ORANGE COUNTY CONTINUUM OF CARE
POLICIES, PROCEDURES and STANDARDS COMMITTEE
Tuesday, September 12, 2023
3:30 p.m. – 5:00 p.m.

> **Location:**
> **Virtually on Teams**
> **Meeting Link: Click Here**
> **Meeting ID: 255 961 398 574**
> **Passcode: Va85iy**

Committee Chair: Becks Heyhoe, Orange County United Way

Committee Members:
Judson Brown, City of Santa Ana
Nishtha Mohendra, Families Forward
Robert "Santa Bob" Morse, Individual
Christina Weckerly Ramirez, OC Health Care Agency
Eric Richardson, Volunteers of America
Maricela Rios-Faust, Human Options
Dr. Shauntina Sorrells, Orangewood Foundation

AGENDA

Welcome and Introductions – Becks Heyhoe, Chair

Public Comments – Members of the public may address the Policies, Procedures and Standards (PPS) Committee on items listed within this agenda or matters not appearing on the agenda so long as the subject matter is within the jurisdiction of the PPS Committee. Members of the public may address the PPS Committee with public comments on agenda items after the PPS Committee member discussion. Comments will be limited to three minutes. If there are more than five public speakers, this time will be reduced to two minutes. In order to address the PPS Committee, members of the public are to enter their name and agenda item number in the chat box to be placed in a queue. PPS Committee staff will call your name in the order listed in the chat box.

CONSENT CALENDAR

1. Approve the PPS Committee Meeting Minutes from August 15, 2023.

BUSINESS CALENDAR

1. **Orange County Homeless Management Information System (HMIS) Policies and Procedures** – Sarah Jones, Continuum of Care (CoC) Manager, Office of Care Coordination
   a. Discussion on Agency Access as detailed in the HMIS Policies and Procedures, as it relates to law enforcement.
   b. Recommend affirmation of the current Agency Access policy, as detailed in the HMIS Policies and Procedures.

2. **2023 CoC Board Nomination and Selection Process Update** – Becks Heyhoe, Chair and Sarah Jones, CoC Manager, Office of Care Coordination
   a. Outreach effort to identify CoC Nominating Committee membership.

3. **Continuum of Care Updates** – Sarah Jones, CoC Manager, Office of Care Coordination

4. **Adjournment to**: Regular meeting on October 10, 2023, 3:30 p.m. – 5:00 p.m.

ORANGE COUNTY CONTINUUM OF CARE
POLICIES, PROCEDURES and STANDARDS COMMITTEE
Tuesday, August 15, 2023

11:00 a.m. – 12:00 p.m.

> **Location:**
> **Virtually on Teams**
> **Meeting Link: Click Here**
> **Meeting ID: 255 961 398 574**
> **Passcode: Va85iy**

Committee Chair: Becks Heyhoe, Orange County United Way

Committee Members:
Judson Brown, City of Santa Ana
Christina Weckerly Ramirez, OC Health Care Agency
Dr. Shauntina Sorrells, Orangewood Foundation
Eric Richardson, Volunteers of America
Nishtha Mohendra, Families Forward
Robert Morse, Individual
Maricela Rios-Faust, Human Options

MINUTES

Welcome and Introductions – Becks Heyhoe, Chair

1. Chair Becks Heyhoe called the meeting to order at 11:02 a.m.
2. Roll Call
    i. Present: Chair Becks Heyhoe, Judson Brown, Nishtha Mohendra, Robert Morse, and Maricela Rios-Faust
    ii. Absent Excused: Dr. Shauntina Sorrells
    iii. Eric Richardson and Christina Weckerly Ramirez arrived at the meeting during Consent Calendar. Eric Richardson was excused during Business Calendar Agenda Item 2 and did not vote on Business Calendar Items 2 to 3.

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CONSENT CALENDAR

1. **Approve the PPS Committee Meeting Minutes from February 14, 2023.**

Chair Becks Heyhoe motioned to approve the item. Maricela Rios-Faust seconded the motion. Chair Becks Heyhoe and Judson Brown voted yes. Eric Richardson, Nishtha Mohendra, Robert Morse, and Maricela Rios-Faust abstained. Motion did not carry.

2. **Approve the PPS Committee Meeting Minutes from June 13, 2023.**

Robert Morse motioned to approve the item. Nishtha Mohendra seconded the motion. Chair Becks Heyhoe, Judson Brown, Nishtha Mohendra, Robert Morse, and Christina Weckerly Ramirez voted yes. Eric Richardson and Maricela Rios-Faust abstained. Motion passed.

BUSINESS CALENDAR

1. **Homeless Management Information System (HMIS) Minimum Participation Requirements for Public Housing Authorities** – Sarah Jones, Continuum of Care (CoC) Manager, Office of Care Coordination

Sarah Jones provided background on the Orange County HMIS Policies and Procedures which outlines minimum standards of participation in the Orange County HMIS to ensure data quality and support general best practices. Due to the different structure and requirements that Public Housing Authorities (PHAs) have for funding, there is an established requirement for PHA's to report to the U.S. Department of Housing and Urban Development (HUD). Currently within the Orange County CoC, there has been an identified need to update HMIS minimum participation requirements specifically for PHAs that would support their continued engagement in the Orange County CoC and Coordinated Entry System (CES) processes.

Recommended Action a: Recommend the HMIS minimum participation requirements for PHAs for review and approval by the Orange County CoC Board.

Judson Brown motioned to approve the recommended action. Robert Morse seconded the motion. Motion passed unanimously.

PPS Committee Member Comment:
- Judson Brown expressed appreciation for the Office of Care Coordination working collaboratively with the PHAs to bring the item forward and reduce the duplication of data entry. Judson Brown commented that the administrative burden that PHAs have is overwhelming with substantial difficulties in hiring and maintaining staff and the collaboration to bring this item and solution forward is appreciated, as well as the continued collaboration to refine this solution. Judson Brown expanded on the importance of the item and expressed strong support for the item.

Public Comments:
- Alma Huerta from Anaheim Housing Authority inquired about data entry of updates for family composition, changes in income, and other interim updates.
- Kerrin Cardwell from Anaheim Housing Authority expressed concern as she would like the requirement to enter income and family compositions updates to be removed. Kerrin Cardwell also expressed concern about the administrative burden on the staff, duplicative reporting to HUD, and data entry, and suggested the minimum requirements still be addressed to cover the interim changes as well.

2. **CoC Nominating and Selection Process Review Ad Hoc Recommendation** – Felicia Boehringer, CoC Administrator, Office of Care Coordination, and CoC Nominating and Selection Process Review Ad Hoc

At the February 14, 2023, meeting, the PPS Committee membership approved the creation of the CoC Nominating and Selection Process Review Ad Hoc (Ad Hoc) to review CoC Board nomination and selection process recommendations provided by the 2022 CoC Nominating Committee. The Ad Hoc expressed a desire to ensure the process of becoming a CoC Board member is accessible and equitable, considering people with lived expertise of homelessness and those engaging leadership in the Orange County CoC, by eliminating the requirement for a resume submission, reducing CoC-specific jargon, and including clear language. A revised CoC Board Candidate Interest Packet had been drafted, which included additional information on the CoC Board Member responsibilities and qualifications, details on the nominating and selection process and targeted questions that sought to gain insight on the candidate's expertise and interest in serving.

Ad Hoc member Christina Weckerly Ramirez shared that the goal of the packet is to not only focus on accessibility and inclusion, but to also remove and address barriers, assess strengths, and clarify expectations, to determine if a candidate's strengths and contributions would align with the vision and expectations of the CoC Board.

Recommended Action b: Approve drafted CoC Board Candidate Interest Packet for the 2023 CoC Board Seat Nomination and Election as recommended by the CoC Nominating and Selection Process Review Ad Hoc.

Robert Morse motioned to approve the recommended action. Nishtha Mohendra seconded the motion. Chair Becks Heyhoe, Judson Brown, Christina Weckerly Ramirez, Nishtha Mohendra, Robert Morse, and Maricela Rios-Faust voted yes. Motion passed.

PPS Committee Member Comments:
- Maricela Rios-Faust inquired if any candidate that fills out the form would automatically move forward to an interview process or if there is a screening before an interview process. Maricela Rios-Faust suggested that there would be an opportunity for everyone to be interviewed and not screened out, to consider candidates that are conversationally better at describing qualifications. By doing so, it would also allow for a more diverse base of candidates. Maricela Rios-Faust suggested further exploring recruitment strategies.
- Nishtha Mohendra inquired about the timeline for implementing the ideas that are being discussed and if it will be applied to the upcoming cycle at the end of this year.

Public Comment:
- Dawn Price, Chair of the CoC Board, wanted to express the importance of this item and suggested this item be added to the agenda of a future Service Provider Forum and other committee meetings to promote the possibility of participation in the CoC Board.

3. **HMIS Access Working Group Member Appointment Procedure** – Sarah Jones, CoC Manager, Office of Care Coordination

The HMIS Access Working Group meets monthly or as needed to review HMIS Access Applications and agencies not meeting the HMIS minimum participation requirements, as well as continue to refine the process for facilitating equitable review of applications received. Currently, the Orange County HMIS Policies and Procedures states that, "the HMIS Access Ad Hoc will be comprised of two to three CoC members appointed by the CoC Board membership, the CoC Collaborative Applicant and the HMIS Lead". Further detail on the procedure for appointing new members, including desired qualifications, is needed to support with filling vacancies in the HMIS Access Working Group. Utilizing the feedback received from the PPS Committee at the meeting on June 13, 2023, the Office of Care Coordination drafted the HMIS Access Working Group Appointment Procedure which details the

desired   qualifications   for   HMIS   Access   Working   Group.

Recommended Action a: Recommend vacancy procedure and desired qualifications for HMIS Access Working Group members.

Maricela Rios-Faust motioned to approve the recommended action. Robert Morse seconded the motion. Chair Becks Heyhoe, Judson Brown, Christina Weckerly Ramirez, Nishtha Mohendra, Robert Morse, and Maricela Rios-Faust voted yes. Motion passed.

Public Comment:
- John Underwood inquired if the working group will be subject to all California state meeting requirements.

4. **Orange County HMIS Policies and Procedures** – Sarah Jones, CoC Manager, Office of Care Coordination

Sarah Jones provided background on the Orange County HMIS Policies and Procedures as it relates to Agency Access and law enforcement. Feedback was provided at the March 2023 CoC Board meeting by a number of law enforcement agencies regarding access to the Individual Shelter Bed Reservation System within HMIS. To support better dialogue and conversation between the Office of Care Coordination, the CoC Board and law enforcement meeting was held on Friday, May 12, 2023. This feedback from the May 12th meeting was shared with the Lived Experience Advisory Committee on May 2, 2023, for discussion.

PPS Committee Member Comments:
- Judson Brown strongly encouraged the PPS Committee to add an agenda item to provide law enforcement access to HMIS, specifically to the bed reservation system. Judson Brown stated that upon hearing concerning public comments in March 2023 from Homeless Liaison Officers (HLOs) that directly work with people experiencing homeless within Orange County, it would be beneficial to be responsive to those concerns and have a robust conversation about that item.
- Maricela Rios-Faust agreed with Judson Brown's recommendation for the need to have a robust conversation regarding the item to explore ways to move forward.
- Christina Weckerly Ramirez wanted more discussion and expressed concern about giving access to the bed reservation system, as law enforcement would then have access to everything in HMIS. Christina Weckerly Ramirez stated that it is a bigger picture concern not only for the PPS Committee, but also the CES Steering Committee. Christina Weckerly Ramirez inquired how to best serve the client and keep the client at the center of the discussion without disenfranchising law enforcement partners by not providing access.
- Nishtha Mohendra requested to create more time for discussion on this item to ensure it has the right attention and mindfulness.
- Robert Morse inquired about the technology and asked why the HMIS system cannot be adjusted in order to have information and access separated. Robert "Santa Bob" Morse inquired about alternative assistance to create a solution to the access and information issue.
- Chair Becks Heyhoe commented that 2-1-1 Orange County (211OC) was responsible for operating HMIS and Orange County United Way (OCUW) acquired 211OC as of July 1, 2023. OCUW has now taken on the responsibility of HMIS, and this issue will be looked into to find any potential solutions.

Public Comments:
- Sergeant Juan Montiel of the Santa Ana Police Department expressed understanding of the privacy issues involving HMIS. Sergeant Montiel suggested a separate portal that HLOs can

utilize out that will allow direct referrals to the bed reservation system which would not require a HLO to connect with a street outreach worker. Sergeant Montiel clarified that the Yale Navigation Center only has 10 set-aside law enforcement beds out of a total of 425 beds and that nine cities must share those ten beds; however, Bridges at Kraemer Place has 20 set-aside beds with a smaller number of cities accessing those beds.

- Roland Perez, HLO of the Westminster Police Department, commented he does not need access to HMIS, but has two civilian employees that should have access in order to refer people to the bed reservation system and to bypass having to send information through various other representatives. Roland Perez concluded that a longer discussion would be informative as to why there is an issue to provide law enforcement with full access to HMIS.

5. **Continuum of Care Updates** – Sarah Jones, CoC Manager, Office of Care Coordination

Due to limited time, the CoC Updates were not shared verbally but available in the PowerPoint Presentation uploaded online. Sarah Jones noted that applicable updates will be shared at the next meeting of the PPS Committee.

6. **Adjournment**: Regular meeting on September 12, 2023, 3:30 p.m. – 5:00 p.m.

Date: September 12, 2023

Subject: Orange County Homeless Management Information System (HMIS) Policies and Procedures

Recommended Action:

b.   Recommend affirmation of the current Agency Access policy, as detailed in the HMIS Policies and Procedures.

Background and Analysis

The Orange County HMIS Policies and Procedures includes an Agency Access Policy (Section V.b.b.i) that was approved by the Continuum of Care (CoC) Board at the May 26, 2021, meeting. Section V.b.b.i. of the HMIS Policies and Procedures states,

> *Organizations receiving funding that requires HMIS participation will be given data entry access, but this does not necessarily include data sharing with other agencies. Law enforcement agencies and legal service providers receiving funding that requires HMIS participation will be given data entry access only.*

The County of Orange's (County) Office of Care Coordination as the Coordinated Entry System (CES) Lead operates the Shelter Bed Reservation System which utilizes the Coordinated Entry System within HMIS to refer individuals and families to emergency shelters programs. This includes the following County-operated shelter programs: Homekey, Bridges at Kraemer Place, and Yale Navigation Center. Given that the Shelter Bed Reservation System functions within HMIS, the Office of Care Coordination adheres to the HMIS Access and Participation Requirement Policy as detailed within the Orange County HMIS Policies and Procedures. The Office of Care Coordination, and the Orange County CoC Board, as the entity that approves the HMIS Policies and Procedures, received feedback and concerns from law enforcement related to accessing shelter beds for individuals.

At the March 2023 meeting of the CoC Board, feedback was provided by a number of law enforcement agencies regarding access to the Shelter Bed Reservation System within HMIS. To support conversation between the Office of Care Coordination, the CoC Board and law enforcement meeting was held on Friday, May 12, 2023. The feedback from the May 12, 2023, meeting was shared with the Lived Experience Advisory Committee on May 2, 2023, for discussion. At the August 15, 2023, meeting, the Policies, Procedures, and Standards (PPS) Committee membership engaged in discussion on Agency Access as detailed in the Orange County HMIS Policies and Procedures. During public comment, PPS Committee received additional feedback and concerns related to the Agency Access Policy from law enforcement agency representatives in attendance. Due to time constraints, a commitment was made to continue the discussion and agendized the item for the September 12, 2023, PPS Committee meeting, as well as the next meeting of the CoC Board. The CoC Board had robust dialogue on the topic of HMIS access at the August 23, 2023, meeting, aligning on the desire to have the PPS Committee discuss any potential changes within the current Agency Access policy as included in the Orange County HMIS Policies and Procedures.

The PPS Committee membership is being asked to consider discussion related to HMIS access and either affirm or not affirm the current Agency Access Policy. If the PPS Committee does not affirm the current Agency Access Policy, then further discussion will be had on how to best amend the policy.

Attachments

Attachment A – HMIS Policies and Procedures Section V. Agency Access Policy

Orange County HMIS Policies and Procedures Section V. (Pages 12 – 13)

V.   Agency Access

a. In order to be granted HMIS Access, an organization must be able to meaningfully contribute information related to homeless assistance projects and/or homelessness prevention projects to the Orange County CoC.

b. An organization that at minimum meets one of the following criteria will be granted access to HMIS:

    a. Manage a homeless assistance project and has the project included in HMIS to support an increase in bed coverage for the CoC. The following homeless assistance project types will increase bed coverage: emergency shelter, transitional housing, rapid rehousing, permanent supportive housing, and/or other permanent housing.

    b. Receive federal and/or state funding for the implementation and operations of a homeless assistance project and/or homelessness prevention project that requires HMIS participation.

        i. Organizations receiving funding that requires HMIS participation will be given data entry access, but this does not necessarily include data sharing with other agencies. Law enforcement agencies and legal service providers receiving funding that requires HMIS participation will be given data entry access only.

        ii. Victim service providers and legal service providers that are recipients of funds requiring participation in HMIS, but do not directly enter data into an HMIS, must use a comparable database. A comparable database allows the collection of the aggregate data needed for reporting while respecting the sensitive nature of the client-level information if it complies with all HMIS data, technical and security standards.

c. Organizations that do not meet the above listed criteria will be required to submit an HMIS Access Application for review and consideration by the HMIS Access Ad Hoc to further evaluate the request.

d. The HMIS Access Ad Hoc will be comprised of two to three CoC members appointed Board by the CoC Board membership, the CoC Collaborative Applicant and the HMIS Lead. The HMIS Access Ad Hoc will meet on an as-needed basis for the purposes of evaluating HMIS Access Applications.

e. The HMIS Access Application requires organizations to detail how their organization's participation in HMIS will be able to meaningfully contribute information related to homeless assistance projects or homelessness prevention projects to the Orange County CoC and how the HMIS access will improve the provision of homeless services in the Orange County CoC. The HMIS Access Application will also assist the HMIS Access Ad Hoc evaluate the organization's HMIS Data Sharing capabilities.

f. Organizations that meet the requirements for HMIS Access must be in compliance with all other aspects of the HMIS Policies and Procedures, including the HMIS Participating Agency Agreement and the Data Sharing Agreement.

g. Agencies that are denied access to HMIS by the Agency Access Working Group may request an appeal. The purpose of the appeal is to ensure the integrity of the review process for the agency's application. Appeals must be submitted to the HMIS Help

Desk.

    a. Upon receipt of the request, the HMIS Lead will complete the Agency Access Process Review, and determine whether the review process was followed appropriately. If all steps of the review process were followed, the decision by the Agency Access Working Group stands. If all steps in the review process were not followed, a sub-set of the Policies, Procedures, and Standards Commit ee will provide a secondary review and make a final determination regarding the agency's application. This decision cannot be appealed, but agencies denied access to HMIS may re-apply in the future if they can effectively address the reasons their initial application was denied.

h. The HMIS Access Ad Hoc and the HMIS Lead reserve the right to remove HMIS Access if the access is not being used to improve service provision for clients or contributing meaningful data to the Orange County CoC. Examples of unacceptable uses of HMIS include but are not limited to:

    a. Using HMIS data to monitor the whereabouts or service utilization of participants for purposes outside of housing-focused case management

    b. Using HMIS data outside of a business need

    c. Using data in HMIS as a reason to not serve a client that is not related to eligibility criteria (ie. substance use history, mental health issues, etc.)

    d. Sharing client identifying data with persons or groups that don't have access HMIS