The Balance of Washington State Continuum of Care Policies and Procedures/Governance Charter

The Balance of Washington State Continuum of Care

Policies and Procedures/Governance Charter

REV: March 2019

1. Overview and Purpose

The Balance of Washington State Continuum of Care (CoC) is organized to provide leadership and coordination in activities throughout its 34-county jurisdiction toward the goal of ending homelessness and working to prevent the occurrence of homelessness within the area. The CoC commits to work toward the specific goals of the United States Interagency Council on Homelessness' *Home, Together* plan*,* aimed at ending homelessness for major subpopulations of Veterans, Chronic Homeless persons, homeless youth and families with children. The CoC endorsed the goals of *Home, Together* and is responsible for providing leadership among stakeholders and stakeholder organizations operating in the CoC. As the CoC covers 34 of the 39 counties of the State, it also recognizes the unique role it plays in serving as a key sounding board and advisor to the State's primary housing and homeless services entity - the Washington State Department of Commerce.

The Continuum is led by the Balance of Washington State Continuum Steering Committee (Steering Committee), a body of stakeholders at all levels of government, representatives of non-profit organizations throughout the diverse geographical area, advocacy groups, regional and county homeless planning organizations and housing and service providers. The Steering Committee also serves as an advisor to the Washington State Department of Commerce on policies, issues and opportunities affecting homelessness within the 34-county jurisdiction.

2. BoS CoC and Local Continuum Responsibilities

Balance of State CoC-level Responsibilities
- Provide support and leadership at the 34-county Balance of State level, including decision-making on project funding, development of Balance of State-wide strategies to end homelessness, coordination of the Annual Point in Time Count, managing the HMIS data base and providing technical assistance to McKinney-Vento and ESG grantees.
- Provide the framework for a comprehensive, coordinated, and clear planning process to encourage strong Local County processes (including but not limited to the Point in Time Count (PIT) and the Housing Inventory Count (HIC)) involved in planning, implementing and coordinating the delivery of homeless outreach, services and housing.
- Measure the CoC's effectiveness in reducing homelessness at both a system and project level. Indicators for projects will at least be the standard HUD measures of housing stability, employment and use of mainstream resources. System-wide indicators will include the reduction of recidivism, fewer homeless families, and shortening length of homelessness.

- Periodically review and modify as needed its strategic approach to ending homelessness.
- Strengthen coordination between CoC-funded activities and other HUD-funded activities directed at ending homelessness, such as activities funded through the Emergency Solutions Grant (ESG) program.

Local Continuum[1] Responsibilities
- Meet periodically to plan and coordinate specific steps to reduce homelessness in the local continuum
- Support the coordination of outreach and entry systems
- Advocate, when allowed, for local and state resources to support strategies to end homelessness
- Coordinate the local Point In Time Count within the local continuum to assure accuracy and maximize coverage
- Inform the Balance of State CoC of local financial and program needs
- Provide information on priorities for Homeless Assistance Grants (HAG) when two or more projects are applying for HAG Bonus Funds
- Send representatives to the Balance of State CoC meetings, including the Steering Committee and the Subpopulation Committees

The following specific responsibilities of the BoS CoC and Local Continuums accomplish these goals:

A. Conduct effective planning processes to develop and update a Plan to End Homelessness (Plan)

The CoC coordinates and implements a comprehensive system to address the needs of the homeless population, subpopulations and persons experiencing a housing crisis within its geographic area. The CoC develops long-range strategies and action steps to implement the Plan, periodically evaluating and updating the Plan to ensure its effectiveness.
The Continuum coordinates the following components of the system:
- Outreach, engagement and assessment
- Shelter, housing, and supportive services
- Homelessness prevention strategies

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[1] Local Continuum refers to a county's homeless planning body. This body helps coordinate homeless services in the region and elects BoS CoC Steering Committee voting representative(s). In some cases, this local planning body may include more than one county.

B. Coordinate with other entities and organizations in improving the effectiveness of homeless assistance

The CoC cannot end homelessness and prevent future homelessness without the involvement of human and financial resources from other organizations at state and local levels working toward those goals. Therefore, close coordination with statewide and local organizations is essential while planning and implementing homeless programs and activities in the 34-county area. The CoC's primary relationships are with the Local Continuums of Care and the Collaborative Applicant, the Washington State Department of Commerce, which has responsibilities to the State Legislature for planning and implementing programs statewide. The CoC is primarily responsible for coordinating with key entities involved in programs aimed at meeting the needs of homeless persons and other at-risk populations. Included is coordination with the five other CoCs operating in the State, statewide advocacy groups and representatives operating various stakeholders throughout our communities.

Given that funding under the Continuum of Care Program is not sufficient to support a comprehensive system for addressing homelessness, additional funding from dedicated homeless programs, including ESG, state-funded homeless programs and mainstream resources is needed to carry out the CoC's homelessness activities. Coordination of these funding streams and related services leads to a stronger community response to homelessness at both the Balance of State level and the Local Continuum level.

The Department of Commerce not only manages homeless and housing programs for the state but is also responsible for updating and implementing a statewide Five Year Plan to End Homelessness. The CoC maintains close coordination with the Homeless Advisory Committee (HAC) to help assure a coordinated approach to ending homelessness in the state.

Coordination of homeless planning and implementation with the following organizations at the local and state levels is necessary:
- State and Regional Behavioral Health and Managed Care Organizations,
- State and Regional Accountable Communities of Health,
- Washington State Department of Health and Social Services (DSHS),
- Washington State Department of Corrections (DOC),
- Washington Department of Veterans Affairs (WDVA),
- Office of Homeless Youth (OHY)
- Office of Family and Adult Homelessness (OFAH) and
- The Office of the Superintendent of Public Instruction (OSPI), including coordination with the statewide Homeless Liaison.

Encourage increased coordination among federal homeless programs through improved consultation with recipients and sub-recipients of the Emergency Solutions Grant Program.

The CoC coordinates with ESG recipients, sub-recipients, city and county governments, CAP agencies, nonprofit agencies, the Department of Commerce, other state agencies and other service

providers on the allocation of resources within the CoC and the coordinated entry and assessment system. The CoC consults with ESG recipients and sub-recipients within the CoC and in neighboring CoCs with respect to the plan for allocating ESG funding, and reporting/evaluating the performance of ESG sub-recipients within the CoC's geographic area.

The CoC requires the continued use of the HMIS and central Contract Management System by state ESG recipients, and the Department of Commerce to review the performance of ESG projects within the CoC. Department of Commerce performance monitoring includes analyses and monitoring of data quality and completeness, persons served, total exits to permanent housing, program outcomes for specific subpopulations, length of time homeless, returns to homelessness after exits to stable housing and other performance measures. The Department of Commerce reviews performance reports with the Steering Committee to inform decisions regarding technical assistance, policy and resource allocation.

Encourage increased coordination with CDBG and Consolidated Planning Processes

The CoC is responsible for coordinating with local entities operating CDBG Programs and the Consolidated (Housing and Community Development) Planning processes within its 34-county jurisdiction. This is accomplished through the annual Consolidated Planning process conducted by the Department of Commerce within counties and cities that do not receive direct CDBG or HOME funding. Local Continuums are responsible for coordinating homeless activities and participating in the consolidated planning process of local governmental entities receiving annual HUD community development and housing grants. (See Appendix for a listing of cities and counties with Consolidated Planning responsibilities and HUD community development and housing grants.)

Representatives of the Steering Committee serve on multiple statewide Boards and Organizations, including the Interagency Council on Homelessness (ICH), the Homeless Advisory Committee and Public Policy Committee of the Washington Low Income Housing Alliance (WLIHA), the Washington State Association of Housing Authorities, the Governor's State Advisory Council on Homelessness (SACH) and the Governor's Affordable Housing Advisory Board (AHAB). Their participation increases coordination amongst these programs.

C. Ensure an effective performance management system through HMIS to ensure progress in meeting established project and CoC outcomes

The CoC is accountable to HUD and the community for the Homeless Management Information System (HMIS) and therefore maintains a strong relationship with the Department of Commerce, which is responsible for implementing the HMIS system for the State. The CoC coordinates with the Department of Commerce to establish performance targets appropriate for population and program type in consultation with recipients and sub-recipients. The CoC also reviews periodic reports on performance of Continuum of Care-wide goals and supports the Department of Commerce's efforts to obtain accurate and complete data on tracked outcomes. The CoC is responsible for the following HMIS functions:

- Designating a single HMIS for its geographic area.

- Designating a single eligible applicant to serve as the HMIS lead to manage the HMIS.
- Ensuring that the HMIS is administered in compliance with requirements prescribed by HUD.
- Reviewing, revising, and approving an HMIS privacy plan, security plan and data quality plan.
- Ensuring the consistent participation of recipients and sub-recipients in the HMIS.
- Establishing performance measures for analysis of project type and specific performance for individual projects
- Monitor and report on CoC and statewide measures including returns to homelessness, length of time homeless, new homeless and exits to permanent housing
- Identify providers for monitoring and Technical Assistance for HMIS data quality and program performance based on HMIS data
- Increase HMIS bed coverage by providers in the CoC

D. Technical Assistance, Monitoring Project Performance and Grant Compliance

Maintain an effective HUD McKinney-Vento project monitoring and technical assistance effort to assist grantees with weak performance or management issues

The CoC monitors recipient and sub-recipient performance, evaluates project outcomes, and provides technical assistance within the CoC's capacity to weak/poor performers. The CoC manages McKinney-Vento resources to assure maximum impact of funds on improving outcomes; and reallocates funds as necessary. In order to facilitate this technical assistance, all McKinney-Vento recipients and sub-recipients are required to forward all correspondence to and from HUD on HUD monitoring letters to the CoC's staff (matt.mazur-hart@commerce.wa.gov).

Conduct Performance Monitoring to Improve Outcomes

Each December, the CoC reviews project and Local Continuum-wide performance outcomes and prepares "State of the Balance of State" report, which includes McKinney and non-McKinney analysis. The report is provided to the Steering Committee for consideration of actions in the coming year.

CoC staff, with the help of the Commerce Performance Specialist, reviews and reports on McKinney-Vento project-specific progress/performance and Local Continuum-wide outcomes quarterly and annually. The report is presented to the Planning Committee and summarized for the Steering Committee.

Among the Outcomes included in the Review/Report:

- Continuum-wide Point in Time Count for populations/subpopulations as well as sheltered/unsheltered homeless (for Annual Spring Report only);
- Continuum-wide Housing Inventory Chart (HIC) Resources (McKinney/non-McKinney) (for Annual Spring Report only);

- Chronic Homeless beds in Continuum inventory;
- Length of stay;
- Length of time homeless;
- Returns to homelessness;
- Housing Stability Permanent Supportive Housing;
- Exits from Transitional Housing to permanent housing destination;
- Earned Income and Earned Income Increases;
- Other Income and Other Income Increases;
- Non-cash Mainstream Services provided;
- Funds Returned or not Utilized;
- Utilization;
- Fund Usage.

Monitoring of Grantees

The CoC will monitor Grantees for compliance and performance for the following:

APR Timely submission:
- The Department of Commerce will send a notice to grantees of APR due dates 90 days before they are due, followed by a 30 day notice. Commerce staff will monitor compliance on due dates and provide TA as needed to complete the APRs.

LOCCS Drawdown compliance:
- Grantees are required to draw down funds on a quarterly basis. Drawdowns and Fund Usage will be monitored and TA provided as necessary.

High Funds Return Rates:
- Grantees will be monitored on a quarterly basis for the potential of recapture of funds. Grantees with large and frequent recaptures will be subject to loss of funding at renewal decisions.

Grantee Performance:
- Grantees will be monitored annually on project performance measures including at least the following: Housing Stability, Employment Income, Other Income, Increased Employment Income, Increased Other Income, Non-Cash Resources, Fund Utilization, Recaptures, Hard to Serve Populations and other measures that may be added. These are used in the rating and ranking of the project during the annual funds competitions.

Grantees may request Technical Assistance on areas of compliance. CoC staff, with the help of the Commerce Performance Specialist, will provide TA to the extent feasible.

E. Maximize resources by annually preparing competitive applications for the HUD McKinney-Vento Programs and other CoC funding opportunities as they arise

Annually, the CoC develops a strong McKinney-Vento application and aggressively seeks resources from other funding opportunities as appropriate, such as the Youth Homelessness Demonstration Program. The CoC adequately manages the McKinney-Vento funds, conducts activities that achieve CoC outcomes and goals, and maximizes the use of the funds. The CoC establishes priorities for funding projects in its geographic area. The selection process is transparent, inclusive, and based on the standards indicated in 24 CFR part 578.19(b).

The CoC follows a collaborative process for developing applications and approving the submission of applications in response to a NOFA published by HUD; in concert with the funding priorities and plan adopted by the CoC. In the process, the CoC ensures that eligible applicants submit all project applications.

Coordinate with the Continuum of Care's Collaborative Applicant for The HUD McKinney-Vento Homeless Assistance Grants

The CoC works closely with the WA Department of Commerce, which is the designated Collaborative Applicant. A close working relationship between the two entities is essential for the effective management of the HUD McKinney-Vento resources and ensures the CoC is competitive in the national HUD homeless programs application processes.

The Collaborative Applicant is the entity that submits the annual HUD McKinney-Vento Consolidated Application for project funding on behalf of the CoC. The CoC retains all of its responsibilities to determine which applications are to be included in the annual request to HUD.

Conduct an Annual McKinney-Vento Funding Competition

The CoC follows principles of fairness and openness when inviting new proposals from previously unfunded counties and non-profit/governmental agencies. It is the policy of the CoC to provide a preference to unfunded counties (for both Technical Assistance and extra points in the project rating criteria).

The CoC forms a Rating and Ranking Committee, which annually determines the 'Rating and Ranking Criteria' in response to the HUD Notice of Funding Availability (NOFA). Generally, rating criteria for renewals will be performance-based using HMIS and APR outcomes, while new projects will be based upon capacity, impact of the project, likelihood of success and relationship of the project to the priorities identified in the NOFA.

The Department of Commerce staff assigned to the CoC will monitor the potential for appearance of a conflict or an actual conflict of interest. The procedures found in Section 2.J. of this document will prevail.

At least 15 days prior to the deadline for submission of the HUD application, all rejected applicants and/or those who would otherwise not be sent to HUD with the CoC's application will be provided written notice of the results and the reason for the decision. Rejected applicants will be provided an opportunity to appeal the results prior to submission of the CoC's application. A written response to the appeal will be provided within 5 days.

The Final Project Listing, along with the CoC's Consolidated Application and attachments, will be posted on the CoC website. The full membership, stakeholders and interested parties will receive an e-mail communicating the results of the Project Listing. Results will include the projects rejected and accepted and where on the CoC's website the information is located. The goal is to e-mail and post the results at least 2 days prior to the submission of the CoC's application to HUD.

Application Standards and Thresholds

The CoC will annually update the requirements for application. An example of the standards and thresholds applied is the following included in the 2016 RFP for Renewal Applicants.

Threshold Criteria

All Applications must meet the following threshold requirements:

1. A completed application is submitted by the deadline.
2. The applicant's organization has adequate capacity to successfully manage McKinney-Vento funds, including consideration of their ability to manage existing McKinney-Vento grants.
3. The applicant meets the HUD eligibility requirements and thresholds.
4. The proposed activities meet McKinney-Vento eligibility requirements.
5. The grant request is reasonable based upon the proposed scope.
6. A review of their latest Independent Audit reveals no major findings unaddressed (Evidence of agency's adequate capacity determined by the applicant's response to the Audit findings) and the receipt of the summary pages of the applicant's most recent Audit.
7. For applicants with current HUD McKinney-Vento grants, the latest HUD Monitoring letter reveals no major findings unaddressed (Applicants who currently have HUD McKinney grants must also include the latest HUD monitoring letter and, if appropriate, evidence of actions to clear findings or evidence findings have been cleared by HUD).
8. The application is likely to improve the Continuum's outcome performance and will contribute to reducing homelessness.
9. The project meets HUD's specific threshold requirements per the annual NOFA. See Section V.G.2 of the 2016 Program NOFA.
10. The Continuum receives a Local Continuum response and a grantee response to the Continuum's request for *"Supplemental Information to Support the Balance of State CoC Application"*.
11. To demonstrate organizational capacity, the most recently reported performance scores for a given grant equal at least the average of all project performance scores.
12. Projects serving persons with disabilities provide a brief statement on how they will ensure that persons with disabilities can interact with other persons without disabilities.

13. Applicants demonstrate that their project will help improve the Local Continuum operating system.
14. Applicants must demonstrate that their project supports at least one of the four HUD Policy Priorities listed in number 6 below.

Supplemental Application Rating and Threshold Requirements:

Following are examples of the required documents for a Preliminary Application for Renewal Funds for 2016 and may be updated as necessary on an annual basis:

1. Submit the Summary Pages of the most recently completed Independent Audit Letter showing significant findings and issues and, as appropriate, evidence of adequate responses to findings and issues identified.
2. Submit a copy of the latest HUD monitoring letter and, if appropriate, evidence of actions to clear findings (or evidence HUD has cleared the findings).
3. Projects serving chronic homeless persons and persons with disabilities must provide a brief statement on how they will ensure that persons with disabilities are given opportunities to interact with other persons without disabilities.
4. To assess the grantee's compliance with HUD LOCCS Drawdown requirements, submit a list of the date of all LOCCS drawdowns made since August 1, 2015.
5. Provide a brief statement on how your renewal project supports and improves the local Continuum's operating system.
6. Indicate in a brief statement the extent to which your project supports the current HUD Policy Priorities, including the following 2016 HUD priorities:
   o End Family, Chronic, Veterans and Youth homelessness – Projects target one or more of these HUD priority populations;
   o Integration – Programs which ensure that participants with disabilities can interact with persons without disabilities to the extent feasible;
   o Improve Outreach – Effectively engage persons in sheltered and unsheltered conditions and provide meaningful access to services and programs, including persons with limited English proficiency (LED);
   o Adopt client-centered service methods – Programs are tailored to the needs of participants to meet their unique needs.

F. Operate an Effective Coordinated Intake and Assessment System

In collaboration with the recipients of Emergency Solutions Grants program funds, other federal funds, state funds and local funds, the CoC operates a coordinated entry and assessment system that provides an initial, comprehensive assessment of the housing and service needs of individuals and families within the CoC and prioritizes households for housing programs based on need.

The CoC has adopted written coordinated entry policies and procedures, titled Washington State Coordinated Entry Guidelines, that align with HUD's new CE requirements (HUD Notice CPD-17-01). The policies and procedures allow for local options, and therefore each Local Continuum within the

BoS CoC must develop their own CE policies and procedures based on the local needs of their continuum, within the framework of the CE guidelines.

G. Establish and Monitor Prioritization and Targeting Policies

It is the CoC's policy to prioritize resources to serve the most vulnerable populations of homeless persons to prevent their continued homelessness on the streets and in areas not meant for human habitation. The CoC's policy is to administer programs and projects within its jurisdiction to reduce barriers to housing, following the principles of Housing First.

Policies:

- The CoC will focus on resources that will assist in ending homelessness for specific target populations discussed at the beginning of this document.
- The CoC encourages commitments by project sponsors to dedicate Permanent Supportive Housing beds for chronic homeless persons and, where the beds remain undedicated for chronic homeless persons, to maximize the number that will be prioritized at turnover to chronic homeless persons.
- The CoC encourages the prioritization of beds for homeless Veterans to the extent feasible.

Prioritization based on Vulnerability

The Continuum adopts the provisions of HUD CPD Notice 16-11**,** which establishes priorities for housing based on factors of need/vulnerability rather than time of application. McKinney-Vento projects will comply with these prioritization procedures including record keeping and reporting. The responsibilities for carrying out these provisions rest primarily with the McKinney-Vento grantee but also with the Coordinated Entry System at the local level. Coordination and cooperation are critical in assuring the provisions are effective. The specific provisions of this prioritization process are detailed in the CPD Notice.

H. Conduct an annual assessment of needs and resources through the Point in Time Count (PIT) and Housing Inventory Count (HIC)

Annually, the CoC assesses the needs of homeless persons in the CoC through a well-coordinated point in time count, an on-going review of trends through analysis of HMIS data, and an identification of homeless needs and housing/services resources available within the CoC. The CoC looks for gaps to determine the unmet needs of the CoC.

The PIT Count of homeless persons within the CoC enumerates the following:
1) the number of homeless persons who are living in places not designed for or ordinarily used as regular sleeping accommodations for humans (unsheltered homeless persons);
2) the number of homeless persons living in emergency shelters and transitional housing projects (sheltered homeless persons); and
3) other annual count requirements established by HUD by Notices.

The HIC of available beds dedicated to the homeless population enumerates the number of beds dedicated to serve homeless persons in all available project types including emergency shelters, transitional housing, rapid re-housing, permanent supportive housing, other permanent housing, or safe havens.

I. Conflict of Interest

In the administration of duties and responsibilities involving the HUD McKinney-Vento programs, it is critical that those duties be carried out in a fair and open manner without conflicts of interest. The CoC adheres to Federal regulations, 24 CFR 578.95, which outline the requirements related to Balance of Washington State Continuum sub-recipients, the CoC leadership and others involved in the execution of the responsibilities of the CoC. Conflicts and the appearance of conflicts are to be avoided.

Persons serving on the Steering Committee or its subcommittees, in particular, must avoid conflicts of interest or the appearance of conflicts. In cases of question, they may 1) request an opinion or a decision of whether a conflict or the appearance of a conflict is present 2) recuse themselves from the portion of their duties which presents the potential conflict or 3) request an exception to the conflict of interest provisions. In questions of conflicts of interest, they must either bring it to the attention of the designated staff person of the Collaborative Applicant, or the Chair(s) of the CoC.

In the case of the Rating and Ranking Committee(s) of the CoC, members must make the Committee Chair or Committee Staff Coordinator aware of a conflict or appearance of conflict and recuse themselves from decisions affecting specific local continuums, grantees, known sub-recipients, and applicants if a Committee member:
1) has been an active member of a Local Continuum (during the previous 3 years) from which an application has been submitted, or
2) has been an employee of an applicant organization within the past 5 years, or
3) has a relative who is a current employee of an applicant organization, or
4) Has a financial interest in (or business relationship with) the applicant organization.

In such cases, the Committee member must notify the Chair or the Committee Staff Coordinator of the conflict or appearance of a conflict and shall refrain from participating in or voting for or against the specific organization or application unless an exception is granted.

In cases of any question of applicability, the Committee member will reveal the potential conflict to the Chair or the Committee Staff Coordinator.

J. Provide information needed for Consolidated Plan(s) within the Continuum's geographic area

The CoC coordinates with local jurisdictions through the Department of Commerce framework to supply information needed for Consolidated Plans at the local level and the Balance of State level. Local Continuums will provide information as needed for Consolidated Plans in their geographic

area. This includes providing information on the most recent Point in Time Count (PIT), the Homeless Housing Inventory Chart (HIC), and the strategies and goals of the Continuum of Care.

It is the responsibility of each Local Continuum to participate in the annual consolidated planning process of jurisdictions with HUD (CDBG, HOME, and HOPWA) grants. This may be accomplished by formally sending representatives to the planning meetings/hearings or by ad hoc participation with reports back to the Local Continuums. In addition, all counties should participate in the State Consolidated Planning process. The Department of Commerce specifically encourages the participation of counties that do not have a local Consolidated Plan. For a complete list of jurisdictions receiving HUD grants see the NOFA Recipients list in the appendix.

K. Develop and Follow Policies and Procedures

In consultation with the Collaborative Applicant and the HMIS lead, the CoC will develop, follow, and update annually a governance charter that includes all procedures and policies needed to comply with 24 CFR 578.5(b) and with HMIS requirements as prescribed by HUD.

On an annual basis, the Policies and Procedures will be reviewed and updated as necessary by the CoC using the following process:

By December 1 of the year, CoC staff and members of the CoC will provide a "State of the State" Report, which includes an evaluation of the performance and operative functions of the CoC. With the consultation of the Steering Committee Chair(s) or a Committee assigned by the Chair(s) a set of recommendations will be presented to the Steering Committee. These recommendations will be for updating the Policies and Procedures to reflect changing needs and actions to further adopted goals. By a vote of the majority of the Steering Committee, proposed modifications will be published, amended or rejected and sent to the full CoC membership for comment.

The CoC has established and consistently follows written standards for providing assistance through CoC resources. In the course of administering assistance, the CoC consults with the recipients of Emergency Solutions Grants program funds. The CoC operates in accordance with the following policies, procedures and standards, which are outlined in the Appendix:

- Code of Conduct, Conflict of Interest and Recusal Process Policy (see #3, page 3)
- HMIS Operating Procedures
- Technical Assistance to Grantees and Sub-recipients

Major plans of the CoC, amendments to plans and the annual HUD application submitted by the CoC are made available on the CoC website and/or through electronic distribution.

L. Maintain an active CoC organizational structure & conduct regular meetings in an open process

Steering Committee Meetings – Due to the large geographical area covered by the CoC, it is not feasible to hold every Steering Committee and full membership meeting in person. The Steering

Committee will convene a minimum of nine meetings a year, generally on a monthly basis. The public is invited to join and participate in the meetings. Because of the large CoC geography and travel costs, these meetings will generally be held by webinar. In-person meetings should be held in centrally located venues or at times when most of the members may be attending a meeting or conference. At least one in-person meeting will be held in Eastern Washington per year. Agendas will be developed by the Planning Committee and will be sent to the Steering Committee in advance of meetings. Minutes are taken and major decisions are communicated to the Full Membership of the CoC, including Local Continuums and HAG recipients/subrecipients as appropriate.

BoS CoC Meeting notes will include:

- Verbatim Transcripts of Formal Motions

- Full Names of Meeting Participants

- Specific Action Assignments

- Formal Decisions, Resolutions and Outcomes

- Next meeting Date and Time

BoS CoC Meeting Notes will **NOT** Include:

- Who Moved and Seconded a Formal Motion

- Discussion – He said/She Said

- Presentations and data specifics (support materials like PowerPoint or attachments can be linked)

- Opinion/Biased Information

These meetings are open to the public and are announced at least two weeks in advance by an e-mail to the full membership and placed on the CoC website. Agendas of the meeting are published with the meeting announcement. The purpose of the meetings include providing updates on: progress in meeting plan strategies and evaluating performance, training, disseminating information, obtaining comments on issues and directions and/or planning.

Other Committee Meetings - Standing Committees and Ad Hoc Committees will meet according to the schedule below to fulfill their tasks. The Chair(s) will set the meeting times and venue. Reports of Committee work will be made to the Steering Committee as needed. The CoC has established the following Standing Committees, the roles and responsibilities of which are further described in the Section 3: Organization Framework:

- **Planning** (Monthly or more often)
- **Families with Children** (At least Quarterly)
- **Veterans** (At least Quarterly)
- **Singles/Chronic Homeless** (At least Quarterly)
- **Youth** (At least Quarterly)
- **Racial Equity** (At least Quarterly)

- **Rating and Ranking** (Annually during the Rating and Ranking Process)

In addition, the CoC annually conducts an effective PIT and HIC Count. Local Coordinators help guide the process and serves as a conduit for information to coordinate the process.

3. Organizational Framework

A. Steering Committee Composition

As described above, at the State level, the CoC consists of a Steering Committee (assisted by Commerce staff), Standing Committees and Ad Hoc Committees.

The Steering Committee coordinates and is linked with Continuum of Care planning groups at the local level (county or multi-county) through liaisons and communication networks. In addition, the Steering Committee is linked to the Collaborative Applicant for purposes of applying, receiving and managing McKinney-Vento Grant funds. Finally, the CoC coordinates periodically with the other five independent CoCs of the State. The specific responsibilities of these groups are further described in the Appendix and below.

The composition of the CoC is tailored to meet the unique characteristics of the 34-county jurisdiction. The Full CoC Membership consists of representatives of all entities (local, regional and statewide) operating in the Balance of State CoC jurisdiction who are included in the broad e-mail communication list maintained by Commerce staff. New organizations and individuals serving the homeless within the CoC jurisdiction are invited to join at any time during the year and can be included on the e-mail list of Full Members by contacting matt.mazur-hart@commerce.wa.gov. An open invitation will be permanently included on the CoC website and an invitation for new members will be sent out broadly in conjunction with the annual CoC NOFA.

The CoC collaborates with local planning organizations, state-level organizations and governmental agencies in carrying out its responsibilities. Planning and coordination take place at both the CoC-wide level and the local level (county or multi-county). Representatives of local non-profit organizations and advocacy groups, statewide agencies and local government are included among members of the CoC Steering Committee to ensure effective participation by all community stakeholders in developing and implementing a range of housing and services.

B. Geographic and Organizational Representation

The CoC geographic area includes all counties of the state with the exception of Clark, King, Pierce, Spokane, and Snohomish counties. The CoC coordinates with these other five independent CoCs through periodic meetings as needed.

The Steering Committee operates in accordance with the requirements in 24 CFR 578.7(a)(3).

The CoC is a representative organization with a diverse and comprehensive membership. It includes community stakeholders from geographic regions of the CoC, agency staff representing the major homeless populations and representatives of state agencies involved with homeless programs. The Steering Committee provides leadership in homeless planning for the geographical area of the CoC.

C. Voting Member Framework

The Voting Membership of the Steering Committee will consist of representatives from the counties within the BoS and officers of the CoC. Counties with a population of less than 100,000 based on the most recent OFM population estimate will have a single voting representative. Counties with a population of more than 100,000 based on the most recent estimate will have two voting representatives. Counties with a population greater than 100,000 include Benton, Thurston, Kitsap, Whatcom, Skagit, Yakima, and Cowlitz Counties. Chairs of standing subcommittees are voting members. Chairs of the Balance of State CoC Steering Committee are voting members. Quorum for the Steering Committee in person quarterly meetings will be 33%+1 of BoS counties' representatives (12). Voting members can fill multiple roles within the CoC, thus a county may designate a person who is also the Chair of a Subpopulation committee. Individual counties may designate the same person to represent both of their interests. However, one person will only be allowed one vote.

Local Continuums will determine who will represent them on the BoS Steering Committee. Local Continuums will determine the process, election and length of term of their representatives. Local Continuums can substitute a representative via written consent to the Planning Committee. In the event that a county does not have an active Local Continuum, the County Commissioners may designate the appropriate person or persons to the Steering Committee.

The Planning Committee seeks to have Ex Officio members of the Steering Committee to solicit input and expertise from stakeholders in the homeless services field. Possible Ex Officio members could represent:

- Non-profits
- Faith Based organizations,
- Homeless or formerly homeless persons
- Specialists regarding populations such as Families with Children, Youth, Chronic Homelessness, Veterans, Behavioral Health, HIV/AIDS, Domestic Violence Survivors, etc.

Program and grant operators of the following:

- ESG
- TANF
- HOME
- Headstart
- RHY

- SSVF
- Statewide Advisory Boards
- Major State Agencies

The Steering Committee generally meets monthly in either Webinars or the quarterly in-person meetings, which usually occur in conjunction with statewide meetings that bring stakeholders together like the Washington Low Income Housing Alliance's Conference on Ending Homelessness. The Steering Committee's practice is that meetings operate in an open, public manner, with agendas written and distributed prior to the meeting. Invitations to in-person and Webinar meetings of the Steering Committee are broadly distributed to assure as many interested parties as possible are given the opportunity to join and participate in the meetings. Steering Committee decisions on policy, direction, funding and other major actions must be proposed by formal motion, discussed openly and passed by a majority of voting members present if a quorum exists. Webinar electronic votes are by show of "hands" (identifying the specific registered individual) and recorded by staff attending the conference call. In-person votes are by show of hands, identifying the individual. If discussion of the matter and/or the vote reveals a large minority opinion, the Chair may extend discussion to provide further understanding of the issue. Minutes are prepared and distributed by e-mail to the same broad list used for invitation to the meeting; and are posted on the CoC website.

D. Representative Responsibilities

Voting Members should participate in Steering Committee meetings and be active participants in at least one subcommittee, either a standing subcommittee or an ad-hoc committee. The Chairs of the subcommittees will determine the terms of participation.

E. Officers

There will be a Chair(s) (or Co-Chairs of the Steering Committee at the discretion of the Steering Committee). To the extent feasible, co-chairs will be nominated from both eastern and western Washington. Other positions may be established at the discretion of the Steering Committee. Positions will be filled by a majority vote of the Steering Committee. Terms will be for a two-year period with the potential for succession by vote at the end of two years.

Members of the Steering Committee and its Officers as well as others acting on behalf of the Steering Committee must comply with the CoC's Code of Conduct, Conflict of Interest and Recusal Process found in the Appendix.

F. Sub-Committees

<u>Standing Committees</u> – Currently, Standing Committees include:

- **Planning** (Monthly or more often)

- **Subcommittees**
  - **Families with Children** (At least Quarterly)
  - **Veterans** (At least Quarterly)
  - **Families without Children/Chronic Homeless** (At least Quarterly)
  - **Youth** (At least Quarterly)
  - **Racial Equity** (At least Quarterly)
- **Rating and Ranking** (Annually during the Rating and Ranking Process)

Members of Standing Committees may volunteer or be solicited/appointed by the Steering Committee. They need not be members of the Steering Committee. The Chair(s) of Standing Committees will be chosen by the membership of each Standing Committee to serve two-year terms. Standing Committees are responsible for reporting to the Steering Committee at least quarterly on key issues and progress in their area of responsibility.

Planning Committee –
Composed of the Co-Chairs of the CoC, Chairs of the Subpopulation Committees and other members of the CoC at the discretion of Co-Chairs of the CoC. The Planning Committee will develop strategies to end homelessness, set agendas for Steering Committee meetings, inform the State Plan to End Homelessness (as set by the State and Commerce) and take other actions as deemed necessary by the Steering Committee. The Planning Committee reports to and is directed by the Steering Committee. In January of each year, the Planning Committee will establish an annual schedule of events, reporting timeframes and meetings to guide the CoC throughout the year.

Subcommittees–
Responsible for proposing strategies and actions to end homelessness within their designated focus area as related to the CoC adopted plan to end homelessness. Subcommittees are composed of stakeholders and experts within their subject area. These committees provide updates, recommendations and sponsor special initiatives and projects and report to the Steering and Planning Committees.

Rating and Ranking Committee(s) –
Responsible for rating and ranking of all annual McKinney-Vento Project applications going through the Balance of State Continuum of Care. There may be more than one Rating Committee if it is determined by the Steering Committee that it is in the best interests of the CoC to have separate criteria and rating processes for different types of applications (e.g. renewal and bonus applications). The Rating and Ranking Committee(s) may also rate and rank additional (non-McKinney-Vento) grants as necessary. The Rating and Ranking Committee(s) presents their proposed rating and rankings to the Steering Committee, which adopts, rejects or amends the proposal. Membership and participation in the Rating and Ranking Committee(s) is contingent upon a lack of conflict of interest related to the project applications.

Ad Hoc Committees –
From time to time, the Steering Committee or its Chair(s) will appoint Ad Hoc committees to carry out specific tasks. The Chair (or Co-Chairs) of Ad Hoc Committees will be chosen by the membership of each Ad Hoc Committee. The Steering Committee will determine necessary terms and scope of their initiatives. These Ad Hoc Committees are organized at the discretion of the Steering

Committee or the Chair(s). Ad Hoc Committees report to and are directed by the Steering Committee. An Ad Hoc committee can become a Standing committee at any time by majority vote of the Steering Committee.

4. Participation in CoC Activities

It is the policy of the CoC to operate in an open, informative process with decisions made during meetings open to the public. To the extent feasible, in-person CoC meetings are coordinated to coincide with statewide Commerce meetings with State Homeless Program and Emergency Solutions Grant grantees or conferences.

The CoC seeks broad participation in its activities. The CoC solicits new members through a notice on the website and e-mail communications with members, inviting new members/participants. The CoC recognizes the richness of participation from a breadth of persons representing the interests of each homeless subpopulation, organizations providing a variety of types of housing and services, funders, local and state government, the physical and behavioral health communities, law enforcement, homeless persons, advocates, elected officials and a variety of non-profit agencies engaged in homeless services or housing.

The CoC maintains a database tracking participation by representatives of subpopulations of homeless persons (including Runaway Homeless Youth grantees and providers of housing/services for persons fleeing domestic violence, for example). The Steering Committee leadership actively seeks to fill gaps in inclusiveness on the Steering Committee and its subcommittees.

5. New Policies – Adopted March 2019

Services for Survivors of Domestic Violence

CoC projects must develop an emergency transfer plan that applies to persons who are survivors of domestic violence, dating violence, sexual assault, or stalking. The emergency transfer plan must allow survivors to request a transfer from their current unit to a unit that is safer, provided that the housing provider has a unit(s) available. If the housing provider does not have a unit(s) available, it should work with other nearby housing providers to secure safe housing for the survivor. A model emergency transfer plan, created by HUD, is located here. The project's emergency transfer plan must be consistent with all parts of the Violence Against Women Act (HUD Guidance on final rule).

In addition to an emergency transfer plan, all projects must have a policy to ensure that survivors receive trauma-informed and survivor-centered services. The policy must also ensure that projects maximize client choice in housing and services while also ensuring safety and confidentiality for survivors.

The CoC recommends that projects apply this policy of trauma-informed and survivor-centered services to all populations in all CoC projects.

Trauma-informed: Approaches delivered with an understanding of the vulnerabilities and experiences of trauma survivors, including the prevalence and physical, social, and emotional impact of trauma. A trauma-informed approach recognizes signs of trauma in staff, clients, and others, and responds by integrating knowledge about trauma into policies, procedures, practices, and settings. Trauma-informed approaches place priority on restoring the survivor's feelings of safety, choice, and control. Projects, services, organizations, and communities can be trauma-informed.

Survivor-centered: Placing the survivor's priorities, needs, and interests at the center of the work with the survivor; providing nonjudgmental assistance, with an emphasis on client self-determination, where appropriate, and assisting survivors in making informed choices; ensuring that restoring survivors' feelings of safety and security are a priority and safeguarding against policies and practices that could inadvertently re-traumatize survivors; ensuring that survivors' rights, voices, and perspectives are incorporated when developing and implementing system- and community-based efforts that impact survivors.

Equal Access for Lesbian, Gay, Bisexual, and Transgender (LGBT) Persons

HUD-funded projects within the BoS CoC, including CoC projects, must have a policy prohibiting discrimination against program participants based on actual or perceived gender identity, sexual orientation, or marital status.

In accordance with HUD's 2012 Equal Access to Housing Rule, all projects must be available to all persons without regard to actual or perceived sexual orientation, gender identity, or marital status. Additionally, in accordance with HUD's 2016 Equal Access in Accordance with Gender Identity Rule, all projects must provide equal access to individuals according to their *stated* gender identity.

An example of a document projects can publically post to inform clients and staff of these requirements is located here.

Racial Equity

The BoS CoC commits to reducing racial disparities among our CoC projects and Local Continuums, both in access to housing and project outcomes. The CoC will use HMIS and PIT data to periodically measure our progress towards eliminating racial disparities. The CoC will also work with the standing BoS Racial Equity subcommittee to develop and implement strategies to help our CoC address racial disparities and advance racial equity.

Eligibility for Education Services

CoC projects must inform all program participants, up to age 24, of their age-appropriate eligibility for education services that they may be eligible for, both at intake and as necessary while enrolled in the project. This includes informing homeless students of their right to attend their school of origin (the school they attended before becoming homeless or the school in which they were last enrolled) and their right to access transportation services to attend that school. Educational

services may also include assistance from the local school district's homeless liaison, preschool programs, services for English language learners, etc.

CoC projects should work with children in their program to make sure they are enrolled in school as soon as possible. Projects should help children trying to enroll in school overcome barriers such as the lack of school records, immunization records, other required health records, proof of residency, guardianship, fines and fees, missed enrollment deadlines, etc.

A resource guide from the National Center for Homeless Education is located here. Also, FAQ related to the educational rights of children and youth in homeless situations, and OSPI guidance on the education of homeless children and youth.

Representative Membership on the Steering Committee

The CoC seeks to make its membership representative of the population served in the BoS CoC. To achieve this goal, the CoC will attempt to recruit members, paid or unpaid, with lived experience of homelessness. It will also involve, among other subpopulations, the Youth Action Board, formed as part of the Youth Homelessness Demonstration Program, in Steering Committee activities. Lastly, it will attempt to recruit members from local organizations that serve large portions of underrepresented groups to help bring a variety of perspectives to the BoS leadership.

Rapid Rehousing Rent Standard

Local Continuums must adopt a standard for determining the **percent** of income each household must pay towards rent while receiving rapid rehousing assistance. Flat rate payment models are not allowed.

Local Continuums can set the percentage based on local conditions, but it must be consistent across all CoC-funded RRH projects in the Local Continuum. Projects that serve one of three different populations within a Local Continuum (youth, single adults, or families with children) can adopt different rent standards. Individual 'hardship exemptions' can be granted to program participants on a case by case basis, supported by documentation.

6. APPENDIX

Committees of the Continuum Responsibilities and Operation

- **Planning**
- **Families with Children**
- **Veterans**
- **Families without Children/Chronic Homeless**
- **Youth**
- **Rating and Ranking**

Policies, Procedures and Standards

- Steering Committee Operating Procedures. Refer to requirements at <u>24 CFR part 578.7(a)(3).</u>
- Code of Conduct, Conflict of Interest and Recusal Process Policy (also see #2J above) The Board and Committee members must comply with the conflict of interest requirements at <u>24 CFR part 578.95(b).</u>
- <u>HMIS Information</u>
- Coordinated Intake and Assessment Systems must comply with <u>HUD Notice CPD-17-01</u>
- <u>Washington State Coordinated Entry Guidelines</u>
- <u>Notice CPD-16-11: Prioritizing of Vulnerable Homeless Persons, including Persons Experiencing Chronic Homelessness and Recordkeeping Requirements for Documenting Chronic Homeless Status</u>
- <u>2018 Population Estimates (OFM)</u>
- Consultation - List of Cities and Counties with Consolidated Planning responsibilities and HUD community development and housing grants
- <u>2018 Program NOFA</u>
- <u>Historical HUD CoC Awards</u>
- <u>2018 WA 501 BoS CoC Awards</u>

Consultation within the Balance of State CoC

Jurisdictions with HUD Consolidated Plans and/or direct HUD Housing and Community Grants which need to be consulted by Local Continuums regarding the use of their HUD grants and the Consolidated Planning process (as of Feb 2019).

Community	Consolidated Plan	Community Development Grant (CDBG)	HOME (Housing Grants for Low-Income Housing	Emergency Solutions Grant (ESG)	Housing Opportunities for Persons with HIV/AIDS (HOPWA)
Cities					
Anacortes	X	X	X (Skagit Co Consortia)		
Bellingham	X	X	X		
Bremerton	X	X	X (Kitsap Co)		
East Wenatchee City	X	X			

Kennewick	X	X	X (Benton-Franklin Consortia)		
Longview	X	X	X (Consortia)		
Mount Vernon	X	X	X (Skagit Co Consortia)		
Olympia	X	X	X (Thurston Co)		
Pasco	X	X	X (Benton-Franklin Consortia)		
Richland	X	X	X (Benton-Franklin Consortia)		
Walla Walla	X	X			
Wenatchee	X	X			
Yakima	X	X	X (Yakima Co. Consortia)		
Counties					
Kitsap Co	X	X	X		
Thurston Co	X	X	X (Thurston Co Consortia)		
Island Co	X		X (Skagit Co Consortia)		
Whatcom Co	X		X (Skagit Co Consortia)		
Skagit Co	X		X (Skagit Co Consortia)		
Yakima Co.	X		X (Yakima Co Consortia)		
WA State Dept of Commerce	X Covers all geographical areas of the State except Clark, King, Pierce, Snohomish, Spokane Cos and all Consolidated Plan jurisdictions listed above.	X Covers all geographical areas of the State except Clark, King, Pierce, Snohomish, Spokane Cos and all CDBG jurisdictions listed above.	X Covers all geographical areas of the State except Clark, King, Pierce, Snohomish, Spokane Cos and all HOME jurisdictions listed above.	X Covers all jurisdictions in the 34-county Balance of State	X Covers all jurisdictions of the State with the exception of Seattle