

**ORANGE COUNTY CONTINUUM OF CARE
POLICIES, PROCEDURES AND STANDARDS COMMITTEE**

Tuesday, May 14, 2024

3:30 p.m. – 5:00 p.m.

Location:

County Administration South (CAS)

Multipurpose Rooms 103/105

601 N Ross St, Santa Ana, CA 92701

[Click Here](#) for parking information.

Virtual Meeting Option*:

Zoom Meeting Link: [Click here for meeting link](#)

Join by phone: +1 669 444 9171

Webinar ID: 920 8899 4328

****Listen-in option only***

Committee Chair: Nishtha Mohendra, Families Forward

Committee Members:

Judson Brown, City of Santa Ana

Andrew Crowe, Scholarship Prep

Becks Heyhoe, Orange County United Way

Melanie McQueen, PATH

Robert “Santa Bob” Morse, Individual

Maricela Rios-Faust, Human Options

Ami Rowland, Covenant House California

AGENDA

Welcome and Introductions – Nishtha Mohendra, 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. Public comments will be limited to three minutes. If there are more than five public speakers, this time will be reduced to two minutes.

To address the PPS Committee during the Public Comment period, members of the public are to complete a Request to Address the Committee form prior to the beginning of each agenda item and submit it to Continuum of Care (CoC) staff. Staff will call your name in the order received.

Members of the public may also submit public comment by emailing CareCoordination@ocgov.com. All comments submitted via email at least 24 hours before the start of the meeting will be distributed to the PPS Committee members and all comments will be added to the administrative records of the meeting. Please include “Policies, Procedures Standards Committee Meeting Comment” in the email subject line.

CONSENT CALENDAR

1. Approve the PPS Committee Meeting Minutes from February 13, 2024.
2. Approve the PPS Committee Meeting Minutes from April 9, 2024.

BUSINESS CALENDAR

1. **Orange County CoC Code of Conduct and Conflict of Interest Policy and Procedure Recommendations** – Felicia Boehringer, CoC Administrator, Sarah Jones, CoC Manager, Office of Care Coordination and CoC Code of Conduct Ad Hoc Membership
 - a. Approve the Orange County CoC Code of Conduct as recommended by the Code of Conduct Ad Hoc, to be recommended to the CoC Board for approval.
 - b. Approve the Orange County CoC Conflict of Interest Policy and Procedure as recommended by the Code of Conduct Ad Hoc, to be recommended to the CoC Board for approval.
 - c. Approve revisions to the Orange County CoC Governance Charter to incorporate the Orange County CoC Code of Conduct and the Orange County CoC Conflict of Interest Policy and Procedure, to be recommended to the CoC Board for approval.
2. **Coordinated Entry System (CES) Housing Assessment Recommendation** – Sarah Jones, CoC Manager, Office of Care Coordination
 - a. Approve updated CES Housing Assessment, including the addition of housing opportunity descriptions and accessibility questions, to be recommended to the CoC Board for approval.
3. **CoC Updates** – Sarah Jones, CoC Manager, Office of Care Coordination

Adjournment to: Regular meeting on June 11, 2024, 3:30 p.m. 5:00 p.m. in-person in the CAS Multipurpose Room 103/105 at 601 N. Ross St., Santa Ana, CA 92701

**ORANGE COUNTY CONTINUUM OF CARE (COC)
POLICIES, PROCEDURES AND STANDARDS COMMITTEE**

Tuesday, February 13, 2024

3:30 p.m. – 5:00 p.m.

Location:
Virtually on Teams
Meeting Link: [Click Here](#)
Meeting ID: 221 984 888 398
Passcode: j3ny59
Or call in (audio only): +1 949-543-0845
Phone Conference ID: 161 360 726#

Committee Chair: Dr. Shauntina Sorrells, Vice Chair of the CoC Board

Committee Members:

Judson Brown, City of Santa Ana
Andrew Crowe, Scholarship Prep
Becks Heyhoe, Orange County United Way
Nishtha Mohendra, Families Forward
Robert “Santa Bob” Morse, Individual
Maricela Rios-Faust, Human Options
Ami Rowland, Covenant House California

MINUTES

Welcome and Introductions – Dr. Shauntina Sorrells, Chair

1. Chair Dr. Shauntina Sorrells called the meeting to order at 3:31 p.m.
2. Roll Call
 - i. Present: Chair Dr. Shauntina Sorrells, Andrew Crowe, Becks Heyhoe, Nishtha Mohendra, Robert “Santa Bob” Morse, Maricela Rios-Faust and Ami Rowland
 - ii. Absent Excused: Judson Brown

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 agenda item presentation. 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

MINUTES

February 13, 2024

1. **Approve the PPS Committee Meeting Minutes from September 12, 2023.**
2. **Approve the PPS Committee Meeting Minutes from October 10, 2023.**
3. **Approve the PPS Committee Meeting Minutes from December 12, 2023.**

Robert “Santa Bob” Morse motioned to approve Consent Calendar, items 1 through 3. Becks Heyhoe seconded the motion. Andrew Crowe and Ami Rowland abstained from voting. Chair Dr. Shauntina Sorrells, Becks Heyhoe, Nishtha Mohendra, Robert “Santa Bob” Morse and Maricela Rios-Faust voted yes. Motion passed.

BUSINESS CALENDAR

1. **PPS Committee Charter Recommended Changes** – Sarah Jones, CoC Manager, Office of Care Coordination

Sarah Jones provided background on the PPS Committee Charter. At the January 17, 2024, meeting of the CoC Board, a request was made to revise the PPS Committee Charter to remove the requirement of the CoC Board Vice Chair to serve as PPS Committee Chair and to also expand the membership of the PPS Committee so that it is not exclusive to CoC Committee chairs, allowing for opportunities for other CoC Board and/or CoC General Members to participate. The Office of Care Coordination, as the Collaborative Applicant for the Orange County CoC, met with former PPS Committee Chair, Becks Heyhoe and current PPS Committee Chair, Dr. Shauntina Sorrells to discuss the recommended revisions to be presented at the PPS Committee in February 2024. It was determined to first propose revisions to the Chair and Vice Chair appointment procedures (Section 5), and to discuss desired membership for the PPS Committee at the meeting to allow time for additional input. Proposed revisions to the Vice Chair term are also being recommended to ensure consistency with other CoC Committee charters. If approved, the recommended changes will be presented to the CoC Board at the February 28, 2024, meeting for approval, noting additional discussion and revisions related to the PPS Committee membership will be forthcoming.

Sarah Jones further noted a request for the PPS Committee to discuss Section 6 of the PPS Committee Charter detailing Membership, to consider the expansion of membership beyond CoC Committee Chairs and include additional CoC Board members and CoC General Members.

PPS Committee Member Comments:

- Chair Dr. Shauntina Sorrells confirmed support for facilitating CoC Committee charter revisions, stating consistency throughout charters will be helpful. Chair Dr. Shauntina Sorrells also expressed that, based on feedback from the PPS Committee, it seems important to have PPS Committee members who can participate consistently and understand the vision and current initiatives occurring within the CoC Committees.
- Becks Heyhoe noted all CoC Committee charters need to be reviewed following the review and update of the Orange County CoC Governance Charter. Becks Heyhoe requested a consideration for each CoC Committee to appoint a representative to participate as a member of the PPS Committee, noting this would ensure CoC Committee support of designated, appointed representative.
- Nishtha Mohendra expressed support for each CoC Committee selecting a representative to serve on the PPS Committee, noting this would support diversifying voices represented in the decision-making process.
- Maricela Rios-Faust noted importance in being thoughtful about the PPS Committee membership’s connection to the CoC Board if it is recommended to include non-CoC Board members as part of the PPS Committee. Maricela Rios-Faust further stated importance of understanding desired membership

of CoC Committees that operate in an advisory to the CoC Board, versus membership for ad hocs or working groups, noting it would be helpful to further discuss at the next PPS Committee meeting.

Recommended Action: Approve recommended changes to PPS Committee Charter, especially Section 5 detailing Chair and Vice Chair and Section 6 detailing Membership, for approval to the CoC Board.

Maricela Rios-Faust motioned to approve the recommended action. Andrew Crowe seconded the motion. Chair Dr. Shauntina Sorrells, Andrew Crowe, Becks Heyhoe, Nishtha Mohendra, Robert “Santa Bob” Morse, Maricela Rios-Faust and Ami Rowland voted yes. Motion passed.

2. Homeless Management Information Systems (HMIS) Policies and Procedures Working Group Update – Erin DeRycke, Director, Data Analytics, 2-1-1 Orange County (211OC), Orange County United Way

Erin DeRycke provided an update on the annual review of the HMIS Policies and Procedures being completed by the HMIS Policies and Procedures Working Group (Working Group). 211OC leads the Working Group in completing an in-depth review of the HMIS Policies and Procedures and propose recommended changes to go to the CoC Board for review and approval. 211OC recruited the membership for the Working Group, which includes representatives from Last is First Philanthropies, PATH, Pathways of Hope, Salvation Army, U.S. Veterans Initiative, Families Forward, Family Assistance Ministries, Mental Health Association and Mercy House. The Working Group expects to meet five times from January through mid-March 2024. Additionally, the recommended changes from the Working Group will be shared with the HMIS Users feedback period and feedback and the Lived Experience Advisory Committee occurring in April 2024. Following this, a draft of the revised HMIS Policies and Procedures is expected to be shared with the PPS Committee for review and recommended action for the CoC Board to approve in May 2024. Erin DeRycke highlighted general feedback received from the Working Group to be considered within the recommended revisions. Erin DeRycke inquired whether the PPS Committee is aware of existing policies the Working Group should consider during the review process, as well as whether any new HMIS policies and procedures need to be developed and included in the HMIS Policies and Procedures.

PPS Committee Member Comments:

- Chair Dr. Shauntina Sorrells asked if representatives for agencies serving Transitional Age Youth were considered for the Working Group membership and recommended consideration for future Working Group membership to include representation of expertise related to subpopulations of people experiencing homelessness. Chair Dr. Shauntina Sorrells asked the Office of Care Coordination to review whether HMIS participating agencies are required to pay for HMIS and reason for requirement within HMIS Policies and Procedures. Additionally, Chair Dr. Shauntina Sorrells inquired whether a policy exists related to the transparency of data being reported publicly and requested consideration for 211OC to publish a schedule of each data report being posted publicly.
- Nishtha Mohendra asked whether the HMIS minimum participation requirements have been reviewed yet by the Working Group. Nishtha Mohendra noted that with the increase of participation of agencies in HMIS, it would be interesting to better understand how the HMIS minimum participation requirements impact the overall usage of HMIS in the Orange County CoC. Nishtha Mohendra also noted it would be beneficial to consider including a policy related to data quality and completeness.
- Ami Rowland asked about barriers to participating in HMIS, such as cost, noting the importance of reducing cost-related barriers specifically for providers serving youth, as more youth-specific data is needed, has been considered by the Working Group. Ami Rowland stated other CoCs do not require

agencies to pay for HMIS and feels a requirement by the Orange County CoC to pay for HMIS does not promote inclusivity. Ami Rowland noted the importance of considering strategies to share data more consistently.

- Maricela Rios-Faust requested clarity on the goal of the Working Group. Maricela Rios-Faust noted there have been several conversations over the years regarding HMIS user fees and how to incentivize data sharing and integration into HMIS from non-HMIS participating entities. Maricela Rios-Faust stated that receiving feedback on the current HMIS Policies and Procedures from the Working Group and larger CoC would be helpful in better understanding barriers to HMIS participation. Maricela Rios-Faust requested 211OC share the most recent proposed changes to the HMIS Policies and Procedures for the PPS Committee to review.

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

Sarah Jones provided the following CoC updates:

- **Fiscal Year (FY) 2023 CoC Program Award Announcement:** On, January 29, 2024, the U.S. Department of Housing and Urban Development (HUD) announced \$3.2 billion in FY 2023 CoC Competition Awards to approximately 7,000 local homeless housing and service programs across the United States and its territories. The Orange County CoC has been awarded \$34,301,133 for FY 2023. The funding represents 24 renewal projects, including the HMIS and Coordinated Entry System (CES) components, one new project awarded to Families Forward in the amount of \$615,485 created through reallocation and the CoC Planning Grant. The FY 2023 Orange County CoC Competition Award summary can be viewed [here](#).
- **FY 2024 CoC Program Registration:** The FY 2024 CoC Program Registration process officially opened on Tuesday, January 9, 2024, as announced by HUD, with a submission deadline of 5:00 p.m. on March 7, 2024. The Office of Care Coordination, as the Collaborative Applicant for the Orange County CoC, will complete and submit the registration by the deadline.
- **Youth Homelessness System Improvement (YHSI) Grant Notice of Funding Opportunity (NOFO):** HUD is making available \$50,000,000 in YHSI grant funding to support selected communities in either improving an existing response system for youth homelessness or establishing and implementing a new youth homelessness response system. Eligible funding categories under the YHSI grant funding include Planning and Partnerships, Data, Coordinated Entry and Racial and Gender Equity, with the per project award amount available ranging from \$200,000 - \$2,000,000. The CoC Board approved Orange County United Way as the Lead Applicant to submit an application for the YHSI NOFO for the Orange County CoC. The submission deadline for the YHSI NOFO is February 15, 2024.
- **Longitudinal Systems Analysis (LSA) Report:** The LSA report is produced utilizing HMIS data and submitted annually to HUD as part of the Annual Homeless Assessment Report (AHAR) to Congress. The LSA provides HUD and CoCs with critical information about how people experiencing homelessness use their system of care. The FY 2023 LSA reporting period occurred from October 1, 2022, through September 30, 2023. Orange County United Way as the HMIS Lead, worked with the Office of Care Coordination and successfully submitted the Orange County CoC's FY 2023 LSA data on January 23, 2024. The FY 2023 LSA Report will be presented to the CoC Board for review at a future meeting.
- **System Performance Measures (SPM) Report:** HUD requires CoCs to submit the SPM data on an annual basis, as an additional evaluation of a CoC's performance. The SPM Report analyzes

the performance of Safe Haven, Street Outreach, Emergency Shelter, Transitional Housing, and Permanent Housing (including Permanent Supportive Housing, Rapid Re-housing, and Other Permanent Housing) project types in the Orange County CoC that participate in HMIS. The SPM report is a summary and year-to-year comparison of system wide counts, averages, and medians related to seven areas of performance. The FY 2023 SPM reporting period occurred from October 1, 2022, through September 30, 2023. Orange County United Way, as the HMIS Lead, will work with the Office of Care Coordination to submit the Orange County CoC's FY 2023 SPM data prior to the March 13, 2024, deadline. The FY 2023 SPM Report will be presented to the CoC Board for review at a future meeting.

PPS Committee Member Comments:

- Becks Heyhoe provided an update on behalf of Orange County United Way that the YHSI NOFO application had been submitted. Becks Heyhoe shared details relating the collaborative community-wide engagement that supported the YHSI NOFO application process, including a young adult listening session, young adult survey respondents, YHSI listening sessions hosted by Orange County United Way and the Office of Care Coordination, and individual agency meetings.
- Andrew Crowe asked if the Orange County CoC receives feedback from HUD on the LSA and SPM reports.
- Robert "Santa Bob" Morse inquired about the process for recommending an ad hoc committee to evaluate whether a CoC Committee focused on older adults is needed, desired and able to be effective is created. Robert "Santa Bob" Morse stated consideration for bringing the recommendation to the Lived Experience Advisory Committee for consideration.
- Chair Dr. Shauntina Sorrells asked the Office of Care Coordination about formal definitions for CoC working groups and ad hocs within the CoC Board governance charter and requested the Office of Care Coordination support with sharing formal definitions at a future meeting.

Public Comments:

- Nadia Atalah stated that it would be beneficial to bring the topic of creating a CoC Committee for the older adult population to the CoC Board for discussion.

Adjournment to: Regular meeting on March 12, 2024.

**ORANGE COUNTY CONTINUUM OF CARE (COC)
POLICIES, PROCEDURES AND STANDARDS COMMITTEE**

Tuesday, April 9, 2024
3:30 p.m. – 5:00 p.m.



Committee Chair: Nishtha Mohendra, Families Forward

Committee Members:

Judson Brown, City of Santa Ana
Andrew Crowe, Scholarship Prep
Becks Heyhoe, Orange County United Way
Melanie McQueen, PATH
Robert “Santa Bob” Morse, Individual
Maricela Rios-Faust, Human Options
Ami Rowland, Covenant House California

MINUTES

Welcome and Introductions – Nishtha Mohendra, Chair

1. Sarah Jones called the meeting to order at 3:37 p.m.
2. Roll Call
 - i. Present: Chair Nishtha Mohendra, Robert “Santa Bob” Morse, Andrew Crowe, Maricela Rios-Faust
 - ii. Absent Excused: Becks Heyhoe, Melanie McQueen, and Ami Rowland
 - iii. Absent: Judson Brown
 - iv. Chair Nishtha Mohendra arrived at the meeting during Public Comments

Public Comments – Members of the public may address the 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 Committee. Comments will be limited to three minutes. If there are more than five public speakers, this time will be reduced to two minutes.

To address the Committee, members of the public are to complete a Request to Address the Committee form prior to the beginning of each agenda item and submit it to CoC staff. Staff will call your name in the order received.

Members of the public may also submit public comment by emailing CareCoordination@ocgov.com. All comments submitted via email at least 24 hours before the start of the meeting will be distributed to the Committee members and all comments will be added to the administrative records of the meeting. Please include "Policies, Procedures Standards Committee Meeting Comment" in the email subject line.

CONSENT CALENDAR

1. Approve the PPS Committee Meeting Minutes from February 13, 2024.

**Committee did not have quorum and minutes were not approved.*

BUSINESS CALENDAR

1. **Orange County CoC Code of Conduct and Conflict of Interest Policy and Procedure Recommendations** – Felicia Boehringer, CoC Administrator, Sarah Jones, CoC Manager, Office of Care Coordination and CoC Code of Conduct Ad Hoc Membership
 - a. Approve the Orange County CoC Code of Conduct as recommended by the Code of Conduct Ad Hoc, to be recommended to the CoC Board for approval.
 - b. Approve the Orange County CoC Conflict of Interest Policy and Procedure as recommended by the Code of Conduct Ad Hoc, to be recommended to the CoC Board for approval.
 - c. Approve revisions to the Orange County CoC Governance Charter to incorporate the Orange County CoC Code of Conduct and the Orange County CoC Conflict of Interest Policy and Procedure, to be recommended to the CoC Board for approval.

**As quorum was not met this agenda item was not presented to the committee and will be presented at the May 2024, PPS Committee meeting.*

2. **Orange County Homeless Management Information System (HMIS) User Fees Discussion** – Erin DeRycke, Director, Data Analytics, 2-1-1 Orange County, Orange County United Way and Sarah Jones, CoC Manager, Office of Care Coordination
 - a. Presentation on the current Orange County HMIS User Fee Policy and operational costs for HMIS.
 - b. Discussion on the current HMIS User Fee Policy and feedback on proposed changes to the HMIS Policies and Procedures

Erin DeRycke shared an update on the fees associated with the Orange County Homeless Management Information System (HMIS) Software. Bitfocus, the vendor for HMIS, charges fees per user and agency. Since FY18-19, there has been an 80% increase in the number of agencies participating in HMIS and a 212% increase in users. Recurring expenses have also risen by 158%. HMIS User Fees were approved by the CoC Board in December 2020 and agencies receiving state and/or federal funding will be charged for active licenses at the end of the year. Coordinated Entry Access Points will be charged an annual fee of \$200, regardless of HMIS participation. Agencies pay fees at the start of each calendar year.

PPS Committee Comments:

- Maricela Rios-Faust inquired about the percentage of agencies that are not obligated to participate. Maricela Rios-Faust inquired about whether HMIS is classified as an administrative or program cost. Maricela Rios-Faust inquired if it would be possible for Orange County United Way (OCUW) to allocate their CoC contract budget towards directly covering users instead of

billing the agencies. Maricela Rios-Faust asked if there were opportunities for funding from other sources, such as HHAP.

- Chair Nishtha Mohendra inquired regarding the contractual agreements between OCUW and the county, as well as the contractual arrangement with HUD. Chair Nishtha Mohendra asked whether there exists a need to fill any gaps between these two contracts. Chair Nishtha Mohendra questioned whether the added user fee in HMIS is deterring agencies from participation. Chair Nishtha Mohendra sought information regarding the strategies adopted by neighboring CoCs and suggested the exploration of alternative HMIS service providers, instead of relying on a specific one.
- Andrew Crowe reiterated that of the contract amount of \$360,000, only half of that is being recouped. Andrew Crowe inquired whether OCUW had to eliminate positions due to the costs associated with user fees, or if alternative funding sources were utilized. Andrew Crowe inquired whether ascending to a higher tier resulted in a reduction in pricing. Andrew Crowe queried whether altering the amount and charging the agency constituted the primary focus. Lastly, Andrew Crowe sought clarification on the potential impacts if agencies were charged higher fees.

3. CoC Board Governance Charter and Committee Charters – Sarah Jones, CoC Manager and Nishtha Mohendra, Chair

- a. Review and discuss PPS Committee membership composition
- b. Planning for CoC Board Governance Charter review
- c. Planning for CoC Committee Charters Review

Sarah Jones provided the following updates regarding the governance and committee charters:

- At a CoC Board meeting on January 17, 2024, a request was made to revise the Policies, Procedures and Standards (PPS) Committee Charter. The requirement for the CoC Board Vice Chair to serve as PPS Committee Chair was removed, and the PPS Committee membership was expanded to allow for other CoC Board and committee members to participate. The CoC Board approved these changes on February 28, 2024. Currently, the PPS Committee is discussing the expansion of membership, taking into account that there are eight committees in the CoC, and a strong connection between committee members and the CoC Board is desired. The PPS Committee cannot comprise a quorum of the CoC Board membership.
- The U.S. Department of Housing and Urban Development (HUD) requires each CoC to develop and annually review a governance charter that outlines the roles and responsibilities of the Board and committees. Orange County CoC has a Nominating Ad Hoc to support the annual review and election process. The Office of Care Coordination suggests further revisions to the governance charter in 2024 and plans to review all CoC Committee Charters. The CoC Board approved revisions to the governance charter that remove designated seats and emphasize equity and inclusion. The CoC Committee Charters will be reviewed after the governance charter is approved. CoC Committee Chairs are asked to engage members in reviewing and updating respective Charters.

PPS Committee Comments:

- Chair Nishtha Mohendra provided insights into the background of the agenda item. Chair Nishtha Mohendra spoke on the history of PPS Committee, underscoring its pivotal role within the CoC Board. Chair Nishtha Mohendra expressed reservations regarding the suitability of the committee for experimenting with new ideas. Chair Nishtha Mohendra advocated for more representation

on the committee, particularly of Native American individuals. Chair Nishtha Mohendra recommended the implementation of a Brown Act crash course. Chair Nishtha Mohendra sought clarification on the composition of ad hoc committees and the procedures of their formation.

- Andrew Crowe inquired about the capacity to accommodate additional members should there be an expansion of the committees. Andrew Crowe also sought clarification regarding the procedural timelines for each committee in reviewing its respective charter. Andrew Crowe inquired about the presence of Vice Chairs within each the CoC Committees. Andrew Crowe raised a query regarding the stipulations of the Brown Act pertaining to the presence of members within the jurisdiction or physical location for quorum establishment.
- Maricela Rios-Faust shared the necessity of diversifying the CoC committees and proposed a restructure of the composition of the committees. Maricela Rios-Faust advocated for the engagement of non-board members in ad hoc committees and emphasized the importance of promptly providing the minutes of ad hoc meetings to CoC Board members to ensure comprehensive transparency.
- Robert “Santa Bob” Morse expressed the need for a Vice Chair for the PPS Committee.

4. CoC Updates – Sarah Jones, CoC Manager, Office of Care Coordination

Sarah Jones provided the following CoC updates:

- **Homelessness Prevention and Stabilization Pilot Program Request for Proposals (RFP):** The Office of Care Coordination is seeking proposals from qualified organizations to provide a Homelessness Prevention and Stabilization Pilot (HPSP) Program. HPSP Program services will be provided countywide for eligible households made up of individuals or families at-risk of homelessness or experiencing a housing crisis and assist with short-term (no longer than 12-months) financial intervention and robust case management. The Office of Care Coordination is seeking programs that can be operationalized quickly and leverage additional funds to expand the reach and impact of the program upon the target population. Proposers are encouraged to read the description of the project and all related information carefully.
- **Development and Operations of a People with Lived Experience of Homelessness Financial Compensation Coordination Program Request for Information (RFI):** The Office of Care Coordination as the Collaborative Applicant and Administrative Entity of the Orange County CoC has issued a RFI for the Development and Operations of a People with Lived Experience of Homelessness Financial Compensation Coordination Program. The CoC is seeking meaningful engagement with people with current or former lived experience of homelessness, which can include partnering with the CoC as members of the CoC Board or committees, and other relevant CoC initiatives. The Office of Care Coordination is seeking a partnership to support in coordination of financial compensation, program operations and development. The RFI could result in a partnership with one or more respondents providing one or more of the requested program activities.

PPS Committee Comments:

- Maricela Rios-Faust expressed apprehension regarding the tight turnaround time for the Development and Operations of a People with Lived Experience of Homelessness Financial Compensation Coordination Program RFI, given the significant changes that have been made. Maricela Rios-Faust inquired if it would be possible to extend the due date for the RFI.

- Andrew Crowe asked if the County had received any submissions for the Homelessness Prevention and Stabilization Pilot Program Request for Proposals RFP.
- Chair Nishtha Mohendra inquired about the prominent feedback received regarding the Development and Operations of a People with Lived Experience of Homelessness Financial Compensation Coordination Program RFI and if that feedback was addressed in the RFI.
- Chair Nishtha Mohendra asked has there any feedback regarding how much compensation the individuals with lived experience would receive from the providers.

Adjournment to: Regular meeting on May 14, 2024, 3:30 p.m. 5:00 p.m. in-person in the County Administration South (CAS) Multipurpose Room 103/105 at 601 N. Ross St., Santa Ana, CA 92701.

Date: May 14, 2024

Subject: Orange County Continuum of Care (CoC) Code of Conduct and Conflict of Interest Policy and Procedure Recommendations

Recommended Action:

- a. Approve the Orange County CoC Code of Conduct as recommended by the Code of Conduct Ad Hoc, to be recommended to the CoC Board for approval.
- b. Approve the Orange County CoC Conflict of Interest Policy and Procedure as recommended by the Code of Conduct Ad Hoc, to be recommended to the CoC Board for approval.
- c. Approve revisions to the Orange County CoC Governance Charter to incorporate the Orange County CoC Code of Conduct and the Orange County CoC Conflict of Interest Policy and Procedure, to be recommended to the CoC Board for approval.

Background and Analysis

Code of Conduct

At the September 11, 2023, meeting, the CoC Board established the Code of Conduct Ad Hoc to develop and recommend code of conduct for the Orange County CoC Board and committee meetings, considering the Ralph M. Brown Act (Brown Act) and other local policies.

In accordance with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act requirements prescribed by the U.S. Department of Housing and Urban Development (HUD), the Orange County CoC Governance Charter (Charter) includes a code of conduct and recusal process for the CoC Board membership, its Chair(s) and any person acting on behalf of the CoC Board. Included in the code of conduct, the Charter notes “[CoC] Board members are expected to carry out the mandate of the Orange County CoC to the best of their ability and to maintain the highest standards of integrity while interacting with other members of the CoC Board, Orange County CoC representatives, service recipients, service providers, and the public.” However, prior to the annual review of the Charter, it was noted that the Charter does not include a code of conduct for CoC General members and public participating in meetings of the CoC. As such, there was an identified need to develop a code of conduct that would be applicable to attendees of CoC Board, committee, ad hoc and working group meetings. Additional legal implications were also to be considered regarding the Brown Act requirements and applicable State or County of Orange (County) policies relating to the facilitation of public meetings.

On October 23, 2023, the Code of Conduct Ad Hoc convened to discuss the current code of conduct policy included in Charter. The Code of Conduct Ad Hoc met four times from October through December 2023 and included participation from Ami Rowland, Maricela Rios-Faust, and Robert “Santa Bob” Morse. Upon initial review of the Charter’s code of conduct section, the Code of Conduct Ad Hoc proposed designing a format for an Orange County CoC Code of Conduct that could serve as a printed document to be referenced at meetings of the CoC. To support the vision of the Code of Conduct Ad Hoc members, the Office of Care Coordination saw the expansion of the code of conduct section could best be reflected in the form of an attachment to the Charter. The Code of Conduct Ad Hoc proposed a structure for the Orange County CoC

Code of Conduct that uplifted the core values found within the CoC Board Leadership Vision and Orange County Racial Equity Roadmap Final Brief produced by C4 Innovations, highlighting equity, dignity, and safety. The Code of Conduct Ad Hoc expressed the intention to expanding the applicability of the code of conduct section detailed in the Charter from CoC Board and committee members only, to be inclusive of CoC established ad hoc and working group members, Collaborative Applicant staff, CoC General Members and members of the public attending CoC meetings. The proposed Orange County CoC Code of Conduct includes language that is person-center and trauma-informed, such as ensuring communication styles that will meaningfully engage the public, providing meeting materials with accessibility in mind, creating safety and security within meeting spaces, and the commitment of orienting public to the process of how to share input and engage in meeting space.

In response to the direction of the CoC Board, the Office of Care Coordination also reviewed potential Brown Act and other State or County policies that would need to be reflected in the Orange County CoC Code of Conduct. Senate Bill (SB) 1100, which amends the Brown Act, was signed into law to provide clarification regarding the authority of a governing body to remove a disruptive member of the public from an open meeting. Under SB 1100, the presiding officer (i.e., CoC Board or committee Chair) must first warn an individual that their behavior is disruptive and that failure to halt their disruptive behavior could result in removal from the meeting. The Office of Care Coordination worked with the Code of Conduct Ad Hoc to ensure the Orange County CoC Code of Conduct includes a progressive response to violations, including disruptive behavior and/or verbal threats and/or physical threats of violence. Further, the Office of Care Coordination reviewed the Orange County CoC Code of Conduct and shared proposed revisions with the Code of Conduct Ad Hoc from December 2023 through March 2024. Minor changes to Charter, as detailed in **Attachment A**, are also being recommended, to show the expansion of the Charter's code of conduct section and include reference to the Orange County CoC Code of Conduct as an attachment to the Charter. A clean version of the Charter with proposed revisions can be referenced in **Attachment B**. The final proposed draft of the Orange County CoC Code of Conduct can be referenced in **Attachment C**.

Approval of the Orange County CoC Code of Conduct will provide clarity of guidelines and core values of all CoC meetings, while also ensuring that the CoC meetings provide safety and security for those in attendance.

[Conflict of Interest Policy and Procedure](#)

Through ongoing work with a HUD technical assistance coach, the Office of Care Coordination as the Collaborative Applicant for the CoC, received guidance that a more robust conflict of interest policy and procedure would be beneficial for the members of the CoC Board and committees. Section V.B.7 of the Charter currently describes the conflict of interest policy and recusal process for members of the CoC Board, however, there was no ongoing procedure for ensuring CoC Board and committee members were disclosing and documenting any conflicts of interest beyond self-disclosure within the meeting context.

At the September 11, 2023, special meeting of the CoC Board, a new recusal process was implemented utilizing guidance from the HUD technical assistance coach to ensure CoC Board members recuse themselves from discussion and voting on items for which they are conflicted. During a CoC Board planning meeting, the Office of Care Coordination and the CoC Board officers' considerations for creating a more robust conflict of interest policy and disclosure form for members of the CoC Board and committees, ad hocs, and working groups. **Attachment D** details the Orange County CoC Conflict of Interest Policy and Procedure created in partnership with the Code of Conduct Ad Hoc. Additionally, minor changes to the CoC

Governance Charter are being recommended to ensure consistency and include reference to the CoC Conflict of Interest Policy and Procedure as an attachment to the Governance Charter.

Approval of the Orange County CoC Conflict of Interest Policy and Procedure will create clear expectations for the CoC Board members and demonstrate the Orange County CoC's commitment to the highest standards of integrity, fairness, and conduct. Additionally, the Orange County CoC Conflict of Interest Policy and Procedure will ensure that the Orange County CoC remains compliant with HUD expectations and regulations.

Attachments

Attachment A – CoC Governance Charter Section V.B.7. – V.C. – Redline Version

Attachment B – CoC Governance Charter – Clean Version

Attachment C – Orange County CoC Code of Conduct

Attachment D – Orange County CoC Conflict of Interest Policy and Procedure

Orange County CoC - CA - 602 Governance Charter Section V.B.7 – V.C

B. Orange County CoC Board

7. ~~Continuum of Care CoC Board Conflict of Interest and Recusal Process Code of Conduct~~
~~Members must comply with the conflict of interest and recusal process found in~~
~~§578.95 Conflicts of interest in the HEARTH Act and any additional requirements~~
~~per the Continuum of Care Board Governance Charter.~~

1. Conflict of Interest – Members ~~serv~~ing on the CoC Board or any of ~~of the CoC~~
~~Board and any of~~ its committees, or subcommittees, ad hocs and/or and
working groups, shall abstain from voting on any issue in which they may be
personally vested to avoid a conflict of interest in accordance with County,
State and Federal laws, regulations and ordinances and shall refrain from
engaging in any behavior that conflicts with the best interest of ~~County~~the
CoC. Members must comply with the conflict of interest and recusal process
found in the § 578.95 Conflicts of interest of the Homeless–Emergency
Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act)¹ and any
additional requirements as outline in this the eCharter and the Orange County
CoC Conflict of Interest Policy and Procedure (Attachment A).

a. Members ~~of the CoC Board~~ shall not vote nor attempt to influence any
other ~~Board Mm~~ember on a matter under consideration by the CoC Board
or any of its committees, ad hocs or working groups or subcommittees, as
follows:

~~i.~~ Regarding the provision of services by such member (or by an entity
that such member represents); or

i.

~~ii.~~ By providing direct financial benefit to such member or the immediate
family of such member; or

ii.

iii. Engaging in any other activity determined by County, State or Federal
law, regulations and ordinances to constitute a conflict of interest.

b. Determining Whether a Conflict of Interest Exists – If a question arises as
to whether a conflict exists that may prevent a ~~member~~ Member from
voting, the CoC Board Chair ~~person~~ or designee may consult with
designated Collaborative Applicant staff ~~County Staff~~ to assist ~~them~~ in
making that determination.

¹ CFR 24 578.95 § 578.95 Conflicts of Interest: <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>

- c. Neither the CoC Board nor any of its ~~members~~ Members shall promote, directly or indirectly, any political party, political candidate or political activity using the name, emblem or any other identifier of the CoC Board.
 - d. No assets or assistance provided by ~~County~~ the Collaborative Applicant to the CoC Board shall be used for sectarian worship, instruction, or proselytization, except as otherwise permitted by law.
2. Code of Conduct – ~~The m~~ Members serving on of the CoC Board or any of its committees, ad hocs or working groups, are entrusted with specific responsibilities related to use of public funds invested in addressing homelessness. ~~Board~~ Members are expected to observe the highest standards of ethical conduct in the execution of these responsibilities. In the performance of their duties, ~~CoC Board~~ Members are expected to carry out the mandate of the Orange County CoC to the best of their ability and to maintain the highest standards of integrity while interacting with other ~~members~~ Members of the Board, Orange County CoC representatives, service recipients, service providers, and the public, as outlined in the Orange County CoC Code of Conduct (Attachment B).
- a. The Orange County CoC prohibits the solicitation and acceptance of gifts or gratuities by the CoC Board, ~~Ranking C~~ committees, ad hocs or working groups, Voting Members, or employees and agents of the Collaborative Applicant from anyone who intends to receive personal benefit or preferential treatment. Violation of any portion of this ~~code~~ Code of Conduct could subject a CoC Voting Member to immediate termination from membership as determined by the CoC Board;
 - b. The Orange County CoC promotes impartiality in performing official duties and prohibits any activity representing a conflict of interest. Individuals should not act on a matter if a reasonable person who knew the circumstances of the situation could legitimately question fairness;
 - c. ~~Officers, Voting Members and Committee Members shall~~ Members shall:
 - i. Put forth honest effort in the performance of their duties;
 - ii. Not knowingly make unauthorized commitments or promises of any kind purporting to bind the Orange County CoC without previous CoC Board approval;
 - iii. Disclose waste, fraud, abuse and corruption to the appropriate authorities;
 - iv. Adhere to all laws and regulations that provide equal opportunity to all United States citizens regardless of race, color, religion, sex, gender, sexual orientation, national origin, age, or disability, or any other protected category;

Item 1. Attachment A

- v. Conduct themselves with courtesy and respect. Personal relationships should not result in special considerations that influence the performance of their official duties in a manner contrary to the interest of the broader Orange County CoC. ~~CoC Board~~ Members ~~and Officers~~ are expected to exercise adequate control and supervision over matters for which they are individually responsible.
- vi. Assure that the resources entrusted to them are used for conducting official business only. Members ~~and Officers~~ of the CoC Board must abide by the Conflict of Interest Policies established for CoC Board operations (See Section V.B.7.1.).
- vii. Protect any confidential information provided to, or generated by, the activities of the Orange County CoC; and
- viii. Not use confidential information of the Orange County CoC for any purpose or disclose such confidential information to any third party, except as necessary to perform their duties and responsibilities as members of the CoC Board.

- 3. Termination Policy - Any ~~CoC Board~~ Member, or the entire CoC Board, may be removed for cause by a two-thirds (2/3) vote of the Orange County CoC Voting Membership at a specially called meeting. Cause is constituted by a violation of the ~~C~~onflict of ~~I~~nterest regulations or a violation of the Code of Conduct and ethics.

C. Orange County CoC General Membership

CoC General Membership is based upon organizations within the Geographic Area participating in the responsibilities of the Orange County CoC by having organizational representatives actively participate in CoC ~~board~~Board, committees, ad hocs and working groups.

As noted in § 578.5 Establishing the ~~Continuum of Care~~CoC. Relevant organizations will include:

~~nonprofit~~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 and homeless and formerly homeless individuals.”

Additionally, the Orange County CoC will strive to ensure representation from diverse and public agencies including those dedicated to behavior health; substance use recovery services; health; employment training and development; youth; the two-spirit, lesbian, gay, bisexual, trans, queer, questioning, intersex, asexual/aromantic and all other

sexual orientations and genders (2SLGBTQQA+) ~~LGBTQ~~ community, and housing and community development.

a. Nominations for Orange County CoC General Membership

A public invitation within the Geographic Areas of the CoC will be extended annually for new members to join in accordance with the HEARTH Act as described in § 578.7 Responsibilities of the ~~Continuum of Care~~ CoC.

b. General Membership Terms

There is no term limit. Membership, however, may be terminated by the Orange County CoC in accordance with subsection I. Removal below.

c. Continuum of Care Meetings

The Orange County CoC will hold meetings of the full membership with published agendas at least twice a year. The Orange County Service Provider Forum serves to facilitate CoC full membership meetings.

d. Quorum

A number equal to a majority of those belonging to the Orange County CoC will constitute a quorum for the transaction of business at any general membership meeting.

e. Voting

At all meetings, business items may be decided by arriving at a consensus. If a vote is necessary, all votes will be by voice or ballot at the will of the majority in attendance. The exception to this rule is a vote to elect ~~CoC Board members~~ Members, in this case a vote will be held by secret ballot. Each active organization will have one vote given by one representative even when more than one organizational representative is present. No active organization may vote on any item which presents a real or perceived conflict-of-interest.

f. Conflict of Interest

CoC General Members must comply with the conflict of interest and recusal process found in the § 578.95 Conflicts of interest of ~~the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009~~ (HEARTH Act)² and any additional requirements as outline in this charter ~~the Charter and the Orange County CoC Conflict of Interest Policy and Procedure (Attachment A).~~

~~“(a) Procurement. For the procurement of property (goods, supplies, or equipment) and services, the recipient and its subrecipients must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) and 24 CFR 84.42 (for private nonprofit organizations).~~

² CFR 24 578.95 § 578.95 Conflicts of Interest: <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>

~~(b) Continuum of Care board members. No Continuum of Care board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.~~

~~(c) Organizational conflict. An organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, the recipient or subrecipient is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance under this part, or when a covered person's, as in paragraph (d)(1) of this section, objectivity in performing work with respect to any activity assisted under this part is or might be otherwise impaired. Such an organizational conflict would arise when a board member of an applicant participates in decision of the applicant concerning the award of a grant, or provision of other financial benefits, to the organization that such member represents. It would also arise when an employee of a recipient or subrecipient participates in making rent reasonableness determinations under § 578.49(b)(2) and § 578.51(g) and housing quality inspections of property under § 578.75(b) that the recipient, subrecipient, or related entity owns.~~

~~(d) Other conflicts. For all other transactions and activities, the following restrictions apply:~~

~~(1) No covered person, meaning a person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients and who exercises or has exercised any functions or responsibilities with respect to activities assisted under this part, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under this part, may obtain a financial interest or benefit from an assisted activity, have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity, or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or during the one-year period following his or her tenure.~~

~~(2) Exceptions. Upon the written request of the recipient, HUD may grant an exception to the provisions of this section on a case-by-case basis, taking into account the cumulative effects of the criteria in paragraph (d)(2)(ii) of this section, provided that the recipient has satisfactorily met the threshold requirements of paragraph (d)(2)(ii) of this section.~~

~~(i) Threshold requirements. HUD will consider an exception only after the recipient has provided the following documentation:~~

~~(A) Disclosure of the nature of the conflict, accompanied by a written assurance, if the recipient is a government, that there has been public disclosure of the conflict and a description of how the public disclosure was made; and if~~

~~the recipient is a private nonprofit organization, that the conflict has been disclosed in accordance with their written code of conduct or other conflict of interest policy; and~~

~~(B) An opinion of the recipient's attorney that the interest for which the exception is sought would not violate State or local law, or if the subrecipient is a private nonprofit organization, the exception would not violate the organization's internal policies.~~

~~(ii) Factors to be considered for exceptions. In determining whether to grant a requested exception after the recipient has satisfactorily met the threshold requirements under paragraph (c)(3)(i) of this section, HUD must conclude that the exception will serve to further the purposes of the Continuum of Care program and the effective and efficient administration of the recipient's or subrecipient's project, taking into account the cumulative effect of the following factors, as applicable:~~

~~(A) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;~~

~~(B) Whether an opportunity was provided for open competitive bidding or negotiation;~~

~~(C) Whether the affected person has withdrawn from his or her functions, responsibilities, or the decision-making process with respect to the specific activity in question;~~

~~(D) Whether the interest or benefit was present before the affected person was in the position described in paragraph (c)(1) of this section;~~

~~(E) Whether undue hardship will result to the recipient, the subrecipient, or the person affected, when weighed against the public interest served by avoiding the prohibited conflict;~~

~~(F) Whether the person affected is a member of a group or class of persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class; and~~

~~(G) Any other relevant considerations.~~

g. Code of Conduct

Members will ensure a commitment to the Orange County CoC Code of Conduct (Attachment B).

g.h. Removal

Item 1. Attachment A

Any ~~member~~ CoC General Member of the Orange County CoC may be removed by a two-thirds majority of all organizations present during a scheduled meeting.

Orange County CoC - CA - 602 Governance Charter

Table of Contents

I. Name	2
II. Geographic Boundaries	2
III. Purpose	2
IV. Responsibilities of the Orange County CoC	3
A: Operating the Continuum of Care	3
B: Designating and Operating HMIS	4
C: Continuum of Care Policies, Procedures and Standards	4
D: Continuum of Care Planning.....	5
E: Annual Competitive Application for CoC Funding.....	6
V. Orange County CoC Structure	6
A. CoC Collaborative Applicant and Fiscal Agent	6
B. Orange County CoC Board	7
C. Orange County CoC General Membership	15
D. Collaboration with Commission To End Homelessness.....	17
VI. Continuum of Care Legal Entity	18
VII. Public Statement and Media Policy	18

Introduction: In accordance with the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (the “HEARTH Act”) which was enacted into law on May 20, 2009, the Orange County Continuum of Care in consultation with the Collaborative Applicant (County of Orange), Continuum of Care and Emergency Solution Grant funded agencies and Homeless Management Information System (“HMIS”) Lead Agency has developed a governance charter which includes procedures and policies needed to comply with the HEARTH Act requirements as prescribed by U.S. Department of Housing and Urban Development (HUD); and a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board.

In addition to HEARTH Act compliance and in alignment with the Regional System of Care, the Continuum of Care (“CoC”) will operate to enhance, inform and implement services addressing the complex case management and housing needs of individuals and families experiencing homelessness in Orange County. Services supported by the Orange County CoC will also demonstrate best practices and evidence-based practices ensuring a client-centered approach, client choice and client rights and responsibilities are clear and service standards are consistently met.

The Orange County CoC designates the County of Orange as the collaborative applicant and fiscal entity for administering planning and funding for homelessness assistance program throughout the Orange County CoC.

I. Name:

The technical name of the organization is CoC CA-602 hereinafter referred to as the “Orange County CoC”.

II. Geographic Boundaries:

The Orange County CoC covers all the geography within the boundaries of Orange County, including its 34 cities and unincorporated areas as regionalized within North, Central and South Service Planning Areas.

III. Purpose:

The Orange County CoC serves as the locally-designated primary decision-making group whose purpose and scope is to implement the Continuum of Care program (the “CoC”) which is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11381-11389). As noted in CFR 24 Part 578.1 Purpose and scope of the HEARTH Act, the program is designed to:

- A. Promote communitywide commitment to the goal of ending homelessness through regional coordination and collaboration;
- B. Advocate for funding and resources to end homelessness and provide funding for proven efforts by nonprofit providers and local governments to quickly rehouse people experiencing homelessness, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;
- C. Promote access to and effective utilization of mainstream programs by homeless individuals and families; and

- D. Promote implementation of best practices and evidence-based approaches to homeless programming and services.

IV. Responsibilities of the Orange County CoC

The four major responsibilities of the Orange County CoC consists of:

- 1. Operating the Continuum of Care,
- 2. Designating and operating an HMIS for the Continuum of Care,
- 3. Planning for the Continuum of Care, and
- 4. Preparing an application for funds which is in accordance with § 578.7 Responsibilities of the Continuum of Care and in the HEARTH Act and § 578.79.

A. Operating the Continuum of Care.

The Orange County CoC will:

- 1. Hold meetings of the full membership, with published agendas, at least semi-annually;
- 2. Make a public invitation for new members to join available within the geographic area at least annually;
- 3. Adopt and follow a written process to select a board to act on behalf of the CoC. The process must be reviewed, updated, and approved by the CoC at least every five (5) years;
- 4. Establish committees, subcommittees and ad hoc groups to address specific functions of the Orange County CoC, as needed;
- 5. Work with the Collaborative Applicant to develop and update annually a governance charter, which will include all procedures and policies needed to comply with HUD mandates, HEARTH Act regulations and a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board;
- 6. Consult with recipients and subrecipients to establish performance targets appropriate for population and program type, monitor Continuum of Care and Emergency Solutions Grant funded agencies performance, evaluate outcomes, and take action to address poor performers;
- 7. Evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program, and report performance measures to HUD as required;
- 8. In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and operate a Coordinated Entry System that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. The CoC must maintain specific policy to guide the operation of the Coordinated Entry System on how its system addresses the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from nonvictim service providers in compliance with any requirements established by HUD Notice; and

Item 1. Attachment B

9. In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:
 - a. Policies and procedures for evaluating individuals' and families' eligibility for assistance;
 - b. Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
 - c. Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;
 - d. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;
 - e. Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and
 - f. Where the CoC is designated a high-performing community, as described in Subpart G, policies and procedures set forth in 24 CFR 576.400(e)(vi), (e)(vii), (e)(viii), and (e)(ix).

B. Designating and operating a Homeless Management Information System.

The Orange County CoC will:

1. Designate a single Homeless Management Information System (HMIS) for the geographic area;
2. Designate an eligible applicant to manage the CoC's HMIS, which will be known as the HMIS Lead;
3. Review, revise and approve a privacy plan, security plan, and data quality plan for the CoC HMIS;
4. Ensure consistent participation of recipients and subrecipients in the HMIS;
5. Ensure the HMIS is administered in compliance with requirements prescribed by HUD;
6. Ensure the HMIS operates efficiently and effectively to promote HUD funded and non-funded agency participation, system coordination, and utilization and performance is achieved; and
7. Ensure that HMIS captures the Coordinated Entry System Core Elements of Access, Assessment, Prioritization and Referral through program participation by recipients and subrecipients.

C. Continuum of Care Policies, Procedures and Standards

The Orange County CoC will:

1. Have a Policies, Procedures and Standards Committee that meets at least two times a year or as needed for the review of policies, procedures and standards of the Orange County Continuum of Care;

Item 1. Attachment B

2. Have its various committees, subcommittees, and ad hocs proposed drafts, revisions and/or updates to policies, procedures and/ or standards be submitted to the Policies, Procedures and Standards Committee;
3. Have all proposed policies, procedures and standards reviewed and vetted by the Policies and Standards Committee to ensure adherence to the HEARTH Act, HUD Notices and regulations, best practices and evidenced-based approaches, prior to being presented to the CoC Board for adoption; and
4. Engage the public, including homeless and formerly homeless individuals, in policy and standards development and/or revisions that affect the operations of the CoC and ESG funded programs.

D. Continuum of Care Planning.

The Orange County CoC and the Collaborative Applicant (County of Orange) will develop a plan that includes:

1. Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals, including unaccompanied youth, and families. At a minimum, this system encompasses the following:
 - a. Outreach, engagement, and assessment;
 - b. Shelter, housing, and supportive services;
 - c. Prevention and diversion strategies.
2. Planning for and conducting an annual shelter homeless count and a biennial unsheltered homeless count by Service Planning Area that meets the following requirements:
 - a. Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons;
 - b. Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons; and
 - c. Other requirements established by HUD Notice or to meet local objectives.
3. The HMIS Lead Agency will assist the Collaborative Applicant in conducting an annual gaps analysis of the homeless needs and services available within the geographic area and/or Service Planning Areas;
4. Providing information required to complete the Consolidated Plan(s) within the CoC's geographic area;
5. Consulting with State and local government Emergency Solutions Grants program recipients within the CoC's geographic area on the plan for allocating Emergency Solutions Grants program funds and reporting on and evaluating the performance of

Item 1. Attachment B

Emergency Solutions Grants program recipients and subrecipients. Emergency Solutions Grant entitlements include:

- County of Orange
- Santa Ana
- Anaheim
- Garden Grove

E. Annual Competitive Application for Continuum of Care Funding

The Orange County CoC will:

1. Design, operate, and follow a collaborative process for the development of applications and approve the submission of applications in response to a Notice of Funding Availability (NOFA) published by HUD;
2. Establish priorities for funding proposals to meet needs within in the geographic area;
3. Support the Collaborative Applicant in compiling the required application information from all projects within the geographic area that the CoC has selected for funding; and
4. Retains all of its responsibilities, even if it designates one or more eligible applicants other than itself to apply for funds on behalf of the CoC. This includes approving the CoC application.

V. Orange County CoC Structure:

The operations and management of the Orange County CoC and its responsibilities are structured in four segments.

A. CoC Collaborative Applicant and Fiscal Agent

The Orange County CoC designates the County of Orange as Collaborative Applicant and Planning Grant recipient for homelessness assistance programs throughout the Orange County CoC. The County of Orange will comply with the provisions of 24 CFR 578.7, including coordinating with the development of the CoC system, CoC planning, Coordinated Entry System, HMIS and the support of the various functions and activities as required by the HEARTH Act.

In addition, the Orange County CoC Board designates the County of Orange as administrative and fiscal entity for homeless funding to support the development of the System of Care. The County of Orange is the administrative and fiscal entity for state and local funding from homeless programming that designates the CoC as the eligible applicant and requires the local government entity to be the fiscal agent.

B. Orange County CoC Board

As noted in §578.5(b) of the HEARTH Act, “The Continuum of Care must establish a board to act on behalf of the Continuum using the process established as a requirement by § 578.7(a)(3) and must comply with the conflict-of-interest requirements at § 578.95(b).”

The Continuum of Care Board is therefore acting on behalf of the members of the Orange County CoC. To this end, the Orange County CoC will strategically comprise a governing board that represents the stakeholder groups enumerated in the HEARTH Act which require the CoC Board to be representative of relevant organizations and of projects serving homeless subpopulations within Orange County, including at least one (1) homeless or formerly homeless individual.

1. Continuum of Care Board Responsibilities

The Continuum of Care Board will:

- a. Conduct the hands-on work and facilitate the committees, subcommittees and ad hoc groups of the Orange County CoC. Every member of the CoC Board must serve on a minimum of one committee;
- b. Build community awareness of the needs of all homeless and at-risk populations identified in the county;
- c. Ensure, to the greatest extent possible, access to services by the subpopulations enumerated in this charter;
- d. Ensure relevant organizations and projects serving various homeless and at risk subpopulations are represented in the planning and decision-making for the overall coordination of homeless services Continuum of Care;
- e. Ensure Regional Coordination and collaborative work across the CoC through the use of the Coordinated Entry System;
- f. Coordinate the CoC Programs and set goals and priorities for ending homelessness in Orange County;
- g. Approve Orange County CoC policies as recommended by service providers and/or Committees;
- h. Create committees, subcommittees and ad hoc groups necessary for the proper and efficient functioning of the Orange County CoC, including the CoC program Notice of Funding Opportunity (NOFO); and
- i. Dissolve committees, subcommittees and ad hoc groups, if they are determined to be unnecessary for the proper and efficient functioning of the Orange County CoC.

2. Continuum of Care Board Composition

The CoC Board is comprised of an odd number of members, between seventeen (17) to twenty-one (21) members in total, who are elected by the voting General Membership. A quorum consists of fifty percent (50%) plus one (+1) voting members present. The CoC Board shall be comprised of members that provide a well-balanced perspective with multiple identities, experiences, and backgrounds to best lead the response to homelessness in the Orange County CoC.

The CoC Board designations are:

- a. The CoC Board includes three (3) Officers, who shall be elected by the CoC Board each year. These positions include:
 - i. Chair: Responsible for leading the monthly CoC Board meetings and facilitating the work of the Orange County CoC, as determined in this Charter.
 - ii. Vice-Chair: Responsible for chairing CoC Board meetings in the absence of Chair or when Chair must recuse themselves
 - iii. Secretary: Responsible for tracking attendance and motions for CoC Board meetings, reviewing the draft CoC Board meeting minutes, and chairing CoC Board meetings in the absence of both the Chair and Vice Chair, or when Chair and Vice Chair must recuse themselves

- b. The CoC Board shall have an odd number of members with seventeen (17) to twenty-one (21) total CoC Board member seats in any given year. By January 2025, the makeup of the CoC Board shall include at least the following number of people with each of these identities, experiences, and backgrounds. One person may represent more than one of these identities, experiences, and backgrounds.
 - i. People who have experienced homelessness or housing instability. By January 2025, at least 30% of the CoC Board must be comprised of people with lived experience, though the CoC Board can prioritize including more in any given year. In January 2024, the Board must include at least 4 people with lived experience. This includes:
 1. One (1) seat will be determined by the Lived Experience Advisory Committee (LEAC). This could be the LEAC chair or someone else.
 2. It is important to the CoC Board that people with lived experience represent an array of household and age makeups. However, because some people with lived experience may not want to disclose that experience publicly, there are no required seats for people from specific household types or age groups. Ideally, the Board is recommended but not required to include at least one person from each of the following groups:
 - a. Lived experience of homelessness as a Transitional Age Youth (TAY) in the last 5 years
 - b. Lived experience of homelessness as a single adult
 - c. Lived experience of homelessness with their family

- d. Lived experience of homelessness as an older adult
- ii. People with identities and experiences that reflect the diversity of the CoC. By January 2025, the CoC Board must include at least the following number of people with each of the following identities or experiences. This includes Board members who have and have not experienced homelessness:
 1. Black [at least two (2)]
 2. Indigenous or Native American [at least two (2)]
 3. Person of Color (including but not limited to people who are: Asian, Asian-American, Pacific Islander, Native Hawaiian, Latino/a/e/x, Central American, South American, Caribbean, Middle Eastern, North African) [at least three (3)]
 4. LGBTQIA+ [at least two (2)], including at least one (1) person who identifies as LGBTQIA+ based on their:
 - a. Sexual orientation: Lesbian, gay, bi, queer+
 - b. Gender identity: Trans, non-binary, intersex, non-conforming+
 5. Disabled and/or neurodivergent [at least two (2)]
 6. Veteran/military service experience or part of a veteran/military service family [at least one (1)]
 7. Experience of domestic violence/intimate partner violence [at least one (1)]
 8. Older adult [at least one (1)]
- iii. People with personal or professional experience with:
 1. Veteran/military service-focused agency [at least one (1)]
 2. Emergency Solutions Grant (ESG) Program funded agency or recipient agency [at least one (1)]
 3. Public Housing Agency (PHA) [at least one (1)]
 4. Domestic violence agency [at least one (1)]
 5. Education field / McKinney-Vento liaison [at least one (1)]
 6. Behavioral health field [at least one (1)]
 7. Faith-based organization or community [at least one (1)]
 8. Health care field [at least one (1)]
 9. Affordable housing development background [at least one (1)]
 10. People with experience with the following parts of the system. Ideally, the CoC Board will include members who represent all parts of the system, but at minimum the CoC Board must include members who represent at least three (3) of the following:
 - a. Diversion
 - b. Street Outreach
 - c. Prevention
 - d. Emergency Shelter
 - e. Rapid Rehousing
 - f. Permanent Supportive Housing

- g. TAY Agency
- h. Family Agency

c. Continuum of Care Board Support

- i. Collaborative Applicant – As the Collaborative Applicant the Continuum of Care Manager and/or other County of Orange staff will facilitate the Continuum of Care Board business and will utilize resources to continue the development of the CoC system.
- ii. HMIS Lead Agency – The HMIS Lead Agency will assist the Collaborative Applicant in providing CoC utilization, performance and gaps data and regional Service Planning Area resource information to the CoC Board.
- iii. Coordinated Entry System Lead Agency – The Coordinated Entry System Lead Agency will assist the Collaborative Applicant in providing performance and gaps data information to the CoC Board.

3. Continuum of Care Board Selection Process

In advance of each term expiration, the following steps are to be completed to select new CoC Board Members:

- a. A Nominating Ad Hoc of at least six (6) people will be appointed annually by the CoC Board Chair.
 - i. At least one (1) member of the Nominating Ad Hoc will be a CoC Board member whose seat is not up for election.
 - ii. At least one (1) member of the Nominating Ad Hoc will be a Voting General Member or represent an organization that has a Voting General Member.
 - iii. At least four (4) members of the Nominating Ad Hoc will not be current CoC Board members.
- b. The Nominating Ad Hoc will review the CoC Governance Charter (Charter) and make any proposed revisions needed to ensure the CoC Board composition, selection process, and qualifications align with the community's priorities and the identities, background, and experiences of key partners, including people with lived experience, in the community. The Nominating Ad Hoc will review the most recently available data to provide due diligence to ensure that the CoC Board membership identity, background, and experience recommendations align with current trends in who experiences homelessness in Orange County. The recommended Charter changes will go to the CoC Board for approval. Should the CoC Board provide feedback or recommendations to the proposed changes, the Nominating Ad Hoc will review feedback and incorporate the CoC Board recommendations into the Charter to inform the nomination and election process. In the event that the Nominating Ad Hoc is not in agreement with the CoC Board feedback and recommendations to the Charter, the Nominating Ad Hoc will submit a new version of the Charter for the CoC Board to review and approve before the rest of the CoC Board nomination and election process moves forward.
- c. The Nominating Ad Hoc will support the Collaborative Applicant in outreach to potential CoC Board candidates to make them aware of the upcoming CoC Board

election. These outreach efforts will help ensure adequate representation of identities, backgrounds, and experiences listed in the CoC Board composition.

- d. The Voting General Membership will be notified of the nomination period, start and end, as well as the process to nominate a candidate or express interest in being a candidate.
- e. The Nominating Ad Hoc will support the Collaborative Applicant in reviewing submitted applications and verifying qualifications and identities, background, and experience of all candidates who apply to serve as CoC Board Members or Officers. The Nominating Ad Hoc will interview all applicants who appear to meet minimum qualifications and refer all applicants whom they verify to meet minimum qualifications to the CoC General Membership as qualified candidates.
- f. The CoC General Membership will vote by secret ballot on the slate of qualified candidates. The Nominating Ad Hoc will utilize a prioritization tool that identifies candidates with the highest votes and ensures desired representation of various identities, experiences, and backgrounds for the CoC Board membership. The selected candidates will be presented to the CoC Board for ratification.
- g. The Lived Experience Advisory Committee (LEAC) will select one person to represent them on the CoC Board. The CoC General Membership will not vote on this person's participation on the CoC Board.
- h. The same process as outlined above in items a. through f. will be completed to fill any vacancies left by a member before the expiration of the term of that member, should the designated CoC Board composition require their seat to be filled. Appointments made to fill a vacancy left by a member before the expiration of the term of that member shall be for the remaining term of that member.
- i. The traditional nominating and election timeline is as follows:
 - i. August/September – CoC Board Chair appoints Nominating Ad Hoc
 - ii. September/October – Nominating Ad Hoc convenes to review and update sections of the Charter that pertain to the CoC Board composition, selection process, and qualifications
 - iii. October/November – Nominating Ad Hoc outreaches to potential CoC Board candidates. The Nominating Ad Hoc will interview eligible CoC Board candidates who meet criteria.
 - iv. November/December – Candidates who moved forward based on their interview are presented to the CoC General Membership for voting/election.
 - v. December – CoC Board ratifies slate of elected candidates by the CoC General membership.
 - vi. January – CoC Board seating takes place. Outgoing CoC Board and Board staff will provide training and orientation for incoming CoC Board.
- j. At the first meeting of the calendar year, the CoC Board will elect the Board Officers (Chair, Vice-Chair and Secretary) to serve for one-year (1) terms. CoC Board Officers may serve for more than one (1) term.

4. Continuum of Care Board Qualifications

All CoC Board members must bring a commitment to the work to end homelessness using best practices adopted locally. CoC Board members with lived experience of homelessness who are not also representing a local organization will be compensated for their time and expertise using the CoC's current compensation methods and rates.

1. The Orange CoC Board Members and Officers are selected to represent various identities and personal and professional backgrounds, experiences, and entities.

As a whole, the Board should:

- i. Be diverse and reflect the identities, backgrounds, and experiences of people who experience homelessness in Orange County;
 - ii. Have complementary skill sets;
 - iii. Represent a balance of community partners in the region; and
 - iv. Willingness to collaborate with other potential CoC Board Members and bring in new leaders.
- b. Potential and current CoC Board Members must be current voting General Members who demonstrate:
 - i. A high level of ethical behavior, including compliance with the Conflict of Interest and Recusal process as defined in this Charter;
 - ii. Working knowledge of, compassion about, and commitment to:
 1. ending homelessness
 2. furthering equity and inclusion within the CoC Board and across the CoC's work.
 - iii. Leadership and collaborative spirit in the best interest of the Orange County CoC.
 - iv. Willingness and ability to consistently attend meetings and participate in Committees.
 - c. All CoC Board members must attend at least seventy-five percent (75%) of meetings each year and not be absent for three (3) consecutive meetings in order to remain in good standing. All CoC Board members must also participate in at least one (1) committee, working group, or ad-hoc, and attend at least seventy-five percent (75%) of committee meetings. Board Members and Officers failing to meet the attendance standard will be subject to removal by majority vote fifty percent plus one (50% + 1) of the CoC Board.

5. Continuum of Care Board Meetings

1. All meetings will be open to the public except as otherwise determined by the CoC Board. Any person who attends an Orange County CoC meeting may be asked by the CoC Board Chair to leave if the person is disruptive; if a conflict of interest applies; or if an agenda business item(s) is deemed by the CoC Board Chair to be of such nature that it involves only Orange County CoC closed session business.

2. Robert's Rules of Order Abridged-Revised will guide the process during all meetings.
 3. An annual calendar of the CoC Board meetings will be recommended to the CoC Board for adoption at the CoC Board meeting in October and presented at the Service Provider Forum meeting in November. The CoC Board meetings calendar will be distributed to all members electronically and published on the County of Orange – Homeless Services website.
6. Continuum of Care Board Documentation
1. The Orange County CoC Board will conduct and transact business in a fair and transparent manner. To this end, the CoC Board will maintain records of all Orange County Continuum of Care agendas and minutes and make these available upon request.
 2. The Collaborative Applicant will keep record of all HEARTH Act policies, calendars, meeting minutes, and records.
7. CoC Board Conflict of Interest and Code of Conduct
1. Conflict of Interest – Members serving on the CoC Board or any of its committees, ad hocs and/or working groups, shall abstain from voting on any issue in which they may be personally vested to avoid a conflict of interest in accordance with County, State and Federal laws, regulations and ordinances and shall refrain from engaging in any behavior that conflicts with the best interest of the CoC. Members must comply with the conflict of interest and recusal process found in the § 578.95 Conflicts of interest of the HEARTH Act¹ and any additional requirements as outline in the Charter and the Orange County CoC Conflict of Interest Policy and Procedure (Attachment A).
 - a. Members shall not vote nor attempt to influence any other Member on a matter under consideration by the CoC Board or any of its committees, ad hocs or working groups as follows:
 - i. Regarding the provision of services by such member (or by an entity that such member represents); or
 - ii. By providing direct financial benefit to such member or the immediate family of such member; or
 - iii. Engaging in any other activity determined by County, State or Federal law, regulations and ordinances to constitute a conflict of interest.
 - b. Determining Whether a Conflict of Interest Exists – If a question arises as to whether a conflict exists that may prevent a Member from voting, the

¹ CFR 24 578.95 § 578.95 Conflicts of Interest: <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>

CoC Board Chair or designee may consult with designated Collaborative Applicant staff to assist in making that determination.

- c. Neither the CoC Board nor any of its Members shall promote, directly or indirectly, any political party, political candidate or political activity using the name, emblem or any other identifier of the CoC Board.
 - d. No assets or assistance provided by the Collaborative Applicant to the CoC Board shall be used for sectarian worship, instruction, or proselytization, except as otherwise permitted by law.
2. Code of Conduct – Members serving on the CoC Board or any of its committees, ad hocs or working groups, are entrusted with specific responsibilities related to use of public funds invested in addressing homelessness. Members are expected to observe the highest standards of ethical conduct in the execution of these responsibilities. In the performance of their duties, Members are expected to carry out the mandate of the Orange County CoC to the best of their ability and to maintain the highest standards of integrity while interacting with other Members, Orange County CoC representatives, service recipients, service providers, and the public, as outlined in the Orange County CoC Code of Conduct (Attachment B).
- a. The Orange County CoC prohibits the solicitation and acceptance of gifts or gratuities by the CoC Board, committees, ad hocs or working groups, Voting Members, or employees and agents of the Collaborative Applicant from anyone who intends to receive personal benefit or preferential treatment. Violation of any portion of this Code of Conduct could subject a CoC Voting Member to immediate termination from membership as determined by the CoC Board;
 - b. The Orange County CoC promotes impartiality in performing official duties and prohibits any activity representing a conflict of interest. Individuals should not act on a matter if a reasonable person who knew the circumstances of the situation could legitimately question fairness;
 - c. Members shall:
 - i. Put forth honest effort in the performance of their duties;
 - ii. Not knowingly make unauthorized commitments or promises of any kind purporting to bind the Orange County CoC without previous CoC Board approval;
 - iii. Disclose waste, fraud, abuse and corruption to the appropriate authorities;
 - iv. Adhere to all laws and regulations that provide equal opportunity to all United States citizens regardless of race, color, religion, sex, gender,

sexual orientation, national origin, age, or disability, or any other protected category;

- v. Conduct themselves with courtesy and respect. Personal relationships should not result in special considerations that influence the performance of their official duties in a manner contrary to the interest of the broader Orange County CoC. Members are expected to exercise adequate control and supervision over matters for which they are individually responsible.
 - vi. Assure that the resources entrusted to them are used for conducting official business only. Members of the CoC Board must abide by the Conflict of Interest Policies established for CoC Board operations (See Section V.B.7.1.).
 - vii. Protect any confidential information provided to, or generated by, the activities of the Orange County CoC; and
 - viii. Not use confidential information of the Orange County CoC for any purpose or disclose such confidential information to any third party, except as necessary to perform their duties and responsibilities as members of the CoC Board.
3. Termination Policy - Any Member, or the entire CoC Board, may be removed for cause by a two-thirds (2/3) vote of the Orange County CoC Voting Membership at a specially called meeting. Cause is constituted by a violation of the Conflict of Interest regulations or a violation of the Code of Conduct.

C. CoC General Membership

CoC General Membership is based upon organizations within the Geographic Area participating in the responsibilities of the Orange County CoC by having organizational representatives actively participate in CoC Board, committees, ad hocs and working groups.

As noted in § 578.5 Establishing the CoC. Relevant organizations will 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 and homeless and formerly homeless individuals.”

Additionally, the Orange County CoC will strive to ensure representation from diverse and public agencies including those dedicated to behavior health; substance use recovery services; health; employment training and development; youth; the two-spirit, lesbian, gay, bisexual, trans, queer, questioning, intersex, asexual/aromantic and all other sexual

orientations and genders (2SLGBTQQA+) community; and housing and community development.

a. Nominations for Orange County CoC General Membership

A public invitation within the Geographic Areas of the CoC will be extended annually for new members to join in accordance with the HEARTH Act as described in § 578.7 Responsibilities of the CoC.

b. General Membership Terms

There is no term limit. Membership, however, may be terminated by the Orange County CoC in accordance with subsection I. Removal below.

c. Continuum of Care Meetings

The Orange County CoC will hold meetings of the full membership with published agendas at least twice a year. The Orange County Service Provider Forum serves to facilitate CoC full membership meetings.

d. Quorum

A number equal to a majority of those belonging to the Orange County CoC will constitute a quorum for the transaction of business at any general membership meeting.

e. Voting

At all meetings, business items may be decided by arriving at a consensus. If a vote is necessary, all votes will be by voice or ballot at the will of the majority in attendance. The exception to this rule is a vote to elect Members, in this case a vote will be held by secret ballot. Each active organization will have one vote given by one representative even when more than one organizational representative is present. No active organization may vote on any item which presents a real or perceived conflict-of-interest.

f. Conflict of Interest

CoC General Members must comply with the conflict of interest and recusal process found in the § 578.95 Conflicts of interest of HEARTH Act² and any additional requirements as outline in the Charter and the Orange County CoC Conflict of Interest Policy and Procedure (Attachment A).

g. Code of Conduct

Members will ensure a commitment to the Orange County CoC Code of Conduct (Attachment B).

h. Removal

Any CoC General Member of the Orange County CoC may be removed by a two-thirds majority of all organizations present during a scheduled meeting.

² CFR 24 578.95 § 578.95 Conflicts of Interest: <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>

D. Collaboration with Commission to End Homelessness

The Commission to End Homelessness focuses on regional policy and implementation strategies, affordable housing development, data and gaps analysis, best practice research, social policy and systemic change to promote an effective response to homelessness within the County of Orange. The CoC Board will regularly provide information and recommendations around CoC funded homeless programs to the Commission to End Homelessness. This will ensure regional alignment of efforts to resolve homelessness.

1. The CoC Board will collaborate with the Commission to End Homelessness to:
 - a. Address gaps within the System of Care;
 - b. Strengthen operational performance;
 - c. Ensure regional access and alignment;
 - d. Receive expertise related to each System of Care component in support of the CoC System integration objectives; and
 - e. Identify, secure and prioritize funding opportunities that provide system enhancements within the five components of the System of Care” Community Corrections, Behavioral Health, Healthcare, housing, Benefits and Support Services.
2. The CoC Board will at least annually report to the Commission to End Homelessness on the progress of the Orange County CoC. These reports may include:
 - a. HUD System Performance Measures (SPM) Report
 - b. Housing Inventory Chart (HIC)
 - c. Gaps Analysis Reports
 - d. Point-in Time (PIT) Count (unsheltered biennially and sheltered annually)
 - e. Funding priorities, grants and funding awards from federal and state government
 - f. Any other reports requested by the Commission to End Homelessness to help further system of care policy recommendations and regional system development.
3. The chairperson of the CoC Board and the Commission to End Homelessness may establish ad hoc committees to provide recommendations regarding time-limited tasks that support the goals of the Commission to End Homelessness and assist in the functions of the CoC Board.

4. Non-conflicted Commission to End Homelessness members may participate on review panels concerning the award of a grant or other program funding related to the CoC when there is a conflict of interest among CoC Board members.

VI. Continuum of Care Legal Entity

The County of Orange is the Collaborative Applicant who will submit grants to HUD on behalf of the project applicants comprised in the Orange County CoC. All contracts funded by the CoC competition have direct contracts with HUD. Submission will be in compliance with § 578.9. The County of Orange is the designated administrative entity and fiscal agent for homeless services system funding awards that intersect with the CoC and the System of Care programs.

VII. Public Statement and Media Policy

In the interest of presenting a unified voice in the community, the Collaborative Applicant, County of Orange, is the designated spokespersons and media points of contact for the Orange County CoC for inquiries or official statements related to the Orange County CoC. Members will refrain from making public comments or speaking to the media on behalf of the Orange County CoC, unless the Collaborative Applicant determines that the interests of the Orange County CoC are best served by another member speaking on behalf of the group. When making public statements or speaking to the media on issues related to homelessness, Members will make clear, to the best of their ability, whether they are speaking in their own organization's/individual's name or on behalf of the Orange County CoC.

Orange County Continuum of Care Governance Charter Attachment B.

Orange County Continuum of Care Code of Conduct

Overview

The Orange County Continuum of Care (CoC) Code of Conduct (Code of Conduct) is a commitment to creating safe, inclusive spaces and opportunities for authentic engagement amongst CoC Board members (Members); committee, ad hoc and working group members; CoC staff; CoC general members; and members of the public attending CoC meetings, including people with lived experience of homelessness and community partners. The commitment to ensure a safe, inclusive space happens within all meetings of the CoC, including but not limited to meetings of the CoC Board, committees, ad hocs and working groups.

Applicability

All participants of all CoC meetings are accountable to one another and encouraged to follow this Code of Conduct to ensure everyone in attendance feels safe, respected and included. The Code of Conduct is applicable to:

- CoC Board members
- CoC committee, ad hoc and working group members
- Collaborative Applicant staff
- CoC general members
- Members of the Public attending CoC meetings

Core Values

The CoC Board is committed to fostering diversity within the CoC Board and its committees, ad hocs and working groups to reflect the identities and experiences of people experiencing homelessness in Orange County. Further, the CoC Board is committed to valuing and respecting the dignity of all persons, and establishing inclusion and equity within the practices of meeting preparation and facilitation. As such, the CoC Board instructs that the Orange County CoC is driven by the core values listed below:

1. **Equity.** Authentically engage and center diverse voices, including people with lived expertise, within the decision-making process of the CoC.
2. **Dignity.** Every person has the right to be treated ethically, and to be valued and respected.
3. **Safety.** Create an environment where all feel safe, valued and treated with dignity.

Code of Conduct Guidelines

The core values of the Orange County CoC are lived out through the Code of Conduct Guidelines at all CoC meetings.

1. **Every person participating in CoC meetings will be engaged with value, inclusivity and dignity.**
 - Meeting facilitators and participants will treat one another with dignity and respect.
 - Authentic engagement of people with lived expertise will be centered in decision-making processes.
 - CoC Board and Committee membership will receive public comment for consideration before voting on a recommended action.

Item 1. Attachment C

- Public comments are opportunities to lift thoughts, concerns and feedback. Members of the public will be provided opportunities to share verbally or in writing at least 24 hours before the meeting and special accommodations will be made as needed to ensure inclusive participation.
 - All persons will receive equitable treatment without discrimination of race, color, national origin, religion, sex (including pregnancy and gender identity), age, marital and parental status, disability, sexual orientation, or genetic information.
- 2. Communication of meeting topics and expectations for facilitation and/or participation in CoC meetings will be accessible.**
- Meeting materials will be accessible online and in-person, as requested and in accordance with the Brown Act requirements, to remove barriers to participation from members of the public.
 - Value-based communication, person centered, or strength-based communication centered around the values and vision of the CoC, will be the goal.
 - All CoC meeting participants will seek to communicate in ways that are not harmful, even in disagreement. Communication styles, nonverbal body language, posturing and/or and word choices will not seek to further escalate a conversation or conflict.
- 3. Uphold and maintain a safe and secure environment for all meeting spaces.**
- Disruptive behavior is prohibited from all meeting spaces to ensure safety and security of meeting participants. “Disruptive behavior” means behavior that disrupts, disturbs, impedes, or renders infeasible the orderly conduct of the meeting.
 - If a meeting participant’s behavior is disruptive, the CoC Board officers, Committee Chairs, or Committee Vice Chairs of the CoC meeting will warn the meeting participant of their behavior. If the meeting participant does not stop the disruptive behavior, they will be asked to leave the meeting.
 - Verbal or physical threats or violence – including name-calling, bullying, or othering of meeting participants – will not be tolerated.

Implementation and Accountability

The CoC Board, and those facilitating CoC meetings such as, the CoC Committee Chairs and Vice Chairs and Collaborative Applicant are committed to ensuring these values are honored and willing to respond and provide the leadership that is needed to implement the Code of Conduct within CoC meetings.

There is a commitment to orienting the public as to how to share input and engage in meeting space. For each CoC Board meeting and committee meeting, there is a description on the process of providing public comment and engaging within the public meeting space. The Code of Conduct will be publicly available on the CoC webpage and can be made available at meetings of the CoC Board and committees.

Violations of the Code of Conduct can result in a verbal warning, being removed from a meeting space, and other consequences in accordance with local laws.

No Code of Conduct can cover every possible situation, therefore, if you have any concerns about the Code of Conduct or related questions, the Office of Care Coordination, as the Administrative Entity and Collaborative Applicant for the Orange County CoC, can be contacted by phone at (714) 834-5000 or by email at CareCoordination@ocgov.com.

Orange County Continuum of Care Governance Charter Attachment A.

Orange County Continuum of Care Conflict of Interest Policy and Procedure

Background

The purpose of the Orange County Continuum of Care (CoC) Conflict of Interest Policy and Procedure (Conflict of Interest) is to avoid a conflict of interest, financial interest, or the appearance of a conflict of interest or financial interest, of a member of the CoC Board (Member), CoC General Member (General Member), member of a CoC committee, ad hoc or working group and demonstrate the Orange County CoC's commitment to the highest standards of integrity, fairness, and conduct.

Definitions

- Member(s): Elected members of the CoC Board, including the CoC Board Chair, Vice Chair and Secretary.
- General Member(s): Any voting CoC General Member, including voting CoC General Members serving as appointed members of a CoC committee, ad hoc or working group.
- Other Individual(s): Any person serving as an appointed member of a CoC committee, ad hoc or working group who is not a voting CoC General Member or CoC Board member.
- Conflict of Interest: A conflict of interest is defined as a situation that exists when a Member, General Member, or Other Individual participating on a CoC committee, ad hoc or working group, has competing commitments, obligations, duties or goals with the interest and activities of the CoC. Examples of common conflicts of interests may include situations in which the Member, General Member, or other individual:
 - Is employed by an agency that receives CoC funds as a recipient, subrecipient or contractor
 - Has a spouse or domestic partner who provides consulting services to or is on the Board of an agency that is seeking CoC funds
 - Is employed by an organization that has an investment in one or more CoC funded projects (e.g., a government agency or intermediary organization that provides match, capital funding, or tax credit syndication).
 - Has a child who is receiving services from a CoC funded project.
 - Owns property that receives rental payments from a CoC recipient.
 - Has a sibling who owns a business that provides goods or services to a CoC funded project.
- Financial Interest: A Member, General Member, or Other Individual has a financial interest if they have, directly or indirectly, through business, investment, or family:
 - An ownership or investment interest in any entity with which the CoC has a transaction or arrangement;
 - A management position in any entity which has a financial interest, such as serving on the Board of an organization with a financial interest in the CoC;
 - A compensation arrangement with the CoC or with any entity or individual with which the CoC has a transaction or arrangement; or
 - A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the CoC is negotiating a transaction or arrangement.
 - Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial. A financial interest is not necessarily a conflict of interest. A person who has a financial interest may have a conflict of interest only if the Board decides that a

Item 1. Attachment D

conflict of interest exists, in accordance with this policy. Members, General Members or Other Individuals with lived experience of homelessness receiving compensation for their participation on the CoC Board or CoC committees, ad hocs or working groups, should not be seen as having a competing financial interest.

Policy:

Members, General Members, and Other Individuals must comply with the conflict of interest and recusal process found in §578.95 Conflicts of Interest in the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act)¹ and any additional requirements per the CoC Governance Charter (Sections V.B.7.1. and V.C.f.).

Procedures

1. Recusal of Self – A Member, General Member, or Other Individual shall recuse themselves at any time from involvement in any discussion or decision in which the Member believes they have or may have a conflict of interest or financial interest. A Member, General Member, or Other Individual shall not vote nor attempt to influence any other Member, General Member, or Other Individual on a matter under consideration by the CoC Board and/or its affiliated committees, ad hocs or working groups as follows:
 - Regarding the provision of services by such Member, General Member, or Other Individual (or by an organization or entity that such Member, General Member, or Other Individual represents, is employed by, and/or has other strong affiliations); or
 - By providing direct financial benefit to such Member, General Member, or Other Individual or the immediate family², partner, spouse, etc. of such Member, General Member, or Other Individual; or
 - Engaging in any other activity determined by the County, State or Federal law, regulations, and ordinances to constitute a conflict of interest.
2. Duty to Disclose – It is within the Conflict of Interest that a Member, General Member, or Other Individual must disclose the existence of any conflicts of interest and/or financial interest in relation to their involvement with the CoC. It is the duty of the Member, General Member, and Other Individual participating on a CoC committee, ad hoc or working group to review meeting agendas and inform the CoC Board and/or Committee Chairs and/or Vice Chairs of any perceived, actual, or potential conflicts of interest prior to the meeting.
3. Determining Whether a Conflict of Interest Exists – If a question arises as to whether a conflict of interest exists that may prevent a Member, General Member, or Other Individual from voting, the Chair or designee may consult with the Collaborative Applicant staff to assist in making that determination.
4. Violation of the Conflict of Interest Policy – If the CoC Board officers, Committee Chairs, Committee Vice Chairs or the Collaborative Applicant has reasonable cause to believe a Member, General Member, or Other Individual has failed to disclose actual, possible or preserved conflicts of interest, they shall inform the Member, General Member, or Other Individual of the basis for such belief and afford an opportunity to explain the alleged failure to disclose. If, after hearing the response of the Member, General Member, or Other Individual, and after making further

¹ CFR 24 578.95 § 578.95 Conflicts of Interest: <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>

² The HEARTH Act does not define "Immediate Family" but the term can be understood to mean, at a minimum, a parent, spouse, domestic partner, child, or sibling.

Item 1. Attachment D

investigation as warranted by the circumstances, the CoC Board determines there was a failure to disclose an actual, possible or preserved conflict of interest, additional action may be taken.

Annual Statements

Each Member, General Member, or Other Individual will sign a statement upon being elected or appointed, and annually in January thereafter, that verifies they have received, reviewed, and agreed to comply with the Orange County CoC Conflict of Interest Policy and Procedure at the start of each term served on the CoC Board or a CoC committee, ad hoc or working group. If there are any situations where any new conflicts arise and/or the disclosure and statement of conflicts may need revisions, the Member, General Member, or Other Individual shall disclose such changes to the CoC Collaborative Applicant and needed revisions at the earliest opportunity.

Exceptions and Changes

The CoC reserves the right to make an exception to the Orange County CoC Conflict of Interest Policy and Procedure based on communication from HUD that impacts the CoC's ability to carry out the policy and procedure as described above. The CoC also reserves the right to amend the policy and procedure on an annual basis.

DRAFT

Orange County Continuum of Care Conflict of Interest Disclosure and Statement

I, _____, as a Member, General Member, or Other Individual participating on the Orange County Continuum of Care (CoC) Board, and/or its affiliated committees, ad hocs or working groups, confirm that I have received and reviewed the Orange County CoC Conflict of Interest Policy and Procedure and that I agree to comply with that policy and the procedures it establishes.

I also agree to report promptly to the CoC Board Chair, Vice Chair and/or Secretary and the County of Orange staff as the Collaborative Applicant for the Orange County CoC, any **future** situation of an actual, possible or preserved conflict of interest between my outside interests and the best interests of the CoC. _____ (initial)

I furthermore certify that I have below disclosed all relationships, positions, funding, or other circumstances in which I am involved and believe could contribute to any actual, possible or preserved conflict of interest as a Member of the Orange County CoC Board and/or its affiliated committees, ad hocs or working groups. _____ (initial)

DISCLOSURE OF ANY QUALIFIED CONFLICTS OF INTEREST:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

By signing this statement, I agree that the information provided is accurate, to the best of my knowledge. If any changes to this information arise, I will complete a new disclosure and statement form.

Signature

Date

Printed Name

Date: May 14, 2024

Subject: Coordinated Entry System (CES) Housing Assessment Recommendation

Recommended Action:

- a. Approve updated CES Housing Assessment, including the addition of housing opportunity descriptions and accessibility questions, to be recommended to the Continuum of Care (CoC) Board for approval.

Background and Analysis

The Office of Care Coordination, as the CES Lead for the Orange County CoC, received feedback from people participating in CES, CES Access Points, housing providers, shelter providers, and CES Administrators with the recommendation of adding updated descriptions to the housing interest options and additional questions regarding accessibility. In response to the feedback, the CES Housing Assessment was revised to incorporate housing opportunity descriptions and accessibility questions. To ensure involvement of CoC and CES partners in the design of the revised assessment, the Office of Care Coordination established a timeline for sharing the revised CES Housing Assessment with the CoC and members of the public.

On May 1, 2024, the updated CES Housing Assessment was presented to the Lived Experience Advisory Committee (LEAC) for review and feedback. At this meeting, the Office of Care Coordination provided an overview of the proposed changes to the CES Housing Assessment, updated the LEAC on the anticipated next steps and received feedback on the current proposed changes. The updated CES Housing Assessment was also presented to the CES Steering Committee meeting on May 1, 2024, for review. The CES Steering Committee took action to recommend the CES Housing Assessment move forward for review and approval by the Policies, Procedures and Standards (PPS) Committee. On May 2, 2024, the public review and feedback period began and an updated draft of the Housing Assessment was distributed to the CoC distribution list and all CES partners. Public feedback was invited through written feedback via email to CoordinatedEntry@ocgov.com, until May 10, 2024. The updated CES Housing Assessment with the proposed revisions is included as **Attachment A**. Feedback received from the LEAC, CES Steering Committee and members of the public, inclusive of CoC and CES partners, is included in **Attachment C**.

The draft of the updated CES Housing Assessment detailing the recommended revisions is being presented to the PPS Committee for approval. If approved, the CES Housing Assessment will be presented at the May 22, 2024, CoC Board meeting for final approval. Recommended action will allow for the CES to operate more inclusively in responding to accessibility needs related to housing.

Attachments

Attachment A – CES Housing Assessment – Redline Version

Attachment B – CES Housing Assessment – Clean Version

Attachment C – CES Housing Assessment Feedback Received

Client Name: _____



Coordinated Entry Housing Needs Assessment

PRE-ASSESSMENT

Assessment Date (MM/DD/YYYY): ____/____/____

Assessment City Location: _____

Assessment Type: Phone Virtual In Person

Assessment Level: Crisis Needs Assessment Housing Needs Assessment

OF THE HOUSING OPPORTUNITIES THE HOUSEHOLD IS ELIGIBLE FOR, WHICH OF THE FOLLOWING HOUSING TYPES IS THE HOUSEHOLD INTERESTED IN?

Rapid Re-Housing (RRH) provides time-limited rental assistance paired with time-limited supportive services. There is no minimum income requirements for participating in RRH. The goal of RRH is to increase or maintain income to be able to keep paying rent after the rental assistance ends.

1. Rapid Re-Housing Yes No

Housing Choice Voucher (HCV) includes ongoing rental assistance with limited to no supportive services.

2. Housing Choice Voucher Yes No

Permanent Supportive Housing (PSH) provides ongoing rental assistance with intensive ongoing supportive services. Participation in supportive services is voluntary. Households experiencing chronic homelessness are primarily prioritized for PSH.

3. Permanent Supportive Housing Yes No

ACCESSIBILITY NEEDS

If you, or anyone in your household, have a disability, you may need accessible housing. This may mean you need ramps or wider entrances, space for medical equipment or a wheelchair, or special light switches, electrical outlets, and other fixtures.

If you, or anyone in your household, need accessible housing, you will only be considered for housing options that can meet your needs. There will be more housing options available to you if accessibility is not a concern.

These questions are about some common needs. If you have needs not covered by these questions, please list them at the end of the assessment.

1. Do you require a mobility accessible unit due to a physical disability? Yes No

2. Do you require a sensory accessible unit due to loss of hearing or sight? Yes No

3. Do you require some accommodations but not all the features of an accessible unit? Yes No

Please indicate your needs below:

a. no stairs Yes No

b. grab bars Yes No

c. seat in tub or shower Yes No

d. other Yes No If other, please specify _____

4. Is there anything else about your accessibility needs that we should know?

SELECTING THE PRIVATE CHECKBOX MEANS ONLY USERS WITH ACCESS TO THE CURRENTLY SELECTED AGENCY WILL BE ABLE TO SEE THIS ASSESSMENT

Is this client private? Yes No



Coordinated Entry Housing Needs Assessment

PRE-ASSESSMENT

Assessment Date (MM/DD/YYYY): ____/____/____

Assessment City Location: _____

Assessment Type: Phone Virtual In Person

Assessment Level: Crisis Needs Assessment Housing Needs Assessment

OF THE HOUSING OPPORTUNITIES THE HOUSEHOLD IS ELIGIBLE FOR, WHICH OF THE FOLLOWING HOUSING TYPES IS THE HOUSEHOLD INTERESTED IN?

Rapid Re-Housing (RRH) provides time-limited rental assistance paired with time-limited supportive services. There is no minimum income requirements for participating in RRH. The goal of RRH is to increase or maintain income to be able to keep paying rent after the rental assistance ends.

1. Rapid Re-Housing Yes No

Housing Choice Voucher (HCV) includes ongoing rental assistance with limited to no supportive services.

2. Housing Choice Voucher Yes No

Permanent Supportive Housing (PSH) provides ongoing rental assistance with intensive ongoing supportive services. Participation in supportive services is voluntary. Households experiencing chronic homelessness are primarily prioritized for PSH.

3. Permanent Supportive Housing Yes No

ACCESSIBILITY NEEDS

If you, or anyone in your household, have a disability, you may need accessible housing. This may mean you need ramps or wider entrances, space for medical equipment or a wheelchair, or special light switches, electrical outlets, and other fixtures.

If you, or anyone in your household, need accessible housing, you will only be considered for housing options that can meet your needs. There will be more housing options available to you if accessibility is not a concern.

These questions are about some common needs. If you have needs not covered by these questions, please list them at the end of the assessment.

1. Do you require a mobility accessible unit due to a physical disability? Yes No

2. Do you require a sensory accessible unit due to loss of hearing or sight? Yes No

3. Do you require some accommodations but not all the features of an accessible unit? Yes No

Please indicate your needs below:

a. no stairs Yes No

b. grab bars Yes No

c. seat in tub or shower Yes No

d. other Yes No If other, please specify _____

4. Is there anything else about your accessibility needs that we should know?

SELECTING THE PRIVATE CHECKBOX MEANS ONLY USERS WITH ACCESS TO THE CURRENTLY SELECTED AGENCY WILL BE ABLE TO SEE THIS ASSESSMENT

Is this client private? Yes No

2024 CES HOUSING ASSESSMENT FEEDBACK

The CES Housing Assessment was presented to the Lived Experience Advisory Committee (LEAC) and CES Steering Committee on May 1, 2024. The CES Housing Assessment was then made available for public review and feedback from May 2, 2024, through May 10, 2024. The feedback below was received during the Lived Experience Advisory Committee Meeting, the CES Steering Committee Meeting and in writing through the Coordinated Entry email inbox.

I would like to make a suggestion on the Accessibility Needs statement: "If anyone, in your household, (including yourself) need accessible housing, housing options that can meet those needs will only be available for consideration. There are more housing options available if accessibility is not a concern."

Instead of YES/NO options for the accessibility needs section, provide an answer scale of "not required, preferred, or required"

Replace "... with tenant paying 30% of their income towards housing," with "to assist the tenant with paying rent."

In the Accessibility Needs section, replace the term "need accessible housing" with "requires accessible housing."

Thank you for the draft Housing Needs Assessment form. I think this is very helpful in providing the necessary information for each CES partner to review with the participant. In addition, the last question about is the client private, if more info can be added there that would help clarifying the question for new CES partners/providers.

I wanted to add one more item. In the options for housing, to add shared housing as an option.

I like the new description for the type of housing support offered; however, for ease of reading...I would place the choice first and the description to follow:

Example:

3. PSH

Description

The rest looks fine and appropriate.

Thanks for soliciting feedback. A few suggestions. First, simpler language (suggestions below) may make it easier to use. Second, when sending out emails for feedback it may be best to use the response email as the address for the initial communication. This way folks can just hit reply. Third, it may be easier to send out a Word document that can be edited so folks won't have to retype or copy over text. Some suggested revisions:

Rapid Rehousing (RRH): the Rapid Rehousing program provides rental assistance along with supportive services for a limited amount of time. The goal of Rapid Rehousing it to increase or maintain income levels so that clients can afford to continue paying rent once the rental assistance and support ends.

Housing Choice Voucher (HCV): Housing Choice Vouchers provide ongoing rental assistance, with the tenant paying 30% of their income towards housing. This program provides limited or no supportive services.

Permanent Supportive Housing: Permanent Supportive Housing provides ongoing rental assistance with thorough ongoing support. Participation in that support is voluntary. This program primarily targets households experiencing enduring or chronic homelessness.

Item 2. Attachment C

Yes, I over looked the draft, looks good.

Feedback

1. Service animals and emotional support animals needs to be addressed.
 2. Handicap Parking accessibilty.
-

It's beautiful.

This makes a lot more sense to me. I like the rendition.

The form looks really good! The extra information is a great addition.

I like the new form.
