

West Central Minnesota Continuum of Care Homeless To Housed Regional Task Force By-Laws & Governance Charter

Article I: Name

Section 1. The West Central Minnesota Continuum of Care shall be known as the Homeless to Housed Task Force (hereinafter referred to as the HTH).

Article II: Vision

Section 1. The vision of the HTH is to create and sustain capacity throughout the West Central MN CoC system to consistently facilitate the movement of individuals/families toward permanent housing and successful independent living. Through coordination and cooperation, movement through this system will be accomplished in a smooth, seamless manner with positive outcomes for homeless individuals.

Article III: Purpose

Section 1. The purpose of this organization is to coordinate the Continuum of Care process for the West Central Region of Minnesota, serving as the HUD-designated primary decision making group and oversight board for the ten contiguous counties of: Becker, Clay, Douglas, Grant, Otter Tail, Pope, Stevens, Traverse, Wadena, and Wilkin. As the oversight committee the HTH responsibilities are:

- a. To ensure that the CoC is meeting all of the responsibilities assigned to it by HUD regulations and the HEARTH Act (see below);
- b. To help facilitate housing stability for persons who become homeless, or are at imminent risk of homelessness in a fair and supportive manner;
- c. To represent and encourage collaboration among the relevant organizations and programs serving persons who are homeless;
- d. To be inclusive of all the needs of all of West Central Minnesota region's homeless population, including the special service and housing needs of homeless subpopulations;
- e. To facilitate discussion and planning within and beyond the HUD CoC process on policy, program, and social issues related to ending homelessness; and
- f. To encourage and educate on service and housing best practices and quality performance.

Section 2. The Continuum of Care program is designed to assist sheltered and unsheltered homeless people by providing the housing and/or services needed to help individuals move into transitional and permanent housing, with the goal of long-term stability.

Section 3. An effective Continuum of Care system is comprehensive and coordinated.

Section 4. HUD identifies the fundamental components of a comprehensive Continuum of Care system to be:

- a. Promote community-wide commitment to the goal of ending homelessness
- b. Provide funding for efforts by nonprofit providers, States, and local governments to re-house homeless individuals and families rapidly while minimizing the trauma and dislocation caused to homeless individuals, families, and communities as a consequence of Homelessness.

- c. Promote access to and effective use of mainstream programs by homeless individuals and families.
- d. Optimize self-sufficiency among individuals and families experiencing homelessness.

Section 5. The Continuum of Care system should also include a focus on homelessness prevention strategies and services.

ARTICLE IV: RESPONSIBILITIES

As the designated board of the CoC for the geographic area, the WC CoC works with the CoC Collaborative Applicant to fulfill three major duties:

1. Operate a CoC, which must:
 - a. Hold meetings of the full membership, with published agendas, at least semiannually;
 - b. Publically invite new membership to join the WC CoC at least annually;
 - c. Adopt and follow a written process to select a WC CoC board to act on behalf of the CoC. The process must be reviewed, updated, and approved by the WC CoC membership at least once every 5 years;
 - d. Appoint committees, subcommittees, or workgroups as needed to help carry out the goals and responsibilities of the WC CoC;
 - e. In consultation with the CoC Collaborative Applicant and the HMIS Lead, develop, follow, and update annually a governance charter, which will include all procedures and policies needed to comply with CoC requirements as prescribed by HUD; and a code of conduct and recusal process for the WC CoC, its chair(s), and any person acting on behalf of the board;
 - f. In consultation with recipients and sub-recipients of CoC and Emergency Solutions Grant (hereinafter referred to as ESG) funding, establish performance targets appropriate for population and program type, monitor recipient and sub-recipient performance, evaluate outcomes, and take action against poor performers;
 - g. In consultation with recipients of CoC and ESG funds within the geographic area, establish and consistently follow written standards for providing CoC assistance. At a minimum, these written standards must include:
 - i. Policies and procedures for evaluating individuals' and families' eligibility for CoC assistance;
 - ii. Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
 - iii. Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid re-housing assistance;
 - iv. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid re-housing assistance;
 - v. Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and
 - vi. When the CoC is designated a high-performing community, policies and procedures for determining and prioritizing which eligible individuals and families will receive Homelessness Prevention Assistance.
2. Designating and operating an Homeless Management Information System (HMIS):
 - a. Designate a single HMIS for the geographic area;
 - b. Designate an eligible applicant to manage the CoC's HMIS, which will be known as the HMIS Lead;
 - c. Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS.

- d. Ensure consistent participation of recipients and sub-recipients of CoC and ESG funding in the HMIS;
 - e. Ensure the HMIS is administered in compliance with requirements prescribed by HUD.
3. Continuum of Care planning:
The CoC plan shall include the following:
- a. Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. At a minimum, such system encompasses the following: Outreach, engagement, and assessment; Shelter, housing, and supportive services; and Prevention strategies;
 - b. Plan and conduct an annual point-in-time sheltered (in collaboration with the State of MN quarterly sheltered count) and unsheltered count within the geographic area in adherence with HUD guidelines;
 - c. Conduct an annual gaps analysis of homeless needs and services in WC MN in accordance with HUD guidelines;
 - d. Plan to provide information and input to the State of MN Consolidated Plan; and
 - e. Coordination with the State of MN ESG program to determine a plan for allocating ESG funds and reporting on and evaluating the performance of ESG recipients and sub-recipients.

ARTICLE V: MEMBERSHIP

Section 1. Continuum of Care planning involves a membership that is extensive and inclusive.

Section 2. The HTH shall have three categories of membership/participation:

a. Board of Directors:

- i. The Board of Directors shall include representatives of relevant organizations serving homeless persons in the West Central MN region; at least one (1) homeless or formerly homeless individual; CoC Coordinator (non-voting member), and at least one (1) Emergency Solutions Representative. The State Interagency Task Force on Homelessness may also appoint a non-voting Ex-Officio member to serve on the board.
- ii. The Board of Directors is the official governing body of the Continuum, will make official decisions of the Task Force, and will conduct business as needed between task force meetings, making subsequent recommendations and reports to the Task Force. The Board is responsible for:
 - Bylaws Changes,
 - Annual Continuum of Care Plan,
 - Final Grant Ranking,
 - Assuring the CoC has a Centralized Assessment System,
 - Appointing Adhoc Committees and Workgroups,
 - Filling open board positions between annual meetings,
 - Working with membership to set standards for administering and monitoring CoC and ESG Assistance,
 - Developing and approving an annual HMIS Governance Agreement,
 - Approving the CoC Collaborative Agent/Fiscal Agent,
 - Annual review of CoC Coordinator,
 - Assuring an annual Exhibit 1 is submitted to HUD, and

- Determining the Unified Funding Agent, if applicable.
- iii. Board of Directors must show a vested interest in the Continuum of Care Process by entering into a membership agreement, committing to regular representation at all Board and Task Force Meetings and participation on one of the Committees.
- iv. Sporadic attendance may result in a temporarily loss of voting privileges. Non-attendance can result in an in-activation of membership.
- v. The HTH shall strive to have participation from all nine counties represented on the Board of Directors.
- vi. Board of Directors are required to sign and abide by the Code of Conduct located on the back of the Homeless to Housed General Membership Agreement.
- vii. Board Officers shall include; Chair, Vice Chair, Secretary, and Chairs of all Committees. Additionally, an ad hoc member may be appointed at the discretion of the committee. The Chair and Vice Chair position shall have staggered 2-year terms, the Chair position rotating between the private and public sector.

b. **Committees:** The HTH will have three standing committees: Evaluation & Performance, Coordinated Assessment and Data. These committees are notwithstanding to the changing needs of the CoC and will be reviewed by the Board yearly with necessary changes or additions approved by the Task Force. Ad hoc committees may be developed by the Board as needed to handle a specific situation or issue that does not fall within the assigned function of an existing standing committee.

- i. Evaluation & Performance – The Evaluation & Performance Committee is a standing committee under the oversight of the Board. The committee is responsible for:
 - a. Taking the lead in establishing performance measures for Emergency Solutions (ESG) and Continuum of Care (CoC) Programs.
 - b. Reviewing outcomes for ESG and CoC Programs.
 - c. Regularly monitoring system-wide performance targets.
 - d. Providing input to data committee on desired data input.
- ii. Data—The Data Committee is a standing committee. The committee comes under the oversight of the Board. The Data Committee is responsible for:
 - a. conducting an annual count of both sheltered and unsheltered homeless persons; ~~and~~
 - b. monitoring the Homeless Management Information System (HMIS) through tracking reports, participation, updates, agencies, and statewide efforts;
 - c. Conducting an annual gaps analysis of needs and services;
 - d. Annually review programs HMIS privacy, security, data quality;
 - e. Assure HMIS is administered in compliance with HUD; and
 - f. Collect and provide data needed for regional and statewide planning.
- iii. Coordinated Assessment – The Coordinated Assessment Committee is a standing committee under the oversight of the Board. This Committee is a joint CARES committee. The Coordinated Assessment Committee is responsible for:
 - a. Assuring the region has a Coordinated Assessment (CA) system that includes;
 - i. Evaluation of eligibility for assistance, and
 - ii. Prioritization of who receives CoC and ESG assistance.
 - b. Regularly reviewing system goals and outcomes;
 - c. Advocating for system changes that prohibit individuals from accessing services and housing that is determined beneficial to ending their homelessness.

Work Groups and Sub-Committees: The Board may establish work groups or ad hoc committees as it deems necessary. However, only the full CoC membership can designate a standing committee.

b. Task Force Membership:

- i. Task Force Membership shall include representation from both traditional homeless, social service and low-income housing providers; and from the community at-large.
- ii. The Task Force is responsible for;
 - a) Annual approval of Executive Officers and Committee Chairs,
 - b) Final approval of Bylaws Changes,
 - c) Participation in annual CoC Planning and Gaps Analysis, and
 - d) Annual review of program performance.
- viii. Task Force Members will be asked to enter into an annual membership agreement, committing to regular representation at all Task Force Meetings. Task Force Members are expected to designate at least 1 staff person to attend all Task Force Meetings and chosen Committee Meetings or find appropriate substitute to attend in their place.

ARTICLE VI: MEETINGS

Section 1. Task Force Meetings.

- (a) All meetings shall be held at the call of the Board Chair or Vice Chair.
- (b) Notice of time and place of all meetings shall be delivered personally, by email or fax to all members at least four days prior to the meeting; or by U.S. mail at least 6 business days prior to the meeting.
- (c) Meetings shall be held at least twice annually.
- (d) Meetings shall be held in accordance with Robert's Rules of Order.
- (e) The Chair and/or Vice Chair shall preside over all meetings when present. The chair shall appoint a member as acting chair in his/her absence.

Section 2. Special Meetings.

- (a) A special meeting of the Board, Task Force or Committee may be called by the Chair, Vice Chair or $\frac{1}{4}$ of the Board.
- (b) Proper notice shall be given for all special meetings.

Section 3. Electronic or Phone meetings.

- (a) Meetings of the HTH Membership, Board or Committees may be held electronically or by phone provided all persons participating may hear and speak to one another.

Section 4. Voting.

- (a) Votes will be limited to one per member agency.
- (b) Agencies applying for a grant may not vote in any ranking.
- (c) A quorum for the HTH Board will be met when a majority of active ~~Task Force~~ membership is represented.
- (d) A quorum for the Task Force and committees will be met when a majority of members are present.

Section 5. Action without voting.

- (a) Any action required or permitted to be taken by the Board or a Committee may be taken without a meeting if all of the entitled members individually or collectively consent in writing to such action. Such written consent or consents shall be filed with the minutes of the proceedings of the HTH.

Section 6. Annual Meeting.

- (a) Annual meetings of the Task Force shall be held for the purpose of electing Executive Officers and Committee Chairs and for the transaction of such other business as may come before the meeting.
- (b) Annual meetings shall be held as set by the Board not less than ten (10), or more than thirteen (13) months after the annual meeting held the prior year.
- (c) The annual meeting will be open to the public, and to the extent practicable, should be held in different locations around the region on a regular basis.

Section 7. Board Meetings.

- (a) All meetings shall be held at the call of the Board Chair or Vice Chair.
- (b) Notice of time and place of all meetings shall be delivered personally, by email or fax to all members at least four days prior to the meeting; or by U.S. mail at least 6 business days prior to the meeting.
- (c) Meetings shall be held at least 6 times annually.
- (d) Meetings shall be held in accordance with Robert's Rules of Order.
- (e) The Chair and/or Vice Chair shall preside over all meetings when present. The chair shall appoint a member as acting chair in his/her absence.

ARTICLE VII: EXECUTIVE OFFICERS

Section 1. Composition – The Executive Committee shall consist of a Chair, Vice Chair, Recording Secretary, HTH Coordinator, Committee Chairs and an ad hoc member appointed at the discretion of the committee.

Section 2. Election - At the Annual Meeting, a Chair, Vice Chair, Recording Secretary and Committee Chairs shall be elected by the Task Force to serve during the year or until the next Annual Meeting.

Section 2. Vacancy – In the event of a vacancy in any of the positions during the year, the vacant position should be filled at the next meeting of the task force or by a majority vote of the Executive Committee.

Section 3. Terms – The terms of Chair and Vice Chair shall be two years.

Section 4. Duties – The Executive Officers shall act in the way they believe to be in the best interest of the West Central CoC/HTH, and not as representatives of any other agencies/organization/entity.

Section 5. Removal of Officers – Any officer may be removed by $\frac{3}{4}$ majority of all officers for reason of non-participation, or not acting in the best interest of the Coc/HTH.

ARTICLE VIII: OTHER

Section 1. Certificates of Consistency

- (a) Certificates of Consistency may be requested by grantees within the continuum.
- (b) The Executive Committee will review Certificates of Consistency and the Executive Chair and/or Coordinator will be authorized to sign them.

Section 2. Fiscal Agent

- (a) As the HTH is not a registered non-profit, the must vote to approve an agency to act as an authorized fiscal agent, Collaborative Applicant or UFA.
- (b) The authorized fiscal agent shall provide the HTH with an annual financial report of CoC income and expenditures.
- (c) Additional financial reports or copies of related contracts must be provided to the HTH or Board upon written request within 15 business days of the request.

Section 3. Coordinator

- (a) The HTH may vote to employ someone to support and coordinate the vision and purpose of the organization.
- (b) The employee may be sought through a contractual, volunteer, or internship basis.
- (c) The employee may be contracted through the fiscal agent of HTH/West Central CoC or through the State of Minnesota.
- (d) All job descriptions, duties and assignments of the HTH staff/volunteers/interns shall be pre-approved by the Board.

Section 4. Membership Agreement

- (a) The HTH shall annually conduct a membership recruitment to solicit both Task Force and Committee membership.
- (b) A signed membership agreement is required to become an official member of the CoC.
- (c) Membership agreements can be signed at any time during the year.

Section 5. Code of Conduct

- (a) Members of the WC CoC and all committees will sign a Code of Conduct annually.
- (b) The Code of Conduct includes agreement to act in professional and collaborative manner; include a Conflict of interest policy.
- (c) Any member (CoC, Board, or Committee) having a conflict of interest or a conflict of responsibility on any matter shall refrain from voting on such matter.

APPENDIX A

Code of Conduct for the Homeless to Housed Task Force

Commitment and Professionalism are vital to creating and maintaining an effective and efficient Continuum of Care (CoC) process that will benefit each member of the Homeless to Housed Task Force (HTH) and the homeless men, women and children they represent. Both are integral to creating and sustaining a strong continuum in which collaboration and services can grow.

Obligations:

1. Members should strive to represent in a fair, honest and respectful manner their individual agencies and the homeless individuals and families that they are here to represent.
2. Members should be informed on the purpose of the HTH and its role in the CoC process.
3. Members should strive to stay up-to-date on HTH strategies and planning.
4. Members should strive to keep their promises and to avoid unwise or unclear commitments that they are unable to fulfill.
5. Members are expected to uphold professional standards of conduct, exhibiting respectfulness, fairness, and honesty.
6. Members should clarify their professional roles and obligations, exercise reasonable judgment, and take precautions to ensure that any potential biases or conflicts of interest do not unjustly affect the CoC process or other members of the HTH.
7. When conflicts occur among members, they should attempt to resolve these conflicts in a responsible fashion.
8. Leaders have the extra responsibility of setting an example by their personal performance and attitude that convey honest, respectful, and ethical values.
9. Members should consult with, refer to, or cooperate with other professionals and institutions to the extent needed to serve the best interests of those they represent.

As a member of the West Central Minnesota Homeless To Housed Task Force and/or affiliated committee, I agree to represent myself, my agency, my county, my region, and/or my state in a professional manner by adhering to the guidelines laid out in the Code of Conduct of the Homeless to Housed Task Force.

Homeless To Housed Task Force Individual Member/Agency Member

Date

APPENDIX B

WEST CENTRAL MN CONTINUUM OF CARE HOMELESS TO HOUSED TASK FORCE MEMBERSHIP AGREEMENT

Whereas, the Homeless to Housed Task Force requires active, diverse, and region-wide participation to effectively prepare and carry-out a Region-wide Continuum of Care Plan;

Whereas, the Homeless to Housed Task Force desires participation from members who are interested and willing to commit to supporting the Task Force in a professional and active manner; and

Whereas, _____ (*insert agency name*), is willing and interested in becoming a Member of the Homeless to Housed Task Force.

Therefore, the above named Member Agency/Organization agrees to become a Member of the Homeless to Housed Task Force, understanding and agreeing to the following membership policies and the organizational code of conduct.

I. Membership Policies:

- A.** Each Member Agency/Organization shall appoint one (1) individual to serve as a Member Representative on the Homeless to Housed Task Force and one standing Committee;
- B.** Additional agency staff, administration, or board members are invited to attend Task Force meetings and participate on committees;
- C.** Member Agencies are expected to strive for 100% attendance at all scheduled Task Force and chosen Standing Committee Meetings/Activities;
- D.** If a representative is unable to attend a scheduled Task Force or Committee Meeting, an alternative representative should be appointed to attend in the member representatives' absence;
- E.** At each meeting, voting rights shall be given to only one (1) representative from each member agency;
- F.** Member Agencies without consistent representation (missing 3 or more meetings annually), will forfeit voting privileges for that year;
- G.** Representatives should come to each meeting prepared to actively participate;
- H.** All members are expected to abide by the Homeless to Housed Code of Conduct while participating in organizational meetings or representing the Task Force;
- I.** Member Agencies are responsible for notifying the Homeless to Housed Coordinator of any changes in contact information for their agency or of their Member Representative.

The following individual(s) have been assigned to serve as Member Representatives:

Name	Title/Position	Address	Phone/Email	Committee (circle choice)	Counties Represented (circle all that apply)
				Grant Membership Bylaws Data Collection	Becker Clay Douglas Grant Otter Tail Stevens Pope Traverse Wilkin
				Grant Membership Bylaws Data Collection	Becker Clay Douglas Grant Otter Tail Stevens Pope Traverse Wilkin
				Grant Membership Bylaws Data Collection	Becker Clay Douglas Grant Otter Tail Stevens Pope Traverse Wilkin

II. Code of Conduct for the Homeless to Housed Task Force

Commitment and Professionalism are vital to creating and maintaining an effective and efficient Continuum of Care (CoC) process that will benefit each member of the Homeless to Housed Task Force (HTH) and the homeless men, women and children they represent. Both are integral to creating and sustaining a strong continuum in which collaboration and services can grow.

A. Conduct Obligations:

10. Members should strive to represent in a fair, honest and respectful manner their individual agencies and the homeless individuals and families that they are here to represent.
11. Members should be informed on the purpose of the HTH and its role in the CoC process.
12. Members should strive to stay up-to-date on HTH strategies and planning.
13. Members should strive to keep their promises and to avoid unwise or unclear commitments that they are unable to fulfill.
14. Members are expected to uphold professional standards of conduct, exhibiting respectfulness, fairness, and honesty.
15. Members should clarify their professional roles and obligations, exercise reasonable judgment, and take precautions to ensure that any potential biases or conflicts of interest do not unjustly affect the CoC process or other members of the HTH.
16. When conflicts occur among members, they should attempt to resolve these conflicts in a responsible fashion.
17. Leaders have the extra responsibility of setting an example by their personal performance and attitude that convey honest, respectful, and ethical values.
18. Members should consult with, refer to, or cooperate with other professionals and institutions to the extent needed to serve the best interests of those they represent.

Signature of Member Agency/Organization Authorized Representative

Date

APPENDIX C

WEST CENTRAL MN CONTINUUM OF CARE
GEOGRAPHIC REGION

BECKER	CLAY	DOUGLAS	GRANT	OTTER TAIL	POPE	STEVENS	TRAVERSE	WILKIN
Audubon Callaway Detroit Lakes Frazee Lake Park Ogema Osage Ponsford Richwood Snellman White Earth Wolf Lake	Barnesville Comstock Dilworth Felton Georgetown Glyndon Hawley Hitterdal Moorhead Sabin Ulen. There are also 7 villages in Clay County including: Kragnes, Downer, Rustad, Dale, Rollag, Averill, and Baker.	Alexandria Brandon Carlos Evansville Forada Garfield Kensington Millerville Miltona Nelson Osakis	Ashby Barrett Elbow Lake Erdahl Herman Hoffman Norcross Wendell	Battle Lake Bluffton Clitherall Dalton Deer Creek Dent Elizabeth Erhard Fergus Falls Henning New York Mills Ottertail Parkers Prairie Pelican Rapids Perham Richville Rothsay Underwood Urbank Vergas Vining Wadena	Cyrus Farwell Glenwood Long Beach Lowry Sedan Starbuck Villard Westport	Donnelly Chokio Alberta Synnes Swan Lake Stevens Scott Rendsville Pepperton Morris Moore Horton Hodges Framnas Everglade Eldorado Daren Baker	Browns Vall Dumont Tintah Wheaton	Breckenridge Brushvale Campbell Doran Everdell Foxhome Kent Kutzer Lawndale Nashua Rothsay Tenney Wolverton.

(including Counties, Cities and Villages)

APPENDIX D

**MEMORANDUM OF UNDERSTANDING for
HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) LEAD AGENCY**
between
West Central Minnesota Continuum of Care (CoC)
and
Amherst H. Wilder Foundation (Wilder)

1. Purpose

This Memorandum of Understanding is intended to signify agreement between the West Central Continuum of Care and Amherst H. Wilder Foundation in its role as the lead HMIS Agency as to the roles and responsibilities of each party.

The West Central CoC has established a HMIS to record and store client-level information about the numbers, characteristics, and needs of persons who use homeless housing and supportive services and for persons at risk of homelessness who receive assistance. Ten CoCs in Minnesota (MN) jointly agree to operate a statewide HMIS and to provide HMIS oversight through an HMIS Governing Group.

HMIS is used to aggregate data about the extent and nature of homelessness over time; produce an unduplicated count of homeless persons; understand patterns of service use; and measure the effectiveness of homeless assistance projects and programs. Data produced are used for planning, education and reporting to funders.

PLEASE NOTE:

There are several significant HMIS planning efforts taking place as this MOU is being drafted. Recommendations arising from these initiatives are likely to lead to significant changes to the system that enable and support greater CoC compliance with HEARTH Act requirements and expectations. As the HMIS is modified to provide greater CoC administrative access for purposes of monitoring and reporting on provider and system-level performance, the roles and responsibilities described herein shall be revised accordingly.

2. Designations

- a. HMIS Software - The CoC designates the Bowman Systems' ServicePoint (SP) as the primary technical solution for Minnesota's HMIS.
- b. HMIS Lead - The CoC designates Wilder Research, a division of the Amherst H. Wilder Foundation, as the official statewide MN HMIS lead for the CoC's geographic area.

3. Responsibilities of CoC

- a. Designating a single information system as the official HMIS software for the geographic area.
- b. Designating a HMIS Lead to operate the system.
- c. Providing for governance of the HMIS Lead, including:

- i. The requirement that the HMIS Lead enter into written HMIS Participation Agreements with each Contributing HMIS Organization (hereinafter referred to as "CHO") requiring the CHO to comply with federal regulations regarding HMIS
- ii. Holding CHOs responsible for failure to comply with regulations, including imposing sanctions; and
- iii. The participation fee, if any, charged by the HMIS;
- d. Maintaining documentation of compliance with federal regulations and with the MOU; and
- e. Reviewing, revising, and approving the HMIS policies, privacy and security plan, and data quality plan for the HMIS as required by federal regulation.
- f. Develop and implement a plan for monitoring the HMIS to ensure that:
 - i. CHO consistently participate in HMIS;
 - ii. HMIS is satisfying the requirements of all regulations and notices issued by HUD;
 - iii. The HMIS Lead is fulfilling the obligations outlined in its HMIS Governance Charter and Agreement with the CoC, including the obligation to enter into written participation agreements with each contributing CHO
- b. Oversee and monitor HMIS data collection and production of the following reports:
 - i. Sheltered point-in-time count;
 - ii. Housing Inventory Chart;
 - iii. Annual Homeless Assessment Report (AHAR); and
 - iv. Annual Performance Reports (APRs).

4. Responsibilities of the HMIS Lead:

- a. Facilitating, monitoring, and reporting to CoC the participation of all agencies submitting data to HMIS and ensuring compliance with federal HMIS requirements;
- b. Implementation of and compliance with written HMIS policies and procedures as approved by the statewide governance committee and in accordance with § 580.31 for all CHOs;
- c. Executing a written HMIS Participation Agreement with each CHO as they start participating, which includes the obligations and authority of the HMIS Lead and CHO, the requirements of the security plan and privacy policy with which the CHO must abide, sanctions for violating the HMIS Participation Agreement, and an agreement that the HMIS Lead and the CHO will process Protected Identifying Information consistent with the agreement;
- d. Serving as the applicant to the US Department of Housing and Urban Development (HUD) for CoC grant funds to be used for HMIS activities for the CoC's geographic area, as directed by the CoC in consultation with the statewide Governance committee, and entering into grant agreements with HUD to carry out the HUD-approved HMIS activities;
- e. Monitoring data quality and taking necessary actions to maintain input of high-quality data from all CHOs;
- f. The HMIS Lead must implement a security plan, an updated data quality plan, and a privacy policy to the CoC on a timeline agreed on by the CoC, HMIS Governing Group and HMIS Lead after the effective date of the HUD final rule establishing the requirements of these plans. The HMIS Lead, in conjunction with the HMIS Governing Group and CoC, must review and update the plans and policy at least annually. During this process, the HMIS Lead must seek and incorporate feedback from the CoC and CHO.

5. Duties of the HMIS Lead

- a. CoC HMIS Policies and Procedures - The HMIS Lead must adopt written policies and procedures for the operation of the HMIS that apply to the HMIS Lead, its CHOs, and the CoC. These policies and procedures will be developed with the HMIS Governing Group.
- b. Unduplicated Count - The HMIS Lead must, at least once annually, or upon request from HUD, submit to the CoC an unduplicated count of clients served and an analysis of unduplicated counts, when requested by HUD.
- c. Reporting - The HMIS Lead shall submit reports to HUD as required by HUD.
- d. Privacy - The HMIS Lead must implement a privacy policy which is developed by HMIS Governing Group.
- e. HMIS Standards - The HMIS Lead, in contracting an HMIS vendor, must require the HMIS vendor and the software to comply with HMIS standards issued by HUD as part of its contract.
- f. Participation Fee -The HMIS Lead may charge a participation fee for CHOs. The participation/user fee shall be reviewed and approved annually by the CoC and HMIS Governing Group.

6. Responsibilities of the HMIS Governing Group

- a. Developing HMIS policies and procedures. These policies and procedures must comply with all applicable Federal law and regulations, and applicable state or local governmental requirements. The HMIS Lead may not establish local standards for any CHO that contradicts, undermines, or interferes with the implementation of the HMIS standards as prescribed in b. Privacy
- b. Developing a data privacy policy. At a minimum, the privacy policy must include data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description; access and correction standards; accountability standards; protections for victims of domestic violence, dating violence, sexual assault, and stalking; and such additional information and standards as may be established by HUD in notice. Every organization with access to protected identifying information must implement procedures to ensure and monitor its compliance with applicable agreements and the requirements of this part, including enforcement of sanctions for noncompliance.
- c. Overseeing and monitoring HMIS funding management and performance.
- d. Providing directions and guidelines on HMIS practices.



Wilder Foundation Staff



CoC Staff
Executive Director
Clay County HRA
Collaborative Applicant

APPENDIX E

West Central Minnesota Permanent Housing Prioritization Policy

The West Central MN CoC has expanded our prioritization policy requiring all Permanent Supportive Housing projects to prioritize those with the highest barriers when filling homeless dedicated units.

HUD Goals: HUD seeks to achieve three goals through CPD-14-012:

1. Establish an order of priority for dedicated and prioritized PSH beds which CoCs are encouraged to adopt in order to ensure that those persons with the most severe service needs are given first priority.
2. Inform the selection process for PSH assistance not dedicated or prioritized for chronic homelessness to prioritize persons who do not yet meet the definition of chronic homelessness but are most at risk of becoming chronically homeless.
3. Provide uniform recordkeeping requirements for all recipients of CoC Program funded PSH for documenting chronically homeless status of program participants when required to do so as well as provide guidance on recommended documentation standards that CoCs may require of its recipients of CoC Program-funded PSH if the priorities included in the Notice are adopted by the CoC.

CoC Policy: All dedicated homeless permanent supportive housing beds in the West Central Continuum shall be prioritized in the following order::

1. VI-SPDAT Score: Persons with the highest VI-SPDAT score shall be selected for any PSH open unit first. The CoC feels the VI-SPDAT scores help identify those with the greatest need for PSH by triaging; medical, social, mental health, and housing barriers.
2. Chronic Homeless: Given equal VI-SPDAT scores, priority shall be given to persons meeting the HUD Chronic Homeless Definition.
3. Severity of Service Needs: If both VI-SPDAT score and CH eligibility are equal, providers may be required to further identify and prioritize those persons who have the most severe service needs. In considering severity of needs the following shall be considered:
 - a. History of high utilization of crisis services, which include but are not limited to, emergency rooms, detox, jails, and psychiatric facilities; or
 - b. Significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing.

Verification: The CoC requires that Homeless status, VI-SPDAT score, Chronic Homeless Status and Severity of needs be verified and documented according to CoC policy.

APPENDIX F

West Central CoC Policy Requiring School Enrollment and Connection to Appropriate Services for All Children

Educational and supportive service needs of families with minor children will be fully assessed with expediency upon entry to the program. School-aged youth will be enrolled in school immediately, working collaboratively with the designated school homeless liaison in the Local Educational Agency (LEA) to ensure that all educational assessments are completed. To the extent feasible, students in homeless situations should be kept in their school of origin (defined as the school the student attended when permanently housed or the school in which the student was last enrolled), unless it is against the parent's or guardian's wishes. Students in homeless situations must have access to the educational and other services they need to ensure that they have an opportunity to meet the same challenging state student academic achievement standards to which all students are held. Appropriate referrals will be made in the community to address supportive service needs of all family members.

Approved February 2012

APPENDIX G

Family Separation and Emergency Shelter and Transitional Housing

The West Central MN Continuum of Care believes that families experiencing homelessness should not be separated unless the health and well-being of children are at immediate risk. In addition, a broad definition of family should be used that allows for female headed, male-headed, two parent, same sex parent, LGBT parent, and extended families to be served together with their children.

HUD issued regulations that all ESG funded shelters and transitional housing programs are prohibited from denying access to families based on the age of child. Non-compliance may result in the removal of ESG funds. The CoC has expanded this policy to include any shelter or TH program participating in CES. Specific details include:

1. IN GENERAL.—... any project sponsor receiving funds under this title to provide emergency shelter, transitional housing, or permanent housing to families with children under age 18 shall not deny admission to any family based on the age of any child under age 18. “
2. EXCEPTION.—Notwithstanding the requirement under subsection (a), project sponsors of transitional housing receiving funds under this title may target transitional housing resources to families with children of a specific age only if the project sponsor— “(1) operates a transitional housing program that has a primary purpose of implementing an evidence- based practice that requires that housing units be targeted to families with children in a specific age group; and “(2) provides such assurances, as the Secretary shall require, that an equivalent appropriate alternative living arrangement for the whole family or household unit has been secured

Trauma and Separation

We acknowledge that people who are homeless have experienced high rates of traumatic events leading to their homelessness or because of their homelessness. Therefore, we do not want to add to the familie’s trauma by asking parents to separate from their children, and children from their parents while in the midst of a housing crisis that has already rocked the family.

ESG Interim Rule language on family separation:

HUD regulation includes: “(b) Prohibition against involuntary family separation. The age, of a child under age 18 must not be used as a basis for denying any family’s admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.”

Approved November 2015