

**HOMELESS CONTINUUM OF CARE OF STARK COUNTY
BOARD MEETING
Tuesday, February 11, 2020
9:30am at the Community Campus at Goodwill
Meeting Minutes**

Members Present

Lynne Dragomier
John Aller
Lisa Warden
Danelle Lightner
Rollin Seward
Maria Heege
Julie Sparks

Members Not Present

Captain John Gabbard
Kim Kroh
Steve Inchak
JoAnn Breedlove

SHNI

Marcie Bragg
Melissa Terrell

Guests

Shannon McMahon Williams
Beverly Lewis
Marty Chumney
Cathy Jennings
Cheli Curran
Shirene Starn-Tapyrik

Jennifer Keaton, StarkMHAR
Matthew Slater, Family Community Services (FCS)

I. Welcome and Introductions

At 9:31 a.m., Marcie Bragg, Board Chair, called the meeting to order. Marcie welcomed meeting guests Jennifer Keaton, Stark Mental Health and Addiction Recovery (StarkMHAR) Partner Solutions and Matthew Slater, Family and Community Services (FCS). Jennifer Keaton will discuss the Ohio Data Warehouse updates with board members. Matthew Slater will be introducing a Supportive Services for Veterans Families (SSVF) project and submitting a request for a Continuum of Care (CoC) letter of support for this project.

II. Approval of January 2020 Meeting Minutes

Motion: Marcie requested a motion to approve the January 2020 Homeless Continuum of Care of Stark County Board meeting minutes as presented. Maria motioned to approve. Julie seconded the motion and it was carried by all members present.

At 9:33am, Lynne Dragomier entered the meeting.

III. Conflict of Interest Policy

Marcie reminded 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.

IV. New Transitional Housing for Veterans in Stark County (See Attachment 1)

Stark Housing Network, Inc. Program Administrator and Veteran Coordinator, Melissa Terrell, introduced Matthew Slater to the HCCSC Board members. Matthew is the Director of Veteran Services for Family and Community Services (FCS) which has served eight counties in northeast Ohio for over 75 years. Services offered through this organization range from basic needs to counseling services. FCS operates the Supportive Services for Veteran Families (SSVF) program which gives Stark County access to assistance with Homeless Prevention, Rapid Rehousing (RRH), and aides Veterans with stabilization services. During the HCCSC's Strategic Plan, the need to increase partnerships and data sharing between the veteran organizations and the HCCSC was identified as an objective

. Through increased coordination, and assistance from other veteran agency partnerships, the HCCSC was able to reduce the number of active veterans on the benchmark (housing priority list) from 56 to 8 in less than one year. Matthew is presenting a new Transitional Housing (TH) opportunity for Veterans in Stark County through FCS

and seeking a letter of support from the CoC. The letter of support will go to the Recipient Approval and Evaluation Committee for review prior to the HCCSC Board's final approval. Today is an introduction to the new TH opportunity that may be available for Stark's veteran population. Currently there are three buildings, 16 units/beds, in Stark (33rd St., 34th St., and Maxine Ave.) that are converting into housing for Veterans.

At 9:37am, Lisa Warden entered the meeting.

Matthew provided the HCCSC Board members with an example letter of support that includes an ask for 100 Grant Per Diem (GPD) beds total, 16 of which would be located in Stark County. FCS is required to include the entire ask in the letter of support, when seeking funds through the Veterans Administration (VA), to cover units/beds in multiple counties. GPD project models receive a standard dollar reimbursement amount per day for each participant; if awarded, the grant will reimburse FCS for each day a participant is in the project. FCS will offer 16 units/beds for Stark County's Veterans with 24 hour, 7 days a week staff members available for assistance. FCS application request will allow flexibility in the target population for these units; the beds could be utilized for males, females and/or families; FCS is emphasizing unit/beds utilization for females and families. Additionally, the grant will provide aftercare for participants that need further stabilization supports. The project will follow a Housing First, TH model with an average length of time being 3-9 months; this average length of time was determined by a higher exit rate from similar SSVF projects in other counties and partnerships with supportive service agencies. Matthew stated that the national average for length of time in similar projects is around 180 days, and currently, similar SSVF projects are operating at an average of 140 days.

FCS is seeking operating funds through the VA and is not looking to secure Continuum of Care or Emergency Solutions Grant funds from Stark County. There are currently 74 units already in operation in other counties and this grant would be considered an expansion grant. The program will emphasize the 3-9 month length of stay, however, participants will be able to stay in the housing for up-to 24 months under the TH model. This project is required to adhere to the VA's character of discharge standards to receive the funding, however, FCS can take a participant without payment by invoking humanitarian approvals for veterans with a less than honorable discharge status. The FCS grant application is due the first week of March and FCS is requesting a letter of support from the CoC to submit with the application.

Motion: Marcie requested a motion to vote on the Family Community Services' Letter of Support via email after submitting the letter to the Recipient Approval and Evaluation Committee for review and approval. Shirene motioned to approve. Shannon seconded the motion and it was carried by all members present.

At 9:52am, guest Matthew Slater exited the meeting.

V. Approval of Recipient Approval and Evaluation Committee (RAEC) Policy Revisions

- a. C.1 Policies for Review and Endorsement of New Programs Serving the Homeless (*See Attachment 2*)
 - i. The RAEC did not recommend any revisions to this policy. The policy was reviewed by committee members and given an updated approval date.
- b. C.3 Procedures for Inviting and Reviewing Applications for CoC Funding (*See Attachment 3*)
 - i. The RAEC made the following revisions to this policy: added language clarifying that HCCSC Members listserv would receive information; included language that annual performance reports are submitted to the collaborative applicant; replaced collaborative with consolidated in areas that the terms were used interchangeably; and added that the HMIS Lead will assist the collaborative applicant rather than the HMIS assisting the collaborative applicant.
- c. C.4 Procedures for Monitoring and Reviewing CoC-Funded Project (*See Attachment 4*)
 - i. The RAEC made minor revisions to this policy that included fixing two grammatical errors and adding language to include *Report (APR)* in section I.B.2.
- d. C.5 Status Report Form for CoC Funded Projects (*See Attachment 5*)
 - i. The RAEC made a few small revisions to this policy. A sixth question was added under the project update section to solicit additional information that the project may want to provide the

collaborative applicant. There was additional language added to the Rapid Rehousing (RRH) section soliciting projects to provide successes of and/or continue to meet the local target for length of time between intake and housing; numerical data from the annual performance report is requested with this information so projects can gauge if this target is being met each quarter.

Motion: Marcie requested a motion to approve the Homeless Continuum of Care of Stark County policy revisions to *C.1 Policies for Review and Endorsement of New Programs Serving the Homeless*, *C.3 Procedures for Inviting and Reviewing Applications for CoC Funding*, *C.4 Procedures for Monitoring and Reviewing CoC-Funded Project*, and *C.5 Status Report Form for CoC Funded Projects* as revised. John motioned to approve. Maria seconded the motion and it was carried by all members present.

IV. Discussion of Ohio Data Warehouse and HMIS Data Sharing

The HCCSC Board has previously discussed the Ohio Data Warehouse and Stark County being the only county in Ohio not contributing data to the warehouse due to concerns about participant confidentiality and unclear processes on data matching. StarkMHAR's Attorney, Christina Shaynak-Diaz, has attempted to work with the Ohio Housing Finance Agency (OHFA) on either changes to the agreement that reflects the actual process and/or adding an addendum to the agreement. It was reported to the Board that the YWCA's Ohio Development Services Agency (ODSA) grant agreement had a condition placed on funding which required Stark County to contribute data to the warehouse by June 2020. The HCCSC Board requested to add an addendum to the data warehouse policy; the current policy does not accurately reflect the process. Katie Fallon, Director of Housing Policy at OHFA, presented Stark's addendum to OHFA's Board, however the addendum was not accepted. Attorney Christina Shaynak-Diaz reviewed OHFA's data agreement and supplemental documentation to ensure that Stark County is able sign the data warehouse agreement, without adding the addendum to the data warehouse policies, and still remain protected under the current HCCSC User Agreement. Christina Shaynak-Diaz determined that Stark County is able sign the Data Warehouse Agreement under Stark's current User Agreement. The HCCSC will move forward with providing the data and signing the agreement.

Marcie thanked Jennifer Keaton for her hard work and dedication to ensuring that the HCCSC's HMIS participant information remains confidential.

V. Approval of System (HMIS & Coordinated Entry System) Policy Revisions

The HMIS policies and agreements were focused on the HMIS database and were not inclusive of the Coordinated Entry System (CES) processes. CES utilizes Google Docs for emergency shelter referrals and to hold the Permanent Supportive Housing (PSH) and Rapid Rehousing (RRH) Prioritization List. The HMIS Committee agreed that the policies and agreements should capture both systems.

- a. E.2 Agency Partner Agreement
 - i. The HMIS Committee made a small revision to this policy that included utilizing the word "System" in place of HMIS System. Additionally, the HMIS Committee is recommending to add an "Authorized Signatory" for authorization of different titles, other than the Executive Director, to sign the agreement on behalf of the agency.
- b. E.3 Participant Informed Consent and Release of Information Authorization
 - i. The HMIS Committee made a small revision to this policy that included utilizing the term "HCCSC System Privacy Notice" in place of HMIS System Privacy Notice.
- c. E.4 System Privacy Notice
 - i. The HMIS Committee made one small revision to this policy that included utilizing the word "System" in place of HMIS System.

Discussion: The Board members discussed the E.2 Agency Partner Agreement and inquired if the "Authorized Signatory" should have a line to provide their title at the agency. Board members agree that the policy signature page should include a line for the Title of Authorized Signatory.

Motion: Marcie requested a motion to approve the Homeless Continuum of Care of Stark County policies *E.2 Agency Partner Agreement*, *E.3 Participant Informed Consent and Release of Information Authorization*, and *E.4 System Privacy*

Notice with the recommendation to include a line for the Title of Authorized Signatory for policy E.2 Agency Partner Agreement. Lynne motioned to approve. Beverly seconded the motion and it was carried by all members present.

VI. Old Business

N/A

VII. New Business

- a. Over the past few months, Homeless Navigation and the Domestic Violence Project, Inc. (DVPI) have discussed how the integration of information on victims of domestic violence into the CES can be keep more confidential. These agencies have come together to work on a process that will not disclose victims' names, whom are fleeing domestic violence in emergency shelters, to any housing provider during the weekly, Friday By Names meetings. Additionally, the HCCSC's Prioritization List for RRH and PSH will not disclose any identifying information and Homeless Navigation will hold the master Prioritization List. The change in the HCCSC's CES processes began last Friday.
- b. Shirene informed the Board members of the Governor's budget that is providing \$600 million to the Department of Education and stated that there is an opportunity for homeless prevention activities. Canton City Schools Homeless Liaison, Lisa Warden, discussed a project that she is attempting to operationalize that will be a one-stop shop for families with the longest length of homelessness (defined by the education system standards that include doubled-up with friends or family) with focus a on homelessness prevention. The project would supply a Navigator to each family that will follow the family from identification all the way to the children's' graduation and assist the family with basic needs and ensure families are connected to the correct community resources. There would need to be a backbone organization to assist with the operation of this project. Project logistics would have to be determined, however, there is a project out of Kansas City, Kansas that Stark could model the project after. Lisa will be creating a PowerPoint to discuss this project during a future meeting. Shirene offered her assistance with grant writing.
- c. Julie Sparks reported that Marcie attended ICAN's Board meeting and shared a PowerPoint with an overview of the HCCSC to provide a greater understanding of the HCCSC/Stark Housing Network, Inc. (HCCSC's Collaborative Applicant) activities and processes.
- d. A Canton Parks meeting occurred recently and there was discussion regarding homeless living within the parks. It was discussed that there has been a lack of engagement from the homeless system to engage people in unsheltered homeless situations. Through ICAN's PATH team, people who are literally homeless are outreached when identified. There is a small population that are not willing to engage with the PATH outreach team and typically this population suffers with mental health barriers. There may be an opportunity to provide homelessness and mental health education to those that attend the park meetings.

VII. Adjournment

With no further business to be discussed, at 10:51am, the meeting adjourned.

The Stark County Continuum of Care is pleased to add our endorsement for Family & Community Services, Inc. (FCS) application to the U.S. Department of Veterans Affairs' (VA) Grant and Per Diem Program (GPD). FCS has operated VA GPD programs since May 2008. FCS has excelled in providing homeless veterans with GPD services that are not duplicated by any other provider in the community. These services include; creative arts therapy, stress reduction groups, employment integration programming, weekend retreats to the Red Bird Center, and case management . FCS GPD programming meets an important need in the urban and non-urban areas that surround the city of Cleveland and Cuyahoga County. These communities are unique and separate from the systems found in Cleveland and Cuyahoga County.

We understand that FCS is applying for a total of 100 GPD beds, 16 of the beds will be located in Canton, Oh (Stark County). We understand that 45 of the beds will follow the VA's Service Intensive Transitional Housing Model, 35 of the beds will follow the VA's Clinical Treatment Model, and 10 of the beds will follow the VA's Bridge Housing Model, and 10 will follow the VA's Low Demand Model. We also understand that FCS has acquired three buildings and is targeting serving both homeless male and female veterans and families. We believe that there is a need in the city of Canton and the County of Stark for the number of beds that FCS is requesting. We also believe that the SITH, CT, BI, LD model selected by FCS are the ones that are needed in that community, and that FCS will continue to have superior outcomes of veterans gaining housing and income.

It is also important to note that while the agency is requesting SITH, BI, and CT beds its programming already employs low demand methodology. Because FCS is requesting GPD beds in an area where there are limited other housing options it is important to have the flexibility of the SITH model to ensure no veteran stay on the street. FCS has always worked very quickly with the VA and community partners to ensure that veterans in need are placed into a GPD bed as quickly as possible. FCS has also worked very quickly to assist veterans in obtaining permanent housing. They have been able to accomplish this through both their SSVF grant and close partnerships in the community with HUD-VASH staff, VA CRRC staff, Housing Authorities, Department of Job & Family Services, landlords, employers, and other partners from the Continuum of Care. Through these partnerships the agency's GPD programs have always outpaced the national average of GPD permanent housing placements.

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Homeless Continuum of Care of Stark County Policies for Review and Endorsement of New Programs Serving the Homeless

I. Collaboration in Developing Projects to Serve the Homeless

- A. Notifying the Continuum of Plans for New Programs. The Homeless Continuum of Care of Stark County (HCCSC) encourages any organization that is considering developing new programs or services for the homeless to notify the HCCSC's Collaborative Applicant of its intentions as soon as possible. By contacting the HCCSC early about its ideas for a new program, an organization can determine:
1. Whether, through its gaps analyses, the Continuum has confirmed that there is a need for the type of program the organization envisions;
 2. Whether there are opportunities available for collaborations that would reduce the costs or increase the benefits of the contemplated program;
 3. Whether, and under what conditions, the contemplated program is likely to be considered a priority for state or federal grants awarded with the Continuum's endorsement; and
 4. Whether, and under what conditions, the Continuum would endorse the proposed program for grants that might be available from private sources.
- B. Collaborating with The HCCSC and its Partners. An organization seeking help from the HCCSC in securing funding for a new program must keep in mind that the HCCSC is responsible for coordinating an efficient and effective system of care for the homeless in Stark County and that it cannot expect the HCCSC to endorse or champion its new program unless:
1. The organization provides timely notice of its plans to create the program and allows the HCCSC a meaningful opportunity to provide feedback on those plans and elicit feedback from other interested organizations;
 2. The organization demonstrates a willingness to work with the HCCSC and its partners to adjust its plans for new programs to achieve better outcomes or reduce costs for the homeless system; and
 3. The organization makes a commitment to participate in the Homeless Management Information System and support efforts of the HCCSC to meet other requirements of state and federal funding programs.

II. Obtaining HCCSC Endorsement for Funding

- A. Requests for Endorsement in Competitions for Limited Funds. In seeking funding for a new program, an organization may apply for competitive grants that require the HCCSC's endorsement even if it has failed to give the HCCSC timely notice of its plans for the program or a meaningful opportunity to provide feedback on those plans. However, in doing so, the organization should recognize that, in the middle of a grant competition, the HCCSC will have little time to collect additional information needed to resolve any questions about a new program and will be unable to help the applicant refine the program to make it a stronger candidate for endorsement. Accordingly, a program may be at a disadvantage in competing for the HCCSC's endorsement with programs that have been thoroughly vetted by the HCCSC before the competition or have a track record of success in serving the homeless.
- B. Other Requests for Endorsement.
1. Any organization seeking HCCSC endorsement to support an application for funding that is not competing with applications submitted by other HCCSC partners must submit a request for endorsement to the Collaborative Applicant.
 2. The Collaborative Applicant will provide the requested endorsement if:
 - a. The program has been reviewed previously by the Recipient Approval and Evaluation Committee and the Continuum of Care Board and received the HCCSC's endorsement for funding from one or more sources; and
 - b. The Collaborative Applicant has no reason to believe that the facts and circumstances influencing the HCCSC's previous endorsement have changed significantly.
 3. If the program has not been endorsed previously by the HCCSC, the Collaborative Applicant will:
 - a. Gather relevant facts and refer the matter to the Recipient Approval and Evaluation Committee to develop a recommendation for the HCCSC Board;
 - b. Seek Board approval for the Recipient Approval and Evaluation Committee's recommendation; and
 - c. Communicate the Board's decision to the organization requesting the endorsement.

4. If the program has not been endorsed previously by the HCCSC and there is insufficient time to refer the matter to the Recipient Approval and Evaluation Committee and the Board, the Collaborative Applicant will withhold the endorsement but may exercise its discretion to provide to a potential funder factual information that will support a request for funding, such as information about the HCCSC's needs and priorities and its historic support for other programs sponsored by the same organization.

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Procedures for Inviting and Reviewing Applications for CoC funding

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

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

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

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6. The extent to which the project and its sponsoring organization understand and effectively collaborate with the HCCSC by, among other things, participating in relevant committees and workgroups and providing timely notice of proposed additions to or changes in their policies, procedures, or services;
7. The adherence of the project to its own and system-wide rules governing access to and eligibility for the project, including Housing First, Fair Housing, and Equal Access policies; and

The extent to which project staff attend required professional development sessions and pursue other professional development opportunities.

- D. Solicitation of Feedback from HCCSC Members. The System Performance Committee and the Recipient Approval and Evaluation Committee will review their findings and preliminary recommendations with members and consider feedback received from the members before finalizing their recommendations to the Board on CoC funding priorities and CoC application and scoring forms.

II. The Application Workshop

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

- A. Notice of Workshop. Before the annual pre-application workshop, the Collaborative Applicant will:

1. Place an advertisement about the workshop in the three newspapers of general circulation in Stark County; and
2. E-mail a notice of the workshop to all individuals on the HCCSC **Members** listserv.

- B. Workshop Agenda. At the workshop, the Collaborative Applicant will:

1. Review with attendees the application form that all applicants must complete in order to receive HCCSC endorsement to submit an application for CoC funding to HUD;
2. Discuss the procedures and timelines for submitting applications for the local competition;
3. Discuss any special rules applying to organizations that have not received CoC funding previously;
4. Discuss HCCSC priorities as approved by the HCCSC Board;
5. Review the form(s) that will be used to score applications;
6. Discuss any documents required to be submitted with the local application; and
7. Discuss any additional project requirements during the local competition such project presentations and/or project site visits.

III. The Local Application Process

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

The Collaborative Applicant will also:

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

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evaluations in scoring the project on related criteria.

4. For each criterion listed on the scoring form, applications will receive a score based on a consensus reached by the members of the Recipient Approval and Evaluation Committee.
5. A project's final score on the application will be the total points earned by the project as a percentage of the total points available to the project. Points will be considered "available to a project" only if the scoring criterion on which those points are based can be applied to the project.

IV. Notice and Appeal of Committee Decisions on Applications

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

V. Development of Conditional and Final Priority Listings

- A. Approval of a Conditional Priority Listing by HCCSC Board. After the application appeals process has concluded, the Recipient Approval and Evaluation Committee will recommend to the HCCSC Board projects to be included in the Priority Listing that will be submitted to HUD as part of the HCCSC's next Consolidated Application. Barring unforeseen changes in funding criteria or priorities which HUD announces in the CoC Notice of Funding Availability (NOFA) for the year or significant changes in other relevant circumstances the conditional Priority Listing, if approved by the Board, will determine the projects included on the final Priority Listing.
- B. Notice of the Board's Decision. All applicants will receive notice in writing of the Board's decision regarding the projects to be included in the final Priority Listing after that decision is made.
- C. Review of NOFA for Possible Impact on Conditional Priority Listing. After HUD has issued its annual NOFA, the Collaborative Applicant will determine whether projects included on the conditional Priority Listing are eligible for funding and continue to meet HUD funding priorities as reflected in the NOFA. It will also determine whether enough eligible projects have applied to take advantage of all available

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CoC funds. In determining whether enough eligible projects have applied, the Collaborative Applicant will consider applications submitted for projects that were not approved for the conditional Priority Listing as well as applications for projects that were not recommended for full funding.

- D. Publication of Notice of HUD's NOFA. After HUD has issued its annual NOFA, the Collaborative Applicant will publish a public notice that will include:
1. Information about the local application process; and
 2. A request for additional proposals in the event that the most recent local competition yielded an insufficient number of eligible projects to take advantage of available CoC funding.
- E. Second Round of Applications. Following the solicitation of additional applications in accordance with Section D.2, the steps outlined in Section III will be repeated to review and score a second round of applications. In that event, the Collaborative Applicant, in consultation with the Recipient Approval and Evaluation Committee, will exercise its discretion to modify schedules and procedures as necessary to meet the deadline for submission of the final CoC Grant applications.

VI. Preparation of Final Application, Priority Listings, and rankings for Submissions to HUD

A. Deadlines and Instructions for Submitting Final Applications.

1. Unless the NOFA or other changes in circumstances provide any reason to conclude that a project conditionally approved for inclusion on the Priority Listing should not be included in the final listing, the Collaborative Applicant will notify the project applicant of the NOFA's release to begin completing its application in e-snaps.
2. All applicants notified must complete their applications in *e-snaps* in accordance with any instructions given by the Collaborative Applicant.
3. In the following circumstances, the Collaborative Applicant will notify the project applicant to begin completing its application in e-snaps as soon as possible and will adjust the deadline for that application as necessary to meet HUD's deadline for submission of the Collaborative Application:
 - a. Changed circumstances or new information in the NOFA have given rise to questions that must be resolved about whether a project on the conditional Priority Listing should remain on the final listing; and
 - b. The Recipient Approval and Evaluation Committee did not endorse a project for funding until after the NOFA was issued.

- B. Final Review of Applications by Collaborative Applicant. As applications are submitted in e-snaps, the Collaborative Applicant will review the applications to ensure that they conform to the applications approved by the Recipient Approval and Evaluation Committee and that they are complete and, at least on their face, accurate and consistent. If an applicant is required to make any changes, the Collaborative Applicant will return the application via e-snaps with an email explaining needed changes and the deadline for making those changes.

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- C. Preparation of Final Priority Listing. It is the responsibility of the Recipient Approval and Evaluation Committee to develop for HCCSC Board approval:
1. A final list of the projects to be included on the Priority Listing submitted with the Consolidated Application; and
 2. Any other list of recommended projects that HUD requires Continuums to prepare as part of a competition for bonus funds available through the CoC Grant program.
- D. Ranking of Projects. It is also the responsibility of the Recipient Approval and Evaluation Committee to rank those projects, using a method developed by the Committee, reviewed by HCCSC members, and approved by the HCCSC Board each year.
- E. HCCSC Approval of the Consolidated Application. Before submitting the Consolidated Application to HUD, the Collaborative Applicant will solicit HCCSC Board approval for the application as a whole and for its ranking of individual applications. In requesting this approval, the Collaborative Applicant will:
1. Explain to the Board any instances in which the ranking of individual applications was based on factors other than application scores; and
 2. Provide an opportunity for the Board to ask questions, and, based on a majority vote, change the ranking.

VII. Reallocations

- A. Responsibility for Proposing Reallocations. The Collaborative Applicant and Recipient Approval and Evaluation Committee should consider the possibility of recommending that all or part of the CoC funding currently received by a project be reallocated for any good cause, including the following:
1. The project has consistently failed to meet performance standards established by HUD or the HCCSC;
 2. The Collaborative Applicant and HMIS Lead have been obliged to spend a disproportionate amount of time overseeing the project due to its repeated failures to:
 - a. Submit timely and accurate data and reports required by HUD or the HCCSC;
 - b. Follow other policies and procedures prescribed by HUD or the HCCSC; or
 - c. Cooperate with the efforts of the HCCSC to improve the performance of the project or the homeless system as a whole.
 3. The project has repeatedly underspent its CoC funding or otherwise mismanaged its CoC grant;
 4. HUD priorities or policies have changed, putting the project at risk of being defunded;
 5. HCCSC priorities or policies have changed with the result that the project no longer plays the role it previously did in promoting the HCCSC's strategies for ending homelessness;

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6. The project is unusually expensive compared with other projects of its type; or
7. Some or all the funds received by the project can be put to higher and better uses to achieve the HCCSC's goals for ending homelessness.

B. Process for Effecting Reallocations.

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

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Procedures for Monitoring and Evaluating CoC-Funded Projects

I. Evaluation - In General

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

II. Quarterly Status Reporting

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

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1. Status reports will be due to the Collaborative Applicant by the 15th of the month following the end of each quarter of the grant period.
2. Each report will include a financial status update that will be cumulative, covering all quarters of the grant period that have ended before the report's due date.

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

III. Annual Performance Reports to HUD (APRs)

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

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

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

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

V. Annual Site Visits

A. Timing and Scheduling of Site Visits

1. The Collaborative Applicant will conduct an annual site visit with each recipient. In cases where a recipient operates more than one CoC-funded project, the Collaborative Applicant may schedule two or more site visits as necessary to effectively monitor all of the projects.
2. Normally, a site visit will occur approximately 6 months after the beginning of the recipient's grant year. However, it may occur sooner if status reports indicate a need

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for earlier intervention. In cases where a recipient operates two or more CoC-funded projects with different grant years and the Collaborative Applicant chooses to conduct a single site visit to monitor these projects, the Collaborative Applicant will determine the timing of the visit based all relevant factors, including the prior performance of each project that will be monitored and the HCCSC's need for timely information about each.

3. The Collaborative Applicant will contact a recipient to schedule a site visit 30 days before a visit is due and send to the recipient a copy of the monitoring form that the Collaborative Applicant will be using, identifying sections of the form that the recipient must complete before the visit.

B. Purpose of the Visit

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

C. Notice of Deficiencies

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

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

VI. Role of the Recipient Approval and Evaluation Committee

- A. Regular Meetings to Assess Project Performance. The Recipient Approval and Evaluation Committee will meet at least quarterly to receive feedback from the Collaborative Applicant on status reports, APRs, audits and monitoring reports, and the results of site visits in order to determine whether projects are meeting performance goals and other expectations.
- B. Notice to Poor Performers. In the event that a project (1) is not meeting performance goals; (2) did not provide a sufficient explanation for deficiencies identified during a site visit; or (3) did not follow the plan approved by the Collaborative Applicant for correcting such a deficiency, the committee will re-evaluate concerns about the project's performance and, at its discretion, instruct the Collaborative Applicant to send a letter to the funded recipient requesting other or additional correction measures.
- C. Assistance to Poor Performers. The HCCSC, through the Collaborative Applicant and Recipient Approval and Evaluation Committee, will provide reasonable assistance tounderperforming

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recipients by, among other things:

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

D. Action in the Case of Persistent Poor Performance. If, after a recipient has received notices of poor performance over two grant years and, in the judgment of the Recipient Approval and Evaluation Committee, has made insufficient progress in correcting its deficiencies, the committee may, depending on the severity of the deficiencies:

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

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**CoC
QUARTERLY STATUS REPORT**

Project Name:

Agency:

Contact Tel. Number:

Contact Person:

Grant Period (FY and OY):

Report Period (Quarter):

Financial Status Update:

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

Do you expect an underutilization of funds? YES NO

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

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

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

Project Update:

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

Performance Outcomes Update:

Please answer where applicable to project type:

1. **ALL PROJECTS:** Describe any issues you are having with the HMIS system and/or data entry within your project(s) in general:
2. **RRH Projects ONLY-** Shortening the length of time between Intake and Housing Placement- Describe activities carried out to ensure that participants are quickly accessing housing. Local target, from time of entry into the rapid rehousing project to being housed, is 30 days. Please indicate successes or challenges associated with meeting this target and strategies being developed to improve or continue in this performance outcome. *(Please provide numerical data on this measure for the status report the average length of time between intake and housing placements for the RRH referrals received during the current quarter and cumulative total for the grant period.*
3. **ALL PROJECTS- Recidivism** - Indicate what percentages of participants exiting this quarter that were paying 50% of their income towards their rent at the time of exit, under 50% of their income, and over 50% of their income:

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

Please provide the number of transfer requests this quarter:

Please provide the number of transfer request granted this quarter:

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

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

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

Date received by SHNI _____

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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 or authorized signatory 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 System 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 System 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 System 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

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- 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 **System** and will ensure that each such person sign a **System** User Agreement. The Agency shall inform the **System** Administrator in writing within one business day of changes in the Agency's authorization of **System** 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 **System** 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 the **System** for a period of three years.

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14. Services shall be provided to Participants regardless of the System participation provided that 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 System. 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 System database and will strive for real-time, or close to real-time¹ data entry.
- C. The Agency **will not** alter information in the System 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 System.
- E. The Agency shall utilize the System 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 System.
- 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**. This 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 System 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.

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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 **System** 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 **System** within any other Agency, business or individual.
- B. The Agency **shall not** cause in any manner, or way, corruption of the **System**.

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 **System**: 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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**Signature of
Executive Director or Authorized Signatory**

Date

Agency Name / Title

FEIN

Street Address

City/State/Zip Code

Mailing Address (*Leave blank if same as above*)

City/State/Zip Code

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PARTICIPANT INFORMED CONSENT & RELEASE OF INFORMATION AUTHORIZATION

_____ is a Participating Agency in the Stark County Homeless Management Information System (HMIS) and Coordinated Entry System (CES) (hereinafter referred to as “the System”). The System is a shared homeless and housing database system administered by the Homeless Continuum of Care of Stark County (HCCSC) and the **current** Participating Agencies listed in Attachment A.

The Stark County System seeks to improve services and programs for homeless and low-income households by allowing authorized staff at Participating Agencies to share Participant information and to follow trends and service patterns over time. The Stark County System implements numerous privacy and security measures to ensure the confidentiality of your personal information.

Participation in the Stark County System is important to our community’s ability to provide you with the best services and housing possible and to better understand the local needs. As you receive services, information will be collected about you, the services provided to you, and the outcomes these services help you to achieve. Authorizing your information to be entered into the System and shared with Participating Agencies is voluntary. Refusing to do so will not limit your access to shelter or services.

I, _____, give authorization for the information described herein to be *entered* and *shared* between Participating Agencies for the purposes of assisting me in obtaining shelter/housing, employment, financial assistance, vocational services, counseling and/or medical/mental health treatment and for other uses specified in the **HCCSC System Privacy** Notice and any additional privacy notice that may be provided to me by the Agency. Such information may include, but is not limited to: intake date, name, gender, birth date, ethnicity, marital status, number in household, military status, homeless status, disability information, HIV-AIDS status, mental health service information, substance abuse service information, primary language spoken, and non- confidential services requested and received. I understand that I have the right to receive a copy of my HMIS information upon written request.

I understand that information disclosed pursuant to this authorization may only be disclosed as stated in the **HCCSC System Privacy** Notice and any other privacy notice that may be provided to me by the Agency.

I understand that the current list of Participating Agencies may change over time to include other agencies that provide housing or services to the homeless population, and I give authorization for my information to be shared with any new Participating Agency. _____(Please Initial)

I understand that I may request a current list of all Participating Agencies at any time. I understand that I may revoke this authorization at any time by written request but that the revocation will not apply to information previously used or disclosed prior to the effective date of such revocation.

Print Name of Participant

Date of Birth

Date

Print Name of Guardian (if required)

Date

Signature of Participant or Guardian

Date

Attachment A

Alliance for Children and Families

Coleman Professional Services

CommQuest EDEN. Inc.

Homeless Navigation Hotline (StarkMHAR)

ICAN Housing

Refuge of Hope

YWCA Canton

Stark Housing Network, Inc.

Stark Metropolitan Housing Authority

Family and Community Services

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HOMELESS CONTINUUM OF CARE OF STARK COUNTY SYSTEM PRIVACY NOTICE

_____ is a Participating Agency in the Stark County Homeless Management Information System (HMIS) and the Coordinated Entry System (CES) hereinafter referred to as “the System”. The System is a shared homeless and housing database administered by the Homeless Continuum of Care of Stark County (HCCSC) and the **current** Participating Agencies listed in Attachment A of policy E.3 Participant Informed Consent and Release of Information Authorization.

The Stark County System seeks to improve services and programs for homeless and low-income households by allowing authorized staff at Participating Agencies to share participant information and to follow trends and service patterns over time. The Stark County System implements numerous privacy and security measures to ensure the confidentiality of your personal information.

Participation in the Stark County System is important to our community’s ability to provide you with the best services and housing possible and to better understand the local needs. As you receive services, information will be collected about you, the services provided to you, and the outcomes these services help you to achieve. Authorizing your information to be entered into the System and shared with Participating Agencies is voluntary. Refusing to do so will not limit your access to shelter or services.

A. About this Notice

1. This Notice describes the collection, use, disclosure and maintenance of Protected Personal Information for Participants of the Stark County System whose information has been recorded in the Stark County System. It also describes the rights Participants have regarding that information.
2. Protected Personal Information (“PPI”) is any personal information (PI) maintained about a Participant that:
 - i. allows identification of an individual directly or indirectly;
 - ii. can be manipulated by a reasonably foreseeable method to identify a specific individual; **or**
 - iii. can be linked with other available information to identify a specific Participant.
3. This Notice may be amended and policies or practices changed at any time. Amendments may affect PI obtained before the effective date of the amendment.

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4. A written copy of this Notice will be provided to any individual who asks.

B. Purposes and Procedure for Collecting Personal Information

1. Only lawful and fair means will be used to collect PI.
2. PI may be collected for any one or combination of these purposes:
 - a. to provide or coordinate services to Participants
 - b. to locate other programs that may be able to assist Participants
 - c. for functions related to payment or reimbursement from others for services provided
 - d. to operate the System, including administrative functions such as legal, audits, personnel, oversight, and management functions
 - e. for another specific purpose of the System and/or a Participating Agency that is consistent with the intent and purpose of the HMIS policies
 - f. to comply with government reporting obligations
 - g. when required by law
3. PI is normally collected with the knowledge or consent of the Participant. If a Participant seeks assistance and provides PI, it is assumed that the Participant consents to the collection of information as described in this notice.
4. Information about a Participant may also be obtained from:
 - a. Individuals who are with the Participant
 - b. Other social services organizations that the Participant has accessed
 - c. Government agencies
 - d. Public records

C. Use and Disclosure of Personal Information

1. Participants' PI may be used or disclosed by the System and/or Participating Agencies only for the purposes listed below:
 - a. to provide or coordinate services to individuals
 - b. for functions related to payment or reimbursement for services
 - c. to carry out administrative functions such as legal, audits, personnel, oversight, and management functions
 - d. to create de-identified (anonymous) information that can be used for research and statistical purposes
 - e. when required by law to the extent that use or disclosure complies with and is limited to the requirements of the law
 - f. to avert a serious threat to health or safety, under certain conditions
 - g. to report about an individual that the Participating Agency reasonably believes to

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be a victim of abuse, neglect or domestic violence under certain conditions

D. Purposes and Procedure for Collecting Personal Information

5. Only lawful and fair means will be used to collect PI.
6. PI may be collected for any one or combination of these purposes:
 - a. to provide or coordinate services to Participants
 - b. to locate other programs that may be able to assist Participants
 - c. for functions related to payment or reimbursement from others for services provided
 - d. to operate the System, including administrative functions such as legal, audits, personnel, oversight, and management functions
 - e. for another specific purpose of the System and/or a Participating Agency that is consistent with the intent and purpose of the HMIS policies
 - f. to comply with government reporting obligations
 - g. when required by law
7. PI is normally collected with the knowledge or consent of the Participant. If a Participant seeks assistance and provides PI, it is assumed that the Participant consents to the collection of information as described in this notice.
8. Information about a Participant may also be obtained from:
 - a. Individuals who are with the Participant
 - b. Other social services organizations that the Participant has accessed
 - c. Government agencies
 - d. Public records

E. Use and Disclosure of Personal Information

2. Participants' PI may be used or disclosed by the System and/or Participating Agencies only for the purposes listed below:
 - a. to provide or coordinate services to individuals
 - b. for functions related to payment or reimbursement for services
 - c. to carry out administrative functions such as legal, audits, personnel, oversight, and management functions
 - d. to create de-identified (anonymous) information that can be used for research and statistical purposes
 - e. when required by law to the extent that use or disclosure complies with and is limited to the requirements of the law
 - f. to avert a serious threat to health or safety, under certain conditions
 - g. to report about an individual that the Participating Agency reasonably believes to be a victim of abuse, neglect or domestic violence under certain conditions

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- h. for academic research purposes under certain conditions
 - i. to a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) under certain conditions
 - j. to comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.
3. All other uses and disclosures of a Participant's PI will only be made with the Participant's written authorization, which the Participant may revoke in writing at any time.

F. **Inspection and Correction of Personal Information**

1. In order to inspect, obtain a copy of, or ask for correction of their PI, Participants should contact the HMIS Privacy Officer in writing at: HMIS Privacy Officer, 121 Cleveland Avenue SW, Canton, OH 44702.
2. Participants may inspect and have a copy of their PI maintained by the Stark County System. An explanation will be offered regarding any information that Participants may not understand.
3. Any request(s) will be considered from Participants for correction of inaccurate or incomplete PI maintained about them. If the Stark County System agrees that the information is inaccurate or incomplete, the information may be deleted or marked as inaccurate or incomplete and to be supplemented with additional information.
4. Participant request(s) for inspection or copying of PI may be denied under any one or combination of the following circumstances:
 - a. the information was compiled in reasonable anticipation of litigation or comparable proceedings,
 - b. the information is about another individual,
 - c. the information was obtained under a promise of confidentiality and if the disclosure would reveal the source of the information, **or**
 - d. disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.
5. If a request for access or correction is denied, the reason for the denial will be explained. Documentation of the request and the reason for the denial will be included as part of the PI maintained.
6. Repeated or harassing requests for access or correction may be rejected.

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G. Complaints

All complaints about Stark County System privacy and security policies and practices or the implementation of those policies and practices may be submitted to the HCCSC and/or the Participating Agency named above.