unable to get to the shelter on the day they are referred, they will maintain right to a place at shelter, if they notify the shelter or Hotline the same day as the referral and present themselves for admission on the following day.

2. Persons failure to appear at shelter without notifying the Hotline or shelter will constitute refusal and will result in a 10-day restriction at all shelters. The 10-day restriction can be lifted with a verifiable reason of non-appearance.

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. **Corrections to HMIS Data.** 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. **Reassessment and Reprioritization.** 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. **Duty of Housing Projects to Report on Person Being Considered for Vacancies.**

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. **Reviews in Cases of Apparent Violation of Admission Rules.** 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. **Circumstances Justifying Transfers.** 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 emergency transfers;

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

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

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 for PSH.

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 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 Policies (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);


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 any wrongdoing.

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 that people...
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 Entry Committee
   before making a final judgment on complaints, especially complaints that may reflect:
   
   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 participating projects.

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. **Development of Focus Group Questions.** 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. Protecting the Source of Information and Opinions Gathered During Focus Groups. At the beginning of each focus group session, group leaders will inform those present that:

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

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

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

G. Using Focus Group Feedback to Improve the System.

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.
I. Purpose. The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) requires the Homeless Continuum of Care of Stark County (HCCSC) to establish and consistently follow standards for providing Continuum of Care (CoC) assistance. These standards must include:

A. Policies and procedures for evaluating individuals’ and families’ eligibility for CoC assistance;

B. Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;

C. Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid re-housing assistance;

D. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid re-housing assistance; and

E. Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance.

Another document -- the HCCSC’s Coordinated Entry Guide (CE Guide) -- outlines procedures for making requests for HCCSC assistance as well as the procedures that the Homeless Navigation Hotline (the Hotline) and HCCSC projects will follow in assessing and responding to those requests in a consistent manner.

This document defines various categories of homeless projects operated by agencies participating in HCCSC’s coordinated entry system (CES), including all agencies receiving Continuum of Care or Emergency Solutions Grant funds as well as all agencies receiving funds from grant programs administered by the Ohio Development Services Agency, including the Homeless Crisis Response Program ("Participating Agencies"). In addition, this document outlines common eligibility criteria for each project category and policies that the HCCSC follows in prioritizing individuals and families for services in each project category.

Note: Transitional and permanent housing projects may adopt more restrictive eligibility criteria consistent with their respective missions to serve a particular homeless subpopulation if the projects address a need identified by the HCCSC and otherwise meet the requirements of 24 CFR Section 578.93(b) pertaining to housing for specific subpopulations.

In addition, projects may adopt more restrictive eligibility criteria if their funding sources impose limits or conditions on the clients they can serve. If mandated by their funding sources, projects may also adopt different service prioritization rules as long as they adhere to the prioritization policies established herein to the best of their ability. However, in all cases where projects adopt more
restrictive eligibility criteria or service prioritization rules based on the requirements of their funding sources, those requirements must be documented and approved by the HCCSC as prescribed in the HCCSC policy entitled *Adherence to Approved Eligibility and Exclusionary Rules*.

II. Eligibility for System and Housing Diversion Assistance

A. **System Diversion Assistance.**

   1. **Who Receives System Diversion Assistance.** Hotline staff will inform people that they are ineligible for HCCSC projects and advise them to pursue other options if the information those people provide, either during pre-screening or during formal intake and assessment, reveals that:

      a. They have other resources or support networks that they can use to solve their homeless crisis; or

      b. They are not homeless within the meaning of 24 CFR Section 578.3 or at risk of homelessness and potentially eligible for any of the prevention or shelter diversion programs operating under the auspices of the HCCSC.

   2. **The Assistance Provided.** The Hotline staff will explore other options with people not eligible for HCCSC projects and help them make well-informed decisions about which options they should pursue. To this end, the staff will maintain a list of mainstream resources available in the community to people experiencing housing instability.

B. **Housing Diversion Assistance.** If, based on information and assessment gathered during formal intake and assessment, the Hotline staff concludes that people are eligible for shelter but do not meet minimum requirements for any of the HCCSC’s housing projects, staff will inform those people that they are ineligible for HCCSC housing projects and advise that they will need to work with shelter staff to pursue other housing options.

III. Eligibility and Prioritization for Homelessness Prevention Programs

A. **Independent Prevention Programs.** Many organizations in Stark County offer funds to help individuals and families pay the arrears in rent and utilities that put them at risk of losing their housing. Since many of these programs are funded by private sources and operate independently of HCCSC, the Hotline is unaware in many instances of what programs have funding available and what criteria they use in determining eligibility for funding. However, the HCCSC will attempt to identify and will convene representatives of prevention programs at least once a year in an effort to:

   1. Ensure that the Hotline staff is aware of the assistance these programs provide and the criteria they use in determining eligibility for this assistance so that they can refer eligible callers to the programs; and

   2. Encourage the programs to develop a well-coordinated system for preventing homelessness that uses a common set of criteria in determining eligibility for services.
B. Prevention Programs Receiving ESG or ODSA Funds.

1. Eligibility for Prevention. To be eligible for homelessness prevention services operated by Participating Agencies, individuals and families must:

   a. Be residents of Stark County;

   b. Have experienced an event or be undergoing a crisis which is expected to result in a housing loss within 21 days or less (e.g., an eviction; a foreclosure; a property condemnation; a sudden and significant loss of income; an exit from prison, foster care, or a health care institution; a sudden and significant increase in utility costs or rents);

   c. Be at least 2 months behind in their rent or utilities;

   d. Have an income at or below 30% of area median income (AMI);

   e. Be ineligible for system diversion;

   f. Need no more than $1,500 in financial support over 4 months;

   g. Have or reasonably expect to have a source of income to maintain their current housing or relocate to sustainable housing after financial assistance and services have ended; and

   h. Score in one of the following ranges on the Service Prioritization and Decision Assistance Tool (SPDAT):¹

      i. No lower than 14 and no higher than 26 on the F-SPDAT for families; or

      ii. No lower than 11 and no higher than 19 on the SPDAT for individuals.

2. Prioritization for Prevention. The following rules will be followed in prioritizing households for prevention services:

   a. Prioritization of Families with Minor Children. Households with minor children will be prioritized for services before households without children.

   b. Prioritization of Veterans. Households with veterans will be prioritized for services before households without veterans.

   c. Prioritization Based on Acuity of Need. Within each household category (e.g., households with minor children, households with veterans, households without veterans or minor children),

¹Effective January 20, 2015, HCCSC adopted SPDAT as it standardized assessment tool.
families and individuals with higher SPDAT scores will be prioritized for service before those with lower scores.

d. **Prioritization Based on Susceptibility to Homelessness.** In cases where SPDAT scores are equal, prevention staff may determine which should be prioritized for service due to higher susceptibility to homelessness by considering such factors as history of evictions and numbers of previous homeless episodes.

3. **Requirement to Exhaust Other Resources.** Before providing prevention services to any household, prevention staff must determine whether they have exhausted other options available to them.

   a. In the case of families with minor children, staff should determine whether they are eligible for services provided by the Department of Job and Family Services and, if they are, collaborate with DJFS to help families access those services.

   b. In the case of households with veterans, staff should determine whether they qualify for emergency housing assistance from the Veterans Services Commission or any other source that provides special assistance to veterans.

IV. **Eligibility and Prioritization for CommQuest’s Shelter Diversion Pilot Project**

A. **Eligibility for Shelter Diversion Pilot Project.** To be eligible for the shelter diversion pilot project operated by CommQuest, individuals and families must:

   1. Be residents of Stark County;
   2. Be precariously housed currently;
   3. Have an income below 50% of the area median income (AMI);
   4. Have completed the Hotline’s intake and assessment, requested emergency shelter, and been placed on the shelter diversion list;
   5. Have or expect to have a source of income to maintain their current housing or relocate to sustainable housing; and
   6. Score in one of the following ranges on the Service Prioritization and Decision Assistance Tool (SPDAT):

      a. No lower than 30 and no higher than 39 on the F-SPDAT for families; or
      b. No lower than 22 and no higher than 29 on the SPDAT for individuals.

B. **Access to the Shelter Diversion Pilot Project.**

   1. Hotline staff will identify eligible individuals and families from the shelter diversion prioritization list.

   2. Hotline staff will inform the identified eligible individuals and families of the shelter diversion pilot project using a uniform description provided by CommQuest and instruct them to send income verification to CommQuest to indicate their commitment to enrolling.
3. CommQuest staff will maintain a record of eligible individuals and families who send their income verification and only admit to the project eligible individuals and families from that record.

C. Prioritization for Shelter Diversion Pilot Project. The following rules will be followed in prioritizing households who send income verification to CommQuest for shelter diversion pilot project services:

1. Families with Minor Children. Households with minor children will be prioritized for services before households without children.

2. Veterans. Households with veterans will be prioritized for services before households without veterans.

3. Acuity of Need. Within each household category (e.g., households with minor children, households with veterans, households without veterans or minor children), families and individuals with higher SPDAT scores will be prioritized for services before those with lower scores.

4. Susceptibility to Homelessness. In cases where SPDAT scores are equal, shelter diversion pilot project staff may determine which should be prioritized for services due to higher susceptibility to homelessness by taking into account such factors as history of evictions, history of prevention assistance, history of emergency assistance, and numbers of previous homelessness episodes.

D. Inability to Locate Appropriate New Housing for Shelter Diversion Pilot Project Clients with Higher Priority Who Must Relocate to Sustainable Housing. Although the shelter diversion pilot project must make a diligent effort to serve clients in the order of priority outlined in this section, in cases where clients must relocate to new sustainable housing, the project may deviate from that order when housing becomes available that does not meet the needs of households with higher priority but does meet the needs of those with lower priority.

E. Requirement to Exhaust Other Resources. Before providing shelter diversion pilot project services to any household, shelter diversion pilot project staff must determine whether they have exhausted other options available to them.

1. In the case of families with minor children, staff should determine whether they are eligible for services provided by the Department of Job and Family Services and, if they are, collaborate with DJFS to help families access those services.

2. In the case of households with veterans, staff should determine whether they qualify for emergency housing assistance from the Veterans Service Commission or any other source that provides special assistance to veterans.

V. Eligibility and Prioritization for Emergency Shelter

A. Definition of Emergency Shelter. An “emergency shelter” is any facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless in general or for a specific population of homeless persons. On average, stays in emergency shelters should be no more than 90 days.

B. Eligibility for Shelter. To be eligible for emergency shelter offered by Participating Agencies, individuals and families must:
1. Be present in Stark County when requesting shelter; and

2. Lack other nighttime shelter meant for human habitation, apart from a motel or hotel room paid for by a charitable organization or by a federal, state, or local government program for low-income individuals.

C. **Permissible Reasons for Excluding or Expelling People from Shelter.** Shelters may deny admission or terminate service to people for the following reasons only:

1. Because they need medical services that the shelter is not equipped to provide;

2. Because they exhibit violent or aggressive behavior that suggests that they may be a danger to others;

3. Because they exhibit behavior that suggests that they may be a danger to themselves;

4. Because they have brought illegal drugs or alcohol onto the premises;

5. Because they have violated fire or other safety rules; or

6. Because they have failed to appear at a shelter to which they have been referred in accordance with the requirements of Section IV.I. of the *CE Guide* or have failed to make use of a shelter bed or unit assigned to them.

D. **Ten-Day Time-out Rule.** In the event that it declines to admit or expels a person for permissible reasons, a shelter may exercise its discretion to refuse to admit or readmit that person for ten days. Longer periods of exclusion must be justified by compelling facts and circumstances.

E. **Impermissible Reasons for Denying or Terminating Service.** Shelters may not deny or terminate services for any of the following reasons:

1. Because a person lacks ID, income, or employment;

2. Because a person was previously expelled from the shelter – unless the refusal to accept the person conforms to a system-wide rule allowing certain waiting periods before such returns; or

3. Any reason that violates the Fair Housing and Equal Access Rules adopted by the HCCSC. (See policy entitled *Fair Housing and Equal Access Standards.*)

F. **Prioritization for Shelter.** In the event there is a waiting list for shelter, the following rules will apply:

1. **Chronically Homeless.** Chronically homeless individuals and families will be prioritized for shelter before those who are not chronically homeless.

2. **Families with Minor Children.** Families with minor children will be prioritized for available units at all family shelters.
3. **Acuity of Need.** Among the chronically homeless as well as among those who are not chronically homeless, individuals and families receiving the highest SPDAT score will be served first.

4. **Veterans.** Households with veterans will be served before households with equal acuity of need.

VI. **Types of Housing Projects and Common Eligibility Criteria**

A. **Categories of Available Housing Projects.** Eligible households may access the following types of housing projects through HCCSC’s coordinated entry system:

1. **Rapid Re-housing (RRH).** Rapid re-housing projects help homeless families and individuals locate and secure appropriate rental housing in the community; help in paying move-in costs, deposits, and rental and utility expenses for a limited period; and provide case management and other services designed to address issues that may prevent clients from achieving sufficient independence to maintain housing after RRH assistance ends.

2. **Transitional Housing (TH).** Transitional housing projects provide homeless individuals and families with rent-subsidized housing either in the community or in properties leased to or owned by the agency operating the program, typically for no more than 12 months but up to a maximum of 24 months. Designed for clients who need more intensive, longer-term support than those who are appropriate for RRH, TH also provides case management and other services, either directly or through referral, that are designed to prepare clients for independent living after their eligibility for TH expires.

3. **Permanent Supportive Housing (PSH).** Permanent supportive housing projects are designed to serve only homeless persons with long-term disabilities that substantially impede their ability to live independently. They provide community-based housing and the supportive services necessary to maintain disabled persons in that housing without limit on their length of stay.

B. **Common Eligibility Criteria for Admission to All Housing Projects.**

1. **Presence in Stark County:** To gain admission to any of the housing projects operated by Participating Agencies, individuals and families must have resided in Stark County for at least 60 days. An exception to this rule is when a client has left the county to seek shelter if there are no shelter beds available in Stark County. The client would need to be directed out of the county by the CES, Domestic Violence System (DVS) or a provider. It is the responsibility of the DVS and provider to notify CE that they have directed a client out of county.

2. **“Literally Homeless” or Fleeing Domestic Violence.**
   a. With the exception of TH projects, housing projects operated by Participating Agencies may serve only persons who are either:
      i. “Literally homeless”;
      or
ii. Fleeing or attempting to flee domestic violence, dating violence, sexual assault or stalking and have no other residence and no resources or support networks they can use to obtain permanent housing.

b. In addition to serving persons who are literally homeless or who are fleeing or attempting to flee domestic violence, TH projects may also serve young adults (ages 18 through 24) who are at imminent risk of homelessness and who otherwise qualify for TH. However, in no circumstances, may young adults at risk of homelessness be prioritized for TH housing over other individuals who are literally homeless or fleeing domestic violence.

3. **Income.** Individuals and families must have incomes below 60% of the area median income (AMI) at the time they are admitted to a housing project.

4. **Age.** Individuals must be at least 18 years old, and families must be headed by at least one individual who is at least 18 years old.

5. **ID Number.** Prospective participants must provide their social security number or alien identification number.

**VII. Additional Eligibility Criteria and Prioritization Rules for Rapid Re-housing**

A. **Eligibility for RRH.** To be eligible for RRH projects operated by Participating Agencies, individuals and families must be literally homeless. In addition, they must be meet the following criteria:

1. Individuals must score no lower than 20 and no higher than 34 on the SPDAT; and

2. Families must score no lower than 27 and no higher than 53 on the F-SPDAT.

B. **Prioritization for RRH.** In the event there is a waiting list for RRH, the following rules will apply:

1. **Households with Minor Children.** To achieve the goal of re-housing all families with minor children within 30 days after they become homeless, all such households will be prioritized for RRH before all other households.

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2. For purposes of these policies, “literally homeless” means meeting the criteria outlined in the first paragraph of the definition of “homeless” set forth in 24 CFR section 578.3. Thus, to be “literally homeless,” an individual or family must lack a fixed, regular, and adequate nighttime residence, including:
   i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
   ii. An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local programs for low-income individuals); or
   iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

3. In accordance with 24 CFR section 578.3, an individual or family is at imminent risk of homelessness if:
   i. They will lose their residence within 14 days of the application for homeless assistance;
   ii. They have identified no subsequent residence; and
   iii. They lack the resources and support networks needed to obtain other permanent housing.
2. **Chronically Homeless.** Among both households with minor children and other households, chronically homeless individuals and families will be prioritized for RRH before those who are not chronically homeless.

3. **Acuity of Need.** Among both the chronically homeless and those who are not chronically homeless, households with higher SPDAT scores will be prioritized for RRH before those with lower scores.

4. **Veterans.** Among households with equal SPDAT scores, households with veterans will be prioritized for RRH before households without veterans.

5. **Date and Time of Intake.** Among households with equal SPDAT scores without either veterans or minor children, priority will be given to the household that has been waiting longest for housing, as determined by date and time of intake into HCCSC.

C. **Re-Scoring Persons Who Seem Unlikely to Succeed in RRH.**

1. If, in processing people for intake into an RRH project, project staff determines that it is highly unlikely that they will succeed in RRH, staff should re-administer the SPDAT assessment to determine whether they are eligible for PSH. Reasons for re-administering the SPDAT include the following:
   
   a. Evidence that persons have been chronically homeless or homeless repeatedly and for significant periods of time; and
   
   b. Evidence that persons are suffering from one or more disabilities that have prevented them and will prevent them in the future from securing the income necessary to sustain housing.

2. If people score within the SPDAT range for RRH but have already received the maximum amount of assistance available from RRH projects, staff at the shelter serving the people or, if the people are unsheltered, staff at the Hotline will re-administer the SPDAT to determine whether they qualify for PSH.

3. If, upon re-administration of the SPDAT under the circumstance described in subsections VII.D.1 or VII.D.2 above, people continue to fall within the range of scores that make them eligible for RRH rather than PSH, the staff that has re-administered the SPDAT must bring their cases to the Quality Assurance Workgroup for case conferencing.

**VIII. Additional Eligibility Criteria and Prioritization Rules for Transitional Housing**

A. **Eligibility for TH.** To be eligible for TH projects operated by Participating Agencies, individuals and families must satisfy both of the following criteria relating to SPDAT scores and income:

1. **Standardized Assessment Scores**
a. Individuals must score above 34 on the SPDAT; and

b. Families must score above 53 on the F-SPDAT.

2. **Income Minimum/Maximum.** Individuals and families must have incomes at or below 50% of AMI.

B. **Prioritization for TH.** In the event there is a waiting list for TH, the Hotline and HCCSC projects will give priority to individuals and families who qualify as chronically homeless. Among those who qualify as chronically homeless as well as those who do not qualify as chronically homeless, priority will be given to those with the greatest acuity of need as measured by SPDAT. Among those with equal acuity of need, priority will be based on the date and time of intake, with those who have been waiting longer receiving higher priority.

IX. **Additional Eligibility Criteria and Prioritization Rules for Permanent Supportive Housing**

A. **Eligibility for PSH.** To be eligible for PSH projects operated by Participating Agencies, individuals and families must satisfy the following criteria relating to standardized assessment scores and disability:

1. **Standardized Assessment Scores.**

   a. Individuals must score above 34 on the SPDAT; and

   b. Families must score above 53 on the F-SPDAT. (See Section X.C of this policy for exceptions to this rule)

2. **Disability.** Only individuals with disabilities and families in which at least one adult has a disability except for non-dedicated and non-dedicated plus family units in which case at least one adult or child has a disability are eligible for PSH projects operated by Participating Agencies.\(^4\)

B. **Prioritization of Participants Transferring Between PSH Units.** Current PSH project participants whose requests for transfers to another PSH unit have been approved for any of the reasons outlined in the Section VI.A. of the HCCSC’s *CE Guide* will be prioritized for PSH vacancies before all other persons awaiting PSH. Current PSH participants awaiting transfers will be prioritized based on the criteria outlined for PSH in section IX.C of this policy.

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\(^4\)For purposes of this section, the definition of “disability” is the same as that outlined in 24 CFR 582.5.
C. Prioritization of Prospective PSH Participants

1. Order of Priority for PSH Beds Dedicated to or Prioritized for Occupancy by Clients Experiencing Chronic Homelessness

Following the recommendations outlined in HUD’s Notice CPD-16-11, the Hotline and HCCSC projects will observe the following rules in prioritizing individuals and families for vacancies in PSH beds dedicated to or prioritized for occupancy by persons experiencing chronic homelessness:

a. First Priority – Chronically Homeless Individuals and Families with the Longest History of Homelessness and with Severe Service Needs. Highest priority will be given to chronically homeless individuals or heads of household (in the case of families), as defined in 24 CFR 578.3, for whom both of the following are true:

i. The chronically homeless individuals or heads of household have been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least 4 separate occasions in the last 3 years, where the cumulative total length of the 4 occasions equals at least 12 months; and

ii. The individuals or heads of household have been identified as having “severe service needs” that are identified and verified by standardized assessment.

b. Second Priority – Chronically Homeless Individuals and Families with the Longest History of Homelessness. Second highest priority will be given to chronically homeless individuals or heads of household (in the case of families), as defined in 24 CFR 578.3, for whom both of the following are true:

i. The chronically homeless individuals or heads of household have been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least 4 separate occasions in the last 3 years, where the cumulative total length of the 4 occasions equals at least 12 months; and

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5 24 CFR 578.3 defines “chronically homeless” as:

1) An individual who:
   i. Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
   ii. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and
   iii. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;

2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all the criteria in paragraph 1 of this definition before entering that facility; or

3) A family with an adult head of household (if there is no adult in the family, a minor head of household) who meets all the criteria in paragraph 1 of this definition, including a family whose composition has fluctuated while the head of household has been homeless.
ii. The individuals or heads of household, though meeting all the criteria of paragraph 1 of the definition of “chronically homeless,” have not been identified as having severe service needs.

c. **Third Priority – Other Eligible Individuals and Families.** Where there are no chronically homeless individuals and families within Stark County, HCCSC will follow the order of priority outlined in Section IX.C.2 below, in assigning eligible, but not chronically homeless, individuals and families, to beds dedicated or prioritized for the chronically homeless.

2. **Order of Priority for PSH Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness and for Dedicated and Prioritized Beds When Chronically Homeless Persons Cannot be Identified for Those Beds**

Following the recommendations outlined in HUD’s Notice CPD-16-11, the Hotline and HCCSC providers will observe the following rules in prioritizing individuals and families for vacancies in PSH beds not dedicated to or prioritized for occupancy by the chronically homeless and in PSH beds that have been dedicated to or prioritized for the chronically homeless when no chronically homeless individuals or families can be identified to occupy those beds:

a. **First Priority - Homeless Individuals and Families with a Disability and with Long Periods of Episodic Homelessness and Severe Service Needs.** The highest priority will be given to homeless individuals or heads of household (in the case of families), as defined in 24 CFR 578.3, who are eligible for CoC Program-funded PSH for whom both the following are true:

i. The homeless individual or head of household has been literally homeless on fewer than 4 separate documented occasions in the last 3 years, where the total length of those separate occasions equals is at least 12 months; and

ii. The homeless individual or head of household has been identified as having severe service needs.

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6 For purposes of CPD-16-11, a person with severe service needs is one for whom at least one of the following is true: (1) History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or (2) Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support to maintain permanent housing. The notice goes on to say that, for youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living conditions may constitute severe service needs.

The notice further specifies that severe services needs should be “[i]dentified and verified through data-driven methods such as an administrative data match or by using a standardized assessment tool and process and should be documented in a program participant’s case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual”
b. **Second Priority – Homeless Individuals and Families with a Disability and Severe Service Needs.** Second priority will be given to homeless individuals or heads of household (in the case families), as defined in 24 CFR 578.3, who are eligible for CoC Program-funded PSH and who have severe service needs. In the case of individuals or heads of household with equally severe service needs, those with the longest cumulative length of documented homelessness during the last 3 years will receive priority.

c. **Third Priority – Homeless Individuals and Families with a Disability Without Severe Service Needs.** Third priority will be given to individuals and heads of households (in the case of families) who are eligible for CoC Program-funded PSH but who have not been identified as having severe service needs. In the case of individuals or heads of household in this category, those with a higher SPDAT score will be prioritized before those with a lower score. Where scores are equal, those with the longest cumulative length of documented homelessness during the last 3 years will receive priority.

d. **Fourth Priority – Homeless Individuals and Families with a Disability Coming from Transitional Housing.** Fourth priority will be given to individuals and heads of households (in the case of families) who are:

i. Eligible for CoC Program-funded PSH and currently residing in a transitional housing project, where, before residing in the transitional housing, they had lived in a place not meant for human habitation, in an emergency shelter, or in a safe haven; or

ii. Eligible for CoC Program-funded PSH and currently residing in a transitional housing project if they were fleeing or attempting to flee domestic violence before residing in the transitional housing even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven before entering the transitional housing.

X. **Acceptable Deviations from Prescribed Priorities**

A. **Projects Targeting Specific Populations.** In serving people, projects must follow the orders of priority specified in Sections II-IX of these policies while also taking into consideration their own specific goals and any identified target populations they are intended to serve. For example, a PSH project that is permitted to target homeless persons with a serious mental illness should follow the order of priority prescribed for PSH projects in selecting for service those people on the PSH prioritization list who have a serious mental illness.

B. **Projects with Funding Sources that Establish Different Rules for Prioritization.** Projects that have funding sources that require them to follow different rules for prioritizing services to people are expected to follow the appropriate order of priority specified in Sections II-IX of these policies to the best of their ability without jeopardizing their funding.
C. **Inability to Locate or Engage Persons with Higher Priority.** Both the Hotline, in making referrals to emergency shelter, and projects, in accepting people from the central prioritization lists, must exercise due diligence to ensure that persons are served in the order of priority outlined in Sections II-IX of these policies. However, projects are not required to keep beds or units vacant and available to persons who meet a higher priority if those persons cannot be contacted, certified as eligible for the project, or persuaded to accept the beds or units offered to them within the time specified in Section IV of HCCSC’s *Coordinated Entry Guide*. In cases where there is an inability to locate a PSH eligible family willing to accept a vacant PSH unit, providers may take the next highest scoring RRH family, provided:

a. The family has at least one adult with a disabling condition, as defined in IX.2 of this policy;

b. Attempts were made to contact all PSH eligible families in accordance with Section IV.G of *HCCSC’s Coordinated Entry Guide*; and

c. The case is approved at a Quality Assurance Workgroup meeting.

**XI. Standards for Administering Assistance**

A. **Requirement for Lease or Occupancy Agreement.** All CoC-funded housing programs must require a lease or occupancy agreement with tenants that must be at least one month (TH) or one year (RRH and PSH) in duration. The lease agreement must observe Fair Housing Act regulations.

B. **Tenant Rent Portion for TH and PSH.** TH and PSH project participants must pay rent in the amount dictated by the funding source(s) of their housing projects. In the absence of any more restrictive rules imposed by those funding sources, participants must pay rent equal to the highest of 30% of their monthly, adjusted income or 10% of their monthly gross income or the portion of the family’s welfare assistance, if any, designated for the payment of rent (including utilities). If participants have zero income, they are not required to pay rent, but, in that event, the housing project staff or its supportive services partner staff is expected to work with the participants to secure income (either earned or unearned) as soon as possible.

C. **Rules Regarding Nature, Amount, and Duration of Assistance in Rapid Re-Housing.** The following rules govern the nature, amount, and duration of financial assistance and other services available to households participating in RRH programs:

1. As necessary to secure housing for participants, RRH projects will pay their first month’s rent and security deposit;

2. RRH projects will provide rental assistance and security deposits only for housing that:

   a. Meets reasonable rent standards as determined by HUD regulations;
b. Meets HUD’s Housing Quality Standards (in the case of CoC-funded housing) or “habitability standards” (in the case of ESG-funded housing); and

c. Is made available to a participant through a lease agreement between the participant and the landlord that permits occupancy for at least one year, subject only to early termination for cause.

3. Households must pay a minimum of 30% of their monthly, adjusted income toward their rent;

4. Participants must re-certify their income at least every 90 days, and, if their income changes, they will receive a 30-day notice before the financial assistance they receive is reduced or terminated;

5. If RRH participants have no income and are unable to contribute to their rent, they will receive rental assistance in declining amounts over the course of their participation in the program as outlined below:

   a. Rental assistance sufficient to cover 100% of their rent and utilities during their first 90 days in the program;

   b. Rental assistance sufficient to cover 75% of their rent and utilities during their second 90 days in the program and, under extenuating circumstance, rental assistance of the same amount for an additional 90 days;

   c. Rental assistance sufficient to cover 50% of their rent and utilities during their third 90 days in the program; and

   d. Rental assistance sufficient to cover 25% of their rent and utilities during their fourth 90 days in the program.

6. Households will receive rental assistance for no more than 12 months, except in the extenuating circumstances referred to above, in Section XI.C.5.b.

7. RRH projects will provide case management services to participants, which must include help in developing a realistic plan for weaning the participants from rental assistance within 12 months. In addition, RRH case managers must meet with participants at least monthly to evaluate their progress in executing their plan and to provide additional assistance, as needed. If they choose, households may continue to receive case management services through RRH projects for an additional 90 days after they have secured income sufficient to cover 100% of their rent and utilities and ceased to receive financial assistance

8. Households may not receive additional assistance from an RRH project for at least 12 months after exiting that or another RRH project.

9. Households may not receive assistance from an RRH project for more than 24 months over a period of 5 years.
D. **Occupancy Charges in Leasing Programs.** Participants in leasing programs may be charged an occupancy charge up to 30% of their monthly adjusted income or 10% of their monthly gross income or the portion of the family’s welfare assistance, if any, designated for the payment of the rent (including utilities), whichever is the greatest.
City of Canton
Department of Development

Notice of Funding Availability

Guidelines
For
Emergency Solutions Grant Funds

2019-2020

Thomas M. Bernabei
Mayor

Rollin Seward, Director
Department of Development
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I General Information

BACKGROUND

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009, amends and reauthorizes the McKinney-Vento Homeless Assistance Act with substantial changes, including:
- Consolidation of three homeless programs – the Supportive Housing Program, Shelter Plus Care and the Single Room Occupancy into a single grant program;
- Changes in HUD’s definition of homelessness and chronic homelessness;
- Increased prevention and rapid re-housing resources; and
- Increased emphasis on performance and continuum-wide coordination.

This law revised the Emergency Shelter Grants program and renamed the program the Emergency Solutions Grants program (ESG). ESG is designed to broaden existing emergency shelter and homelessness prevention activities and to add short and medium-term rental assistance and services to rapidly re-house homeless people. The ESG Program implements a variety of measures directed toward keeping individuals and families from losing their homes. The program is designed to improve administrative efficiency and enhance response coordination and effectiveness in addressing the needs of homeless persons. It enhances the Continuum of Care planning process, the coordinated response for addressing the needs of homelessness.

HUD PRIORITIES OF THE ESG PROGRAM

In developing the Emergency Solutions Grant regulations, HUD determined its priorities to include:
- Broaden existing emergency shelter and homelessness prevention activities;
- Emphasize Rapid Re-Housing;
- Help people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness;
- Enhance alignment of ESG regulations with other HUD programs – including CDBG, HOME, and Housing Choice Voucher (HCV) program;
- Support more coordinated and effective data collection, performance measurement, and program evaluation.
ELIGIBLE COMPONENTS AND POPULATIONS TO BE SERVED

The chart below indicates the eligible components of the ESG program and the populations that they may serve.

<table>
<thead>
<tr>
<th>Component</th>
<th>Serving Those who are literally Homeless</th>
<th>Serving Those who are at risk of homelessness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Street Outreach</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Emergency Shelter</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Homelessness Prevention</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Rapid Re-Housing</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>HMIS</td>
<td>Collecting Data on X</td>
<td>Collecting Data on X</td>
</tr>
</tbody>
</table>

ESG AND THE CONTINUUM OF CARE

The ESG program is designed as the first step in a continuum of assistance to prevent homelessness and to enable the homeless population to move steadily toward independent living. The Continuum of Care model is based on the understanding that homelessness is not caused by simply a lack of shelter, but involves a variety of underlying needs. HUD believes the best approach to alleviating homelessness is through a community-based process that provides a comprehensive response to diverse needs of homeless persons.

All ESG subrecipients must actively participate in the Homeless Continuum of Care of Stark County (HCCSC) through participation in the full membership and preferably on one of the various committees of HCCSC also. Failure to actively participate will result in suspension of funding and may result in recapture of ESG funds.

HMIS AND COORDINATED ENTRY

Applicants must participate in the Homeless Management Information System (HMIS) unless it is a domestic violence project which must maintain a comparable HMIS system internally.

Applicants must participate in the County’s HCCSC’s Coordinated Entry System.

For renovation projects, the length of time that HMIS reporting is required will be dependent upon the affordability period of the project. All renovation affordability periods are currently 3 years.

FAMILIARIZATION WITH REGULATIONS

It is the responsibility of each applicant of ESG funding to become familiar with the HUD ESG regulations (Federal register Vol. 76, No. 233, Dated Monday, December 5, 2011. These regulations can be found on the HUD Exchange web site at www.hudexchange.info. Additional resources, including webinars, can also be found on the One CPD web site which can be of value in assisting agencies with completing the application.

HCCSC Board Approved 11/13/18 Recipient Approval and Evaluation Committee - DRAFT
II Application Process

APPLICATION
The application must be completely filled out with all attachments completed and submitted by the due date. Applications submitted after the due date and time will be returned to the applicant unopened. Applications must be completed on the application form. Only those attachments requested will be accepted. Additional attachments will not be reviewed.

A separate application must be submitted for each project and type of activity for which funding is being requested.

Applications must be submitted in sealed envelopes and include five (5) copies of all required documents. The original application must be signed in blue ink.

Do not put applications in binders. Application pages are to be submitted in the order in which they appear on the form. The application must include information and attachments as outlined in the Application Checklist. Only one copy of the financial audit needs to be included and must be attached to the original application.

APPLICATION DUE DATE
Applications are due by DATE and received at the address below.

City of Canton
ATTN: Renee Biggums
218 Cleveland Ave. S.W., 5th Floor
Canton, Ohio 44702

APPLICATIONS SENT BY FAX OR E-MAIL WILL NOT BE ACCEPTED. LATE OR INCOMPLETE APPLICATIONS WILL NOT BE CONSIDERED.

APPLICATION REVIEW
All applications will be reviewed by the City of Canton for eligibility. Those projects determined to be ineligible for funding will be returned to the applicant with an explanation of the determination. All projects will be evaluated and scored by the HCCSC Recipient Approval and Evaluation Committee. In accordance with the Procedures for Inviting and Reviewing Applications for ESG funding (found on the HCCSC website under Policies & Procedures at www.starkcountyhomeless.org) project applications will be scored and ranked and will be submitted to the City for its final approval.

All applications will be ranked by the Recipient Approval and Evaluation Committee no later than DATE. The scoring and ranking of these projects will be recommended to the HCCSC Board of Directors for approval which will then be recommended to the City of Canton.
ELIGIBLE APPLICANTS

Eligible applicants must be incorporated non-profit organizations in the State of Ohio which provide programs for qualified homeless and at risk of homeless persons in the City of Canton.

III. Other Requirements

CONTRACT/GRANT AGREEMENT PROCESS

All applicants will be notified of funding decisions by mail and award letters and funding agreements will be provided to recipients.

All 2019-2020 grant awards must be expended in accordance with the signed contract agreement.

City of Canton Department of Development Staff may contact all applicants for verification or clarification of information or for additional information prior to a funding decision.

CONTRACT/SUBRECIPIENT AGREEMENTS

The City of Canton Department of Development will enter into contracts or subrecipient agreements with all agencies that are awarded funds. Contracts and agreements will contain provisions for cancellation in cases where the subrecipient fails to adhere to the terms and conditions outlined in the contract or agreement or for other unacceptable performance. Contracts and agreements will:

- Stipulate the total amount of the award;
- Stipulate the program and component of the award;
- Stipulate a specified contract period;
- Indicate the method of funds disbursement; and
- Set forth performance requirements and production schedule.

Recipients who have not complied with the terms of previous agreements, (i.e. failure to utilize funds within the time specified, failure to submit requested documents and/or information in the manner requested or in a timely manner) may be denied funding.

ADDITIONAL REQUIREMENTS

All applicants must be in good standing with the City for grants previously received. In addition, they must be in good standing with the City of Canton and Stark County in payment of city income tax, real estate taxes, personal property taxes, water and sewer
charges or other city assessments for any properties owned within the City of Canton. Attachment III must be completed and submitted within the application to provide proof of this information.

Primarily religious organizations must agree to provide all activities under this program in a manner that is free from religious influences.

Applicants must agree to the following Performance Measures, as applicable to project type and to meeting outcome targets as determined by the Homeless Continuum of Care of Stark County. Outcomes will be monitored by HMIS and the City of Canton:

1. Length of Time Persons Remain Homeless

2a. Extent to Which Persons Who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within 6 to 12 months

2b. Extent to Which Persons Who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within 2 years

3. Number of Homeless Persons and Families


5. Number of Persons Who Become Homeless for the First Time

6. Successful Placement from Street Outreach

ADDITIONAL DOCUMENTS

Additional documents required with the application:

- Organizational chart with all vacancies indicated
- Position descriptions for all affected staff positions
- Applicant’s most recent audit report and most recent financial statement (must be after 2018)
- Applicant’s operating budget for the current year
- Internal Revenue Service 501 (c) designation
- Articles of Incorporation
- Agency by-laws
- Certificate of Good Standing from the Secretary of State (current year)
- List of all current members of the organization’s board of directors
- Last three months of board minutes, including attendance
• Copy of the organization’s conflict of interest policy/questionnaire

Approved projects also may be required to show:
• Property deeds
• Proof of insurance
• Current Fire Inspection for each facility that funds are being requested for
• Certificate of occupancy for each facility that funds are being requested for
• Various other documents as required

OTHER FEDERAL REQUIREMENTS

Recipients must abide by the requirements detailed in the Code of Federal Regulations Part 91 and 576, Housing and Urban Development and Title 42, Public Health and Welfare, and OMB Circulars A122 and A133 or 2 CFR Part 200 as applicable; regulations related to Lead-Based Paint Hazards, and other applicable federal and state regulations. Additional requirements, including reporting requirements, may be communicated prior to executing a Grant Agreement.

The Code of Federal Regulations can be found at:

OMB Circulars can be found at:
https://obamawhitehouse.archives.gov/omb/circulars_default

LEAD-BASED PAINT REQUIREMENTS

All properties funded with Federal monies must comply with HUD Lead Safe Housing Rule, 24 CFR 35, subparts A, B, H, J, K, M and R. All emergency shelter and transitional housing facilities constructed prior to 1978 must be inspected to determine the possible presence of lead-based paint hazards. City of Canton staff will perform the initial inspections and recommend appropriate actions.

Copies of the applicable regulations are available for download at:

FACILITY STANDARDS

Any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation, and privacy standards which can be found at:
https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-
The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and Water Sense products and appliances. The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act and implementing regulations at 24 CFR Part 8; the Fair Housing Act and implementing regulations at 24 CFR Part 100; and Title II of the Americans with Disabilities Act and 28 CFR Part 35; where applicable.

HANDICAPPED ACCESSIBILITY

All properties funded with Federal monies must comply with Section 504 Standards. Copies are available for download at:

https://www.hud.gov/program_offices/fair_housing_equal_opp/disabilities/sect504docs

All ESG applicants must submit Attachment I as a statement describing the handicapped accessibility of every facility to be assisted with ESG funds. If a facility is not handicapped accessible, the applicant must submit a detailed plan for sheltering a handicapped person.

FAIR HOUSING

All properties funded with Federal monies must comply with City of Canton Codified Ordinance 515 Fair Housing Code, which is available at:


MATCH

All recipients of ESG funds are required to provide a dollar-for-dollar match. The match must be for the specific project for which ESG funding is requested and must be received and expended within the grant year.

Eligible sources of match are:
Cash;
The fair rental value of any donated materials or buildings;
The value of the time and services contributed by volunteers to carry out the program of the subrecipient at a current rate of $10.00 per hour. [Note: Volunteers providing professional services such as medical or legal services are valued at the reasonable and customary rate in the community.]

CONFlict of INTEREST

No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest...
interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure. The conflict of interest provisions apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients.

**INVESTigation OF HOMELESS PERSONS**

All ESG subrecipients must involve homeless individuals and families in the maintenance and operation of facilities, and in the provision of services to residents of these facilities to the maximum extent possible. Methods of achieving client involvement may include having a suggestion box; using chore lists and exit interviews; conducting regularly scheduled house meetings; encouraging clients to assist with children's programs, parenting classes or vocational training; or service as members of the Board.

The involvement of homeless persons is required through 24 CFR 576.

**PROCESS OF TERMINATING ASSISTANCE**

The recipient or subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant’s assistance is terminated only in the most severe cases. To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of: (1) Written notice to the program participant containing a clear statement of the reasons for termination; (2) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and (3) Prompt written notice of the final decision to the program participant. Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual.

24 CFR 576.402 allows for termination of assistance to an individual or family who violates program requirements. Termination must be in accordance with a formal process established by the organization that recognizes the rights of individuals affected. The policy must meet Uniform Relocation Assistance (URA) requirements, which is available on the City’s website.

There must be an appeals procedure for clients who are evicted or refused service from the facility for any reason. At a minimum, someone other than the person who made the initial termination of services must hear any appeals. Clients must be informed of the appeals procedure at intake.

A copy of your termination policy must be submitted as Attachment III.

**RECORD KEEPING AND REPORTING REQUIREMENTS**

[Attachment III]
All ESG subrecipients must have policies and procedures established in writing to ensure that the requirements of 24 CFR 576.500 record keeping and reporting requirements are met.

Applicable regulations and policies are available for downloading on the City’s website. Copies will be provided to agencies without internet access who are awarded funding.

**FAITH-BASED ACTIVITIES**

Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to receive ESG funds. Organizations that are directly funded under the ESG program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for program participants.

**BIDDER AND CONTRACTOR EMPLOYMENT PRACTICES REPORT**

For any awards of more than $25,000, completion of the Bidder and Contractor Employment Practices Report (Attachment VI) is one of the steps which demonstrate compliance with the City of Canton’s Equal Employment Opportunity Program. The form is designed to provide an evaluation of your agency’s policies and practices relating to the extension of equal employment opportunity to all persons regardless to race, religion, color, sex, age, national origin, disability, sexual orientation or sexual identity.

**IV  Financial Information**

**FUNDS DISBURSEMENT**

ESG subrecipients will request their grant award reimbursement by submitting the Monthly Request for Disbursement Form with a budget which details itemized ESG and match expenditures and names the match source for operations, administration (excluding staff costs), staff costs, equipment, and/or furnishings. All ESG funds must be requested on the ESG Request for Disbursement Form. All original disbursement forms, with required backup documentation such as general ledgers, client expense reports, quotes and receipts, must be submitted via mail to: The City of Canton, Department of Development, Attn: Renee Biggums, 218 Cleveland Avenue SW, PO Box 24218, Canton, OH 44702 who will process requests for payment. Funds will be disbursed on a reimbursement basis only and require monthly status reports at the time of submission.

[Attachment VI – Bidder and Contractor Employment Practices Report]

[Commented [MT1]: This needed to be attached and my notes stated on page 11. This may need more language added.]
REPORTING AND MONITORING

All ESG subrecipients are required to submit Monthly Status Reports to the City of Canton. Reports shall include, but are not limited to, the following information:
- Reporting budget expended to date
- Reporting on performance outcomes that are applicable to the funded project type
- Reporting on any training issues or technical assistance needs

A Grant Closeout Report is required when the final reimbursement is requested.

City of Canton staff will monitor the use of grant funds through a combination of review of monthly status reports, quarterly review of HMIS/DV-comparable data outcomes, annual audit review and site visits.

AUDITS/CATALOG OF FEDERAL DOMESTIC ASSISTANCE

The Catalog of Federal Domestic Assistance number (CFDA) for ESG is 14.231. This number must be made available to the accountants who perform your organization’s audit or audited financial statements.
Organization Name: 
Project Name: 

**FY2019-FY2020 Emergency Solutions Grant (ESG) Application**

Name of Organization: 
Mailing Address: 
Agency Federal ID Number: DUNS #
Project Name: 

Contact Person (This is the person who will receive ALL grant-related information, i.e. correspondence, telephone calls, e-mails, etc.):

Name: 
Title: 
Telephone: Fax: 
E-Mail: 

**Threshold Criteria**

1. **HEARTH Act, HMIS and Coordinated Entry (CE) Compliance Agreement**

   Please certify with initials in each box indicating that your agency has read and agrees to abide by all of the following Emergency Solutions Grant requirements:

   - Overview of HUD federal regulations for the Emergency Solutions Grants Program [https://www.hudexchange.info/programs/esg/](https://www.hudexchange.info/programs/esg/)
   - Homeless Management Information System Policies and Procedures [https://starkhomeless.starkmhar.org/member-resources/charter-policies/](https://starkhomeless.starkmhar.org/member-resources/charter-policies/)
   - Coordinated Entry (CE) Policies & Procedures

HCCSC Board Approved 11/13/18
Organization Name:  
Project Name:  

https://starkhomeless.starkmhar.org/member-resources/charter-policies/

Only Victim Service Agencies can opt out of participation in HMIS and CE but must maintain a separate and comparable data system that captures all HMIS data elements while maintaining participant security standards for victim service agencies. Victim Service Agencies will be required to submit quarterly performance outcomes from an internal database.

Is your agency a Victim Service Provider as defined by 24 CFR 576.2: “A private non-profit organization whose primary mission is to provide services to victims of domestic violence, dating violence, a sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs.”

☐ Yes  ☐ No

2. Compliance with Homeless Definitions

There are five eligible program components and different eligible activity types within each of those five components. Eligibility for each component is restricted to individuals and families that meet various definitions of “homeless” or “at risk of homelessness.” In the charts below, please indicate which component and activity type you are applying for.

HCCSC 2020 priorities are as follows: TBD

<table>
<thead>
<tr>
<th>Shelter Activities</th>
<th>Suitable Living Environment/Availability/Accessibility</th>
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<tbody>
<tr>
<td>(HUD Objective/Outcome)</td>
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<tr>
<td>Renovations</td>
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<tr>
<td>☐ Essential Services</td>
<td>☐ Operations</td>
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</table>

<table>
<thead>
<tr>
<th>Street Outreach/Essential Services</th>
<th>Suitable Living Environment/Availability/Accessibility</th>
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</thead>
<tbody>
<tr>
<td>(HUD Objective/Outcome)</td>
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<table>
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<tr>
<th>Homeless Prevention</th>
<th>Decent Affordable Housing/Sustainability</th>
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<td>(HUD Objective/Outcome)</td>
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<tr>
<td>Housing Relocation &amp; Stabilization</td>
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<tr>
<td>Financial Assistance</td>
<td>☐ Rental Assistance</td>
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</table>

<table>
<thead>
<tr>
<th>Rapid Re-Housing</th>
<th>Decent Affordable Housing/Affordability</th>
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</thead>
<tbody>
<tr>
<td>(HUD Objective/Outcome)</td>
<td></td>
</tr>
</tbody>
</table>

HCCSC Board Approved 11/13/18
Recipient Approval and Evaluation Committee DRAFT
Describe how your agency will ensure and document compliance with HUD’s definition of either “Homeless” or “At Risk of Homelessness” as applicable to the project type. (max. characters 700)

Note: Only projects that serve qualifying participants are eligible for funding consideration.

3. Match Documentation

Agencies must be able to document committed and/or pending match sources in order to meet threshold requirements. Emergency Solutions Grants require a 1:1 match with sources that meet match requirements identified in ESG interim regulations (links provided above). Budget and match tables must be completed later in the application with documentation as outlined below in order to meet threshold criteria:

- Committed match sources - signed grant agreements, award letters/notifications or letters of commitment covering the match to be received for the project requesting funds and expended during the operating year of the FY2019-FY2020 grant if awarded.

- Pending match sources - written and dated correspondence with pending match source which includes amount being requested (as identified above) and confirmation that the pending match is being requested for the project requesting funds and for expenditure during the operating year of the FY2019 FY2020 grant if awarded.

Additional Scoring Elements

Previous Experience

In your previous experience operating projects with federal, state, and/or local ly fund ed projects (not just ESG), was your organization required to pay back funds or found to be in violation of regulations?

☐ Yes  ☐ No

HCCSC Board Approved 11/13/18 Recipient Approval and Evaluation Committee  DRAFT
Organization Name:
Project Name:

If yes, indicate the dates and actions cited. (max. characters 500)
Capacity and Target Populations

*Not required for grant funds being requested to support a Homeless Management Information System (HMIS) project*

A. Please check the activities for which you are requesting ESG funds and indicate the proposed number to be served. If the project was funded in FY2017-FY2018, please complete all columns. If the project served less than the proposed number in FY2017-FY2018, provide an explanation of why the number was not achieved and what the project plans to do differently.

Eligible Activity | Program Request (check box if applying for this program) | Proposed Number to be Served | FY2017-FY2018 Data (if applicable)
| --- | --- | --- | ---
| | | Proposed number to be served | Actual number served |
| Street Outreach | ☐ | | |
| Emergency Shelter | ☐ | | |
| Operations | | | |
| Homeless Prevention | ☐ | | |
| Rapid Re-Housing | ☐ | | |
| HMIS | | | |

FY2018 Explanation (if needed):

B. Please identify the primary populations your ESG program will serve by writing the number of persons in each applicable category. PLEASE DO NOT JUST CHECK BOXES.

| Chronicly Homeless | Persons with HIV/AIDS |
| Transational Age Youth | Elderly |
| Victims of Domestic Violence | Veterans |
| Chronic Substance Abusers | Persons w/ Severe Mental Illness |
| Other Disabled Individuals | Persons in Households with |
Organization Name:
Project Name:

| Adults | Children |

C. Total unduplicated individuals to be served.
   a. Indicate the number of unduplicated adults to be served:
   b. Indicate the number of unduplicated children to be served:

Documented Need

Provide evidence of the need for the services proposed. Include as much data as possible to support your application (include HMIS data). Include relevant statistics such as number of referral calls, number of participants on your priority lists, and time on priority lists. Describe how you will meet the priority needs of homeless individuals or those most at risk of homelessness. (max characters 550)

Project Description:

Linking to Mainstream Services

Describe how your agency will ensure that program participants are assisted in obtaining mainstream services and financial assistance, including housing, social services, employment, education, and youth programs for which participants are eligible. (max. characters 700)
(Not required for grant funds being requested to support a Homeless Management Information System [HMIS] project)

Examples include Social Security Income, Social Security Disability Income, SNAP assistance (food stamps), Section 8, etc. If your agency serves homeless families with children or unaccompanied youth, also describe how your agency ensures that children are enrolled in school, connected to appropriate services, and aware of their eligibility for McKinney-Vento education services.

Assistance with Increasing Employment Income

Describe how your agency will assist program participants to gain access to necessary training, skill development and employment opportunities. (max. characters 700)
(Not required for grant funds being requested to support a Homeless Management Information System [HMIS] project)

Housing Stability

HCCSC Board Approved 11/13/18 Recipient Approval and Evaluation Committee DRAFT
Organization Name:
Project Name:

What will be your agency’s strategy for ensuring that participants receive individualized assistance to best meet their needs for housing stability? (max. characters 700)
[Not required for grant funds being requested to support a Homeless Management Information System [HMIS] project]

Statement of Work/Scope of Services

This information will be used to structure the scope of services portion of the funding agreement with the City of Canton, if your project is selected for funding.

Develop a sound statement of work/work plan narrative that details the service activities the program will undertake to achieve the program’s goals. Include the following:

- Service activity plan of action of each Service Activity to be provided (i.e. prevention, rapid re-housing, street outreach, basic shelter);
- Coordination of intake and referral procedures with HCCSC’s Coordinated Entry and HMIS and other service providers;
- Use of HMIS to track participant information;
- Program location(s) and hours of operation;
- Program evaluation, specific performance measures and outcomes to evaluate the success of your program;
- Program specific procedures and guidelines;
- Explanation of how your organization will involve homeless persons in the operations of the ESG-funded program;
- ([AHMIS applicants for HMIS projects only] Description of reports your project will produce to show system-wide outcomes and explanation of how project staff will participate in analyzing them to identify areas of improvement or system gaps.

If undertaking renovation, detail the type of renovation to be undertaken along with detailed work write-up and cost estimates.

Collaboration with the CoC

[HCCSC Board Approved 11/13/18Recipient Approval and Evaluation Committee DRAFT]
Does your program collaborate with the Homeless Continuum of Care of Stark County (HCCSC)?

☐ Yes  ☐ No

If yes, explain specific collaborative efforts with the HCCSC including the various committees on which your agency’s staff serve. (max. characters 700)
### Project Funding/Budget

Complete all budget charts.

#### Summary Budget

<table>
<thead>
<tr>
<th></th>
<th>Homelessness Prevention</th>
<th>Rapid Re-Housing</th>
<th>Emergency Shelter</th>
<th>Street Outreach</th>
<th>HMIS</th>
<th>Total Amount Budgeted</th>
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<tr>
<td>Rental Assistance*</td>
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<td>Housing Relocation &amp; Stabilization Services**</td>
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<td>Essential Services</td>
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<td>Renovation</td>
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<tr>
<td>Shelter Operations</td>
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<tr>
<td>Relocation Assistance</td>
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<tr>
<td>Other Services</td>
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<tr>
<td><strong>TOTAL</strong></td>
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</tbody>
</table>

*Includes short and medium-term rent payments and up to 6 months of arrears

**Includes all other eligible forms of direct financial assistance under Prevention and Re-Housing plus costs related to eligible services.

All activities must provide 1:1 cash match. Please identify sources of committed and pending match in the Match chart below.

#### Match Detail

<table>
<thead>
<tr>
<th>Source</th>
<th>Amount</th>
<th>Cash or In-Kind</th>
<th>Committed *** (include Date of commitment)</th>
<th>Pending *** (include date of Application/Request)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
<td><strong>TOTAL</strong></td>
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</tbody>
</table>

*** Documentations must be provided to confirm committed and pending match as follows:

- Committed match sources - signed grant agreements, award letters/notifications or letters of commitment covering the match listed above to be received for the project requesting funds and expended during the operating year of the **FY2019-FY2020** grant if awarded.

- Pending match sources - written and dated correspondence with pending match source which includes amount being requested (as identified above) and confirmation that the pending match is being requested for the project requesting funds and for expenditure during the operating year of the **FY2019-FY2020** grant.
## Budget Detail

<table>
<thead>
<tr>
<th>Category Breakdown</th>
<th>ESG FUNDING REQUEST</th>
<th>Match Funds</th>
<th>Source of Match Funds</th>
<th>Total Funds</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Personnel</strong> – Eligible under all Project Types – May be listed in Personnel and in additional categories below to detail specific activities where applicable</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Salaries &amp; Benefits</td>
<td></td>
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<tr>
<td>Street Outreach</td>
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<tr>
<td>Coordinated Entry</td>
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<tr>
<td>Engagement</td>
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<tr>
<td>Case Management</td>
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<tr>
<td>Other Eligible Activity (please specify)</td>
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<tr>
<td>Other Eligible Activity (please specify)</td>
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<tr>
<td>Street Outreach Subtotal</td>
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<tr>
<td><strong>Prevention and Rapid Rehousing ONLY – Direct Financial Assistance</strong></td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>Short- &amp; Medium-Term Rental Assistance</td>
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<tr>
<td>Security Deposits</td>
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<tr>
<td>Utility Deposits</td>
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<tr>
<td>Utility Payments</td>
<td></td>
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<tr>
<td>Moving Costs</td>
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<tr>
<td>Other Eligible Activity (please specify)</td>
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<tr>
<td>Financial Assistance Subtotal</td>
<td></td>
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</tr>
<tr>
<td><strong>Prevention and Rapid Rehousing ONLY – Housing Relocation and Stabilization Services</strong></td>
<td></td>
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<tr>
<td>Coordinated Entry</td>
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<tr>
<td>Case Management</td>
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<tr>
<td>Housing Search/Placement</td>
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<tr>
<td>Legal Services</td>
<td></td>
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<tr>
<td>Budgeting &amp; Credit Repair</td>
<td></td>
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<tr>
<td>Other Eligible Activity (please specify)</td>
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<tr>
<td>Services Subtotal</td>
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<tr>
<td>Shelter Renovations</td>
<td></td>
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<tr>
<td>Renovation expenses</td>
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<tr>
<td><strong>Shelter Operations</strong></td>
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<tr>
<td>Maintenance</td>
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<tr>
<td>Rent</td>
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<td>Security</td>
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<tr>
<td>Equipment</td>
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<tr>
<td>Insurance</td>
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<tr>
<td>Utilities</td>
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<tr>
<td>Other Eligible Activity (please specify)</td>
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<tr>
<td><strong>Operations Subtotal</strong></td>
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<tr>
<td><strong>Shelter Essential Services</strong></td>
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<tr>
<td>Coordinated Entry</td>
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<td>Case Management</td>
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<td>Other Eligible Activity (please specify)</td>
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<tr>
<td><strong>Essential Services Subtotal</strong></td>
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<tr>
<td><strong>HMIS</strong></td>
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<tr>
<td>HMIS activities</td>
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<tr>
<td><strong>Total ESG Request</strong></td>
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<tr>
<td><strong>Total Other Funds</strong></td>
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<tr>
<td><strong>Grand Total</strong></td>
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</tbody>
</table>

NOTE: Complete Budget Detail – Personnel Costs below if staff costs are included in your application.

Please show all proposed staff positions funded with ESG funding that relate to the proposed activity. If multiple staff members have the same position/title, list separately (ex. Case Manager 1, Case Manager 2).
### Budget Detail – Personnel Costs

<table>
<thead>
<tr>
<th>Position Title</th>
<th>Current or Proposed Position</th>
<th>Annual Salary</th>
<th>Annual Fringe Benefits</th>
<th>Total Annual Salary</th>
<th>Multiplied by % Time Spent on ESG Program</th>
<th>Total Position Costs Requested from ESG</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example – Case Manager</td>
<td>Current</td>
<td>$25,000</td>
<td>$5,000</td>
<td>$30,000</td>
<td>X 40%</td>
<td>$12,000</td>
</tr>
</tbody>
</table>

### Cost per person served

<table>
<thead>
<tr>
<th>Emergency Solutions Grant (ESG)</th>
<th>Program Year FY2019 FY2020 Request</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. ESG Funding Request</td>
<td></td>
</tr>
<tr>
<td>2. Total Program Budget</td>
<td></td>
</tr>
<tr>
<td>3. ESG Request as % of Program Budget (item 1 divided by item 2)</td>
<td></td>
</tr>
<tr>
<td>4. Unduplicated Participants to be Served (Not required for grant funds being requested to support a Homeless Management Information System [HMIS] project)</td>
<td></td>
</tr>
<tr>
<td>5. Total Program Costs Per Participant (item 2 divided by item 4) (Not required for grant funds being requested to support a Homeless Management Information System [HMIS] project)</td>
<td></td>
</tr>
<tr>
<td>6. Total ESG Cost Per Participant (item 1 divided by item 4) (Not required for grant funds being requested to support a Homeless Management Information System [HMIS] project)</td>
<td></td>
</tr>
</tbody>
</table>
ADDITIONAL DOCUMENTS

Additional documents required with the application:

- Organizational chart with all vacancies indicated
- Position descriptions for all affected staff positions
- Applicant’s most recent audit report and most recent financial statement (must be after 2017 or 2018)
- Applicant’s operating budget for the current year
- Internal Revenue Service 501(c) designation
- Articles of Incorporation
- Agency code of regulations by-laws
- Certificate of Good Standing from the Secretary of State (current year)
  - List of all current members of the organization’s board of directors
  - Last three months of board minutes, including attendance
- Copy of the organization’s conflict of interest policy/questionnaire

Approved projects also may be required to show:

- Property deeds
- Proof of insurance
- Current Fire Inspection Certificate for each facility that funds are being requested for
- Certificate of occupancy for each facility that funds are being requested for
- Various other documents as required

ATTACHMENTS REQUIRED

Attachment I – A statement describing the accessibility of every facility to be assisted with ESG funds. If a facility does not meet the Federal accessibility guidelines and standards, the applicant must submit a detailed plan for sheltering a disabled person.

Attachment II – A summary of the applicant’s goals for assisting participants and the community must be submitted.

Attachment III – A copy of your participant termination policy must be submitted.

Attachment IV – A statement of services provided to participants and whether the service is a part of your agency’s in-house program or provided through linkages with other agencies or service providers in the community must be submitted. Include either 1) brochures or pamphlets describing your in-...
Organization Name:
Project Name:

house program or 2) a statement on agency letterhead from the Executive Director or Board President.

Attachment V – Request for proof of the following information: in good standing with the City for grants previously received; in good standing with the City of Canton and Stark County in payment of city income tax, real estate taxes, personal property taxes, water and sewer charges or other city assessments for any properties owned within the City of Canton. (See attached Affidavit for this attachment.)

Attachment VI – Bidder and Contractor Employment Practices Report

Certification

I CERTIFY THAT THE INFORMATION CONTAINED IN THIS APPLICATION IS TRUE AND CORRECT AND THAT IT CONTAINS NO FALSIFICATIONS, MISREPRESENTATIONS, INTENTIONAL OMISSIONS, OR CONCEALMENT OF MATERIAL FACTS. I FURTHER CERTIFY THAT NO CONTRACTS HAVE BEEN AWARDED, FUNDS COMMITTED, OR CONSTRUCTION BEGUN ON THE PROPOSED PROGRAM AND THAT NONE WILL BE DONE PRIOR TO ISSUANCE OF A RELEASE OF FUNDS BY THE CITY OF CANTON.

______________________________
Signature of CEO/Executive Director

______________________________
Date

______________________________
Print Name

______________________________
Title
Emergency Solutions Grant

2019-2020 Scoring Sheet

Project Information

<table>
<thead>
<tr>
<th>Threshold #</th>
<th>THRESHOLD Scoring Elements</th>
<th>Scoring Description and Minimum Threshold Requirement</th>
<th>Possible Score</th>
<th>Actual Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Agree to comply with all HEARTH, HMIS &amp; Coordinated Entry requirements</td>
<td>Applicant must read and certify that agency agrees to abide by all ESG requirements (* Victim Service Providers are exempt from HMIS and Coordinated Entry participation but must maintain an internal database which captures all HMIS data elements.)</td>
<td>Checkmark Or No Checkmark</td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td>Compliance with Homeless Definitions</td>
<td>Description of how project will ensure and document compliance with HUD’s definition of homelessness for participants. Applicant must provide a plan and process for certifying compliance in order to receive a minimum passing score of 5 points. To receive maximum points, plan must be clear and precise and/or already operating successfully.</td>
<td>0 5 10 (Can only select 0, 5, or 10 for score)</td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>Match</td>
<td>Document committed and/or pending match. Applicant must have at least 1:1 pending to receive a checkmark necessary to meet minimum threshold.</td>
<td>Checkmark Or No Checkmark</td>
<td></td>
</tr>
</tbody>
</table>

*The first 3 scoring elements are the threshold requirements. Applicants must meet the minimum passing score indicated in these 3 areas in order for their application to be considered for funding.*
Recipient Approval And Evaluation Committee - DRAFT

Threshold SUB-TOTAL

Applicant must meet minimum threshold requirements explained above to receive threshold passing score. Applicants must have 2 checkmarks and a score of at least 5 to meet threshold requirement.

If threshold criteria are met continue scoring for other elements and TOTAL SCORE

<table>
<thead>
<tr>
<th>OTHER Scoring Elements</th>
<th>Scoring Description</th>
<th>Possible Score</th>
<th>Actual Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Previous Experience &amp; Capacity</td>
<td>Experience in the field, compliance with previous funding requirements, violations, pay back and/or underutilization of previous funds awarded within the original grant period: 0 – Lacks experience and/or capacity to administer a federal/state grant; 5 – Has had to pay back some funds, had compliance issues, and/or underutilized grant funds within the original grant period; 10 – Experience with federal/state grants with no repayment of funds required to date. (Source of information: project’s 2019-2020 ESG Application, monitoring reports, and documentation from City of Canton and Collaborative Applicant)</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>Target Populations</td>
<td>Evidence from the application will be considered to determine the extent to which the program intends to serve members of targeted subpopulations within HUD’s Opening Doors Target Populations (Chronically Homeless, Veterans, TAY, Families with Children). (if applicable) (Source of data: project’s 2019-2020 ESG Application)</td>
<td>1 point will be awarded for each 10% of participants to be served that fall within the subpopulation targeted by Opening Doors.</td>
<td>Up to 10 points</td>
</tr>
<tr>
<td>Linking to Mainstream Services</td>
<td>Description of how program will assist participants in obtaining mainstream services, benefits, and non-employment income (if applicable): 0 – Lacks strong plan to link participants with mainstream services or record of success relevant to this criterion in this or similar projects. 5 – Has a strong plan and some record of success with this or similar projects. 10 – Has strong plan and strong record of success with this or similar projects.</td>
<td>0</td>
<td>5</td>
</tr>
</tbody>
</table>
**Organization Name:**
**Project Name:**

| Assistance with Increasing Employment Income | Description of how program will assist participants in accessing assistance needed to increase employment income (if applicable):  
0 – Lacks strong plan to increase participants’ employment income or record of success relevant to this criterion with this project or similar projects.  
5 – Has a strong plan and some record of success with this or similar projects.  
10 – Has strong plan and strong record of success with this or similar projects.  
(Source of information: project’s 2019-2020 ESG Application) | 0  
5  
10  
(Can only select 0, 5, or 10 for score) |
| Housing Stability | Description of how project will assist participants in maintaining housing stability (if applicable):  
0 – Lacks strong plan for stability or no record of success relevant to this criterion in this project or similar projects.  
5 – Has a strong plan and some record of success with this or similar projects.  
10 – Has strong plan and strong record of success with this or similar projects.  
(Source of information: project’s 2019-2020 ESG Application) | 0  
5  
10  
(Can only select 0, 5, or 10 for score) |
| Statement of Work | Description of scope of services / work plan:  
0 – Fails to address all the required elements;  
5 – Addresses all the elements but responses are weak with respect to three or more of those elements;  
10 – Addresses all the elements but responses are weak with respect to at least one but less than three of those elements;  
15 – Addresses all the elements clearly and in way that suggests the program will be successful in fulfilling expectations.  
(Source of information: project’s 2019-2020 ESG Application) | 0  
5  
10  
15  
(Can only select 0, 5, 10, or 15 for score) |
<table>
<thead>
<tr>
<th>Collaboration with the CoC</th>
<th>Membership on the CoC, participation in a CoC Committee or the CoC Board. Points awarded will depend on the organization’s participation in and collaboration with the HCCSC system as a whole and the extent to which the organization provides personnel to contribute to committees and workgroups that benefit the system as a whole: 0 – Not a member of the HCCSC; 5 – A member who is not active in other committees associated with the HCCSC; 10 – Member who is active on one or more HCCSC committee(s). (Source of information: project’s 2019 2020 ESG Application, Collaborative Applicant documentation)</th>
<th>0</th>
<th>5</th>
<th>10</th>
<th>(Can only select 0, 5, or 10 for score)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Budget</td>
<td>Score will be based on expenses per Board participant charged to the ESG grant compared with the average for other projects of the same type (if applicable): 0 – Project whose average cost exceeds the average for similar projects by 10% or more 5 – Project whose average cost is greater or lesser than the average for similar projects by less than 10% 10 – Project whose average cost falls below the average for similar projects by 10% or more (Source of information: project’s 2019 2020 ESG Application)</td>
<td>0</td>
<td>5</td>
<td>10</td>
<td>(Can only select 0, 5, or 10 for score)</td>
</tr>
<tr>
<td>Sub-Total Score: Threshold #2</td>
<td>Score is carried forward from the Threshold Criteria</td>
<td>5</td>
<td>10</td>
<td>(Can only select 5 or 10 for score)</td>
<td></td>
</tr>
</tbody>
</table>

| TOTAL SCORE POINTS | 95 |
| TOTAL SCORE | Points earned as a percentage of total points available to the project | 100% |

Additional Notes/Recommendations:
## Cross-Cutting Objectives

<table>
<thead>
<tr>
<th>Action Area</th>
<th>Objective</th>
<th>Policy, Funding, or Practice Change?</th>
<th>Timeline and Measure of Success</th>
<th>Person(s) or Organization(s) Responsible</th>
</tr>
</thead>
</table>
| Affordable Housing: Increase Supply of Safe, Quality Affordable Housing in Stark County | 1. Partner with City and County to leverage CDBG funding to improve safety and quality of existing affordable housing units. Educate landlords on how to access funding.  
2. Create a set-aside in new developments and/or developer fee to establish a Stark County Housing Trust that will increase quality affordable housing units in the County.  
3. Inventory current affordable housing units. | Funding, Policy, and Practice | • Increase exits to mainstream affordable housing units by 5% per year beginning in 2020.  
• 100 affordable units are preserved or created each year beginning in 2020.  
• Inventory is available and accessible by 2020. (Note: OHFA has a published list of affordable units by County) | Community collaboration including Stark Housing Network, CoC Board and providers, County and entitlement cities, banks, land bank, Habitat for Humanity, health department, SMHA. |
| Data and Accountability | 1. Increase capacity and use of data to improve system responses including data entry and extraction. | Policy and Practice | • Incorporation of additional benchmarks  
• Production of at least annual dashboard reports to the community. | HMIS lead agency, CoC providers. |
| Employment | 1. Increase employment income among all adults in housing programs through the CoC.  
2. Offer work experience opportunities for individuals who have low skills and no work history.  
3. Include employability factors in housing assessment and conduct joint referrals to housing and workforce system through crisis response programs. | Policy and Practice | • Facilitate discussion with Workforce partners to explore employment assessment by 12/31/2019.  
• Explore and/or implement assessment tools and referral structure by 7/1/21. | Workforce Board, HMIS, and CoC Providers |
# Stark County Strategic Plan Worksheet

**Group Name:** Families

<table>
<thead>
<tr>
<th>Action Area</th>
<th>Objective</th>
<th>Policy, Funding, or Practice Change?</th>
<th>Timeline and Measure of Success</th>
<th>Person(s) or Organization(s) Responsible</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing Intervention investments</td>
<td>1. Create 18 Rapid Rehousing slots for families exiting shelter.</td>
<td>Funding, Policy, and Practice</td>
<td>• New units in the pipeline or operational by 2022.</td>
<td>Stark Housing Network, CoC providers, SMHA, private funders</td>
</tr>
<tr>
<td></td>
<td>2. Develop or secure 27 more supportive housing units for families.</td>
<td></td>
<td>• New RRH slots through CoC bonus or by reducing length of stay in RRH (i.e. more families can be served if LoS is shorter) due to higher need families served in new PSH units. (2022)</td>
<td></td>
</tr>
<tr>
<td>Targeting Housing Interventions and Reducing Recidivism</td>
<td>1. Analyze recidivism data from RRH to identify trends and opportunities for improvement; determine if scoring tools are effectively matching families to appropriate interventions.</td>
<td>Practice and Funding</td>
<td>• Reduce recidivism by 30% by 2022.</td>
<td>Stark Housing Network, local funders, Fair Housing</td>
</tr>
<tr>
<td></td>
<td>2. Sustain and/or expand local diversion program that is effectively serving 65 households per month.</td>
<td></td>
<td>• Divert 40% of households seeking shelter annually beginning in 2020 (FY or CY?).</td>
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</tr>
<tr>
<td></td>
<td>3. Provide fair housing training to tenants as part of the diversion and rapid rehousing programs.</td>
<td></td>
<td>• 100 families (households or persons) per year participate in fair housing trainings.</td>
<td></td>
</tr>
</tbody>
</table>
### Workgroup: Veterans

<table>
<thead>
<tr>
<th>Action Area</th>
<th>Objective</th>
<th>Policy, Funding, or Practice Change?</th>
<th>Timeline and Measure of Success</th>
<th>Person(s) or Organization(s) Responsible</th>
</tr>
</thead>
</table>
| Data Sharing                 | 1. Improve data sharing between the VA and CoC providers.  
2. Update veteran coordinated entry processes. | Policy and Practice                  | • VA gains access to HMIS by 10/1/19  
• VA will participate in CoC By Name List review by 10/1/19. | VA and Coordinated Entry Specialist                      |
| Housing Intervention Investments | 1. Increase Rapid Rehousing slots by 4/year.  
2. Increase PSH units by 52 (15% of identified PSH need) over three years for non-VA eligible veterans.  
3. Implement diversion practices among veterans seeking RRH and/or shelter | Practice and funding                 | • Monthly monitoring through By Name List to assess and maximize utilization.  
• Produce reports from HMIS to determine utilization.  
• 52 units in operation or added to the pipeline by 2022.  
• 10% veterans seeking shelter or RRH are diverted each year beginning 10/1/19 | VA, CoC, and SMHA                                           |

### Workgroup: Single Adults

<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>Housing Interventions Investment</td>
<td>1. Increase PSH capacity by 137 units over three years to serve non-chronic, high need single adults.</td>
<td>Funding</td>
<td>• New PSH units added to the pipeline or operational by 2022.</td>
<td>CoC, local providers, and SMHA</td>
</tr>
<tr>
<td>Action Area</td>
<td>Objective</td>
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</tbody>
</table>
| Housing Intervention Investments | 1. Increase Youth-specific PSH units by 24 over three years.  
2. Increase RRH slots for youth by 5/year or 15 in three years. | Funding or Policy                    | • PSH units added to the pipeline or operational by 2022.  
• RRH slots available by 2022. | CoC, DSA, and local providers. |
| Shelter Service Enhancements | 1. Increase youth-specific services available in shelter programs.  
2. Increase communication and involvement between DYS, JFS, and Family Courts. | Funding and Practice                 | • Decrease percentage of youth in ES only without exiting to permanent destinations by 5% per year.  
• Reduce recidivism to shelter annually by 3%/year. | State of Ohio, CoC, JFS, Family Courts, DYS, and local providers |
HOMELSS CONTINUUM OF CARE OF STARK COUNTY
Stark County Strategic Plan Worksheet

Workgroup: Chronic

<table>
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<tr>
<td>Housing Prioritization</td>
<td>1. Identify and prioritize for PSH individuals with at least 9 months documented homelessness and high SPDAT scores.</td>
<td>Practice</td>
<td>• End Chronic Homelessness by 2020</td>
<td>CoC and local providers</td>
</tr>
</tbody>
</table>

TOTAL: Housing Intervention Investments Required by End of Year 2022 to END HOMELESSNESS in Stark County

<table>
<thead>
<tr>
<th>Subpopulation</th>
<th>Rapid Rehousing Units</th>
<th>Permanent Supportive Housing Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Families</td>
<td>18</td>
<td>27</td>
</tr>
<tr>
<td>Veterans</td>
<td>16</td>
<td>52</td>
</tr>
<tr>
<td>Singles</td>
<td>89</td>
<td>137</td>
</tr>
<tr>
<td>Youth</td>
<td>15</td>
<td>24</td>
</tr>
<tr>
<td>TOTAL UNIT NEED TO END HOMELESSNESS BY 2022</td>
<td>138</td>
<td>240</td>
</tr>
</tbody>
</table>