Before Starting the CoC Application

The CoC Consolidated Application is made up of two parts: the CoC Application and the CoC Priority Listing, with all of the CoC's project applications either approved and ranked, or rejected. The Collaborative Applicant is responsible for submitting both the CoC Application and the CoC Priority Listing in order for the CoC Consolidated Application to be considered complete.

The Collaborative Applicant is responsible for:

- 1. Reviewing the FY 2017 CoC Program Competition NOFA in its entirety for specific application and program requirements.
- 2. Ensuring all questions are answered completely.
- 3. Reviewing the FY 2017 CoC Consolidated Application Detailed Instructions, which gives additional information for each question.
- 4. Ensuring all imported responses in the application are fully reviewed and updated as needed.
- 5. The Collaborative Applicant must review and utilize responses provided by project applicants in their Project Applications.
- 6. Some questions require the Collaborative Applicant to attach documentation to receive credit for the question. This will be identified in the question.
- Note: For some questions, HUD has provided documents to assist Collaborative Applicants in filling out responses. These are noted in the application.
- All questions marked with an asterisk (*) are mandatory and must be completed in order to submit the CoC Application.

For CoC Application Detailed Instructions click here.

1A. Continuum of Care (CoC) Identification

Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1A-1. CoC Name and Number: TX-604 - Waco/McLennan County CoC

1A-2. Collaborative Applicant Name: Heart of Texas Homeless Coalition

1A-3. CoC Designation: CA

1A-4. HMIS Lead: Heart of Texas Homeless Coalition

1B. Continuum of Care (CoC) Engagement

Instructions:

FY2017 CoC Application

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1B-1. From the list below, select those organization(s) and/or person(s) that participate in CoC meetings. Using the drop-down boxes, indicate if the organization(s) and/or person(s): (1) participate in CoC meetings; and (2) vote, including selection of CoC Board members.

Responses should be for the period from 5/1/16 to 4/30/17.

Organization/Person Categories	Participates in CoC Meetings	Votes, including electing CoC Board Members
Local Government Staff/Officials	Yes	Yes
CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes
Law Enforcement	No	No
Local Jail(s)	No	No
Hospital(s)	No	No
EMT/Crisis Response Team(s)	Yes	Yes
Mental Health Service Organizations	Yes	Yes
Substance Abuse Service Organizations	Yes	Yes
Affordable Housing Developer(s)	Yes	Yes
Disability Service Organizations	Yes	Yes
Disability Advocates	Yes	Yes
Public Housing Authorities	Yes	Yes
CoC Funded Youth Homeless Organizations	Yes	Yes
Non-CoC Funded Youth Homeless Organizations	Yes	Yes
Youth Advocates	Yes	Yes
School Administrators/Homeless Liaisons	Yes	Yes
CoC Funded Victim Service Providers	Yes	Yes
Non-CoC Funded Victim Service Providers	Yes	Yes
Domestic Violence Advocates	Yes	Yes
Street Outreach Team(s)	Yes	Yes
Lesbian, Gay, Bisexual, Transgender (LGBT) Advocates	Yes	Yes
LGBT Service Organizations	Not Applicable	No
Agencies that serve survivors of human trafficking	Yes	Yes
Other homeless subpopulation advocates	Yes	Yes
Homeless or Formerly Homeless Persons	Yes	Yes
Other:(limit 50 characters)		

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Veterans One Stop	Yes	Yes
The Cove Homeless Youth Services	Yes	Yes

Applicant must select Yes, No or Not Applicable for all of the listed organization/person categories in 1B-1.

1B-1a. Describe the specific strategy(s) the CoC uses to solicit and consider opinions from organizations and/or persons that have an interest in preventing or ending homelessness. (limit 1000 characters)

The Heart of Texas Homeless Coalition (HOTHC) serves a six county catchment area with year round open membership invitation. Member agencies include those that serve homeless individuals and families and have expertise and knowledge or interest in homelessness issues including: public housing authorities, local government, school districts with unaccompanied youth, veterans service agencies, domestic violence programs, substance use and/or mental health agencies, youth advocates, faith-based organizations, etc. Formerly homeless persons also participate. Each year in strategic planning meetings, general membership share ideas to address homelessness and identify top priorities with action plans. Input is gained throughout the year as goals are met. Two Advisory Committees consisting of interested HOTHC Members, CoC Lead, HMIS Lead and providers meet at least quarterly and offer direction to the CoC in the areas of: HMIS, CoC Planning and Coordinated Entry. All these meetings are open.

1B-2. Describe the CoC's open invitation process for soliciting new members, including any special outreach. (limit 1000 characters)

HOTHC solicited membership in the past year through annual public notice in each county seat, event postings of monthly meetings on the Coalition Facebook page, notifications on the HOTHC website of local events, email, and local networking. HOTHC participated twice this year in Project Homeless Connect, an event that focuses on connecting those who are homeless with local service providers. Through these events, HOTHC was able to encourage participation in the HOTHC general membership meetings and inform the media about the work that HOTHC does within the community. This event also serves to solicit participation of those who are homeless to be involved in HOTHC activities and planning.

1B-3. Describe how the CoC notified the public that it will accept and consider proposals from organizations that have not previously received CoC Program funding in the FY 2017 CoC Program Competition, even if the CoC is not applying for new projects in FY 2017. The response must include the date(s) the CoC made publicly knowing they were open to proposals. (limit 1000 characters)

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HOTHC notified the public about the FY 2017 CoC Program Competition at the HOTHC general meeting on 7/21/17 and by email on 8/7/17; agencies who had never applied before were encouraged to apply and the CoC Lead provided the membership with a timeline of internal deadlines. CoC contact information was given if there were questions and the CoC Lead offered to assist new participants in the process of getting set up to apply.On the HOTHC website, the NOFA announcement, Timeline and NOFA Requirements were posted 7/19/17. Funding availability notice was posted on the City of Waco website on 7/19/17.Postings on the HOTHC Facebook page were 7/14/17, and reminders of deadlines on 8/7/17. Notice that HOTHC was accepting applications was posted on public notice boards in all 6 counties on 8/11/17.All applications are accepted for review and subject to threshold requirements, scoring/ranking and/or reallocation. Deadlines for submission of renewal projects is 8/21/17 and new projects by 8/25/17.

1C. Continuum of Care (CoC) Coordination

Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1C-1. Using the chart below, identify the Federal, State, Local, Private and Other organizations that serve homeless individuals, families, unaccompanied youth, persons who are fleeing domestic violence, or those at risk of homelessness that are included in the CoCs coordination; planning and operation of projects.

Only select "Not Applicable" if the funding source(s) do not exist in the CoC's geographic area.

Entities or Organizations the CoC coordinates planning and operation of projects	Coordinates with Planning and Operation of Projects
Housing Opportunities for Persons with AIDS (HOPWA)	Yes
Temporary Assistance for Needy Families (TANF)	Yes
Runaway and Homeless Youth (RHY)	Yes
Head Start Program	Yes
Housing and service programs funded through Department of Justice (DOJ) resources	Yes
Housing and service programs funded through Health and Human Services (HHS) resources	Yes
Housing and service programs funded through other Federal resources	Yes
Housing and service programs funded through state government resources	Yes
Housing and service programs funded through local government resources	Yes
Housing and service programs funded through private entities, including foundations	Yes
Other:(limit 50 characters)	

1C-2. Describe how the CoC actively consults with Emergency Solutions Grant (ESG) recipient's in the planning and allocation of ESG funds. Include in the response: (1) the interactions that occur between the CoC and the ESG Recipients in the planning and allocation of funds; (2) the CoCs participation in the local Consolidated Plan jurisdiction(s) process by providing Point-in-Time (PIT) and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions; and (3) how the CoC ensures local homelessness information is clearly communicated and addressed in Consolidated Plan updates. (limit 1000 characters)

Waco receives ESG funding from the State of Texas. Funds are allocated according to priorities set by the CoC. Funding of a project requires approval from the State of Texas, HOTHC, and the City of Waco. The City of Waco is

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the only Consolidated Plan jurisdiction located within the CoC area. The City of Waco serves as the CoC lead agency and the staff member responsible for drafting the Consolidated Plan is housed in the same city department as staff that coordinates the activities of the CoC. This co-location lends itself to natural collaboration. The Consolidated Plan is completed every 5 years and an Annual Action Plan is drafted each year. The CoC meets with City of Waco staff for collaboration on the development of each plan and provides information, such as PIT count data and HOTHC strategic plan goals and strategies, for use in the consolidated plan. This collaboration is done through in-person meetings and email.

1C-3. CoCs must demonstrate the local efforts to address the unique needs of persons, and their families, fleeing domestic violence that includes access to housing and services that prioritizes safety and confidentiality of program participants. (limit 1000 characters)

The CoC coordinates with Family Abuse Center (FAC) to maintain a high level of safety and security for those receiving its services. FAC provides services within the entire CoC area, abides by all safety protocols, its location is undisclosed, uses a HUD approved secure data system, and confidentiality is maintained for participants. FAC uses Housing First approach and offers shelter care, RR, PSH, TH and a host of SS at no cost to the individual from the Central Texas area to address the unique challenges individuals face due to DV issues. The CoC has adopted victim-centered practices and a policy for its coordinated assessment process where those stating that they are fleeing domestic violence are immediately referred to FAC. If the individual self-determines that they do not wish to receive services from FAC, then they are able to complete the coordinated assessment intake tool (VI-SPDAT) and receive other appropriate services available within the CoC.

1C-3a. CoCs must describe the following: (1) how regular training is provided to CoC providers and operators of coordinated entry processes that addresses best practices in serving survivors of domestic violence; (2) how the CoC uses statistics and other available data about domestic violence, including aggregate data from comparable databases, as appropriate, to assess the scope of community needs related to domestic violence and homelessness; and (3) the CoC safety and planning protocols and how they are included in the coordinated assessment. (limit 1,000 characters)

Family Abuse Center (FAC), our CoC's domestic violence provider, conducts an annual conference for the local community to provide training on best practices in serving survivors of domestic violence. Coordinated Assessment intake staff are educated on policies regarding confidentiality, safety protocols, and ensuring non-disclosure of secure service locations. The CoC HMIS Administrator provides annual on-site visits and is available as needed regarding data entry and management. Family Abuse Center uses OSNIUM as the comparable database. Osnium was customized by the Texas Council on Family Violence to include all data required by the HMIS system and other common DV funders. All aggregate data is shared with the CoC quarterly, as well as annually with the APR for use in determining community service needs

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or gaps. FAC has been actively engaged in designing the coordinated access system so that dv survivors are protected and directed appropriately to services within our community.

1C-4. Using the chart provided, for each of the Public Housing Agency's (PHA) in the CoC's geographic area: (1) identify the percentage of new admissions to the Public Housing or Housing Choice Voucher (HCV) Programs in the PHA's that were homeless at the time of admission; and (2) indicate whether the PHA has a homeless admission preference in its Public Housing and/or HCV program.

Public Housing and/or HCV program. Attachment Required: If the CoC selected, "Yes-Public Housing", "Yes-HCV" or "Yes-Both", attach an excerpt from the PHA(s) written policies or a letter from the PHA(s) that addresses homeless preference.

Public Housing Agency Name	% New Admissions into Public Housing and Housing Choice Voucher Program during FY 2016 who were homeless at entry	PHA has General or Limited Homeless Preference
Waco Housing Authority	11.00%	Yes-Both
Housing Authority of Coolidge		No
Housing Authority of Wortham		No
Mexia Housing Authority		No
Housing Authority of Hubbard		No

If you select "Yes--Public Housing," "Yes--HCV," or "Yes--Both" for "PHA has general or limited homeless preference," you must attach documentation of the preference from the PHA in order to receive credit.

1C-4a. For each PHA where there is not a homeless admission preference in their written policies, identify the steps the CoC has taken to encourage the PHA to adopt such a policy. (limit 1000 characters)

A letter was sent by the CoC Lead to each of the PHAs in the CoC region requesting from them to identify if they have a homeless preference and to encourage them to adopt a homeless admission preference if one was not identified in their written policies. Waco Housing Authority responded to this request and identified that they have a homeless preference in their policies. Waco Housing Authority is by far our largest PHA and is highly involved in Homeless Coalition activities. Follow up calls were made to each of the remaining 4 PHAs listed. Of those, 3 PHAs were not interested in adding a preference. Only 1 PHA, Housing Authority of Wortham, states their program has a preference for victims of family abuse and would consider adding preference for homeless. The executive director would like more information on the process of gaining proof of homelessness before agreeing to have the preference added in their PHA policies. Follow up information will be sent for further discussion.

1C-5. Describe the actions the CoC has taken to: (1) address the needs of

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Lesbian, Gay, Bisexual, Transgender (LGBT) individuals and their families experiencing homelessness, (2) conduct regular CoC-wide training with providers on how to effectively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Idenity, including Gender Identify Equal Access to Housing, Fina Rule; and (3) implementation of an anti-discrimination policy. (limit 1000 characters)

HOTHC provided multiple trainings about the Equal Access Rule to the CoC during March 2017. The purpose of this training was to discuss with CoC providers how to effectively implement the ruling at each agency and to educate providers of the needs of Lesbian, Gay, Bisexual, and Transgender (LGBT) individuals and their families experiencing homelessness. Agencies were provided with tools on how to improve their operations and policies. Each agency in the CoC area was tasked with identifying their anti-discrimination policy, and if one was lacking, to create one to be added to their policies and procedure manual. These policies were submitted to the CoC for evaluation. The CoC will include a CoC-wide anti-discrimination policy during Fall policy and procedure review.

1C-6. Criminalization: Select the specific strategies implemented by the CoC to prevent the criminalization of homelessness in the CoC's geographic area. Select all that apply.

Engaged/educated local policymakers:	X
Engaged/educated law enforcement:	X
Engaged/educated local business leaders	Х
Implemented communitywide plans:	Х
No strategies have been implemented	
Other:(limit 50 characters)	
PATH & Waco PD -street outreach together 1X mo.	X
Training from National Coalition for the Homeless	X

When "No Strategies have been implemented" is selected no other checkbox may be selected.

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1D. Continuum of Care (CoC) Discharge Planning

Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1D-1. Discharge Planning-State and Local: Select from the list provided, the systems of care the CoC coordinates with and assists in state and local discharge planning efforts to ensure those who are discharged from that system of care are not released directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply.

Foster Care:	X
Health Care:	X
Mental Health Care:	X
Correctional Facilities:	Х
None:	

1D-1a. If the applicant did not check all the boxes in 1D-1, provide: (1) an explanation of the reason(s) the CoC does not have a discharge policy in place for the system of care; and (2) provide the actions the CoC is taking or plans to take to coordinate with or assist the State and local discharge planning efforts to ensure persons are not discharged to the street, emergency shelters, or other homeless assistance programs. (limit 1000 characters)

not applicable

1D-2. Discharge Planning: Select the system(s) of care within the CoC's geographic area the CoC actively coordinates with to ensure persons who have resided in any of the institutions listed below longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply.

Foster Care:		Х
Health Care:		Х
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Mental Health Care:	Х
Correctional Facilities:	X
None:	

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1E. Continuum of Care (CoC) Project Review, Ranking, and Selection

Instructions

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1E-1. Using the drop-down menu, select the appropriate response(s) that demonstrate the process the CoC used to rank and select project applications in the FY 2017 CoC Program Competition which included (1) the use of objective criteria; (2) at least one factor related to achieving positive housing outcomes; and (3) included a specific method for evaluating projects submitted by victim service providers.

Attachment Required: Public posting of documentation that supports the process the CoC used to rank and select project application.

Used Objective Criteria for Review, Rating, Ranking and Section	Yes
Included at least one factor related to achieving positive housing outcomes	Yes
Included a specific method for evaluating projects submitted by victim service providers	Yes

1E-2. Severity of Needs and Vulnerabilities

CoCs must provide the extent the CoC considered the severity of needs and vulnerabilities experienced by program participants in their project ranking and selection process. Describe: (1) the specific vulnerabilities the CoC considered; and (2) how the CoC takes these vulnerabilities into account during the ranking and selection process. (See the CoC Application Detailed Instructions for examples of severity of needs and vulnerabilities.) (limit 1000 characters)

The HOTHC Scoring and Ranking Committee evaluates project applications based on HUD priorities, program performance, PIT data, APR data, population served, and audits. Severity of needs and vulnerabilities considered were the "hard to serve" population which includes serving individuals who are literally homeless and those with no income. Our Scoring Rubric included 20 points out of 200 based on serving these individuals. Points were also given to projects using the Housing First approach which ensures that those individuals who have the greatest challenges or barriers are offered assistance without delay. Projects who serve these high needs populations receive additional points in a ranking system where projects with the most points are prioritized in scoring order. This practice includes reallocation of lowest preforming projects to meet gaps and needs within the CoC Community.

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1E-3. Using the following checklist, select: (1) how the CoC made publicly available to potential project applicants an objective ranking and selection process that was used for all project (new and renewal) at least 2 days before the application submission deadline; and (2) all parts of the CoC Consolidated Application, the CoC Application attachments, Priority Listing that includes the reallocation forms and Project Listings that show all project applications submitted to the CoC were either accepted and ranked, or rejected and were made publicly available to project applicants, community members and key stakeholders.

Attachment Required: Documentation demonstrating the objective ranking and selections process and the final version of the completed CoC Consolidated Application, including the CoC Application with attachments, Priority Listing with reallocation forms and all project applications that were accepted and ranked, or rejected (new and renewal) was made publicly available. Attachments must clearly show the date the documents were publicly posted.

Public Posting	
CoC or other Website	X
Email	X
Mail	
Advertising in Local Newspaper(s)	
Advertising on Radio or Television	
Social Media (Twitter, Facebook, etc.)	X

1E-4. Reallocation: Applicants must demonstrate the ability to reallocate lower performing projects to create new, higher performing projects. CoC's may choose from one of the following two options below to answer this question. You do not need to provide an answer for both.

Option 1: The CoC actively encourages new and existing providers to apply for new projects through reallocation.

Attachment Required - Option 1: Documentation that shows the CoC actively encouraged new and existing providers to apply for new projects through reallocation.

Option 2: The CoC has cumulatively reallocated at least 20 percent of the CoC's ARD between FY 2013 and FY 2017 CoC Program Competitions.

No Attachment Required - HUD will calculate the cumulative amount based on the CoCs reallocation forms submitted with each fiscal years Priority Listing.

Reallocation: Option 1

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> Attachment Required - provide documentation that shows the CoC actively encouraged new and existing providers to apply for new projects through reallocation.

1E-5. If the CoC rejected or reduced project 09/07/2017 application(s), enter the date the CoC and Collaborative Applicant notified project applicants their project application(s) were being rejected or reduced in writing outside of e-snaps.

Attachment Required: Copies of the written notification to project applicant(s) that their project application(s) were rejected. Where a project application is being rejected or reduced, the CoC must indicate the reason(s) for the rejection or reduction.

1E-5a. Provide the date the CoC notified applicant(s) their application(s) were accepted and ranked on the Priority Listing, in writing, outside of e-snaps.

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Attachment Required: Copies of the written notification to project applicant(s) their project application(s) were accepted and ranked on the Priority listing.

Reallocation Supporting Documentation

Attachment Required - provide documentation that shows the CoC actively encouraged new and existing providers to apply for new projects through reallocation.

Document Type	Required?	Document Description	Date Attached
Reallocation Supporting Documentation	No	Request for proje	09/18/2017

Attachment Details

Document Description: Request for projects from CoC

2A. Homeless Management Information System (HMIS) Implementation

Intructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2A-1. Does the CoC have in place a Yes
Governance Charter or other written
documentation (e.g., MOU/MOA) that outlines
the roles and responsibilities of the CoC and
HMIS Lead?

Attachment Required: If "Yes" is selected, a copy of the sections of the Governance Charter, or MOU/MOA addressing the roles and responsibilities of the CoC and HMIS Lead.

2A-1a. Provide the page number(s) where the roles and responsibilities of the CoC and HMIS Lead can be found in the attached document(s) referenced in 2A-1. In addition, indicate if the page number applies to the Governance Charter or MOU/MOA.

Governance Charter p. 4, 23-24, MOU p. 1

- 2A-2. Does the CoC have a HMIS Policies and Yes Procedures Manual? Attachment Required: If the response was "Yes", attach a copy of the HMIS Policies and Procedures Manual.
- **2A-3. What is the name of the HMIS software** Mediware/Bowman Systems **vendor?**
- **2A-4. Using the drop-down boxes, select the** Single CoC **HMIS implementation Coverage area.**

2A-5. Per the 2017 HIC use the following chart to indicate the number of beds in the 2017 HIC and in HMIS for each project type within the CoC. If a particular project type does not exist in the CoC then enter "0" for all cells

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in that project type.

Project Type	Total Beds in 2017 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ESG) beds	145	64	68	83.95%
Safe Haven (SH) beds	3	0	0	0.00%
Transitional Housing (TH) beds	78	13	60	92.31%
Rapid Re-Housing (RRH) beds	20	20	0	0.00%
Permanent Supportive Housing (PSH) beds	131	5	39	30.95%
Other Permanent Housing (OPH) beds	0	0	0	

2A-5a. To receive partial credit, if the bed coverage rate is below 85 percent for any of the project types, the CoC must provide clear steps on how it intends to increase this percentage for each project type over the next 12 months. (limit 1000 characters)

A HMIS Lead was hired 5/15/17. Before that, staff at the City of Waco, CoC Lead, provided data management, but there was not 100% dedicated staff. The HMIS Lead identified work with the MHMR who contracts with Wood Group to provide Safe Haven services should be set up in HMIS for 3 safe haven beds. There are 13 shelter beds which are not mapping correctly to HMIS. Also, 27 PSH beds were erroneously left out of HMIS bed rate. This will be corrected in future reports. The 20 RRH beds are utilized for DV reported in a separate HUD approved data system. Additional RRH beds were funded beginning Aug. 2017. The remaining 60 PSH beds not counted in HMIS are HUD-VASH vouchers administered by the VA. An MOU has been signed between the VA and the CoC/HMIS Lead in order to share information. Local VA staff report discussion on the national level about an HMIS plan but no definite timeline and the local VA does not have permission to move forward with implementation of HMIS.

2A-6. Annual Housing Assessment Report 7 (AHAR) Submission: How many Annual Housing Assessment Report (AHAR) tables were accepted and used in the 2016 AHAR?

2A-7. Enter the date the CoC submitted the 05/01/2017 2017 Housing Inventory Count (HIC) data into the Homelessness Data Exchange (HDX). (mm/dd/yyyy)

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2B. Continuum of Care (CoC) Point-in-Time Count

Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2B-1. Indicate the date of the CoC's 2017 PIT 01/26/2017 count (mm/dd/yyyy). If the PIT count was conducted outside the last 10 days of January 2017, HUD will verify the CoC received a HUD-approved exception.

2B-2. Enter the date the CoC submitted the 05/01/2017 PIT count data in HDX. (mm/dd/yyyy)

2C. Continuum of Care (CoC) Point-in-Time (PIT) Count: Methodologies

Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2C-1. Describe any change in the CoC's sheltered PIT count implementation, including methodology and data quality changes from 2016 to 2017. Specifically, how those changes impacted the CoCs sheltered PIT count results. (limit 1000 characters)

not applicable

2C-2. Did your CoC change its provider No coverage in the 2017 sheltered count?

2C-2a. If "Yes" was selected in 2C-2, enter the change in provider coverage in the 2017 sheltered PIT count, including the number of beds added or removed due to the change.

Beds Added:	0
Beds Removed:	0
Total:	0

2C-3. Did your CoC add or remove emergency No shelter, transitional housing, or Safe-Haven inventory because of funding specific to a Presidentially declared disaster resulting in a change to the CoC's 2017 sheltered PIT count?

2C-3a. If "Yes" was selected in 2C-3, enter the number of beds that were added or removed in 2017 because of a Presidentially declared disaster.

Beds Added:	0
Beds Removed:	0
Total:	0

2C-4. Did the CoC change its unsheltered PIT Yes count implementation, including methodology and data quality changes from

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2016 to 2017?

CoCs that did not conduct an unsheltered count in 2016 or did not report unsheltered PIT count data to HUD in 2016 should compare their efforts in 2017 to their efforts in 2015.

2C-4a. Describe any change in the CoC's unsheltered PIT count implementation, including methodology and data quality changes from 2016 to 2017. Specify how those changes impacted the CoC's unsheltered PIT count results. See Detailed Instructions for more information. (limit 1000 characters)

As reported on the 2017 PIT, the CoC was able to improve on their PIT count training with more volunteers than years past. All team leads and most team members met six months prior to the 2017 PIT count for training and preparation of surveys. One month prior the PIT count, all leads and most team members met to finalize coordination.

2C-5. Did the CoC implement specific Yes measures to identify youth in their PIT count?

2C-5a. If "Yes" was selected in 2C-5, describe the specific measures the CoC; (1) took to identify homeless youth in the PIT count; (2) during the planning process, how stakeholders that serve homeless youth were engaged; (3) how homeless youth were engaged/involved; and (4) how the CoC worked with stakeholders to select locations where homeless youth are most likely to be identified. (limit 1000 characters)

Each year the Heart of Texas Homeless Coalition (HOTHC), along with the CoC and HMIS Leads begin meeting with a task force of individual stakeholders to plan our annual Project Homeless Connect event in conjunction with our Point-in-Time count. During planning, stakeholders identify specific sites where youth are found in our community. HOTHC was one of the first in the nation to use HMIS to collect aggregate date on homeless youth in the Waco ISD. This allowed our community a way to accurately calculate the number of McKinney-Vento Homeless students in the community. We use the HMIS/WISD data to calculate numbers of youth who meet the definition of unaccompanied youth. Besides the youth counted by Waco ISD during the PIT count, youth are also counted at Project Homeless Connect, Compassion Ministries Family Transitional Shelter, Sally's House Emergency Shelter for families, at agencies that serve meals, and in areas identified by local PATH outreach workers and local law enforcement.

2C-6. Describe any actions the CoC implemented in its 2017 PIT count to better count individuals and families experiencing chronic homelessness, families with children, and Veterans experiencing homelessness. (limit 1000 characters)

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In 2017, VA Grant and Per Diem Homeless Liaisons joined in the 2017 PIT count to assist in creation of the list of geographic locations where veterans have been known to congregate as well as identify homeless veterans. These Liaisons maintain the list of homeless veterans in the area and track individual veteran homelessness status monthly, so are very familiar with most of the veterans who are homeless. To better count families with children, the CoC collaborated with shelters known to serve homeless families and with Waco ISD homeless liaisons who maintain a list of families who are unsheltered and residing in hotels. The HOTRMHMR PATH Team provided assistance with ways to better count individuals and families experiencing chronic homelessness. Prior to the PIT, stakeholders met with local street outreach workers to conduct PIT planning meetings to determine ways to better locate and count individuals and families, including Veterans, who are experiencing homelessness.

3A. Continuum of Care (CoC) System Performance

Instructions

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

3A-1. Performance Measure: Reduction in the Number of First-Time Homeless. Describe: (1) the numerical change the CoC experienced; (2) the process the CoC used to identify risk factors of becoming homeless for the first time; (3) the strategies in place to address individuals and families at risk of becoming homeless; and (4) the organization or position that is responsible for overseeing the CoC's strategy to reduce or end the number of individuals and families experiencing homelessness for the first time.

(limit 1000 characters)

HOTHC had a reduction of 126 individuals experiencing homelessness for the first time. Practicing diversion at the entry points for the CE system, HOTHC utilizes the VI- SPDAT to identify risk factors in individuals and families. Per consolidated plan, CoC risk factors are the poverty rate in this area is 33.3% (much greater than the Texas rate of 21.1%) and affordable housing. The CoC Permanent Housing Task Force works on affordable housing. All CoC providers work with clients on employment. The Salvation Army prioritizes families and individuals who are at risk of homelessness who have a court ordered eviction notice. SA's TBRA program serves families and individuals who qualify under the McKinney-Vento Act and their TX Veterans Comm. program provides homeless prevention services. Family Endeavors provides homeless prevention services and RR to veterans and their families. The HMIS Lead provides data and the CoC Committee and CoC Lead monitor strategy effectiveness.

3A-2. Performance Measure: Length-of-Time Homeless. CoC 's must demonstrate how they reduce the length-of-time for individuals and families remaining homeless. Describe (1) the numerical change the CoC experienced; (2) the actions the CoC has implemented to reduce the length-of-time individuals and families remain homeless; (3) how the CoC identifies and houses individuals and families with the longest length-of-time homeless; and (4) identify the organization or position that is responsible for overseeing the CoC's strategy to reduce the length-of-time individuals and families remain homeless. (limit 1000 characters)

The average length-of-time homeless for persons in ES, SH, and TH has increased to 4 nights. The CoC Committee has taken several planning steps to reduce the average length of homelessness by creating a priority for housing for those with the longest time spent homeless in the Coordinated Entry system.

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The VI-SPDAT has an element of acuity based on length of homelessness and the Housing Navigator, hired July 10th, will prioritize based on the waiting list and length of time homeless. The Navigator and Permanent Supportive Housing Task Force work to decrease barriers to housing in the local community. The CoC is working with agencies to develop low-barrier housing and all grantees currently use a Housing First Approach. Local emergency shelters have agreed to quickly engage participants with caseworkers. The HMIS Lead provides data and the CoC Committee and CoC Lead monitor strategy effectiveness.

3A-3. Performance Measures: Successful Permanent Housing Placement and Retention

Describe: (1) the numerical change the CoC experienced; (2) the CoCs strategy to increase the rate of which individuals and families move to permanent housing destination or retain permanent housing; and (3) the organization or position responsible for overseeing the CoC's strategy for retention of, or placement in permanent housing. (limit 1000 characters)

HOTHC had an increase of 1% of persons in ES, SH, TH, and PH-RRH who exited to permanent housing, and a decrease by 2% of persons in all PH projects except PH-RRH who remained in applicable PH projects and those who exited to permanent housing destinations. The CoC has implemented CE and Housing Navigator programs to improve the rate of individuals and families who move to permanent housing. Through the Housing Navigator and the Permanent Housing Task Force, the CoC is working to improve options in the community by educating landlords and implementing goals to reduce barriers. Individuals and families receive case management and supportive services from the agency who serves them, in order to develop goals to have a positive outcome when exiting programs. Family Abuse Center, HOT Region MHMR, and The Salvation Army, work towards the CoC goal of retention of, or placement in permanent housing. The HMIS Lead provides data and the CoC Committee and CoC Lead monitor strategy effectiveness.

3A-4. Performance Measure: Returns to Homelessness.

Describe: (1) the numerical change the CoC experienced, (2) what strategies the CoC implemented to identify individuals and families who return to homelessness, (3) the strategies the CoC will use to reduce additional returns to homelessness, and (4) the organization or position responsible for overseeing the CoC's efforts to reduce the rate of individuals and families' returns to homelessness. (limit 1000 characters)

There was a decrease in overall returns to homelessness from 35% in 2015 to 25% in 2016. This has been accomplished by prioritizing individuals with a history of homelessness and determining the best combination of CoC resources to help individuals retain permanent housing. In the next 12 months, improvements to Coordinated Entry are expected and SSO-Coordinated Access/Housing Navigator applications will provide the links needed to engage Landlords, developers and management companies to adapt procedures to provide support and direction. Use of System Performance Measures allows our CoC Committee and CoC Lead to monitor performance and allows our CoC to

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analyze data that identify gaps and need. The CoC's decision to reallocate funds of lower preforming projects aids in bridging those gaps.

3A-5. Performance Measures: Job and Income Growth
Describe: (1) the strategies that have been implemented to increase
access to employment and mainstream benefits; (2) how the CoC
program-funded projects have been assisted to implement the strategies;
(3) how the CoC is working with mainstream employment organizations to
help individuals and families increase their cash income; and (4) the
organization or position that is responsible for overseeing the CoC's
strategy to increase job and income growth from employment, nonemployment including mainstream benefits.
(limit 1000 characters)

Strategies implemented by CoC projects to increase employment related income: Mission Waco created programs targeting low income adults and homeless youth age 16-24 for job training. Communities in Schools implemented Work Force Solutions employment and paid work experience program for 16-24 year olds. HOT MHMR Center provides supported employment services. All CoC programs utilize TX Workforce Commission and TX Dept. of Assistive and Rehabilitative Employment Services as well as participate in the Community Partner Program. In this initiative, those receiving services from CoC projects are enrolled in all benefit programs for which they qualify. Caritas introduced WERN to increase training and employment opportunities to clients served. Agencies utilized SOAR-trained staff to connect individuals to mainstream benefits. The CoC Committee and CoC Lead monitors project performance. This area is scored during grant application evaluation and effects project ranking and funding.

3A-6. Did the CoC completely exclude a geographic area from the most recent PIT count (i.e. no one counted there, and for communities using samples in the area that was excluded from both the sample and extrapolation) where the CoC determined there were no unsheltered homeless people, including areas that are uninhabitable (deserts, forests).

3A.6a. If the response to 3A-6 was "Yes", what was the criteria and decision-making process the CoC used to identify and exclude specific geographic areas from the CoCs unsheltered PIT count? (limit 1000 characters)

not applicable

3A-7. Enter the date the CoC submitted the 06/04/2017 System Performance Measures data in HDX, which included the data quality section for FY 2016.

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(mm/dd/yyyy)

3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Instructions

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

3B-1. Compare the total number of PSH beds, CoC program and non CoCprogram funded, that were identified as dedicated for yes by chronically homeless persons in the 2017 HIC, as compared to those identified in the 2016 HIC.

	2016	2017	Difference
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homelessness persons identified on the HIC.	44	10	-34

3B-1.1. In the box below: (1) "total number of Dedicated PLUS Beds" provide the total number of beds in the Project Allocation(s) that are designated ad Dedicated PLUS beds; and (2) in the box below "total number of beds dedicated to the chronically homeless:, provide the total number of beds in the Project Application(s) that are designated for the chronically homeless. This does not include those that were identified in (1) above as Dedicated PLUS Beds.

Total number of beds dedicated as Dedicated Plus	47
Total number of beds dedicated to individuals and families experiencing chronic homelessness	8
Total	55

3B-1.2. Did the CoC adopt the Orders of Priority into their standards for all CoC Program funded PSH projects as described in Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing.

3B-2.1. Using the following chart, check each box to indicate the factor(s) the CoC currently uses to prioritize households with children based on need during the FY 2017 Fiscal Year.

History of or Vulnerability to Victimization	X
Number of previous homeless episodes	X

	•	
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Unsheltered homelessness	X
Criminal History	X
Bad credit or rental history (including not having been a leaseholder)	X
Head of Household with Mental/Physical Disability	X

3B-2.2. Describe: (1) the CoCs current strategy and timeframe for rapidly rehousing every household of families with children within 30 days of becoming homeless; and (2) the organization or position responsible for overseeing the CoC's strategy to rapidly rehouse families with children within 30 days of becoming homeless. (limit 1000 characters)

Coordinated entry process implemented by the HOTHC utilizes the VI-SPDAT which allows for families seeking assistance to be matched with the most appropriate housing intervention for their needs and helps to reduce the instances of homelessness through prevention and diversion activities administered at the beginning of the process. Two agencies have changed TH programs to RRH to increase beds available for homeless families since 2013. Sanctuary House, a collaboration using non-HUD funding has been developed involving Salvation Army, Waco ISD, Waco Housing Authority, and the City of Waco to rapidly re-house families who fit the McKinney-Vento definitions. The CoC and ISD homeless liaisons oversee the CoC's strategy and meets at the annual state homeless conference to evaluate the effectiveness of current strategies and develop new strategies. Waco ISD ensures families are housed within 30 days and provides hotel vouchers to these families while permanent housing is obtained.

3B-2.3. Compare the number of RRH units available to serve families from the 2016 and 2017 HIC.

	2016	2017	Difference
Number of CoC Program and non-CoC Program funded PSH units dedicated for use by chronically homelessness persons identified on the HIC.	0	8	8

3B-2.4. Describe the actions the CoC is taking to ensure emergency shelters, transitional housing, and permanent supportive housing (PSH and RRH) providers within the CoC adhere to anti-discrimination policies by not denying admission to, or separating any family members from other members of their family or caregivers based on age, sex, gender, LGBT status, marital status or disability when entering a shelter or Housing.

(limit 1000 characters)

HOTHC worked with all CoC funded agencies to ensure they had an up-to-date anti-discrimination policy in place that aligns with the Equal Access Rule. The CoC prioritizes maintaining a family unit and has policies and procedures that prohibit involuntary family separation. McKinney Vento families are part of the

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Sanctuary House collaboration, which is designed to keep families intact. HOTHC conducted multiple trainings in March 2017, to educate agencies about the Equal Access Rule. Agencies are required to keep a denial log of rejected referrals and provide this log quarterly to the CoC Committee for review to ensure denials are not based on discriminatory practices.

3B-2.5. From the list below, select each of the following the CoC has strategies to address the unique needs of unaccompanied homeless youth.

Human trafficking and other forms of exploitation?	Yes
LGBT youth homelessness?	Yes
Exits from foster care into homelessness?	Yes
Family reunification and community engagement?	Yes
Positive Youth Development, Trauma Informed Care, and the use of Risk and Protective Factors in assessing youth housing and service needs?	Yes

3B-2.6. From the list below, select each of the following the CoC has a strategy for prioritization of unaccompanied youth based on need.

History or Vulnerability to Victimization (e.g., domestic violence, sexual assault, childhood abuse)	X
Number of Previous Homeless Episodes	X
Unsheltered Homelessness	X
Criminal History	X
Bad Credit or Rental History	X

3B-2.7. Describe: (1) the strategies used by the CoC, including securing additional funding to increase the availability of housing and services for youth experiencing homelessness, especially those experiencing unsheltered homelessness; (2) provide evidence the strategies that have been implemented are effective at ending youth homelessness; (3) the measure(s) the CoC is using to calculate the effectiveness of the strategies; and (4) why the CoC believes the measure(s) used is an appropriate way to determine the effectiveness of the CoC's efforts. (limit 1500 characters)

Using HMIS in Waco ISD, 285 students from 9-12th grade were identified as meeting the McKinney-Vento definition for homelessness and 90 of those were identified as unaccompanied. This led to the development of The Cove, who provides an after school nurturing center for unaccompanied youth and links them to services such as housing, youth shelter, diversion practices, and family unification when possible. A survey was conducted to explore the feasibility of using a Host Home Model in our community, and Baylor University awarded The Cove a grant to research this possibility. Waco ISD has partnered with The Cove to provide seat time to "catch up" on credits needed to graduate.

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Methodist Children's Home is working in collaboration with The Cove, to be a bridge of housing for unaccompanied homeless youth while finishing high school, college, or work training. Waco ISD, Waco Housing Authority, Salvation Army, and the City of Waco secured 3 public housing units using ISD homeless liaisons as the point of entry to identify and secure housing and support services for families experiencing homelessness. During our last CoC competition, our local MHMR was awarded housing that was designated for youth. Our CoC uses measures such as graduating from high school, receiving training for employment, entering/reentering the criminal justice system, and working towards post-secondary education to determine effectiveness of programs geared towards preventing and ending youth homelessness.

3B-2.8. Describe: (1) How the CoC collaborates with youth education providers, including McKinney-Vento local educational authorities and school districts; (2) the formal partnerships the CoC has with these entities; and (3) the policies and procedures, if any, that have been adopted to inform individuals and families who become homeless of their eligibility for educational services. (limit 1000 characters)

The Waco ISD has an MOU with HMIS and participates on the CoC Committee, Coordinated Entry, and HOTHC member meetings. The City of Waco is a participant of the Prosper Waco Initiative; the local collective impact initiative with the goals of improving the education, health, and financial security of Waco. During intake at agencies, applicants with children are provided with the name/phone number of the ISD Homeless Liaison for their district. The Homeless Liaisons can provide a variety of services including facilitating enrollment, transportation, schools supplies, meal programs, mentoring/tutoring programs. The Homeless Liaisons participate in CoC planning and collaborate with agencies to develop programs that meet the needs of homeless children. Additionally, the Liaisons work with the area youth shelter, local law enforcement and PATH teams when unaccompanied homeless youth are identified. CoC Lead and WISD Liaison attend training & collaborative meetings at THN Conference annually.

3B-2.9. Does the CoC have any written formal agreements, MOU/MOAs or partnerships with one or more providers of early childhood services and supports? Select "Yes" or "No".

	MOU/MOA	Other Formal Agreement
Early Childhood Providers	No	No
Head Start	No	No
Early Head Start	No	No
Child Care and Development Fund	No	No
Federal Home Visiting Program	No	No
Healthy Start	No	No
Public Pre-K	No	No
Birth to 3	No	No
Tribal Home Visting Program	No	No
Other: (limit 50 characters)		

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HOPES at Family Abuse Center	Yes	

3B-3.1. Provide the actions the CoC has taken to identify, assess, and refer homeless Veterans who are eligible for Veterans Affairs services and housing to appropriate resources such as HUD-VASH and Supportive Services for Veterans Families (SSVF) program and Grant and Per Diem (GPD).

(limit 1000 characters)

The CoC has implemented several strategies to ensure that Veterans who are eligible for VA services are identified, assessed, and referred to appropriate resources. The primary partner in this effort is the Central Texas Veterans Health Care system. VA social workers and outreach staff work diligently to connect veterans who are homeless or at risk of homelessness to HUD-VASH, SSVF, and the Vet Per Diem program as well as other VA eligible services offered through the VA. Eligible veterans are also referred to the Texas Veterans Commission program through the Salvation Army which provides security deposits for veterans receiving VASH vouchers. PATH and VA staff provide street outreach weekly and VA staff maintain a list of homeless veterans with monthly status updates on each homeless veteran. Coordinated Entry also aids in identification, assessment, and of vet referral to appropriate resources.

3B-3.2. Does the CoC use an active list or by Yes name list to identify all Veterans experiencing homelessness in the CoC?

3B-3.3. Is the CoC actively working with the Yes VA and VA-funded programs to achieve the benchmarks and criteria for ending Veteran homelessness?

3B-3.4. Does the CoC have sufficient Yes resources to ensure each Veteran is assisted to quickly move into permanent housing using a Housing First approach?

4A. Continuum of Care (CoC) Accessing Mainstream Benefits and Additional Policies

Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

4A-1. Select from the drop-down (1) each type of healthcare organization the CoC assists program participants with enrolling in health insurance, and (2) if the CoC provides assistance with the effective utilization of Medicaid and other benefits.

Type of Health Care	Yes/No	Assist with Utilization of Benefits?
Public Health Care Benefits (State or Federal benefits, e.g. Medicaid, Indian Health Services)	Yes	Yes
Private Insurers:	Yes	Yes
Non-Profit, Philanthropic:	Yes	Yes
Other: (limit 50 characters)		•

4A-1a. Mainstream Benefits

CoC program funded projects must be able to demonstrate they supplement CoC Program funds from other public and private resources, including: (1) how the CoC works with mainstream programs that assist homeless program participants in applying for and receiving mainstream benefits; (2) how the CoC systematically keeps program staff up-to-date regarding mainstream resources available for homeless program participants (e.g. Food Stamps, SSI, TANF, substance abuse programs); and (3) identify the organization or position that is responsible for overseeing the CoCs strategy for mainstream benefits. (limit 1000 characters)

Local participating agencies utilize SOAR-trained staff to connect clients to mainstream benefits as well as provide case management services to assist clients in accessing resources. The CoC Lead collaborates with local agencies to conduct Project Homeless Connect, which connects local homeless to mainstream benefit providers. Mission Waco houses a free clinic in partnership with the local Family Health Services. HOTHC has established relationships with local hospitals which connects local homeless with identified providers who assist in obtaining mainstream benefits and housing. The City of Waco has adopted a collective impact model to substantially reduce poverty. The CoC is working with Prosper Waco on 3 areas of focus: Healthcare, Education, and Financial growth. One of the goals of the Prosper Waco Healthcare initiative is to facilitate health insurance enrollment for the community. The HMIS Lead

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provides data and the CoC Committee and CoC Lead monitor strategy effectiveness.

4A-2. Low Barrier: Based on the CoCs FY 2017 new and renewal project applications, what percentage of Permanent Housing (PSH) and Rapid Rehousing (RRH), Transitional Housing (TH), Safe-Haven, and SSO (Supportive Services Only-non-coordinated entry) projects in the CoC are low-barrier?

Total number of PH (PSH and RRH), TH, Safe-Haven and non-Coordinated Entry SSO project applications in the FY 2017 competition (new and renewal)	9.00
Total number of PH (PSH and RRH), TH, Safe-Haven and non-Coordinated Entry SSO renewal and new project applications that selected "low barrier" in the FY 2017 competition.	9.00
Percentage of PH (PSH and RRH), TH, Safe-Haven and non-Coordinated Entry SSO renewal and new project applications in the FY 2017 competition that will be designated as "low barrier"	100.00%

4A-3. Housing First: What percentage of CoC Program Funded PSH, RRH, SSO (non-coordinated entry), safe-haven and Transitional Housing; FY 2017 projects have adopted the Housing First approach, meaning that the project quickly houses clients without preconditions or service participation requirements?

Total number of PSH, RRH, non-Coordinated Entry SSO, Safe Haven and TH project applications in the FY 2017 competition (new and renewal).	9.00
Total number of PSH, RRH, non-Coordinated Entry SSO, Safe Haven and TH renewal and new project applications that selected Housing First in the FY 2017 competition.	9.00
Percentage of PSH, RRH, non-Coordinated Entry SSO, Safe Haven and TH renewal and new project applications in the FY 2017 competition that will be designated as Housing First.	100.00%

4A-4. Street Outreach: Describe (1) the CoC's outreach and if it covers 100 percent of the CoC's geographic area; (2) how often street outreach is conducted; and (3) how the CoC has tailored its street outreach to those that are least likely to request assistance. (limit 1000 characters)

HOTHC conducts direct outreach and marketing in the community through the use of phone services like 211 and community agencies that provide street outreach within the entirety of the CoC region. Marketing is in languages commonly spoken in the community. HOTHC makes use of physical and virtual locations accessible to those with disabilities. Street outreach is conducted weekly by agencies such as the Heart of Texas Region MHMR PATH Team, Family Endeavors, Caritas, and the HCHV Outreach workers out of the local VA Medical Center. HOTHC has two Coordinated Entry access points that are accessible to those with transportation issues, cognitive and physical disabilities, and those lacking phone or internet access.

4A-5. Affirmative Outreach

Specific strategies the CoC has implemented that furthers fair housing as detailed in 24 CFR 578.93(c) used to market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, gender identify, sexual orientation, age, familial status, or disability; who are least likely to apply in the absence of special outreach.

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Describe: (1) the specific strategies that have been implemented that affirmatively further fair housing as detailed in 24 CFR 578.93(c); and (2) what measures have been taken to provide effective communication to persons with disabilities and those with limited English proficiency. (limit 1000 characters)

HOTHC conducted training with agencies to educate on the Equal Access Rule. Agencies submitted revisions to policies regarding their fair housing practices and how they affirmatively market their housing and services to eligible persons regardless of race, color, national origin, religion, sex, age, gender identity, sexual orientation, familial status, or disability. Agencies have developed policies and procedures to provide effective communication to persons with disabilities and those with limited English proficiency. Marketing and services are available in languages commonly spoken in the community. Also, agencies are required to submit a denial log quarterly to the CoC Committee for review which helps ensure equity of service availability.

4A-6. Compare the number of RRH beds available to serve populations from the 2016 and 2017 HIC.

	2016	2017	Difference
RRH beds available to serve all populations in the HIC	0	20	20

4A-7. Are new proposed project applications No requesting \$200,000 or more in funding for housing rehabilitation or new construction?

4A-8. Is the CoC requesting to designate one or more SSO or TH projects to serve homeless households with children and youth defined as homeless under other Federal statues who are unstably housed (paragraph 3 of the definition of homeless found at 24 CFR 578.3).

4B. Attachments

Instructions:

Multiple files may be attached as a single .zip file. For instructions on how to use .zip files, a reference document is available on the e-snaps training site: https://www.hudexchange.info/resource/3118/creating-a-zip-file-and-capturing-a-screenshot-resource

Document Type	Required?	Document Description	Date Attached
01. 2016 CoC Consolidated Application: Evidence of the CoC's communication to rejected participants	Yes	Response Letter t	09/25/2017
02. 2016 CoC Consolidated Application: Public Posting Evidence	Yes		
03. CoC Rating and Review Procedure (e.g. RFP)	Yes	2017 CoC Rating a	09/12/2017
04. CoC's Rating and Review Procedure: Public Posting Evidence	Yes	Public Posting of	09/18/2017
05. CoCs Process for Reallocating	Yes	2017 CoCs Process	09/12/2017
06. CoC's Governance Charter	Yes	TX-604 Governance	09/18/2017
07. HMIS Policy and Procedures Manual	Yes	HMIS Policies	09/25/2017
08. Applicable Sections of Con Plan to Serving Persons Defined as Homeless Under Other Fed Statutes	No		
09. PHA Administration Plan (Applicable Section(s) Only)	Yes	2017 PHA Letter f	09/12/2017
10. CoC-HMIS MOU (if referenced in the CoC's Goverance Charter)	No	CoC-HMIS MOU	09/12/2017
11. CoC Written Standards for Order of Priority	No	Order of Priority	09/19/2017
12. Project List to Serve Persons Defined as Homeless under Other Federal Statutes (if applicable)	No		
13. HDX-system Performance Measures	Yes	2017 HDX Competit	09/12/2017
14. Other	No	2017 Accepted Pro	09/12/2017
15. Other	No		

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Attachment Details

Document Description: Response Letter to Salvation Army

Attachment Details

Document Description:

Attachment Details

Document Description: 2017 CoC Rating and Review Procedures

Attachment Details

Document Description: Public Posting of Ranking Procedures

Attachment Details

Document Description: 2017 CoCs Process for Reallocating

Attachment Details

Document Description: TX-604 Governance Charter

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Attachment Details

Document Description: HMIS Policies

Attachment Details

Document Description:

Attachment Details

Document Description: 2017 PHA Letter for Waco Housing Authority

Attachment Details

Document Description: CoC-HMIS MOU

Attachment Details

Document Description: Order of Priority p. 21-23

Attachment Details

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Document Description:

Attachment Details

Document Description: 2017 HDX Competition Report

Attachment Details

Document Description: 2017 Accepted Project Written Notification of

Rank

Attachment Details

Document Description:

Submission Summary

Ensure that the Project Priority List is complete prior to submitting.

Page	Last Updated
1A. Identification	08/23/2017
1B. Engagement	09/25/2017
1C. Coordination	09/25/2017
1D. Discharge Planning	09/08/2017
1E. Project Review	09/20/2017
1F. Reallocation Supporting Documentation	09/18/2017
2A. HMIS Implementation	09/26/2017
2B. PIT Count	09/26/2017
2C. Sheltered Data - Methods	09/26/2017
3A. System Performance	09/25/2017
3B. Performance and Strategic Planning	09/26/2017

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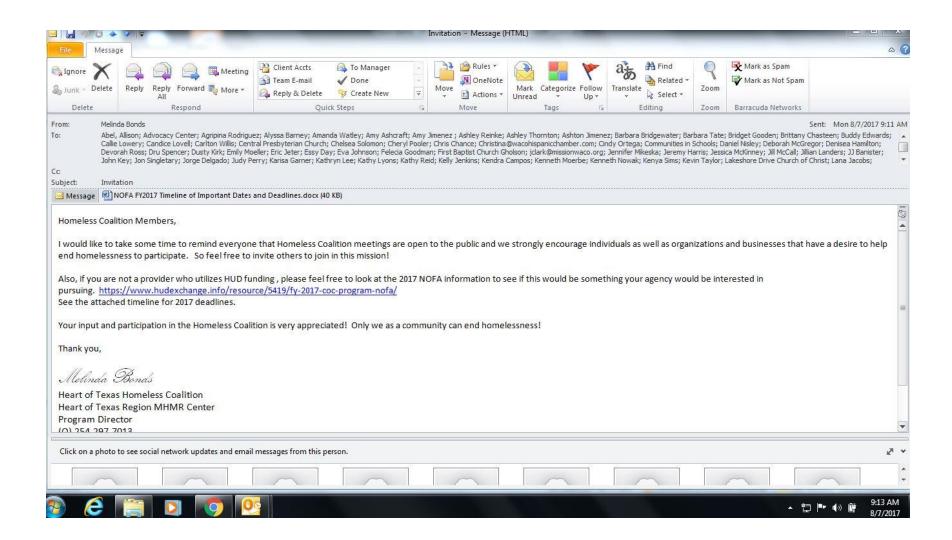
09/26/2017

4A. Mainstream Benefits and Additional

Policies

4B. Attachments Please Complete

Submission Summary No Input Required





Heart of Texas Homeless Coalition P. O. Box 23025 Waco, TX 76702

September 6, 2017

Major Caldwell The Salvation Army of Waco 4721 W. Waco Dr. Waco, TX 76710

Dear Major Caldwell,

I am writing to officially inform you of the outcome of the Scoring and Ranking Committee evaluation of the project applications your agency submitted to The Heart of Texas Homeless Coalition. On September 5, 2017, the following projects were accepted to receive the following recommended funding amount in the 2017 Continuum of Care NOFA competition:

- 1. Salvation Army Rapid Re-Housing Project ranked 7th and the amount of funding recommended is \$73,997. Based on the project's score, points were lost in the areas of meeting HUD priorities; average daily unit utilization; percent of participants who gained or increased earned and other income from entry to exit; percent of participants with earned or other income; leavers who exited to shelter, streets, or unknown; targeting hard to serve; timely spending of funding; and HMIS data completeness. The Scoring and Ranking Committee discussed the vital role that these services play in our CoC and community, and our need to continue these services, so they utilized a reallocation formula to determine funding recommendations based on previous expenditures. The Scoring and Ranking Committee requests that The Salvation Army submit in its project application and to the Heart of Texas Homeless Coalition a project improvement plan to specify how the project will improve performance and meet standards in the upcoming year. The purpose of this project improvement plan is to hopefully reduce recapture of additional funds by HUD due to poor funds expenditure and project performance. I will re-open your project application for Margie to edit the submission (budget and project improvement plan).
- 2. Salvation Army Rapid Re-Housing Expansion Project ranked 10th and the amount of funding recommended is \$16,684.
- 3. Salvation Army Coordinated Entry Project ranked 12th and the amount of funding recommended is \$43,590.

Please be aware that you have the ability to appeal the CoC's decision to reduce your funding. The process for doing this is outlined in the Heart of Texas Homeless Coalition Grievance Policies and Procedures found at http://www.heartoftexashomeless.org/?page_id=841 and in the NOFA. Please do not hesitate to contact me if you have any questions and thank you for your submissions to this year's competition.

Sincerely,

Nicole Wiscombe CoC Administrator

Heart of Texas Homeless Coalition 2017 Renewal CoC Project Evaluation

This tool will be used to review, score, and rank all renewal CoC projects as part of the 2017 CoC Competition. The priorities that will be reviewed are those listed by HUD in the FY 2017 NOFA, and include:

- 1. Ending homelessness for all persons.
- 2. Creating a systemic response to homelessness.
- 3. Strategically allocating and using resources.
- 4. Using a Housing First approach.

Renewal Project Evaluation

The CoC Scoring and Ranking Committee and the CoC/HMIS Leads will complete a Renewal Project Evaluation Tool for each renewing CoC project. Projects failing to submit required information for a priority area will receive zero points for that priority area. After completing all Renewal Project Evaluation Tools, the CoC Scoring and Ranking Committee will rank all renewal projects according to their evaluation score — projects scoring highest are ranked best, those scoring lowest are ranked at the bottom.

Data Sources

While some data will be collected from narratives such as the project description, the majority of the data used in project evaluation comes from projects' designated Annual Performance Reports (APRs) for this competition. The Scoring and Ranking Committee will also consider Point-In-Time (PIT) Count data and Housing Inventory Count (HIC) data submission. Some information is obtained directly from providers or from SAGE HIMIS. Data from these sources is verified by HUD whenever possible:

- HUD audit/monitoring findings documentation;
- Information on timely draws and unspent funds from each applicant's Line of Credit Control System (LOCCS)
 accounts;
- Information on project matching funds; and
- Information collected by HUD field offices as shown through SAGE HMIS, including total LOCCS draw amounts.

Renewal Project Ranking and Funding Recommendations

The CoC Lead Agency for the Heart of Texas Homeless Coalition accepts all qualifying applications. Qualifying projects are then submitted to the CoC Scoring and Ranking Committee for ranking recommendations and final approval for the CoC Competition Priority Listing.

Reallocation Process and Procedure

The CoC Board understands and acknowledges that through the reallocation process very valuable projects may be defunded. The CoC Board is striving to develop a reallocation process that will ensure that projects submitted in the CoC Consolidated Application best align with the HUD CoC funding mechanism's priorities and contribute to a competitive application that collaboratively secures these dollars to improve our community. The CoC Board seeks to make data-driven decisions based on information gathered from the assessment tool and other HUD recommended data tools. This does not mean that the CoC Board does not value reallocated projects or the diversity of programs in our community. Rather, the CoC Board anticipates that most reallocated projects will see funders with priorities better suited to cultivate the unique contributions these projects make to our community that HUD's CoC funding mechanism is not designed to recognize.

HUD Priority List

If the box is filled in, the organization is given credit for this priority. If blank, no credit is given.

	Ending homelessness for all persons.
	 Should identify, engage, and effectively serve all persons experiencing homelessness. Should measure their performance based on local data that take into account the challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, or those experiencing chronic homelessness). Should have a comprehensive outreach strategy in place to identify and continuously engage all unsheltered individuals and families. Should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.
П	Creating a systemic response to homelessness.
•	 Should be using system performance measures such as the average length of homeless episodes, rates of return to homelessness, and rates of exit to permanent housing destinations to determine how effectively they are serving people experiencing homelessness. Should be using their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing and services to ensure people experiencing homelessness receive assistance quickly, and make homelessness assistance open, inclusive, and transparent.
	Strategically allocating and using resources.
	 Using cost, performance, and outcome data, projects should improve how resources are utilized to end homelessness. Should review project quality, performance, and cost effectiveness. Should maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness.
	Use a Housing First approach.
	 Housing First prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions. CoC Program funded projects should help individuals and families move quickly into permanent housing, and should measure and reduce the length of time people experience homelessness. Should engage landlords and property owners, remove barriers to entry, and adopt client-centered service methods.

	2017 NOFA I	Renewal Scorii	ng Rub	ric
Agency				
Project				
Date				
Category	Scoring Element		Points	Source of Criteria
HUD Priori	ties 1. Meets HUD Priorties			HUD Priorities
	All 4 Priorities	= 10 Points	1	Worksheet; Priorities
	3 of 4 Priorities	=7.5 Points		found on page 9 of the
	2 of 4 Priorities	=5 Points		NOFA
	1 or less Priorities	=0 Points		
APR	2. Occupancy/Average Daily U	nit Utilization	100000000000000000000000000000000000000	Q11 of APR; if applicants
	90%	=10 Points		are not funded based on
	70-90%	=7.5 Points		Units, the default will be
	50-70%	=5 Points		Bed Utilization Rate
	<50%	=0 Points		
	3a. PSH Programs: percent of programs increased or maintained earned exit	ed income from entry to		Q24b2 1st Row of APR
	20%	=10 Points		
	15-19%	=7.5 Points		
	10-14%	=5 Points	1	
	<10%	=0 Points	1	
	3b. RRH Programs: percent of increased or maintained earne exit	•		Q24b2 1st Row of APR
	50%	=10 Points	1	
	40-49%	=7.5 Points		
	25-39%	=5 Points]	
	<24%	=0 Points	1	
	3c. TH Programs: percent of pa or maintained earned income	•		Q24b2 1st Row of APR
	50%	=10 Points	1	
	40-49%	=7.5 Points	1	
	25-39%	=5 Points	1	
	<24%	=0 Points		1

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Category	Scoring Element	Po	ints Source of Criteria
APR	4a. PSH Programs: percent of programs increased or maintained other income from entry to exit		Q24b2 3rd Row of APR
	30%	=10 Points	
	24-29%	=7.5 Points	
	23-20%	=5 Points	
	<19%	=0 Points	
	4b. RRH Programs: percent of increased or maintained other income from entry to exit	the control of the co	Q24b2 3rd Row of APR
	50%	=10 Points	
	40-49%	=7.5 Points	
	25-39%	=5 Points	
	<24%	=0 Points	
	4c. TH Programs: percent of pa or maintained other (non-emp entry to exit	がんめい かんきょうしゃ とうしき ひかん そんがん しゃしょ コレー・コール しゅうきょ	Q24b2 3rd Row of APR
	50%	=10 Points	
	40-49%	=7.5 Points	
	25-39%	=5 Points	
	<24%	=0 Points	
	5a. PSH Programs: percent of p income	articipants with earned	Q24b3 1st Row of APR
	20%	=10 Points	
	15-19%	=7.5 Points	
	10-14%	=5 Points	
	<10%	=0 Points	
	5b. RRH Programs: percent of pincome	participants with earned	Q24b3 1st Row of APR
	50%	=10 Points	
	40-49%	=7.5 Points	
	25-39%	=5 Points	
	<24%	=0 Points	
	5c. TH Programs: percent of pa income	rticipants with earned	Q24b3 1st Row of APR
	50%	=10 Points	
	40-49%	=7.5 Points	
	25-39%	=5 Points	
	<24%	=0 Points	

Category	Scoring Element		Points	Source of Criteria
APR	6a. PSH Programs: percent of	participants with income		Q24b3 3rd Row of APR
	other than employment			
	50%	=10 Points		
	40-49%	=7.5 Points		
	25-39%	=5 Points		
	<24%	=0 Points		
	6b. RRH Programs: percent of other than employment	participants with income		Q24b3 3rd Row of APR
	30%	=10 Points		
	24-29%	=7.5 Points		
	23-20%	=5 Points		
	<19%	=0 Points		
	6c. TH Programs: percent of pa other than employment	rticipants with income		Q24b3 3rd Row of APR
	30%	=10 Points		
	24-29%	=7.5 Points		
•	23-20%	=5 Points		
	<19%	=0 Points		
	7a. PSH: percent of participant exited to permanent housing			Q29a1 of APR; (Subtotal of Permanent
	80%	=10 Points		destinations)/ (total
<u> </u>	75-79%	=7.5 Points		number of Leavers-
	70-74%	=5 Points		Deceased) from APR
	<69%	=0 Points		
	7b. RRH: percent of participant permanent housing	s who exited to		Q29a1 of APR; (Subtotal of Permanent
	80%	=10 Points		destinations)/ (total
	75-79%	=7.5 Points		number of Leavers-
	70-74%	=5 Points		Deceased) from APR
	<69%	=0 Points		
	7c. TH: percent of participants permanent housing	who exited to		Q29a1 of APR; (Subtotal of Permanent
	80%	=10 Points		destinations)/ (total
	75-79%	=7.5 Points		number of Leavers-
	70-74%	=5 Points		Deceased) from APR
	<69%	=0 Points		
	8. Leavers who exited to shelte	r, streets, or unknown		Q29 of APR
	<10%	=10 Points		
	11-15%	=7.5 Points		
	16-20%	=5 Points		
	>20%	=0 Points		

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Category	Scoring Element		Points	Source of Criteria
Targeting	9a. PSH percent of entries from literal ho	melessness		Q20a1 of APR
Hard to Serve	80%	=10 Points		
	75-79%	=7.5 Points	1	
	70-74%	=5 Points		
	<69%	=0 Points		
	9b. RRH percent of entries from literal homelessness		1	Q20a1 of APR
	80%	=10 Points		
	75-79%	=7.5 Points	1	
	70-74%	=5 Points]	
	<69%	=0 Points		
	9c. TH percent of entries from literal hom	elessness		Q20a1 of APR
	80%	=10 Points		
	75-79%	=7.5 Points		
	70-74%	=5 Points		
	<69%	=0 Points		, in the second
	10a. PSH participant entries with no inco	ne		Q24b3 row 5 of APR
	>45%	=10 Points		
	40-44%	=7.5 Points		
	35-39%	=5 Points		
	<34%	=0 Points		
	10b. RRH participant entries with no income			Q24b3 row 5 of APR
	>45%	=10 Points		
	40-44%	=7.5 Points		
	35-39%	=5 Points		
	<34%	=0 Points		
	10c. TH participant entries with no incom	e		Q24b3 row 5 of APR
	>45%	=10 Points		
	40-44%	=7.5 Points		
	35-39%	=5 Points		
	<34%	=0 Points		
inancial	11. Audit Review			Audit submited by
	Audit shows agency as a low risk auditee			Applicant
	AND no findings	=10 Points		
	Audit shows agency as a low risk auditee			
	OR agency has no findings	=5 Points		
	Audit shows agency at high risk AND			
	findings	=0 Points		
	12. LOCCS - Total Expenditures (timely sp	ending)	va de la escapió	Q31a4 of APR;
	>80%	=10 Points		Expenditures Total/
	<79%	=0 Points		Awarded Amount

Category	Scoring Element		Points	Source of Criteria
Coordinated	13. Participation in Coordinated Entry Plan	nning and		
Access	Implementation			
	Yes	=10 Points	1	
	No	=0 Points		
HMIS	14. HMIS Site Visit	STATE OF STATE		Site Visit Score Sheet;
Monitoring &	11-12	=10 Points		(DV Exception as they do
Data Quality	8-10	=5 Points		not use HMIS)
	<8 p. 10 10 FT 10	=0 Points		
	15. HMIS Data Completeness	15. HMIS Data Completeness		Program Report Card; fo
	>90%	=10 Points	1	DV use Q7DV of APR
	70-90%	=5 Points	1	
	<70%	=0 Points	1	
	16. HMIS Data Completeness			Program Report Card; for
	>98% accuracy	=10 Points		DV use Q7DV of APR
	<98% accuracy	=0 Points		
	17. PIT and HIC data submitted on time			PIT & HIC Submissions
	Yes	=10 Points	1	Screenshot
	No	=0 Points	1	
СоС	18. PIT/HIC Involvement			Pit Project Manager Sign
Participation	Involved in BOTH PIT and HIC	=10 Points		Up
	Involved in one	=5 Points		
	Note involved in either	=0 Points		
	19. CoC/HMIS Advisory Attendance		HMIS/CoC Ad	HMIS/CoC Advisory Sign
	Attended >75% of Meetings	=10 Points		Up Sheets
	Attended <75% of Meetings	=0 Points	1	
СоС	20. Project Monitoring Results		energe/4 -	CoC Monitoring Reports
Monitoring	No unresolved monitoring issues or issues resolved	=10 Points		
	Unresolved monitoring issues	=0 Points		
Bonus	21. Occupancy/Average Daily Unit Utilizati	on	40/11/20	See Question 2
	>95% =10 Points			
	22. Participation in HOTHC General Meetings (Jan- Dec 2016)			Attendance Logs
	>8 Meetings a year	=10 Points		
	23. Two Consecutive Years of Expendature			LOCCS
	95% or greater =10 Points			
Penalty	24. Application Turned in After Due Date			Submission Date in E-
chaity	If turned in late, penalty of 10 points	=-10 Points		snaps

Heart of Texas CoC: 2017 NOFA Competition Scoring Sheet for New Projects

Agency:	
Project:	
Name of Reviewer:	
Date:	·
Threshold Review	
Threshold Review Criteria Applicants must fully meet threshold criteria. Projects not meeting all the specified criteria will not be reviewed further.	Meets Criteria? Yes or No
Project must be for eligible housing: rapid rehousing, permanent supportive housing or transitional housing/Rapid Rehousing; or for HMIS expansion or additional services for the Coordinated Entry System, or the new transitional housing to rapid rehousing (TH-PH-RRH) projects	
For housing projects, The population served must meet program eligibility requirements, including:	
 PSH: All projects must primarily serve chronically homeless individuals and/or families, as defined by HUD. All projects must be either 100% dedicated to chronically homeless or all beds/units must be Dedicated PLUS This will be demonstrated by conformity with HUD Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons. All projects must serve exclusively disabled individuals/households as defined by HUD RRH: Eligible RRH participants include: Residing in place not meant for human habitation Residing in emergency shelter Meet DV criteria in homeless definition (category 4) Residing in a TH project eliminated in the 2017 competition Residing in TH funded as part of a joint TH PH-RRH project Receiving assistance from a VA homeless program and met one of the above criteria on intake into the VA program 	

Threshold Review Criteria Applicants must fully meet threshold criteria. Projects not meeting all the specified criteria will not be reviewed further.	Meets Criteria? Yes or No
 TH-RRH: Same eligible participants as RRH All projects must serve 100% literally homeless families and/or single adults coming from emergency shelters and/or unsheltered locations or those fleeing domestic violence. TH-PH-RRH. Participants must meet eligibility criteria as indicated in the 2017 NOFA. All participants must initially receive TH services and transition as soon as practical to rapid rehousing. All projects must serve 100% literally homeless families and/or single adults coming from emergency shelters and/or unsheltered locations or those fleeing domestic violence. TH-PH-RRH. Participants must meet eligibility criteria as indicated in the 2017 NOFA. All participants must initially receive TH services and transition as soon as practical to rapid rehousing. 	
 Projects can request only these funds for a term of one year: PSH: Rental assistance (tenant, sponsor, or project based), leasing or operating funds, supportive services, HMIS and administrative costs RRH: Rental assistance (tenant based only) supportive services, HMIS and administrative costs TH-RRH: For TH component – operating, leasing or rental assistance, for RRH component tenant based rental assistance only, supportive services and admin costs eligible for entire project.TH-RRH: Operating or leasing assistance and supportive services for the TH phase; tenant based rental assistance plus supportive services for the RRH phase. 	

Project meets threshold eligibility criteria?

Yes		
No		
Comments:		
	• ,	
		-

Application Scoring

Sco	ring Factor	Maximum Points	Score Assigned
1)	History and Experience (40 points):	40	
	a) Applicant and sub recipient(s)' prior experience in serving homeless people and in providing housing and services like that proposed in the application. Experience of relevant staff – even if at a different agency – will count toward agency experience. (20 points)		
	b) Satisfactory experience with prior HUD grants and other public contracts, including satisfactory drawdowns and performance for existing grants as evidenced by timely reimbursement of sub recipients (if applicable), regular drawdowns, timely resolution of monitoring findings, and timely submission of APRs on existing grants. (20 points)		
Proj	ect Quality		
	PSH: Prioritizing Highest Need (15 points): a) Does the project target a high priority, literally homeless population? Are all units designated for chronically homeless? Will participants be offered housing based on their severity of need and length of time homeless? (9 points)	15	
	uses to determine severity of need for the chronically homeless. (2 points)		
	 Clearly describes its process for prioritizing persons with the most severe needs. (2 points) Clearly describes the outreach process used to engage chronically homeless persons living on the streets and in shelter. (2 points) 		
. [octions to consider: Does the applicant demonstrate a clear understanding of the priority actablished in Nation CRD 16, 11, Priority in a		
F \	rder of priority established in Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Yulnerable Homeless Persons?		
	Poes the applicant describe a specific plan for how the project vill participate in the CoC's coordinated entry system?		

Scoring Factor	Maximum Points	Score Assigned
 Does the applicant describe a plan for an outreach process to engage those persons that is that is adequate and consistent with the Notice? 		
 Does the applicant identify specific and appropriate programs (street outreach, shelters) from which it obtains referrals of potential eligible program participants that will ensure the project operates at full capacity and that eligible persons are served with the most severe needs are served? 		
 3) RRH and TH-RRH: Effective outreach and placement system (15 points) Extent to which the applicant: a) Describes how its activities will be targeted toward literally homeless individuals and families. If coordinated entry is operational, the applicant should describe how it will receive referrals and provide notification of available (5 points) b) Clearly describes how households will be assisted to obtain housing as quickly as possible. (10 points) 	15	
Questions to consider		
 Does the applicant describe a specific and viable plan for how the project will participate in the CoC's coordinated entry system? If coordinated entry is not operational in the applicant's area, does the applicant demonstrate that all participants will be literally homeless prior to entry? 		
 How will participants obtain housing? What assistance is provided? How will TH-RRH projects ensure that participants remain in TH 		
 How will TH-RRH projects ensure that participants remain in TH for as short a period of time as possible? 		
4) Housing First (15 points)	15	
 Extent to which the applicant: a) Has successfully operated a program that is based on Housing First principles. (5 points) b) Clearly describes a program design that is consistent with a 		
Housing First approach (i.e., A model of housing assistance that is offered without preconditions, such as sobriety or a minimum income threshold, or service participation requirements, and rapid placement and stabilization in		
permanent housing are primary goals. Participants are only terminated from the program based on violation of standard lease terms not due to program requirements.) (10 points)		
Questions to consider:		
Extent of experience and outcomes of projects operated by		

Scoring Factor	Maximum Points	Score Assigned
 applicant that follow Housing First. Does the applicant clearly demonstrate a model that offers initial access to housing without preconditions, such as sobriety, creditworthiness, income requirements and service participation? Does the applicant clearly demonstrate a model in which continuation of housing is not contingent on service participation requirements or compliance? Does the applicant clearly demonstrate that rapid placement and stabilization in permanent housing are primary goals of the project? Does the applicant clearly describe a project design that is adequate to accomplish those goals? Does the applicant clearly demonstrate a model in which participants are expected to comply with a lease agreement and are provided with services and supports to help maintain housing and prevent eviction? 		
 Services Program (15 points) Extent to which the applicant: a) Clearly describes how it will assist participants to remain stably housed. Describes how case management services will be provided to participants. (5 points) b) Has a plan to increase participant's incomes through employment and/or benefit income and/or describes how disabled persons will be assisted in obtaining benefits and services. (10 points) 	15	
uestions to consider:		
Does the applicant describe how case managers will assist participants in maintaining housing stability? Does it indicate any evidence based practices that will be employed? Does the application provide information on the frequency of contact with case managers and process for developing and updating a housing stability plan for all participants? Does the applicant provide a plan for how the participants will increase or maintain their income (either through employment or assistance in obtaining benefits) and how participants will be connected to employment or other meaningful activity?		

Sco	oring Factor	Maximum Points	Score Assigned
Во	nus Questions:		
6)	HMIS and SSO for Coordinated Entry Need (up to 20 points) Does applicant provide a clear and compelling description as to why the expansion in services is needed and how the expanded project will benefit the CoC.	20	
7)	Project Quality (up to 40 points) Does the applicant provide a clear description of the additional services to be provided, does the applicant demonstrate a capacity to implement and manage the expanded project; and will the project contribute to system performance improvements?	40	
Tot	al Score Awarded		



2017 NOFA

2017 NOFA application information

2017 NOFA announcement

2017 NOFA Program Registration

2017 NOFA Program Registration Notice

2017 NOFA Policy Requirements and General Section

2017 NOFA General-Section-FONSI

2017 NOFA Timeline of Important Dates and Deadlines

2017 NOFA Renewal Scoring Rubric

2017 New Project Threshhold & Scoring Tool

2017 Renewal CoC Project Evaluation Tool

TX 604 Waco CoC Policies and Procedures

CoC Grievance Procedure

TX-604 Scoring Ranking Policies & Procedures



Heart of Texas CoC FY 2017 NOFA Competition Project Ranking and Reallocation Policy

Purpose

On an annual basis, the Heart of Texas Continuum of Care is required to rank all new and renewal projects submitted to HUD for funding in an order that reflects the CoC's needs and priorities. Additionally, HUD requires CoCs to review the performance of all funded projects and seek to reallocate funding away from low performing projects or those providing services that are of a lower priority in preventing and ending homelessness.

The Heart of Texas CoC is seeking to accomplish the following in the ranking and reallocation of projects:

- Incentivize all providers to focus on outcomes and to seek to achieve the performance targets specified by the CoC.
- Encourage providers to adopt evidence based practices including Housing First to more effectively employ CoC resources.
- Replace projects that are not high performing or following evidence based practices with new projects that follow CoC and HUD priorities.

Policy

All new and renewal projects will be ranked by the CoC. The primary factor controlling the ranking of projects will be the scores assigned to renewal and new projects. Scoring is based on project performance, grant management, community outcomes, and adherence to policy priorities. Except as specified below, projects will be ranked in the NOFA competition by the scores assigned to renewal or new projects.

There are two categories of projects that will not be ranked according to performance scores:

- Projects that are essential to the operation of the CoC. This includes funding for HMIS and Coordinated Entry. These are unique projects focused on CoC operations and that cannot be readily evaluated or compared to other CoC funded projects. Failure to renew this funding would have negative consequences for the CoC and jeopardize future funding opportunities.
- First time renewal of newly funded grants. HUD requires newly funded one-year project grants
 to be renewed in the competition. In most instances, these projects will have not yet started
 operations. In other instances, the projects have just started but are far from being able to
 report on a full year of operations in the APR.

The two project types identified above will not be assigned scores. These projects will be ranked by the CoC to assure – to the maximum extent possible – that they will be funded in the competition. Subject

2017 HEART OF TEXAS COC NOFA PROJECT RANKING AND REALLOCATION POLICY

to review based on the actual NOFA, these projects will be ranked at the bottom of Tier 1, with all of their funding above the Tier 1/Tier 2 demarcation.

All other CoC projects will be ranked according to scores:

- Renewal projects will be ranked according to adjusted renewal project score. Renewal scores
 will be adjusted as follows: if the highest scoring renewal project scores less than 200 points,
 then all renewal scores will be adjusted upward by the difference between the highest scoring
 renewal project and 200. Renewal projects that qualify for renewal based on the renewal
 performance evaluation will be ranked above new projects.
- New projects will be ranked according to scores.

Current CoC grantees may elect to reallocate some or all of the funding associated with their project. These reallocated projects will be scored as new projects and ranked according to score the same as all new and renewal projects. CoC grantees in good standing (no outstanding HUD or CoC monitoring findings and no open audit findings) may voluntarily reallocate their funding and will not have to compete with other organizations for that funding.

The minimum score for automatic renewal of CoC funded projects is 65% of the highest scoring project.

If the highest scoring project receives a score of 200, then all projects scoring below 130 will be reallocated unless a Project Improvement Plan has been submitted and approved by the CoC board. Should the highest scoring project receive a score of 190, then the minimum acceptable score would be 123.5.

The Project Improvement Plan must specify how the project will improve performance and meet standards in the upcoming year. If the CoC board accepts the Project Improvement Plan, the grantee will be allowed to apply for renewal funding.

Any legal applicant for CoC funds can apply for new projects from the bonus pool or the uncommitted reallocation pool. The CoC will only rank new projects for which there is sufficient funding in the new or reallocation pool to fully fund the project.

Policy on Expenditure of Grant Funds

Funds unexpended at the completion of the grant term are recaptured by HUD. In some instances these funds are then allocated to other CoCs or in other cases are returned to the federal treasury. The Heart of Texas CoC seeks to minimize this recapture of funding and to the maximum extent possible ensure that homeless assistance funding allocated to the City of Waco is used to support homeless people in the city.

Underexpenditure policy

It is the policy of the Heart of Texas CoC that CoC funds granted to an applicant agency will either be fully expended to assist eligible homeless people or the CoC will recapture the unspent funding and add it to the pool of resources available for reallocation.

Heart of Texas CoC grantees that expended less than 90% of their funding in the most recent grant year will face recapture of unexpended funding that exceeds 10% of the grant funds. If, for example, the CoC grant was for \$100,000 and \$85,000 was expended, the grantee would see \$5,000 in funding

2017 HEART OF TEXAS COC NOFA PROJECT RANKING AND REALLOCATION POLICY

recaptured. Recapture of unexpended funding that exceeds 10% of the total grant will be automatic. The Scoring/Ranking Committee may consider extenuating circumstances regarding projected expended funds. For example, an agency had staff vacancies at the beginning of the grant cycle and all vacancies have been filled later in the grant cycle altering the capability of the program to serve greater number of clientele which would increase projected expenditures. The applicant must put any considerations based on circumstance in writing to the Scoring/Ranking Committee.

Grantees may also prevent this automatic recapture by submitting an appeal to the Board of the CoC. The appeal will need to: explain the reason for the under-expenditure and provide a plan for fully expended the grant in the current cycle. The Board may approve the request at its discretion. However, if the funds are restored and under-expended in the subsequent grant cycle funding will be recaptured as indicated above. All CoC board decisions can be appealed but a second appeal would require extraordinary circumstances to be approved.



HEART OF TEXAS HOMELESS COALITION

Advocacy, Assistance & Acknowledgment

TX 604 Waco/McLennan County

CONTINUUM of CARE (CoC)

Governance Charter And Policy and Procedures

Amended 2/17/2017

Revised Format Approved 9/15/2017

TX 604 Waco/McLennan County CONTINUUM of CARE (CoC) Governance Charter

Revised Format Approved September 15, 2017

The mission of the Continuum of Care is to lead and implement strategies and resources to end homelessness.

CoC Governance Structure

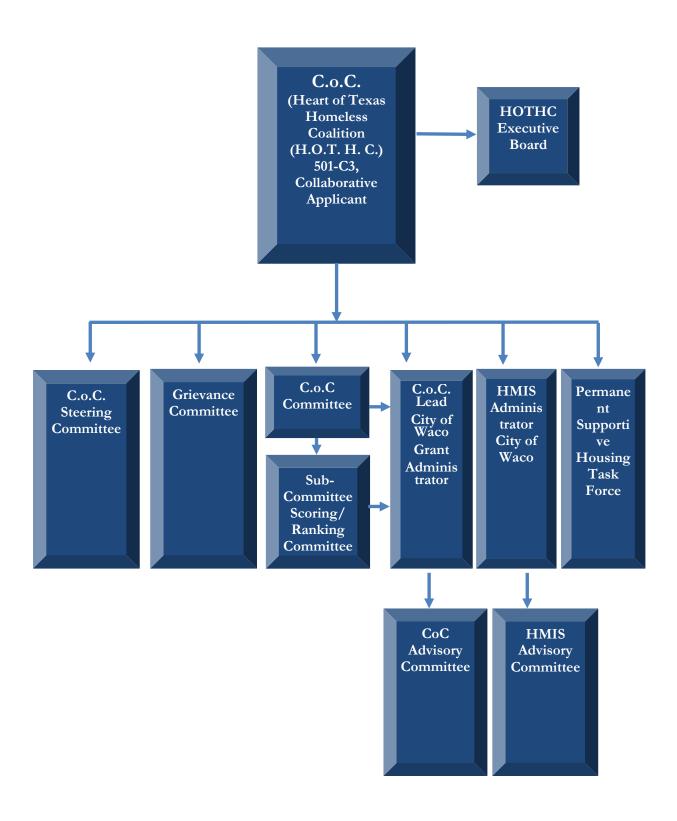
The Charter identifies the CoC's governance structure, including CoC Lead/Collaborative Applicant and HMIS Lead Agency designations and purposes. The Charter also describes the purposes of the CoC Board and other committees.

The name of the affiliation is the TX 604 Waco/McLennan County Continuum of Care (CoC) which operates in concert with the Heart of Texas Homeless Coalition (HOTHC), recognized by the IRS as a 501c3 non-profit organization.

The geographic area of the TX 604 CoC includes 6 counties in the state of Texas: McLennan, Hill, Bosque, Limestone, Freestone, and Falls. Within these counties, the Heart of Texas Homeless Coalition (HOTHC) conducts local CoC planning, housing and service development and delivery, and evaluation, as well as CoC-wide activities through the general membership, HOTHC Board, and committees.

The TX 604 CoC consists of:

- CoC General Members
- HOTHC Board of Directors
- CoC Standing Committees
- CoC Ad Hoc Committees
- CoC HMIS Lead
- CoC Lead Agency/Collaborative Applicant



CoC General Membership

The General Membership represents persons experiencing or at risk of homelessness, providers of homeless services, and other relevant organizations and community stakeholders to establish a Continuum of Care and a CoC Board, and to fulfill the CoC's responsibilities, as required by HUD. The responsibilities of the CoC may be completed by the membership at large, or through delegation to the CoC Board, CoC committees and work groups, the CoC Lead Agency, or other groups.

CoC General Members are those organizations and persons participating in local homeless planning efforts in the TX 604 CoC's geographic area, including; persons participating in the work of the HOTHC Board, and/or committees. Homeless and/or formerly homeless individuals, organizations and other interested individuals make up the lead workgroups responsible for managing community planning, coordination, and evaluation to ensure that the system of homeless services and housing rapidly ends people's homelessness permanently. This includes planning for the use of HUD HEARTH CoC resources and coordinating these funds with other resources in their communities. General Membership includes representatives of relevant organizations, e.g., homeless services providers, victim services providers, medical services, law enforcement, school districts, and agencies serving other homeless subpopulations.

HOTHC Board

The CoC HOTHC Board is the primary decision-making body for the TX 604 CoC. Board members determine the policy direction of the CoC and ensure that the CoC fulfills its responsibilities as assigned by HUD. Additionally, the Board oversees and approves the work of CoC committees and workgroups. The Board will consist of a minimum of nine members to a maximum of fifteen members The CoC will ensure that the CoC HOTHC Board, its chair, and any persons acting on behalf of the Board comply with a code of conduct and with conflict-of-interest requirements and recusal processes. The CoC HOTHC Board will strive to ensure broad representation among the 15 positions, including community stakeholders from around the CoC's geographic area and agency staff representing the major homeless subpopulations. Individual Board members may represent multiple sectors or stakeholders. Board members and officers are elected by the full CoC membership at the CoC General Meeting held in January of each year. Board members will serve staggered terms of two years so that every year, half of the positions will stand for election. See the HOTHC Bylaws (Appendix A).

CoC Lead

The City of Waco has been selected by the TX 604 CoC to serve as the CoC Lead Agency to provide staff support to the Board and committees that constitute the CoC. The lead agency performs a variety of necessary functions such as performance monitoring, engagement and eduction of stakeholders, planning activities to improve the housing crisis response system, and submission of the annual collaborative CoC Program grant application. The CoC Lead Agency manages all aspects of the CoC, including ensuring all federal CoC Program requirements are met.

CoC HMIS

The TX 604 CoC has designated the City of Waco as lead in data management. Bowman is the HMIS system utilized for meeting HUD client level data collection and reporting.

Emergency Solutions Grant (ESG) Lead

One agency, Salvation Army, currently applies for ESG funding. Data from services provided are
included in HMIS and this organization also participates in CoC strategic planning and inclusion
in the Consolidated Plan. Project funding is approved by the State of Texas, HOTHC, and the City
of Waco. Monitoring performance is provided by the CoC Committee.

CoC Standing Committees

- The CoC Committee is a standing committee which serves as a means for the Board, Corporation, and Membership to concentrate efforts to sustain and improve the CoC Programs. CoC Committee responsibilities include; review of CoC Policieand Procedures annually, review tools and recommend prioritization methodology for the collaborative grant application process, perform quarterly monitoring of program performance and identifies and recommends strategies for meeting community needs or gaps in services. Stakeholders representing sectors of the community comprise this committee including; non-profit homeless providers/business, public housing, school districts, unaccompanied youth, social services providers, universities, affordable housing developers, victim services, government, advocates, mental health agencies, hospitals, law enforcement, substance abuse, veteran service providers, and local foundations.
- The Scoring and Ranking Committee is a sub-committee of the CoC Committee which utilizes
 tools and policies and procedures to score and rank projects for the HUD collaborative
 application. This committee shall consist of an uneven number of voting members, with a
 minimum of five members. This committee meets annually. Members of this committee must
 have no direct or indirect conflict of interest and must abide by the CoC Code of Conduct,
 Conflict of Interest and Recusal Policies (Exhibit A)
- The Grievance Committee receives from the CoC Lead written grievance from applicant organizations of the collaborative grant application which has not been resolved through CoC Lead response. The Grievance Committee will review the grievance for any violation, improper application, disparity in the application of rules or process which results in the organization being adversely affected by the score and rank assigned. The committee will send a written response to the CoC Lead who will notify the organization of results of the review. Members of this committee must have no direct or indirect conflict of interest and must abide by the CoC Code of Conduct, Conflict of Interest and Recusal Policies. (Exhibit A)
- The Steering Committee receives from the CoC Lead written grievance from applicant organization of the collaborative grant application which has not been resolved through CoC Lead response or review and response by the Grievance Committee. The Steering Committee will review the grievance and any other additional information submitted by the applicant organization for any violation, improper application, disparity in the application of rules or process which results in the organization being adversely affected by the score and rank assigned. The committee will send a written response to the CoC Lead who will notify the organization of results of the review which are final. If not satisfied, the applicant organization may at that point submit application directly to HUD. Members of this committee must have no direct or indirect conflict of interest and must abide by the CoC Code of Conduct, Conflict of Interest and Recusal Policies. (Exhibit A)

- Permanent Supportive Housing Task Force is a committee designed to carry out CoC goals of creating greater housing opportunities for individuals and families experiencing homelessness. This committee meets monthly.
- The CoC Advisory Committee provides guidance to the HOTHC Board, CoC Lead, and Membership on aspects of planning, implementing, and evaluating provision of an effective crisis housing response system.
- The **HMIS Advisory Committee** provides guidance to the HOTHC Board, CoC Lead, and Membership on data management as a tool for planning, program compliance and evaluation of community needs and gaps in services.
- CoC Ad Hoc Committees are formed by the CoC HOTHC Board as short-term workgroups on an
 as-needed basis to accomplish certain tasks. Ad hoc committee membership will vary depending
 on the particular needs of the group. Each ad hoc committee will be led by a Chair and a CoChair. Other committee members may be other members of the HOTHC Board, General
 members, and/or other stakeholders.

While decisions for the Continuum will be made by the CoC General Membership and/or HOTHC Board, the work of the Continuum will generally be carried out by committees and, as appointed by committees, subcommittees. Committees may make recommendations regarding policies and procedures for voting approval by the CoC HOTHC Board. The HOTHC Board will establish standing committees as necessary to ensure all CoC responsibilities are fulfilled according to HUD regulations.

Exhibit A



TX 604 Waco/McLennan County CONTINUUM of CARE (CoC)

Code of Conduct, Conflict of Interest And Recusal Policies

Section 1 - Purpose

The purpose of the Code of Conduct, Conflict of Interest, and Recusal Policies is to maintain high ethical standards and establish procedures which guide the recusal process and administrative or disciplinary actions for violations. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

Section II - Procedures

Conflict of Interest

An officer, member, member of a committee, agent or hired staff, including staff hired through MOU or Pass Through Agreement, with governing board delegated powers must disclose the existence of possible direct or indirect financial, or material gain to the governing board or committee with governing board delegated powers. This includes real or apparent conflicts of interest that may arise among officers, employees or agents, or any member of his or her immediate family, his or her partner or an organization that employs any of the indicated parties. This includes organizational conflicts of interest.

After disclosure, he/she may choose to voluntarily relinquish voting rights or abstain from serving on a committee relevant to the award of grants, provision of financial benefits, transaction or arrangement. If further determination is warranted, he/she shall leave the governing board or committee meeting while determination of a possible conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

If a conflict of interest exists, the individual with the association will be required to abstain from voting or serving on a committee with governing board delegated powers.

If the governing board or committee has reasonable cause to believe an officer or committee member has failed to disclose actual or possible conflicts of interest, it shall inform the individual of the basis for such belief and afford the individual an opportunity to explain the alleged failure to disclose. If, after hearing the individual's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action which could include ensuring the individual with the association abstains from voting or serving on a committee with governing board delegated powers up to dismissal of the individual from board or committee membership.

Acceptance of Gifts or Favors

An officer, member, member of a committee, agent or employee, including staff hired through MOU or Pass Through Agreement, may neither solicit nor accept gifts or gratuities, favors or anything in excess of minimum value from potential grant awardees, contractors, or parties to sub agreements where the receipt would either compromise impartial performance or give the appearance of compromising impartial performance.

If the governing board or committee has reasonable cause to believe an officer, committee member, agent or employee has violated this policy, it shall inform the individual of the basis for such belief and afford the individual an opportunity to explain the alleged violation. If, after hearing the individual's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has violated policy, it shall take appropriate disciplinary and corrective action which could include dismissal of the individual from board or committee membership.

Fraud Intolerance

The term fraud refers to, but is not limited to: intentionally entering false or erroneous information into electronic software systems; any dishonest or fraudulent act; forgery or alteration of any official document; misappropriation of funds, supplies, or Continuum of Care materials; improper handling or reporting of money or financial transactions; profiting by self or others as a result of inside knowledge; destruction or intentional disappearance of records, furniture, fixtures, or equipment; accepting or seeking anything of material value from vendors or persons providing services or materials to the Continuum of Care for personal benefit; or any similar or related irregularities.

Fraudulent acts will not be tolerated and may result in termination from Board membership. Fraudulent acts will be pursued to the fullest extent and may result in criminal charges.

A Board Member who has reason to believe that there may have been an instance of fraud, improper action, or other illegal act in connection with a Continuum of Care program, function or activity shall report it immediately to the TX 604 HOTHC Board.

Improper actions are actions undertaken by a Board Member in the performance of their official duties that: (a) are in violation of any federal, state, or local law; or (b) constitute an abuse of authority; or (c) create a substantial, specific danger to public health or safety; or (d) misuse of Continuum of Care funds; or (e) represent a conflict of interest.

Reported incidences will be investigated as expeditiously as possible by the Governance Committee and/or Governance Committee Co-Chair members as appropriate. When an investigation confirms that fraud or an illegal act(s) has occurred, appropriate corrective action will be taken.

The Code of Conduct, Conflict of Interest and Recusal Policies form will be signed annually by HOTHC Board members, and committee and sub-committee members with board delegated decision-making responsibilities. (Appendix A)

I attest the Code of Conduct, Conflict of Interest and Recusal Policies were revised and adopted on by the TX 604 HOTHC Board.

Melinda Bonds, Chairman

Malinda Bondo

Heart of Texas Homeless Coalition

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TX 604 Waco/McLennan County CONTINUUM of CARE (CoC)

Policies and Procedures

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Section One: Continuum of Care Membership and Responsibilities (24 CFR part 578.5(a) and 578.7)

Policy:

The TX-604 Waco/McLennan Continuum of Care (CoC) will be established by representatives from relevant organizations within the geographic area of the CoC. Relevant organizations include nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans, domestic violence victims, youth and homeless and formerly homeless individuals.

The CoC geographical area covers six counties as designated by the U.S. Department of Housing and Urban Development (HUD): McLennan, Falls, Bosque, Hill, Limestone, and Freestone.

The TX-604 Waco/McLennan County CoC will establish and follow protocols for full CoC Assembly meetings, including:

- 1. Provide a public means of extending the invitation within the CoC's geographic area at least annually.
- 2. Establish committees, subcommittees, or workgroups/taskforces to fulfill the CoC's responsibilities
- 3. Document and adhere to a process of appointing members to committees, subcommittees, or workgroups/taskforces

Procedure:

The Heart of Texas Homeless Coalition (HOTHC) Board and their designees will contact representatives of relevant organizations to solicit their membership in the CoC.

- 1. Each member of the CoC is responsible for helping to recruit new members.
- 2. All members will contact representatives of relevant organizations to solicit their membership in the CoC.
- 3. All CoC members who provide homeless services will identify and contact consumers who are or were homeless to invite their participation in the CoC.
- 4. Open invitation to join the CoC will remain posted on the HOTHC website.
- 5. An invitation for membership will be sent from the HOTHC listserv annually.
- 6. At least annually, the HOTHC social media sites will include an invitation to join the CoC.

Membership may be on an individual or agency basis. No more than two representatives from one agency will be eligible to vote at a general membership meeting.

Individual membership dues are \$15 per year; \$25 per year for nonprofit organizations; and \$50 per year for profit entities. State agencies are exempt from paying dues. Individual employees are encouraged to register as individual; however, this will not affect voting privileges.

Current agency membership dues are not a requirement in order to be eligible to vote at general membership meetings. In order to be a voting representative, an individual or agency must attend a

minimum of seven meetings during a twelve month period. Members must be present to vote and proxy voting is not allowed at General Membership meetings.

Control of this corporation shall rest with the membership. Any action of the board of directors shall be subject to review by the membership on request of any member at the regular meeting. An action of the board of directors may be altered or rescinded by two-thirds vote of the membership present at a regular meeting.

Regular meetings of the membership shall be held each month unless the board of directors shall determine otherwise. In no event shall fewer than eight (8) such meetings be held in any one fiscal year. All meetings are open meetings regardless of status of dues. CoC Assembly agendas will be posted on the Heart of Texas Homeless Coalition (HOTHC) website at www.heartoftexashomeless.org one week prior to the meetings.

The membership meeting in January shall be designated as the Annual Meeting for the election of officers and members of the board of directors.

Special meetings of the members may be called by the Chairperson, the board of directors or upon written request to the Chairperson signed by five (5) or more members.

Section Two: Continuum of Care Board Requirements (24 CFR part 578.7(b))

Policy:

The TX-604 Waco/McLennan County Continuum of Care (CoC) will follow written processes to select the Heart of Texas Homeless Coalition (HOTHC) Board of Directors and the CoC Committee of the Board of HOTHC to act on behalf of the CoC. (HOTHC Bylaws Appendix B) The CoC will review, update, and approve the selection process at least once every five years.

The HOTHC Board of Directors will be representative of the relevant organizations and of projects serving homeless populations and include at least one homeless or formerly homeless individual.

The CoC will ensure that members of the HOTHC Board, CoC Committee, sub-committees and any persons acting on behalf of the CoC Committee comply with the Code of Conduct, Conflict of Interest and Recusal Policies. HOTHC Board members as well as officers, agents, staff, and any committee members with governing board delegated powers will sign a Code of Conduct, Conflict of Interest, and Recusal Policies Form annually.

The CoC Committee of the Board is a standing committee of the HOTHC Board of Directors and shall serve as a means for the Board, Corporation, and Membership to concentrate efforts to sustain and improve the CoC Programs. The CoC Committee of the Board shall consist of an uneven number of voting members, with a minimum of seven, of whom no more than five shall be members of the HOTHC Board of Directors. It shall also include at least three non-voting members.

Procedures:

Membership requirements to serve on the HOTHC Board of Directors are detailed in the HOTHC By-laws.

At least once every five years, the CoC membership will schedule a review of the board selection process for the CoC's annual meeting.

To serve on the CoC Committee of the Board members must meet the following minimum requirements:

- 1. Members must reside or work within the CoC's geographical area.
- 2. The Chair and voting members of the CoC Committee shall be appointed by the HOTHC Board of Directors in collaboration with the CoC Collaborative Applicant and HMIS Lead.
- 3. The Chair of the CoC Committee, the Continuum of Care Lead, and the HMIS Lead shall be included among the non-voting members of the CoC Committee.
- 4. Each HUD CoC grant recipient may nominate 1 voting member and one alternate voting representative to this committee.
- 5. Must attend a minimum of 75% of the regular coalition meetings (General Membership) in a calendar year.
- 6. Must be current with membership fees each year.
- 7. The voting members shall be individuals who have no potential conflict of interest related to policy and financing decisions related to the CoC.
- 8. Must disclose potential conflicts of interest and sign a conflict of interest statement annually AND must recuse from voting on any matter that is a conflict of interest.

The CoC Committee shall execute the following duties:

- 1. The Committee is responsible for the review, providing guidance as needed, and approval of the following areas of recommendations for action:
 - a) The prioritization of funding needs and strategies to finance housing and services for people experiencing homelessness.
 - b) The emphasis or direction of service delivery approaches for the CoC.
 - c) The identification and prioritization of service needs or gaps in service.
 - d) Responsibilities and duties of convening the HUD Continuum of Care.
 - e) Monitoring CoC recipient and sub-recipient performance, evaluation of program outcomes, and recommendation of corrective action, as needed.
- 2. Develop policies and procedures conforming to the U.S. Department of Housing and Urban Development (HUD) requirements detailed in 24 CFR part 578.1 to:
 - Review and approve for execution the Memorandum of Understanding (MOU) for The City
 of Waco as the CoC Lead Agency to serve as the Collaborative Applicant to operate the
 Continuum of Care if The City of Waco is designated by the CoC Committee;
 - b. Review and approve for execution the Memorandum of Understanding (MOU) for The City of Waco as the CoC Administrator of the Homeless Management Information System if The City of Waco is designated by the CoC Committee; and
 - c. Conduct year-round Continuum of Care planning of homelessness and homeless prevention housing and services.

- 3. Planning oversight includes:
 - a. program development
 - b. implementation design
 - c. financing strategies
- 4. Review the responsibilities of the standing committees, or other committees, subcommittees, and workgroups/taskforces annually.
- 5. The Scoring/Ranking Committee, a standing sub-committee, reports to the CoC Committee of the Board with duties that include, but are not limited to, the following:
 - a. Reviews each renewing grants program and/or new project proposals, hears presentations by grant applicants and may conduct site visits with each agency.
 - b. Recommends the methodology of prioritizing the grant programs for the CoC Program NOFA Application to the CoC Committee of the Board for approval.
 - c. Determines the CoC Program NOFA Application priority rankings based on the approved prioritization methodology.
- 6. Continuously review CoC program performance through HMIS reporting.
- 7. Receive quarterly reports from all standing committees, workgroups/taskforces and HMIS program.
- 8. Maintain and update the CoC Policies and Procedures Manual needed to comply with requirements associated with establishing and operating a CoC and HMIS requirements prescribed by HUD.

Section Three: Continuum of Care Structure and Delegation (24 CFR part 578.7(a))

Policy:

The TX-604 Waco/McLennan County CoC will establish and follow protocols for full CoC Assembly meetings, including:

- 4. Meet at least six times annually
- 5. Publish the agenda prior to the meeting
- 6. Establish minimum standards for inviting new members to join
- 7. At least annually, invite new members to join
- 8. Provide a public means of extending the invitation within the CoC's geographic area
- 9. Establish committees, subcommittees, or workgroups/taskforces to fulfill the CoC's responsibilities
- 10. Document and adhere to a process of appointing members to committees, subcommittees, or workgroups/taskforces

Procedures:

Minimum Membership Standards

1. Membership in the CoC is open to agencies, organizations and individuals that provide or facilitate homeless services or advocate for services for those experiencing homelessness. Each agency or organization that is a recipient of HUD Continuum of Care funding will have only one voting

- representative and one alternate voting representative at any given time. These individuals will also serve as the official contact persons for the agency or organization that she/he represents.
- Member agencies or organizations will notify HOTHC, in writing, of the voting representative and alternate. Their telephone numbers and email addresses must be provided for communications. Additional agency or organization personnel email addresses can be provided to receive communications.
- 3. Prospective members may attend any CoC meeting as a non-voting member before joining.
- 4. Membership fees shall be paid in January of each. New members will pay the full amount of annual dues.

Agenda Publication:

- 7. CoC Committee agendas will be emailed to the HOTHC listserv one week prior to the meetings.
- 8. CoC Assembly agendas will be posted on the Heart of Texas Homeless Coalition (HOTHC) website at www.heartoftexashomeless.org one week prior to the meetings.
- 9. Each member of the CoC is responsible for helping to recruit new members.
- 10. All members will contact representatives of relevant organizations to solicit their membership in the CoC.
- 11. All CoC members who provide homeless services will identify and contact consumers who are or were homeless to invite their participation in the CoC.
- 12. An invitation for membership will be sent from the HOTHC listserv annually.
- 13. At least annually, the HOTHC social media sites will include an invitation to join the CoC.

Establishing Committees, Sub-committees and Workgroups/Taskforces:

- 1. All standing committees, sub-committees and workgroup/taskforce chairs are appointed by the CoC Committee Chair.
- 2. Committees, sub-committees and workgroups/taskforces will be established as needed to fulfill the CoC Strategic Plan.

Section Four: Continuum of Care Governance Charter (24 CFR part 578.7(a))

Policy:

In accordance with the 2009 HEARTH Act the TX-604 Waco/McLennan County CoC has established a governance structure to act on its behalf. Governance is provided by the Heart of Texas Homeless Coalition (HOTHC) as the current Collaborative Applicant.

The TX-604 Waco/McLennan County CoC's governance charter will:

- Be reviewed annually and updated as needed by the CoC Committee of the Board in consultation with the HMIS Administrator and Collaborative Applicant; changes must be approved by the HOTHC board of directors and ratified by the CoC Committee.
- 2. Define the CoC's governance structure, including designating the HMIS lead and Collaborative Applicant and the responsibilities for each;
- 3. Define the responsibilities of committees, subcommittees, or workgroups/taskforces;

- 4. Specify policies and procedures needed to comply with requirements associated with establishing and operating a CoC and HMIS requirements prescribed by the U.S. Department of Housing and Urban Development (HUD);
- 5. Define the code of conduct and recusal process for committee, its chair(s), and any person acting on behalf of the CoC Committee of the Board.

Procedures:

Heart of Texas Homeless Coalition (HOTHC) By-laws and the CoC Policies and Procedures will be reviewed annually. The HOTHC Board will facilitate a committee of four (4) persons appointed by the HOTHC Board of Directors Chair to review the By-laws and CoC Policies and Procedures. At least two members must be appointed from the CoC Committee.

The CoC Assembly shall select a lead agency to provide staff to the various committees and work groups that constitute the CoC. The lead agency will perform a variety of necessary functions such as performance monitoring, engagement and education of stakeholders and submission of the annual collaborative CoC grant application. The CoC Committee will maintain an MOU agreement with the lead agency that is reviewed annually and updated periodically. The lead agency will be eligible to apply for CoC planning funds through the CoC grant process when available. These funds may be used to provide dedicated staff and resources to the support of the CoC as specified by HUD guidelines.

At this time, the City of Waco has been designated as the lead agency.

The CoC Committee will select an administrator for the Homeless Management Information System (HMIS) for the CoC. The CoC Committee will maintain an HMIS Governance Agreement with the HMIS Administrator. This agreement is reviewed annually and updated periodically. The administrator is eligible to apply for HMIS funds through the CoC grant process and other sources and will use these funds to dedicate staff and resources to the functions of the HMIS as specified by HUD guidelines.

At this time, the City of Waco has been designated as the HMIS administrator for the CoC.

The HOTHC By-laws and CoC Policy Procedures committee will make recommendations to the HOTHC Board at a regular meeting. Revisions and/or additions can be made by a simple majority (at least 51%) of affirmative votes. Proposed amendments must be in written form and distributed to the members of the HOTHC Board of Directors prior to the presentation and vote.

The responsibilities of the CoC Committee are as follows:

- 1. Develop policies and procedures conforming to the U.S. Department of Housing and Urban Development (HUD) requirements detailed in 24 CFR part 578.1 to:
 - Review and approve the execution of the Memorandum of Understanding (MOU) if the City of Waco is designated the CoC Administrator of the Homeless Management Information System; and
 - b. Conduct year-round Continuum of Care planning of homeless and homeless prevention housing and services.
- 2. Development and approval of annual actions plans for the CoC Strategic Plan. Planning oversight includes:

- a. Program development
- b. Implementation design
- c. Financing strategies
- 3. Review the CoC Strategic Plan annually and adjust as needed
- 4. Continuous review of CoC program performance through HMIS reporting
- 5. Receive bi-monthly reports from all standing committees, workgroups/taskforces and HMIS program.
- 6. Submit and present quarterly reports to the HOTHC Board of Directors.

All CoC Standing Committees will have an agreed-to charter and documented work plan. Standing Committees include the following:

- 1. Scoring/Ranking Committee
 - a. Reviews each renewing grants program and/or new project proposals, hears presentations by applicants and conducts site visits with each agency.
 - b. Recommends the methodology of prioritizing the grant programs for the CoC Program NOFA Application to the CoC Committee of the Board for approval.
 - c. Recommends the CoC Program NOFA Application priority rankings based on the determined prioritization methodology for approval of the CoC Committee of the Board.

Section Five: Continuum of Care Performance and Monitoring (24 CFR part 578.7(a))

Policy:

The TX-604 Waco/McLennan County CoC will:

- 1. Establish performance targets for each population and program type
- 2. Consult with CoC member agencies to establish:
 - Means of monitoring performance of CoC recipients and sub-recipients
 - b. Means of evaluating outcomes of both CoC and ESG recipients
 - c. Means of taking action against poor performers in an on-going fashion

Procedures:

Performance targets will include priorities of the U.S. Department of Housing and Urban Development (HUD) and community priorities and needs determined by CoC Standing Committees and the CoC Assembly and will include, but not be limited to, the following:

- 1. Increase the number of permanent housing beds dedicated for the chronically homeless.
- 2. Increase the percentage of homeless persons staying in permanent housing upon program exit to more than six (6) months.
- 3. Increase the percentage of homeless persons moving from transitional housing to permanent housing.
- 4. Increase percentage of homeless persons in employed at exit.
- 5. Increase percentage of homeless persons receiving other income sources.

- 6. Increase the percentage of participants in all CoC-funded projects that obtained mainstream benefits at program exit.
- 7. Decrease the number of homeless households with children.
- 8. Provide ongoing case management with 70% of client service goals accomplished for each client.
- 9. Ensure timely, accurate, and complete data entry into HMIS by the provider to produce Annual Progress Report (APR) and contribute data to the Annual Homeless Assessment Report (AHAR) and annual Point In Time (PIT) reports if the agency is not prevented, by law, from entering data (i.e. Violence Against Women's Act).

Performance will be monitored by the HMIS administrator, Collaborative Applicant, and the Independent Evaluation Committee.

Monitoring will include, but will not be limited to, the following:

- 1. HMIS Administrator will generate Report Cards monthly that include measurement of HMIS usage and CoC program performance criteria. Report cards will be sent to Agency Administrator and CoC Lead.
- 2. Grantees with failing HMIS grades must attend refresher training.
- 3. Grantees with failing or consistently low performance grades must meet with the HMIS Administrator and Collaborative Applicant to discuss ways to improve performance.
- 4. Grantees with consistently failing grades will be required to document an improvement plan.
- Grantees unable to improve HMIS usage and performance may have funds reallocated based upon a recommendation from the Independent Evaluation Committee and approval by the CoC Committee.

Section Six: Continuum of Care Coordinated Assessment (24 CFR part 578.7(a))

Policy:

In consultation with recipients of Emergency Solutions Grants (ESG) program funds within the geographic area, the Continuum of Care (CoC) will establish and operate a coordinated assessment system that will provide initial, comprehensive assessment of needs and can be easily accessed.

The CoC's specific coordinated assessment system will document the plan for addressing the needs of individual or families who are fleeing domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers.

The system will document a plan to coordinate the implementation of a housing and service system within the CoC's geographic area to meet the needs of homeless individuals (including unaccompanied youth) and families.

The system will encompass outreach, engagement and assessment; encompass shelter, housing and supportive services, and prevention strategies.

Procedures:

Core system concepts include, but are not limited to, the following mechanisms and procedures:

- 1. A uniform needs assessment tool.
- 2. Inclusion of an objective instrument to assess risk/prioritization of referrals.
- 3. A policy that will guide all grantees towards prioritization of referrals to ensure program entry is based on need and other prioritization factors.
- 4. Establishment of well advertised entry points in which clients experiencing a housing crisis may obtain services.
- 5. The customization of the HMIS data base to include effective assessment tools, eligibility information, and collection of needs, referrals, and services provided by Coordinated Access system.
- 6. Orientation and training for grantees and other staff in using the new tools.
- 7. Increased resources in responding to all help seekers with assessments.
- 8. The "Piloting" of any new technology and practice prior to full roll out.
- 9. Training for assessment staff.

Section Seven: Written Standards Around CoC Assistance (24 CFR part 578.7(a))

Policy:

In consultation with recipients of Emergency Solutions Grants (ESG) program funds within the geographic area, the Continuum of Care (CoC) has established and consistently follows written standards for providing CoC assistance. At a minimum, these written standards must include:

- 1. Policies and procedures for evaluating overall eligibility for CoC assistance and eligibility
- 2. Policies and procedures for evaluating eligibility for Transitional Housing assistance and for prioritizing which eligible individuals or families will receive TH
- Policies and procedures for evaluating eligibility for Rapid Re-Housing (RRH) assistance and for prioritizing which eligible individuals or families will receive RRH
- 4. Policies and procedures for determining and prioritizing which eligible individuals or families will receive Permanent Supportive Housing assistance
- 5. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid re-housing assistance

Procedures:

The CoC's written standards will:

- 1. Be specific and detailed.
- 2. Address any unique eligibility requirements for assistance (e.g., disability or subpopulation).
- 3. Reflect the homeless population and subpopulations within the CoC.
- 4. Reflect the housing and service resources available within the coC.
- 5. Reflect local and national targeting priorities.

To adapt written standards, the CoC Committee will review written standards on an annual basis, considering:

1. Provider feedback on the current written standards.

- 2. Program participant feedback on the intake process.
- 3. The effectiveness and appropriateness of housing and services for current program participants.
- 4. The CoC's success at meeting the performance standards in Section 427 of the McKinney-Vento Act.
- 5. Changes in the characteristics of the homeless population within the CoC.
- 6. Changes in the housing and service resources available within the CoC.

Overall Eligibility:

Case managers will use the Coordinated Access assessment tool and the Homeless Management Information System (HMIS) to conduct an initial evaluation to determine each individual or family's eligibility for assistance and the amount and types of assistance the individual or family may need to regain stability in permanent housing.

Determining Housing Eligibility:

- 1. For homeless families with children, a coordinated assessment tool will be used that will seek to mediate and/or prevent homelessness whenever possible, reduce the homeless episode for families through rapid re-housing (RRH) and shelter and/or transitional housing focused on moving families from homelessness to permanent housing as soon as possible, and permanently house the most vulnerable families, as resources are available. The uniform assessment tool will gather information to determine the appropriate intervention and assist in prioritizing families for more intensive services.
- 2. For individuals unaccompanied by children, a coordinated assessment tool will be used that will seek to mediate and/or prevent homelessness whenever possible, reduce the homeless episodes for the individual through rapid re-housing (RRH) and shelter/transitional housing focused on moving individuals from homelessness to permanent housing as soon as possible as resources are available. The uniform assessment tool will gather information to determine the appropriate intervention and assist in prioritizing individuals for more intensive services. If individuals are assessed and found not to be vulnerable and chronically homeless, they will be targeted for: transitional housing, permanent supportive housing, rapid re-housing, or income-based housing. Non-chronically homeless individuals who identify a substance abuse and/or mental health disorder and interest in receiving services for these concerns will be referred to the appropriate residential treatment programs.
- 3. For unaccompanied children, a coordinated assessment tool will be used that will seek to mediate and/or prevent homelessness whenever possible, reduce the homeless episodes through shelter and/or transitional housing focused on their needs. The uniform assessment tool will gather information to determine the appropriate intervention and assist in prioritizing the child for more intensive services.
- 4. For persons fleeing domestic violence, a coordinated assessment tool will be used to identify resources and provide referrals to appropriate services providers in order to prevent or limit lengths of homelessness. Victims of domestic violence that are in immediate danger or are seeking emergency shelter will be provided with the contact information and be encouraged to contact the Family Abuse Center hotline.

Order of Priority in Permanent Supportive Housing Projects Dedicated to Persons Experiencing Chronic Homelessness:

Please refer to Section III of HUD's Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Record Keeping Requirements for Documenting Chronic Homeless Status for detailed information about each prioritized population for Permanent Support Housing.

- 1. First Priority-chronically homeless individuals and families with the longest history or homelessness and with the most severe service needs
- 2. Second Priority- chronically homeless individuals and families with the longest history of homelessness
- 3. Third Priority-chronically homeless individuals and families with the most severe service needs
- 4. Fourth Priority- all other chronically homeless individuals and families

Order of Priority in Permanent Supportive Housing Projects NOT Dedicated to Persons Experiencing Chronic Homelessness:

- 1. First Priority- homeless individuals and families with a disability with the most severe service needs
- 2. Second Priority- homeless individuals and families with a disability with long period of continuous or episodic homelessness
- 3. Third Priority- homeless individuals and families with disability coming from places not meant for human habitation, safe havens, or emergency shelters
- 4. Fourth Priority- homeless individuals and families with a disability coming from transitional housing

Order of Priority in Transitional Housing Projects:

- 1. Individuals and families with heavy service needs to stabilize in housing.
- 2. Specific subpopulations of homeless individuals and families, including: Victims of domestic violence, dating violence, sexual assault, or stalking
- 3. Transition-aged youth (18-24)
- 4. Persons with a substance abuse disorder
- 5. Wrap around services will be designed to address the specific service needs of each subpopulation.

Order of Priority in Rapid Re-Housing Projects:

- 1. Individuals and families with higher barriers to housing, and higher service needs who are waiting to obtain another permanent housing subsidy (e.g., PSH).
- 2. Individuals or families with lower barriers to housing and less service need who are expected to stabilize in permanent housing with no additional assistance.

Standards for Determining Portion of Rent Paid by Participants:

1. Participants in rapid re-housing programs may be asked to pay up to 30% of their monthly adjusted income towards their rent.

- 2. Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the current Fair Market Rent limit, established by HUD.
- 3. The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.
- 4. The rental unit must meet minimum habitability standards.
- 5. There must be a rental assistance agreement and lease between the property manager and tenant as well as the owner of property and ESG sub-recipient.
- 6. No rental assistance may be made to an individual or family that is receiving rental assistance from another public source for the same time period.

Section Eight: Designate and Operate HMIS (24 CFR part 578.7(a))

Policy:

The TX-604 Waco/McLennan County CoC will:

- 1. Designate a single HMIS for the geographic area;
- 2. Designate a single eligible applicant as HMIS lead;
- 3. Review, revise, and approve privacy, security and data quality plans for HMIS;
- 4. Ensure HMIS administration is in compliance with U.S. Department of Housing and Urban Development (HUD) requirements;
- 5. Ensure consistent participation of program providers.

Procedures:

At this time, The City of Waco has been designated as the HMIS administrator for the CoC.

The CoC Committee will select an administrator for the Homeless Management Information System (HMIS) for the CoC. The CoC Committee will maintain an HMIS Governance Agreement with the HMIS Administrator. This agreement is reviewed annually and updated periodically. The administrator is eligible to apply for HMIS funds through the CoC grant process and other sources and will use these funds to dedicate staff and resources to the functions of the HMIS as specified by HUD guidelines.

The HMIS Advisory Committee a standing committee of the Heart of Texas Homeless Coalition advises and supports the Heart of Texas HMIS's operations in the following programmatic areas: quality assurance & accountability, resource development and consumer involvement. The committee meets quarterly.

- 1. Responsibilities of the HMIS Advisory Committee include but are not limited to:
 - a. Brainstorming the best uses for HMIS
 - b. Identifying and prioritizing system enhancements
 - c. Development and revision of HMIS policies and procedures
 - d. Establishing mechanisms for monitoring and/or enforcing compliance with policies and procedures

- e. User group chair/co-chairs may assist in the process of imposing sanctions on users/agencies for misuse of system
- 2. The Committee is fundamentally an advisory committee to the project.

Please refer to the Heart of Texas HMIS Policies and Standard Operating Procedures (PSOP) regarding privacy, security and data quality plans for HMIS.

The HMIS Administrator is responsible for the following:

- 1. Execute HMIS participation agreements
- 2. Monitor compliance with applicable HMIS standards on a regular basis including annual on-site monitoring with HMIS users.
- Maintain and update as needed the files for HMIS software to include software agreements, HUD Technical Submissions, HUD executed agreements and Annual Progress Reports
- 4. Develop and maintain HMIS agency files to include signed participation agreements, user license agreements and all other signed agreements pertaining to HMIS
- 5. In conjunction with the HMIS Advisory Committee, review and update HMIS Policy and Standard Operating Procedures Manual (PSOP) annually. The PSOP manual should include: HMIS data quality plan, privacy policy, and security plan.
- 6. Provide new user training and quarterly refresher trainings.
- 7. Provide on-site technical support to agencies using HMIS for trouble-shooting and data input
- 8. Monthly review of HMIS data and bed lists to ensure that participating agency programs are using HMIS accurately
- 9. Provide assistance to agencies upon request for additional on-site training and support
- 10. Lead planning efforts for the annual Point In Time Count
- 11. Complete ,in conjunction with CoC Lead and CoC Committee, Annual Homelessness Assessment (AHAR), Point In Time (PIT), Housing Inventory (HIC), and Annual Performance Report (APR)

Section Nine: Continuum of Care Plan (24 CFR part 578.7(b))

Policy:

The TX-604 Waco/McLennan County CoC will develop and maintain a plan that includes:

- 1. Coordinating the implementation of a housing and services system, to include:
 - a. Outreach, engagement, and assessment
 - b. Shelter, housing, and supportive services
 - c. Prevention strategies
- 2. An annual Housing Inventory Chart (HIC) and a point-in-time (PIT) count for homeless persons who are unsheltered and sheltered, including emergency shelters, transitional housing, permanent supportive housing and rapid re-housing.
- 3. An annual gaps analysis.
- 4. Collaborating with agencies responsible for developing Consolidated Plans.
- 5. Consulting with Emergency Solutions Grant (ESG) recipients about the allocation of ESG funding, evaluation of ESG grants and reporting on the performance of ESG recipients, sub-recipients and sub-sub recipients.

Procedures:

The CoC provides continuous planning and coordination of services through the CoC Committee and the CoC Standing Committees whose core functions include ensuring that individuals and families experiencing homelessness have appropriate choices in the following area:

- 1. Unsheltered outreach
- 2. Emergency shelter
- 3. Transitional housing
- 4. Rapid re-housing
- 5. Permanent Supportive Housing
- 6. Safe Havens
- 7. Addressing the needs of subpopulations including, but not limited to, unaccompanied youth, persons with disabilities, and those fleeing domestic violence

The CoC Strategic Plan incorporates the strategies in the *Mayor's 10 Year Plan to End Chronic Homelessness* developed in 2005. Each year the CoC and HMIS Lead agency sends the Point In Time, Housing Inventory County, gaps analysis and unmet need data to assist with the development of the Consolidated Plan.

The CoC's Strategic Plan will be reviewed and updated as appropriate by the CoC Committee on an annual basis.

The CoC Lead will facilitate meetings with ESG recipients to recommend housing and service priorities, identified by the CoC, for funding allocation. The CoC Lead reviews ESG recipients' performance reports from the ESG sub-recipients to assess compliance with the CoC's priorities and progress toward the projects' stated goals.

Section Ten: Continuum of Care Annual Application

Policy:

The TX-604 Waco/McLennan County CoC will document processes for the following:

- 1. Setting funding priorities
- 2. Facilitating a collaborative process for the development of applications
- 3. Approving the annual submission of applications

Procedures:

The CoC will use an independent evaluation committee (Scoring/Ranking Committee), a CoC Standing Committee, and the CoC Lead Agency (City of Waco) staff to execute the annual CoC Program application:

1. The CoC Scoring/Ranking Committee consisting of up to 7 volunteer members, who have no direct relationship with the renewing grantees or any new proposed projects, will perform an annual review of each renewing or newly proposed program grant, hear presentations by potential grant applicants regarding programs and/or conduct site visits at each agency.

- a. Program performance is based on assessment completed by the Scoring/Ranking committee and Collaborative Applicant staff. Scoring criteria are based on program performance measurements required by HUD and local community priorities.
- b. Financial performance is based on a review of audited financials for the nonprofits and bond ratings of the governmental entities.
- c. The Scoring/Ranking committee develops the methodology for use in prioritizing the grant programs and notifies the CoC Committee.
- d. The Scoring/Ranking committee develops the grant priority ranking for the annual CoC Program grant and notifies the CoC Committee.
- e. Scoring/Ranking and Reallocation Tools and Policies are reviewed and approved by the Scoring Ranking Committee annually.
- f. The committee operates year round.
- 2. The Collaborative Applicant handles the process for developing newly proposed project applications as well as the process for renewing grants.
 - a. For a new project application the process is as follows:
 - i. Communicate verbally to CoC Committee an interest in applying for funding.
 - ii. Complete the Request for Application (RFA) and submit by the due date.
 - iii. Meets/presents to the CoC Committee.
 - iv. If project is selected by the Scoring/Ranking Committee, participation in all mandatory meetings related to application process is required.
 - v. All deadlines determined by CoC Lead for submission of the Project Application in e-snaps must be met.
 - vi. Agree to full participation in the HMIS system for all clients and timely payment of HMIS fees related to HMIS use, if applicable.
 - b. Renewal Project Application Submission
 - i. Participation in all mandatory meetings related to the NOFA application process is required.
 - ii. Submit all requested organizational documents.
 - iii. Provides presentation to and may host site visits for the CoC Committee as requested by the reviewers.
 - iv. All deadlines determined by CoC Lead for submission of the Project Application must be met.
 - c. CoC funding priorities in priority order are:
 - i. HMIS grant
 - ii. Permanent Supportive Housing (PSH) grants
 - iii. Rapid Re-Housing (RRH) grants
 - iv. Reallocations to permanent housing (e.g., PSH or RRH) grants

v. Transitional Housing grants

d. Project Ranking and Reallocation Policy

On an annual basis, the Heart of Texas Continuum of Care is required to rank all new and renewal projects submitted to HUD for funding in an order that reflects the CoC's needs and priorities. Additionally, HUD requires CoCs to review the performance of all funded projects and seek to reallocate funding away from low performing projects or those providing services that are of a lower priority in preventing and ending homelessness.

The Heart of Texas CoC is seeking to accomplish the following in the ranking and reallocation of projects:

- Incentivize all providers to focus on outcomes and to seek to achieve the performance targets specified by the CoC.
- Encourage providers to adopt evidence based practices including Housing First to more effectively employ CoC resources.
- Replace projects that are not high performing or following evidence based practices with new projects that follow CoC and HUD priorities.

Procedures:

All new and renewal projects will be ranked by the CoC. The primary factor controlling the ranking of projects will be the scores assigned to renewal and new projects. Scoring is based on project performance, grant management, community outcomes, and adherence to policy priorities. Except as specified below, projects will be ranked in the NOFA competition by the scores assigned to renewal or new projects.

There are two categories of projects that will not be ranked according to performance scores:

- Projects that are essential to the operation of the CoC. This includes funding for HMIS and Coordinated Entry. These are unique projects focused on CoC operations and that cannot be readily evaluated or compared to other CoC funded projects. Failure to renew this funding would have negative consequences for the CoC and jeopardize future funding opportunities.
- First time renewal of newly funded grants. HUD requires newly funded one-year project grants to be renewed in the competition. In most instances, these projects will have not yet started operations. In other instances, the projects have just started but are far from being able to report on a full year of operations in the APR.

The two project types identified above will not be assigned scores. These projects will be ranked by the CoC to assure – to the maximum extent possible – that they will be funded in the competition. Subject to review based on the actual NOFA, these projects will be ranked at the bottom of Tier 1, with all of their funding above the Tier 1/Tier 2 demarcation. All other CoC projects will be ranked according to scores:

• Renewal projects will be ranked according to adjusted renewal project score. Renewal scores will be adjusted as follows: if the highest scoring renewal project scores less than 200

points, then all renewal scores will be adjusted upward by the difference between the highest scoring renewal project and 200. Renewal projects that qualify for renewal based on the renewal performance evaluation will be ranked above new projects.

New projects will be ranked according to scores.

Current CoC grantees may elect to reallocate some or all of the funding associated with their project. These reallocated projects will be scored as new projects and ranked according to score the same as all new and renewal projects. CoC grantees in good standing (no outstanding HUD or CoC monitoring findings and no open audit findings) may voluntarily reallocate their funding and will not have to compete with other organizations for that funding.

The minimum score for automatic renewal of CoC funded projects is 65% of the highest scoring project.

If the highest scoring project receives a score of 200, then all projects scoring below 130 will be reallocated unless a Project Improvement Plan has been submitted and approved by the CoC board. Should the highest scoring project receive a score of 190, then the minimum acceptable score would be 123.5.

The Project Improvement Plan must specify how the project will improve performance and meet standards in the upcoming year. If the CoC board accepts the Project Improvement Plan, the grantee will be allowed to apply for renewal funding.

Any legal applicant for CoC funds can apply for new projects from the bonus pool or the uncommitted reallocation pool. The CoC will only rank new projects for which there is sufficient funding in the new or reallocation pool to fully fund the project.

Policy on Expenditure of Grant Funds:

Funds unexpended at the completion of the grant term are recaptured by HUD. In some instances these funds are then allocated to other CoCs or in other cases are returned to the federal treasury. The Heart of Texas CoC seeks to minimize this recapture of funding and to the maximum extent possible ensure that homeless assistance funding allocated to the City of Waco is used to support homeless people in the city.

Underexpenditure Policy:

It is the policy of the Heart of Texas CoC that CoC funds granted to an applicant agency will either be fully expended to assist eligible homeless people or the CoC will recapture the unspent funding and add it to the pool of resources available for reallocation. Heart of Texas CoC grantees that expended less than 90% of their funding in the most recent grant year will face recapture of unexpended funding that exceeds 10% of the grant funds. If, for example, the CoC grant was for \$100,000 and \$85,000 was expended, the grantee would see \$5,000 in funding recaptured. Recapture of unexpended funding that exceeds 10% of the total grant will be automatic. The Scoring/Ranking Committee may consider extenuating circumstances regarding projected expended funds. For example, an agency had staff

vacancies at the beginning of the grant cycle and all vacancies have been filled later in the grant cycle altering the capability of the program to serve greater number of clientele which would increase projected expenditures. The applicant must put any considerations based on circumstance in writing to the Scoring/Ranking Committee.

Grantees may also prevent this automatic recapture by submitting an appeal to the Board of the CoC. The appeal will need to: explain the reason for the under-expenditure and provide a plan for fully expended the grant in the current cycle. The Board may approve the request at its discretion. However, if the funds are restored and under-expended in the subsequent grant cycle funding will be recaptured as indicated above. All CoC board decisions can be appealed but a second appeal would require extraordinary circumstances to be approved.

e. CoC Lead is responsible for the review of the recommendations from the CoC Scoring/Ranking Committee related to the annual submission of the CoC Program Application and the Grant Priority Ranking. This review is to ensure CoC policies and HUD requirements are met.

Section Eleven: Continuum of Care Planning

Policy:

The TX-604 Waco/McLennan County CoC will document the following planning procedures:

- 1. Determining the geographic area of the CoC
- 2. Development and facilitation of a community-wide CoC planning process
- 3. Developing a CoC housing and service system
- 4. Evaluation of outcomes for CoC programs and ESG programs
- 5. Monitoring grant recipients and sub-recipients
- 6. Providing training and technical assistance
- 7. Preparing and submitting an application to the U.S. Department of Housing and Urban Development (HUD)
- 8. Conducting a sheltered and unsheltered Point-in-Time (PIT) Count
- 9. Collecting of housing data to prepare the Housing Inventory Count (HIC) report

Procedures:

Establish Continuum of Care Geographic Area:

TX-604 Waco/McLennan County Continuum of Care (CoC) shall serve the geographic area of McLennan County, Falls County, Bosque County, Hill County, Limestone County, and Freestone County, Texas as recognized by the U.S. Department of Housing and Urban Development (HUD).

Community-wide CoC Planning Process & Continuum of Care System:

TX-604 Waco/McLennan County CoC promotes comprehensive and coordinated approaches to housing and community resources for individuals and families who are homeless or at risk of homelessness through, but not limited to, the following:

- 1. Prevention
- 2. Outreach services
- 3. Emergency shelters and supportive services
- 4. Transitional housing and supportive services
- 5. Permanent supportive housing
- 6. Rapid Re-housing
- 7. Enrollment in mainstream resources
- 8. Skills training
- 9. Employment counseling
- 10. Discharge planning

The CoC is comprised of several volunteer committees and workgroups/taskforces which have various CoC planning roles and responsibilities. These committees include, but are not limited to, the following:

1. CoC Committee

- a. CoC Committee is comprised of providers of housing and services to the homeless and advocates who give input and help shape CoC planning.
- b. Voting members of the CoC Committee elect the Chair who serves two-year terms.
- c. The CoC Committee convenes at least six times annually and may convene for special meetings when needed.
- d. CoC Committee members also serve on standing committees, sub-committees, and workgroups/taskforces
- e. Responsibilities of this committee are outlined in Section 2

2. Project Homeless Connect/PIT Committee:

This committee is responsible for planning and fundraising related to the annual Project Homeless Connect Event which connects homeless individuals/families with community resources. The event is held the last Thursday of January in conjunction with the annual Point In Time Count (PIT). This committee in collaboration with the HIMS Lead also oversees the planning of the annual Point In Time Count (PIT).

3. HMIS Advisory Committee:

The Advisory Committee advises and supports the Heart of Texas HMIS's operations in the following programmatic areas: quality assurance & accountability, resource development and consumer involvement. The committee meets monthly for the first three months at which time HMIS issues can be raised for discussion and/or approval. The Committee will meet quarterly thereafter.

The responsibilities of this committee include but are not limited to:

- a. Brainstorming the best uses for HMIS
- b. Identifying and prioritizing system enhancements

- c. Establishing mechanisms for monitoring and/or enforcing compliance with PSOP
- d. User group chair/co-chairs may assist in the process of imposing sanctions on users/agencies for misuse of system
- e. This committee is fundamentally an advisory committee to the project.

Section Twelve: Emergency Solutions Grant (ESG) Administration

Policy:

The TX-604 Waco/McLennan County CoC will maintain written policies and procedures that document:

- 1. Budgeting the costs to the Collaborative Applicant of administering ESG funds from TDHCA
- 2. Allocating ESG funds, including ESG funds for administrative costs and for HMIS
- 3. Selecting ESG sub-sub recipients (TDHCA is the ESG recipient, the Collaborative Applicants are the sub recipients, and entities under the Collaborative Applicant are sub-sub recipients)
- 4. Training and monitoring sub-sub recipients
- 5. Collecting performance and expenditure data from sub-sub recipients and aggregating it to reflect all State ESG programs within the CoC
- 6. Reporting performance and expenditure data to TDHCA
- 7. Receiving reimbursements from TDHCA and disbursing reimbursements to sub-sub recipients

Procedures:

Collaborative Applicant Costs:

The CoC's Collaborative Applicant will administer the Emergency Solutions Grant (ESG) funds that the CoC receives from the Texas Department of Housing and Community Affairs (TDHCA). In consultation with the CoC Committee, the Collaborative Applicant will develop a budget that itemizes and details grant administration costs. The Board of Directors of the Collaborative Applicant will approve the final budget.

Allocation of Emergency Solutions Grant (ESG) Funds:

Priority is given to programs that:

- 1. Benefit chronically homeless persons, meet the needs of local communities, are cost-effective, have participation by the public and private sector, are part of the Continuum of Care process and address problems of health, safety, and welfare.
- Move persons experiencing homelessness from shelters and off the streets into decent, safe, and affordable housing and provide supportive services to promote housing retention and improve or maintain quality of life.

Funding allocation will include costs associated with HMIS implementation.

Selection of ESG Sub-Sub Recipients:

1. Applicants must actively participate in communitywide planning efforts to ensure the strategic use of resources by all providers of homeless services.

- 2. Prior to submitting an application, applicants must discuss their proposed ESG projects with their CoC and must submit with their application completed "Certificate of HMIS Usage", "Certificate of Participation", and "Certification of CoC Coordination" documents.
- 3. Applicants shall ensure the following housing services for individuals/families are available:
 - a. For those homeless individuals and families in need of housing, appropriate housing that meets the needs of the homeless individual or family (e.g., rapid re-housing, permanent housing, permanent supportive housing, or single-room occupancy), combined with supportive services, shall be provided to maintain residential and personal stability (e.g., subsidized rent, case management services, nursing care, mental health care management, substance abuse treatment).
 - b. For those homeless individuals or families placed in rapid re-housing, permanent housing or permanent supportive housing, ESG recipients/sub-recipients shall assist the client in locating suitable, affordable housing, assist with housing applications and lease negotiation, application fees, first and last month's rent, short-term rental subsidies, furniture stipends, utility deposits, back payments, emergency payments, start-up household supplies and furnishings, start-up food and grocery supplies, transportation assistance, and clothing, when necessary or applicable.
 - c. For homeless individuals or families placed in emergency shelters, rapid re-housing, permanent housing, permanent supportive housing, single-room occupancy, or affordable housing, ESG recipients/sub-recipients will ensure housing is safe and decent, meeting housing quality standards established by the Federal regulations.
- 4. Recipients/sub-recipients shall provide quality supportive services that meet accepted standards of care. At minimum, recipients/sub-recipients must provide or have access to the following supportive services:
 - a. Participate in a coordinated outreach and intake system that serves homeless individuals and families designated by the CoC;
 - b. Perform a comprehensive, coordinated assessment of current psycho-social, health (including mental health and substance use/abuse), and employment/education conditions;
 - Perform an individualized service/treatment plan developed for all clients describing a client's needs for supportive services and, if necessary, establishing a service/referral plan;
- 5. Provide minimum supportive services that will include, but not be limited to:
 - a. Comprehensive assessment upon enrolling into the ESG Program
 - Case management of individuals and family members enrolled in an ESG program that includes home visits to ensure housing stability and address the needs of their clients and provide the level of service expected of ESG funded case management,
 - c. Assistance for enrolling in benefit programs,
 - d. Medical and mental health treatment,
 - e. Substance abuse treatment,
 - f. Education/vocational training,
 - g. Job counseling/training/job placement,
 - h. Child care, and
 - i. Transportation necessary to maintain permanent housing;

6. All sub-recipients are expected to provide appropriate level of supportive services to clients for the full time necessary to stabilize that client and provide for the likelihood of positive housing outcomes after assistance. A client is eligible to receive assistance up to the full 24 months in a three (3) year period as determined by the certification process required for all ESG clients.

Program Training and Monitoring:

The proposed outcomes below are developed from HMIS data elements and will be used as the basis for monthly performance reporting. At minimum, applicants will be evaluated based on their performance against these outcomes.

Collecting performance and expenditure data from sub-sub recipients and aggregating it to reflect all State ESG programs within the CoC will include, but not be limited to:

1. Street Outreach

- a. Number of persons placed in shelter or Safe Havens
- b. Number of persons with more non-cash benefits at program exit
- c. Number of persons receiving case management

2. Emergency Shelter

- a. Number of persons exiting to temporary/transitional housing destinations
- b. Number of persons exiting to permanent housing destinations
- c. Number of persons receiving case management

3. Homeless Prevention

- a. Number of persons who maintained their permanent housing for three months
- b. Number of persons exiting to permanent housing destinations
- c. Number of with higher income at program exit
- d. Number of persons with more non-cash benefits at program exit
- e. Number of persons receiving case management

4. Rapid Re-housing

- a. Number of persons who maintained their permanent housing for three months
- b. Number of persons exiting to permanent housing destinations
- c. Number of persons with higher income at program exit
- d. Number of persons with more non-cash benefits at program exit
- e. Number of persons receiving case management

Monitoring will include the following which are federal requirements:

- Formal and advance notification of on-site visits
- Pre-visit preparation based on review of existing information
- Records related to monitoring reviews
- Review of sub-recipient Policy and Procedure Manual and requirements
- Assurance that ESG funds are being utilized as originally planned and are for the eligible activities
- Determination whether costs are properly classified and if spending limits on certain activities have been properly adhered to
- Review and check that financial regulations and management requirements are appropriately being followed e.g. financial records, reports or audits

- Assurance that program disbursements or drawdown funds are in compliance with all requirements
- · Review of client record file
- Notation of any changes in the use of ESG fund or any other isues

Reporting performance and expenditure data to TDHCA:

TDHCA requires monthly performance and expenditure reports to be submitted in the TDHCA Community Affairs Contract System before the 15th of each month which will be submitted timely by the HMIS Administrator.

Receiving reimbursements from TDHCA and disbursing reimbursements to sub-sub recipients:

Upon approval of funding and implementation of the programs funded under ESG, HOTHC requires that partner agencies submit invoices for funding reimbursements no later than the 10th of each month. Each request for reimbursement is reviewed for eligibility of expenditures, accuracy, and documentation of eligible homeless status per the McKinney-Vento homeless definition.

Each request for reimbursement is reviewed by the following:

Chair of HOTHC Board of Directors
Treasurer of HOTHC Board of Directors

Reimbursement comes via direct deposit to HOTHC from TDHCA following approval of the expenditures reported in the Community Affairs Contract System.

HOTHC will issue timely payments for reimbursement after receipt of funds from TDHCA

Section Thirteen: Access and Security

Policy:

- 1. To obtain eLOCCS access staff are required to submit:
 - a. Form HUD-27054, LOCCS Voice Response System Access Authorization Form https://portal.hud.gov/hudportal/documents/huddoc?id=27054.pdf
 - b. Rules of Behavior Form "Exhibit A"
- 2. Forms are to be submitted to the President of the Heart of Texas Homeless Coalition.

Appendix A

TX 604 Waco/McLennan County CONTINUUM of CARE (CoC)

Code of Conduct, Conflict of Interest And Recusal Policies Form

Purpose

The purpose of the Code of Conduct, Conflict of Interest, and Recusal Policies is to maintain high ethical standards and establish procedures which guide the recusal process and administrative or disciplinary actions for violations. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

Conflict of Interest

An officer, member, member of a committee, agent or hired staff, including staff hired through MOU or Pass Through Agreement, with governing board delegated powers must disclose the existence of possible direct or indirect financial, or material gain to the governing board or committee with governing board delegated powers. This includes real or apparent conflicts of interest that may arise among officers, employees or agents, or any member of his or her immediate family, his or her partner or an organization that employs any of the indicated parties. This includes organizational conflicts of interest.

After disclosure, he/she may choose to voluntarily relinquish voting rights or abstain from serving on a committee relevant to the award of grants, provision of financial benefits, transaction or arrangement. If further determination is warranted, he/she shall leave the governing board or committee meeting while determination of a possible conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

If a conflict of interest exists, the individual with the association will be required to abstain from voting or serving on a committee with governing board delegated powers.

If the governing board or committee has reasonable cause to believe an officer or committee member has failed to disclose actual or possible conflicts of interest, it shall inform the individual of the basis for such belief and afford the individual an opportunity to explain the alleged failure to disclose. If, after hearing the individual's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action which could include ensuring the individual with the association abstains from voting or serving on a committee with governing board delegated powers up to dismissal of the individual from board or committee membership.

Acceptance of Gifts or Favors

An officer, member, member of a committee, agent or employee, including staff hired through MOU or Pass Through Agreement, may neither solicit nor accept gifts or gratuities, favors or anything in excess of minimum value from potential grant awardees, contractors, or parties to sub agreements where the receipt would either compromise impartial performance or give the appearance of compromising impartial performance.

If the governing board or committee has reasonable cause to believe an officer, committee member, agent or employee has violated this policy, it shall inform the individual of the basis for such belief and afford the individual an opportunity to explain the alleged violation. If, after hearing the individual's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has violated policy, it shall take appropriate disciplinary and corrective action which could include dismissal of the individual from board or committee membership.

Fraud Intolerance

The term fraud refers to, but is not limited to: intentionally entering false or erroneous information into electronic software systems; any dishonest or fraudulent act; forgery or alteration of any official document; misappropriation of funds, supplies, or Continuum of Care materials; improper handling or reporting of money or financial transactions; profiting by self or others as a result of inside knowledge; destruction or intentional disappearance of records, furniture, fixtures, or equipment; accepting or seeking anything of material value from vendors or persons providing services or materials to the Continuum of Care for personal benefit; or any similar or related irregularities.

Fraudulent acts will not be tolerated and may result in termination from Board membership. Fraudulent acts will be pursued to the fullest extent and may result in criminal charges.

A Board Member who has reason to believe that there may have been an instance of fraud, improper action, or other illegal act in connection with a Continuum of Care program, function or activity shall report it immediately to the TX 604 HOTHC Board.

Improper actions are actions undertaken by a Board Member in the performance of their official duties that: (a) are in violation of any federal, state, or local law; or (b) constitute an abuse of authority; or (c) create a substantial, specific danger to public health or safety; or (d) misuse of Continuum of Care funds; or (e) represent a conflict of interest.

Reported incidences will be investigated as expeditiously as possible by the Governance Committee and/or Governance Committee Co-Chair members as appropriate. When an investigation confirms that fraud or an illegal act(s) has occurred, appropriate corrective action will be taken.

I accept the terms of this Code of Conduct,	Conflict of Interest and Recusal Policies and understand that failure to
comply with it may result in dismissal from	the Board and appropriate legal action.

Signature	 Date	-

Appendix B

TX 604 Waco/McLennan County CONTINUUM of CARE (CoC)

Heart of Texas Homeless Coalition Bylaws

Appendix C

Rules of Behavior for HUD Systems

The U.S. Department of Housing and Urban Development has granted access to you to utilize the Department's automated information resources. However, as a condition of receiving this access, you are required to be aware of the Department's system security policies and to abide by these policies. Security policy emphasizes awareness practices for the purpose of safeguarding the Department's valuable information resources.

The system user identification (USERID) and password issued to you are your means to access these resources. They are to be used solely in connection with the performance of your responsibilities as set forth in your job description, contract or agreement(s) with the Department. Use by anyone other than yourself is expressly prohibited. You agree to be responsible for the confidentiality of the assigned information and accountable for all activity with your user identification (USERID). Further, you agree that you will not provide this confidential USERID/password to another user nor will you sign on to HUD systems so that another person may access or operate the workstation in your absence or on your behalf. Actions of this type constitute a breach of system security and will result in immediate termination of your assigned USERID/password from the system.

In addition, you agree to:

- (a) Log-off the system when leaving the system/workstation area;
- (b) Refrain from leaving written passwords in the workstation area;
- (c) Avoid creating a personal password that can be easily associated with you;
- (d) Avoid posting printouts of sensitive output data on bulletin boards;
- (e) Avoid leaving system output reports unattended or unsecured;
- (f) Control input documents by returning them to files or forwarding them to the appropriate contact person in your office;
- (g) Avoid violation of the Privacy Act which requires confidentiality of personal data contained in government and contractor data files;
- (h) Immediately contact the HUD Inspector General's Office, as appropriate, regarding any suspected violation or breach of system security;
- (i) Cooperate in providing personal background information to be used in conducting security background checks to the extent required by Federal regulations;
- (j) Respond to any inquiries and requests for information you may receive from either the HUD Headquarters or management officials regarding system security practices.
- (k) Protect all electronic/optical media and hardcopy documentation containing sensitive information and properly dispose of it by shredding hardcopy documentation, or by contacting the HITS Help Desk to dispose of electronic/optical media.
- (I) Avoid saving sensitive HUD information on the local drive of a laptop, personally owned computer, or other mobile or portable technology ("flash drives", removable/external hard drives, etc.).
- (m) If sensitive data must be stored on any type of HUD-approved mobile/portable technology (laptops, removable hard drives, "flash drives", etc.), ensure that it is protected via encryption.
- (n) Individuals who telework or remotely access HUD information should do so only through approved remote access solutions (such as hudmobile.hud.gov), and should safeguard all sensitive information accessed in this manner

Name (Signature)	Name (Printed)	Date	
Organization/Agency Represented			

Heart of Texas

Homeless Management Information System

Policies

and

Standard Operating Procedures

Last Revision Date May 2017

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Summary of Policies and Procedures For Users

Policy	Procedure	Section Reference for Description
User Licenses: All users must sign a User Confidentiality Agreement before accessing the HoT HMIS.	The Agency Administrator must give each user a copy of the HoT HMIS Policies & Standard Operating Procedures and ensure that the user has been properly trained in both the Policies & Standard Operating Procedures and the HoT HMIS software before a user is granted access to the system. A signed copy of the user agreement is to be kept on file at the office of the HoT HMIS Administrator.	User access Levels Section A.4 Ethical Use of Data User Agreements Section A.9
	The Agency Administrator is required to revoke the user license and access of any user upon termination of employment and immediately notify HoT HMIS Administrator.	User Licenses Section B.2
Communication: Users are responsible for communicating any and all problems or concerns about the HoT HMIS to his/her Agency Administrator.	It is required that each agency designate a staff person to act as the Agency Administrator. The Agency Administrator, who receives special training, should receive questions from his/her users. When a question cannot be answered by the Agency Administrator or if the Agency Administrator is unavailable, he/she may call upon the HMIS Administrator.	Communication Sections A.5 and A.6
Data Sharing: HoT HMIS is operated under an open data sharing system.	HoT HMIS operates as an open system; electronic data sharing between agencies is permitted and encouraged. Therefore, a Release of Information (ROI) is required for each client entered into the system.	Data Sharing Section A.8
	Users that are found to be inappropriately accessing and/or sharing client records will have their access to the HoT HMIS immediately terminated.	Profile Information Section C.4

Policy	Procedure	Section Reference for Description
Client Rights, Consent, and Ethical Use of Data: Each agency and user must abide by the terms of the agency privacy policy and the HoT HMIS Policy & Standard Operating Procedures.	Personal information collected about the persons served within programs should be protected at all times. Misuse of this data can result in the termination of access to the HoT HMIS and/or personnel action by the agency or client.	Ethical Use of Data Client Rights and Consent Sections A.9 and A.11
Operating Procedures.	Each agency must have a privacy posting at the point of intake for review by clients. The HoT HMIS also requires the client to read and sign the ROI. Client refusal to provide information or otherwise participate in HMIS shall not be reason to deny eligibility or services.	Client Consent Section D.2 (Attachment C)
Data Removal, Review and Grievances: A client may request to see their HMIS data or may request that personally identifying information be removed from the HMIS.	Clients may follow the Agency's Grievance policy on issues related to HMIS. Grievances related to HMIS that cannot be addressed at the agency level may be escalated in writing to the HoT HMIS Committee or HoT Homeless Coalition.	Client Grievances Section A.13
the timis.	In response to a legitimate request from a client to remove his/her personally identifying information from the HMIS, the agency should remove such data from the client record within 72 hours. A record of these transactions must be kept by the Agency Administrator. In response to requests to view his/her data in the HMIS, the agency administrator or case manager must provide a copy of the requested data within a reasonable time frame to the client. Requests for changes to client information are considered on a case by case basis.	Data Retrieval, Client Section D.11
Security and User Access: Each user is provided with a unique user name and password.	Sharing of user names and passwords is prohibited in the HoT HMIS. Sharing of user name and/or passwords is considered a serious breach of the user agreement and could result in sanctions and/or appropriate personnel action.	Security Section B.1 (Attachment B)

Policy	Procedure	Section Reference for Description
Security and Data Retrieval: Agencies must protect identified data that is downloaded or retrieved from the HMIS onto local computers and/or networks.	Once identified data has been retrieved from the HMIS and saved to a PC, network or disk, the data must be kept secure through encryption and/or password protection. Storing identified data on floppy disks, CDs, flash drives or unprotected laptops is not recommended unless proper security precautions have been taken. Unencrypted or unprotected data from the HMIS may not be sent via email.	Extracted Data Section B.5
Security Requirements for Agencies: Because the HoT HMIS is accessed over the internet and contains personal data that must be protected, each agency is required to follow a minimum set of guidelines to ensure security of the entire system.	Each agency must have appropriate protections in place on the network and/or stand-alone PC that accesses the HoT HMIS.	Data Access Computer Requirements Section B.6
Training: User training on a variety of HMIS topics is offered on a quarterly basis.	Although initial user training is to be conducted by the HMIS Administrator, a schedule of user training sessions on a quarterly basis in a classroom style setting is offered. Contact the HoT HMIS Administrator for the schedule of trainings available.	Training: Section C.5
Data Collection and Data Quality: Each program is required to collect a series of data elements depending on the type of program it operates. The HoT data elements are based on HUD's Data and Technical Standards. Data entry must meet the data quality thresholds to be considered complete.	Each program must have all the required data elements in the HoT HMIS weekly. Data entry for the previous week must be completed on the following Monday. Data quality and integrity is expected of all HMIS users. The HMIS Administrator may perform data quality reviews and require corrective action if data quality does not meet required standards. HUD-funded programs are required to submit an HMIS-generated APR every quarter.	Required Data Collection: Section D.1. (Attachment E) https://www.hudexchange.info /resources/documents/HMIS- Data-Standards-Manual.pdf

Program-specific HMIS Manuals	PATH Program HMIS Manual: https://www.hudexchange.info /resources/documents/PATH- Program-HMIS-Manual.pdf
	CoC Program HMIS Manual: https://www.hudexchange.info /resources/documents/CoC- Program-HMIS-Manual.pdf
	ESG Program HMIS Manual: https://www.hudexchange.info /resources/documents/ESG- Program-HMIS-Manual.pdf
	RHY Program HMIS Manual: https://www.hudexchange.info/resources/documents/RHY-Program-HMIS-Manual.pdf
	HOPWA Program HMIS Manual: https://www.hudexchange.info /resources/documents/HOPWA- Program-HMIS-Manual.pdf
	VA Programs HMIS Manual: https://www.hudexchange.info/resources/documents/VA-Programs-HMIS-Manual.pdf

Heart of Texas Homeless Management Information System (HoT HMIS)

Policies and Standard Operating Procedures

This document details the policies, procedures, guidelines, and standards that govern the operations of the Heart of Texas Homeless Management Information System (HoT HMIS). It outlines the roles and responsibilities of all agencies and persons with access to HoT HMIS data, and it contains important and useful information about the ways in which HoT HMIS data is secured and protected. All Providers using the HoT HMIS should read this document in full and train every end user within its agency and programs to understand its contents as necessary. Attachment B is a user license agreement, which includes a statement that the user has read and understands these operating procedures.

Introduction:

The Heart of Texas Homeless Coalition (HoTHC) is a non-profit organization whose vision is stated as: "There will be no gaps in available services to homeless or otherwise qualifying individuals." The Coalition is committed to developing a seamless Continuum of Care model that will provide all homeless individuals an opportunity to access needed services. The City of Waco is the entity that provides HMIS support to the Heart of Texas Homeless Coalition and homeless provider agencies. The HoTHC and CITY OF WACO have established a Memorandum of Understanding (MOU) to provide and manage the HMIS for the HoT. The HoTHC and the HMIS Administrator in conjunction with the local Continuum of Care (CoC) strive to meet or exceed HUD standards in data accuracy.

HUD requires unduplicated statistical demographic reports on the numbers and characteristics of clients served as well as on program outcomes. In order to address the reporting requirements mandated by HUD, the HoT has implemented an electronic management information system that will provide the necessary demographic information and reports. This system is called the Heart of Texas Homeless Management Information System (HoT HMIS). Bowman Systems, L.L.C. is the vendor of the web-based software known as *ServicePoint*, which was selected in 2001 as part of a competitive process. The HMIS Administrator provides training and technical assistance to users of the HoT HMIS. All Providers funded by the City of Waco's Community Development Block Grant (CDBG) or that receive certain HUD grants are required to participate in the HoT HMIS. The only exception being domestic violence shelters which are prohibited by law from HMIS participation.

Providers participating in the HoT HMIS are required to collect and record certain data elements for all new and continuing clients in the HMIS weekly. Data entry should be completed weekly. All records should be up to date every Monday for clients served during the prior week. All Providers using the HoT HMIS are also required to comply with HUD's HMIS Data and Technical Standards (see Attachment E for an UDE overview and access to a full copy of HUD's Standards).

Maintaining confidential client records in a secure environment to ensure that the information is not misused or accessed by unauthorized people is of the utmost importance. The following Policies and Standard Operating Procedures have been

developed to establish standards for the collection, storage and dissemination of confidential information by the users of the HoT HMIS. The HoT HMIS is an open system which does allow for sharing of electronic data between agencies. Programs can share information entered into the HoT HMIS. The HMIS Administrator is the only entity able to access all the client-level information, including personal identifiers, contained in the HoT HMIS. Acceptable uses and disclosures of the data are outlined in this manual. For example, City of Waco may disclose data that is required under a court order issued by a judge, to protect the health and safety of those being served in its programs, and could use de-identified data for research and analysis purposes. Neither the City of Waco nor HUD requires client-level information from the HoT HMIS for the programs it funds. Thus only de-identified and/or aggregate-level data is shared with HUD.

HoT HMIS Goals:

The goals of the HoT HMIS are to support and improve the delivery of homeless services in the Heart of Texas. Inclusive in these goals is the improvement of the knowledge base about homelessness that contributes to an enlightened and effective public response to homelessness. The HoT HMIS is a tool that facilitates the following:

- Improvements in service delivery for clients as case managers assess the client's needs, inform the client about available services on site or through referral, help the client find and keep permanent housing, and improve service coordination when information is shared between programs and among agencies that are serving the same client
- A confidential and secure environment that protects the collection and use of all client data including personal identifiers
- The automatic generation of standard reports required by HUD, including participation in the national Annual Homelessness Assessment Report (AHAR)
- Generation of system-level data and analysis of resources, service delivery needs and program outcomes for the HoT homeless population
- A data collection and management tool for Partners to administer and supervise their programs

All users are required to recognize the need to maintain each client's confidentiality, and will treat the personal data contained within the HoT HMIS with respect and care. As the guardians entrusted with this personal data, each user has both an ethical and a legal obligation to ensure that data is collected, accessed and used appropriately. Of primary concern are issues of security and the policies governing the release of this information to the public, government and funders.

Meeting the needs of homeless persons served by HoT HMIS and its Providers is the underlying and most basic reason for having the HoT HMIS, and employing it for continued improvements in program quality.

Definitions:

Many of the terms used in this Policies and Standard Operating Procedures Handbook may be new to many users. Definitions of some of these terms are as follows:

Agency Administrator - the person responsible for system administration at the agency level and for notifying the HMIS Administrator of needed changes

Authentication - the process of identifying a user in order to grant access to a system or resource; usually based on a username and password

Bowman Systems, L.L.C. - aka Bowman, the company that wrote the software used for the HoT HMIS; Bowman Systems, L.L.C. also houses and maintains the server that holds our HMIS database

Client - any recipient of services offered by a Provider or Partner

Client-level Data - data collected or maintained about a specific person, this type of data can be de-identified for purposes of data analysis, which means that personally identifying information is removed from the record

CoC - Continuum of Care, governing entity to oversee the implementation of HMIS

Database - an electronic system for organizing data, usually organized by fields and records, so it can easily be searched and retrieved

De-identified Data - data that has been stripped of personally identifying information

Encryption - translation of data from plain text to a coded format, only those with the "key" have the ability to correctly read the data; encryption is used to protect data as it moves over the internet and at the database level through the use of special software

Firewall - a method of controlling access to a private network to provide security of data; firewalls can use software, hardware, or a combination of both to control access

HMIS - Homeless Management Information System; this is a generic term for any system used to manage data about homelessness and housing

HoT HMIS- the specific HMIS utilized in the Heart of Texas, currently the HoT HMIS uses software produced by Bowman Systems, L.L.C. called *ServicePoint*

HoT HMIS Administrator - the job title of the person who provides technical support and training to HMIS users, this person has the highest level of user access in *ServicePoint* and has full access to all user and administrative functions

CITY OF WACO (lead agency) - the entity that provides Homeless Management Information Systems (HMIS) support to the Heart of Texas Homeless Coalition and homeless provider agencies

HoTHC - Heart of Texas Homeless Coalition

HUD HMIS Data and Technical Standards -

The HUD HMIS Data and Technical Standards were updated and made effective on October 1st, 2014. These standards can be viewed at https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-

Manual.pdf

Identifying Information - information that is unique to an individual and that may be used to identify a specific person; examples of identifying information are name and social security number

Module - the ServicePoint software has several sections that focus on different types of functions related to HMIS, these sections, known as "modules," include ClientPoint (for entering client data & services), ResourcePoint (for looking up homeless services), and ShelterPoint (for checking clients in and out of beds)

Partner - any agency, organization or group who has an HMIS Agency Agreement and/or contract with HoT HMIS and that is allowed access to the HoT HMIS database, these Agencies connect independently to the database via the Internet

Provider - any organization under contract with HoT HMIS to provide outreach, shelter, housing, employment and/or social services to homeless people

ROI (Release of Information) - A Release of Information indicates that a *ServicePoint* client has given their permission for your provider/organization/program to share their information with other providers outside of your agency

Server - a computer on a network that manages resources for use by other computers in the network; for example, a file server stores files that other computers (with appropriate permissions) can access, one file server can "serve" many files to many client computers, a database server stores a data file and performs database queries for client computers

ServicePoint - a web-based software package developed by Bowman Systems, L.L.C. which tracks data about people in housing crisis in order to determine individual needs and provide aggregate data for reporting and planning

User - an individual who uses a particular software package; in the case of the HoT HMIS, the *ServicePoint* software

User License - an agreement with a software company that allows an individual to use the product, in the case of ServicePoint, user licenses are agreements between CITY OF WACO and Bowman Systems, L.L.C. that govern individual connections to the HoT HMIS, user licenses cannot be shared

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A. Organization and Management of the HoT HMIS

A.1. Project Management

Policy: The CITY OF WACO is responsible for project management and coordination of the HoT HMIS. CITY OF WACO employs the HoT HMIS Administrator who is responsible for all system-wide policies, procedures, communication, performance measurement reporting and coordination. The HMIS Administrator is the primary contact with Bowman Systems, L.L.C. and works with Bowman to implement any necessary or desired system-wide changes and updates. In this role as HMIS Administrator, CITY OF WACO endeavors to provide a uniform HoT HMIS that yields the most consistent data for client management, agency reporting and service planning.

Procedure: All concerns relating to the policies and procedures of the HMIS should be addressed with the HMIS Administrator, the CoC and/or the HoTHC.

A.2. System Administration

Policy: CITY OF WACO employs the HMIS Administrator whose primary responsibility is the coordination and administration of the HoT HMIS.

Procedure: The HoT HMIS Administrator manages day-to-day operations of the HoT HMIS and is governed by a confidentially agreement that allows access to client level data. All system-wide questions and issues should be directed to the HoT HMIS Administrator.

These operations include:

- Release of Information (ROI) for HMIS client data sharing
- Memorandum of Understanding (MOU) between City of Waco and Participating Agencies
- Data Quality Assurance Plan for Participating Agencies in HMIS
- License and support fees charged to Participating Agencies
- Reviews Technical Data Standards as published by HUD
- Organizing training and technical assistance to participating agencies on all HMIS policies and procedures related to authorizing access to the system, including agency setup, questions from users, network questions and system functionality questions;
- Overseeing system administration with concentration on internal and external security protocols;
- Monitoring access to the web based application through automated queries and software application protocols;
- Provide periodic reports from Bowman Systems on data security and test results:
- Coordinating assistance with data analysis, findings, and report writing;
- Coordinating implementation of software enhancements; and
- Conducting training and supervising system administration functions in a way that respects the dignity of the people whose data is being collected.

HUD reports that are reviewed by the body would include:

- Point-In-Time (PIT)
- Housing Inventory Chart (HIC)
- Annual Homeless Assessment Report (AHAR)
- System Performance Report (Sys PM)

A.3. Participating Agency

Policy: Each Partner must designate a staff member to be the HMIS Agency Administrator who is responsible on a day-to-day basis for enforcing the data and office security requirements under these Policies and Standard Operating Procedures.

Procedure: The Executive Director of the Partner Agency must identify an appropriate Agency Administrator and provide that person's name and contact information to the HoT HMIS Administrator. Changes to that information over time should be reported immediately to the HoT HMIS Administrator. The HoT HMIS Administrator is responsible for maintaining a current list of Agency Administrators.

Agency Administrators are responsible for the following:

- Attends required Agency Administrator training.
- Must have an email address and be a licensed user
- Are responsible for the removal of licensed users from the HMIS immediately upon their employee's termination from agency, placement on disciplinary probation, or upon any change in duties not necessitating access to HMIS information, or inform the HoT HMIS Administrator immediately of the change in status.
- Is responsible for all activity associated with agency staff access and use of the
- HMIS data system
 - Provides agency HMIS Users support and clarification on system functionality. Ensures that all authorized persons complete all required steps before obtaining access to the system and adhere to the responsibilities of an HMIS User as outlined in the Policies and Procedures Manual.
- Has access to all client data, user data and agency administration information for the Partner; thus is responsible for the quality and accuracy of this data.
- Ensures the stability of the agency connection to the Internet and ServicePoint, either directly or in communication with other technical professionals.
- Provides support for the generation of agency reports.
- Monitors and enforces compliance with standards of client confidentiality and ethical data collection, entry, and retrieval at the agency level.
- Reports system problems and data-related inconsistencies to HMIS System Administrator.

The Agency also oversees the implementation of data security policies and standards and will:

- Assume responsibility for integrity and protection of client-level data entered into the HMIS system;
- Ensure organizational adherence to the HMIS Policies and Procedures;
- Communicate control and protection requirements to agency custodians and users:
- Authorize data access to agency staff and assign responsibility for custody of the data;
- Ensure that data is collected in a way that respects the dignity of the participants;
- Ensure that all data collected must be relevant to the purpose for which it is used, that the data is entered accurately and on time; and
- Provide prompt and timely communications of data, changes in license assignments, and user accounts and software to the HMIS Administrator

Policy: Every Participating Agency must designate one person to be the Agency Administrator /who holds responsibility for the coordination of the system software at the agency.

Procedure: The Agency Administrator/Data Security Officer will be responsible for duties including:

- Editing and updating agency information;
- Ensuring that access to the HMIS is requested for authorized staff members only after they have:
- received training; for all user levels;
- satisfactorily demonstrated proficiency in use of the software; and demonstrated an understanding of the HMIS Policies and Procedures and agency policies
- Granting technical access to the software system for persons authorized by the Agency's leadership by requesting the system administrator to create passwords needed to enter the system;
- Designating each individual's level of access;
- Ensuring new staff persons are trained on the uses of the HMIS software system, including review of the Policies and Procedures in this document and any agency policies which impact the security and integrity of client information:
- Notifying all users in their agency of interruptions in service;
- Serving as point-person in communicating with the HMIS Administrator;
- Facilitating timely reporting from the Agency;
- Working cooperatively with HMIS technical staff and consultants.

The Agency Administrator/Data Security Officer is also responsible for implementation of data security policy and standards, including:

- Administering agency-specified business and data protection controls;
- Administering and monitoring access control;
- Providing assistance in and/or coordinating the recovery of data, when necessary; and
- Detecting and responding to violations of the Policies and Procedures or agency procedures.
- Maintaining records of background checks for all persons who have been given access to the HMIS in accordance with Texas Administrative Code. (see appendix)

HMIS staff will coordinate training and technical assistance for Agency Administrator.

A.5. User Access Levels

Policy: All HoT HMIS Users will have a level of access to HMIS data that is appropriate to the duties of their position so that information is recorded and accessed on a "need to know" basis. All users should have the level of access that allows efficient job performance without compromising the security of the HoT HMIS or the integrity of client information.

Procedure: Each Agency Administrator (and/or its Executive Director) will identify the level of access each licensed user will have to the HMIS database.

Responsibilities:

The HMIS Administrator agrees to authorize use of the HMIS only to users who
have received appropriate training, and who need access to the system for
technical administration of the system, report writing, data analysis and

- report generation, back-up administration or other essential activity associated with carrying out HMIS responsibilities.
- The Participating Agency agrees to authorize use of the HMIS only to users who need access to the system for data entry, editing of client records, viewing of client records, report writing, administration or other essential activity associated with carrying out participating agency responsibilities.

Users are any persons who use the HMIS software for data processing services. They must be aware of the data's sensitivity and take appropriate measures to prevent unauthorized disclosure. Users are responsible for protecting institutional information to which they have access and for reporting security violations. Users must comply with the data security policy and standards as described and stated by the Agency. Users are accountable for their actions and for any actions undertaken with their usernames and passwords. Users must advise the Agency Administrator (or HMIS Administrator) if their passwords are compromised.

Contractors, volunteers, interns and others who function as staff, whether paid or not, are bound by the same User responsibilities and rules set forth in this manual.

User Levels: There are several levels of access to ServicePoint.

These levels should be reflective of the access a user has to client level paper records and should be determined by a staff person's position in the organization, their direct interaction with clients and their data entry responsibilities.

ServicePoint access levels are described in the following table:

	Resource Specialist	Resource Specialist 2	Resource Specialist 3	Volunteer	Agency	Case Managers 1 &2	Agency Admins	Directors	System Operators	System Admins	System Admins 2
ClientPoint						1.00					
Profiles				X	Х	X	X	Х		X	Х
Assessments						X	X	X		X	X
Case Notes						X	X	X		X	X
Case Plans						X	X	X		X	X
Service Records				X	×	×	×	X		×	X
ServicePoint					-		-				
Referrals				X	X	X	X	X		X	X
Services Provided					Х	x	Х	х		Х	х
ResourcePoint	Х	X	X	X	X	X	X	X	X	X	X
ShelterPoint				×	X	×	X	X		×	X
Reports					17 1/16 1	1	1 1111				
Audit Reports											
Client/Service							Х	Х		Х	X
Information											
User Information			X				X	X		X	X
Client/Service Access Information											х
Provider Reports						010-10					
Client Served Report						×	X	×		X	
Daily Bed Report			X			X	X	X		X	X
Entry/Exit Report						X	X	X		X	8
Exhibit 1 Report											8
HUD 40118 APR						X	X	X		X	8
PATH Report		1	1		0	×	X	X		X	8
Outstanding Referrals Report			X			х	Х	x		X	х
Service Transaction Report						X	×	×		×	×
Needs Report		()				×	X	X		×	8
ReportiViller						X	X	X		X	Х
Administration		2.0								1000	-
Add/Edit Users							X	Х	X	X	X
Reset Passwords							Х	×	х	Х	х
Add Provider			X		4		6		X	X	X
Edit Provider		#	X				#	#	Х	X	Х
Delete Provider		- 5	X				%	- 1	X	X	X
Agency News		X	X		X	X	X	Х	X	X	X
System News			X						Х	X	X
Provider Groups											X
Picklist Data									X	X	X
Licenses							-		X	X	X
Assessment Admin									×	×	×
Shadow Mode											X
System Preferences											×

<sup>X. Users have access to this section of ServicePoint.

Users can neither delete the Provider they belong to, nor any of their Parent Providers.

Users can not edit their Parent Provider, they may edit their own Provider or their Child Providers only.

& Users can run the report for Provider Groups.</sup>

A.6. Training Schedule

HMIS staff will coordinate ongoing training schedules for Systems Administrators, Agency Administrators and End Users. Training will occur on a regular basis. The schedule of trainings will be published by HOTHC/HMIS Staff.

Training schedule

Ethics and Compliance Training

- Mandatory
- Review of Ethics
- Review of Compliance around Privacy and HIPAA laws and regulations

New User Training: Introduction to the HMIS System (End User Training)

- Introduction to the HMIS Project
- Review of applicable policies and procedures each year
- Logging on to the HMIS System
- Entering client information including Universal Data Elements, Program specific elements, demographics, Entry/Exits, and service transactions

Job Function Training:

- Intake Worker
- Resource Specialist
- Activity Specialist
- Case Manager
- Program Manager
- Executive Director

Agency Administrator Training:

- Six hours mandatory
- Review of agency roles and responsibilities
- Review of security policies and procedures
- Overview of system administrative functions
- Entering and updating information pertaining to the participating agency
- Review of HMIS technical infrastructure
- Reporting

Annual recertification of training required based on job/administration function.

A.7. Communication with Partners

Policy: The HoT HMIS Administrator is responsible for relevant and timely communication with each agency regarding the HoT HMIS. The HoT HMIS Administrator will communicate system-wide changes and other relevant information to Agencies as needed. He/she will also maintain a high level of availability to Partners. Good communication is essential to the proper functionality of any system, electronic or otherwise. Providing a single point of communication simplifies and speeds

communications within the HoT HMIS. The HoT HMIS Administrator will also develop and maintain a listsery to facilitate communication with agency administrators.

Procedure: General communications from the HoT HMIS Administrator will be directed towards the Agency Administrator. Specific communications will be addressed to the person or people involved. The HoT HMIS Administrator will be available via email, phone, and mail. The message board (NewsFlash) function in ServicePoint will also be used to distribute HMIS information. While specific problem resolution may take longer. the HoT HMIS Administrator will strive to respond to Partner questions and issues within three business days of receipt. In the event of planned unavailability, the HoT HMIS Administrator will notify Partners in advance and designate a backup contact. Information affecting all users will be directed to the Agency Administrators. Agency Administrators are responsible for distributing that information to any additional people at their agency who may need to receive it, including, but not limited to, Executive Directors, client intake workers, and data entry staff. Agency Administrators are responsible for communication with all of their agency's users. If an Agency is needing help there the agency will need to submit a HMIS Help Desk Ticket that will be address by HMIS administrator within 72 hours. If received on a weekend or Holiday the 72 hours will begin on the next regular business work day.

A.8. Communication with HoT HMIS Administrator

Policy: Partner Agencies are responsible for communicating needs and questions regarding the HoT HMIS directly to the HoT HMIS Administrator. In order to foster clarity both for HoT HMIS users and for Bowman Systems, L.L.C. ALL communications with Bowman regarding the HoT HMIS must go through the HoT HMIS Administrator. CITY OF WACO holds the contract with Bowman, and is therefore responsible for acting as the primary contact for the HoT HMIS. Designated points of communication within Partners and within CITY OF WACO simplify and speed communications about the HoT HMIS.

Procedure: Users at Partner Agencies will communicate needs, issues and questions to the Agency Administrator. If the Agency Administrator is unable to resolve the issue, the Agency Administrator will contact the HoT HMIS Administrator via email, phone or mail. The HoT HMIS Administrator will attempt to respond to Partner needs within three business days of the first contact. If the HoT HMIS Administrator cannot resolve the issue, he/she may contact Bowman Systems, L.L.C. for technical assistance.

A.9. System Availability

Policy: CITY OF WACO and Bowman Systems, L.L.C. will provide a highly available database server and will inform users in advance of any planned interruption in service. A highly available database affords agencies the opportunity to plan data entry, management, and reporting according to their own internal schedules. Availability is the key element in maintaining an HMIS that is a useful tool for Partners to use in managing programs and services.

Procedure: No computer system achieves 100% uptime. Downtime may be experienced for routine maintenance, in the event of a disaster or due to systems failures beyond the control of Bowman Systems, L.L.C. or CITY OF WACO. In the event of disaster or routine planned server downtime, Bowman Systems, L.L.C. will contact the HoT HMIS Administrator. The HoT HMIS Administrator will contact Agency Administrators and inform them of the cause and duration of the interruption in service. The HoT HMIS Administrator will log all downtime for purposes of system evaluation. In the event that it is needed, Bowman Systems, L.L.C. is required to have redundant systems in place so

that connection to the server can be restored as quickly as possible.

A.10. Inter-Agency Data Sharing

Policy: The HoT HMIS is an open data sharing system. This means that clients' data will be shared among Partners within the HoT HMIS. A Release of Information (ROI) is required to be signed by each client before the information is entered into the HMIS. The ROI must be established in *ServicePoint* on the same day (or a previous date) the demographic data is entered into the system. Fields such as medical, mental health and legal stay closed at all times. Other fields, such as case management, can be closed upon request.

Procedure: When new clients and new service records are entered into ServicePoint, the initiating user must maintain the default setting of each record as "open" to users from other Partners.

A.11. Ethical Data Use

Policy: Data contained in the HoT HMIS will only be used to support or report on the delivery of homeless and housing services in the Heart of Texas. Each HMIS User will affirm the principles of ethical data use and client confidentiality contained in the HoT HMIS Policies and Standard Operating Procedures Manual and the HoT HMIS User Agreement. The data collected in the HoT HMIS is the personal information of people in the Heart of Texas community who are experiencing a housing or financial crisis. It is the user's responsibility as the guardian of that data to ensure that it is only used to the ends to which it was collected and in and the manner to which the individual client has given consent.

Procedure: All HoT HMIS users will sign a HoT HMIS User Agreement before being given access to the HoT HMIS. Any individual or Partner misusing, or attempting to misuse HMIS data will be denied access to the database, and his/her/its relationship HoT HMIS may be terminated.

A.12. Access to HoT HMIS Database

Policy: No one but Bowman Systems, L.L.C. will have direct access to the HoT HMIS database through any means other than the *ServicePoint* software.

Procedure: Under its contract with CITY OF WACO, Bowman Systems, L.L.C. will monitor both our web application server and our database server and employ updated security methods to prevent unauthorized database access. Any party who has access to the HoT HMIS database must sign a User Agreement prior to system access.

A.13. Client Rights and Confidentiality of Records

Policy: The HoT HMIS operates under a protocol based on the Release of Information (ROI) to include client data in the HMIS. Each Partner is required to post a HoT HMIS Discloser in a place where clients may easily view it such as the point of intake, on a clipboard for outreach providers, in a case management office, etc. The HoT HMIS Disclosure includes a statement about the uses and disclosures of client data as outlined in this document (See Attachment D). An ROI is required in order for a client's information to be shared with other participating agencies within the HoT HMIS. Clients may opt out of HMIS or be unable to provide basic personal information. Clients have the right of refusal to provide personally identifiable information to the HMIS,

except in cases where such information is required to determine program eligibility or is required by the program's funders. Such refusal or inability to produce the information shall not be a reason to deny eligibility or services to a client. When a client exercises his/her right of refusal, de-identified demographic information will be entered into the HMIS. Each Partner shall take appropriate steps to ensure that authorized users only gain access to confidential information on a "need-to-know" basis. The data in the HoT HMIS is personal data, collected from people in a vulnerable situation. CITY OF WACO and Partners are ethically and legally responsible to protect the confidentiality of this information. The HoT HMIS will be a confidential and secure environment protecting the collection and use of client data.

Procedure: Access to client data will be controlled using security technology and restrictive access policies. Each Partner must make available a privacy policy related to client data captured in HMIS. The HoT HMIS Disclosure must be placed in an area easily viewed by clients. Only individuals authorized to view or edit individual client data in accordance with the stated privacy policies and these Standard Operating Procedures will have access to that data. The HoT HMIS will employ a variety of technical and procedural methods to ensure that only authorized individuals have access to individual client data.

A.14. Partner Grievances

Policy: Partners will contact the HoT HMIS Administrator to resolve HMIS problems including but not limited to operation or policy issues. If an issue needs to be escalated, Partners may also contact the HMIS Program Planner or Director of Housing and Economic Development at the City of Waco.

Procedure: Partners will bring HMIS problems or concerns to the attention of the HoT HMIS Administrator, who may ask for these issues to be stated in writing. If problems, concerns or grievances cannot be resolved by the HoT HMIS Administrator, or if it is not appropriate to raise the issue with the HoT HMIS Administrator, the issue can be directly relayed to the Director of Housing and Economic Development. If the grievance requires further attention, the HoTHC and CoC may be notified.

A.15. Client Grievances

Policy: Clients must contact the Partner with which they have a grievance for resolution of HoT HMIS problems. Partners will report all HMIS-related client grievances to the HoT HMIS Administrator. If the Partner's grievance process has been followed without resolution, the Partner may escalate the grievance to HoT HMIS Administrator as outlined in Section A.12. At any time, clients may request that their personally-identifying information be removed from the HoT HMIS.

Procedure: Each Partner is responsible for answering questions, complaints and issues from their own clients regarding the HoT HMIS. Partners will provide a copy of their privacy policy and/or of the HoT HMIS Policies and Standard Operating Procedures Manual upon client request. Client complaints should be handled in accordance with the Partner's internal grievance procedure, and then escalated to HoT HMIS Administrator in writing if no resolution is reached. HoT HMIS Administrator is responsible for the overall use of the HoT HMIS, and will respond if users or Partners fail to follow the terms of the HoT HMIS Agency Agreement, breach client confidentiality or misuse client data. Partners are obligated to report all HMIS-related client problems and complaints to HoT HMIS Administrator, which will determine the need for further action. The HoT HMIS Administrator will record all grievances and will

report these complaints to the CoC. Resulting actions might include further investigation of incidents, clarification or review of policies or sanctioning of users and Agencies if users or Agencies are found to have violated standards set forth in HoT HMIS Agency Agreements or the Policies and Standard Operating Procedures Manual. Upon the client's request for data removal from the HoT HMIS, the Agency Administrator will delete all personal identifiers of client data within 72 hours. A record of these transactions will be kept by the Agency Administrator.

A.16. Hardware/Software Requirements

Policy: Partners will provide their own computer and method of connecting to the Internet, and thus to the HoT HMIS. CITY OF WACO understands the cost and difficulty of acquiring and maintaining computers and Internet access.

Procedure: Contact the HoT HMIS Administrator for the current status of assistance. Hardware/Software Requirements: ServicePoint is web-enabled software; all that is required to use the database is a computer, a valid username and password, and the ability to connect to the Internet. There is no unusual hardware or additional ServicePoint-related software or other software installation required. Bowman guidelines state the following workstation specifications.

Workstation Requirements

- Memory
 - Vista or a newer version of Microsoft 4 Gig recommended, 2 Gig minimum
- Monitor
 - Screen Display 1024 by 768 (XGA)
- Processor
 - A Dual-Core processor is recommended
- Mobile
 - Apple I-Pad operating with the latest version of iOS
- Internet Connection
 - o Broadband
- Browser
 - ServicePoint is compatible with the newest versions of Internet Explorer, Google Chrome, Mozilla Firefox, and Apple Safari
- JAVA
 - Java is required for the Advanced Reporting Tool. JAVA version 7 release 76 (32 bit) is the only recommended version by Bowman Systems. Java version 7 is no longer supported by the Google Chrome browser.

Although there is no unusual hardware or additional ServicePoint-related software required to connect to the database, the speed and quality of the Internet connection and the speed of the hardware could have a profound effect on the ease of data entry and report extraction. A high-speed Internet connection, like a DSL, is preferred, as is a computer with speeds above 166MHz. Bowman also recommends the use of Windows Vista, 7, 8, or 8RT. Windows 10 is expected to be compatible, but users are urged to not upgrade until thorough testing has been completed.

A.17. Technical Support/Assistance

Policy: CITY OF WACO will provide technical assistance including ongoing software support for users of the HoT HMIS. Internal hardware and internet connectivity issues should be addressed by the Partner's internal IT staff.

Even though the equipment and internet connection used to connect to the HoT HMIS is owned by the Partner, CITY OF WACO will provide technical assistance when possible and as resources allow.

Procedure: Hardware and connectivity issues not related to the HMIS software should be addressed by the Partner's internal IT staff. Partners may contact the HoT HMIS Administrator for technical support of the components necessary to connect to the HoT HMIS.

Technical Assistance Request from Participating Agency:

- End user contacts Agency Administrator with question or concern.
- Agency Administrator Staff attempts to resolve issue. If unable to resolve, agency staff will contact the HMIS Administrator via electronic Technical Assistance Request (available on THE HOTHC website). If the issue is of an urgent nature HMIS staff can be contacted directly in order to request expedited service. Receipt of all requests will be sent within one business day and resolved as quickly as possible.
- HMIS Administrator determines resources needed for service and if necessary, contacts software vendor for support.

Chain of communication: (Problems should be resolved at the lowest possible level to assure minimum time to resolution).

- End User
- Agency Administrator
- HMIS Administrator

A.18. Training Manual

Policy: A HoT HMIS Training Manual will be given to each new user upon initial training along with The Heart of Texas HMIS Policy and Standard Operating Procedures Manual. Technical assistance is offered throughout the duration of a user's employment with a Partner. The HoT HMIS Training Manual will provide specific technical instruction to HoT HMIS Users about how to use ServicePoint. The manual will be revised and redistributed as significant updates are performed on *ServicePoint*.

Procedure: The HoT HMIS Administrator will create, distribute and update the HoT HMIS Training Manual. This will include procedures that are held in common for all Partners, as well as forms for customizing the Training Manual for each Partner.

A.19. Monitoring and Evaluation

Policy: HoT HMIS Administrator will regularly monitor and evaluate the effectiveness of the HoT HMIS and, based on the information received, will continue to make enhancements to the HoT HMIS and the Policies and Standard Operating Procedures as necessary. This may include compliance with the HMIS Standard Operating Procedures and with HUD's Data and Technical Standards. Monitoring and evaluation helps ensure security and proper usage of the HoT HMIS.

Procedure: The HoT HMIS Administrator will conduct internal system monitoring and

may contact Agency Administrators to schedule monitoring and evaluation visits. HoT HMIS Administrator's back up personnel of CITY OF WACO may also contact Agency Administrators or other Partner staff in relation to the HMIS portion of standard monitoring visits conducted by HoT HMIS Administrator over the course of each year.

Each quarter, the HMIS Administrator will generate Report Cards that include measurements of HMIS usage and CoC program performance criteria

- 1. Partner Agencies with failing HMIS grades will be required to attend refresher training.
- 2. CoC Agencies with consistent low performance or failing HMIS grades will be required to meet with the HMIS Administrator and Collaborative Applicant to discuss ways to improve data collection.
- 3. CoC Agencies with consistent failing grades will be required to document an improvement plan.
- 4. CoC Agencies unable to improve HMIS usage and performance may have funds reallocated based upon a recommendation from the Independent Evaluation Committee and approval by the CoC Committee.

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B. Security and Access

B.1. User Access

Policy: The HoT HMIS Administrator will provide unique user names and initial passwords to each Partner user. User names will be unique for each user and will not be exchanged or shared with other users. The HoT HMIS Administrator will have access to the list of user names for the HoT HMIS and will track user name distribution and use. Only CITY OF WACO will be authorized to purchase or grant additional user licenses to an Agency that has utilized all current licenses. Unique user names and passwords are the most basic building block of data security. Not only is each user name assigned a specific access level, but in order to provide to clients or program management an accurate record of who has altered a client record, when it was altered, and what the changes were it is necessary to log a user name with every change. Exchanging or sharing user names seriously compromises the security of the HoT HMIS, and will be considered a breach of the user agreement and will trigger appropriate repercussions and/or sanctions for the user and agency.

Procedure: The HoT HMIS Administrator will provide unique user names and initial passwords to each user upon completion of training, signing of a confidentiality agreement and receipt of the Policies and Standard Operating Procedures Manual. The sharing of user names will be considered a breach of the user agreement. The HoT HMIS Administrator is responsible for distributing user names and initial passwords to agency users and can also provide current users with a new password if he/she requires one.

B.2. User Changes

Policy: The HoT HMIS Administrator will make any necessary changes to the Partner user accounts. This includes issuance of new passwords and managing access levels, etc. The Agency Administrator is required to contact the HoT HMIS Administrator immediately upon a change in status of any user within their Partner Agency. Upon receipt of this change in status the HoT HMIS Administrator will take action to produce the needed changes in access for the specified user if the Agency Administrator has not already done so. The HoT HMIS Administrator has the ability to change user names and redistribute user licenses to accommodate the Partner organization.

Procedure: The HoT HMIS Administrator will make any necessary changes to the list of Partner users. Changes in Agency Administrators must be reported to the HoT HMIS Administrator. The Agency Administrator is required to notify the HoT HMIS Administrator of a terminated employee immediately upon termination of employment. For employees with user access otherwise leaving the agency, the user license should be revoked at the end of business on the person's last day of employment.

B.3. Passwords

Policy: Users will have access to the HoT HMIS via a user name and password. Passwords must be changed a minimum of once every 45 days. Users will keep their passwords confidential. Under no circumstances shall a licensed user share a password nor shall they post their password in an unsecured location. These methods of access are unique to each user and are confidential. Users are responsible for keeping their passwords confidential. For security reasons, passwords will automatically be reset every 45 days.

Procedure: The HoT HMIS Administrator will issue a user name and temporary password to each new user who has completed training. Upon sign in with the user name and temporary password, the user will be required by the software to select a unique password that will be known only to that specified user. Every 45 days, passwords are reset automatically by the HoT HMIS software.

B.4. Password Recovery

Policy: The HoT HMIS Administrator will reset a user's password in the event the password is lost or forgotten. Agency Administrators also have the capability to reset a user's password. Either Administrator must validate the authenticity of the request if the request is not made in person.

Procedure: In the event of a lost or forgotten password, the user whose password is lost will contact the Agency Administrator or the HoT HMIS Administrator. The Administrator will reset the user password, and issue a temporary password to allow the user to login and choose a new password. The new password will be valid from that time forward, until the next 45-day forced change. Administrators must validate the authenticity of the request if the request is not made in person. In other words, neither Agency Administrators nor the HoT HMIS Administrator shall issue a new password without ensuring that the person requesting it is, in fact, the person with the authorization to use it. For example, if a request is made by phone or email, the Agency Administrator or System Administrator should call the user back at his/her desk (using the contact number on file) before issuing a new password.

B.5. Extracted Data

Policy: HoT HMIS users will maintain the security of any client data extracted from the database and stored locally, including all data used in custom reporting. HoT HMIS users will not electronically transmit any unencrypted client data across a public network. The custom report-writer function of ServicePoint allows client data to be downloaded to an encrypted file on the local computer. Once that file is unencrypted by the user, confidential client data is left vulnerable on the local computer, unless additional measures are taken. Such measures include restricting access to the file by adding password protection. For security reasons, unencrypted data may not be sent over a network that is open to the public. Unencrypted data may not be sent via email. HMIS users should apply the same standards of security to local files containing client data as to the HMIS database itself.

Procedure: Data extracted from the database and stored locally will be stored in a secure location (not on floppy disks/CDs or other temporary storage mechanisms like flash drives or on unprotected laptop computers, for example) and will not be transmitted outside of the private local area network unless it is properly protected via encryption or by adding a file-level password. The HoT HMIS Administrator will provide help in determining the appropriate handling of electronic files. All security questions will be addressed to the HoT HMIS Administrator. Breach of this security policy will be considered a violation of the user agreement, which may result in personnel action and/or agency sanctions.

B.6. Data Access Computer Requirements

Policy: Users will ensure the confidentiality of client data, following all security policies in the HoT HMIS Policies and Standard Operating Procedures Manual and

adhering to the standards of ethical data use, regardless of the location of the connecting computer. All Policies and Procedures and security standards will be enforced regardless of the location of the connecting computer. HMIS Administrator may restrict access to the HoT HMIS to specific computers in the future. Because ServicePoint is web-enabled software users could conceivably connect to the database from locations other than the Partner itself, using computers other than agency-owned computers. Connecting from a non-agency location may introduce additional threats to data security, such as the ability for non-ServicePoint users to view client data on the

computer screen or the introduction of a virus. If such a connection is made, the highest levels of security must be applied, and client confidentiality must still be maintained. This includes only accessing the HoT HMIS via a computer that has virus protection software installed and updated.

Procedure: Each Partner and Agency Administrator is responsible for:

- 1. Physical Space. Partners must take reasonable steps to ensure client confidentiality when licensed users are accessing the HoT HMIS. Licensed users are required to conduct data entry in a protected physical space to prevent unauthorized access to the computer monitor while confidential client information is accessible.
- 2. Use of a non-agency computer located in a public space (i.e. Internet café, public library) to connect to HMIS is prohibited.
- 3. Time-Out Routines. Each Agency Administrator will be required to enable time-out (login/logout) routines on every computer to shut down access to the HoT HMIS when a computer is unattended. Time-out routines will be engaged at a minimum after 10 minutes of inactivity or at other intervals as determined.
- 4. Each computer that accesses HMIS must have current virus software that updates automatically installed.
- 5. If the HMIS is accessed over a network, the network must be protected by a hardware or software firewall at the server. A stand-alone machine that accesses HMIS must also have a hardware or software firewall installed and active. This may be the firewall protection included as part of the operating system or the virus protection software installed on the computer.

Questions about security of the HoT HMIS should be referred to the HoT HMIS Administrator.

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C. Agency Participation Requirements

C.1. HoT HMIS Agency Agreements

Policy: Only Partners will be granted licenses to access the HoT HMIS system. The CITY OF WACO shall make the sole determination to identify Partners. The Executive Director (or appropriate designee) will be required to sign the "HMIS Partner Agreement" (Attachment A) binding their organization to the HoT HMIS Policies and Standard Operating Procedures and all applicable laws and regulations regarding the handling of client data before access is granted. CITY OF WACO has final authority over the HoT HMIS. In order to ensure the integrity and security of sensitive data, CITY OF WACO will regulate access to this data. Only Agencies that have agreed to the terms set out in the HMIS Agency Agreement will be allowed access to the HoT HMIS. The agency agreements will include terms of access, an acknowledgement of receipt of the Policies and Standard Operating Procedures Manual, and an agreement to abide by all provisions contained therein.

Participating Agencies shall sign a Memorandum of Understanding and comply with the stated requirements. Agencies will be granted access to the HMIS software system after:

- The MOU has been signed with the City of Waco, and
- Agencies put into place the stated requirements in the MOU.

Procedure: Partners will be given a copy of the HMIS Agency Agreement, the Policies and Standard Operating Procedures Manual, and any other relevant paperwork in time for adequate review and signature. Once that paperwork has been reviewed and signed by the Executive Director (or appropriate designee), the HoT HMIS Administrator will issue a certain number of licenses for use by the agency and assist with the set-up of an Agency Administrator. Agency users will be trained to use ServicePoint by the HoT HMIS Administrator. Once training has been completed, each user will be issued a user name and password by HOT HMIS Administrator.

Agencies agree to comply with these policies and procedures.

C.2. User Licenses

Policy: In order to obtain a license, a user must successfully complete training by the HoT HMIS Administrator and must sign a User License Agreement (Attachment B) upon completing training. Sharing of licenses, User IDs or passwords is strictly prohibited. If necessary, Partners may purchase additional User Licenses from Bowman Systems, L.L.C. through CITY OF WACO. The cost for User Licenses will be determined by CITY OF WACO based on Bowman charges and funding availability. CITY OF WACO purchases a number of user licenses on behalf of the HoT HMIS and determines the number of users appropriate for participating agencies. Partners may need to purchase additional User Licenses. This purchase can be made at any time.

Procedure: Each Agency Administrator (or Executive Director) will identify the staff designated to be the licensed users of the HoT HMIS and submit the names to the HoT HMIS Administrator. CITY OF WACO determines the number of users appropriate for participating agencies based on the list provided and other factors. Partners wishing to purchase additional User Licenses will notify the HoT HMIS Administrator. The HoT HMIS Administrator will purchase the User Licenses from Bowman Systems, L.L.C. and bill the Partner accordingly. The HoT HMIS Administrator purchases licenses online, through

the ServicePoint program. The HoT HMIS Administrator will then notify the Partner when the additional Licenses are available. Bowman invoices CITY OF WACO for the cost of the licenses. Then, in turn, CITY OF WACO invoices the responsible Agency accordingly.

C.3. User Activation

Policy: Each new user will be issued a user name and password to access the HoT HMIS upon approval by the Agency Administrator or System Administrator, completion of ServicePoint training and signing of the HMIS User Agreement. Every user must receive appropriate ServicePoint training before being issued a user name and password.

Procedure: The HoT HMIS Administrator will distribute user licenses for Partners. Agency Administrators are responsible for notifying the HoT HMIS Administrator of user changes. The HoT HMIS Administrator will be responsible for training all new users. The HoT HMIS Administrator will provide training to Agency Administrators and all users in the Partner Agency and will supplement this training as necessary.

C.4. HMIS User Agreements

Policy: Each Partner User will sign the HoT HMIS User Agreement before being granted access to the HoT HMIS. Clients' confidential information is not to be accessed or shared for any reason other than job performance. User names and passwords are not to be shared under any circumstances. Any breach in this contract will result in immediate action. Before being granted access to the HoT HMIS, each user must sign an HMIS User Agreement, stating that he or she has received or is in the process of training, will abide by the HoT HMIS Policies and Standard Operating Procedures Manual, will appropriately maintain the confidentiality of client data, and will only collect, enter and retrieve data in the HoT HMIS relevant to the delivery of services to people in housing crisis in the Heart of Texas.

Procedure: The Agency Administrator or HoT HMIS Administrator will distribute HMIS User Agreements to new HMIS Users for signature. The HoT HMIS Administrator will file signed HMIS User Agreements for all users. Allowing a user access to the HoT HMIS without a signed user agreement is a violation of the HoT HMIS Policy & Standard Operating Procedures and may result in program sanctions.

C.5. Training

Policy: The HMIS Administrator is responsible for defining training needs and organizing training sessions for system users. The HoT HMIS Administrator will provide various training options, to the extent possible, based on the needs of HMIS users. The HoT HMIS Administrator will provide for adequate and timely *ServicePoint* training. The training schedule may be obtained from the HoT HMIS Administrator. In order for the HoT HMIS to be a benefit to clients, a tool for Authorized Agencies and a guide for planners, all users must be adequately trained to collect, enter and extract data.

The agency admin is also responsible for making sure the proper training has occurred for the users in their agency and that HMIS policies are being followed. Agency admins must also notify the HMIS administrator if any changes have occurred to their program.

Procedure: The HMIS Administrator will provide access to training for all HMIS users. Agency Administrators will be given additional training relevant to their position.

Each end user will be required to attend a refresher each year. Each Agency Admin will be required to attend an Agency Admin training and a report training each year.

New User/Referesher Training: (Offered Quarterly)

New User Training is designed for staff members who will need to start using ServicePoint. This training is required of all new ServicePoint users before access to the protected ServicePoint website. This training will cover history, importance of data, ethics, and basic ServicePoint overview.

Agency Admin Training: (Offered Bi-Annual)

Agency admin training is required of all current or new ServicePoint users who are stepping up into the role of Agency Admin. The agency admin at each agency is our point of contact at each agency in regards to ServicePoint and is required to submit certain reports to our HMIS team each month, train new users in agency specific ServicePoint workflow, and attend HMIS Advisory meetings. The Agency Admin must go through a New User training prior to completing the Agency Admin training.

Reporting Tool:

Training dates will be added as necessary when a new Agency Admin comes on board or someone gets a reporting license.

C.6. Contract Termination Initiated by Partner

Policy: Partners may terminate the HMIS Agency Agreement with or without cause upon 30 days written notice to CITY OF WACO and according to the terms specified in the HMIS Agency Agreement. The termination of the HMIS Agency Agreement by the Partner may affect contracts issued by HUD. In the event of termination of the HMIS Agency Agreement, all data entered into the HoT HMIS will remain an active part of the HoT HMIS. While Partners may terminate relationships with the HoT HMIS, the data entered prior to that termination would remain part of the database. This is necessary for the database to provide accurate information over time and information that can be used to guide planning for community services in the Heart of Texas.

Procedure: Certain Provider Agencies are required to participate in the HoT HMIS as a condition of their funding. For all non-HUD Funded Partners terminating the HMIS

Agency Agreement, the person signing the HMIS Agency Agreement (or a person in the same position within the agency) will notify HMIS Administrator 30 days or more from the date of termination. In all cases of termination of HMIS Agency Agreements, the HoT HMIS Administrator will inactivate all users from that Partner on the date of termination of agreement.

C.7. Contract Termination Initiated by CITY OF WACO

Policy: On behalf of the City of Waco the HoT HMIS Administrator may terminate the HMIS Agency Agreement for non-compliance with the terms of the agreement or with the HMIS Policies and Standard Operating Procedures with written notice to the Partner. The HMIS Administrator may also terminate the HMIS Agency Agreement with or without cause with 15 days written notice to the Partner and according to the terms specified in the HMIS Agency Agreement. If a Partner's contract is terminated under the terms of that contract, the agreement for HMIS access for that program will also be terminated. In that case, access will be renegotiated by the HoT HMIS Administrator and the agency in accordance with these standard operating procedures. The

termination of the HMIS Agency Agreement may affect contractual relationships with HUD. In the event of termination of the HMIS Agency Agreement, all data entered into the HoT HMIS will remain a part of the HoT HMIS. If termination of the HMIS Agency Agreement occurs, all Partner users will be inactivated on the date the HMIS Agency Agreement or contract is terminated. While the HMIS Administrator may terminate the HMIS Agency Agreement with the Partner, the data entered by that Partner prior to termination of contract would remain part of the database. This is necessary for the database to provide accurate information over time and information that can be used to guide planning for community services in the Heart of Texas.

Procedure: When terminating the HMIS Agency Agreement, the HMIS Administrator of the City of Waco will notify the person from the Partner Agency who signed the HMIS Agency Agreement (or a person in the same or higher position within the agency) 15 days or more prior the date of termination of contract, unless the termination is due to non-compliance with the Standard Operating Procedures. Willful neglect or disregard of the Standard Operating Procedures may result in immediate termination of a Partner Agency from the HoT HMIS. In all cases of termination of HMIS Agency Agreements, the HoT HMIS Administrator will inactivate all users from that Partner Agency on the date of termination of contract.

D. Data Collection, Quality Assurance and Reporting

D.1. Required Data Collection

Policy: Providers funded by HUD through the Supportive Housing Program, Shelter Plus Care, Section 8 Moderate Rehabilitation and the Emergency Shelter Grant are required to participate in HMIS by HUD. All Partners that participate in HMIS are considered "Covered Homeless Organizations" (CHO) and are required to comply with HUD's *HMIS Data and Technical Standards* unless those standards are in conflict with local laws. This includes the collection of required data elements.

Providers shall attempt to collect basic information on every client served by the Provider upon intake into the Provider's facility or program. If client refuses or is unable to provide basic information, providers shall, at a minimum, enter each client as an Anonymous Entry into the HoT HMIS system. Partners may choose to collect more client information for their own case management and planning purposes.

Assessment Data Collection: Providers of certain programs shall attempt to conduct detailed assessments on each client who has gone through the intake process and has been accepted into the Provider's facility or program. At a minimum, providers shall attempt to collect the assessment information required as part of HUD's Data and Technical Standards.

Timeliness of Data Entry: Providers are required to enter basic client intake data into the HoT HMIS weekly. All data entry must be completed on or before the following Monday for clients served during the prior week.

Exceptions to these data collection policies are in place for domestic violence shelters. DV shelters by law are not allowed to participate in the HMIS.

In order for the data contained within the HoT HMIS to be useful for data analysis and reporting to funders, certain minimum data must be consistently collected throughout the system.

Client entry and exit dates: It is important for users to accurately capture entry and exit dates for clients in their programs. If data is being entered after the client's actual entry, the user needs to be sure that the date stamp on the Entry/Exit for that client accurately portrays the entry for that program. When making changes to client's profiles, a user should do so through the client's Entry/Exit tab. If a client is staying in a shelter program, updates and changes should be done through the ShelterPoint Entry/Exit for that client. If an incorrect Exit Date is entered, the user must delete the Entry/Exit for that client as well as any services associated with it and enter the data again.

Procedure: Each agency should review Attachment E to determine the type of data that is required to be collected and entered into HMIS.

D.2. Client Consent

Policy: Each agency must post a sign at each intake or comparable location explaining the reasons for data collection for those seeking services. Consent for entering of data into HMIS is to be documented by the ROI when the client accepts the services offered. The client has the option to opt out of allowing his or her identifying information to be added to the database. In that case, the client's data should be added to the HoT HMIS

without identifiers although the record should be tracked internally by the agency to minimize the number of duplicate records for one client. Electronic client data will be shared among Partners. Privacy Policies should be in effect for each agency to both inform clients about the uses and disclosures of their personal data and to protect the agency by establishing standard practices for the use and disclosure of data. Client consent notices must contain enough detail so that the client may make an informed decision.

Procedure: HMIS has an established privacy policy which will be posted in appropriate areas for client review at each Partner Agency (Attachment D). The HMIS Administrator will review the privacy notices as part of the annual HMIS review and/or through regular monitoring. If a client denies permission to enter confidential data, the Partner will enter the de-identified data into the HoT HMIS and track the record to minimize duplicate records for each client.

D.3. Release of Information

Policy: The Heart of Texas HMIS operates as an open data sharing system. This means that the client data collected by Partners is shared information. This is most effectively achieved when the Release of Information (ROI) is established in the system for each client served and by each Provider. The ROI must begin on the day (or a date prior to) the data is entered into the HMIS. The ROI is to remain effective for a time period of three years. During this three year span of time, the client's data is viewable by all Partners in the HoT HMIS. Aggregate data may be released to the public for purposes beyond those specified in HUD HMIS Data Standards Manual. All publicly released data must be anonymous by removal of all identifiers and/or all information that could be used to infer an individual or household identity.

Procedure: Each client served is required to read and sign a ROI. The ROI will then be established on or before the date of data entry in order for the client data to be shared properly with other Partners.

D.4. Appropriate Data Collection

Policy: HoT HMIS users will only collect client data relevant to the deliveryof services to people in housing crises in the Heart of Texas and/or required by funders or by law. The purpose of the HoT HMIS is to support the delivery of homeless and housing services in the Heart of Texas. The database should not be used to collect or track information not related to serving people in housing crises or otherwise required for policy development and planning purposes.

Procedure: Agency Administrators will ask the HoT HMIS Administrator for any necessary clarification of appropriate data collection. The HoT HMIS Administrator, in consultation with CITY OF WACO, will make decisions about the appropriateness of data being entered into the database. This concern targets data elements that can be consistently tracked and reported, and does not specifically target the contents of case management notes or other fields not to be aggregated.

D.5. Data Ownership

Policy: The HoT HMIS, and any and all data stored in the HoT HMIS, is the property of CITY OF WACO. CITY OF WACO has authority over the creation, maintenance and security of the HoT HMIS. Violations of the HoT HMIS Agency Agreement, the HoT HMIS Policies and Standard Operating Procedures, privacy policies developed at the agency

level, or other applicable laws may subject the Partner to discipline and/or termination of access to the HoT HMIS. In order to ensure the integrity and security of sensitive client information and other data maintained in the database, CITY OF WACO will be responsible for data ownership.

Procedure: The HMIS Agency Agreement includes terms regarding the maintenance of the confidentiality of client information, provisions regarding the duration of access, an acknowledgement of receipt of the Policies and Standard Operating Procedures Handbook, and an agreement to abide by all policies and procedures related to the HoT HMIS including all security provisions contained therein. Because programs participating in the HoT HMIS are funded through different streams with different requirements, CITY OF WACO shall maintain ownership of the database in its entirety in order that these funders cannot access data to which they are not legally entitled.

D.6. Data Entry: Profile Information

Policy: Users will designate profile information as open in the client security portion of the profile section of a client record in ClientPoint except in extreme cases. No user will close the profile section of a client record. Some users (depending on the level of access) have the ability to determine whether information in client records is "open" or "closed" to users from other Agencies. Open sections of the record can be seen and changed by users from another agency; closed sections of the record cannot be seen by users from another agency. Because the HoT HMIS is an open system, the default setting on client records has been set to "open."

Procedure: Users will designate all client records as open. Only in extreme circumstances will the record of a client be closed. For example, personal medical or legal history that has been entered into the system; only this section of the client's data is set to closed.

D.7. Data Entry: Assessment Customization

Policy: Partners may have fields available for agency-specific assessment customization. ServicePoint may include fields that can be customized on the Partner level to reflect the program-specific data collection needs of its programs. These fields are part of the ServicePoint program and are available at no additional cost. Agency Administrators will have the ability to customize these fields. Because these fields may be customized at the Partner level, Agency Administrators have the ability to add, delete and change custom fields and do not need the assistance of the HoT HMIS Administrator to perform these customizations.

Procedure: Agency Administrators can be trained to customize the agency-specific fields. However, the HMIS Administrator is available to perform these duties as needed.

D.8. Data Integrity

Policy: HoT HMIS users will be responsible for the accuracy of their data entry. The Agency Administrator will be responsible for ensuring that data entry by users is being conducted in a timely manner and will also ensure the accuracy of the data entered. The quality of HoT HMIS data is dependent on individual users to take responsibility for the accuracy and quality of their own data entry. Agency Executive Directors and/or Agency Administrators are responsible for monitoring the quality of the data for their

own program(s), since that data may be used for reporting and/or monitoring purposes. Data may also be used to measure program efficacy, which impacts funding opportunities during competitive funding processes such as the annual Continuum of Care application to HUD.

Procedure: In order to test the integrity of the data contained in the HoT HMIS, the HoT HMIS Administrator will perform regular data quality checks on the HoT HMIS. The data quality checks will include reporting of "overlaps," periodic verification of data and comparison to hard files, as well as querying for internal data consistency and null values. Any patterns of error will be reported to the Agency Administrator. When patterns of error have been discovered, users will be required to make corrections where possible, correct data entry techniques, improve the accuracy of their data entry, and will be monitored for compliance. Reports will be assessed for data quality and errors will be reported to the Agency Administrator. Other reports for non-HUD funded programs may also be required. The HoT HMIS Administrator reserves the right to add reporting requirements if data quality appears to be decreasing or if reporting requirements change.

D.9. Quality Control: Data Integrity Expectations

Policy: Accurate and consistent data entry is essential to ensuring the usefulness of the HoT HMIS. Partners will provide acceptable levels of timeliness and accuracy. Data quality is an important aspect of the HoT HMIS, and must be maintained at the agency level and by users of the system. The HMIS Administrator will monitor data quality as part of the HMIS management functions.

Procedure: The HoT HMIS Administrator will perform regular data integrity checks on the HoT HMIS.

D.10. Client Data Retrieval

Policy: Any client may request to view, or obtain a printed copy of, his or her own records contained in the HoT HMIS. The client will also have access to a logged audit trail of changes to those records. No client shall have access to another client's records in the HoT HMIS. The data in the HoT HMIS is the personal information of the individual client. Each client has a right to know what information about him or her exists in the database, and to know who has added, changed or viewed this information, and when these events have occurred. This information should be made available to clients within a reasonable time frame of the request.

Procedure: A client may ask his/her case manager or other agency staff to see his or her own record. The case manager, or any available staff person with HoT HMIS access, will verify the client's identity and print all requested information. The case manager can also request a logged audit trail of the client's record from the Agency Administrator. The Agency Administrator will print this audit trail; give it to the case manager, who will give it to the client. The client may request changes to the record, although the agency can follow applicable law regarding whether to change information based on the client's request. A log of all such requests and their outcomes should be kept on file in the client's record.

D.11. Public Data Retrieval / Requests for Data

Policy: The HMIS Administrator will address all requests for data from entities other than Partners or clients. No individual client data will be provided to any group or individual that is neither the Partner that entered the data or the client him or herself without proper authorization or consent. The HMIS Administrator will provide aggregate reports for the larger community. The content of these reports will reflect a commitment to client confidentiality and ethical data use. Any requests for reports or information from an individual or group who has not been explicitly granted access to the HoT HMIS will be directed to the HMIS Administrator. No individual client data will be provided to meet these requests without proper authorization or consent.

Procedure: All requests for data from anyone other than a Partner or a client will be directed to the HMIS Administrator or her designee. As part of the mission to end homelessness in the Heart of Texas, it is the HMIS Administrator's policy to provide aggregate data on homelessness and housing issues in this area. No individually identifiable client data will be reported in any documents.

D.12. Data Retrieval Support

Policy: Partners will create and run agency-level reports. The Agency Administrator has the ability to create and execute reports on agency-wide data. This allows Partners to customize reports and use them to support agency-level goals. The HoT HMIS is to be a tool for the Partners in managing programs and services.

Procedure: The Agency Administrator will be trained in the use of reporting tools by the HMIS Administrator. The HoT HMIS Administrator may assist Agency Administrators with the development of reports/queries for their specific use.

E. Other HMIS Information

E.1. HoT HMIS Security Infrastructure

The following information about how HoT HMIS data is protected from unauthorized access or use is provided here for the benefit of all Partners, public officials, advocates and consumers who are interested in the architecture of security.

Server Hosting at Bowman's Location: CITY OF WACO has co-located the HoT HMIS database and web application servers in Shreveport, Louisiana, at the headquarters of Bowman Systems, L.L.C. This is done to take advantage of Bowman's ability to provide 24-hour security and support for HoT HMIS hardware and software. Co-location means that while City of Waco owns the hardware and software, it pays a monthly maintenance fee for Bowman to provide both server hosting and routine server maintenance.

Bowman employs a full time staff of experts dedicated to keeping their clients up and running, secure, and using the latest technology. This technology includes physical security, Cisco firewalls, authentication through *Verisign* certificates, Windows' secure server technology, and 128-bit encryption of usernames, passwords and all data passing to and from the database. It is the job of the HoT HMIS Administrator and back up personnel to maintain a point of contact between Bowman and City of Waco and keep track of any security issues related to the hosting of the HoT HMIS database.

Physical Attack: The database server and web server are located in a physically secure building where security guards are employed to monitor security from 7:00 a.m. to 7:00 p.m. Monday through Friday, and from 8:00 a.m. to 4:00 p.m. on Saturdays. During off hours, a card key is required to enter the building. Within the building, the Bowman offices are also locked with a separate key structure. The server itself deploys the standard security measures to prevent unauthorized local access.

Network Attack: Bowman uses Cisco firewalls to prevent unauthorized remote access to the database server. A firewall is a software application that blocks all incoming electronic traffic except traffic that is explicitly permitted. Permissions are configured manually by network administrators. This combination of firewalls and virus protection software will detect and prevent most viruses, Trojan horses, worms, malicious mobile codes or email bombs from damaging our database.

Denial of Service: The combination of firewalls and routine monitoring of network traffic by skilled professionals (Bowman network administrators) will detect and prevent an attacker from flooding our server to the point of failure.

Exploitation of Operating System Vulnerabilities: As part of the maintenance contract, network administrators at Bowman are responsible for updating the server with the latest software patches and fixes of known operating system weaknesses. Keeping abreast of software patches and reports of new vulnerabilities is the best way to avoid falling prey to these attacks.

Exploitation of Software Vulnerabilities: Because City of Waco relies on the same company who created the *ServicePoint* software to host its server, City of Waco is assured that security holes discovered in the *ServicePoint* software will be addressed by technicians with access to timely and accurate information about the core program. City of Waco does not need to rely on second- or third-hand software alerts or the installation of patches and upgrades by network administrators unfamiliar with the product. This is a great advantage in combating application-specific security issues. **User Falsification:** Using a public-key infrastructure and signed digital certificates, the

latest security technology available, Verisign provides a safe and reliable method of authenticating users. These methods, while they do employ traditional user names and passwords at their base, also encrypt data and provide a software-enabled check and counter-check methodology that make stealing identities or masquerading as an authorized user virtually impossible. In addition, these methods produce one-time use session keys that foil a replay attack, as user credentials will never be signed and encrypted in precisely the same way twice.

Data Traps: Verisign provides 128-bit SSL encryption of all data passing from agency to server, or server to agency. Encryption is the translation of data from a readable "clear text" to an encoded hash using complex mathematical algorithms. SSL, short for secure sockets layer, is a data transport protocol that encrypts data using a public-key infrastructure. It is estimated that data encrypted with 128-bit encryption would take at least a trillion years to crack using today's technology. When data is encrypted, even if packets could be captured or recorded as they travel across the Internet, they could not be decoded and read.

Server Falsification: The public-key infrastructure provided by Verisign provides not only authentication of the agency, but also authentication of the web site, and hence, authentication of the hosting server. Authentication is provided through digital certificates verified by Verisign, and is an integral part of the login process. Mutual authentication prevents a rogue web site from masquerading as our secure web site and drawing sensitive data.

Social Engineering: These are attacks in which a social situation (for example, a customer service call from a third-party company) is manipulated so that an unauthorized user gains access to protected information, such as client data, or user names and passwords. The biggest deterrent to social engineering is clear policies and procedures. It is much harder for users to be manipulated into providing confidential information if they have clear and thoughtful rules to follow when providing such information. City of Waco provides clear policies and procedures around issues of ServicePoint data confidentiality and confidentiality of user names and passwords. These policies and procedures are designed to speed problem resolution and minimize the chance of a user being manipulated into divulging confidential data through confusion or a sincere desire to help someone in need.

Misuse of Privileges: ServicePoint provides several levels of user access to the database. Each level has access to a particular subset of information and particular abilities to manipulate information. City of Waco provides clear "job descriptions" for each level of access, to ensure that each user is assigned an appropriate level of access. City of Waco provides clear protocol and procedures for handling data needs and requests that fall outside of a particular user's job description. Finally, City of Waco will provide clear procedures for handling changes in access levels and users, as well as for password recovery and other access issues. These procedures will be designed to clarify and streamline the daily work of legitimate users, and minimize the chance of legitimate users misusing privileges even towards legitimate ends.

Local Physical Attack: Agency computers are necessarily more physically vulnerable than our central server. As no ServicePoint data is stored on the local computer the physical vulnerability of these computers does not constitute a significant threat to client confidentiality regarding this data. However, any user access data, such as a password, that is stored on a computer or in a written file, does constitute a risk to client confidentiality. Even if a computer or server are stolen, (one key), the data is still safe and remains unreadable.

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Attachment A

PARTNER PARTICIPATION AGREEMENT

Heart of Texas Homeless Management Information System

HoT HMIS:

The Heart of Texas Homeless Management Information System (Hot HMIS) is a network of organizations committed to improving service access and the development of services to address the unmet needs of residents living in the Heart of Texas Region. HoT HMIS utilizes a client database that allows for the tracking of clients to determine the services a client has already received and services the client needs that may be lacking in our community. The HoT HMIS provides the ability to track homeless individuals in the community as well as their progress. The goal of the HoT HMIS is to have all organizations that provide services to homeless and low income individuals and their families identified in its database, and to have as many of these service providers as possible utilizing the system.

The HoT HMIS was created to improve the delivery of services to individuals who have unmet needs. The system is designed to allow for referrals, evaluating service needs, case management, client tracking, management of homeless information, creating reports and regional analysis of service delivery. Information in the HoT HMIS should be used ONLY for the above stated purposes. Any other use of this information is prohibited. Agencies should communicate to users the importance of maintaining the confidentiality of client data in the HoT HMIS.

The HoT HMIS uses the ServicePoint software, which is a product of Bowman Systems, L.L.C. The ServicePoint software is an Internet-based application providing real-time access. All that is needed to log into the system is Internet access, a web browser, a user ID and password. Real-time access provides immediate update of information entered into the system.

For an agency to be a HoT HMIS Partner, an administrator of that agency/organization must sign this Partner Participation Agreement form detailing the specific expectations of the partner organizations. All users of the HoT HMIS will be required to complete and sign a User Confidentiality Agreement.

As a HoT HMIS Partner, agencies have certain obligations and requirements that must be followed in order to protect the rights and interests of HoT HMIS clients. Below are performance standards required of each agency and its employees who use the HoT HMIS. It is the agency's responsibility to ensure that each user is familiar with the requirements of the system.

Client Rights:

In order for information to be shared in the HoT HMIS, the client or his/her legal guardian must give consent to release their information to participating HoT HMIS Partners. The client has the right to refuse to release his/her information. If the client refuses to do so, this in no way affects the client's eligibility for services at any agency. Refusal to give consent to release information requires that you enter client information and mark it as RESTRICTED in the system, so that no one, other than your agency and the system administrator(s), can access this information.

Client information may be used only for purposes specified by the client. Client information may not be shared for purposes other than those related to a user's job duties. Such unauthorized use is prohibited and will result in termination of access to the system by a majority vote of the HoT HMIS Advisory Committee.

User Accounts:

Each user of the HoT HMIS will be assigned a user ID and password. The user may **not** share the ID and password with anyone. This will assure that only authorized persons are using the system. The user will be held accountable for all actions performed by the assigned ID. Each user is required to read and sign a User Confidentiality Agreement before he/she is given access to the system.

Training:

It is the responsibility of each Agency Administrator to ensure that each of its users is knowledgeable about the purpose of HoT HMIS, and knows how to correctly use the system.

Each agency is required to assign at least one person from their agency to be an Agency Administrator who will serve as a contact with the System Administrator of the HoT HMIS. This person will be required to attend training and is expected to obtain the knowledge necessary to train other users in that agency. This person will also relay problems and suggestions to the System Administrator of HoT HMIS.

Data Integrity:

The Partner Agency has the responsibility of ensuring the accuracy of the information entered into the system. The agency must be sure that its employees have been properly trained, made aware of the importance of recording accurate data and respect the confidentiality of clients in the system.

Reporting and Analysis:

One of the goals of the HoT HMIS is to track clients and the services they receive. This information can be used to determine what additional services are needed throughout the community. The information in the system will be used to produce reports about programs and services. As a HoT HMIS Partner, it is important that you record each and every potential client in the HoT HMIS so that HoT HMIS Administrators can track unmet needs as well as those that were met. This is crucial in order for us to perform an accurate analysis of community services and programs. The homeless providers that have been identified and trained to use the HoT HMIS should be aware that the system will be used to create reports on the homeless and the services that are provided to them. This aggregate data will be collected and used by the Heart of Texas Homeless Coalition to assist in determining the number of homeless persons in the community, among other statistics.

Fees:

As a member of HoT HMIS, each agency will be required to pay applicable fees. The City of Waco is providing the administration and maintenance of the HoT HMIS, including administration and maintenance of the databases, training, software support, negotiation of technology contracts and will serve as liaison to the HoT HMIS vendor. The annual fee is paid to CITY OF WACO in exchange for these services.

- * Fees based on the following:
 - \$250 Activation Fee for every new license
 - \$150 License Fee for every Single Licensed Agency
 - \$150 License Fee for each license for Multiple Licensed Agency
 - \$90 ART License Fee annually per license

Termination of Access:

When participating agencies and/or users violate guidelines, HoT HMIS Administrator may terminate access to the system based on a majority vote of the HoT HMIS Advisory Committee.

An agency may choose to withdraw from the HoT HMIS with a written notice of desire to do so. An agency may choose to withdraw a user from the system for any reason deemed appropriate. In this case, it is required that the partner agency inform the HoT HMIS Administrator of the revocation of the particular user's access to the system.

Agreement Effective Date:

This agreement becomes effective on the date it is signed. Actual access to the system becomes effective once this Partner Participation Agreement and System User Confidentiality Agreement are signed, user names and passwords have been assigned and training has been completed. Once access to the system has been granted, it is effective for the term of the project, unless terminated for disciplinary actions or by written notice of a desire to withdraw from the HoT HMIS. Access to the system will be automatically renewed annually with submission of the agreed upon annual fee to HoT HMIS Administration.

This agreement and other HoT HMIS documents may be amended to comply with changes in state and federal legislation as needed.

Agreement:		
As the Executive Director (or Designee) of	further understand that failure to follow all guideline	m. I
Agency Name		
Executive Director (or Designee) Signature	Date	
HoT HMIS Administrator Signature		

Attachment B

Heart of Texas HMIS **USER LICENSE CONFIDENTIALITY AGREEMENT**

Client Confidentialit	v:
-----------------------	----

Heart of Texas HMIS Administrator Signature

Client Confidentiality:		
to improving service acces Heart of Texas Region. A access to confidential info times treat this informatic and/or organizations for t	ss and the development of service s a representative of a HEART OF rmation, some of which is persona on as confidential, and will disclose	stem (HoT HMIS) is a network of organizations committed as to address the unmet needs of residents living in the TEXAS HMIS partner organization, I understand I have all and is, by law, considered confidential. I will at all a this information only to explicitly authorized individuals will not access or share confidential information Initial:
I understand that client co ensure that all client infor	onfidentiality is of utmost importar mation is handled in strict confide	nce; therefore, I agree to take the necessary measures to ence. Initial:
HEART OF TEXAS HMIS	Access:	
HEART OF TEXAS HMIS.	I understand that I will be held ac	ord that is to be used ONLY by myself to access the ccountable for all actions and activities produced by my ne, and I will not use the ID and/or password assigned to
someone eise.		Initial:
		ing data in a manner inconsistent with my job duties. at may compromise the integrity of the system. Initial:
		malfunction or knowingly alter data without authorization I further agree to report any suspected misuse or lapse in
the security system.		Initial:
Statement of Understa	nding:	
and understand the relatic understand that maintaini TEXAS HMIS. I acknowle above. I further understand that HMIS privileges.	onship of HEART OF TEXAS HMIS ng client confidentiality is my first dge that I have read, understand failure to follow these guidelines r	I the purpose and intent of the HEART OF TEXAS HMIS, and the organization with which I am employed. I duty and largest responsibility as a user of the HEART OF and voluntarily agree to follow the guidelines set forth may result in possible termination of HEART OF TEXAS
By signing below I also ac	knowledge that I have received a	nd read Hot HMIS PSOP Manual.
System User Name	Email address	System User ID
System User Signature		Date

Date

Attachment C

HEART OF TEXAS HMIS

RELEASE OF INFORMATION FORM $oldsymbol{ROI}$

Purpose:
The Heart of Texas HMIS is a network of organizations committed to improving service delivery to people in need. By giving your consent to release your client information and information on members of your household to the HEART OF TEXAS HMIS network, you are agreeing to participate in the HEART OF TEXAS HMIS Continuum of Care program and allow the HEART OF TEXAS HMIS organizations to share and manage this information in an effort to coordinate and improve delivery of needed services, and to avoid duplication in providing basic intake information.
Consent:
This release includes all partners of the HEART OF TEXAS HMIS network.
I,
I also understand that the information I provide, as well as information about the services I and my household receive, will be kept confidential by all HEART OF TEXAS HMIS organizations as required by law. I further understand that any information I provide may be used for statistical purposes by the HEART OF TEXAS HMIS network and/or any or all of its partner organizations, and that HEART OF TEXAS HMIS and its partner organizations will maintain the confidentiality of any and all personally identifiable information as required by law.
I understand that this consent is effective for <i>three years</i> from the date in which it is signed. Furthermore, I understand that this consent can be revoked at any time by completing a release withdrawal form at any HEART OF TEXAS HMIS agency requesting revocation of my consent. This ROI is agency specific. Therefore one will need to be completed for each HoT HMIS participating agency from which I receive services.
I understand that this release is optional, and that I and my household can still apply for and receive services, provided I am <i>or</i> the client is, and the household members are eligible, without signing this form. I understand that if I choose not to sign this form, the information will be entered into the HEART OF TEXAS HMIS system in a manner that will allow no other agency to access these client records. I understand that this information will, however, be used for statistical reporting purposes, in a non-identifying manner.
I have read, understand, and voluntarily consent to the release of my or the client's, and members of the household information to HEART OF TEXAS HMIS partners:
Client (or legal guardian) Signature Date
Client Social Security Number Relationship to client (if applicable)
HEART OF TEXAS HMIS Agency Employee Signature Date
☐ Check here if verbal consent received. HEART OF TEXAS HMIS Agency Employee must sign and date above.

Attachment D

HOMELESS MANAGEMENT INFORMATION SYSTEM



THIS NOTICE DESCRIBES HOW INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION.

PLEASE READ IT CAREFULLY.

Our Duty to Safeguard Your Protected Information

collects information about those who access our services. When we meet with you we will ask you for information about you and your family and enter it into a computer program called the Heart of Texas Homeless Management Information System (HoT HMIS). Although HMIS helps us to keep track of your information, individually identifiable information about you is considered "protected information". We are required to protect the privacy of your identifying information and to give you notice about how, when and why we may use or disclose any information you may give us.

We are also required to follow the privacy practices described in this Notice, although _____ reserves the right to change our privacy practices and the terms of this Notice at any time. You may request a copy of the new notice from any Heart of Texas HMIS Agency.

How We May Use and Disclose Your Information

We use and disclose collective information for a variety of reports. We have a limited right to include some of your information for reports on homelessness and services needed by those who are homeless. Information that could be used to tell who you are will never be used for these reports. We will NOT turn your information over to a national database. For uses beyond reports, we must have your written consent unless the law permits or requires us to make the use or disclosure without your consent. Please review the Client Release of Information Form for details. You must sign this form before we can use your information, but you do not have to sign the form in order to receive services.

Attachment E

Universal Data Elements

HMIS Universal Data Elements are elements required to be collected by all projects participating in HMIS, regardless of funding source.

The Universal Data Elements establish the baseline data collection requirements for all contributing CoC projects.

They are the basis for producing unduplicated estimates of the number of people experiencing homelessness, accessing services from homeless assistance projects, basic demographic characteristics of people experiencing homeless, and patterns of service use, including information on shelter stays and homelessness over time.

The Universal Data Elements are the foundation on which the Annual Homeless Assessment Report (AHAR) is developed. The AHAR provides Congress the national estimates of the current state of homelessness across the United States and the use of homeless assistance programs. It is used locally to inform state and local communities on how their specific homeless information compares nationally. The AHAR is used by the U.S. Interagency Council on Homelessness to measure progress towards goals specified in *Opening Doors* and by all of the federal partners to inform homelessness policy. Universal Data Elements also help local communities to better target resources, and position programs to end homelessness.

The Universal Data Elements are:

3.1	Name		
2.2	Social Society Niverhou (SS	3.917	Living Situation
3.2 Data (Social Security Number (SS Quality question also)	3.10	Project entry Date
3.3	Date of Birth	3.11	Project Exit Date
3.4	Race (Primary)	3.12	Destination
3.5	Ethnicity	3.13	Personal ID
3.6	Gender	3.14	Household ID
3.7	Veteran Status	3.15 House	Relationship to Head of hold
3.8 have d	Disabling Condition (Do you a disability of long duration?	3.16	Client Location

Program Specific Data Elements

Program Specific Data Elements differ from the Universal Data Elements in that no one project must collect every single element in this section. Which data elements are required is dictated by the reporting requirements set forth by each Federal partner for each of its programs. A Partner may require all of the fields or response categories in a data element or may specify which of the fields or response categories are required for their report. This section is organized to illustrate which Program Specific Data Elements are required by more than one Federal Partner and which are required by only one of the Federal Partners.

Local CoCs may elect to require all contributing continuum projects to collect a subset of the data elements contained in this section to obtain consistent information across a range of projects that can be used to plan service delivery, monitor the provision of services, and identify client outcomes. However, these data elements do not constitute a client assessment tool, and projects must develop their own data collection protocols in order to properly assess client service needs.

The following Program Specific Data Element; are required by more than one Federal

Partner:

4.1 Housing Status 4.11 Domestic Violence 4.2 Income and Sources 4.12 Contact 4.3 Non-Cash Benefits 4.13 Date of Engagement 4.14 Services Provided 4.4 Health Insurance 4.5 Physical Disability 4.15 Financial Assistance Provided 4.6 Developmental Disability 4.16 Referrals Provided 4.7 Chronic Health Condition 4.17 Residential Move-In Date 4.8 HIV/AIDS 4.18 Housing Assessment Disposition 4.9 Mental Health Problem 4.19 Housing Assessment at Exit 4.10 Substance Abuse

(UDE are highlighted in **RED** throughout the system and must be answered for ALL clients)



8/28/17

HUD Continuum of Care Grant Waco,TX

To Whom It May Concern;

This letter is being provided to you as part of the Continuum of Care grant being submitted on behalf of the City of Waco.

Waco Housing Authority and Affiliates first adopted the Homeless Preference for its Public Housing and HCV (Section 8) programs on the February 17, 2015.

The preference clearly states applicants must meet the HUD definition of homelessness or the McKinney- Vento definition of homelessness.

In addition, the President/CEO chairs a subgroup of the Heart of Texas Homeless Coalition that is the Permanent Housing Task Force. The task force looks for ways to deal with common barriers to permanent housing for those who have challenges finding housing in our area.

As far as the homeless preference we have 60 vouchers for VASH (Veteran Assisted Supportive Housing). We had housed an average of 57 in 2016 with a Leased up average of 95%. In 2017 we housed an average of 59 veterans for a Leased Up average of 98%. Presently we are at 63 housed.

Please feel to contact me with any additional questions. I can be reached at (254) 752-0324 ext 280.

Sincerely,

Milet Hopping, President/CEO

Waco Housing Authority and Affiliates

mileth@wacopha.org

K13-009

STATE OF TEXAS § MEMORANDUM OF UNDERSTANDING MCLENNAN COUNTY 8

Memorandum of Understanding between the Heart of Texas Homeless Coalition, hereinafter called "Coalition", and the City of Waco, Texas, herein after called the "City", collectively referred to as the "Parties" for the purposes provided herein.

A. RECITALS

The Coalition is a non-profit organization whose purpose is to eliminate gaps in available services to homeless individuals. The Coalition is committed to developing a seamless Continuum of Care model that will provide all homeless individuals an opportunity to access needed services.

The City is the entity that provides Homeless Management Information Systems ("HMIS") support to the Coalition and participating provider agencies. The Parties have agreed to the following:

B. PURPOSE

The purpose of this Memorandum of Understanding ("MOU") is to provide the framework for a partnership arrangement between the Coalition and the City to provide and manage HMIS services for the Coalition.

C. AREAS OF COOPERATION

The activities shall include but not be limited to the provision of management of the HMIS database, provision of initial and ongoing training and technical assistance to participating service providers, and provision of routine and ad hoc reports to the Coalition.

The City shall:

- 1. Review participating provider agency's records not less than once per year to assess the validity of data input, by cross-checking records against HMIS.
- 2. Maintain the HMIS system in accordance with the local policies and standard operating procedures manual.
- 3. Train new Homeless Service Providers on HMIS utilization and best practices within one month of enrolment in HMIS and provide ongoing technical assistance as needed.
- 4. Maintain, during the term of this MOU, at least two (2) trained staff who are knowledgeable about the HMIS system.

D. IMPLEMENTATION OF THE MOU

- 1. The Chairperson of the Coalition and the City Manager of Waco shall make the necessary arrangements to ensure satisfactory implementation of this MOU as described.
- 2. The parties agree to communicate systematically to exchange views and report on accomplishments with regard to this MOU.

E. GENERAL PROVISIONS

1. DURATION

This MOU shall be valid upon signature by both parties and until such time as the City is no longer the lead agency managing HMIS services.

1.1 The MOU may be modified and/or amended at any time by the signatories or their successors, by mutual written MOU (through formal amendments).

2. CONTACT POINTS/COMMUNICATION AND NOTIFICATION

For purposes of communications or notices with respect to this MOU, the Coalition shall be represented by Barbara Tate, Chairperson, and the City of Waco by Larry Groth, City Manager.

3. STATUTORY COMPLIANCE

3.1. This MOU is not expected to create a legal and binding obligation to expend funds or resources by either party, but is a statement of bona fide intent of the Parties. It sets forth the entire understanding of the Parties in respect of the collaboration considered.

F. SIGNATORIES

In witness thereof the Parties hereto have signed the MOU in 2 original copies on the date(s) herein below indicated.

Larry Groth, P.E.

City Manager

City of Waco

Chairperson

Heart of Texas Homeless Coalition

Date



HEART OF TEXAS HOMELESS COALITION

Advocacy, Assistance & Acknowledgment

TX 604 Waco/McLennan County

CONTINUUM of CARE (CoC)

Governance Charter And Policy and Procedures

Amended 2/17/2017

Revised Format Approved 9/15/2017

TX 604 Waco/McLennan County CONTINUUM of CARE (CoC) Governance Charter

Revised Format Approved September 15, 2017

The mission of the Continuum of Care is to lead and implement strategies and resources to end homelessness.

CoC Governance Structure

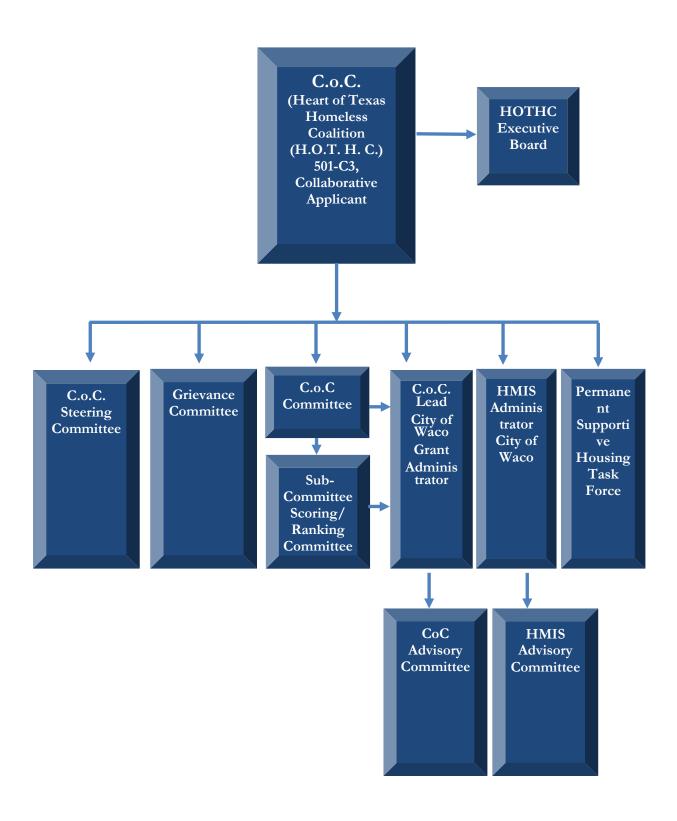
The Charter identifies the CoC's governance structure, including CoC Lead/Collaborative Applicant and HMIS Lead Agency designations and purposes. The Charter also describes the purposes of the CoC Board and other committees.

The name of the affiliation is the TX 604 Waco/McLennan County Continuum of Care (CoC) which operates in concert with the Heart of Texas Homeless Coalition (HOTHC), recognized by the IRS as a 501c3 non-profit organization.

The geographic area of the TX 604 CoC includes 6 counties in the state of Texas: McLennan, Hill, Bosque, Limestone, Freestone, and Falls. Within these counties, the Heart of Texas Homeless Coalition (HOTHC) conducts local CoC planning, housing and service development and delivery, and evaluation, as well as CoC-wide activities through the general membership, HOTHC Board, and committees.

The TX 604 CoC consists of:

- CoC General Members
- HOTHC Board of Directors
- CoC Standing Committees
- CoC Ad Hoc Committees
- CoC HMIS Lead
- CoC Lead Agency/Collaborative Applicant



CoC General Membership

The General Membership represents persons experiencing or at risk of homelessness, providers of homeless services, and other relevant organizations and community stakeholders to establish a Continuum of Care and a CoC Board, and to fulfill the CoC's responsibilities, as required by HUD. The responsibilities of the CoC may be completed by the membership at large, or through delegation to the CoC Board, CoC committees and work groups, the CoC Lead Agency, or other groups.

CoC General Members are those organizations and persons participating in local homeless planning efforts in the TX 604 CoC's geographic area, including; persons participating in the work of the HOTHC Board, and/or committees. Homeless and/or formerly homeless individuals, organizations and other interested individuals make up the lead workgroups responsible for managing community planning, coordination, and evaluation to ensure that the system of homeless services and housing rapidly ends people's homelessness permanently. This includes planning for the use of HUD HEARTH CoC resources and coordinating these funds with other resources in their communities. General Membership includes representatives of relevant organizations, e.g., homeless services providers, victim services providers, medical services, law enforcement, school districts, and agencies serving other homeless subpopulations.

HOTHC Board

The CoC HOTHC Board is the primary decision-making body for the TX 604 CoC. Board members determine the policy direction of the CoC and ensure that the CoC fulfills its responsibilities as assigned by HUD. Additionally, the Board oversees and approves the work of CoC committees and workgroups. The Board will consist of a minimum of nine members to a maximum of fifteen members The CoC will ensure that the CoC HOTHC Board, its chair, and any persons acting on behalf of the Board comply with a code of conduct and with conflict-of-interest requirements and recusal processes. The CoC HOTHC Board will strive to ensure broad representation among the 15 positions, including community stakeholders from around the CoC's geographic area and agency staff representing the major homeless subpopulations. Individual Board members may represent multiple sectors or stakeholders. Board members and officers are elected by the full CoC membership at the CoC General Meeting held in January of each year. Board members will serve staggered terms of two years so that every year, half of the positions will stand for election. See the HOTHC Bylaws (Appendix A).

CoC Lead

The City of Waco has been selected by the TX 604 CoC to serve as the CoC Lead Agency to provide staff support to the Board and committees that constitute the CoC. The lead agency performs a variety of necessary functions such as performance monitoring, engagement and eduction of stakeholders, planning activities to improve the housing crisis response system, and submission of the annual collaborative CoC Program grant application. The CoC Lead Agency manages all aspects of the CoC, including ensuring all federal CoC Program requirements are met.

CoC HMIS

The TX 604 CoC has designated the City of Waco as lead in data management. Bowman is the HMIS system utilized for meeting HUD client level data collection and reporting.

Emergency Solutions Grant (ESG) Lead

One agency, Salvation Army, currently applies for ESG funding. Data from services provided are
included in HMIS and this organization also participates in CoC strategic planning and inclusion
in the Consolidated Plan. Project funding is approved by the State of Texas, HOTHC, and the City
of Waco. Monitoring performance is provided by the CoC Committee.

CoC Standing Committees

- The CoC Committee is a standing committee which serves as a means for the Board, Corporation, and Membership to concentrate efforts to sustain and improve the CoC Programs. CoC Committee responsibilities include; review of CoC Policieand Procedures annually, review tools and recommend prioritization methodology for the collaborative grant application process, perform quarterly monitoring of program performance and identifies and recommends strategies for meeting community needs or gaps in services. Stakeholders representing sectors of the community comprise this committee including; non-profit homeless providers/business, public housing, school districts, unaccompanied youth, social services providers, universities, affordable housing developers, victim services, government, advocates, mental health agencies, hospitals, law enforcement, substance abuse, veteran service providers, and local foundations.
- The Scoring and Ranking Committee is a sub-committee of the CoC Committee which utilizes
 tools and policies and procedures to score and rank projects for the HUD collaborative
 application. This committee shall consist of an uneven number of voting members, with a
 minimum of five members. This committee meets annually. Members of this committee must
 have no direct or indirect conflict of interest and must abide by the CoC Code of Conduct,
 Conflict of Interest and Recusal Policies (Exhibit A)
- The Grievance Committee receives from the CoC Lead written grievance from applicant organizations of the collaborative grant application which has not been resolved through CoC Lead response. The Grievance Committee will review the grievance for any violation, improper application, disparity in the application of rules or process which results in the organization being adversely affected by the score and rank assigned. The committee will send a written response to the CoC Lead who will notify the organization of results of the review. Members of this committee must have no direct or indirect conflict of interest and must abide by the CoC Code of Conduct, Conflict of Interest and Recusal Policies. (Exhibit A)
- The Steering Committee receives from the CoC Lead written grievance from applicant organization of the collaborative grant application which has not been resolved through CoC Lead response or review and response by the Grievance Committee. The Steering Committee will review the grievance and any other additional information submitted by the applicant organization for any violation, improper application, disparity in the application of rules or process which results in the organization being adversely affected by the score and rank assigned. The committee will send a written response to the CoC Lead who will notify the organization of results of the review which are final. If not satisfied, the applicant organization may at that point submit application directly to HUD. Members of this committee must have no direct or indirect conflict of interest and must abide by the CoC Code of Conduct, Conflict of Interest and Recusal Policies. (Exhibit A)

- Permanent Supportive Housing Task Force is a committee designed to carry out CoC goals of creating greater housing opportunities for individuals and families experiencing homelessness. This committee meets monthly.
- The CoC Advisory Committee provides guidance to the HOTHC Board, CoC Lead, and Membership on aspects of planning, implementing, and evaluating provision of an effective crisis housing response system.
- The **HMIS Advisory Committee** provides guidance to the HOTHC Board, CoC Lead, and Membership on data management as a tool for planning, program compliance and evaluation of community needs and gaps in services.
- CoC Ad Hoc Committees are formed by the CoC HOTHC Board as short-term workgroups on an
 as-needed basis to accomplish certain tasks. Ad hoc committee membership will vary depending
 on the particular needs of the group. Each ad hoc committee will be led by a Chair and a CoChair. Other committee members may be other members of the HOTHC Board, General
 members, and/or other stakeholders.

While decisions for the Continuum will be made by the CoC General Membership and/or HOTHC Board, the work of the Continuum will generally be carried out by committees and, as appointed by committees, subcommittees. Committees may make recommendations regarding policies and procedures for voting approval by the CoC HOTHC Board. The HOTHC Board will establish standing committees as necessary to ensure all CoC responsibilities are fulfilled according to HUD regulations.

Exhibit A



TX 604 Waco/McLennan County CONTINUUM of CARE (CoC)

Code of Conduct, Conflict of Interest And Recusal Policies

Section 1 - Purpose

The purpose of the Code of Conduct, Conflict of Interest, and Recusal Policies is to maintain high ethical standards and establish procedures which guide the recusal process and administrative or disciplinary actions for violations. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

Section II - Procedures

Conflict of Interest

An officer, member, member of a committee, agent or hired staff, including staff hired through MOU or Pass Through Agreement, with governing board delegated powers must disclose the existence of possible direct or indirect financial, or material gain to the governing board or committee with governing board delegated powers. This includes real or apparent conflicts of interest that may arise among officers, employees or agents, or any member of his or her immediate family, his or her partner or an organization that employs any of the indicated parties. This includes organizational conflicts of interest.

After disclosure, he/she may choose to voluntarily relinquish voting rights or abstain from serving on a committee relevant to the award of grants, provision of financial benefits, transaction or arrangement. If further determination is warranted, he/she shall leave the governing board or committee meeting while determination of a possible conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

If a conflict of interest exists, the individual with the association will be required to abstain from voting or serving on a committee with governing board delegated powers.

If the governing board or committee has reasonable cause to believe an officer or committee member has failed to disclose actual or possible conflicts of interest, it shall inform the individual of the basis for such belief and afford the individual an opportunity to explain the alleged failure to disclose. If, after hearing the individual's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action which could include ensuring the individual with the association abstains from voting or serving on a committee with governing board delegated powers up to dismissal of the individual from board or committee membership.

Acceptance of Gifts or Favors

An officer, member, member of a committee, agent or employee, including staff hired through MOU or Pass Through Agreement, may neither solicit nor accept gifts or gratuities, favors or anything in excess of minimum value from potential grant awardees, contractors, or parties to sub agreements where the receipt would either compromise impartial performance or give the appearance of compromising impartial performance.

If the governing board or committee has reasonable cause to believe an officer, committee member, agent or employee has violated this policy, it shall inform the individual of the basis for such belief and afford the individual an opportunity to explain the alleged violation. If, after hearing the individual's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has violated policy, it shall take appropriate disciplinary and corrective action which could include dismissal of the individual from board or committee membership.

Fraud Intolerance

The term fraud refers to, but is not limited to: intentionally entering false or erroneous information into electronic software systems; any dishonest or fraudulent act; forgery or alteration of any official document; misappropriation of funds, supplies, or Continuum of Care materials; improper handling or reporting of money or financial transactions; profiting by self or others as a result of inside knowledge; destruction or intentional disappearance of records, furniture, fixtures, or equipment; accepting or seeking anything of material value from vendors or persons providing services or materials to the Continuum of Care for personal benefit; or any similar or related irregularities.

Fraudulent acts will not be tolerated and may result in termination from Board membership. Fraudulent acts will be pursued to the fullest extent and may result in criminal charges.

A Board Member who has reason to believe that there may have been an instance of fraud, improper action, or other illegal act in connection with a Continuum of Care program, function or activity shall report it immediately to the TX 604 HOTHC Board.

Improper actions are actions undertaken by a Board Member in the performance of their official duties that: (a) are in violation of any federal, state, or local law; or (b) constitute an abuse of authority; or (c) create a substantial, specific danger to public health or safety; or (d) misuse of Continuum of Care funds; or (e) represent a conflict of interest.

Reported incidences will be investigated as expeditiously as possible by the Governance Committee and/or Governance Committee Co-Chair members as appropriate. When an investigation confirms that fraud or an illegal act(s) has occurred, appropriate corrective action will be taken.

The Code of Conduct, Conflict of Interest and Recusal Policies form will be signed annually by HOTHC Board members, and committee and sub-committee members with board delegated decision-making responsibilities. (Appendix A)

I attest the Code of Conduct, Conflict of Interest and Recusal Policies were revised and adopted on by the TX 604 HOTHC Board.

Melinda Bonds, Chairman

Malinda Bondo

Heart of Texas Homeless Coalition

254-752-3451

Melinda.Bonds@hotrmhmr.org

P. O. Box 23025

Waco, TX 76702

TX 604 Waco/McLennan County CONTINUUM of CARE (CoC)

Policies and Procedures

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Section One: Continuum of Care Membership and Responsibilities (24 CFR part 578.5(a) and 578.7)

Policy:

The TX-604 Waco/McLennan Continuum of Care (CoC) will be established by representatives from relevant organizations within the geographic area of the CoC. Relevant organizations include nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans, domestic violence victims, youth and homeless and formerly homeless individuals.

The CoC geographical area covers six counties as designated by the U.S. Department of Housing and Urban Development (HUD): McLennan, Falls, Bosque, Hill, Limestone, and Freestone.

The TX-604 Waco/McLennan County CoC will establish and follow protocols for full CoC Assembly meetings, including:

- 1. Provide a public means of extending the invitation within the CoC's geographic area at least annually.
- 2. Establish committees, subcommittees, or workgroups/taskforces to fulfill the CoC's responsibilities
- 3. Document and adhere to a process of appointing members to committees, subcommittees, or workgroups/taskforces

Procedure:

The Heart of Texas Homeless Coalition (HOTHC) Board and their designees will contact representatives of relevant organizations to solicit their membership in the CoC.

- 1. Each member of the CoC is responsible for helping to recruit new members.
- 2. All members will contact representatives of relevant organizations to solicit their membership in the CoC.
- 3. All CoC members who provide homeless services will identify and contact consumers who are or were homeless to invite their participation in the CoC.
- 4. Open invitation to join the CoC will remain posted on the HOTHC website.
- 5. An invitation for membership will be sent from the HOTHC listserv annually.
- 6. At least annually, the HOTHC social media sites will include an invitation to join the CoC.

Membership may be on an individual or agency basis. No more than two representatives from one agency will be eligible to vote at a general membership meeting.

Individual membership dues are \$15 per year; \$25 per year for nonprofit organizations; and \$50 per year for profit entities. State agencies are exempt from paying dues. Individual employees are encouraged to register as individual; however, this will not affect voting privileges.

Current agency membership dues are not a requirement in order to be eligible to vote at general membership meetings. In order to be a voting representative, an individual or agency must attend a

minimum of seven meetings during a twelve month period. Members must be present to vote and proxy voting is not allowed at General Membership meetings.

Control of this corporation shall rest with the membership. Any action of the board of directors shall be subject to review by the membership on request of any member at the regular meeting. An action of the board of directors may be altered or rescinded by two-thirds vote of the membership present at a regular meeting.

Regular meetings of the membership shall be held each month unless the board of directors shall determine otherwise. In no event shall fewer than eight (8) such meetings be held in any one fiscal year. All meetings are open meetings regardless of status of dues. CoC Assembly agendas will be posted on the Heart of Texas Homeless Coalition (HOTHC) website at www.heartoftexashomeless.org one week prior to the meetings.

The membership meeting in January shall be designated as the Annual Meeting for the election of officers and members of the board of directors.

Special meetings of the members may be called by the Chairperson, the board of directors or upon written request to the Chairperson signed by five (5) or more members.

Section Two: Continuum of Care Board Requirements (24 CFR part 578.7(b))

Policy:

The TX-604 Waco/McLennan County Continuum of Care (CoC) will follow written processes to select the Heart of Texas Homeless Coalition (HOTHC) Board of Directors and the CoC Committee of the Board of HOTHC to act on behalf of the CoC. (HOTHC Bylaws Appendix B) The CoC will review, update, and approve the selection process at least once every five years.

The HOTHC Board of Directors will be representative of the relevant organizations and of projects serving homeless populations and include at least one homeless or formerly homeless individual.

The CoC will ensure that members of the HOTHC Board, CoC Committee, sub-committees and any persons acting on behalf of the CoC Committee comply with the Code of Conduct, Conflict of Interest and Recusal Policies. HOTHC Board members as well as officers, agents, staff, and any committee members with governing board delegated powers will sign a Code of Conduct, Conflict of Interest, and Recusal Policies Form annually.

The CoC Committee of the Board is a standing committee of the HOTHC Board of Directors and shall serve as a means for the Board, Corporation, and Membership to concentrate efforts to sustain and improve the CoC Programs. The CoC Committee of the Board shall consist of an uneven number of voting members, with a minimum of seven, of whom no more than five shall be members of the HOTHC Board of Directors. It shall also include at least three non-voting members.

Procedures:

Membership requirements to serve on the HOTHC Board of Directors are detailed in the HOTHC By-laws.

At least once every five years, the CoC membership will schedule a review of the board selection process for the CoC's annual meeting.

To serve on the CoC Committee of the Board members must meet the following minimum requirements:

- 1. Members must reside or work within the CoC's geographical area.
- 2. The Chair and voting members of the CoC Committee shall be appointed by the HOTHC Board of Directors in collaboration with the CoC Collaborative Applicant and HMIS Lead.
- 3. The Chair of the CoC Committee, the Continuum of Care Lead, and the HMIS Lead shall be included among the non-voting members of the CoC Committee.
- 4. Each HUD CoC grant recipient may nominate 1 voting member and one alternate voting representative to this committee.
- 5. Must attend a minimum of 75% of the regular coalition meetings (General Membership) in a calendar year.
- 6. Must be current with membership fees each year.
- 7. The voting members shall be individuals who have no potential conflict of interest related to policy and financing decisions related to the CoC.
- 8. Must disclose potential conflicts of interest and sign a conflict of interest statement annually AND must recuse from voting on any matter that is a conflict of interest.

The CoC Committee shall execute the following duties:

- 1. The Committee is responsible for the review, providing guidance as needed, and approval of the following areas of recommendations for action:
 - a) The prioritization of funding needs and strategies to finance housing and services for people experiencing homelessness.
 - b) The emphasis or direction of service delivery approaches for the CoC.
 - c) The identification and prioritization of service needs or gaps in service.
 - d) Responsibilities and duties of convening the HUD Continuum of Care.
 - e) Monitoring CoC recipient and sub-recipient performance, evaluation of program outcomes, and recommendation of corrective action, as needed.
- 2. Develop policies and procedures conforming to the U.S. Department of Housing and Urban Development (HUD) requirements detailed in 24 CFR part 578.1 to:
 - Review and approve for execution the Memorandum of Understanding (MOU) for The City
 of Waco as the CoC Lead Agency to serve as the Collaborative Applicant to operate the
 Continuum of Care if The City of Waco is designated by the CoC Committee;
 - b. Review and approve for execution the Memorandum of Understanding (MOU) for The City of Waco as the CoC Administrator of the Homeless Management Information System if The City of Waco is designated by the CoC Committee; and
 - c. Conduct year-round Continuum of Care planning of homelessness and homeless prevention housing and services.

- 3. Planning oversight includes:
 - a. program development
 - b. implementation design
 - c. financing strategies
- 4. Review the responsibilities of the standing committees, or other committees, subcommittees, and workgroups/taskforces annually.
- 5. The Scoring/Ranking Committee, a standing sub-committee, reports to the CoC Committee of the Board with duties that include, but are not limited to, the following:
 - a. Reviews each renewing grants program and/or new project proposals, hears presentations by grant applicants and may conduct site visits with each agency.
 - b. Recommends the methodology of prioritizing the grant programs for the CoC Program NOFA Application to the CoC Committee of the Board for approval.
 - c. Determines the CoC Program NOFA Application priority rankings based on the approved prioritization methodology.
- 6. Continuously review CoC program performance through HMIS reporting.
- 7. Receive quarterly reports from all standing committees, workgroups/taskforces and HMIS program.
- 8. Maintain and update the CoC Policies and Procedures Manual needed to comply with requirements associated with establishing and operating a CoC and HMIS requirements prescribed by HUD.

Section Three: Continuum of Care Structure and Delegation (24 CFR part 578.7(a))

Policy:

The TX-604 Waco/McLennan County CoC will establish and follow protocols for full CoC Assembly meetings, including:

- 4. Meet at least six times annually
- 5. Publish the agenda prior to the meeting
- 6. Establish minimum standards for inviting new members to join
- 7. At least annually, invite new members to join
- 8. Provide a public means of extending the invitation within the CoC's geographic area
- 9. Establish committees, subcommittees, or workgroups/taskforces to fulfill the CoC's responsibilities
- 10. Document and adhere to a process of appointing members to committees, subcommittees, or workgroups/taskforces

Procedures:

Minimum Membership Standards

1. Membership in the CoC is open to agencies, organizations and individuals that provide or facilitate homeless services or advocate for services for those experiencing homelessness. Each agency or organization that is a recipient of HUD Continuum of Care funding will have only one voting

- representative and one alternate voting representative at any given time. These individuals will also serve as the official contact persons for the agency or organization that she/he represents.
- Member agencies or organizations will notify HOTHC, in writing, of the voting representative and alternate. Their telephone numbers and email addresses must be provided for communications. Additional agency or organization personnel email addresses can be provided to receive communications.
- 3. Prospective members may attend any CoC meeting as a non-voting member before joining.
- 4. Membership fees shall be paid in January of each. New members will pay the full amount of annual dues.

Agenda Publication:

- 7. CoC Committee agendas will be emailed to the HOTHC listserv one week prior to the meetings.
- 8. CoC Assembly agendas will be posted on the Heart of Texas Homeless Coalition (HOTHC) website at www.heartoftexashomeless.org one week prior to the meetings.
- 9. Each member of the CoC is responsible for helping to recruit new members.
- 10. All members will contact representatives of relevant organizations to solicit their membership in the CoC.
- 11. All CoC members who provide homeless services will identify and contact consumers who are or were homeless to invite their participation in the CoC.
- 12. An invitation for membership will be sent from the HOTHC listserv annually.
- 13. At least annually, the HOTHC social media sites will include an invitation to join the CoC.

Establishing Committees, Sub-committees and Workgroups/Taskforces:

- 1. All standing committees, sub-committees and workgroup/taskforce chairs are appointed by the CoC Committee Chair.
- 2. Committees, sub-committees and workgroups/taskforces will be established as needed to fulfill the CoC Strategic Plan.

Section Four: Continuum of Care Governance Charter (24 CFR part 578.7(a))

Policy:

In accordance with the 2009 HEARTH Act the TX-604 Waco/McLennan County CoC has established a governance structure to act on its behalf. Governance is provided by the Heart of Texas Homeless Coalition (HOTHC) as the current Collaborative Applicant.

The TX-604 Waco/McLennan County CoC's governance charter will:

- Be reviewed annually and updated as needed by the CoC Committee of the Board in consultation with the HMIS Administrator and Collaborative Applicant; changes must be approved by the HOTHC board of directors and ratified by the CoC Committee.
- 2. Define the CoC's governance structure, including designating the HMIS lead and Collaborative Applicant and the responsibilities for each;
- 3. Define the responsibilities of committees, subcommittees, or workgroups/taskforces;

- 4. Specify policies and procedures needed to comply with requirements associated with establishing and operating a CoC and HMIS requirements prescribed by the U.S. Department of Housing and Urban Development (HUD);
- 5. Define the code of conduct and recusal process for committee, its chair(s), and any person acting on behalf of the CoC Committee of the Board.

Procedures:

Heart of Texas Homeless Coalition (HOTHC) By-laws and the CoC Policies and Procedures will be reviewed annually. The HOTHC Board will facilitate a committee of four (4) persons appointed by the HOTHC Board of Directors Chair to review the By-laws and CoC Policies and Procedures. At least two members must be appointed from the CoC Committee.

The CoC Assembly shall select a lead agency to provide staff to the various committees and work groups that constitute the CoC. The lead agency will perform a variety of necessary functions such as performance monitoring, engagement and education of stakeholders and submission of the annual collaborative CoC grant application. The CoC Committee will maintain an MOU agreement with the lead agency that is reviewed annually and updated periodically. The lead agency will be eligible to apply for CoC planning funds through the CoC grant process when available. These funds may be used to provide dedicated staff and resources to the support of the CoC as specified by HUD guidelines.

At this time, the City of Waco has been designated as the lead agency.

The CoC Committee will select an administrator for the Homeless Management Information System (HMIS) for the CoC. The CoC Committee will maintain an HMIS Governance Agreement with the HMIS Administrator. This agreement is reviewed annually and updated periodically. The administrator is eligible to apply for HMIS funds through the CoC grant process and other sources and will use these funds to dedicate staff and resources to the functions of the HMIS as specified by HUD guidelines.

At this time, the City of Waco has been designated as the HMIS administrator for the CoC.

The HOTHC By-laws and CoC Policy Procedures committee will make recommendations to the HOTHC Board at a regular meeting. Revisions and/or additions can be made by a simple majority (at least 51%) of affirmative votes. Proposed amendments must be in written form and distributed to the members of the HOTHC Board of Directors prior to the presentation and vote.

The responsibilities of the CoC Committee are as follows:

- 1. Develop policies and procedures conforming to the U.S. Department of Housing and Urban Development (HUD) requirements detailed in 24 CFR part 578.1 to:
 - Review and approve the execution of the Memorandum of Understanding (MOU) if the City of Waco is designated the CoC Administrator of the Homeless Management Information System; and
 - b. Conduct year-round Continuum of Care planning of homeless and homeless prevention housing and services.
- 2. Development and approval of annual actions plans for the CoC Strategic Plan. Planning oversight includes:

- a. Program development
- b. Implementation design
- c. Financing strategies
- 3. Review the CoC Strategic Plan annually and adjust as needed
- 4. Continuous review of CoC program performance through HMIS reporting
- 5. Receive bi-monthly reports from all standing committees, workgroups/taskforces and HMIS program.
- 6. Submit and present quarterly reports to the HOTHC Board of Directors.

All CoC Standing Committees will have an agreed-to charter and documented work plan. Standing Committees include the following:

- 1. Scoring/Ranking Committee
 - a. Reviews each renewing grants program and/or new project proposals, hears presentations by applicants and conducts site visits with each agency.
 - b. Recommends the methodology of prioritizing the grant programs for the CoC Program NOFA Application to the CoC Committee of the Board for approval.
 - Recommends the CoC Program NOFA Application priority rankings based on the determined prioritization methodology for approval of the CoC Committee of the Board.

Section Five: Continuum of Care Performance and Monitoring (24 CFR part 578.7(a))

Policy:

The TX-604 Waco/McLennan County CoC will:

- 1. Establish performance targets for each population and program type
- 2. Consult with CoC member agencies to establish:
 - Means of monitoring performance of CoC recipients and sub-recipients
 - b. Means of evaluating outcomes of both CoC and ESG recipients
 - c. Means of taking action against poor performers in an on-going fashion

Procedures:

Performance targets will include priorities of the U.S. Department of Housing and Urban Development (HUD) and community priorities and needs determined by CoC Standing Committees and the CoC Assembly and will include, but not be limited to, the following:

- 1. Increase the number of permanent housing beds dedicated for the chronically homeless.
- 2. Increase the percentage of homeless persons staying in permanent housing upon program exit to more than six (6) months.
- 3. Increase the percentage of homeless persons moving from transitional housing to permanent housing.
- 4. Increase percentage of homeless persons in employed at exit.
- 5. Increase percentage of homeless persons receiving other income sources.

- 6. Increase the percentage of participants in all CoC-funded projects that obtained mainstream benefits at program exit.
- 7. Decrease the number of homeless households with children.
- 8. Provide ongoing case management with 70% of client service goals accomplished for each client.
- 9. Ensure timely, accurate, and complete data entry into HMIS by the provider to produce Annual Progress Report (APR) and contribute data to the Annual Homeless Assessment Report (AHAR) and annual Point In Time (PIT) reports if the agency is not prevented, by law, from entering data (i.e. Violence Against Women's Act).

Performance will be monitored by the HMIS administrator, Collaborative Applicant, and the Independent Evaluation Committee.

Monitoring will include, but will not be limited to, the following:

- 1. HMIS Administrator will generate Report Cards monthly that include measurement of HMIS usage and CoC program performance criteria. Report cards will be sent to Agency Administrator and CoC Lead.
- 2. Grantees with failing HMIS grades must attend refresher training.
- 3. Grantees with failing or consistently low performance grades must meet with the HMIS Administrator and Collaborative Applicant to discuss ways to improve performance.
- 4. Grantees with consistently failing grades will be required to document an improvement plan.
- Grantees unable to improve HMIS usage and performance may have funds reallocated based upon a recommendation from the Independent Evaluation Committee and approval by the CoC Committee.

Section Six: Continuum of Care Coordinated Assessment (24 CFR part 578.7(a))

Policy:

In consultation with recipients of Emergency Solutions Grants (ESG) program funds within the geographic area, the Continuum of Care (CoC) will establish and operate a coordinated assessment system that will provide initial, comprehensive assessment of needs and can be easily accessed.

The CoC's specific coordinated assessment system will document the plan for addressing the needs of individual or families who are fleeing domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers.

The system will document a plan to coordinate the implementation of a housing and service system within the CoC's geographic area to meet the needs of homeless individuals (including unaccompanied youth) and families.

The system will encompass outreach, engagement and assessment; encompass shelter, housing and supportive services, and prevention strategies.

Procedures:

Core system concepts include, but are not limited to, the following mechanisms and procedures:

- 1. A uniform needs assessment tool.
- 2. Inclusion of an objective instrument to assess risk/prioritization of referrals.
- 3. A policy that will guide all grantees towards prioritization of referrals to ensure program entry is based on need and other prioritization factors.
- 4. Establishment of well advertised entry points in which clients experiencing a housing crisis may obtain services.
- 5. The customization of the HMIS data base to include effective assessment tools, eligibility information, and collection of needs, referrals, and services provided by Coordinated Access system.
- 6. Orientation and training for grantees and other staff in using the new tools.
- 7. Increased resources in responding to all help seekers with assessments.
- 8. The "Piloting" of any new technology and practice prior to full roll out.
- 9. Training for assessment staff.

Section Seven: Written Standards Around CoC Assistance (24 CFR part 578.7(a))

Policy:

In consultation with recipients of Emergency Solutions Grants (ESG) program funds within the geographic area, the Continuum of Care (CoC) has established and consistently follows written standards for providing CoC assistance. At a minimum, these written standards must include:

- 1. Policies and procedures for evaluating overall eligibility for CoC assistance and eligibility
- 2. Policies and procedures for evaluating eligibility for Transitional Housing assistance and for prioritizing which eligible individuals or families will receive TH
- Policies and procedures for evaluating eligibility for Rapid Re-Housing (RRH) assistance and for prioritizing which eligible individuals or families will receive RRH
- 4. Policies and procedures for determining and prioritizing which eligible individuals or families will receive Permanent Supportive Housing assistance
- 5. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid re-housing assistance

Procedures:

The CoC's written standards will:

- 1. Be specific and detailed.
- 2. Address any unique eligibility requirements for assistance (e.g., disability or subpopulation).
- 3. Reflect the homeless population and subpopulations within the CoC.
- 4. Reflect the housing and service resources available within the coC.
- 5. Reflect local and national targeting priorities.

To adapt written standards, the CoC Committee will review written standards on an annual basis, considering:

1. Provider feedback on the current written standards.

- 2. Program participant feedback on the intake process.
- 3. The effectiveness and appropriateness of housing and services for current program participants.
- 4. The CoC's success at meeting the performance standards in Section 427 of the McKinney-Vento Act.
- 5. Changes in the characteristics of the homeless population within the CoC.
- 6. Changes in the housing and service resources available within the CoC.

Overall Eligibility:

Case managers will use the Coordinated Access assessment tool and the Homeless Management Information System (HMIS) to conduct an initial evaluation to determine each individual or family's eligibility for assistance and the amount and types of assistance the individual or family may need to regain stability in permanent housing.

Determining Housing Eligibility:

- 1. For homeless families with children, a coordinated assessment tool will be used that will seek to mediate and/or prevent homelessness whenever possible, reduce the homeless episode for families through rapid re-housing (RRH) and shelter and/or transitional housing focused on moving families from homelessness to permanent housing as soon as possible, and permanently house the most vulnerable families, as resources are available. The uniform assessment tool will gather information to determine the appropriate intervention and assist in prioritizing families for more intensive services.
- 2. For individuals unaccompanied by children, a coordinated assessment tool will be used that will seek to mediate and/or prevent homelessness whenever possible, reduce the homeless episodes for the individual through rapid re-housing (RRH) and shelter/transitional housing focused on moving individuals from homelessness to permanent housing as soon as possible as resources are available. The uniform assessment tool will gather information to determine the appropriate intervention and assist in prioritizing individuals for more intensive services. If individuals are assessed and found not to be vulnerable and chronically homeless, they will be targeted for: transitional housing, permanent supportive housing, rapid re-housing, or income-based housing. Non-chronically homeless individuals who identify a substance abuse and/or mental health disorder and interest in receiving services for these concerns will be referred to the appropriate residential treatment programs.
- 3. For unaccompanied children, a coordinated assessment tool will be used that will seek to mediate and/or prevent homelessness whenever possible, reduce the homeless episodes through shelter and/or transitional housing focused on their needs. The uniform assessment tool will gather information to determine the appropriate intervention and assist in prioritizing the child for more intensive services.
- 4. For persons fleeing domestic violence, a coordinated assessment tool will be used to identify resources and provide referrals to appropriate services providers in order to prevent or limit lengths of homelessness. Victims of domestic violence that are in immediate danger or are seeking emergency shelter will be provided with the contact information and be encouraged to contact the Family Abuse Center hotline.

Order of Priority in Permanent Supportive Housing Projects Dedicated to Persons Experiencing Chronic Homelessness:

Please refer to Section III of HUD's Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Record Keeping Requirements for Documenting Chronic Homeless Status for detailed information about each prioritized population for Permanent Support Housing.

- 1. First Priority-chronically homeless individuals and families with the longest history or homelessness and with the most severe service needs
- 2. Second Priority- chronically homeless individuals and families with the longest history of homelessness
- 3. Third Priority-chronically homeless individuals and families with the most severe service needs
- 4. Fourth Priority- all other chronically homeless individuals and families

Order of Priority in Permanent Supportive Housing Projects NOT Dedicated to Persons Experiencing Chronic Homelessness:

- 1. First Priority- homeless individuals and families with a disability with the most severe service needs
- 2. Second Priority- homeless individuals and families with a disability with long period of continuous or episodic homelessness
- 3. Third Priority- homeless individuals and families with disability coming from places not meant for human habitation, safe havens, or emergency shelters
- 4. Fourth Priority- homeless individuals and families with a disability coming from transitional housing

Order of Priority in Transitional Housing Projects:

- 1. Individuals and families with heavy service needs to stabilize in housing.
- 2. Specific subpopulations of homeless individuals and families, including: Victims of domestic violence, dating violence, sexual assault, or stalking
- 3. Transition-aged youth (18-24)
- 4. Persons with a substance abuse disorder
- 5. Wrap around services will be designed to address the specific service needs of each subpopulation.

Order of Priority in Rapid Re-Housing Projects:

- 1. Individuals and families with higher barriers to housing, and higher service needs who are waiting to obtain another permanent housing subsidy (e.g., PSH).
- 2. Individuals or families with lower barriers to housing and less service need who are expected to stabilize in permanent housing with no additional assistance.

Standards for Determining Portion of Rent Paid by Participants:

1. Participants in rapid re-housing programs may be asked to pay up to 30% of their monthly adjusted income towards their rent.

- 2. Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the current Fair Market Rent limit, established by HUD.
- 3. The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.
- 4. The rental unit must meet minimum habitability standards.
- 5. There must be a rental assistance agreement and lease between the property manager and tenant as well as the owner of property and ESG sub-recipient.
- 6. No rental assistance may be made to an individual or family that is receiving rental assistance from another public source for the same time period.

Section Eight: Designate and Operate HMIS (24 CFR part 578.7(a))

Policy:

The TX-604 Waco/McLennan County CoC will:

- 1. Designate a single HMIS for the geographic area;
- 2. Designate a single eligible applicant as HMIS lead;
- 3. Review, revise, and approve privacy, security and data quality plans for HMIS;
- 4. Ensure HMIS administration is in compliance with U.S. Department of Housing and Urban Development (HUD) requirements;
- 5. Ensure consistent participation of program providers.

Procedures:

At this time, The City of Waco has been designated as the HMIS administrator for the CoC.

The CoC Committee will select an administrator for the Homeless Management Information System (HMIS) for the CoC. The CoC Committee will maintain an HMIS Governance Agreement with the HMIS Administrator. This agreement is reviewed annually and updated periodically. The administrator is eligible to apply for HMIS funds through the CoC grant process and other sources and will use these funds to dedicate staff and resources to the functions of the HMIS as specified by HUD guidelines.

The HMIS Advisory Committee a standing committee of the Heart of Texas Homeless Coalition advises and supports the Heart of Texas HMIS's operations in the following programmatic areas: quality assurance & accountability, resource development and consumer involvement. The committee meets quarterly.

- 1. Responsibilities of the HMIS Advisory Committee include but are not limited to:
 - a. Brainstorming the best uses for HMIS
 - b. Identifying and prioritizing system enhancements
 - c. Development and revision of HMIS policies and procedures
 - d. Establishing mechanisms for monitoring and/or enforcing compliance with policies and procedures

- e. User group chair/co-chairs may assist in the process of imposing sanctions on users/agencies for misuse of system
- 2. The Committee is fundamentally an advisory committee to the project.

Please refer to the Heart of Texas HMIS Policies and Standard Operating Procedures (PSOP) regarding privacy, security and data quality plans for HMIS.

The HMIS Administrator is responsible for the following:

- 1. Execute HMIS participation agreements
- 2. Monitor compliance with applicable HMIS standards on a regular basis including annual on-site monitoring with HMIS users.
- Maintain and update as needed the files for HMIS software to include software agreements, HUD Technical Submissions, HUD executed agreements and Annual Progress Reports
- 4. Develop and maintain HMIS agency files to include signed participation agreements, user license agreements and all other signed agreements pertaining to HMIS
- 5. In conjunction with the HMIS Advisory Committee, review and update HMIS Policy and Standard Operating Procedures Manual (PSOP) annually. The PSOP manual should include: HMIS data quality plan, privacy policy, and security plan.
- 6. Provide new user training and quarterly refresher trainings.
- 7. Provide on-site technical support to agencies using HMIS for trouble-shooting and data input
- 8. Monthly review of HMIS data and bed lists to ensure that participating agency programs are using HMIS accurately
- 9. Provide assistance to agencies upon request for additional on-site training and support
- 10. Lead planning efforts for the annual Point In Time Count
- 11. Complete ,in conjunction with CoC Lead and CoC Committee, Annual Homelessness Assessment (AHAR), Point In Time (PIT), Housing Inventory (HIC), and Annual Performance Report (APR)

Section Nine: Continuum of Care Plan (24 CFR part 578.7(b))

Policy:

The TX-604 Waco/McLennan County CoC will develop and maintain a plan that includes:

- 1. Coordinating the implementation of a housing and services system, to include:
 - a. Outreach, engagement, and assessment
 - b. Shelter, housing, and supportive services
 - c. Prevention strategies
- 2. An annual Housing Inventory Chart (HIC) and a point-in-time (PIT) count for homeless persons who are unsheltered and sheltered, including emergency shelters, transitional housing, permanent supportive housing and rapid re-housing.
- 3. An annual gaps analysis.
- 4. Collaborating with agencies responsible for developing Consolidated Plans.
- 5. Consulting with Emergency Solutions Grant (ESG) recipients about the allocation of ESG funding, evaluation of ESG grants and reporting on the performance of ESG recipients, sub-recipients and sub-sub recipients.

Procedures:

The CoC provides continuous planning and coordination of services through the CoC Committee and the CoC Standing Committees whose core functions include ensuring that individuals and families experiencing homelessness have appropriate choices in the following area:

- 1. Unsheltered outreach
- 2. Emergency shelter
- 3. Transitional housing
- 4. Rapid re-housing
- 5. Permanent Supportive Housing
- 6. Safe Havens
- 7. Addressing the needs of subpopulations including, but not limited to, unaccompanied youth, persons with disabilities, and those fleeing domestic violence

The CoC Strategic Plan incorporates the strategies in the *Mayor's 10 Year Plan to End Chronic Homelessness* developed in 2005. Each year the CoC and HMIS Lead agency sends the Point In Time, Housing Inventory County, gaps analysis and unmet need data to assist with the development of the Consolidated Plan.

The CoC's Strategic Plan will be reviewed and updated as appropriate by the CoC Committee on an annual basis.

The CoC Lead will facilitate meetings with ESG recipients to recommend housing and service priorities, identified by the CoC, for funding allocation. The CoC Lead reviews ESG recipients' performance reports from the ESG sub-recipients to assess compliance with the CoC's priorities and progress toward the projects' stated goals.

Section Ten: Continuum of Care Annual Application

Policy:

The TX-604 Waco/McLennan County CoC will document processes for the following:

- 1. Setting funding priorities
- 2. Facilitating a collaborative process for the development of applications
- 3. Approving the annual submission of applications

Procedures:

The CoC will use an independent evaluation committee (Scoring/Ranking Committee), a CoC Standing Committee, and the CoC Lead Agency (City of Waco) staff to execute the annual CoC Program application:

1. The CoC Scoring/Ranking Committee consisting of up to 7 volunteer members, who have no direct relationship with the renewing grantees or any new proposed projects, will perform an annual review of each renewing or newly proposed program grant, hear presentations by potential grant applicants regarding programs and/or conduct site visits at each agency.

- a. Program performance is based on assessment completed by the Scoring/Ranking committee and Collaborative Applicant staff. Scoring criteria are based on program performance measurements required by HUD and local community priorities.
- b. Financial performance is based on a review of audited financials for the nonprofits and bond ratings of the governmental entities.
- c. The Scoring/Ranking committee develops the methodology for use in prioritizing the grant programs and notifies the CoC Committee.
- d. The Scoring/Ranking committee develops the grant priority ranking for the annual CoC Program grant and notifies the CoC Committee.
- e. Scoring/Ranking and Reallocation Tools and Policies are reviewed and approved by the Scoring Ranking Committee annually.
- f. The committee operates year round.
- 2. The Collaborative Applicant handles the process for developing newly proposed project applications as well as the process for renewing grants.
 - a. For a new project application the process is as follows:
 - i. Communicate verbally to CoC Committee an interest in applying for funding.
 - ii. Complete the Request for Application (RFA) and submit by the due date.
 - iii. Meets/presents to the CoC Committee.
 - iv. If project is selected by the Scoring/Ranking Committee, participation in all mandatory meetings related to application process is required.
 - v. All deadlines determined by CoC Lead for submission of the Project Application in e-snaps must be met.
 - vi. Agree to full participation in the HMIS system for all clients and timely payment of HMIS fees related to HMIS use, if applicable.
 - b. Renewal Project Application Submission
 - i. Participation in all mandatory meetings related to the NOFA application process is required.
 - ii. Submit all requested organizational documents.
 - iii. Provides presentation to and may host site visits for the CoC Committee as requested by the reviewers.
 - iv. All deadlines determined by CoC Lead for submission of the Project Application must be met.
 - c. CoC funding priorities in priority order are:
 - i. HMIS grant
 - ii. Permanent Supportive Housing (PSH) grants
 - iii. Rapid Re-Housing (RRH) grants
 - iv. Reallocations to permanent housing (e.g., PSH or RRH) grants

v. Transitional Housing grants

d. Project Ranking and Reallocation Policy

On an annual basis, the Heart of Texas Continuum of Care is required to rank all new and renewal projects submitted to HUD for funding in an order that reflects the CoC's needs and priorities. Additionally, HUD requires CoCs to review the performance of all funded projects and seek to reallocate funding away from low performing projects or those providing services that are of a lower priority in preventing and ending homelessness.

The Heart of Texas CoC is seeking to accomplish the following in the ranking and reallocation of projects:

- Incentivize all providers to focus on outcomes and to seek to achieve the performance targets specified by the CoC.
- Encourage providers to adopt evidence based practices including Housing First to more effectively employ CoC resources.
- Replace projects that are not high performing or following evidence based practices with new projects that follow CoC and HUD priorities.

Procedures:

All new and renewal projects will be ranked by the CoC. The primary factor controlling the ranking of projects will be the scores assigned to renewal and new projects. Scoring is based on project performance, grant management, community outcomes, and adherence to policy priorities. Except as specified below, projects will be ranked in the NOFA competition by the scores assigned to renewal or new projects.

There are two categories of projects that will not be ranked according to performance scores:

- Projects that are essential to the operation of the CoC. This includes funding for HMIS and Coordinated Entry. These are unique projects focused on CoC operations and that cannot be readily evaluated or compared to other CoC funded projects. Failure to renew this funding would have negative consequences for the CoC and jeopardize future funding opportunities.
- First time renewal of newly funded grants. HUD requires newly funded one-year project grants to be renewed in the competition. In most instances, these projects will have not yet started operations. In other instances, the projects have just started but are far from being able to report on a full year of operations in the APR.

The two project types identified above will not be assigned scores. These projects will be ranked by the CoC to assure – to the maximum extent possible – that they will be funded in the competition. Subject to review based on the actual NOFA, these projects will be ranked at the bottom of Tier 1, with all of their funding above the Tier 1/Tier 2 demarcation. All other CoC projects will be ranked according to scores:

• Renewal projects will be ranked according to adjusted renewal project score. Renewal scores will be adjusted as follows: if the highest scoring renewal project scores less than 200

points, then all renewal scores will be adjusted upward by the difference between the highest scoring renewal project and 200. Renewal projects that qualify for renewal based on the renewal performance evaluation will be ranked above new projects.

New projects will be ranked according to scores.

Current CoC grantees may elect to reallocate some or all of the funding associated with their project. These reallocated projects will be scored as new projects and ranked according to score the same as all new and renewal projects. CoC grantees in good standing (no outstanding HUD or CoC monitoring findings and no open audit findings) may voluntarily reallocate their funding and will not have to compete with other organizations for that funding.

The minimum score for automatic renewal of CoC funded projects is 65% of the highest scoring project.

If the highest scoring project receives a score of 200, then all projects scoring below 130 will be reallocated unless a Project Improvement Plan has been submitted and approved by the CoC board. Should the highest scoring project receive a score of 190, then the minimum acceptable score would be 123.5.

The Project Improvement Plan must specify how the project will improve performance and meet standards in the upcoming year. If the CoC board accepts the Project Improvement Plan, the grantee will be allowed to apply for renewal funding.

Any legal applicant for CoC funds can apply for new projects from the bonus pool or the uncommitted reallocation pool. The CoC will only rank new projects for which there is sufficient funding in the new or reallocation pool to fully fund the project.

Policy on Expenditure of Grant Funds:

Funds unexpended at the completion of the grant term are recaptured by HUD. In some instances these funds are then allocated to other CoCs or in other cases are returned to the federal treasury. The Heart of Texas CoC seeks to minimize this recapture of funding and to the maximum extent possible ensure that homeless assistance funding allocated to the City of Waco is used to support homeless people in the city.

Underexpenditure Policy:

It is the policy of the Heart of Texas CoC that CoC funds granted to an applicant agency will either be fully expended to assist eligible homeless people or the CoC will recapture the unspent funding and add it to the pool of resources available for reallocation. Heart of Texas CoC grantees that expended less than 90% of their funding in the most recent grant year will face recapture of unexpended funding that exceeds 10% of the grant funds. If, for example, the CoC grant was for \$100,000 and \$85,000 was expended, the grantee would see \$5,000 in funding recaptured. Recapture of unexpended funding that exceeds 10% of the total grant will be automatic. The Scoring/Ranking Committee may consider extenuating circumstances regarding projected expended funds. For example, an agency had staff

vacancies at the beginning of the grant cycle and all vacancies have been filled later in the grant cycle altering the capability of the program to serve greater number of clientele which would increase projected expenditures. The applicant must put any considerations based on circumstance in writing to the Scoring/Ranking Committee.

Grantees may also prevent this automatic recapture by submitting an appeal to the Board of the CoC. The appeal will need to: explain the reason for the under-expenditure and provide a plan for fully expended the grant in the current cycle. The Board may approve the request at its discretion. However, if the funds are restored and under-expended in the subsequent grant cycle funding will be recaptured as indicated above. All CoC board decisions can be appealed but a second appeal would require extraordinary circumstances to be approved.

e. CoC Lead is responsible for the review of the recommendations from the CoC Scoring/Ranking Committee related to the annual submission of the CoC Program Application and the Grant Priority Ranking. This review is to ensure CoC policies and HUD requirements are met.

Section Eleven: Continuum of Care Planning

Policy:

The TX-604 Waco/McLennan County CoC will document the following planning procedures:

- 1. Determining the geographic area of the CoC
- 2. Development and facilitation of a community-wide CoC planning process
- 3. Developing a CoC housing and service system
- 4. Evaluation of outcomes for CoC programs and ESG programs
- 5. Monitoring grant recipients and sub-recipients
- 6. Providing training and technical assistance
- 7. Preparing and submitting an application to the U.S. Department of Housing and Urban Development (HUD)
- 8. Conducting a sheltered and unsheltered Point-in-Time (PIT) Count
- 9. Collecting of housing data to prepare the Housing Inventory Count (HIC) report

Procedures:

Establish Continuum of Care Geographic Area:

TX-604 Waco/McLennan County Continuum of Care (CoC) shall serve the geographic area of McLennan County, Falls County, Bosque County, Hill County, Limestone County, and Freestone County, Texas as recognized by the U.S. Department of Housing and Urban Development (HUD).

Community-wide CoC Planning Process & Continuum of Care System:

TX-604 Waco/McLennan County CoC promotes comprehensive and coordinated approaches to housing and community resources for individuals and families who are homeless or at risk of homelessness through, but not limited to, the following:

- 1. Prevention
- 2. Outreach services
- 3. Emergency shelters and supportive services
- 4. Transitional housing and supportive services
- 5. Permanent supportive housing
- 6. Rapid Re-housing
- 7. Enrollment in mainstream resources
- 8. Skills training
- 9. Employment counseling
- 10. Discharge planning

The CoC is comprised of several volunteer committees and workgroups/taskforces which have various CoC planning roles and responsibilities. These committees include, but are not limited to, the following:

1. CoC Committee

- a. CoC Committee is comprised of providers of housing and services to the homeless and advocates who give input and help shape CoC planning.
- b. Voting members of the CoC Committee elect the Chair who serves two-year terms.
- c. The CoC Committee convenes at least six times annually and may convene for special meetings when needed.
- d. CoC Committee members also serve on standing committees, sub-committees, and workgroups/taskforces
- e. Responsibilities of this committee are outlined in Section 2

2. Project Homeless Connect/PIT Committee:

This committee is responsible for planning and fundraising related to the annual Project Homeless Connect Event which connects homeless individuals/families with community resources. The event is held the last Thursday of January in conjunction with the annual Point In Time Count (PIT). This committee in collaboration with the HIMS Lead also oversees the planning of the annual Point In Time Count (PIT).

3. HMIS Advisory Committee:

The Advisory Committee advises and supports the Heart of Texas HMIS's operations in the following programmatic areas: quality assurance & accountability, resource development and consumer involvement. The committee meets monthly for the first three months at which time HMIS issues can be raised for discussion and/or approval. The Committee will meet quarterly thereafter.

The responsibilities of this committee include but are not limited to:

- a. Brainstorming the best uses for HMIS
- b. Identifying and prioritizing system enhancements

- c. Establishing mechanisms for monitoring and/or enforcing compliance with PSOP
- d. User group chair/co-chairs may assist in the process of imposing sanctions on users/agencies for misuse of system
- e. This committee is fundamentally an advisory committee to the project.

Section Twelve: Emergency Solutions Grant (ESG) Administration

Policy:

The TX-604 Waco/McLennan County CoC will maintain written policies and procedures that document:

- 1. Budgeting the costs to the Collaborative Applicant of administering ESG funds from TDHCA
- 2. Allocating ESG funds, including ESG funds for administrative costs and for HMIS
- 3. Selecting ESG sub-sub recipients (TDHCA is the ESG recipient, the Collaborative Applicants are the sub recipients, and entities under the Collaborative Applicant are sub-sub recipients)
- 4. Training and monitoring sub-sub recipients
- 5. Collecting performance and expenditure data from sub-sub recipients and aggregating it to reflect all State ESG programs within the CoC
- 6. Reporting performance and expenditure data to TDHCA
- 7. Receiving reimbursements from TDHCA and disbursing reimbursements to sub-sub recipients

Procedures:

Collaborative Applicant Costs:

The CoC's Collaborative Applicant will administer the Emergency Solutions Grant (ESG) funds that the CoC receives from the Texas Department of Housing and Community Affairs (TDHCA). In consultation with the CoC Committee, the Collaborative Applicant will develop a budget that itemizes and details grant administration costs. The Board of Directors of the Collaborative Applicant will approve the final budget.

Allocation of Emergency Solutions Grant (ESG) Funds:

Priority is given to programs that:

- 1. Benefit chronically homeless persons, meet the needs of local communities, are cost-effective, have participation by the public and private sector, are part of the Continuum of Care process and address problems of health, safety, and welfare.
- Move persons experiencing homelessness from shelters and off the streets into decent, safe, and affordable housing and provide supportive services to promote housing retention and improve or maintain quality of life.

Funding allocation will include costs associated with HMIS implementation.

Selection of ESG Sub-Sub Recipients:

1. Applicants must actively participate in communitywide planning efforts to ensure the strategic use of resources by all providers of homeless services.

- 2. Prior to submitting an application, applicants must discuss their proposed ESG projects with their CoC and must submit with their application completed "Certificate of HMIS Usage", "Certificate of Participation", and "Certification of CoC Coordination" documents.
- 3. Applicants shall ensure the following housing services for individuals/families are available:
 - a. For those homeless individuals and families in need of housing, appropriate housing that meets the needs of the homeless individual or family (e.g., rapid re-housing, permanent housing, permanent supportive housing, or single-room occupancy), combined with supportive services, shall be provided to maintain residential and personal stability (e.g., subsidized rent, case management services, nursing care, mental health care management, substance abuse treatment).
 - b. For those homeless individuals or families placed in rapid re-housing, permanent housing or permanent supportive housing, ESG recipients/sub-recipients shall assist the client in locating suitable, affordable housing, assist with housing applications and lease negotiation, application fees, first and last month's rent, short-term rental subsidies, furniture stipends, utility deposits, back payments, emergency payments, start-up household supplies and furnishings, start-up food and grocery supplies, transportation assistance, and clothing, when necessary or applicable.
 - c. For homeless individuals or families placed in emergency shelters, rapid re-housing, permanent housing, permanent supportive housing, single-room occupancy, or affordable housing, ESG recipients/sub-recipients will ensure housing is safe and decent, meeting housing quality standards established by the Federal regulations.
- 4. Recipients/sub-recipients shall provide quality supportive services that meet accepted standards of care. At minimum, recipients/sub-recipients must provide or have access to the following supportive services:
 - a. Participate in a coordinated outreach and intake system that serves homeless individuals and families designated by the CoC;
 - b. Perform a comprehensive, coordinated assessment of current psycho-social, health (including mental health and substance use/abuse), and employment/education conditions;
 - c. Perform an individualized service/treatment plan developed for all clients describing a client's needs for supportive services and, if necessary, establishing a service/referral plan;
- 5. Provide minimum supportive services that will include, but not be limited to:
 - a. Comprehensive assessment upon enrolling into the ESG Program
 - Case management of individuals and family members enrolled in an ESG program that includes home visits to ensure housing stability and address the needs of their clients and provide the level of service expected of ESG funded case management,
 - c. Assistance for enrolling in benefit programs,
 - d. Medical and mental health treatment,
 - e. Substance abuse treatment,
 - f. Education/vocational training,
 - g. Job counseling/training/job placement,
 - h. Child care, and
 - i. Transportation necessary to maintain permanent housing;

6. All sub-recipients are expected to provide appropriate level of supportive services to clients for the full time necessary to stabilize that client and provide for the likelihood of positive housing outcomes after assistance. A client is eligible to receive assistance up to the full 24 months in a three (3) year period as determined by the certification process required for all ESG clients.

Program Training and Monitoring:

The proposed outcomes below are developed from HMIS data elements and will be used as the basis for monthly performance reporting. At minimum, applicants will be evaluated based on their performance against these outcomes.

Collecting performance and expenditure data from sub-sub recipients and aggregating it to reflect all State ESG programs within the CoC will include, but not be limited to:

1. Street Outreach

- a. Number of persons placed in shelter or Safe Havens
- b. Number of persons with more non-cash benefits at program exit
- c. Number of persons receiving case management

2. Emergency Shelter

- a. Number of persons exiting to temporary/transitional housing destinations
- b. Number of persons exiting to permanent housing destinations
- c. Number of persons receiving case management

3. Homeless Prevention

- a. Number of persons who maintained their permanent housing for three months
- b. Number of persons exiting to permanent housing destinations
- c. Number of with higher income at program exit
- d. Number of persons with more non-cash benefits at program exit
- e. Number of persons receiving case management

4. Rapid Re-housing

- a. Number of persons who maintained their permanent housing for three months
- b. Number of persons exiting to permanent housing destinations
- c. Number of persons with higher income at program exit
- d. Number of persons with more non-cash benefits at program exit
- e. Number of persons receiving case management

Monitoring will include the following which are federal requirements:

- Formal and advance notification of on-site visits
- Pre-visit preparation based on review of existing information
- Records related to monitoring reviews
- Review of sub-recipient Policy and Procedure Manual and requirements
- Assurance that ESG funds are being utilized as originally planned and are for the eligible activities
- Determination whether costs are properly classified and if spending limits on certain activities have been properly adhered to
- Review and check that financial regulations and management requirements are appropriately being followed e.g. financial records, reports or audits

- Assurance that program disbursements or drawdown funds are in compliance with all requirements
- · Review of client record file
- Notation of any changes in the use of ESG fund or any other isues

Reporting performance and expenditure data to TDHCA:

TDHCA requires monthly performance and expenditure reports to be submitted in the TDHCA Community Affairs Contract System before the 15th of each month which will be submitted timely by the HMIS Administrator.

Receiving reimbursements from TDHCA and disbursing reimbursements to sub-sub recipients:

Upon approval of funding and implementation of the programs funded under ESG, HOTHC requires that partner agencies submit invoices for funding reimbursements no later than the 10th of each month. Each request for reimbursement is reviewed for eligibility of expenditures, accuracy, and documentation of eligible homeless status per the McKinney-Vento homeless definition.

Each request for reimbursement is reviewed by the following:

Chair of HOTHC Board of Directors
Treasurer of HOTHC Board of Directors

Reimbursement comes via direct deposit to HOTHC from TDHCA following approval of the expenditures reported in the Community Affairs Contract System.

HOTHC will issue timely payments for reimbursement after receipt of funds from TDHCA

Section Thirteen: Access and Security

Policy:

- 1. To obtain eLOCCS access staff are required to submit:
 - a. Form HUD-27054, LOCCS Voice Response System Access Authorization Form https://portal.hud.gov/hudportal/documents/huddoc?id=27054.pdf
 - b. Rules of Behavior Form "Exhibit A"
- 2. Forms are to be submitted to the President of the Heart of Texas Homeless Coalition.

Appendix A

TX 604 Waco/McLennan County CONTINUUM of CARE (CoC)

Code of Conduct, Conflict of Interest And Recusal Policies Form

Purpose

The purpose of the Code of Conduct, Conflict of Interest, and Recusal Policies is to maintain high ethical standards and establish procedures which guide the recusal process and administrative or disciplinary actions for violations. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

Conflict of Interest

An officer, member, member of a committee, agent or hired staff, including staff hired through MOU or Pass Through Agreement, with governing board delegated powers must disclose the existence of possible direct or indirect financial, or material gain to the governing board or committee with governing board delegated powers. This includes real or apparent conflicts of interest that may arise among officers, employees or agents, or any member of his or her immediate family, his or her partner or an organization that employs any of the indicated parties. This includes organizational conflicts of interest.

After disclosure, he/she may choose to voluntarily relinquish voting rights or abstain from serving on a committee relevant to the award of grants, provision of financial benefits, transaction or arrangement. If further determination is warranted, he/she shall leave the governing board or committee meeting while determination of a possible conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

If a conflict of interest exists, the individual with the association will be required to abstain from voting or serving on a committee with governing board delegated powers.

If the governing board or committee has reasonable cause to believe an officer or committee member has failed to disclose actual or possible conflicts of interest, it shall inform the individual of the basis for such belief and afford the individual an opportunity to explain the alleged failure to disclose. If, after hearing the individual's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action which could include ensuring the individual with the association abstains from voting or serving on a committee with governing board delegated powers up to dismissal of the individual from board or committee membership.

Acceptance of Gifts or Favors

An officer, member, member of a committee, agent or employee, including staff hired through MOU or Pass Through Agreement, may neither solicit nor accept gifts or gratuities, favors or anything in excess of minimum value from potential grant awardees, contractors, or parties to sub agreements where the receipt would either compromise impartial performance or give the appearance of compromising impartial performance.

If the governing board or committee has reasonable cause to believe an officer, committee member, agent or employee has violated this policy, it shall inform the individual of the basis for such belief and afford the individual an opportunity to explain the alleged violation. If, after hearing the individual's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has violated policy, it shall take appropriate disciplinary and corrective action which could include dismissal of the individual from board or committee membership.

Fraud Intolerance

The term fraud refers to, but is not limited to: intentionally entering false or erroneous information into electronic software systems; any dishonest or fraudulent act; forgery or alteration of any official document; misappropriation of funds, supplies, or Continuum of Care materials; improper handling or reporting of money or financial transactions; profiting by self or others as a result of inside knowledge; destruction or intentional disappearance of records, furniture, fixtures, or equipment; accepting or seeking anything of material value from vendors or persons providing services or materials to the Continuum of Care for personal benefit; or any similar or related irregularities.

Fraudulent acts will not be tolerated and may result in termination from Board membership. Fraudulent acts will be pursued to the fullest extent and may result in criminal charges.

A Board Member who has reason to believe that there may have been an instance of fraud, improper action, or other illegal act in connection with a Continuum of Care program, function or activity shall report it immediately to the TX 604 HOTHC Board.

Improper actions are actions undertaken by a Board Member in the performance of their official duties that: (a) are in violation of any federal, state, or local law; or (b) constitute an abuse of authority; or (c) create a substantial, specific danger to public health or safety; or (d) misuse of Continuum of Care funds; or (e) represent a conflict of interest.

Reported incidences will be investigated as expeditiously as possible by the Governance Committee and/or Governance Committee Co-Chair members as appropriate. When an investigation confirms that fraud or an illegal act(s) has occurred, appropriate corrective action will be taken.

I accept the terms of this Code of Conduct, Conflict of Interest and Recusal Policies and understand that failure to comply with it may result in dismissal from the Board and appropriate legal action.

Signature	 Date	

Appendix B

TX 604 Waco/McLennan County CONTINUUM of CARE (CoC)

Heart of Texas Homeless Coalition Bylaws

Appendix C

Rules of Behavior for HUD Systems

The U.S. Department of Housing and Urban Development has granted access to you to utilize the Department's automated information resources. However, as a condition of receiving this access, you are required to be aware of the Department's system security policies and to abide by these policies. Security policy emphasizes awareness practices for the purpose of safeguarding the Department's valuable information resources.

The system user identification (USERID) and password issued to you are your means to access these resources. They are to be used solely in connection with the performance of your responsibilities as set forth in your job description, contract or agreement(s) with the Department. Use by anyone other than yourself is expressly prohibited. You agree to be responsible for the confidentiality of the assigned information and accountable for all activity with your user identification (USERID). Further, you agree that you will not provide this confidential USERID/password to another user nor will you sign on to HUD systems so that another person may access or operate the workstation in your absence or on your behalf. Actions of this type constitute a breach of system security and will result in immediate termination of your assigned USERID/password from the system.

In addition, you agree to:

- (a) Log-off the system when leaving the system/workstation area;
- (b) Refrain from leaving written passwords in the workstation area;
- (c) Avoid creating a personal password that can be easily associated with you;
- (d) Avoid posting printouts of sensitive output data on bulletin boards;
- (e) Avoid leaving system output reports unattended or unsecured;
- (f) Control input documents by returning them to files or forwarding them to the appropriate contact person in your office;
- (g) Avoid violation of the Privacy Act which requires confidentiality of personal data contained in government and contractor data files;
- (h) Immediately contact the HUD Inspector General's Office, as appropriate, regarding any suspected violation or breach of system security;
- (i) Cooperate in providing personal background information to be used in conducting security background checks to the extent required by Federal regulations;
- (j) Respond to any inquiries and requests for information you may receive from either the HUD Headquarters or management officials regarding system security practices.
- (k) Protect all electronic/optical media and hardcopy documentation containing sensitive information and properly dispose of it by shredding hardcopy documentation, or by contacting the HITS Help Desk to dispose of electronic/optical media.
- (I) Avoid saving sensitive HUD information on the local drive of a laptop, personally owned computer, or other mobile or portable technology ("flash drives", removable/external hard drives, etc.).
- (m) If sensitive data must be stored on any type of HUD-approved mobile/portable technology (laptops, removable hard drives, "flash drives", etc.), ensure that it is protected via encryption.
- (n) Individuals who telework or remotely access HUD information should do so only through approved remote access solutions (such as hudmobile.hud.gov), and should safeguard all sensitive information accessed in this manner

Name (Signature)	Name (Printed)	Date	
Organization/Agency Represented			

PIT Count Data for TX-604 - Waco/McLennan County CoC

Total Population PIT Count Data

	2016 PIT	2017 PIT
Total Sheltered and Unsheltered Count	267	221
Emergency Shelter Total	136	93
Safe Haven Total	1	2
Transitional Housing Total	87	67
Total Sheltered Count	224	162
Total Unsheltered Count	43	59

Chronically Homeless PIT Counts

	2016 PIT	2017 PIT
Total Sheltered and Unsheltered Count of Chronically Homeless Persons	35	26
Sheltered Count of Chronically Homeless Persons	14	10
Unsheltered Count of Chronically Homeless Persons	21	16

Homeless Households with Children PIT Counts

	2016 PIT	2017 PIT
Total Sheltered and Unsheltered Count of the Number of Homeless Households with Children	43	28
Sheltered Count of Homeless Households with Children	43	27
Unsheltered Count of Homeless Households with Children	0	1

Homeless Veteran PIT Counts

	2011	2016	2017
Total Sheltered and Unsheltered Count of the Number of Homeless Veterans	40	17	19
Sheltered Count of Homeless Veterans	23	11	13
Unsheltered Count of Homeless Veterans	17	6	6

2017 HDX Competition Report HIC Data for TX-604 - Waco/McLennan County CoC

HMIS Bed Coverage Rate

Project Type	Total Beds in 2017 HIC	Total Beds in 2017 HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ES) Beds	145	64	68	83.95%
Safe Haven (SH) Beds	3	0	0	0.00%
Transitional Housing (TH) Beds	78	13	60	92.31%
Rapid Re-Housing (RRH) Beds	20	20	0	NA
Permanent Supportive Housing (PSH) Beds	131	5	39	30.95%
Other Permanent Housing (OPH) Beds	0	0	0	NA
Total Beds	377	102	167	60.73%

PSH Beds Dedicated to Persons Experiencing Chronic Homelessness

Chronically Homeless Bed Counts	2016 HIC	2017 HIC
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homeless persons identified on the HIC	44	10

Rapid Rehousing (RRH) Units Dedicated to Persons in Household with Children

Households with Children	2016 HIC	2017 HIC
RRH units available to serve families on the HIC		8

HIC Data for TX-604 - Waco/McLennan County CoC

Rapid Rehousing Beds Dedicated to All Persons

All Household Types	2016 HIC	2017 HIC
RRH beds available to serve all populations on the HIC		20

FY2016 - Performance Measurement Module (Sys PM)

Summary Report for TX-604 - Waco/McLennan County CoC

For each measure enter results in each table from the System Performance Measures report generated out of your CoCs HMIS System. There are seven performance measures. Each measure may have one or more "metrics" used to measure the system performance. Click through each tab above to enter FY2016 data for each measure and associated metrics.

RESUBMITTING FY2015 DATA: If you provided revised FY 2015 data, the original FY2015 submissions will be displayed for reference on each of the following screens, but will not be retained for analysis or review by HUD.

ERRORS AND WARNINGS: If data are uploaded that creates selected fatal errors, the HDX will prevent the CoC from submitting the System Performance Measures report. The CoC will need to review and correct the original HMIS data and generate a new HMIS report for submission.

Some validation checks will result in warnings that require explanation, but will not prevent submission. Users should enter a note of explanation for each validation warning received. To enter a note of explanation, move the cursor over the data entry field and click on the note box. Enter a note of explanation and "save" before closing.

Measure 1: Length of Time Persons Remain Homeless

This measures the number of clients active in the report date range across ES, SH (Metric 1.1) and then ES, SH and TH (Metric 1.2) along with their average and median length of time homeless. This includes time homeless during the report date range as well as prior to the report start date, going back no further than October, 1, 2012.

Metric 1.1: Change in the average and median length of time persons are homeless in ES and SH projects. Metric 1.2: Change in the average and median length of time persons are homeless in ES, SH, and TH projects.

a. This measure is of the client's entry, exit, and bed night dates strictly as entered in the HMIS system.

FY2016 - Performance Measurement Module (Sys PM)

	Universe (Persons)			Average LOT Homeless (bed nights)			Median LOT Homeless (bed nights)				
	Submitted FY2015	Revised FY2015	Current FY	Submitted FY2015	Revised FY2015	Current FY	Difference	Submitted FY2015	Revised FY2015	Current FY	Difference
1.1 Persons in ES and SH	893	893	907	25	25	33	8	7	7	10	3
1.2 Persons in ES, SH, and TH	1074	1074	1067	46	46	50	4	12	12	14	2

b.

This measure includes data from each client's "Length of Time on Street, in an Emergency Shelter, or Safe Haven" (Data Standards element 3.17) response and prepends this answer to the client's entry date effectively extending the client's entry date backward in time. This "adjusted entry date" is then used in the calculations just as if it were the client's actual entry date.

NOTE: Due to the data collection period for this year's submission, the calculations for this metric are based on the data element 3.17 that was active in HMIS from 10/1/2015 to 9/30/2016. This measure and the calculation in the SPM specifications will be updated to reflect data element 3.917 in time for next year's submission.

	Universe (Persons)					Median LOT Homeless (bed nights)		
	Previous FY	Current FY	Previous FY	Current FY	Difference	Previous FY	Current FY	Difference
1.1 Persons in ES and SH	-	874	-	196		-	25	
1.2 Persons in ES, SH, and TH	-	1034	-	191		-	41	

FY2016 - Performance Measurement Module (Sys PM)

Measure 2: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.

	Exited to a Housing D	Persons who a Permanent Destination (2 s Prior)	Returns to	Homelessn han 6 Montl			o Homelessn to 12 Month	ness from 6 is	Returns to Homelessness from 13 to 24 Months		Number of Returns in 2 Years		
	Revised FY2015	# of Returns	Revised FY2015	# of Returns	% of Returns	Revised FY2015	# of Returns	% of Returns	Revised FY2015	# of Returns	% of Returns	# of Returns	% of Returns
Exit was from SO	0	1	0	1	100%	0	0	0%	0	0	0%	1	100%
Exit was from ES	75	77	66	34	44%	0	5	6%	0	2	3%	41	53%
Exit was from TH	107	119	2	4	3%	0	1	1%	2	2	2%	7	6%
Exit was from SH	0	0	0	0		0	0		0	0		0	
Exit was from PH	26	7	0	0	0%	1	0	0%	1	1	14%	1	14%
TOTAL Returns to Homelessness	208	204	68	39	19%	1	6	3%	3	5	2%	50	25%

Measure 3: Number of Homeless Persons

Metric 3.1 – Change in PIT Counts

FY2016 - Performance Measurement Module (Sys PM)

This measures the change in PIT counts of sheltered and unsheltered homeless person as reported on the PIT (not from HMIS).

	2015 PIT Count	Most Recent PIT Count	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	255	267	12
Emergency Shelter Total	96	136	40
Safe Haven Total	2	1	-1
Transitional Housing Total	93	87	-6
Total Sheltered Count	191	224	33
Unsheltered Count	64	43	-21

Metric 3.2 – Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Unduplicated Total sheltered homeless persons	1086	1086	1092	6
Emergency Shelter Total	900	900	900	0
Safe Haven Total	0	0	28	28
Transitional Housing Total	242	242	197	-45

FY2016 - Performance Measurement Module (Sys PM)

Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

Metric 4.1 – Change in earned income for adult system stayers during the reporting period

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Number of adults (system stayers)	19	23	25	2
Number of adults with increased earned income	1	1	2	1
Percentage of adults who increased earned income	5%	4%	8%	4%

Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Number of adults (system stayers)	19	23	25	2
Number of adults with increased non-employment cash income	6	6	3	-3
Percentage of adults who increased non-employment cash income	32%	26%	12%	-14%

Metric 4.3 – Change in total income for adult system stayers during the reporting period

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Number of adults (system stayers)	19	23	25	2
Number of adults with increased total income	5	5	5	0
Percentage of adults who increased total income	26%	22%	20%	-2%

FY2016 - Performance Measurement Module (Sys PM)

Metric 4.4 – Change in earned income for adult system leavers

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Number of adults who exited (system leavers)	88	87	87	0
Number of adults who exited with increased earned income	29	29	32	3
Percentage of adults who increased earned income	33%	33%	37%	4%

Metric 4.5 – Change in non-employment cash income for adult system leavers

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Number of adults who exited (system leavers)	88	87	87	0
Number of adults who exited with increased non-employment cash income	7	6	9	3
Percentage of adults who increased non-employment cash income	8%	7%	10%	3%

Metric 4.6 – Change in total income for adult system leavers

	Submitted FY2015	Revised FY2015	Current FY	Difference
Universe: Number of adults who exited (system leavers)	88	87	87	0
Number of adults who exited with increased total income	35	34	38	4
Percentage of adults who increased total income	40%	39%	44%	5%

FY2016 - Performance Measurement Module (Sys PM)

Measure 5: Number of persons who become homeless for the 1st time

Metric 5.1 – Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS

	Submitted FY 2015	Revised FY2015	Current FY	Difference
Universe: Person with entries into ES, SH or TH during the reporting period.	1161	1161	1011	-150
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	309	309	285	-24
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)	852	852	726	-126

Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

	Submitted FY 2015	Revised FY2015	Current FY	Difference
Universe: Person with entries into ES, SH, TH or PH during the reporting period.	1169	1169	1037	-132
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	311	311	291	-20
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)	858	858	746	-112

FY2016 - Performance Measurement Module (Sys PM)

Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD's Homeless Definition in CoC Program-funded Projects

This Measure is not applicable to CoCs in the FY2016 Resubmission reporting period.

Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing

Metric 7a.1 – Change in exits to permanent housing destinations

	Submitted FY 2015	Revised FY2015	Current FY	Difference
Universe: Persons who exit Street Outreach	109	109	93	-16
Of persons above, those who exited to temporary & some institutional destinations	44	44	23	-21
Of the persons above, those who exited to permanent housing destinations	24	24	30	6
% Successful exits	62%	62%	57%	-5%

Metric 7b.1 – Change in exits to permanent housing destinations

FY2016 - Performance Measurement Module (Sys PM)

	Submitted FY 2015	Revised FY2015	Current FY	Difference
Universe: Persons in ES, SH, TH and PH-RRH who exited	959	960	950	-10
Of the persons above, those who exited to permanent housing destinations	120	120	129	9
% Successful exits	13%	13%	14%	1%

Metric 7b.2 – Change in exit to or retention of permanent housing

	Submitted FY 2015	Revised FY2015	Current FY	Difference
Universe: Persons in all PH projects except PH-RRH	60	60	82	22
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	55	56	75	19
% Successful exits/retention	92%	93%	91%	-2%

FY2016 - SysPM Data Quality

TX-604 - Waco/McLennan County CoC

This is a new tab for FY 2016 submissions only. Submission must be performed manually (data cannot be uploaded). Data coverage and quality will allow HUD to better interpret your Sys PM submissions.

Your bed coverage data has been imported from the HIC module. The remainder of the data quality points should be pulled from data quality reports made available by your vendor according to the specifications provided in the HMIS Standard Reporting Terminology Glossary. You may need to run multiple reports into order to get data for each combination of year and project type.

You may enter a note about any field if you wish to provide an explanation about your data quality results. This is not required.

FY2016 - SysPM Data Quality

	All ES, SH			All TH			All PSH, OPH			All RRH			All Street Outreach							
	2012- 2013	2013- 2014	2014- 2015	2015- 2016	2012- 2013	2013- 2014	2014- 2015	2015- 2016	2012- 2013	2013- 2014	2014- 2015	2015- 2016	2012- 2013	2013- 2014	2014- 2015	2015- 2016	2012- 2013	2013- 2014	2014- 2015	2015- 2016
1. Number of non- DV Beds on HIC	76	57	57	71	95	114	114	94	88	88	88	90								
2. Number of HMIS Beds	68	54	54	68	95	96	96	82	28	28	28	30								
3. HMIS Participation Rate from HIC (%)	89.47	94.74	94.74	95.77	100.00	84.21	84.21	87.23	31.82	31.82	31.82	33.33								
4. Unduplicated Persons Served (HMIS)	569	1002	900	895	228	233	242	197	65	54	60	82	0	0	0	0	0	0	0	1
5. Total Leavers (HMIS)	539	942	841	843	173	172	175	151	17	14	13	17	0	0	0	0	0	0	0	1
6. Destination of Don't Know, Refused, or Missing (HMIS)	2	280	182	49	40	30	31	14	5	4	0	0	0	0	0	0	0	0	0	0
7. Destination Error Rate (%)	0.37	29.72	21.64	5.81	23.12	17.44	17.71	9.27	29.41	28.57	0.00	0.00								0.00

Submission and Count Dates for TX-604 - Waco/McLennan County CoC

Date of PIT Count

	Date	Received HUD Waiver
Date CoC Conducted 2017 PIT Count	1/26/2017	

Report Submission Date in HDX

	Submitted On	Met Deadline
2017 PIT Count Submittal Date	5/1/2017	Yes
2017 HIC Count Submittal Date	5/1/2017	Yes
2016 System PM Submittal Date	6/4/2017	Yes



Heart of Texas Homeless Coalition P. O. Box 23025 Waco, TX 76702

September 6, 2017

Kathy Reid Executive Director Family Abuse Center PO Box 20395 Waco, TX 76702

Dear Ms. Reid,

I am writing to officially inform you of the outcome of the Scoring and Ranking Committee evaluation of the project applications your agency submitted to The Heart of Texas Homeless Coalition. On September 5, 2017, the following projects were accepted to receive the following recommended funding amount in the 2017 Continuum of Care NOFA competition:

- 1. Family Abuse Center Permanent Supportive Housing Project ranked 3rd and the amount of funding recommended is \$49,906.
- 2. Family Abuse Center Transitional Housing Project ranked 5th and the amount of funding recommended is \$131,816.
- 3. Family Abuse Center Rapid Re-Housing Project ranked 6th and the amount of funding recommended is \$81,947.
- 4. Family Abuse Center Permanent Supportive Housing Expansion Project ranked 13th and the amount of funding recommended is \$49,906.

Please do not hesitate to contact me if you have any questions and thank you for your submissions to this year's competition.

Sincerely,

Nicole Wiscombe CoC Administrator



Heart of Texas Homeless Coalition P. O. Box 23025 Waco, TX 76702

September 6, 2017

Shaun Lee Program Manager Heart of Texas Region MHMR 110 S. 12th St. Waco, TX 76703

Dear Mr. Lee,

I am writing to officially inform you of the outcome of the Scoring and Ranking Committee evaluation of the project applications your agency submitted to The Heart of Texas Homeless Coalition. On September 5, 2017, the following projects were accepted to receive the following recommended funding amount in the 2017 Continuum of Care NOFA competition:

- 1. HOTRMHMR Permanent Supportive Housing Grant 1 Project ranked 2nd and the amount of funding recommended is \$125,147.
- 2. HOTRMHMR Permanent Supportive Housing Grant 2 Project ranked 4th and the amount of funding recommended is \$112,190.
- 3. HOTRMHMR Housing Navigator Project ranked 8th and the amount of funding recommended is \$93,037.
- 4. HOTRMHMR Rapid Re-Housing Project ranked 9th and the amount of funding recommended is \$73,334.
- 5. HOTRMHMR Housing Navigator Expansion Project ranked 11th and the amount of funding recommended is \$80,011.

Please do not hesitate to contact me if you have any questions and thank you for your submission to this year's competition.

Sincerely,

Nicole Wiscombe CoC Administrator



Heart of Texas Homeless Coalition P. O. Box 23025 Waco, TX 76702

September 6, 2017

Major Caldwell The Salvation Army of Waco 4721 W. Waco Dr. Waco, TX 76710

Dear Major Caldwell,

I am writing to officially inform you of the outcome of the Scoring and Ranking Committee evaluation of the project applications your agency submitted to The Heart of Texas Homeless Coalition. On September 5, 2017, the following projects were accepted to receive the following recommended funding amount in the 2017 Continuum of Care NOFA competition:

- Salvation Army Rapid Re-Housing Project ranked 7th and the amount of funding recommended is \$73,997. Based on the project's score, points were lost in the areas of meeting HUD priorities; average daily unit utilization; percent of participants who gained or increased earned and other income from entry to exit; percent of participants with earned or other income; leavers who exited to shelter, streets, or unknown; targeting hard to serve; timely spending of funding; and HMIS data completeness. The Scoring and Ranking Committee discussed the vital role that these services play in our CoC and community, and our need to continue these services, so they utilized a reallocation formula to determine funding recommendations based on previous expenditures. The Scoring and Ranking Committee requests that The Salvation Army submit in its project application and to the Heart of Texas Homeless Coalition a project improvement plan to specify how the project will improve performance and meet standards in the upcoming year. The purpose of this project improvement plan is to hopefully reduce recapture of additional funds by HUD due to poor funds expenditure and project performance. I will re-open your project application for Margie to edit the submission (budget and project improvement plan).
- 2. Salvation Army Rapid Re-Housing Expansion Project ranked 10th and the amount of funding recommended is \$16,684.
- 3. Salvation Army Coordinated Entry Project ranked 12th and the amount of funding recommended is \$43,590.

Please be aware that you have the ability to appeal the CoC's decision to reduce your funding. The process for doing this is outlined in the Heart of Texas Homeless Coalition Grievance Policies and Procedures found at http://www.heartoftexashomeless.org/?page_id=841 and in the NOFA. Please do not hesitate to contact me if you have any questions and thank you for your submissions to this year's competition.

Sincerely,

Nicole Wiscombe CoC Administrator