

ORANGE COUNTY
CONTINUUM OF CARE BOARD
Wednesday, August 28, 2024
2:00 p.m. – 5:00 p.m.

Location:

**County Administration South (CAS) Building
Conference Center
425 West Santa Ana Blvd. Room 104/106
Santa Ana, CA 92701-4599
[Click Here](#) for parking information.**

Virtual Meeting Option*:

**Zoom Meeting Link: [Click here for meeting link](#)
Join by phone: +1 669 900 9128
Webinar ID: 963 2370 2539**

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

AGENDA

Board Members

Judson Brown, City of Santa Ana
LaVal Brewer, South County Outreach
Dr. Kelly Bruno-Nelson, CalOptima Health
Andrew Crowe, Scholarship Prep
Nichole Gideon, Individual [Secretary]
Becks Heyhoe-Khalil, OC United Way
Sandra Lozeau, City of Anaheim
Melanie McQueen, PATH
Nishtha Mohendra, Families Forward
Robert “Santa Bob” Morse, Individual

Talesha Payne, Individual
Jason Phillips, Individual
Dawn Price, Friendship Shelter
Maricela Rios-Faust, Human Options
Ami Rowland, Covenant House California
George Searcy, Individual
Dr. Shauntina Sorrells, Individual [Vice Chair]
Tim Shaw, Individual [Chair]
Christina Weckerly Ramirez, Health Care Agency

In compliance with the Americans with Disabilities Act, and County Language Access Policy, those requiring accommodation and/or interpreter services for this meeting should notify the Office of Care Coordination 72 hours prior to the meeting at (714) 834-5000 or email CareCoordination@ocgov.com. Requests received less than 72 hours prior to the meeting will still receive every effort to reasonably fulfill within the time provided.

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Call to Order – Tim Shaw, Chair

Board Member Roll Call – Nichole Gideon, Secretary

Public Comments: Members of the public may address the CoC Board 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 CoC Board. Members of the public may address the CoC Board with public comments on agenda items in the business calendar 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.

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Board Member Comments: Members of the CoC Board may provide comments on matters not appearing on the agenda so long as the subject matter is within the jurisdiction of the CoC Board.

CONSENT CALENDAR

All matters are approved by one motion unless pulled by a Board Member for discussion or separate action. The CoC Board requests that only pertinent information be discussed during this time.

1. **Approve CoC Board Meeting Minutes from June 26, 2024**
2. **Approve CoC Board Meeting Minutes from July 24, 2024**

BUSINESS CALENDAR

1. **Continuum of Care Builds (CoCBuils) Notice of Funding Opportunity (NOFO)** – Sarah Jones, CoC Manager, Office of Care Coordination
 - a. Authorize the Orange County CoC’s participation in the CoCBuils NOFO.
 - b. Establish an Ad Hoc comprised of non-conflicted members to support the local competition process for the CoCBuils NOFO
 - c. Approve the issuance of a local competition process for the CoCBuils NOFO to provide Permanent Supportive Housing units in Orange County.
 - d. Approve the recommended CoCBuils NOFO scoring criteria and funding priorities.
2. **2024 CoC Nominating Ad Hoc** – Felicia Boehringer, CoC Administrator, Office of Care Coordination
 - a. Establish the 2024 CoC Nominating Ad Hoc to support the Nomination and Election for the CoC Board, including the review of the CoC Board composition, qualifications and nomination and election process detailed within the CoC Governance Charter.
3. **Policies, Procedures and Standards (PPS) Committee Recommendations** – Sarah Jones, CoC Manager, Office of Care Coordination; Erin DeRycke, Director of Data Analytics, 2-1-1 Orange County (211OC), Orange County United Way; and Nishtha Mohendra, PPS Committee Chair

- a. Approve the recommended changes to the Homeless Information Management System (HMIS) Policies and Procedures inclusive of the HMIS Client Consent Form, as recommended by the PPS Committee and HMIS Policies and Procedures Working Group.
 - b. Approve the updated CES Housing Assessment, including the addition of housing opportunities descriptions and revisions to the Accessibility Needs section, as recommended by the PPS Committee and CES Steering Committee.
4. **Alianza Translatinx: Orange County's Inaugural TGI Survey Findings Presentation** – Khloe Rios-Wyatt, President and Chief Executive Officer, Alianza Translatinx
5. **Fiscal Year (FY) 2024 and FY 2025 CoC Program NOFO** – Sarah Jones, CoC Manager, Office of Care Coordination and Felicia Boehringer, CoC Administrator, Office of Care Coordination
 - a. Overview of FY 2024 and FY 2025 CoC Program NOFO release by the U.S. Department of Housing and Urban Development
 - b. Update on the FY 2024 CoC Program NOFO local competition.
6. **Orange County Homelessness Updates** – Doug Becht, Director of Office of Care Coordination and Sarah Jones, CoC Manager, Office of Care Coordination
 - a. System of Care Update
 - b. CoC Update
7. **Next Meeting:** Wednesday, September 25, 2024, from 2:00 p.m. – 5:00 p.m.

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Call to Order – Tim Shaw, Chair

Chair Tim Shaw called the meeting to order at 2:03 p.m.

Board Member Roll Call – Nichole Gideon, Secretary

Present: Judson Brown, Dr. Kelly Bruno-Nelson, Andrew Crowe, Nichole Gideon, Becks Heyhoe, Melanie McQueen, Nishtha Mohendra, Robert “Santa Bob” Morse, Dawn Price, Maricela Rios-Faust, Ami Rowland, George Searcy, Dr. Shauntina Sorrells, Tim Shaw, and Christina Weckerly Ramirez.

Absent Excused: LaVal Brewer, Sandra Lozeau, Frank Luna, Talesha Payne, and Jason Phillips.

Judson Brown left after Business Calendar Item 1. Dr. Shauntina Sorrells left during Business Calendar Item 4. Nichole Gideon left during Business Calendar Item 5.

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- No public comments.

Board Member Comments: Members of the CoC Board may provide comments on matters not appearing on the agenda so long as the subject matter is within the jurisdiction of the CoC Board.

- Robert “Santa Bob” Morse shared information regarding the average age of death for those housed was much older than people experiencing homelessness and stated that the gap should be addressed.
- Becks Heyhoe inquired on the follow up of the clarification on the “Subpopulations & Disabling Conditions” page of the 2024 Point In Time Count. Becks Heyhoe shared that Orange County United Way heard back regarding the Youth Homelessness System Improvement (YHSI) and unfortunately, Orange County was not awarded.
- Dr. Kelly Bruno Nelson shared information regarding Alianza Translatinx’s Orange County’s Inaugural Transgender, Gender Nonconforming, and Intersex (TGI) Survey report. The report can be found at: <https://www.alianzatranslatinx.org/highlights>
- Chair Tim Shaw thanked the Samueli Foundation and CalOptima Health for funding Alianza Translatinx’s Orange County’s Inaugural TGI Survey.
- Vice Chair Dr. Shauntina Sorrells asked if Alianza Translatinx can present at a future CoC Board meeting.
- Ami Rowland shared that planning for Youth Homelessness Demonstration Program (YHDP) has begun and in a future CoC Board meeting, there will be a resolution to vote the Youth Action Board under the Orange County CoC.

CONSENT CALENDAR

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1. Approve CoC Board Meeting Minutes from May 22, 2024

Melanie McQueen motioned to approve item 1 on the Consent Calendar. Maricela Rios-Faust seconded the motion. The motion passed with unanimous consent.

BUSINESS CALENDAR

1. Fiscal Year (FY) 2024 CoC Program Notice of Funding Opportunity (NOFO) – Sarah Jones, CoC Manager, Office of Care Coordination and Felicia Boehringer, CoC Administrator, Office of Care Coordination

The upcoming FY2024 CoC Program NOFO is anticipated to be released the U.S Department of Housing and Urban Development (HUD) in early Summer 2024. On June 11, 2024, the Office of Care Coordination, as the Collaborative Applicant for the Orange County CoC, released the FY2024 Agency Administrative Review for CoC-Funded Agencies in preparation for the FY 2024 CoC Program NOFO competition.

The FY2024 CoC NOFO Ad Hoc has met six times beginning in April 2024 to review the CoC Program NOFO application process; draft the proposed project performance measures, point allocations, and thresholds; review and refine the current Reallocation Strategy for CoC Renewal Projects; and discuss feedback received from the CoC-funded agencies on the proposed project performance measures at the CoC NOFO Renewal Meeting held on May 15, 2024. The FY2024 CoC Program NOFO Scoring and Rating Criteria was developed to support the evaluation of the FY2024 CoC Renewal Projects – including the project performance measures, thresholds and point allocations – and is being presented to the CoC Board for review and approval.

After further review of the current reallocation strategy and discussion with the FY2024 CoC NOFO Ad Hoc, there has been an identified need to provide additional clarifying language. The FY2024 CoC NOFO Ad Hoc provided recommendations to revise the reallocation strategy to note that it applies to projects that score less than 60 percent during two consecutive CoC NOFO funding cycles. Further, the FY2024 CoC NOFO Ad Hoc recommended clarifying that the reallocation strategy will be in effect starting when the second project performance score is provided to a CoC Renewal Project, in effort to promote an equitable evaluation and provide new projects sufficient time to ramp up. All projects that receive a project performance score of less than 60 percent will continue to receive technical assistance, as noted in the current reallocation strategy.

Recommended Action b: Approve the FY2024 CoC Program NOFO Scoring and Rating Criteria for Renewal Projects, including the project performance measures, thresholds and point allocations, as recommended by the CoC NOFO Ad Hoc.

Becks Heyhoe motioned to approve recommended action b. Andrew Crowe seconded the motion. Judson Brown, Dr. Kelly Bruno-Nelson, Andrew Crowe, Nichole Gideon, Becks Heyhoe, Melanie McQueen, Nishtha Mohendra, Robert “Santa Bob” Morse, Dawn Price, Maricela Rios-Faust, Ami Rowland, George Searcy, Dr. Shauntina Sorrells, Tim Shaw, and Christina Weckerly Ramirez voted yes. The motion passed.

Recommended Action c: Approve revised Reallocation Strategy for reallocating CoC Renewal Projects funding that have a project performance score of less than 60 percent during two consecutive CoC NOFO funding cycles, starting when the second project performance score is provided.

Becks Heyhoe motioned to approve recommended action c. Andrew Crowe seconded the motion. Judson Brown, Dr. Kelly Bruno-Nelson, Andrew Crowe, Nichole Gideon, Becks Heyhoe, Melanie McQueen, Robert

“Santa Bob” Morse, Ami Rowland, George Searcy, Dr. Shauntina Sorrells, Tim Shaw, and Christina Weckerly Ramirez voted yes. Nishtha Mohendra, Dawn Price, and Maricela Rios-Faust recused themselves before discussion and abstained from voting. The motion passed.

CoC Board Member Discussion:

- Becks Heyhoe asked questions regarding Attachment A, Attachment B, Referrals from CES measure, and Joint Transitional Housing and Permanent Housing-Rapid Rehousing Project Performance Measures and Thresholds.
- Vice Chair Dr. Shauntina Sorrells asked if only getting referrals from CES would create a wrong door approach.
- Andrew Crowe asked if there was known percentage globally regarding denials from Housing Providers measure.
- George Searcy inquired if the CoC NOFO Renewal Scoring and Rating Criteria is based on priorities for HUD and noted that some of the Scoring Criteria are threshold items that the CoC Board can establish.

2. Advance OC’s Homeless Management Information System (HMIS) Data Request – Erin DeRycke, Director, Data Analytics, 2-1-1 Orange County (211OC), Orange County United Way; Katie Kalvoda, Founder and President, Advance OC; and Shelbie Knox, Grants and Evaluation Manager, Community Legal Aid SoCal

On May 14, 2024, 211OC, on behalf of the Orange County CoC, received a data request from Advance OC. This request includes client-level data for all adults active in any project in HMIS from October 1, 2014, through December 31, 2023. This data will be used for research and analysis on the legal outcomes of those experiencing homelessness in Orange County.

Recommended Action a: Approve Advance OC’s HMIS data request for the period of October 1, 2014, through December 31, 2023, for the purposes of research and analysis on the legal outcomes of people experiencing homelessness in Orange County.

Dawn Price motioned to approve recommended action a. Melanie McQueen seconded the motion.

After further discussion, Vice Chair Dr. Shauntina Sorrells acting as CoC Board Chair motioned to table the item. Dawn Price seconded the motion. Dr. Kelly Bruno-Nelson, Andrew Crowe, Nichole Gideon, Becks Heyhoe, Melanie McQueen, Nishtha Mohendra, Robert “Santa Bob” Morse, Dawn Price, Maricela Rios-Faust, Ami Rowland, George Searcy, Dr. Shauntina Sorrells, and Christina Weckerly Ramirez voted yes. Tim Shaw recused himself before discussion and abstained from voting. The amended motion passed.

CoC Board Member Discussion:

- Dawn Price shared having trouble understanding the need for the project address, as that may not be associated with the client address, rather it may be the agency office address. Dawn Price stated that it is a good idea to check in with County Counsel on the intent of the data request.
- George Searcy inquired on the ultimate goal and how it can be achieved using the data requested.
- Becks Heyhoe asked what the logic model is, how many other entities Advanced OC has approached asking for Personal Identifiable Information (PII) and asked what the benefit to the CoC is. Becks Heyhoe noted that nine years of HMIS data is a large volume of data.
- Christina Weckerly Ramirez asked if the data request contains all project types in HMIS.
- Dr. Kelly Bruno-Nelson shared the understanding that the indicators have been concluded in other research and clarified if the intent is to identify whether the information holds true in Orange County.

- Nishtha Mohendra clarified the importance of the data and asked what the role Advance OC is going to be in the research.
- Maricela Rios-Faust shared similar sentiments to other CoC Board member comments. Maricela Rios-Faust asked what the benefit to the CoC is, and asked if there is a limit for data requests regarding how many years of data can be requested.

3. FY 2023 Longitudinal Systems Analysis Report – Elizabeth Andrade, Executive Director and Erin DeRycke, Director, Data Analytics, 211OC, Orange County United Way

The Longitudinal Systems Analysis (LSA) report is produced from each CoC's HMIS and compiled to create the Annual Homeless Assessment Report (AHAR) report submitted to the United States Congress by the U.S. Congress by HUD. The AHAR is a national-level report that provides information about homeless service providers, people and households experiencing homelessness, and various characteristics of that population. It also informs strategic planning for federal, state, and local initiatives designed to prevent and end homelessness. The LSA includes Emergency Shelter, Safe Haven, Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, and Other Permanent Housing projects that are participating in HMIS during the reporting period, which is October 1st through September 30th.

The LSA report is submitted annually to HUD via the Homelessness Data Exchange (HDX) 2.0 and provides HUD and CoCs with critical information about how people experiencing homelessness use the homeless service system.

CoC Board Member Discussion:

- Becks Heyhoe express interest in the date of the next HMIS Data and Performance Management meeting. Becks Heyhoe asked if it was possible to filter through the LSA data for subpopulations.
- Dawn Price gave kudos for the work done, and shared appreciation for the recommendations in the “gold box” on what work should be focused on.

4. 2024 Housing Inventory Count Presentation – Elizabeth Andrade, Executive Director and Erin DeRycke, Director, Data Analytics, 211OC, Orange County United Way

The Housing Inventory Count (HIC) is a point-in-time inventory of housing programs within a CoC that provide beds and units dedicated to serve people experiencing homelessness, or for permanent housing projects, that serve people experiencing homelessness as defined by HUD.

211OC as the HMIS Lead, completed the HIC and Sheltered Point-in-Time Count (PIT), on January 22, 2024, and submitted required data to HUD by the May 10, 2024, deadline. To view the HIC Count, visit the following link: [2024 Housing Inventory Count Overview](#).

Public Comments:

- Marisol Johnson with Dayle McIntosh Center asked if there was any data collected for people with disabilities and if not, asked if the data included in the Point In Time Count survey moving forward.

CoC Board Member Discussion:

- Melanie McQueen asked if the emergency shelter year-round category is a new addition to 2024.
- Dawn Price asked if there are any vouchers in the HIC.
- Becks Heyhoe asked if all vouchers are in the HIC.

5. Orange County Homelessness Updates – Doug Becht, Director of Office of Care Coordination and Sarah Jones, CoC Manager, Office of Care Coordination

- a. System of Care Updates – Doug Becht provided the following System of Care Update:

- The purpose of Commission to End Homelessness' Tiny Homes Ad Hoc is to evaluate alternative housing solutions including studying, defining, and identifying potential applications for Tiny Homes. The Tiny Home Ad Hoc is wrapping up site visits and interviews with organizations involved in the tiny home industry to determine available options and understand the challenges and benefits of development and will report at the August meeting of the Commission to End Homelessness.
 - The goal of the Homelessness Prevention and Stabilization Pilot (HPSP) Program is to assist households who are at risk of experiencing homelessness achieve housing stability by providing financial assistance to pay rental arrears, past due utility bills, and forward rent and/or utility bills based, and stabilization payments. The expected program enrollment for households will be 12-months, based upon need and to be evaluated on a quarterly basis. The Request for Proposals (RFP) closed on April 11, 2024. The proposals were evaluated, and Orange County United Way was selected by an evaluation panel. The University of California Irvine (UCI) will conduct the first phase of an evaluation study to measure the Program's effectiveness in maintaining housing stability for individuals who are on the brink of homelessness.
- b. CoC Updates – Sarah Jones provided the following CoC Updates:
- June 6, 2024, HUD announced the award of \$51.1 million in its first ever Youth Homelessness Systems Improvement (YHSI) Grant to 38 Communities across 26 states. Though the Orange County CoC was not awarded YHSI funding, the Orange County CoC plans to continue applying for future opportunities to serve more youth experiencing homelessness or at risk of homelessness.
 - On June 6, 2024, HUD announced the release of the FY 2023 Youth Homeless Demonstration Program (YHDP) NOFO. The Office of Care Coordination, as the Collaborative Applicant of the Orange County CoC, will work closely with the Transitional Age Youth (TAY) Collaborative Committee, Orange County United Way, youth-specific service providers, and local community partners to receive community feedback and submit the application on behalf of the Orange County CoC. The YHDP application is due on August 29, 2024.
 - The Office of Care Coordination provides regular updates on the calendar of activities for the Orange County CoC during the Quarter 3, highlighting activities and meetings.
 - Upcoming meetings:
 - Coordinated Entry System Steering Committee (IN PERSON): Wednesday, July 3, 2024, from 2:00 p.m. – 3:00 p.m.
 - Location: 1501 E. St Andrew Pl., Santa Ana, CA 92705
 - Policies, Procedures and Standards Committee (IN PERSON): Tuesday, July 9, 2024, from 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
 - Meeting may be cancelled in place of a special meeting
 - Veterans Committee Special Meeting (IN PERSON): Thursday, July 11, 2024, from 10:30 a.m. – 12:00 p.m.
 - Location: Orange County United Way, 18012 Mitchell South, Irvine, CA 92614
 - Transitional Age Youth Collaborative Committee (IN PERSON): Friday, July 12, 2024, from 1:00 p.m. – 2:00 p.m.
 - Location: Orangewood Foundation, 1575 17th St, Santa Ana, CA 92705
 - The Office of Care Coordination is seeking qualified applicants for the position of Continuum of Care Staff Specialist. This recruitment will close on Monday, July 1, 2024, at 11:59 p.m. (PDT). The Continuum of Care Staff Specialist will primarily be responsible for supporting the Office of Care of Coordination in expanding their support to people experiencing homelessness and other hard to

serve populations through the obligations as outlined in the CoC Planning Grant award. Please review the job listing and apply for the position at the [Job Posting Link](#).

- As key stakeholders in Orange County, the Office of Care Coordination invites you to share your recommendations on content you would like to see included for the upcoming Service Provider Forum meetings via SurveyMonkey at the following link: <https://www.surveymonkey.com/r/7C5CHP7>
- HUD is hosting a series of community conversations focused on successfully implementing the Violence Against Women Act (VAWA) and survivor-centered housing at the system, project, and human levels. Each conversation will feature a diverse panel of system leaders, project staff, and people with lived experiences from both the homelessness response and victim services worlds.
- Homeless Housing, Assistance and Prevention (HHAP) Program Round 6 has been included in the final budget deal of the FY2024-25 Governor's Budget. \$1 billion in one-time assistance will provide local governments funding to combat the homelessness crisis - tied to increased accountability measures.

CoC Board Member Discussion:

- Dr. Kelly Bruno-Nelson noted that there is a vast difference of the term tiny homes and shared that there is an opportunity for Orange County to determine the definition of the term. Dr. Kelly Bruno-Nelson stated that the Commission to End Homelessness' Tiny Home Ad Hoc report will give Orange County the opportunity to define and give characteristics to the term tiny homes.
- Becks Heyhoe announced that Orange County United Way will be running the Homelessness Prevention and Stabilization Pilot Program with partner agencies and shared the list of agencies.
- Nishtha Mohendra shared that she will be attending the National Alliance to End Homelessness conference in two weeks and encouraged others to share any sessions they are interested in getting more information on.

Maricela Rios-Faust motioned to adjourn the meeting. Becks Heyhoe seconded the motion. The motion passed with unanimous consent. Meeting adjourned at 4:43 p.m.

6. Next Meeting: Wednesday, July 24, 2024, from 2:00 p.m. – 5:00 p.m.

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Call to Order – Dr. Shauntina Sorrells, Vice Chair

Vice Chair Dr. Shauntina Sorrells called the meeting to order at 2:03 p.m.

Board Member Roll Call – Felicia Boehringer, Continuum of Care (CoC) Administrator

Present: Judson Brown, LaVal Brewer, Dr. Kelly Bruno-Nelson, Andrew Crowe, Sandra Lozeau, Melanie McQueen, Nishtha Mohendra, Robert “Santa Bob” Morse, Talesha Payne, Jason Phillips, Dawn Price, Maricela Rios-Faust, George Searcy, and Dr. Shauntina Sorrells.

Absent Excused: Nichole Gideon, Becks Heyhoe-Khalil, Ami Rowland, Tim Shaw, and Christina Weckerly Ramirez.

Nishtha Mohendra arrived before Public Comments.

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- A private citizen shared that they are a CalAim recipient and the organization serving them – which was assigned by CalOptima – is not sufficiently funded. The private citizen commented that the inadequate allotment from the County means that the agency struggles to meet client’s needs. The private citizen stated that it is also concerning that the Orange County Housing Authority takes too long to complete housing inspections and that the Orange County Housing Authority is a cesspool of disorganization, just like its Commission is a cesspool of hate and racism. The Orange County Housing Authority should be designated as a “troubled PHA” by HUD. As for the CoC Board, the private citizen stated that it is concerning that the best funded organization is headed by someone who proudly poses for selfies with hate crime perpetrators – that is the CEO of Human Options. The private citizen stated that the County Executive Office should be more judicious and discerning and allot funds to only those organizations who make a meaningful contribution to the community.
- Carrie Buck with Family Solutions Collaborative shared metrics and highlights from the Family Solutions Collaborative June 2024 Impact Report, with information regarding the variance between the year 2022 and 2024 of Housing Inventory Count for Families.

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- Jason Phillips read the names of people who have died without a fixed abode in May 2024.

- Vice Chair Dr. Shauntina Sorrells shared that the CoC Board Officers wrote a letter regarding Grants Pass which will be coming out on Monday. Vice Chair Dr. Shauntina Sorrells asked if anyone would like to review the letter to please email.
- George Searcy commented about wanting to view the letter before it before it becomes public.

CONSENT CALENDAR

All matters are approved by one motion unless pulled by a Board Member for discussion or separate action. The CoC Board requests that only pertinent information be discussed during this time.

1. Agencies and Jurisdictions Approved for Homeless Management Information System (HMIS) Access

- a. Receive and file list of agencies and jurisdictions approved for HMIS access from April 20, 2024, through July 19, 2024.

Nishtha Mohendra motioned to approve item 1 on the Consent Calendar. Sandra Lozeau seconded the motion. The motion passed with unanimous consent.

BUSINESS CALENDAR

1. Fiscal Year (FY) 2024 CoC Program Notice of Funding Opportunity (NOFO) – Sarah Jones, CoC Manager, Office of Care Coordination and Felicia Boehringer, CoC Administrator, Office of Care Coordination

Sarah Jones provided an overview of the CoC Program NOFO competition, noting that the FY 2024 CoC Program NOFO has not been released by the U.S. Department of Housing and Urban Development (HUD). To support the CoC NOFO local competition process, the Office of Care Coordination, on behalf of the Orange County CoC, has facilitated eight meetings of the CoC NOFO Ad Hoc to discuss the strategy for evaluating renewal projects that have not yet completed a full grant term; discuss recommended priorities for the voluntary reallocated funding; determine priorities for the CoC Bonus, DV Bonus and Reallocation projects; and recommend the CoC Bonus, DV Bonus and Reallocation Scoring and Rating Criteria.

Recommended Action a:

- i. Approve scoring and rating strategy for projects that have not yet operated for a full grant term, including first year renewal, Transition and Consolidation Projects, to be evaluated using only the applicable scoring criteria from the approved FY2024 CoC Renewal Scoring and Rating Criteria, as recommended by the CoC NOFO Ad Hoc.

Maricela Rios-Faust motioned to approve the recommended action a.i. Andrew Crowe seconded the motion. Judson Brown, LaVal Brewer, Dr. Kelly Bruno-Nelson, Andrew Crowe, Sandra Lozeau, Melanie McQueen, Robert “Santa Bob” Morse, Talesha Payne, Jason Phillips, Maricela Rios-Faust, George Searcy, and Dr. Shauntina Sorrells voted yes. Nishtha Mohendra and Dawn Price recused themselves during discussion and abstained from voting. The motion passed.

Recommended Action b:

- a. Accept the voluntary reallocation of \$242,702 in funding from Anaheim Supportive Housing’s Tyrol Plaza Senior Apartments project during the FY2024 CoC Program NOFO.
- b. Approve the CoC NOFO Ad Hoc recommendation to utilize the reallocated funding to solicit Permanent Supportive Housing projects (PSH) that serve Older Adults (ages 62 and older).

Robert “Santa Bob” Morse motioned to approve the recommended action b.i. and b.ii. Dawn Price seconded the motion. Judson Brown, LaVal Brewer, Dr. Kelly Bruno-Nelson, Andrew Crowe, Sandra Lozeau, Melanie McQueen, Nishtha Mohendra, Robert “Santa Bob” Morse, Talesha Payne, Jason Phillips, Dawn Price, Maricela

Rios-Faust, George Searcy, and Dr. Shauntina Sorrells voted yes. The motion passed.

Recommended Action c:

- i. Approve the Office of Care Coordination as the Collaborative Applicant for the Orange County CoC to create and issue a CoC Bonus and Reallocation Request for Proposals to solicit new Rapid Rehousing and Permanent Supportive Housing projects that primarily serve households with severe service needs or designate a minimum percentage of units to any of the following special populations, including Families (households with at least one minor child and one adult), Transitional Age Youth (ages 18 – 24), Individuals (adult only households) experiencing chronic homelessness and Older Adults (ages 62 and older) as recommended by the CoC NOFO Ad Hoc .
- ii. Establish a non-conflicted review panel to evaluate proposals received in response to the issued Request for Proposals.
- iii. Approve FY2024 CoC Bonus and Reallocation Scoring and Rating Criteria to evaluate proposals as submitted in response to the Request for Proposals.

Robert “Santa Bob” Morse motioned to approve the recommended action c.i., c.ii., and c.iii. Melanie McQueen seconded the motion. Judson Brown, LaVal Brewer, Dr. Kelly Bruno-Nelson, Andrew Crowe, Sandra Lozeau, Melanie McQueen, Nishtha Mohendra, Robert “Santa Bob” Morse, Talesha Payne, Jason Phillips, Dawn Price, Maricela Rios-Faust, George Searcy, and Dr. Shauntina Sorrells voted yes. The motion passed.

Recommended Action d:

- i. Approve the Office of Care Coordination as the Collaborative Applicant for the Orange County CoC to create and issue a DV Bonus Request for Proposals to solicit new Rapid Rehousing and Joint Transitional Housing and Permanent Housing – Rapid Rehousing (Joint TH/PH-RRH) projects that primarily serve households with severe service needs as recommended by the CoC NOFO Ad Hoc.
- ii. Establish a non-conflicted review panel to evaluate proposals received in response to the issued Request for Proposals.
- iii. Approve the FY2024 DV Bonus Scoring and Rating Criteria to evaluate proposals as submitted in response to the Request for Proposals.

Dawn Price motioned to approve the recommended action d.i., d.ii., and d.iii. Robert “Santa Bob” Morse seconded the motion. Judson Brown, LaVal Brewer, Dr. Kelly Bruno-Nelson, Andrew Crowe, Sandra Lozeau, Melanie McQueen, Nishtha Mohendra, Robert “Santa Bob” Morse, Talesha Payne, Jason Phillips, Dawn Price, Maricela Rios-Faust, George Searcy, and Dr. Shauntina Sorrells voted yes. The motion passed.

Public Comments:

- Paul Hyek expressed fondness for the proposal of utilizing reallocated funding to solicit projects serving older adults. Paul Hyek shared personal experiences with permanent supportive housing.
- David Gillanders with Pathways of Hope expressed excitement of changes and progressive thinking but noted that there should be caution in using Rapid Rehousing project types as a tool for intervention, specifically for people with severe service needs as those populations may be permanent supportive housing. David Gillanders emphasized the need to focus on permanent supportive housing as permanent solutions.
- Alan Achterbey shared personal experiences as a mentor, the need for sensitivity of male victims of domestic violence, and clarification on the term domestic violence and domestic abuse.
- Jon expressed opposition to funding towards Human Options, shared anecdotes of experiences with the Human Options Chief Executive Officer and provided reasons regarding the opposition of Human Options funding. Jon stated that the Orange County Housing Authority is a troubled Public Housing Authority and shared their personal experiences of currently experiencing homelessness.

- A private citizen stated that the previously read public comment should have read that the Orange County Housing Authority should have been designated as a trouble PHA, not a “trusted” PHA. With respect to the proposed funding for Human Options, the private citizen stated that they vociferously object because there has been no public audit of this organization’s accountability practices. In their experience with this organization, the private citizen states that the CEO focuses only homelessness related to domestic violence, not stalking; gang violence; or other any crime except domestic violence. The private citizen questioned as to how the CEO can presume to be against violence when they openly associate with stalkers and hate crime perpetrators. The private citizen stated to not fund Human Options without an audit.

CoC Board Member Discussion:

- Nishtha Mohendra inquired the reasoning as to why a project would not want to continue CoC funding. Nishtha Mohendra asked that if Orange County is a community focused on performing better with data that the CoC Bonus and Reallocation Scoring and Rating Criteria rubric should be relooked at.
- Judson Brown asked if staff or the CoC NOFO ad hoc consider that by having a specific eligibility criterion for the reallocation funding, that there will be a limitation on the populations served such as families. Judson Brown asked if there was information on unexpended Rapid Rehousing funds through CoC and Homeless Housing, Assistance and Prevention (HHAP) funding and shared inclination to remove rapid rehousing as a project type to solicit for CoC Bonus and Reallocation Request for Proposals. Judson shared that the Santa Ana Housing Authority serves Transitional Age Youth (TAY) through Foster Youth to Independence (FYI) vouchers and shared that youth should not be provided with rapid rehousing assistance that ends in two years and emphasized the need for permanent supportive housing.
- Robert “Santa Bob” Morse asked for the agency name that is voluntary reallocating.
- Dawn Price asked why the reallocation funding was not asked to be from a North Service Planning Area (SPA) project or provider as other SPAs may not be set up to serve North SPA. Dawn Price shared the need to revisit rapid rehousing as a whole.
- Andrew Crowe asked for clarification on reallocation process and noted that the second recommendation was not specific.
- George Searcy asked if there was any data on populations with severe service needs being served by rapid rehousing successfully.
- Vice Chair Dr. Shauntina Sorrells noted that when looking at the definition of severe service needs, there is a call out of victimization for specific populations and provided clarification on how the term can apply to other populations. Vice Chair Dr. Shauntina Sorrells clarified that FYI vouchers are only for foster youth and noted that there are also other TAY populations.
- Sandra Lozeau shared insight from the CoC NOFO ad hoc and stated that the ad hoc did not want to limit proposals and wanted to be flexible to see what options are out there. Sandra Lozeau noted that the Request for Proposals can be more specific if needed. Sandra Lozeau thanked the Service Providers, CoC Committees, and CoC NOFO ad hoc members for their feedback throughout the process.

2. Orange County CoC Youth Action Board Committee – Sarah Jones, CoC Manager, Office of Care Coordination

On June 6, 2024, the award of \$51.1 million in its first ever Youth Homelessness Systems Improvement (YHSI) grant to 38 Communities across 26 states, to further allocate resources to youth systems development. On the same day, HUD announced the FY2023 Youth Homelessness Demonstration Program (YHDP) NOFO Round 8 to support the implementation of coordinated community approaches in select communities, including providing direct assistance for tailored housing and services interventions for youth experiencing homelessness. Given that HUD continues emphasizing the need to integrate people with lived experience in decision-making

processes of the CoC, and specifically youth with lived expertise for communities applying for YHDP funding, the CoC Board is being asked to consider establishing a Youth Action Board (YAB).

Recommended Action a: Establish the Orange County CoC Youth Action Board, as recommended by the Transitional Age Youth Collaborative Committee.

Maricela Rios-Faust motioned to approve recommended action a. LaVal Brewer seconded the motion. Judson Brown, LaVal Brewer, Dr. Kelly Bruno-Nelson, Andrew Crowe, Sandra Lozeau, Melanie McQueen, Nishtha Mohendra, Robert “Santa Bob” Morse, Talesha Payne, Jason Phillips, Dawn Price, Maricela Rios-Faust, George Searcy, and Dr. Shauntina Sorrells voted yes. The motion passed.

Public Comments:

- Alejandro Santiago for Orange County United Way shared their support for item 2 for the creation of an Orange County YAB because it is important to help the youth, the youth’s needs, and important to inform the CoC Board to include youth voices, while also communicating with youth with tangible action items as youth’s voices are not just important but also needed. Alejandro Santiago stated that establishing the YAB creates a message and thanked everyone for the work being done.
- Tiffany Mitchell, the Chief Program Office at Orangewood Foundation, stated that as a participating body with the TAY Collaborative Committee, that Orangewood Foundation is in support of formalizing the YAB for Orange County. Tiffany Mitchell shared that Orangewood Foundation has envisioned that youth have the resource and support needed to survive and that it is important to have their voice at the table, prioritizing the YAB and backing with the County. Tiffany Mitchell quoted "Nothing about us without us", and shared that in everything we do, that we must ensure to include the people the decisions affect.
- Shelby Feliciano-Sabala, Chief Partnership Officer at Project Hope Alliance, shared support for the YAB and explained that when youth are offered to advocate into the services that benefit the youth, that can inclusive environment is created for the most marginalized. Shelby Feliciano-Sabala explained that Project Hope Alliance has a Youth Action Collaborative (YAC) which has expanded throughout the years and shared that an Orange County YAB is not only beneficial for youth and services, but also for youth voice and agency.

CoC Board Member Discussion:

- Maricela Rios-Faust stated that CoC Board membership should be taken into consideration, to ensure representation of youth on the CoC Board.
- Vice Chair Dr. Shauntina Sorrells shared that with CoC Board Elections coming up, there is a need for youth at the table.

3. Homeless Management Information System (HMIS) Access Working Group Member Appointment – Felicia Boehringer, CoC Administrator, Office of Care Coordination

On May 29, 2024, the Office of Care Coordination, on behalf of the Orange County CoC, sent out an email via the CoC distribution list notifying the CoC General Membership of a vacancy in the HMIS Access Working Group. The HMIS Access Working Group Interest Form was made available on SurveyMonkey and open from May 29, 2024, through June 14, 2024, inviting interested CoC General Members to apply and complete an interest form.

On Wednesday, July 17, 2024, the HMIS Access Working Group, CoC Collaborative Applicant and HMIS Lead reviewed all interested candidates, using the approved HMIS Access Working Group desired qualifications as a guide, to select the most qualified member for the working group to be recommended to the CoC Board for appointment. As such, the CoC Board is being asked to appoint Amy Lazari from Mercy House to the HMIS

Access Working Group to fill the current vacancy.

Recommended Action a: Appoint Amy Lazari to the HMIS Access Working Group.

Talesha Payne motioned to approve recommended action a. Melanie McQueen seconded the motion. Judson Brown, LaVal Brewer, Dr. Kelly Bruno-Nelson, Andrew Crowe, Sandra Lozeau, Melanie McQueen, Nishtha Mohendra, Robert “Santa Bob” Morse, Talesha Payne, Jason Phillips, Dawn Price, Maricela Rios-Faust, George Searcy, and Dr. Shauntina Sorrells voted yes. The motion passed.

CoC Board Member Discussion:

- Nishtha Mohendra shared excitement for increasing the group size and thanked the Office of Care Coordination for keeping the process organized.

4. Orange County Homelessness Updates – Doug Becht, Director of Office of Care Coordination and Sarah Jones, CoC Manager, Office of Care Coordination

a. System of Care Updates – Doug Becht provided the following System of Care Update:

- The Commission to End Homelessness meeting is being held on Wednesday, August 21, 2024, from 1:00 p.m. – 3:00 p.m.
- The Office of Care Coordination has received feedback from permanent housing development stakeholders to support an evaluation and assessment of the Coordinated Entry System (CES) and processes in place. As the CES Lead, the Office of Care Coordination is working closely with the contracted CES Administrators to identify solutions and recommendations for improvements to be presented to the CES Steering Committee for feedback.

b. CoC Updates – Sarah Jones provided the following CoC Updates:

- The Office of Care Coordination provides regular updates on the calendar of activities for the Orange County CoC during the end of Quarter 3 and beginning of Quarter 4, highlighting activities and meetings.
- Upcoming meetings:
 - Policies, Procedures and Standards Committee Special Meeting (IN PERSON):
Wednesday, July 31, 2024, from 3:00 p.m. – 4:30 p.m.
 - Location: CAS County Conference Center Room 104, 601 N Ross St, Santa Ana, CA 92701
 - Policies, Procedures and Standards Committee (IN PERSON): Tuesday, August 13, 2024, from 3:30 p.m. – 5:00 p.m.
 - Location: CAS County Conference Center Room 104, 601 N Ross St, Santa Ana, CA 92701
 - Service Provider Forum (IN PERSON): Thursday, August 17, 2024, from 9:00 a.m. – 11:00 a.m.
 - Location: Clifton C. Miller Community Center, 300 Centennial Way, Tustin, CA 92780
 - Domestic Violence Committee (IN PERSON): Tuesday, August 20, 2024, from 9:00 a.m. – 10:00 a.m.
 - Location: The Village at 17th Street Large Community Room, 1505 17th St, Santa Ana, CA 92705
- On July 22, 2024, HUD announced the release of the first-of-its-kind funding for new construction, acquisition, or rehabilitation of permanent supportive housing, called the CoCBUILDS NOFO. Funding of approximately \$175,000,000 is available through this NOFO and HUD expects to make approximately 25 awards from the funds available under this NOFO. Through the CoCBUILDS NOFO, HUD is encouraging CoCs to leverage funds provided for construction, acquisition, or rehabilitation

of new PSH units with other funding sources to maximize the amount of housing that can directed to meeting the needs of individuals and families experiencing homelessness. The CoCBuilds application is due on November 21, 2024.

- The CoC Vision Ad Hoc will begin convening this week to focus on completing the Orange County CoC Strategic Plan by the end of Calendar Year 2024. Please reach out to the Office of Care Coordination at CareCoordination@ocgov.com with the subject line "Vision Ad Hoc" if you have any questions.
- The California Victim Compensation Board (CalVCB) wants all CoCs to learn about the services CalVCB provides and have the opportunity to understand the application process. CalVCB invites case managers and advocates to learn more about CalVCB and how they can assist claimants throughout the application process, including applying for compensation and accessing benefits by attending one of the monthly webinars. Link to Register: [Register](#)
- On July 16th, 2024, HUD released a 30-Day Notice of Proposed Information Collection: Implementation of the Violence Against Women Reauthorization Act (VAWA) of 2013. HUD made modifications to several VAWA forms in response to public comment received as part of the 60-day notice-and-comment period in 2023. Emergency Solutions Grant (ESG) and CoC grantees are highly encouraged to submit comments. The deadline for comments is August 15, 2024.
- On July 5, 2024, HUD published a notice extending the compliance date for implementation of the National Standards for the Physical Inspection of Real Estate (NSPIRE) for CoC and ESG recipients and subrecipients and Housing Opportunities for Persons With AIDS (HOPWA) grantees to October 1, 2025. HUD intends to publish standards specific to each of the several Office of Community Planning and Development (CPD) programs before the compliance date.

Jason Phillips motioned to adjourn the meeting. Dawn Price seconded the motion. The motion passed with unanimous consent. Meeting adjourned at 3:59 p.m.

5. Next Meeting: Wednesday, August 28, 2024, from 2:00 p.m. – 5:00 p.m.

Date: August 28, 2024

Subject: Continuum of Care Builds (CoCBUILDS) Notice of Funding Opportunity (NOFO)

Recommended Actions:

- a. Authorize the Orange County CoC’s participation in the CoCBUILDS NOFO.
- b. Establish an Ad Hoc comprised of non-conflicted members to support the local competition process for the CoCBUILDS NOFO.
- c. Approve the issuance of a local competition process for the CoCBUILDS NOFO to provide Permanent Supportive Housing units in Orange County.
- d. Approve the recommended CoCBUILDS NOFO scoring criteria and funding priorities.

Background and Analysis

The U.S. Department of Housing and Urban Development (HUD) is making approximately \$175 million in funding available through the CoCBUILDS NOFO – a first-of-its-kind funding for new construction, acquisition, or rehabilitation of permanent supportive housing (PSH). Through one-time awards under the CoC program, the CoCBUILDS NOFO will enable communities to develop new units of rental housing with supportive services for people experiencing homelessness. The submission deadline for the CoCBUILDS NOFO is November 21, 2024, at 9:00 p.m. PDT.

The County of Orange’s Office of Care Coordination as the Collaborative Applicant for the Orange County CoC has identified this funding opportunity as important to support the ongoing efforts to continue developing housing opportunities and address and reduce the number of people experiencing homelessness. The Collaborative Applicant is seeking support from the Orange County CoC Board membership to apply for the opportunity. As described in Section III.D.2. of the CoCBUILDS NOFO, CoCs are required to review proposed CoCBUILDS applications locally and if more than one application is received, the CoC must determine which application it will submit to HUD. While only one project application per CoC may be submitted, where feasible, HUD encourages inclusion of one or more subrecipients that will contribute towards the goals of the NOFO (e.g., capital costs, housing, supportive services). Furthermore, the Collaborative Applicant is also seeking support from the Orange County CoC Board membership to establish an ad hoc comprised of non-conflicted members for the CoCBUILDS NOFO to review proposals and select a project that that will support the Orange County CoC in submitting a competitive application that could bring additional housing resources to Orange County.

Further details on the CoCBUILDS NOFO including the timeline, available funds, HUD’S Homeless Policy Priorities and application requirements can be found in **Attachment A**.

Local Competition Scoring Criteria and Funding Priorities

HUD has expressed awareness that the CoCBUILDS NOFO competition is happening concurrently with CoC Program NOFO competition, tasking Collaborative Applicants with aligning competition timelines to ensure

timely completion of both applications. Because of this, the Office of Care Coordination is seeking support from the CoC Board, as the Collaborative Applicant, to authorize the issuance of a local competition process and approve recommended funding priorities and scoring criteria to support with moving forward the application.

In the CoCBuils NOFO, HUD highlighted program-specific goals and objectives from HUD’s Strategic Plan, including policy priorities specific to the CoCBuils NOFO. In Section III.B. of the CoCBuils NOFO, the NOFO states that HUD encourages CoCs to use the scoring criteria outlined in Section V.A. of the NOFO to ensure the most viable application is submitted to HUD for review and scoring. Following the guidance in the NOFO by HUD, the Collaborative Applicant utilized the scoring criteria outlined in Section V.A. as a starting point and made minor adjustments to the scoring criteria. The adjustment that was made from HUD’s scoring criteria was the inclusion of the “Budget and Match” rating factor of 2 points to ensure proposed budgets are reasonable for the proposed project. As detailed above, the proposed CoCBuils Scoring Criteria includes criteria informed by the CoCBuils NOFO, as well as HUD’s emphasis on fortifying support for underserved communities and supporting equitable community development for all people. With the awareness that a variety of populations in Orange County need PSH resources, funding priorities will include the invitation for projects that serve individuals (adult only households) and/or families (households with at least one minor child and one adult), utilizing the proposal to convey how the project will fill a current unmet need for new units of PSH. The Collaborative Applicant recommends the approval of the CoCBuils NOFO Scoring Criteria to evaluate project proposals received in response to the CoCBuils NOFO.

Attachment B provides a detailed overview of scoring criteria, description of rating factors, and the maximum points available per rating factor.

Attachments

Attachment A – CoCBuils NOFO Overview

Attachment B – CoCBuils NOFO Scoring Criteria

Item 1. Attachment A

FY2024 Continuum of Care Builds Notice of Funding Opportunity Overview

Overview

The U.S. Department of Housing and Urban Development (HUD) is awarding \$175 million through the Continuum of Care (CoC) Builds (CoCBuils) Notice of Funding Opportunity (NOFO) – a first-of-its-kind funding for new construction, acquisition, or rehabilitation of permanent supportive housing (PSH).

Through one-time awards under the CoC program, the CoCBuils NOFO will enable communities to develop new units of rental housing with supportive services for people experiencing homelessness. The CoCBuils NOFO is available on [Grants.gov](https://www.grants.gov) and the [Funding Opportunities](#) page on HUD's website. The submission deadline for the CoCBuils NOFO is November 21, 2024, at 9:00 p.m. PDT.

Timeline:

- **Monday, July 22, 2024** – Funding opportunity announcement released by HUD
- **Thursday, November 21, 2024** – Application submission deadline

Available Funds:

- Approximately \$175,000,000 nationwide
- The maximum award amount under the CoCBuils NOFO is based on each CoC's Final Pro Rata Need (FPRN) for the FY 2024 CoC Competition, which is the higher of the CoC's Preliminary Pro Rata Need or Annual Renewal Demand. The maximum award amount for a single project may not exceed the maximum amount listed in the Maximum Amount for a Single Project column of the following chart.

FPRN Amount	Maximum Amount for a Single Project	Maximum Amount for Projects Submitted by CoCs with Units Located on Tribal Reservations or Trust Lands
\$40,000,000 and above	\$10,000,000	\$12,000,000
\$10,000,000 to \$39,999,999	\$7,500,000	\$9,500,000
CoCs that are the only CoC within their State or Territory	\$10,000,000	\$12,000,000

- The Orange County CoC is **eligible to apply for a maximum of \$7,500,000**

Eligible Applicants:

- CoC-designated Collaborative Applicants – County of Orange's Office of Care Coordination
- Eligible Project Applicants – State governments, County governments, City or township governments, Special district governments, Native American tribal governments (Federally recognized), Public housing authorities/Indian housing authorities, Native American tribal organizations (other than Federally recognized tribal governments), Nonprofits having a 501(c)(3) status with the IRS, other than institutions of higher education, and Others.

Item 1. Attachment A

Opportunities for New Funding:

For the CoCBUILDS NOFO, the following will be considered for funding:

- Permanent Housing – Permanent Supportive Housing (PH-PSH) which must include a capital costs budget for new construction, acquisition, or rehabilitation; and
- the application may also request no more than 20 percent of an award for CoC Program eligible activities and costs associated with such new PH-PSH projects (see Section IV.G.1 of the NOFO), and no more than 10 percent for administrative costs.

Criteria for Beneficiaries:

Eligible program participants (beneficiaries) are individuals and families experiencing homelessness outlined in 24 CFR 578.37(a)(1)(i) where at least one individual in the household has a disability.

- PSH for persons with disabilities: PSH can only provide assistance to individuals with disabilities and families in which one adult or child has a disability.

Other Program-specific Requirements

1. Project Applications:
 - a. must include capital costs for new construction, acquisition, or rehabilitation of new PSH units; and
 - b. may include costs for other eligible CoC Program Costs associated with the PSH project as outlined in Section IV.G.3 of the NOFO that are no more than 20 percent of the total budget requested (HUD will award no more than 20 percent of final award for non-capital costs eligible CoC activities associated with the PSH project); and
 - c. may include administrative costs of no more than 10 percent of the total amount requested for capital costs and, if included, eligible CoC Program costs outlined in Section IV.G.3 of the NOFO. HUD will award no more than 10 percent of final award for administrative costs associated with the PSH project).
2. Grant terms may be two, three, four, or five years. Projects selected for conditional award must be able to:
 - a. provide proof of site control (24 CFR 578.25) prior to execution of the grant agreement; and
 - b. execute the grant agreement with HUD no later than September 1, 2025. Additionally, projects selected for conditional award must:
 - c. have a completed environmental review before awarded funds can be drawn for project activities.; and
 - d. meet the timeliness standards outlined in 24 CFR 578.85 for new construction or rehabilitation activities. A grant term should be selected based on the type of capital costs and the realistic time frame for completion. Generally, rehabilitation and acquisition time frames are less than new construction.
3. A budget request may be included with the following eligible costs in the application. However, HUD will award no more than 20 percent of the total funds for use in project-based rental assistance, operating costs, or supportive services. Additionally, HUD will award no more than 10 percent of the total budget (capital costs plus additional eligible costs) for project administrative costs.
 - a. Acquisition (24 CFR 578.43);

Item 1. Attachment A

- b. Rehabilitation (24 CFR 578.45);
- c. New Construction (24 CFR 578.47);
- d. Project-based rental assistance (24 CFR 578.51(e));
- e. Supportive Services (24 CFR 578.53);
- f. Operating Costs (24 CFR 578.55); and
- g. Project administrative costs (24 CFR 578.59).

Application Process:

- CoC Application completed and submitted by CoC-designated Collaborative Applicant
 - HUD will conditionally select project applications based on application score using the following process:
 - Select the three highest scoring PSH projects that received 60 points or more where units will be located on Tribal reservations or trust lands.
 - Select the highest scoring eligible projects in states that have a population of 2,500,000 or less until a cumulative total of \$65,000,000 has been selected. For purposes of calculating the cumulative total of \$65,000,000, HUD will consider projects selected in paragraph a above if they are located in states that have a population of 2,500,000 or less.
 - Select the highest scoring projects remaining, regardless of the population of the state in which the project is located. If there are not enough eligible projects submitted as outlined in subparagraph b, the remaining amount will be added to this amount.

Application Requirements:

Forms/Assurances/Certifications
Application for Federal Assistance (SF-424)
Applicant and Recipient Assurances and Certifications (HUD 424-B)
Applicant/Recipient Disclosure/Update Report (HUD 2880)
Disclosure of Lobbying Activities (SF-LLL)
Certification Regarding Lobbying Activities
Grant Application Detailed Budget Worksheet (HUD-424-CBW)
Assurances for Non-Construction Programs (SF-424B)
Assurances for Construction Programs (SF-424D)

Complete applications must also attach:

- Form HUD-2991, Certification of Consistency with the Consolidated Plan
- Narrative responses to the following equity requirements as outlined in Section III.F: Advancing Racial Equity, Affirmative Marketing and Outreach, and Affirmatively Furthering Fair Housing.

Item 1. Attachment A

- CoC Board President Letter: The CoC must include a letter signed by the CoC Board President stating the CoC supports the submission of the selected application. The letter must include the:
 - CoC Number and Name;
 - name of the applicant organization;
 - name of the project; and
 - amount of funds that are requested.
- Letters of commitment, contracts, or other formal written documents: Documentation that demonstrate coordination with Housing Providers, Healthcare Organizations, and Social Service Providers (Provide at least 50 percent of the amount being requested in the application or provide subsidies for at least 25 percent of the units that are proposed in the application with non-CoC funded)

HUD's Goals for the Competition

1. Increase housing opportunities for people with high risk of levels of need.
2. Increase the supply of permanent supportive housing units within CoC geographic areas to address individuals and families experiencing homelessness where one member of the household has a disability.
3. Encourage coordination between housing providers, health care organizations, and social service providers.
4. Ensure access to resources for projects to expand opportunities for new PSH units in States with populations less than 2.5 million.
5. Ensure new PSH units are conveniently located near local services, e.g., walking distance, near reliable transportation services, provide access to telehealth.
6. Affirmatively further fair housing by addressing barriers which perpetuate segregation, hinder access to areas of opportunity for protected class groups and concentrate affordable housing in under-resourced areas.

HUD's Strategic Plan Goals and Objectives

Strategic Goal 1: Support Underserved Communities

Fortify support for underserved communities and support equitable community development for all people.

1B: Reduce Homelessness

Strengthen Federal, State, Tribal, and community implementation of the Housing First approach to reducing the prevalence of homelessness, with the ultimate goal of ending homelessness.

Strategic Goal 2: Ensure Access to and Increase the Production of Affordable Housing

Ensure housing demand is matched by adequate production of new homes and equitable access to housing opportunities for all people.

2A: Increase the Supply of Housing

Enhance HUD's programs that increase the production and supply of housing across the country.

Strategic Goal 4: Advance Sustainable Communities

Advance sustainable communities by strengthening climate resilience and energy efficiency, promoting environmental justice, and recognizing housing's role as essential to health.

4B: Strengthen Environmental Justice

Item 1. Attachment A

Reduce exposure to health risks, environmental hazards, and substandard housing, especially for low-income households and communities of color.

4C: Integrate Health and Housing

Advance policies that recognize housing's role as essential to health.

HUD's Homeless Policy Priorities

The following policy priorities are specific to the NOFO:

- *Increasing Affordable Housing Supply.* The lack of affordable housing is the main driver of homelessness. The NOFO provides funding for new construction, rehabilitation, or acquisition that can increase permanent supportive housing stock in a CoC's geographic area. CoCs, applicants, and developers should partner to determine an economical way to increase permanent supportive housing supply for individuals and families experiencing homelessness that considers adaptive reuse and conversion of hotel properties. Additionally, CoCs and applicants should engage local leaders to mitigate zoning and land use issues that may impact adding permanent supportive housing units to the CoC's housing stock.
- *Ensuring Access to Supportive Services and Public Services.* Providing voluntary supportive services to individuals and families experiencing homelessness, particularly for these households that also include a family member who has a disability, can ensure the households have the tools and resources needed to successfully maintain permanent housing. Applicants must ensure households that will reside in the units developed under the NOFO will have access to CoC Program supportive services as well as other public services such as easy access to local parks and recreation, post office, etc. Additionally, applicants proposing projects in rural areas are encouraged to consider the most cost-effective method for supportive services delivery (e.g., use of internet for check-ins with program participants) and access to public services.
- *Partnering with Housing, Health, and Service Agencies.* Using cost performance and outcome data, applicants should improve how all available resources are utilized to end homelessness. This is especially important as the CARES Act and American Rescue Plan have provided significant new resources to help end homelessness. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness.
 - Work closely with public and private healthcare organizations and assist program participants who are interested in assistance with receiving primary care, housing related services, and with obtaining medical insurance to address healthcare needs. This includes developing close partnerships with public health agencies to analyze data and design approaches that reduce homelessness, improve the health of people experiencing homelessness, and prevent and address disease outbreaks, including HIV/AIDS.
 - Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing subsidies to people experiencing homelessness. These partnerships can also help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options. CoCs and PHAs should especially work together to implement targeted programs such as Emergency Housing Vouchers, HUD-VASH, Mainstream Vouchers, Family Unification Program (FUP) Vouchers, and other housing voucher programs targeted to people experiencing homelessness. CoCs should coordinate with their state and local housing agencies on the utilization of new program resources provided through the

Item 1. Attachment A

HOME Investment Partnerships - American Rescue Plan Program (HOME-ARP) that was created through the American Rescue Plan.

- Partner with local workforce development centers to improve employment opportunities.
- Work with Tribes and Tribal organizations to ensure that Tribal members can access CoC funded assistance when a CoC's geographic area borders a Tribal area.

Changes from Previous NOFO:

- This is the first CoCBuils NOFO; therefore, no changes from a previous NOFO.

HUD Funding Process – Application Review and Selection Process:

- CoCs are required to review proposed CoCBuils applications locally and if more than one application is received, the CoC must determine which application it will submit to HUD. While only one project application per CoC may be submitted, where feasible, HUD encourages inclusion of one or more subrecipients that will contribute towards the goals of the NOFO (e.g., capital costs, housing, supportive services).
- CoCs are permitted to submit a second application if the new PSH units are constructed, rehabilitated, or acquired on Tribal reservations or trust lands.
- HUD encourages CoCs to use scoring criteria outlined in Section V.A of the NOFO to ensure it submits the most viable application to HUD for review and scoring.

Continuum of Care Builds (CoCBUILDS) Notice of Funding Opportunity (NOFO) Scoring Criteria

Agency Name:

Name of Project:

All proposed Permanent Supportive Housing (PSH) projects will be scored on a 100-point scale using the following criteria:

Rating Factor	Description of Basis for Assigning Points	Points
Development Experience and Leveraging	<ul style="list-style-type: none"> • Demonstrated experience with at least four other projects that have a similar scope and scale as the proposed project (up to 8 points) • Demonstrated experience leveraging resources substantially similar to the funds being proposed in the project (up to 8 points) • Provided information regarding the availability of low-income housing tax credit commitments, project-based rental assistance, and other resources dedicated to the proposed project (up to 8 points) 	24
Managing Homeless Projects	<ul style="list-style-type: none"> • Demonstrated experience administering programs for individuals and families experiencing homelessness where at least one member of the household has a disability, including: <ul style="list-style-type: none"> ○ Experience managing at least 4 properties (up to 8 points) ○ Type and frequency of supportive services that will be available (up to 3 points) ○ Providing transportation for program participants (1 point) 	12
Implementation Schedule	<ul style="list-style-type: none"> • Completed an implementation schedule based on the proposed project. Based on type of capital cost requested, applicant provided: <ul style="list-style-type: none"> ○ If New Construction cost - dates regarding construction ○ If Acquisition cost - date property will be required ○ If Rehabilitation cost - or dates rehabilitation of the property will begin and end • Provided the proposed schedule for activities such as <ul style="list-style-type: none"> ○ site control ○ environmental review completion ○ execution of grant agreement ○ start and completion dates ○ anticipated date the jurisdiction will issue the occupancy certificate ○ and date property will be available for individuals and families experiencing homelessness to begin occupying units • Proposed project implementation schedule will likely ready the project for occupancy within 36 months of funding award 	12
Property Maintenance	<ul style="list-style-type: none"> • Demonstrated how the property will be maintained annually to prevent unnecessary costly repairs, including: <ul style="list-style-type: none"> ○ how the property will be maintained annually and needed repairs are conducted ○ the source of funds that will be used and whether there will be a reserve fund established specifically for maintenance and repair of proposed units ○ how the project will be able to cover replacement costs 	5

Unmet Housing Need	<ul style="list-style-type: none"> • Described the population that will be served by the proposed project and the level of unmet need for new units of PSH in Orange County • Using the Point In Time (PIT) Count and Housing Inventory Count (HIC) information, applicant provided justification that the proposed project will fulfill a current unmet housing need for the CoC. 	<p style="text-align: center;">5</p>
Budget and Match	<ul style="list-style-type: none"> • Budget is reasonable for the proposed project, total number of units and participants to be served is clearly articulated • Applicant can provide the required match of at least 25% is included and documented • Applicant can demonstrate how leverage housing resources and/or health care resources contribute to the overall budget of the project proposed 	<p style="text-align: center;">2</p>
Management of Rental Housing	<ul style="list-style-type: none"> • Describe the rental housing projects the agency has managed, including: <ul style="list-style-type: none"> ○ the number of grants for affordable housing awarded over the last three years, total amount of awards, and the type of subsidy funding or financing provided for housing ○ the number of assisted and non-assisted units in each property listed 	<p style="text-align: center;">10</p>
Coordinated Entry	<ul style="list-style-type: none"> • Described how the project will participate in the Orange County CoC’s Coordinated Entry System, or in the case of victim service providers, another coordinated entry process that meets U.S Department of Housing and Urban Development (HUD)’s minimum requirements, to refer individuals and families experiencing homelessness to the new units of the proposed project 	<p style="text-align: center;">3</p>
Coordination with Housing Providers, Healthcare Organizations, and Social Service Providers	<ul style="list-style-type: none"> • Leverage Housing Resources (5 points) – Project demonstrates either: <ul style="list-style-type: none"> ○ leveraging of non-CoC funded housing resources through coordination with housing providers, healthcare organizations, and social service providers for new construction, acquisition, and rehabilitation to provide at least 50 percent of the amount being requested in the application, or ○ leveraging of non-CoC funded housing resources to provide subsidies for at least 25 percent of the units that are proposed in the application • Leveraging Healthcare Resources (5 points) – Project demonstrates through written commitment from a healthcare organization, housing provider, and/or social service provider: <ul style="list-style-type: none"> ○ Access to housing resources (e.g., supportive services, home-based and long-term services and supports, primary and medical care, behavioral health, substance use disorder treatment and recovery, and other services); or ○ The value of assistance being provided is at least an amount that is equivalent to at least \$7,500 per unit included in the proposed project. <p>Full points will be given to projects that attach letters of commitment, contracts, or other formal written documents that demonstrate the percentage of subsidies or number of units being provided to support the project and ensure in-kind resources are valued at the local rates consistent with the amount paid for services not supported by grant funds.</p>	<p style="text-align: center;">10</p>

Experience Promoting Racial Equity	<ul style="list-style-type: none"> • Demonstrated: <ul style="list-style-type: none"> ○ experience soliciting, obtaining, and applying input from underserved communities when designing, planning, and implementing housing projects ○ experience building community partnerships with grassroots and resident-led organizations that provide housing, health care, and supportive services ○ experience designing or operating programs that have improved racial equity, particularly among people experiencing homelessness • Described any potential barriers to persons or communities of color equitably benefiting from the proposed project and detail the steps taken to prevent, reduce, or eliminate these barriers 	8
Community Integration for Persons with Disabilities	<ul style="list-style-type: none"> • Described how the proposed project will support persons with disabilities participating in the program to make meaningful choices about their housing, health care, and long-term services and supports that will allow them to fully participate in the community • Described how the units will ensure non-segregation of individuals and families experiencing homelessness where at least one household member has a disability • Described whether the units will be part of mixed-use development, meaning individuals and families that will reside in the units are not all disabled 	7
Section 3 Requirement	<ul style="list-style-type: none"> • Described the actions that will be taken to comply with Section 3¹ of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (Section 3) and HUD’s implementing rules at 24 CFR part 75² to provide employment and training opportunities for low- and very low-income persons, as well as contracting and other economic opportunities for business that provide economic opportunities to low- and very low-income persons 	2
Total Points Possible		100

¹ The Section 3 program requirements are included on the HUD Exchange website: <https://www.hudexchange.info/programs/section-3/>

² The regulations for Section 3 are included in 24 CFR Part 75: <https://www.ecfr.gov/current/title-24/subtitle-A/part-75>

Date: August 28, 2024

Subject: 2024 Continuum of Care (CoC) Nominating Ad Hoc

Recommended Action:

- a. Establish the 2024 CoC Nominating Ad Hoc to support the Nomination and Election for the CoC Board, including the review of the CoC Board composition, qualifications and nomination and election process detailed within the CoC Governance Charter.

Background and Analysis

Each year, the Orange County CoC Board establishes a CoC Nominating Ad Hoc to support the annual review of the Orange County CoC Governance Charter (Charter) and facilitate the CoC Board selection process for the CoC Board seats expiring in December. As part of the 2023 CoC Board nomination and selection process, the Office of Care Coordination and CoC Board leadership partnered with a technical assistance provider through the California Interagency Council on Homelessness Racial Equity Action Lab (CA REAL) with a goal to align with recommendations from the C4 Innovations racial equity assessment of the Orange County CoC and increase diversity and representation within the CoC Board. At the October 25, 2023, meeting, the CoC Board Ad Hoc recommended revisions to the Charter including: changing total number of CoC Board seats from 19 to an odd number between 17 and 21 and removing designated seats and replacing with a minimum number of Board members who have specified identities, experiences, and backgrounds. The 2023 CoC Nominating Ad Hoc identified the ability to meet all minimum requirements in the 2023 election cycle, even though the Charter provided benchmarks for building a more representative CoC Board membership through two election cycles by January 2025. The 2024 CoC Nominating Ad Hoc will be tasked with carrying forward the work of ensuring the CoC Board membership is diverse and representative in the nomination and selection process for the upcoming Board election.

On August 15, 2024, the Office of Care Coordination, on behalf of the Orange County CoC, announced the recruitment of the 2024 CoC Nominating Ad Hoc membership through the CoC email distribution list. Individuals interested in participating are invited to submit an interest form via SurveyMonkey by August 29, 2024. The Office of Care Coordination will work with the CoC Board leadership to select the CoC Nominating Ad Hoc, ensuring diverse and representative membership, then convene the CoC Nominating Ad Hoc beginning in September 2024.

As detailed in the Charter, the timeline below notes the associated activities of the annual CoC Board Election process.

Months	Timeline Tasks
August/September	CoC Board Chair appoints Nominating Ad Hoc
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.

October/November	Nominating Ad Hoc outreaches to potential CoC Board candidates. The Nominating Ad Hoc will interview eligible CoC Board candidates who meet criteria.
November/December	Candidates who moved forward based on their interview are presented to the CoC General Membership for voting/election.
December	CoC Board ratifies slate of elected candidates by the CoC General membership.
January	CoC Board seating takes place. Outgoing CoC Board and Board staff will provide training and orientation for incoming CoC Board.

The establishment of a 2024 CoC Nominating Ad Hoc will support the Office of Care Coordination in ensuring the for the CoC Governance Charter is compliant with United States Department of Housing and Urban Development (HUD) and Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) regulations, proposing recommended updates to the CoC Board composition and nomination and selection process, and nominating and recommending candidates for ratification to the CoC Board in December 2024.

Date: August 28, 2024

Subject: Policies, Procedures and Standards (PPS) Committee Recommendations

Recommended Actions:

- a. Approve the recommended changes to the Homeless Information Management System (HMIS) Policies and Procedures inclusive of the HMIS Client Consent Form, as recommended by the PPS Committee and HMIS Policies and Procedures Working Group.
- b. Approve the updated CES Housing Assessment, including the addition of housing opportunities descriptions and revisions to the Accessibility Needs section, as recommended by the PPS Committee and CES Steering Committee.

Background and Analysis

HMIS Policies and Procedures

Per guidance from the CoC Board, the HMIS Policies and Procedures is reviewed and updated on an annual basis. 2-1-1 Orange County (211OC), a key service of Orange County United Way, is the HMIS Lead for the Orange County Continuum of Care (CoC) and convened the HMIS Working Group to propose revisions to the HMIS Policies and Procedures. The HMIS Policies and Procedures Working Group (Working Group) met four times from January through March 2024 and was comprised of representatives from Last is First Philanthropies, PATH, Pathways of Hope, Salvation Army Orange County, U.S. Veterans Initiative, Families Forward, Family Assistance Ministries, Mental Health Association and Mercy House. During the review process, the Working Group reviewed the HMIS Policies and Procedures in its entirety, as well as privacy and security forms, and proposed changes to the documents. In addition, the HMIS Lead provided feedback previously received from the CoC Board, Committees and CoC general members, inclusive of scenarios that prompted consideration of potential HMIS policy or procedural changes needed.

The HMIS Lead collected feedback from the Policies, Procedures, and Standards (PPS) Committee, the Lived Experience Advisory Committee, and the HMIS Users during the review process. At the PPS Committee meeting on February 13, 2024, the HMIS Lead provided an update on the review of the HMIS Policies and Procedures, inclusive of potential changes being considered, and received some initial feedback from the PPS Committee members. The HMIS Lead also hosted a listening session and released a survey to collect feedback from HMIS Users on the Agency Access policy within the HMIS Policies and Procedures, as requests for HMIS access have continued to garner discussion amongst the decision-makers and HMIS Users in the Orange County CoC. Recommended changes to the HMIS Policies and Procedures and HMIS Client Consent form were presented to the Lived Experience Advisory Committee on June 5, 2024. Feedback was then collected and used to draft an updated HMIS Policies and Procedures which was emailed to HMIS Users on June 6, 2024, inviting feedback on the proposed updates to be submitted by end of day Friday, June 14, 2024 to the OC HMIS Help Desk. The email was also sent by the Office of Care Coordination to the CoC distribution list. All feedback was considered, and appropriate updates were made to the HMIS Policies and Procedures.

The final draft of the HMIS Policies and Procedures, inclusive of the HMIS Client Consent Form, was presented to PPS Committee on July 31, 2024. The PPS Committee had further discussion and feedback on the item, and recommended the HMIS Policies and Procedures, inclusive of the HMIS Client Consent form to be reviewed and approved by the CoC Board with direction to the HMIS Lead to provide further detail on the Data Release and Data Integration sections, and additional research on the Client Record Request section. A summary of all feedback received throughout the review process of the HMIS Policies and Procedures and Client Consent Form can be referenced in **Attachment A**.

As a follow up to the PPS Committee's recommendation, the HMIS Lead reviewed the HMIS Policies and Procedures for several CoCs regarding their policy for client record requests. A summary of the findings is below.

- Three CoCs (Long Beach, Riverside, Bakersfield/Kern County) do not appear to have any policy on whether or not a client can review any of their data in HMIS.
- The LA Collaborative (Los Angeles, Glendale, and Pasadena) only allows clients to review their Universal Data Elements in HMIS, which excludes case notes.
- The Policies and Procedures for the San Bernadino CoC states that a client can review their client record but did not include a description of what's included in the client record. When asked, they stated that they don't have a policy in place addressing client record requests and it seems currently nothing is being enforced related to client record requests.
- The San Diego CoC allows clients to review data that the client provided to the agency they are requesting the record from, like Universal and Program Specific Data Elements, for the purposes of reviewing and correcting their data. They do not allow clients to review case notes because the information was not provided by the client.
- None of the CoCs reviewed allow clients to review their case notes.

The HMIS Lead also submitted a ticket to the U.S. Department of Housing and Urban Development (HUD) for guidance on what HMIS data fields can or should be included in response to a client record request. HUD allows for each CoC to set the policy regarding what is disclosed in response to a client record request. Considering the results of the research and the current reporting capabilities of HMIS, the HMIS Lead recommends Client Record Requests include data in the Client Record Request dashboard. The dashboard includes the Client Profile screen, Release of Information data, history of enrollments in HMIS, and all documents uploaded into HMIS on the client's behalf. Utilizing the Client Record Request Dashboard ensures that clients receive the same level of access to their data regardless of the agency they choose to request their record from. The HMIS Lead is exploring other reporting solutions to include enrollment and exit questions in the Client Record Request Dashboard. This policy will be revisited when a reporting solution has been found.

Significant Proposed Changes to the HMIS Policies and Procedures and Consent Form

The HMIS Lead considered all feedback received, and revised HMIS Policies and Procedures, which can be referenced in **Attachment B**. Additionally, feedback was received to amend the HMIS Client Consent Form, which is included in **Attachment C**. Significant changes to both documents are highlighted below.

Revised: Agency Access Policy

- Victim Service Providers receiving CoC Program funds or Emergency Solutions Grants (ESG) Program funds may request up to five licenses for read-only access in HMIS for the purpose of care coordination.

- Organizations that are required to submit the Agency Access Application will be required to complete an online course to understand HMIS requirements.
- Agencies approved for access must begin entering data into HMIS within 90 days of approval.
- Agency Access Working Group Qualifications: Must have the availability to commit to serve a minimum term of one year.

Revised: Agency Audit Policy

- Agencies that are unresponsive to scheduling their audit will fail the audit for that year.
- If deficiencies found during the audit are not resolved by the date agreed upon by the agency and the HMIS Lead, the agency will fail the audit for that year.
- Agencies that fail their audit will be reviewed by the HMIS Agency Access Working Group to determine the appropriateness of the agency’s continued participation in the OC HMIS, and the agency may have HMIS Access revoked.
- Agencies that pass their HMIS Annual Audit will be recognized on the OC HMIS Website

New: Remote Work Policy

- Added policy language to provide guidance on protecting client data while working remotely.

Revised: Client Record Request Policy

- Clients will be provided the Client Record Request Dashboard, which includes the Client Profile screen, Release of Information data, history of program enrollments in HMIS and all documents uploaded into HMIS on the client’s behalf.

Revised: Client Consent Form

- Replaced “entity” with “Service Provider/Organization”.

Approval of the revisions to the HMIS Policies and Procedures, inclusive of the proposed changes to the HMIS Client Consent Form, will support the Orange County CoC with the ongoing operations and management of the HMIS. Additionally, it will provide the needed guidance and support to the HMIS Lead to operate HMIS.

CES Housing Assessment

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 on the CES Housing Assessment. 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.

At the May 14, 2024, meeting of the PPS Committee, the PPS Committee reviewed and discussed the recommended revisions to the CES Housing Assessment. The PPS Committee shared that the updated housing interest options descriptions within the CES Housing Assessment would benefit from additional review at the CES Steering Committee before being recommended to the CoC Board for approval. To ensure questions related to accessibility were elevated as a priority, the PPS Committee recommended the addition of accessibility questions to proceed for approval as part of the revised CES Housing Assessment. The revised CES Housing Assessment with the addition of accessibility questions was presented to the CoC Board for approval, noting that additional revisions related to the housing descriptions would be further discussed with the CES Steering Committee.

The Office of Care Coordination brought the feedback from the PPS Committee on the housing descriptions portion of the CES Housing Assessment to the CES Steering Committee at the July 3, 2024, meeting. The CES Steering Committee provided feedback that it would be helpful to have a table that compares the different housing opportunity descriptions with a breakdown of rental assistance, supportive services, income/financial contributions needed, and overall goal of each housing type. Since the assessment is primarily accessed within the Homeless Management Information System (HMIS), the Office of Care Coordination partnered with the HMIS Lead, Orange County United Way's 2-1-1 Orange County (211OC) to explore if the table option would align with the functionality of Clarity, the HMIS platform. Unfortunately, a table format is not offered within Clarity. Alternatively, the Office of Care Coordination used feedback received on the housing descriptions to provide a more detailed breakdown that would have been included in a table format.

On July 31, 2024, the PPS Committee recommended the revised CES Housing Assessment including the addition of housing opportunity descriptions, with additional minor revisions to the Housing Interest and Accessibility Needs sections, for approval by the CoC Board. Feedback received from the PPS Committee members was incorporated into the revised CES Housing Assessment and can be referenced in **Attachment E**. The CoC Board is being asked to approve the revised CES Housing Assessment to support a more informed and supportive assessment process for frontline staff, CES Administrators, and people receiving services as consumers.

Attachments

- Attachment A – HMIS Policies and Procedures Feedback Received
- Attachment B – Revised Orange County HMIS Policies and Procedures
- Attachment C – Revised Orange County HMIS Client Consent Form
- Attachment D – Summary of Proposed Changes to the Orange County HMIS Policies and Procedures
- Attachment E – CES Housing Assessment – Redline Version
- Attachment F – CES Housing Assessment – Clean Version
- Attachment G – CES Housing Assessment Feedback Received

Item 3. Attachment A

Homeless Management Information System (HMIS) Policies and Procedures Feedback Received

The following summarized feedback was received from CoC Committees, the HMIS Policies and Procedures Working Group, and targeted listening sessions.

Feedback from the PPS Committee (February meeting)

- Provide more information regarding why user fees are charged
- Consider removing as many barriers as possible to allow more agencies to participate in HMIS
- Include a schedule of required reports
- Consider the Minimum Participation Requirements policy and whether read-only access should be allowed
- Implement policies to enhance data quality and completeness

Feedback from the Working Group

- Develop training for new agencies joining HMIS
- Minimum term commitment to participate in the Agency Access Working Group
- Highlight agencies on the HMIS website that pass the agency audit on the first attempt
- Develop policy for agencies unresponsive to audits
- Agencies approved for HMIS access have 90 days to begin participating in HMIS

Feedback from the Agency Access Listening Session and Survey

- 64% of participants (28 participants) in the survey said that all agencies participating in HMIS should be required to contribute data. Below are the reasons participants provided this response:
 - Allowing read only access to additional agencies may increase the number of clients that revoke their consent to share their data in HMIS.
 - Agencies need to contribute data to HMIS to coordinate care for the client and prevent duplication of services.
 - Agencies with read only access may not have the appropriate context that could cause improper care for the client.
- 36% of participants (16 participants) in the survey said that some agencies should be given read only access. Of these 16 participants, all of them said that Victim Service Providers should be given read-only access to HMIS for care coordination, and 14 of these participants said Medical Providers should be given read only access. Below are the reasons participants provided these responses:
 - Allows agencies to assess gaps in services and connect clients with other resources.
 - Survivor Coordinated Entry System (CES) has been implemented, so being able to see client history in HMIS will help with care coordination.

Feedback from the Lived Experience Advisory Committee

- Agencies unresponsive to scheduling the audits should be required to pay an additional fee
- Committee originally recommended to change the term “entity” on the Consent to Share Protected Information form. The working group proposed changing the wording to “Service Provider/Organization”. Some participants thought “administrator of care” would be better, but some thought that term was less accessible.
- Agencies serving homeless clients should be required to participate in HMIS.

Item 3. Attachment A

Feedback from the PPS Committee (July meeting)

- When agencies that passed the agency audit are published on the OC HMIS website, the number and percentage of agencies that passed the audit on the first vs. second attempt should also be included.
- In the Policies and Procedures draft shared with the PPS Committee, the Client Record Request section included a new policy that case notes would not be shared with the client. The PPS Committee discussed this policy and felt more research should be done regarding what information a client is entitled to review from their client record in HMIS. The PPS Committee approved the draft to be presented to the CoC Board with the request that the results of the research would be considered and implemented in the final Policies and Procedures.

Orange County HMIS Policies and Procedures

AUGUST 2024

Orange County United Way/2-1-1 Orange County
WWW.OCHMIS.ORG | WWW.UNITEDWAYOC.ORG | WWW.211OC.ORG

Item 3. Attachment B

Orange County HMIS Policies and Procedures

Table of Contents

Key Terms and Acronyms.....	2
Orange County United Way: HMIS Lead Agency.....	9
I. Background & Purpose	9
II. Policies and Procedures Summary	10
III. HMIS Lead Agency Responsibilities.....	11
IV. Help Desk Policies.....	11
V. Agency Access.....	12
VI. Participating Agency Requirements	14
VII. Agreements and Certifications.....	17
VIII. HMIS User Access Roles.....	18
IX. HMIS User Requirements	18
X. Agency Administrator Requirements	19
XI. Technical Standards.....	21
XII. Privacy.....	22
XIII. Data Use and Disclosure.....	25
XIV. Data Release	25
XV. Data Breach.....	27
XVI. Data Integration	28

Item 3. Attachment B

Orange County HMIS Policies and Procedures

Key Terms and Acronyms

All documents referenced in the HMIS Policies and Procedures can be found on the HMIS Documents page of the OC HMIS Information website unless otherwise noted.

Term	Acronym (if applicable)	Definition
Orange County United Way/2-1-1 Orange County	OCUW/211OC	Homeless Management Information System (HMIS) Lead Agency for Orange County Continuum of Care (CoC)
Agency Administrator	AA	The HMIS User designated by their agency to serve as Agency Administrator is responsible for training new HMIS Users and overseeing data quality management, among other duties described in the Policies and Procedures
Agency Agreement		The agreement form between OC HMIS participating agencies and the HMIS Lead Agency that specifies the rights and responsibilities of each party regarding the use of HMIS.
Annual Homeless Assessment Report	AHAR	The AHAR is a national-level report that provides information about homeless service providers, people and households experiencing homelessness, and various characteristics of that population. It informs strategic planning for federal, state, and local initiatives designed to prevent and end homelessness. The AHAR is submitted to Congress on an annual basis.
Chronically Homeless	CH	<p>In order to be eligible for housing restricted to chronically homeless individuals or families under the CoC program, participants must meet the definition of chronically homeless. The definition of chronically homeless is:</p> <ul style="list-style-type: none"> • A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who: <ul style="list-style-type: none"> ○ Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and ○ Has been homeless and living as described for at least 12 months* or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described. • An individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility**; or • A family with an adult head of household (or, if there is no adult in the family, a minor head of household) who meets all of the criteria of this definition, including a family whose

Item 3. Attachment B

Orange County HMIS Policies and Procedures

		composition has fluctuated while the head of household has been homeless.
Client Identifying Information	CII	Client Identifying Information, also known as Personal Protected Information (PPI), is a category of sensitive information that is associated with an individual person. This information should be accessed only on a strict need-to-know basis, handled and stored with care. This category includes but is not limited to: First names, last names, dates of birth, and Social Security Numbers.
Continuum of Care	CoC	The Continuum of Care is a collection of nonprofits and agencies that come together to promote community wide commitment to the goal of ending homelessness; promote access to and affect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.
Continuum of Care Board	CoC Board	The Orange County Continuum of Care Board is the governing body for the Orange County CoC. They are committed to the goal of ending homelessness and are organized to carry out the responsibilities required under the CoC Program regulations, 24 CFR Part 578.
Continuum of Care Collaborative Applicant	CoC Collaborative Applicant	The Orange County CoC designated the County of Orange as the Collaborative Applicant. The CoC Collaborative Applicant is tasked with coordinating the development of the CoC system, its planning, and supporting the various functions and activities as required by the HEARTH Act.
Continuum of Care Program	CoC Program	The CoC Program is designed to assist individuals (including unaccompanied youth) and families experiencing homelessness and to provide the services needed to help such individuals move into transitional and permanent housing, with the goal of long-term stability. More broadly, the program is designed to promote community-wide planning and strategic use of resources to address homelessness; improve coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness; improve data collection and performance measurement; and allow each community to tailor its program to the particular strengths and challenges within that community.
Coordinated Entry System	CES	A project that administers the continuum's centralized or coordinated process to coordinate assessment and referral of individuals and families seeking housing or services, including the use of a comprehensive and standardized assessment tool.
Coverage Rate		Coverage rate refers to the percentage of beds targeted to serve homeless clients in a geographic area that are captured in the Homeless Management Information System (HMIS) divided by the total number of beds targeted to serve homeless clients in the geographic area (excluding beds targeted to serve domestic violence clients). Coverage rate estimates are used to project a total homeless count if there are homeless service providers in the jurisdiction that do not participate in HMIS.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

Day Shelter	DS	A project that offers daytime facilities and services (no overnight lodging) for persons who are experiencing homelessness.
Department of Health and Human Services	HHS	The U.S. Department of Health and Human Services (HHS), also known as the Health Department, is a cabinet-level department of the U.S. Federal government. The Health Department's goal is to protect the health of all Americans and provide essential human services.
Department of Housing and Urban Development	HUD	The U.S. Department of Housing and Urban Development (HUD) is a Cabinet department in the Executive branch of the US. Federal government. HUD's goal is to create strong, sustainable, inclusive communities and quality affordable homes for all.
Emergency Shelter – Entry Exit	ES - EE	A project that offers temporary shelter (lodging) for people experiencing homelessness in general or for specific populations of people experiencing homelessness. Requirements and limitations may vary by program and will be specified by the funder. The EE shelter project type should be used for all shelters that collect Universal Data Elements (UDEs) and certain Program-Specific Data Elements (PSDEs) at project start and project exit, including projects that require or strongly encourage a continuous stay while a client resolves their experience of homelessness. In EE shelters, length of stay is calculated based on the number of nights between project start and project exit, and performance measures will include changes from project start and project exit Data Collection Stages.
Emergency Shelter – Night-by-Night	ES - NbN	The NbN emergency shelter type may be used by some high-volume shelters and shelters where a significant proportion of clients spend a night at the shelter as needed on an irregular basis. This project type relies on creating a separate record of each individual date on which a client is present in the shelter as a means for calculating length of stay and implies that the emergency shelter is generally unable to collect as much client data at project exit as an EE emergency shelter for tracking utilization. In NbN shelter:(1) entry information is collected the first time that a client stays at the shelter (2) the project records every discrete date (or series of dates) that the client resides in the shelter; (3) the HMIS maintains historical data on the nights a client is sheltered; (4) the client may be exited when shelter staff has information that indicates that the client is unlikely to return to the shelter or the system may be designed to automatically generate an exit (dating back to the day after the last bed night) after an extended absence; and (5) for reporting purposes, a client's length of stay in the project will be based on the actual number of bed nights and not on the period of time from entry to exit.
Emergency Solutions Grants Program	ESG	The ESG program provides funding to: <ul style="list-style-type: none"> • Engage homeless individuals and families living on the street; • Improve the number and quality of emergency shelters for homeless individuals and families; • Help operate these shelters; • Provide essential services to shelter residents; • Rapidly re-house homeless individuals and families; and

Item 3. Attachment B

Orange County HMIS Policies and Procedures

		<ul style="list-style-type: none"> Prevent families and individuals from becoming homeless.
Health Insurance Portability and Accountability Act of 1996	HIPAA	The Health Insurance Portability and Accountability Act of 1996, particularly the Privacy Rule under Title II, regulates the use and disclosure of Protected Health Information (PHI) held by covered entities and business associates. HIPAA is the base operational privacy rule on which the Orange County HMIS privacy rule is structured.
HMIS Lead Agency		The HMIS Lead Agency is an agency, organization, or government department designated by the CoC Board to administer and manage the HMIS for the CoC jurisdiction.
Homeless Management Information System	HMIS	A data system that meets U.S. Department of Housing and Urban Development's requirements and is used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. The HMIS is also the primary reporting tool for HUD homeless service grants as well as for other Federal, State and local government streams of funding related to homelessness. HMIS data is used to better inform homeless policy and analyze program and system impact in addressing homelessness.
Homelessness Prevention	HP	A project that offers services and/or financial assistance necessary to prevent individuals and families from experiencing homelessness, including moving into an emergency shelter or place not meant for human habitation.
Housing Inventory Count	HIC	The Housing Inventory Count (HIC) is a point-in-time inventory of housing programs within a CoC that provide beds and units dedicated to serve people experiencing homelessness (or for permanent housing projects, were experiencing homelessness at entry). The project types included in the HIC are Emergency Shelter, Transitional Housing, Rapid Re-housing, Safe Haven, and Permanent Supportive Housing. The US Department of Housing and Urban Development (HUD) requires the submission of the HIC on an annual basis.
Housing Opportunities for Persons with AIDS Program	HOPWA	HOPWA provides housing assistance and related supportive services for persons with HIV/AIDS, and family members who are homeless or at risk of homelessness. This project has different project reporting requirements than the other HUD funded projects described in the Policies and Procedures.
Interagency Data Sharing Consent Form		Allows client-level data and enrollment data to be shared among OC HMIS Participating Agencies. HOPWA funded projects are exempt from the data sharing mandate due to privacy laws protecting clients' HIV status.
Length of Stay	LOS	The number of days between the beginning of services and the end of services. It is calculated using entry and exit dates or shelter stay dates, depending on the project's method of tracking bed nights.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

Longitudinal Systems Analysis	LSA	The LSA is a report submitted by each CoC on an annual basis, and includes demographic, performance, and household composition information, as well as patterns of system use. The LSA from each CoC is consolidated to create the AHAR that is submitted to Congress.
Other (project type)		A project that offers services, but does not provide lodging, and cannot otherwise be categorized as another project type, per above. Any project that provides only stand-alone supportive services (other than outreach) and has no associated housing outcomes should be categorized as 'Other.' For example, a project funded to provide child care for persons in permanent housing or a dental care project funded to serve homeless clients should be typed 'Other.' A project funded to provide ongoing case management with associated housing outcomes should be typed 'Services Only.'
Participating Agencies		Agencies, organizations or local government departments that actively participate in HMIS through input of client-level data and project information.
PH - Housing Only	OPH	A project that offers permanent housing for persons who are experiencing homelessness, but does not make supportive services available as part of the project.
PH – Housing with Services (no disability required for entry)	OPH	A project that offers permanent housing and supportive services to assist homeless persons to live independently, but does not limit eligibility to individuals with disabilities or families in which one adult or child has a disability.
PH - Permanent Supportive Housing (disability required for entry)	PSH	A project that offers permanent housing and supportive services to assist chronic homeless persons with a disability (individuals with disabilities or families in which one adult or child has a disability) to live independently.
PH - Rapid Re-Housing	RRH	A permanent housing project that provides housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.
PH - Rapid Re-Housing Subtypes		RRH: Services Only - A RRH project that provides services only and does not provide ongoing rental assistance or support any inventory for participants. RRH: Housing with or without services - A RRH project that offers ongoing rental assistance that may or may not be accompanied by financial or other supportive services to participants.
Point in Time Count	PIT	A point-in-time count is an unduplicated count on a single night during the last ten days of January of the people in a community who are experiencing homelessness that includes both sheltered and unsheltered populations. An annual sheltered PIT count is conducted using HMIS data and other sources. A biannual unsheltered PIT is conducted on odd years.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

Policies, Procedures, and Standards Committee	PPS Committee	The PPS Committee will function as an advisory group to the CoC Board. This committee aligns with the intent of ensuring that the CoC has clearly documented policies and standards for process review, policy formation, assessment of current policies and procedures and formation and conduct of committees in the service of the CoC, Coordinated Entry System (CES) and Homeless Management Information System (HMIS). The PPS Committee will support with creating a clear structure for policy development and subsequent revisions, monitoring and vetting work done through committees, work groups and ad hoc groups will create efficiencies and improve the amount of work that the CoC Board can accomplish.
Project Types		<p>A project is to be assigned a 'Project Type' based on the lodging or service it is providing. The project type selected directly impacts data collection and reporting requirements. The U.S. Department of Housing and Urban Development defines these Project Types in HMIS:</p> <ul style="list-style-type: none"> • Homelessness Prevention • Street Outreach • Emergency Shelter - Entry Exit • Emergency Shelter - Night-by-Night • Day Shelter • Transitional Housing • Safe Haven • PH - Rapid Re-Housing • PH - Permanent Supportive Housing (disability required for entry) • PH – Housing with Services (no disability required for entry) • PH - Housing Only • Coordinated Entry • Services Only • Other
Projects for Assistance in Transition from Homelessness	PATH	PATH is funded by the Substance Abuse and Mental Health Services Administration (SAMHSA). It provides services to mentally ill homeless people, primarily through street outreach, to link them to permanent community housing. This project has different reporting requirements than HUD funded projects and uses HMIS to collect this information.
Runaway Homeless Youth program	RHY	The Runaway and Homeless Youth Program (RHY) supports street outreach, emergency shelters and longer-term transitional living and maternity group home programs to serve homeless youth (up to age 25). The program is managed by the Family and Youth Services Bureau (FYSB).
Safe Haven	SH	A project that offers supportive housing that (1) serves hard to reach homeless persons with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services; (2) provides 24-hour residence for eligible persons for an unspecified period; (3) has an overnight capacity limited to 25 or fewer persons; and (4) provides low demand services and referrals for the residents.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

Services Only	SSO	A project that offers only stand-alone supportive services (other than outreach) to address the special needs of participants (such as child care, employment assistance, and transportation services) and has associated housing outcomes.
Street Outreach	SO	A project that offers services necessary to reach out to unsheltered homeless people, connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Only persons who are “street homeless” should be entered into a street outreach project. Projects that also serve persons other than “street homeless” must have two separate projects to be set up in an HMIS – one ‘Street Outreach’ and the other ‘Services Only.’
Supportive Services for Veteran Families Program	SSVF	This program is overseen by the VA, and the purpose is to provide supportive services grants to private non-profit organizations and consumer cooperatives who will coordinate or provide supportive services to very low-income veteran families who are residing in permanent housing, are homeless and scheduled to become residents of permanent housing within a specified time period, or after exiting permanent housing, are seeking other housing that is responsive to such very low-income veteran family’s needs and preferences.
System Performance Measures	SPM	The HUD System Performance Report measures the performance of a CoC as a whole as mandated by the 2009 HEARTH Act. The System Performance 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.
Transitional Housing	TH	A project that provides temporary lodging and is designed to facilitate the movement of homeless individuals and families into permanent housing within a specified period of time, but no longer than 24 months. Requirements and limitations may vary by program and may be specified by the funder.
U.S. Department of Veterans Affairs	VA	The U.S. Department of Veterans Affairs provides patient care and federal benefits to veterans and their dependents.
User Agreement		The agreement form between individual users and the HMIS Lead Agency that outlines a user’s responsibilities when using HMIS. This form is signed on the user’s first log-in to HMIS, and again every year the user’s account is active.
Veteran Affairs Supportive Housing	VASH	The HUD-Veterans Affairs Supportive Housing (HUD-VASH) program combines Housing Choice Voucher (HCV) rental assistance for homeless Veterans with case management and clinical services provided by the U.S. Department of Veterans Affairs (VA). VA provides these services for participating Veterans at VA medical centers (VAMCs) and community-based outreach clinics.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

Orange County United Way: HMIS Lead Agency

The Orange County CoC has designated Orange County United Way as the Homeless Management Information System (HMIS) Lead Agency. Orange County United Way's key service, 2-1-1 Orange County (211OC), connects thousands of OC residents with health and human service resources, and administers the Homeless Management Information System (HMIS) for the Orange County CoC. As such, 211OC is tasked with assisting the Orange County CoC with:

- Developing and implementing a privacy plan, security plan and data quality plan for the CoC HMIS
- Ensuring consistent participation of State, Federal and local government funded recipients and sub recipients in HMIS
- Ensuring HMIS is administered in compliance with requirements prescribed by the U.S. Department of Housing and Urban Development (HUD)
- Ensuring the HMIS operates efficiently and effectively to promote agency participation and system coordination
- Providing system, agency, and project-level analysis of utilization and performance across the CoC

HMIS Lead Agency Contact Information:

OC HMIS Information Website	http://ochmis.org/
OC HMIS Training Website	http://training.ochmis.org/
OC HMIS Login	https://oc.clarityhs.com/login
HMIS Helpdesk	http://ochmis.211oc.happyfox.com/home

I. Background & Purpose

The Homeless Management Information System (HMIS) is the electronic data collection system utilized by the Orange County CoC to comply with the responsibilities outlined in 24 CFR 578.7(b) for designating and operating an HMIS. HMIS is the local information technology system requirements that U.S. Department of Housing and Urban Development (HUD) funding recipients and subrecipients use for homeless assistance programs as authorized by the McKinney-Vento Homeless Assistance Act. The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act codifies in law certain data collection requirements integral to HMIS. The HEARTH Act requires that HUD ensure operation of and consistent participation by recipients and sub-recipients in an HMIS compliant software. Current HMIS standards are included in the 2004 Technical Standards and the 2010 Data Standards.

HUD and other planners and policymakers use aggregate HMIS data to better inform homeless policy and decision making at the federal, state and local government levels. HMIS enables HUD to collect aggregate data at the national-level on the extent and nature of homelessness over time. Specifically, an HMIS can be used to produce an unduplicated count of homeless persons, understand patterns of service use, and measure the effectiveness of homeless programs. Data on homeless persons is collected and

Item 3. Attachment B

Orange County HMIS Policies and Procedures

maintained at the local level. HMIS implementations can encompass geographic areas ranging from a single city to an entire state.

The HEARTH Act also requires that all communities have an HMIS with the capacity to collect unduplicated counts of individuals and families experiencing homelessness. Through HMIS, a community should be able to collect information from projects serving homeless families and individuals to use as part of their needs analyses and to establish funding priorities. The HEARTH Act also codified into law certain data collection requirements integral to HMIS. With enactment of the HEARTH Act, HMIS participation became a statutory requirement for recipients and subrecipients of CoC Program and Emergency Solutions Grants (ESG) funds.

An HMIS can be used to:

- Produce an unduplicated count of persons experiencing homelessness for each CoC
- Describe the extent and nature of homelessness locally, regionally, and nationally
- Identify patterns of service use
- Measure program effectiveness

The ensuing set of HMIS Policies and Procedures documents the Orange County CoC's operation of its HMIS and acts as a guide to its continuing operation in compliance with the CoC and ESG Regulations and Interim Rules. The HMIS Policies and Procedures have been developed in mind to further the following HMIS Goals:

- Assist in facilitating the coordination of care for homeless and at risk of homelessness populations.
- Ensure accurate data about the nature of homeless services and clients in the Orange County CoC.
- Ensure accurate data about the nature and extent of prevention and diversion services provided to households at risk of homelessness in the Orange County CoC.
- Collect data that fulfills federal, state and local requirements for homeless reporting and inform system gaps and resource development

II. Policies and Procedures Summary

This document serves as the minimum standards of participation in the Orange County HMIS and represents general best practices. Operational standards in this document are not intended to supersede grant specific requirements and operating procedures as required by funding entities. PATH, HOPWA, and VA providers have operating rules specific to the U.S. Departments of Health and Human Services (HHS) and Veterans Affairs (VA).

The HMIS Lead Agency will update this document at any time when necessary due to HUD or local CoC changes. [The latest versions of the HUD HMIS Data Standards Manual and Data Dictionary](#) are the basis for all programming specifications and requirements of HMIS. Updates will be brought to the Policies, Procedures and Standards Committee and the CoC Board for approval. Upon approval, updates to this

Item 3. Attachment B

Orange County HMIS Policies and Procedures

document will be announced to all Agency Administrators via email and posted on the OCHMIS website. The most recently updated version of this document is the only version that is considered valid and supersedes all previous versions.

III. HMIS Lead Agency Responsibilities

- a. Provide HMIS User training as needed.
- b. Develop and maintain training materials for all HMIS training.
- c. Develop and maintain client forms, including client and privacy forms.
- d. Create HMIS User accounts and control access to HMIS.
- e. Communicate all system-wide changes to Agency Administrators via direct emails, announcements on ochmis.org and/or User Meetings.
- f. Resolve HMIS-related grievances that cannot be resolved by the agency working with the client. Clients can submit a grievance by completing the [Grievance Form](#) or calling 714-589-2360.
- g. Host HMIS User Meetings open to all HMIS Users to discuss the use and implementation of HMIS. Please refer to the [OC HMIS calendar](#) for additional meeting details.
- h. Host the Data and Performance Management meetings, which are open to all HMIS Agency Administrators, and focus on performance and policies related to HMIS. Please refer to the [OC HMIS calendar](#) for additional meeting details.
- i. Provide technical support to Agency Administrators via the HMIS Help Desk.
- j. Serve as intermediary between Participating Agencies and the HMIS vendor.
- k. Alert the HMIS vendor to all HUD deadlines for data standards changes, required reporting specifications, etc.
- l. Complete HMIS software testing, as needed.
- m. Submit tickets on behalf of Participating Agencies when HMIS Lead Agency is not able to resolve a technical issue.
- n. Ensure OC HMIS will be available to HMIS Users at a minimum of 99.95 percent of the monthly billing cycle. The HMIS Lead Agency will inform all HMIS Users of any planned or unplanned service outages via direct email or announcement on ochmis.org.
- o. Facilitate access to system level data.
- p. Establish HMIS participation fees based on appropriate criteria in collaboration with the CoC Collaborative Applicant and as approved by the CoC Board.
- q. Serve as Lead for all HUD-required reporting involving HMIS data (HIC and Sheltered PIT, System Performance Measures, Longitudinal Systems Analysis, etc.).
- r. Publish system, agency, and project level reports from HMIS as needed.

IV. Help Desk Policies

- a. HMIS Help Desk hours are Monday through Friday from 9AM to 5PM, excluding holidays.
- b. Only designated Agency Administrators may submit requests for technical support to the HMIS Help Desk. The methods of contacting the HMIS Help Desk are below. Agency Administrators should not directly contact individual members of the HMIS team.
 - a. HMIS Help Desk phone number 714-589-2360
 - b. HMIS Help Desk website <http://ochmis.211oc.happyfox.com/home>

Item 3. Attachment B

Orange County HMIS Policies and Procedures

- c. HMIS Staff strives to answer all technical support tickets within three (3) business days, but workload, holidays and number of available staff may delay response. Agency Administrators are responsible for raising technical issues in a timely manner, keeping in mind that their request may not be solved same day.
- d. Client identifying information should never be sent to the [HMIS Help Desk](#). This includes but is not limited to: First Names, Last Names, Dates of Birth, or Social Security Numbers. If you need to discuss a specific client only the client's HMIS unique ID should be sent. Agency Administrators who repeatedly submit client identifying information to the [HMIS Help Desk](#) may be subject to corrective action.

V. Agency Access

- a. In order to be granted HMIS Access, an organization must be able to meaningfully contribute information related to homeless assistance projects and/or homelessness prevention projects to the Orange County CoC. Homeless assistance projects include Emergency Shelter, Transitional Housing, Permanent Housing, and Street Outreach projects. These projects offer assistance to clients who are entering from a literal homeless situation. Homelessness prevention projects provide assistance to clients who are at risk of homelessness.
- b. An organization that at minimum meets one of the following criteria will be granted access to HMIS:
 - a. Manage at least one homeless assistance housing project, including Emergency Shelter, Transitional Housing, and Permanent Housing projects, that will be contributing data to HMIS. Adding these project types to HMIS will increase the CoC's bed coverage which is a priority for the CoC.
 - b. Receive federal and/or state funding for the implementation and operations of a homeless assistance project and/or homelessness prevention project that requires HMIS participation.
 - i. Organizations receiving funding that requires HMIS participation will be given data entry access, but this does not necessarily include data sharing with other agencies. Law enforcement agencies and legal service providers receiving funding that requires HMIS participation will be given data entry access only.
 - ii. Victim Service Providers and legal service providers that are recipients of funds requiring participation in HMIS, but do not directly enter data into an HMIS, must use a comparable database. A comparable database allows the collection of the aggregate data needed for reporting while respecting the sensitive nature of the client-level information if it complies with all HMIS data, technical and security standards.
 - iii. Victim Service Providers receiving CoC Program funds or ESG Program funds may request up to five licenses for read-only access in HMIS for the purpose of care coordination. The provider will be required to pay the User Fee for 1 – 5 users as outlined in the Participating Agency Requirements section.
- c. Organizations that do not meet the above listed criteria will be required to complete the HMIS 101 online course and submit an [HMIS Access Application](#) for review and consideration by the HMIS Access Working Group to further evaluate the request.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

- a. The HMIS Access Working Group will be comprised of three to four CoC General members recommended by the current HMIS Access Working Group members, the CoC Collaborative Applicant and the HMIS Lead Agency, and appointed by the CoC Board.. The HMIS Access Working Group will meet monthly or on an as-needed basis for the purposes of evaluating HMIS Access Applications.
- b. When vacancies occur, the Office of Care Coordination as the CoC Collaborative Applicant will send an email via the CoC distribution list notifying CoC General Membership of vacancies in the HMIS Access Working Group and soliciting interested participants. Additionally, as needed, the HMIS Access Working Group, CoC Collaborative Applicant and the HMIS Lead Agency will outreach to qualified CoC General Members individually to solicit interested participants. The CoC will confirm interest from CoC General Members to be considered for the HMIS Access Working Group. The HMIS Access Working Group, the CoC Collaborative Applicant and the HMIS Lead Agency will then review all interested candidates to select the most qualified member(s) for the working group to be recommended to the CoC Board for appointment.
 - i. Qualifications:
 1. Individual must belong to an agency that is an Orange County CoC General Member or be an Individual General Member
 2. At least two (2) years of experience with the Homeless Management Information System (HMIS) preferred
 3. At least two (2) years of experience with the Orange County homeless service system preferred
 4. Works collaboratively with team members and can provide constructive feedback
 5. Ability to make informed decisions based on objective analysis of available information
 6. Desire to positively impact the Orange County homeless system
 7. Understanding of the Orange County CoC's responsibility of promoting access and effective utilization of mainstream programs
 8. Have the availability to commit to serve a minimum term of one year
- d. The HMIS Access Application requires organizations to detail how their organization's participation in HMIS will be able to meaningfully contribute information related to homeless assistance projects or homelessness prevention projects to the Orange County CoC and how the HMIS access will improve the provision of homeless services in the Orange County CoC. The HMIS Access Application will also assist the HMIS Access Working Group to evaluate the organization's HMIS Data Sharing capabilities.
- e. Organizations that meet the requirements for HMIS Access must be in compliance with all other aspects of the HMIS Policies and Procedures, including the HMIS Participating Agency Agreement and the Data Sharing Agreement.
- f. Agencies approved for HMIS access must begin entering data into HMIS within 90 days of approval. After this time the agency's approval will expire and the agency will need to resubmit their application to gain HMIS access.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

- g. Agencies that are denied access to HMIS by the HMIS Access Working Group may request an appeal. The purpose of the appeal is to ensure the integrity of the review process for the agency's application. Appeals must be submitted to the HMIS Help Desk.
 - a. Upon receipt of the request, the HMIS Lead Agency will complete the Agency Access Process Review, and determine whether the review process was followed appropriately. If all steps of the review process were followed, the decision by the Agency Access Working Group stands. If all steps in the review process were not followed, a sub-set of the Policies, Procedures, and Standards Committee will provide a secondary review and make a final determination regarding the agency's application. This decision cannot be appealed, but agencies denied access to HMIS may re-apply in the future if they can effectively address the reasons their initial application was denied.
- h. The HMIS Access Working Group and the HMIS Lead Agency reserve the right to remove HMIS Access if the access is not being used to improve service provision for clients or contributing meaningful data to the Orange County CoC. Examples of unacceptable uses of HMIS include but are not limited to:
 - a. Using HMIS data to monitor the whereabouts or service utilization of participants for purposes outside of housing-focused case management
 - b. Using HMIS data outside of a business need
 - c. Using data in HMIS as a reason to not serve a client that is not related to eligibility criteria (ie. substance use history, mental health issues, etc.)
 - d. Sharing client identifying data with persons or groups that don't have access HMIS

VI. Participating Agency Requirements

- a. Submit an HMIS Participating Agency Agreement
 - a. Participating agencies must submit an HMIS Participating Agency Agreement, signed by the agency's Executive Director or equivalent leadership before the agency and/or projects can be set up in HMIS.
 - b. This document must be renewed annually with new agreements being signed during the annual HMIS Agency Audit.
- b. Executive leadership must confirm the designation of two staff to be assigned the Agency Administrator role at the time of agency setup.
 - a. If Agency Administrators must be designated after initial agency setup, executive leadership must contact the HMIS Lead Agency (via the online HMIS Help Desk) to notify the HMIS Lead Agency of the new Agency Administrators.
 - b. The following information is required of all Agency Administrators:
 - i. Full name.
 - ii. Work email address that includes the staff name. Personal emails will not be allowed. Shared email accounts or general agency email are also not allowed.
 - iii. Work phone number.
- c. Comply with all federal, state and local government laws and regulations regarding non-profit data collection, and with all HMIS policies and procedures including the latest versions of the

Item 3. Attachment B

Orange County HMIS Policies and Procedures

HMIS Data and Technical Standards Final Notice and the HMIS Data Standards Manual relating to the collection, storage, retrieval, and dissemination of client information.

- d. When applicable, participating agencies may be obligated to comply with the Health Insurance Portability and Accountability Act (“HIPAA”), and/or with 42 CFR Part 2, regarding the confidentiality of substance use disorder patient records. Where possible, these agencies should comply with HIPAA, with 42 CFR Part 2, and with the HMIS Privacy Plan. If it is not possible to reconcile all of the applicable rules, then agencies should comply with the more stringent regulations. Agencies and programs are responsible for ensuring HIPAA and 42 CFR Part 2 compliance.
- e. Abide by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA).
- f. Participate in an annual HMIS Agency Audit to ensure compliance with the HMIS Policies and Procedures. Review the [Agency Audit Form](#) for an overview of the items included in the audit. Please note that the audit form may change to accommodate changes in requirements.
 - a. The HMIS Lead Agency will audit all HMIS Participating Agencies on a yearly basis, regardless of funding source. The CoC Collaborative Applicant may also attend audits.
 - b. The HMIS Lead Agency will include the audit checklist in the scheduling email sent to the Agency Administrator two (2) weeks prior to the audit.
 - c. Agencies are expected to be prepared for the audit by completing all items included in the scheduling email.
 - d. An Agency Administrator must be present during the audit.
 - e. Agencies and the HMIS Lead Agency can request to reschedule the Agency Audit up to one (1) business day before the audit is scheduled. For example, the agency will notify the HMIS Lead Agency by end of day Monday that the agency will need to reschedule an audit for Tuesday. Requests to reschedule or cancellations that occur after that window has passed are considered unsuccessful attempts to contact the agency. Failing to attend the scheduled audit is also considered an unsuccessful attempt to contact the agency.
 - i. After 2 unsuccessful attempts to contact the agency the HMIS Lead Agency will reach out to the agency’s Executive Director or other leadership.
 - f. If the agency remains unresponsive after attempting to contact the agency’s leadership twice the agency will fail the audit for that year. If any deficiencies are found in the audit, the Agency Administrator and the HMIS Lead Agency staff person will agree upon a date that the issue should be resolved by. If the corrections are not made by the agreed upon date, the agency will fail the audit for that year.
 - i.
 - g. Agencies that fail their audit will be reviewed by the HMIS Access Ad Hoc to determine the appropriateness of the agency’s continued participation in the OC HMIS, and the agency may have HMIS Access revoked.
 - h. Agencies that pass their HMIS Annual Audit will be recognized on the OC HMIS Website.
- g. Pay HMIS participation fees based upon CoC board approved fee structure.
 - a. The HMIS User License Fee Policy is applicable to all agencies participating in the Orange County HMIS.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

- b. Agencies that receive state and/or federal funding that require HMIS participation will be charged for the number of licenses the agency has active at the end of the calendar year, based on the fee structure detailed below:
 - i. 1 – 5 users: \$750 annually
 - ii. 6 – 24 users: \$2,750 annually
 - iii. 25 or more users: \$3,500 annually
- c. Agencies that are Coordinated Entry Access Points will be charged an annual fee of \$200 in addition to any user fees they may incur. This applies to all Access Points, whether or not they are required to participate in HMIS. The \$200 fee will apply to agencies regardless of the number of Coordinated Entry Systems they are participants in.
- d. Agencies are allowed up to two active Agency Administrators at a time. Agencies will be allowed an additional Agency Administrator for every 700 active enrollments at the end of the calendar year. Agencies that require additional Agency Administrators in addition to those outlined in this policy must pay the set-up and ongoing user fees for those accounts, and can contact the HMIS Lead Agency for an invoice. The additional Agency Administrators license fee is \$759.28 per license annually. This fee is subject to change per vendor licensing fee.
- e. Agencies may request standalone Looker licenses for the purposes of scheduling ad hoc reports to be sent to a secure location outside of HMIS. The fee for these licenses is \$1,236 per license annually, and is subject to change per vendor licensing fee. This functionality is optional, and not necessary to access the agency's data in HMIS.
- f. If a user has access to multiple agencies in HMIS, only the user's primary agency in HMIS will be charged.
- g. Agencies that are newly awarded funding that requires HMIS participation during the calendar year will be required to pay \$500 prior to the awarded funding being implemented in HMIS.
- h. Complete any reporting, data quality, data entry, or other requirements outlined by the U.S. Department of Housing and Urban Development (HUD), the Coordinated Entry System (CES) Lead, or the HMIS Lead. Agencies can work collaboratively with other HMIS participating agencies to complete reporting, data quality, data entry, other requirements. The CES Lead and HMIS Lead Agency will only request the minimum necessary data and reports.
 - a. All agencies participating in HMIS are included in the HMIS Data Quality Report Cards published on a quarterly basis. The HMIS Data Quality Report Cards are created and posted by the HMIS Lead. Review the Data Quality Monitoring and Reporting Process section of the Data Quality Plan for details regarding this process.
 - b. Agencies with Street Outreach, Emergency Shelter, Transitional Housing, Rapid Re-Housing, Homelessness Prevention, or Permanent Supportive Housing/Other Permanent Housing projects are included in the Project Performance reports published on a monthly basis. Review the Orange County CoC Project Performance Overview document for more details on this process.
 - c. Emergency Shelter, Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, and Other Permanent Housing projects are required to participate in the Housing Inventory Count (HIC) that occurs annually on one day during the last 10 days of January.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

- d. Emergency Shelter and Transitional Housing projects are required to participate in the Sheltered Point in Time Count (PIT) that occurs annually on one day during the last 10 days of January.
- e. The System Performance Measures report (SPM) is submitted to HUD on an annual basis, and includes Street Outreach, Emergency Shelter, Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, and Other Permanent Housing projects. The reporting period for this report is October 1st through September 30th.
- f. The Longitudinal Systems Analysis (LSA) is submitted to HUD on an annual basis, and includes Emergency Shelter, Transitional Housing, Rapid Re-Housing, and Permanent Supportive Housing projects. The reporting period for this report is October 1st through September 30th.
- g. Review the HMIS Participating Agencies Schedule for an estimated timeline of activities that HMIS participating agencies may be required to participate in during the course of the year. Exact dates will be shared by the HMIS Lead.
- i. Comply with Orange County's minimum participation requirements for HMIS usage. The HMIS Lead Agency will conduct a quarterly review to ensure all agencies are meeting the minimum participation requirements. If any of the following are true at the time of the review, the agency will have one month to rectify the issue. If the issue is not resolved after one month the HMIS Agency Access Working Group will be notified to determine whether or not the agency should continue to have access to HMIS. If the agency is found to not meet the minimum participation requirements during the quarterly review at least three times in a year the HMIS Agency Access Working Group will also be notified.
 - a. Agency does not have at least one active user.
 - b. Agency does not have at least one active enrollment.
 - c. Agency does not have activity in HMIS in the past 30 days. Activity includes enrollments, services, assessments, files, or exits. (This minimum participation is not applicable to Public Housing Authorities)
 - d. Agency did not submit the HIC and/or PIT for appropriate project types.
 - e. Agency does not have at least one Agency Administrator that is an active HMIS user.
 - f. Agency has not had staff representation for at least one User Meeting during the previous quarter.
- j. Organizations found to not meet one or more of the guidelines above may be contacted by the HMIS Lead Agency to discuss the appropriateness of the agency's continued participation in the OC HMIS, the HMIS Lead Agency may inform the HMIS Access Ad Hoc to determine the appropriateness of the agency's continued participation in the OC HMIS, and the organization may have HMIS Access revoked.

VII. Agreements and Certifications

- a. All OC HMIS Participating Agencies must have updated versions of the documents below on file with the HMIS Lead Agency in order to gain and retain access to the OC HMIS. The forms are available on the OC HMIS website: [HMIS Data & Set Up Forms](#)
 - a. **Interagency Data Sharing Consent Form** – Allows client-level data and enrollment data to be shared among OC HMIS Participating Agencies. HOPWA funded projects are exempt

Item 3. Attachment B

Orange County HMIS Policies and Procedures

from the data sharing mandate due to privacy laws protecting clients' HIV status. The Interagency Data Sharing Consent Form must be signed by the participating agency's Executive Director or equivalent.

- b. **HMIS Participating Agency Agreement** – Outlines the participating agency's responsibilities in protecting client privacy, properly obtaining client consent to share data, monitoring the use of HMIS and reporting any breaches of security by agency staff and improper system use of HMIS. Must be signed by Executive Director or equivalent.
- c. **User Agreement** – Outlines the HMIS User's responsibilities in protecting client privacy, proper system use and abiding of the HMIS Policies and Procedures. Must be signed during each user's first log-in to HMIS, and must be renewed annually.

VIII. HMIS User Access Roles

- b. Users with access to HMIS will be assigned one of the following access roles. Access roles control the level and type of access the user has to functionality within the OC HMIS.
 - a. **Agency Staff:** Users with this access have the ability to add and edit client profiles, enrollments, services, and exits, as well as the ability to run client-level, canned, and ad hoc reports. This level of access is the most common in OC HMIS.
 - b. **Agency Administrator:** Users with this access have the same abilities as Agency Staff users, as well as the ability to delete enrollments, services, files, and location data at the user's Primary Agency. The Agency Administrator is responsible to be the first tier of technical support to their agency HMIS Users. After all resources are exhausted, the Agency Administrator will submit an HMIS helpdesk support ticket. Only Agency Administrator are permitted to submit tickets to ensure the request has been reviewed by the responsible parties.
 - c. **Read Only:** Users with this access can view client profiles, enrollments, services, and exits, but cannot add or edit data, and they cannot run canned or ad hoc reports.
 - d. **CES Access:** Agency Staff or Agency Administrator users can also be given CES access. Users with CES access have access to the Referrals page, which includes adding clients to the Community Queue, adding and editing housing opportunities, and reviewing or denying matches to housing opportunities.

IX. HMIS User Requirements

- a. Agency Staff and Agency Administrator users must complete the following trainings:
 - a. **HMIS Part 1 Training** – Covers the history and purpose of HMIS and the contents of the OC HMIS Policies and Procedures handbook.
 - b. **HMIS Part 2 Training** – Covers HMIS functionality, HUD definitions, key terms, and data quality best practices.
 - c. **HMIS Task List** – A list of tasks to be completed by the user in the Clarity Training Site to assess what the user has learned.
 - d. **HMIS Recertification** – OC HMIS Users are required to complete an annual HMIS Recertification Training to reinforce HMIS data entry functionality.
- b. Read Only users must complete the following training:

Item 3. Attachment B

Orange County HMIS Policies and Procedures

- a. HMIS Part 1 Training – Covers the history and purpose of HMIS and the contents of the OC HMIS Policies and Procedures handbook.
- c. Users requesting CES access must complete the following training in addition to the trainings mentioned in part A of this section.
 - a. HMIS Coordinated Entry Training – Includes an overview of the different roles involved in the Coordinated Entry process, and a review of the HMIS functionality needed for each role.
- d. All HMIS Users must provide the following information in order to receive an HMIS account:
 - a. The HMIS User’s first and last name.
 - b. The HMIS User’s *work* email. Personal emails will not be allowed. Shared email accounts are also not allowed.
- e. All HMIS Users must be able to clearly explain the purpose and benefit of HMIS and the related HMIS Consent Form to the homeless and at-risk of homelessness populations as detailed in the Client Privacy section. This includes providing an overview of:
 - a. What is HMIS?
 - b. What personal identifying data will be collected and how it will be used
 - c. Privacy and confidentiality standards
 - d. Revocation of consent and how to do it

X. Agency Administrator Requirements

- a. Agency Administrators are the designated point of contact for the agency regarding HMIS related requests and updates. Agency Administrators must complete the Agency Administrator training before they can be certified as Agency Administrators. This training covers the responsibilities of the Agency Administrator, as well as training on HMIS functionality specific to Agency Administrators.
- b. Agency Administrators are responsible for training all staff at their agency as needed.
 - a. Identify staff members who need access to HMIS and ensure they complete any required HMIS User trainings in a timely fashion.
 - b. Inform the HMIS Help Desk of HMIS Trainings completed by any users at the agency by submitting the [HMIS Account Update and Testing Form](#).
- c. Agency Administrators are the primary technical support for their HMIS Users.
 - a. All HMIS User technical questions should be directed first to the Agency Administrator. If the Agency Administrator cannot solve the problem, they can then contact the [HMIS Help Desk](#). HMIS Users who are not certified Agency Administrators are not allowed to contact the HMIS Help Desk. See the Help Desk Policies section for more details.
- d. Agency Administrators are responsible for sharing system-wide changes and other relevant information with all users at their agency.
 - a. Agency Administrators periodically receive emails from the HMIS Lead Agency regarding HMIS. Agency Administrators are responsible for reading these emails and communicating the relevant information in them to their staff who are HMIS Users.
 - b. Agency Administrators should attend the monthly User Meetings. These webinars are announced via direct email to all Agency Administrators.
- e. Agency Administrators must notify the HMIS Lead Agency of all personnel changes.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

- a. When an HMIS User no longer needs access to HMIS, whether due to changing job responsibilities or departure from the agency, Agency Administrators must complete the [HMIS Account Update & Testing Form](#).
- b. When an Agency Administrator no longer needs access to HMIS, whether due to changing job responsibilities or departure from the agency, another Agency Administrator at the agency or executive leadership is required to submit the contact information of the replacement Agency Administrator via the [HMIS Help Desk](#).
- f. Agency Administrators must monitor compliance with standards of confidentiality and data collection, entry, and retrieval outlined in the OC HMIS Policies and Procedures.
 - a. Inform your users that they are obligated to report suspected instances of noncompliance and/or security violations to the Agency Administrator as soon as possible.
 - b. Escalate any security violations that your agency's HMIS Users report to you to the HMIS Agency Administrator via the [HMIS Help Desk](#).
 - c. Ensure that all staff at your agency are aware that HMIS usernames and passwords are NOT to be shared with anyone under any circumstances. HMIS Users should not share their HMIS login information with other staff at their agency, their Agency Administrator, their executive leadership, their IT Staff, etc.
 - d. Ensure all HMIS users at the agency are able to clearly explain the purpose and benefit of HMIS and the related HMIS Consent Form to clients as included in the HMIS User Requirements section.
- g. Agency Administrators are responsible for ensuring that agency equipment meets the specifications outlined in the Technical Standards section of this document.
- h. Agency Administrators must ensure that agency data quality either meets data quality thresholds for each relevant project type, or is on track to meet said thresholds.
 - a. Agency Administrators should be able to describe their agency's regular data quality monitoring procedure. For example, "We run x, y, and z reports each month. I identify data quality errors and fix them myself or delegate them to Users x, y, and z." Please review the OC HMIS Data Quality Plan for guidance. The HMIS Lead Agency is available to help develop an agency's data quality monitoring procedure as needed.
 - b. Agency Administrators must work with the HMIS Lead Agency to ensure the agency is collecting all relevant Universal and Program Specific Data Elements dependent on project type and funding source.
 - c. All data entered into the OC HMIS must meet applicable Data Quality and Data Timeliness standards based on project type as agreed by the CoC in partnership with the CoC Board and the CoC Collaborative Applicant.
 - d. Agency Administrators are responsible for ensuring the agency is in compliance with the Orange County HMIS Data Quality Plan.
- i. Agency Administrators must ensure all projects in the HMIS database are set-up correctly, and notify the HMIS Lead Agency when a project is no longer serving clients.
 - a. Agencies should notify the HMIS Helpdesk when they would like any of their projects to start participation in the OC HMIS. The HMIS Lead Agency and/or the CoC Collaborative Applicant reserves the right to deny access to agencies and/or projects that do not serve the homeless population.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

- b. Agency Administrators are required to notify the HMIS Lead Agency when project changes have occurred, including changes in funding sources and bed inventory.
- c. The HMIS Lead Agency and/or the CoC Collaborative Applicant will provide technical assistance and recommendations to the agency on how to best set up the project in HMIS to ensure adequate reporting and benefit to the Orange County CoC and its System Performance Report. Projects whose performance or data quality negatively affects the CoC as a whole may be subject to corrective action. Corrective action discussed in the [Data Quality Plan](#) around performance will be done in conjunction with the CoC Collaborative applicant.
- d. Agency Administrators are required to submit a [Project Close Out Form](#) when projects are no longer active. The HMIS Lead Agency will deactivate the project in HMIS so no new enrollments can be added to the project. Data from deactivated projects will remain available in HMIS for 7 years per HUD requirements.

XI. Technical Standards

- a. HMIS Participating Agencies must adhere to the following technical standards with regards to all technical equipment used to access HMIS. HMIS Participating Agencies must also adhere to the [HUD HMIS Technical Standards](#). The HMIS Lead Agency is not responsible for providing proper technical equipment or for providing IT services unrelated to HMIS.
- b. The most recent version of the following web browsers are supported for accessing HMIS:
 - a. Google Chrome
 - b. Microsoft Edge
 - c. Mozilla Firefox
 - d. Apple Safari
- c. An internet connection is required to access HMIS, and is the sole responsibility of the participating agency.
- d. All screens must lock within 5 minutes of inactivity and point to the computer terminal or mobile device login page upon subsequent activity. Users should manually lock their screen when they leave their device unattended.
 - a. Windows: Press the Windows + L keys on the keyboard
 - b. Mobile device: Briefly press the Power button
 - c. Mac: Press Control + Command + Q keys on the keyboard
- e. Computers, Tablets, or Other Mobile Devices that Access HMIS OR share a network with computers or mobile devices that access HMIS (iPads and other devices that run on iOS are exempt from these requirements)
 - a. Must have virus protection software that has been updated in the past week and performs scans daily and automatically updates to the most current version.
 - b. Must have a firewall in place between any computer and internet connection for the entire network, be protected with at minimum Wired Equivalent Privacy (WEP), use Network Address Translation (NAT), and maintain the most recent virus security updates.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

- f. All computer terminals and mobile devices used to access HMIS (including organization network equipment) must be stored in a secure location (ie. a locked office area that is not accessible to the public).
 - a. Agency must adhere and be consistent with the agency's expectations of information security for staff working at the office full-time. Staff who work remotely will be expected to ensure the protection of proprietary agency and client information accessible from their remote office. Steps include, but are not limited to, the use of locked file cabinets, computers and desks; the regular maintenance of passwords; and any other steps appropriate for the job and the environment. Agency should be at a minimum in compliance with OC HMIS Technical Standards policies and the policies outlined in this document.
- g. The executive leadership or other empowered officer within the HMIS participating agency will be responsible for the maintenance and disposal of onsite computer and mobile device equipment. This includes:
 - a. Purchase of and upgrades to all existing and new computer and mobile device equipment for utilization in the system.
 - b. Provision of computer terminals or mobile device to all HMIS Users for accessing HMIS that have a unique username/password to log onto the operating system.

XII. Privacy

- a. HMIS Account Passwords
 - a. The HMIS vendor will enforce a password change for all HMIS accounts every 180 days.
 - b. HMIS Users will never share passwords or HMIS accounts for any reason. The sharing of HMIS accounts and/or passwords directly endangers the privacy of clients who entrust their personal identifying information to the OC HMIS. HMIS users found to be sharing HMIS accounts and/or passwords will be subject to corrective action.
 - c. After 30 minutes of inactivity in the OC HMIS, the system will automatically lock the user out and the user will need to enter their password again to gain access to HMIS.
 - d. If an HMIS User attempts to log in four (4) times with an incorrect password, the HMIS will automatically lock their account. The HMIS user will be unable to access HMIS for two hours unless their Agency Administrator contacts the HMIS Helpdesk to unlock the account.
- b. Access to HMIS
 - a. As discussed in the Agency Administrator Responsibilities section, agency staff who no longer need access to HMIS will have their HMIS account access revoked. In the event that HMIS account access is not revoked for any reason, the former HMIS User is required to act with integrity and not attempt to access HMIS if their job duties no longer include HMIS or if they leave their HMIS participating agency.
 - b. The HMIS Lead Agency reserves the right to lock the account of an HMIS User who has not completed required trainings. The HMIS Lead Agency will unlock the account once the required trainings have been completed.
 - c. If an HMIS User does not log into HMIS for 60 days, the HMIS account will be locked automatically. The user will receive a notification two (2) calendar days prior to the

Item 3. Attachment B

Orange County HMIS Policies and Procedures

account being locked. If an account is locked due to inactivity, the user will be required to complete the trainings outlined in the HMIS User Requirements section as well as any other trainings required by the HMIS Lead Agency to regain access to HMIS.

c. HMIS Data

a. Participating Agencies

- i. All HMIS Users are required to ensure that client identifying information is never sent across an unencrypted network, saved in an unprotected folder on a computer, or, in the case of hard copies of client identifying information, stored anywhere other than a locked file cabinet or office.
- ii. Client Identifying Information CANNOT be sent over unencrypted email either between a participating agency and the HMIS Lead Agency or between staff at a participating agency. The only permissible way to discuss an individual client over unencrypted email is using the client's ID number.
- iii. Agencies must have a formal policy for intra-agency communication regarding clients that protects client privacy.

b. HMIS Vendor

- i. The vendor will perform daily and weekly backups to prevent loss of data.
- ii. Backups will be stored both onsite and offsite. All standard security and privacy precautions apply to offsite storage. The offsite storage facility is equipped with surge protectors and natural disaster protective measures.

d. Client Privacy

a. In order for client records to be shared in HMIS, clients must consent to share their data with other agencies participating in HMIS.

- i. If the agency's first interaction with the client is over the phone, or otherwise not in person, clients can verbally consent to share their data. However, during the first in person meeting with the client the agency must ask the client to sign the **Client Consent to Share Protected Personal Information form** to continue sharing their data in HMIS.
- ii. Agency staff must explain the form to clients and how their information is used and viewed.
- iii. The form can be digitally signed in HMIS, or the agency can print a physical copy of the form for the client to sign. If the client signs a physical copy, the agency is required to upload the signed consent form to HMIS. If the agency chooses to keep physical files, they must be stored in a secure location.

b. Protected Personal Information (PPI) is defined in this manual and the Consent to Share Personal Protected Information form as:

- i. [Clients'] name and [Clients'] contact information
- ii. [Clients'] social security number and date of birth
- iii. [Clients'] basic demographic information such as gender and race/ethnicity
- iv. [Clients'] history of homelessness and housing (including [Clients'] current housing status, and where and when [Clients] have accessed services)
- v. [Clients'] self-reported medical history and disability status, including mental and physical health concerns, substance abuse history, and HIV/AIDS status
- vi. [Clients'] case notes and services

Item 3. Attachment B

Orange County HMIS Policies and Procedures

- vii. [Clients'] income sources and amounts; and non-cash benefits
 - viii. [Clients'] veteran status
 - ix. Information about other members of [Clients'] household
 - x. [Clients'] self-reported history of domestic violence
 - xi. [Clients'] photo (optional)
- c. If clients refuse to sign the **Client Consent to Share Protected Personal Information form** they cannot be pressured into signing the form or denied services on the basis of their refusal to sign. Participating agencies should follow the procedure outlined in [HMIS Part II Training](#) for entering client information into HMIS when clients refuse to sign the Client Consent to Share Protected Personal Information form. Refusal to sign the consent form means that all of that client's data is only visible by the agency serving the client, HMIS System Administrators, and the HMIS Vendor.
- d. Upon signing the **Client Consent to Share Protected Personal Information form** clients must be made aware of their right to revoke their consent to share protected information at any time.
- e. Participating agencies must have copies of the **Revocation of Consent form** available in areas accessible to clients at all times. Clients should NOT have to request this form from participating agency staff.
- i. If a client submits a **Revocation of Consent form**, participating agency staff must follow the most current procedure for removing sharing access to the client's protected personal information in HMIS. Review the [Refusing/Revoking Consent to Share Personal Information](#) knowledge base article for more information.
- f. Participating agencies must post the **Note Regarding Collection of Personal Information** in all areas where HMIS data entry occurs. Participating agencies should direct outreach teams to give a copy of the Note to each outreach worker.
- g. Participating agencies must post the **Privacy Notice** on their website.
- h. Participating agencies must have copies of the **HMIS Client Grievance form** available in areas accessible to clients at all times in the event of an HMIS related grievance. Clients should NOT have to request this form from participating agency staff.
- i. In the event that the participating agency's in house grievance policy was not able to resolve the grievance, clients will submit the grievance form directly to the HMIS Lead Agency.
- e. Client Record Requests
- a. Clients may inspect and obtain a copy of the following data entered in HMIS by requesting the Client Record Request Dashboard, which is inclusive of:
 - i. Data on the client's Profile screen
 - ii. The client's Release of Information
 - iii. The client's enrollment history in any projects that participate in HMIS
 - iv. All client documents uploaded into HMIS
 - b. Clients may submit the request to any agency participating in OC HMIS that they have been served by in the past.
 - i. An Agency Administrator at the agency is responsible for submitting a ticket to the HMIS Help Desk to request the Client Record Request Dashboard for the client

Item 3. Attachment B

Orange County HMIS Policies and Procedures

- within five (5) business days of the request except were exempted by state and federal law.
- ii. At the time of the request, the Agency Administrator must decide with the client an appropriate method for the client to receive their dashboard that does not violate the privacy of the client's data.
- iii. The HMIS Help Desk will respond to the request as outlined in the HMIS Help Desk Policies section.
- iv. An Agency Administrator at the agency is required to review the dashboard with the client upon request.
- c. No client shall have access to another client's data for any reason, except for parents or guardians of a minor requesting their minor child's records.

XIII. Data Use and Disclosure

- a. Client data may be used or disclosed for system administration, technical support, program compliance, analytical use, and other purposes as required by law. Uses involve sharing parts of client information with persons within an organization. Disclosures involve sharing parts of client information with persons or organizations outside an organization.
- b. Participating Agencies may use data contained in the system to support the delivery of services to clients experiencing homelessness in Orange County. Organizations may use or disclose client information for administrative functions, technical support, and management purposes. Participating Organizations may also use client information for internal analysis, such as analyzing client outcomes to evaluate programs.
- c. The vendor and any authorized subcontractor shall not use or disclose data stored in the OCHMIS without expressed written permission in order to enforce information security protocols. If granted permission, the data will only be used in the context of interpreting data for research and system troubleshooting purposes. The Service and License Agreement signed individually by each Continuum and vendor contain language that prohibits access to the data stored in the software except under the conditions noted above.

XIV. Data Release

- a. Data release refers to the dissemination of aggregate or anonymous client-level data for the purposes of system administration, technical support, program compliance, and analytical use.
- b. No identifiable client data, including but not limited to name, Social Security Number, or Date of Birth, will be released by the HMIS Lead Agency or any Participating Organizations to any person, agency, or organization not participating in HMIS for any purpose without written permission from the client, with the exception of subpoenas, academic research purposes or other circumstances as required by law.
- c. Each Participating Agency owns their own data that is stored in the system. The agency may not release personal identifiable client data without written permission from the client. Agencies may release aggregate data for all clients to whom the agency provided services. Aggregate data is data that has been collected from different clients and compiled into sums. Agencies may share this data for their agency as a whole, or for each of their projects.
- d. Coordinated Entry data is owned by the CES Lead.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

- e. The Orange County CoC may release aggregate data about its own continuum at the program, sub-regional, and regional level. Aggregate data may be released without organization permission at the discretion of the CoC.
- f. Requests for regional or sub-regional data, including data for Academic Research Purposes, must be reviewed and approved by the CoC Board prior to the data being released if the request has not been pre-approved according to the Data Request Matrix below. If the request is pre-approved, the CoC Board will be notified that data has been shared.
- g. Requests for data must be submitted to the HMIS Lead Agency by submitting the [Data Request Form](#), which includes the information below.
 - a. Requestor's Name
 - b. Requestor's Organization
 - c. Description of the data needed, including reporting period and specific data elements
 - d. Description of what the data will be used for (research, media use, etc)
 - e. Will this data be published? If yes, where?
 - f. When is the data needed by?
 - g. How often is this data needed?
- h. Data Requests for Academic Research Purposes may include personal protected information if the research is being conducted by:
 - a. An individual employed by or affiliated with an HMIS participating agency for use in a research project conducted under a written research agreement approved in writing by the CoC Collaborative Applicant; or
 - b. By an institution for use in a research project conducted under a written research agreement approved in writing by the CoC Collaborative Applicant.
 - c. A research agreement must:
 - i. Establish rules and limitations for the processing and security of personal protected information in the course of the research;
 - ii. Provide for the return or proper disposal of all personal protected information at the conclusion of the research;
 - iii. Restrict additional use or disclosure of personal protected information, except where required by law; and
 - iv. Require that the recipient of data formally agree to comply with all terms and conditions of the agreement.
- i. Data Requests that seek clarification or require a subset of data that has already been published in the form of a dashboard or as part of another data request as approved by the CoC Board may be provided by the HMIS Lead Agency in consultation with the CoC Collaborative Applicant.

Data Request Matrix

Data Request Criteria	HMIS Participating Agency	Entity Does not Participate in HMIS	CoC Board Sub-Committee/Work Group	CES Administrators ¹
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¹ CES Administrators include the Agency Administrators at agencies that have been contracted by the CES Lead to manage and facilitate the Coordinated Entry System in HMIS.

Item 3. Attachment B

Orange County HMIS Policies and Procedures

	Approved	Needs Approval	Approved	Needs Approval	Approved	Needs Approval	Approved	Needs Approval
Aggregate system level data	X			X	X		X	
Program Descriptor data ²		X		X	X		X	
Client-level data ³		X		X		X		X
Ongoing data requests	X			X		X	X	
For use as research		X		X	X			X
For media release		X		X		X		X
For other public use		X		X		X		X

XV. Data Breach

- a. A data breach is the unauthorized access or acquisition of data that compromises the security, confidentiality, or integrity of data in HMIS. Data may be in any format (electronic, hardcopy or verbal) and may range from a single piece of data and/or an entire data system.
- b. Breaches to the HMIS servers are managed by the HMIS vendor. If a breach to the HMIS servers occurs, the HMIS vendor will notify the HMIS Lead, and the HMIS Lead Agency will notify the participating agencies as appropriate.
- c. Breaches may also occur at participating agencies. The participating agency is responsible for immediately mitigating the data breach to the extent possible as soon as the breach is identified, including notifying clients who may have been impacted by this breach. Data breaches could include but are not limited to:
 - a. HMIS users sharing HMIS account and/or passwords with others.
 - b. Sharing client identifying information with anyone that doesn't have access to HMIS or hasn't been approved to access that data.
 - c. Sharing client identifying information over an unencrypted network.
 - d. Leaving printed documents with client identifying information in an unsecured location.
- d. Any suspected data breach must be reported to the HMIS Lead Agency by submitting the [Data Breach Incident Report](#). The HMIS Lead Agency will review the breach and the mitigating actions taken by the agency, and will assist with any additional action that may be needed.
- e. The HMIS Lead Agency will report all data breaches to the Agency Access Working Group, and that group will determine if any corrective action is needed. Corrective action may include but is not limited to notifying the CoC Board, CoC Lead, and funders of the agency, and revoking HMIS access.

² Project descriptor data elements (PDDE) are intended to identify the organization, specific project, and project details for each project participating in HMIS. Approved entities may request PDDE for any projects in HMIS.

³ Client-level data requests from CES Administrators and CoC Board Sub-Committees or Work Groups should be submitted through the HMIS Help Desk, and will be reviewed and approved by the CoC Manager, the CES Lead, and the HMIS Lead.

XVI. Data Integration

- a. Data integration is the process of exporting data from one data system and importing it into another. For the purposes of this policy, data import is the process of taking data from an outside case management database and importing it into HMIS, and data export is the process of taking data out of HMIS and importing it into an outside case management database.
- b. Requests for data import or export must be submitted through the [Data Integration Request Form](#). Agencies requesting exports of their own data do not require approval from the CoC Board. All other requests are decided by the CoC Board in conjunction with the CoC Lead and the HMIS Lead. Requests must demonstrate how the data integration will improve care coordination for clients in order to be considered.
- c. Consult the current [HUD Data Dictionary and HUD Data Standards Manual](#) for HUD standard fields collected in HMIS. All imports must be in [HUD CSV Format](#) unless otherwise approved by the HMIS Lead.
- d. Agencies wishing to request any data integration with OC HMIS must agree to the following policies. The Requesting Agency and/or Outside Database Vendor must sign an MOU prior to any work being completed.
 - a. Prior to transferring any data, the HMIS Lead Agency will conduct an Agency/Vendor Review which may include but is not limited to privacy, security, data sharing, data storage, data timeliness, data completeness, and data collection practices.
 - b. All approved data integrations are subject to an annual review by the HMIS Lead, CoC Lead, and CoC Board. This review will include a certification to ensure the data integration is in compliance with the HMIS Policies and Procedures, and that the items included in the Agency/Vendor Review are still in effect. The review will also consider if the data integration is still necessary and favorable for the Continuum of Care. If the data integration is no longer considered necessary or if the audit is failed, the data integration will be terminated.
 - c. Violation of any of the policies and procedures in this document may be grounds for termination of the data integration at any time, and is at the discretion of the HMIS Lead. The CoC Board will be notified of any data integrations that have been terminated.
 - d. The HMIS Lead Agency will provide an estimate for implementation and maintenance fees upon receiving the appropriate data integration request form. If the CoC chooses not to cover these fees, they will become the responsibility of the agency requesting the data integration. Fees will be updated annually by the HMIS Lead Agency.
 - e. The Requesting Agency and Outside Database Vendor must agree to the Roles and Responsibilities outlined in this policy as applicable.
 - f. Data integrations are subject to all policies and procedures outlined in this document. Imported data is owned by the agency responsible for managing the data in HMIS.
 - g. Data integration projects approved by the CoC Board will be scheduled to accommodate the current workload of the HMIS Lead. Scheduling is at the discretion of the HMIS Lead.
- e. A critical component of data integration is understanding the responsibilities of those involved in the process. The following participants may be involved in the data integration process. Please review the tables below for the expected responsibilities for each participant. The

Item 3. Attachment B

Orange County HMIS Policies and Procedures

responsibilities are subject to change and will be finalized when the project plan for the data integration is developed.

- a. HMIS Lead: HMIS administrator for the Orange County CoC
- b. Requesting Agency: The Provider that is serving clients directly, and is the responsible party for the data. If the Requesting Agency is requesting a data import, the agency must be participating in HMIS, and must be in compliance with all policies and procedures outlined in this document. If the agency is not already participating in HMIS and does not meet the criteria outlined in the Agency Access section, the agency must submit the Agency Access Application and be approved to access HMIS prior to submitting the Data Import/Export Request Form.
- c. Outside Database Vendor: The entity that provides the technical and administrative support for the outside database. This entity will not be given direct access to HMIS.

Importing Data into HMIS	
Task	Responsibility
Submit Data Integration Request Form	Requesting Agency
Determine specifications of import into HMIS (frequency, report parameters, data elements, report format, etc.)	HMIS Lead Agency/Requesting Agency
Develop project plan	HMIS Lead Agency
Review privacy/consent practices for outside database to ensure client consent to share data in HMIS	HMIS Lead Agency
Review outside database for proper collection of HUD required data and/or custom data	HMIS Lead Agency
Format/prepare data in approved format	Requesting Agency
Review prepared data for accuracy and completeness	Requesting Agency
Submit prepared data in approved submission process	Requesting Agency
Review data from agency for proper format and completeness	HMIS Lead Agency
Complete import of data into HMIS	HMIS Lead Agency
Review imported data in HMIS and review accuracy/completeness	Requesting Agency
Report any data imported incorrectly to HMIS Lead	Requesting Agency
Resolve any issues with import file or requesting database and resend data as needed	Requesting Agency
Resolve any issues with HMIS import and re-upload data as needed	HMIS Lead Agency

Exporting Data from HMIS	
Task	Responsibility
Submit Data Integration Request Form	Requesting Agency
Determine specifications of export from HMIS (frequency, report parameters, data elements, report format, etc.)	Outside Database Vendor/HMIS Lead/Requesting Agency
Develop project plan	HMIS Lead Agency

Item 3. Attachment B

Orange County HMIS Policies and Procedures

Represent and warrant software is in compliance with best practice policies for privacy and security practices	Outside Database Vendor
Represent and warrant software is in compliance with best practice policies for access roles and data sharing	Outside Database Vendor
Represent and warrant software is in compliance with best practice policies for data storage and security infrastructure	Outside Database Vendor
Review agencies/users that will have access to data to ensure compliance with HMIS Policies and Procedures	HMIS Lead Agency
Ensure HMIS Consent Form and related documents name outside database/vendor for transparency	HMIS Lead Agency
Create export file and/or export data from HMIS as needed	HMIS Lead Agency
Import data into outside database	Outside Database Vendor
Review imported data in outside database for accuracy/completeness	Outside Database Vendor/Requesting Agency
Notify HMIS Lead Agency of any errors with export data	Outside Database Vendor/Requesting Agency
Resolve any issues with HMIS export and resend data as needed	HMIS Lead Agency
Resolve any issues with outside database import as needed	Outside Database Vendor

Item 3. Attachment C

Revised 06/2024

Orange County Continuum of Care Homeless Management Information System Client Consent form

Welcome to the Orange County Continuum of Care (CoC).

You are currently accessing services from a service provider/organization participating in the Orange County Homeless Management Information System (HMIS). HMIS is the secure database used to collect and store information about clients served through this service provider/organization. It also allows the sharing of information among HMIS participating entities to streamline access to services and help them understand a client's history of homelessness or housing instability. HMIS is managed and operated by Orange County United Way's 2-1-1 Orange County (211OC).

In Orange County, all entities that participate in HMIS share data with each other to coordinate care and improve program outcomes. If you agree to participate in HMIS, this means you allow information gathered by a participating service provider/organization to be entered into HMIS and allow all other participating entities to view and use your data to provide services to you. Additionally, the service provider/organization will also be able to see what kind of services in Orange County you have received in the past.

A complete list of all entities that participate in the HMIS is maintained at <http://ochmis.org/about-hmis/contributing-agencies/>. You can also ask the service provider/organization you are receiving services from for a list of HMIS participating entities. Please note that the list of entities contributing data to HMIS can change frequently and without notice, and therefore the website should be consulted for the most recent list.

HMIS contains sensitive health and personal data. The Orange County CoC and HMIS participating entities take your privacy very seriously and have implemented **the following protections to safeguard your data:**

- Individual client data is only viewable by trained staff at each participating service provider/organization.
- In order to participate in the HMIS, leaders at each agency must sign an Agency Agreement that includes a commitment to protecting client data and maintaining confidentiality.
- In order to use HMIS, agency staff must complete multiple trainings that examines privacy laws and the importance of client privacy.
- The HMIS is hosted on a secure server and data is encrypted.

What information is shared in the HMIS database?

We share Protected Personal Information (PPI), Protected Health Information (PHI), and general information obtained during your intake, assessment, and enrollment in the program. This may include, without limitation, the following:

- Your name and your contact information
- Your social security number and date of birth
- Your basic demographic information such as gender, race and ethnicity
- Your history of homelessness and housing (including your current housing status, and where and when you have accessed services)
- Your medical history and disabling conditions, including mental and physical health concerns, substance abuse history, and HIV/AIDS status
- Your case notes and services
- Your income sources and amounts
- Your non-cash benefits
- Your veteran status, service history and discharge status
- Information about other members of your household
- Your self-reported history of domestic violence
- Verification of history of homelessness and/or disabling conditions (including third-party verifications and/or self-attestations)
- Your photo (optional)

By signing this form, you understand the following:

If you feel any of your rights outlined in this document have been violated, please contact (714) 589-2360.

Item 3. Attachment C

- You have the right to receive services even if you do not sign this consent form. Providers may not refuse to provide you with services based on your refusal to sign this form.
- You have the right to receive a copy of this consent form for your records.
- Your consent permits your data be entered in HMIS and allows any participating entities to view your history of homelessness and service utilization, add to or update your information in HMIS without asking you to sign another consent form. This consent form expires seven (7) years after the signature or at any time you choose to revoke your consent. Please note, the Orange County CoC is required to retain all data stored in HMIS for seven (7) years after the data was created or last changed. However, stored data will not be further shared upon the expiration of your consent.
- You may revoke your consent to share your information with other HMIS participating entities at any time. Your revocation must be provided either in writing or by completing the Revocation of Consent form. The service provider/organization you are receiving services from must make this form available to you if you ask, and it should be out and available for you to take from the office or facility you receive services from. Upon receipt of your revocation, 211OC will remove your PPI and PHI from the shared HMIS database and prevent further PPI and PHI from being added. However, the PPI and PHI that you previously authorized to be shared cannot be entirely removed from the HMIS database. This information, as described previously, will remain accessible to the entities that provided you with direct services.
- Participating agencies are required to post a Privacy Notice at each location where intakes are completed. The Privacy Notice contains more detailed information about how your information may be used and disclosed and should be readily available to you and conspicuously posted at all participating service provider/organization locations. You have the right to receive a copy of this notice for your records.
- You have the right to request, in writing, the following pieces of information. This information is to be provided to you within five (5) business days of your request.
 - A correction of inaccurate or incomplete PPI and/or PHI
 - A copy of your consent form
 - A copy of your HMIS record (agency staff must review this information with you if you request such a review so that you can fully understand the information presented to you and how it is used)
- Aggregate or statistical data that is released from the HMIS database will not disclose any of your PPI or PHI
- You are not waiving any rights protected under Federal and/or California law.

SIGNATURE AND ACKNOWLEDGEMENT

Your signature indicates that you have read (or been read) this consent form, have received answers to your questions, and you freely consent to have your information, and that of your minor children (if applicable and/or if you choose to include them), entered into the HMIS database. You also consent to share your information with other participating organizations as described in this consent form.

Client Name: _____ Date Of Birth (DOB): ___/___/_____

Signature: _____ Date Signed: ___/___/_____

Minor Children (if applicable and/or if you choose to include them):

Name: _____ DOB: ___/___/_____ Name: _____ DOB: ___/___/_____

Name: _____ DOB: ___/___/_____ Name: _____ DOB: ___/___/_____

Agency Staff Signature:

Agency Staff Name: _____ Agency Staff Signature: _____

Agency Name: _____ Date: ___/___/_____

If you feel any of your rights outlined in this document have been violated, please contact (714) 589-2360.

Item 3. Attachment C

Revised 06/2024

Orange County Continuum of Care Homeless Management Information System Participating Entities

Please note that the list of service providers/organizations contributing data to HMIS can change frequently and without notice, and therefore the website should be consulted for the most recent list – <http://ochmis.org/about-hmis/contributing-agencies/>.

The following service providers/organizations are participating in the Homeless Management Information System (HMIS). These service providers/organizations have the ability to enter data into HMIS and also view the client's information previously entered by other HMIS participating service providers/organizations, including utilization of homeless services in Orange County.

1736 Family Crisis Center	
211 OC	
American Family Housing	
Anaheim Housing Authority	
APAIT	
Asian American Senior Citizens Service Center	
Be Well OC	
CalOptima	
Casa Teresa	
Casa Youth Shelter	
City Net	
City of Brea	
City of Buena Park	
City of Costa Mesa	
City of Dana Point	
City of Garden Grove	
City of Huntington Beach	
City of La Habra	
City of Newport Beach	
City of San Clemente	
City of San Juan Capistrano	
City of Stanton	
City of Westminster	
Colette's Children's Home	
Community Action Partnership of Orange County	
County of Orange/Office of Care Coordination	
Covenant House California	
Encompass Housing	
Families Forward	
Families Together of Orange County	
Family Assistance Ministries	
Family Promise of Orange County	
Family Solutions Collaborative	
Friendship Shelter	
Grandma's House of Hope	
Health Care Agency – Behavioral Health Services	
Healthcare In Action	
Helping HandUps	
	HIS-OC
	Hope Center of Orange County
	Housing for Health Orange County
	Hub Resource Center
	Illumination Foundation
	Jamboree
	JMh – Anaheim Foundation
	Last Is First Philanthropies
	Leading Purpose
	Lutheran Social Services of Southern California
	Mental Health Association
	Mercy House
	Moving Forward Psychological Institute, Inc.
	New Directions for Veterans
	Nurturing Care LLC
	OC Rescue Mission
	Orange County Asian and Pacific Islander Community Alliance
	Orange County Housing Authority
	Orange County United Way
	People Assisting the Homeless (PATH)
	Pathways of Hope
	Project Kinship
	Radiant Health Centers
	Salvation Army
	Santa Ana Housing Authority
	Share Our Selves
	South County Outreach
	SPIN
	StandUp for Kids
	The Orangewood Foundation
	Thomas House
	US Veterans Initiative
	Volunteers of America Los Angeles (VOALA)
	Waymakers
	We Care Los Alamitos
	WISEPlace

The following service providers/organizations have restricted access in HMIS. This means that the entities are limited to only entering data into HMIS are not able to view client's history, files, project enrollments, etc.

Santa Ana Police Department

If you feel any of your rights outlined in this document have been violated, please contact (714) 589-2360.

HMIS Policies and Procedures Updates



Background

- The HMIS Policies and Procedures is reviewed and updated on an annual basis
- The HMIS Working Group met 4 times from January through March to review and provide feedback
 - The working group reviews the entire P & P and proposes changes
 - The HMIS Lead provides questions for consideration based on feedback from the CoC and scenarios that have occurred
- HMIS Lead hosted a listening session and released a survey to collect feedback regarding agency access policy
- The draft Policies and Procedures were presented to the Lived Experience Advisory Committee June 5th
- A user feedback period occurred from June 6th to June 21st
- The final draft of the Policies and Procedures were presented to the Policies, Procedures, and Standards Committee July 31st

Working Group Members

- Last is First Philanthropies
- PATH
- Pathways of Hope
- Salvation Army
- U.S. Veterans Initiative
- Families Forward
- Family Assistance Ministries
- Mental Health Association
- Mercy House

Working Group Feedback

- Develop training for new agencies joining HMIS
- Minimum term commitment to participate in the Agency Access Working Group
- Highlight agencies on the HMIS website that pass the agency audit on the first attempt
- Develop policy for agencies unresponsive to audits
- Agencies approved for HMIS access have 90 days to begin participating in HMIS

Lived Experience Advisory Committee Feedback

- Agencies unresponsive to scheduling the audits should be required to pay an additional fee
- Remove the term “entity” from the Consent to Share Protected Information form
- Agencies serving homeless clients should be required to participate in HMIS

User Feedback

- Changing “entity” to “service provider/organization” on the Consent to Share Protected Information form is a great idea and is much more trauma-informed
- Include a synopsis of the Consent to Share Protected Information form that is easy for clients to understand

PPS Committee Feedback

- The number and percentage of agencies that passed the audit on the first vs. second attempt should be included when audit results are published
- Research what information clients are entitled to see from their HMIS record and update the Client Record Request policy if needed

Minor Revisions

- Updated Key Terms & Acronyms with HUD Data Standards changes
- Updated HMIS Lead to Orange County United Way to reflect acquisition of 211 Orange County
- Incorporated Agency Access Working Group policy into Agency Access policy
- Grammatical corrections and clarifying language throughout

Updated Policy: Agency Access

- Victim Service Providers receiving CoC Program funds or ESG Program funds may request up to five licenses for read-only access in HMIS for the purpose of care coordination. The provider will be required to pay the User Fee for 1 – 5 users as outlined in the Participating Agency Requirements section.
- Organizations that are required to submit the Agency Access Application will be required to complete an online course to understand HMIS requirements
- Agencies approved for access must begin entering data into HMIS within 90 days of approval

Updated Policy: Agency Access WG Qualifications

- Have the availability to commit to serve a minimum term of one year

Updated Policy: Agency Audits

- After 2 unsuccessful attempts to contact the agency the HMIS Lead Agency will reach out to the agency's leadership.
 - If the agency remains unresponsive after attempting to contact the agency's leadership twice the agency will fail the audit for that year.
- If any deficiencies are found in the audit, the Agency Administrator and the HMIS Lead Agency staff person will agree upon a date that the issue should be resolved by. If the corrections are not made by the agreed upon date, the agency will fail the audit for that year.

Updated Policy: Agency Audits

- Agencies that fail their audit will be reviewed by the HMIS Access Ad Hoc to determine the appropriateness of the agency's continued participation in the OC HMIS, and the agency may have HMIS Access revoked.
- Agencies that pass their HMIS Annual Audit will be recognized on the OC HMIS Website.

Updated Policy: User Licenses

- Agencies may request standalone Looker licenses for the purposes of scheduling ad hoc reports to be sent to a secure location outside of HMIS. The fee for these licenses is \$1,236 per license annually, and is subject to change per vendor licensing fee. This functionality is optional, and not necessary to access the agency's data in HMIS.

Updated Policy: Reporting Requirements

- Emergency Shelter, Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, and Other Permanent Housing projects are required to participate in the Housing Inventory Count (HIC) that occurs annually on one day during the last 10 days of January.
- Emergency Shelter and Transitional Housing projects are required to participate in the Sheltered Point in Time Count (PIT) that occurs annually on one day during the last 10 days of January.

Updated Policy: Reporting Requirements

- The System Performance Measures report (SPM) is submitted to HUD on an annual basis, and includes Street Outreach, Emergency Shelter, Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, and Other Permanent Housing projects. The reporting period for this report is October 1st through September 30th.
- The Longitudinal Systems Analysis (LSA) is submitted to HUD on an annual basis, and includes Emergency Shelter, Transitional Housing, Rapid Re-Housing, and Permanent Supportive Housing projects. The reporting period for this report is October 1st through September 30th.

New: Agency Requirements Schedule

Requirement Type	Requirement Name	Estimated Start Date	Estimated Agency Due Date	Estimated HUD Due Date	Estimated Publication Date	January	February	March	April	May	June	July	August	September	October	November	December
HUD Required Reports	System Performance Measures Report (SPM)	October	November	February	March												
	Longitudinal Systems Analysis (LSA)	October	December	January	April												
	Housing Inventory Count (HIC)	January	February	April	May												
	Sheltered Point in Time (PIT)	January	February	April	May												
Orange County Required Reports	Street Outreach Project Performance Reports	June, December	July, January	n/a	August, February												
	Emergency Shelter Project Performance Reports	May, November	June, December	n/a	July, January												
	Transitional Housing Project Performance Reports	April, October	May, November	n/a	June, December												
	Rapid Re-Housing Project Performance Reports	March, September	April, October	n/a	May, November												
	Homelessness Prevention Project Performance Reports	January, July	February, August	n/a	March, September												
	Permanent Supportive Housing/Other Permanent Housing Project Performance Reports	February, August	March, September	n/a	April, October												
	Data Quality Report Cards	January, April, July, October	January, April, July, October	n/a	February, May, August, November												
Orange County Requirement	Agency Audits	June	Specific to each agency	n/a	n/a												
	HMIS User Recertifications	July	August	n/a	n/a												
HMIS Lead Meetings	HMIS User Meeting	Monthly meetings on 1st Wednesday @ 10:00	n/a	n/a	n/a												
	Data & Performance Management Meeting	Quarterly meetings on 2nd Wednesday @ 10:00	n/a	n/a	n/a												

Updated Policy: User Requirements

- HMIS Recertification – OC HMIS Users are required to complete an annual HMIS Recertification Training to reinforce HMIS data entry functionality.

New Policy: Remote Work

- Agency must adhere and be consistent with the agency's expectations of information security for staff working at the office full-time. Staff who work remotely will be expected to ensure the protection of proprietary agency and client information accessible from their remote office. Steps include, but are not limited to, the use of locked file cabinets, computers and desks; the regular maintenance of passwords; and any other steps appropriate for the job and the environment. Agency should be at a minimum in compliance with OC HMIS Technical Standards policies and the policies outlined in this document.

Updated Policy: Client Record Request

- Clients will only be given access to review the data included in the Client Record Request Dashboard

Updated Policy: Client Consent Form

- Replace “entity” with “Service Provider/Organization”



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? HOUSING INTEREST

Please select which of the following types of housing opportunities you are interested in. *General descriptions of each housing type are listed below to help guide your decision.* You may select up to three, and you will only be considered for the types you select.

Rapid Re-Housing (RRH) Yes No

- **Rental Assistance:** Time limited rental assistance of varying lengths:
 - Short-Term Up to 6 months
 - Medium-Term Up to 12 months
 - Long-Term Up to 24 months
- **Supportive Services:** Time limited supportive services
- **Income:** There is no minimum income requirement for participating in RRH. Participants will pay the full rent after the assistance ends.
- **Goal:** The goal of RRH is to help households increase or maintain income to be able to keep paying rent after the rental assistance ends.

Housing Choice Voucher (HCV) Yes No

- **Rental Assistance:** Ongoing rental assistance
- **Supportive Services:** Minimal to no supportive services
- **Income:** Income requirements vary. There may be a required financial contribution from the participant, based on any income the participant has.
- **Goal:** The goal of the HCV program is to help households without sufficient income to sustain housing without assistance obtain housing.

Permanent Supportive Housing (PSH) Yes No

- **Rental Assistance:** Ongoing rental assistance
- **Supportive Services:** Ongoing voluntary supportive services
- **Income:** Income requirements vary. There may be a required financial contribution from the participant based on any income the participant has.
- **Goal:** The goal of PSH is to help households that face greater barriers, typically households experiencing chronic homelessness, obtain and keep affordable housing.

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

HOUSING INTEREST

Please select which of the following types of housing opportunities you are interested in. General descriptions of each housing type are listed below to help guide your decision. You may select up to three, and you will only be considered for the types you select.

Rapid Re-Housing (RRH) Yes No

- **Rental Assistance:** Time limited rental assistance of varying lengths:
 - Short-Term Up to 6 months
 - Medium-Term Up to 12 months
 - Long-Term Up to 24 months
- **Supportive Services:** Time limited supportive services
- **Income:** There is no minimum income requirement for participating in RRH. Participants will pay the full rent after the assistance ends.
- **Goal:** The goal of RRH is to help households increase or maintain income to be able to keep paying rent after the rental assistance ends.

Housing Choice Voucher (HCV) Yes No

- **Rental Assistance:** Ongoing rental assistance
- **Supportive Services:** Minimal to no supportive services
- **Income:** Income requirements vary. There may be a required financial contribution from the participant, based on any income the participant has.
- **Goal:** The goal of the HCV program is to help households without sufficient income to sustain housing without assistance obtain housing.

Permanent Supportive Housing (PSH) Yes No

- **Rental Assistance:** Ongoing rental assistance
- **Supportive Services:** Ongoing voluntary supportive services
- **Income:** Income requirements vary. There may be a required financial contribution from the participant based on any income the participant has.
- **Goal:** The goal of PSH is to help households that face greater barriers, typically households experiencing chronic homelessness, obtain and keep affordable housing.

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.

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

Item 3. Attachment G

2024 COORDINATED ENTRY SYSTEM (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 CES Housing Assessment was then presented to the Policies, Procedures and Standards (PPS) Committee on May 14, 2024, and the accessibility questions were approved. A portion of the CES Housing Assessment returned to the CES Steering Committee on July 3, 2024, with feedback from the PPS Committee and requests for additional review of the housing opportunity description. The feedback below was received during the LEAC meeting, the May and July 2024 CES Steering Committee Meetings, the PPS Committee, 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.

Item 2. Attachment G

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.

Yes, I over looked the draft, looks good.

Feedback

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

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.

It could be helpful to add links to reference guides on how to use the assessment.

Office of Care Coordination to look into adding a table comparing the housing options.

The descriptions could contain more information on eligibility requirements.

Clients selecting opportunities they are not interested in can slow down the match process.

Income requirement language should be consistent across all descriptions or be removed.

It's important to have clear language around eligibility.

It's crucial to let clients know they could miss out on an opportunity if they do not miss the boxes.

Item 5. Attachment A

FY2024 and FY 2025 Continuum of Care (CoC) Program Notice of Funding Opportunity (NOFO) Overview

Overview

The U.S. Department of Housing and Urban Development (HUD) announced the release of the Fiscal Year (FY) 2024 and FY 2025 Continuum of Care (CoC) Competition Notice of Funding Opportunity (NOFO) on July 31, 2024. HUD is awarding \$3,524,000,000 in the FY 2024 and FY 2025 CoC Competition NOFO, including up to \$52 million available for Domestic Violence, Dating Violence, Sexual Assault, and Stalking Bonus (DV Bonus) projects. The NOFO for the FY 2024 and FY 2025 CoC Program Competition is available on [Grants.gov](https://www.grants.gov) and the [Funding Opportunities](#) page on HUD's website. The submission deadline for the FY 2024 and 2025 CoC Program NOFO is October 30, 2024, at 5:00 p.m. PDT.

For the first time, HUD is issuing a 2-year CoC Program NOFO as authorized by the consolidated Appropriations Act, 2024. Communities are only required to submit one CoC Consolidated Application that will be applicable for FY 2024 and FY 2025 funds, along with the FY 2024 CoC Priority Listing. In FY 2025, Collaborative Applicants will be required to submit a FY 2025 Priority Listing that includes all projects that were not awarded FY 2024 funds and are approved by the CoC to apply for FY 2025 funding. This change will streamline the application process and significantly reduce the administrative burden on applicants.

Timeline:

- **Wednesday, July 31, 2024** – Funding opportunity announcement released by HUD.
- **Tuesday, September 30, 2024** – Project Applications are required to be submitted to the CoC no later than 30 days before the application deadline.
- **Wednesday, October 15, 2024** – CoCs are required to notify all project applicants who submitted their project applications to the CoC by the CoC-established deadline whether their project application(s) will be accepted and ranked on the CoC Priority Listing, rejected, or reduced by the CoC no later than 15 days before the FY 2024 CoC Program application submission deadline.
- **Monday, October 28, 2024** – Post the Consolidated Application for community review, including the CoC application, attachments, priority listings and community notifications. CoCs are required to post Consolidated Application for the CoC no later than two days before the application submission deadline.
- **Thursday, October 30, 2024** – Application submission deadline

Available Funds:

- Approximately \$3,524,000,000 nationwide
 - \$52,000,000 for DV Bonus projects
 - \$188,000,000 available non-competitive renewal and replacement of expiring Youth Homelessness Demonstration Program (YHDP) grants
 - A portion of funds will be available for CoC Renewal Projects. CoC Renewal Projects applications must be submitted by the same recipient that signed the executed grant agreement for the grant being renewed, or entity that became the recipient through a grant agreement transfer amendment.

Item 5. Attachment A

- A portion of funds will be available for CoC Bonus Projects. The CoC Bonus allows CoCs to use up to 12 percent of their Final Pro Rata Need (FPRN) to create one or more new project applications.
- Funding Available to the Orange County CoC
 - Estimated Annual Renewal Demand (ARD) – \$32,801,133
 - CoC Bonus – \$3,936,136
 - DV Bonus – \$3,623,391
 - CoC Planning – \$1,500,000

Application Process:

- CoC Application completed and submitted by Collaborative Applicant
 - HUD will select projects based on CoC score, beginning with the highest scoring CoC to the lowest scoring CoC.
- Project Applications
 - Must describe population and subpopulations to be served
 - Must describe the type of housing and services to be provided
 - Must include budget activities that are being requested
- CoC Priority Listings
 - Ranks all project applications in order of priority, including CoC project applications YHDP renewal or replacement projects, and identify any project applications rejected by the CoC

Eligible Applicants:

- Collaborative Applicants – County of Orange’s Office of Care Coordination
- Eligible Project Applicants – include nonprofit organizations, state and local governments, instrumentalities of state and local governments, Indian Tribes and Tribally Designated Housing Entity (TDHE).

HUD's Strategic Plan Goals and Objectives

Strategic Goal 1: Support Underserved Communities
Fortify support for underserved communities and support equitable community development for all people.
1A: Advance Housing Justice
Fortify support for vulnerable populations, underserved communities, and Fair Housing enforcement.
1B: Reduce Homelessness
Strengthen Federal, State, Tribal, and community implementation of the Housing First approach to reducing the prevalence of homelessness, with the ultimate goal of ending homelessness.
1C: Invest in the Success of Communities
Promote equitable community development that generates wealth-building for underserved communities, particularly for communities of color.

Strategic Goal 2: Ensure Access to and Increase the Production of Affordable Housing
Ensure housing demand is matched by adequate production of new homes and equitable access to housing opportunities for all people.
2A: Increase the Supply of Housing

Enhance HUD’s programs that increase the production and supply of housing across the country.
2B: Improve Rental Assistance Improve rental assistance to address the need for affordable housing.

Strategic Goal 3: Promote Homeownership Promote homeownership opportunities, equitable access to credit for purchase and improvements, and wealth-building in underserved communities.
3A: Advance Sustainable Homeownership Advance the deployment of tools and capital that put sustainable homeownership within reach.
3A – Major Initiative: Expand Homeownership Opportunities Promote financing for innovative ownership models to increase the availability of affordable housing.
3B: Create a More Accessible and Inclusive Housing Finance System Advance new policy, programs, and modernization initiatives that support a more equitable housing finance system. Promote the preservation and creation of affordable housing stock.

Strategic Goal 4: Advance Sustainable Communities Advance sustainable communities by strengthening climate resilience and energy efficiency, promoting environmental justice, and recognizing housing’s role as essential to health.
4A: Guide Investment in Climate Resilience Invest in climate resilience, energy efficiency, and renewable energy across HUD programs.
4B: Strengthen Environmental Justice Reduce exposure to health risks, environmental hazards, and substandard housing, especially for low-income households and communities of color.
4C: Integrate Health and Housing Advance policies that recognize housing’s role as essential to health.

HUD Homeless Policy Priorities

- *Ending homelessness for all persons.* In 2023, the United States Interagency Council on Homelessness (USICH) presented All In: The Federal Strategic Plan to Prevent and End Homelessness to the President and Congress. The plan is built around six pillars: three foundations — equity, data and evidence, and collaboration — and three solutions — housing and supports, crisis response, and prevention. The work funded through this NOFO will support the actions and strategies proposed within the pillars. To end homelessness, CoCs should identify, engage, and effectively serve all persons experiencing homelessness. CoCs should measure their performance based on local data that consider the challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, older adults, those experiencing chronic homelessness, and people with disabilities, including those living with HIV/AIDS). CoCs should partner with housing, health care, and supportive services providers and agencies to expand housing options, such as permanent supportive housing, housing subsidies, and rapid rehousing. Additionally, CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest periods experiencing homelessness to develop housing and supportive services tailored to their needs.

Item 5. Attachment A

- *Use a Housing First approach.* Housing First prioritizes rapid placement and stabilization in permanent housing and utilizes housing as a platform for providing supportive services that improve a person’s health and well-being. CoC Program funded projects should help individuals and families move quickly into permanent housing without preconditions and ensure that participants can choose the services they need to improve their health and well-being and remain in their housing. Additionally, CoCs should engage landlords and property owners to identify housing units available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt client-centered service practices. HUD encourages CoCs to assess how well Housing First approaches are being implemented in their communities.
- *Reducing Unsheltered Homelessness.* In recent years, the number of people experiencing unsheltered homelessness has risen significantly, including a rising number of encampments in many communities across the country. People living unsheltered have high rates of physical and mental health challenges, including substance use disorders. CoCs should explore all available resources, including CoC and ESG funded assistance, housing subsidies, health care programs, and other supportive services to help improve unsheltered people’s well-being and help them move as quickly as possible to permanent housing. CoCs should work with law enforcement and their state and local governments to enlist their support for housing people residing in encampments, and to avoid practices that criminalize homelessness. Criminalization of homelessness risks the health of people living unsheltered and makes it more difficult for them to move into permanent housing. Additionally, CoCs should use their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing and services, and ensure people experiencing homelessness receive assistance quickly.
- *Improving System Performance.* CoCs should be assessing the performance of all homelessness projects using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, rates of exit to permanent housing destinations). CoCs should review all projects eligible for renewal under this FY 2024 – 2025 CoC NOFO to determine their effectiveness in serving people experiencing homelessness, including their cost-effectiveness. The CoC Competition includes several options to help CoCs improve their effectiveness, including reallocation, expansion, and transition grants, and CoC’s should take advantage of these options to improve their overall performance. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies.
- *Partnering with Housing, Health, and Service Agencies.* Using cost performance and outcome data, CoCs should improve how all available resources are utilized to end homelessness. This is especially important as the CARES Act and American Rescue Plan have provided significant new resources to help end homelessness. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and should:
- *Partnering with Housing, Health, and Service Agencies.* Using cost performance and outcome data, CoCs should improve how all available resources are utilized to end homelessness. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and should:
 - Work closely with health care systems and agencies and assist program participants to obtain health care and supportive services, including behavioral health services, including those covered and financed by Medicaid. In addition, CoCs should develop close

Item 5. Attachment A

partnerships with public health agencies to analyze data and design approaches that reduce homelessness, improve the health of people experiencing homelessness, and prevent and address disease outbreaks, including HIV/AIDS.

- Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing assistance to people experiencing homelessness. These partnerships can also help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options. CoCs and PHAs should especially work together to implement targeted programs such as HUD-VASH, Mainstream Vouchers, Family Unification Program (FUP) Vouchers, Fostering Youth Independence (FYI) Vouchers, and other housing voucher programs targeted to people experiencing homelessness. CoCs should coordinate with their state and local housing agencies on the utilization of new program resources provided through the Homelessness Assistance and Supportive Services Program (HOME-ARP) that was created through the American Rescue Plan. CoCs should also work with organizations administering other housing assistance, such as assistance provided through HUD's Section 202 and 811 programs, HUD's Project Based Rental Assistance, and U.S. Department of Agriculture's housing assistance programs.
- Partner with local workforce development centers to improve employment opportunities.
- Work with Tribal organizations to ensure that Tribal members can access CoC-funded assistance when a CoC's geographic area borders a Tribal area.
- *Racial Equity.* In nearly every community, Black, Indigenous, and other people of color are substantially over-represented in the homeless population. In this NOFO, HUD is emphasizing system and program changes to address racial equity within CoCs and projects. Responses to preventing and ending homelessness should address racial inequities to ensure successful outcomes for all persons experiencing homelessness using proven approaches, such as: partnering with a racially diverse set of community partners and people experiencing homelessness and partnering with organizations with experience serving underserved populations. CoCs should review local data, policies, procedures, and processes to identify barriers that result in racial disparities and take steps to eliminate barriers to improve racial equity and to address disparities.
- *Improving Assistance to LGBTQ+ Individuals.* Discrimination on the basis of gender identity or sexual orientation manifests differently for different individuals and often overlaps with other forms of prohibited discrimination. CoCs should address the needs of LGBTQ+, transgender, gender non-conforming, and non-binary individuals and families in their planning processes. Additionally, when considering which projects to select in their local competition to be included in their application to HUD, CoCs should ensure that all projects provide privacy, respect, safety, and access regardless of gender identity or sexual orientation. CoCs should also partner with organizations with expertise in serving LGBTQ+ populations.
- *Persons with Lived Experience/Expertise.* The people who know best what solutions will effectively end homelessness are those who are experiencing homelessness. HUD expects CoCs to include people with lived homeless expertise and experience in their local planning and decision-making processes. People with lived experience/expertise should determine how local policies may need to be revised and updated to improve the effectiveness of homelessness assistance programs,

Item 5. Attachment A

including participating in planning and oversight activities, developing local competition processes, monitoring and evaluation. CoC leaders and community partners should prioritize hiring people who have experienced homelessness in areas where their expertise is needed.

- *Building an Effective Workforce.* Homeless assistance providers need effective, well-supported staff to provide high quality assistance. Unfortunately, recruiting and retaining qualified staff for programs to assist persons experiencing homelessness has proven difficult due to low pay and the challenging nature of the work. To address this issue, HUD is applying cost of living adjustments to supportive service activities and other staffing-focused budget lines to allow CoC budgets to better keep up with rising costs. HUD also encourages CoCs to work with their funders and other community stakeholders to improve pay and support for people who work in the homelessness sector.
- *Increasing Affordable Housing Supply.* The lack of affordable housing is the main driver of homelessness. CoCs play a critical role in educating local leaders and stakeholders about the importance of increasing the supply of affordable housing and the specific consequences of the continued lack of affordable housing. CoCs should be communicating with jurisdiction leaders, including for the development of Consolidated Plans, about the harmful effects of the lack of affordable housing, and they should engage local leaders about steps such as zoning and land use reform that would increase the supply of affordable housing. This NOFO awards points to CoCs that take steps to engage local leaders about increasing affordable and accessible housing supply.

Changes from Previous Notice of Funding Opportunities:

- **Changes to Tiering.** Tier 1 is set at 90 percent of the CoC's Annual Renewal Demand (ARD).
- **2-Year NOFO.** The Consolidated Appropriations Act, 2024 authorizes HUD to issue a single 2-year NOFO for fiscal years 2024 and 2025.
 - The application and selection process for the FY 2024 funds awarded through this NOFO (the FY 2024 CoC Program and YHDP funds) will proceed much like it has in prior-year competitions. However, CoCs are only required to submit one CoC application that will be applicable to the FY 2024 and FY 2025 funds. HUD reserves the right to award available FY 2025 funds (the FY 2025 CoC program and YHDP funds) based on this NOFO competition. Projects that are awarded FY 2024 funds may be eligible for award of FY 2025 funds using their FY 2024 application submission and are not required to apply for renewal for FY 2025 funds. CoC and YHDP renewal projects expiring in calendar year (CY) 2025 (January 1, 2025, and ending December 31, 2025) are eligible to be renewed with FY 2024 CoC and YHDP funds. Projects that will be eligible for renewal with FY 2025 CoC Program and YHDP funds must have an expiration date in CY 2026 (January 1, 2026, and ending December 31, 2026). Should there not be sufficient appropriated amounts to fully fund all FY 2025 renewal grants, grant amounts may be reduced proportionately. If new competitive funding becomes available for FY 2025, this NOFO may be amended and the FY 2024 - 2025 CoC Application and score may be used for the FY 2025 application selection process. Applications for FY 2025 eligible CoC and/or YHDP renewal projects and new projects created through CoC and/or DV reallocation or YHDP replacement, must be submitted in e-snaps by the application submission deadline for FY 2025 CoC and YHDP funds on August 29, 2025. HUD also reserves the right to modify this NOFO or issue a

Item 5. Attachment A

supplemental FY 2025 CoC and YHDP NOFO if necessary (e.g., to accommodate a new CoC or YHDP priority or new funding source).

- **Funding for Specific Subpopulations.** The House and Senate Committees on Appropriations expressed that for projects awarded for specific subpopulations (e.g., homeless youth or survivors of domestic violence, dating violence, sexual assault or stalking), before funding for such projects may be reallocated to other populations, HUD must consult with relevant stakeholders. For the FY 2024 funds, HUD requires funding reallocated from projects previously funded with YHDP or DV Bonus funding to be used for projects serving the same subpopulation.
- **DV Reallocation and YHDP Replacement.** In this NOFO, HUD has expanded reallocation to include DV Reallocation and has expanded the definition of YHDP Replacement to include YHDP Reallocation. HUD establishes these terms to distinguish between funding sources that must continue to serve the same populations of the projects being reallocated or, in the case of YHDP, replaced.
- **Special YHDP Activities.** In the FY 2024 – 2025 CoC NOFO, YHDP Renewal projects and YHDP Replacement projects (including YHDP Reallocation) may include requests to include special YHDP activities, subject to the requirements in section III.B.4.b.(5) of this NOFO.
- **Cost of Living Adjustments for Conditionally Selected Grants.** The Consolidated Appropriations Act, 2024 authorizes HUD to make reasonable cost of living adjustments to renewal amounts to help afford increasing cost of operations due to inflation. See section V.D below.

HUD Funding Process – Application Review and Ranking Process:

- Project applications submitted to the CoC will be reviewed and either accepted and ranked, approved, or rejected by the CoC.
- HUD will continue the Tier 1 and 2 funding selection process. Higher ranked projects will be assigned to Tier 1 and lower ranked projects will be assigned to Tier 2. The purpose of this two-tiered approach is for CoCs to notify HUD which projects are prioritized for funding based on local needs and gaps.
- HUD will establish each CoC's Tier 1 and Tier 2 amounts based on the total amount of funds requested by eligible renewal project applications on the Renewal Project Listing combined with the eligible renewal project amount(s) that were reallocated as listed on the reallocation forms in the CoC Priority Listing.
- Exact funding allocation available to the Orange County CoC for Tier 1 and Tier 2 will be announced when HUD publishes the Estimated ARD Report.
- Tier 1
 - **Tier 1 is equal to 90 percent of the CoC's ARD: \$29,521,019.70**
 - Project applications in Tier 1 will be conditionally selected from the highest scoring CoC to the lowest scoring CoC, provided the project applications pass both project eligibility and project quality threshold review, and if applicable, project renewal threshold. Any type of new or renewal project application can be placed in Tier 1.
- Tier 2
 - Tier 2 is the difference between Tier 1 and the maximum amount of CoC Renewal (including DV Renewal), CoC Reallocation, DV Bonus, DV Reallocation, and CoC Bonus funds that a CoC applies for.

Item 5. Attachment A

- HUD will award a point value to each new, renewal, YHDP Renewal and YHDP Replacement project application that is in Tier 2 using a 100-point scale:
 - **CoC Score.** Up to 50 points in direct proportion to the score received on the CoC Application
 - **CoC Project Ranking.** Up to 40 points for the CoC's ranking of the project application(s). To consider the CoCs ranking of projects, HUD will assign point values directly related to the CoCs' ranking of project applications. The calculation of point values will be 40 times the quantity $(1-x)$ where x is the ratio of the cumulative funding requests for all projects or portions of projects ranked higher by the CoC in Tier 2 plus one half of the funding of the project of interest to the total amount of funding available in Tier 2 for the CoC.
 - **Commitment to Housing First.** Up to 10 points based on the project application's commitment to follow a Housing First approach. Dedicated HMIS projects and supportive service only for coordinated entry (SSO-CE) projects will automatically receive 10 points.
- Straddling Tiers
 - If a project application straddles the Tier 1 and Tier 2 funding line, HUD will conditionally select the project up to the amount of funding that falls within Tier 1. Using the 100-point scale value described above, HUD may fund the Tier 2 portion of the project. If HUD does not fund the Tier 2 portion of the project, HUD may award the project at the reduced amount based on the amount of funding that falls within Tier 1, provided the project is still feasible with the reduced funding.

Opportunities for New Funding:

- **CoC Bonus**
 - Funding available: Exact funding allocation available to the Orange County CoC for CoC Bonus projects will be announced when HUD publishes the Estimated ARD Report.
 - New projects created through reallocation or CoC Bonus processes include:
 - ❖ Permanent supportive housing (PSH) projects.
 - ❖ Rapid rehousing (RRH) projects.
 - ❖ Joint Transitional Housing and Rapid Rehousing (Joint TH-RRH) component projects.
 - ❖ Dedicated HMIS project that can only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant and is listed on the HMIS Lead form in the CoC Applicant Profile in e-snaps. Additionally, if the CoC has organizations within its geographic area that are victim service providers, the HMIS Lead, or subrecipient, may request HMIS funds for a comparable database. Victim service providers may also request HMIS funds in their project application budgets to enter data into a comparable database.
 - ❖ Supportive Services Only – Coordinated Entry (SSO-CE) project to develop or operate a centralized or coordinated assessment system.
- **DV Bonus**
 - Funding available: Exact funding allocation available to the Orange County CoC for DV Bonus projects will be announced when HUD publishes the Estimated Annual Renewal Demand Report.

Item 5. Attachment A

- HUD will award a point value to each project application using a combination of the CoC Application score, and responses to the domestic violence bonus specific questions in the CoC Application using the following 100-point scale:
 - Rapid Rehousing and Joint Transitional Housing and Permanent Housing- Rapid Rehousing (Joint THRRH) component projects:
 - ❖ **CoC Score.** Up to 50 points in direct proportion to the score received on the CoC Application.
 - ❖ **CoC Collaboration with Victim Service Providers.** Up to 10 points in direct proportion to the score received in the CoC Application.
 - ❖ **Need for the Project.** Up to 10 points based on the extent the CoC quantifies the need for the project in its portfolio, the extent of need, and how the project will fill that gap.
 - ❖ **Quality of the Project Applicant Experience.** Up to 15 points based on the previous performance of the applicant in serving individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking, and their ability to house survivors and meet safety outcomes.
 - ❖ **Demonstration of inclusion of victim-centered practices.** Up to 8 points based on the quality of the project's plan to address the housing and safety needs of survivors by adopting victim-centered practices (e.g., Housing First, Trauma-Informed Care, Confidentiality) in operating their project. Full points will be awarded to project applicants that can demonstrate they are already adopting victim-centered practices.
 - ❖ **Demonstration of plan to include survivors with lived expertise.** Up to 7 points based on the project's ability to demonstrate its plan to involve survivors in policy and program development throughout the project's operation.
 - ❖ Must follow a Housing First approach.
 - SSO-CE to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of people experiencing homelessness who are experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking (e.g., to implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between the CoC's coordinated entry and the victim service providers coordinated entry system where they are different):
 - ❖ **CoC Score.** Up to 50 points in direct proportion to the score received on the CoC Application.
 - ❖ **CoC Collaboration with Victim Service Providers.** Up to 10 points in direct proportion to the score received in the CoC Application.
 - ❖ **Need for the Project.** Up to 25 points based on the extent to which the CoC demonstrates the need for a coordinated entry system that better meets the needs of individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking, and how the project will fill this need.
 - ❖ **Demonstration of plan to include survivors with lived expertise.** Up to 15 points based on the project's ability to demonstrate its plan to involve

Item 5. Attachment A

survivors in policy and program development throughout the project's operation.

- Each CoC may only submit one SSO-CE project; however, there is no limit on the number of PH-RRH and Joint TH/PH-RRH projects CoCs may submit, provided that each application is for at least \$50,000.
- A project applicant may also apply to expand an existing renewal project, including one that was previously awarded with DV Bonus funding, however, only the new project application for the expansion will be considered for DV Bonus funds through this process.
- DV Bonus funding may be used to expand an existing renewal project that is not dedicated to serving individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking who qualify as homeless under paragraphs (1) or (4) of the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act, so long as the DV Bonus funds for expansion are solely for additional units, beds, or services dedicated to persons eligible to be served with DV Bonus funding.

Opportunities and Flexibilities for Projects:

- Expansion Projects:
 - HUD will allow project applicants to apply for a new expansion project through reallocation, CoC Bonus, and DV Bonus processes to expand existing projects that will increase the number of units, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-CE projects.
 - If the new expansion project will expand an existing eligible CoC Program renewal project, HUD will not fund capital costs (i.e., new constructions, rehabilitation, or acquisition) and will only allow 1-year funding requests.
- Consolidation Project:
 - Applicants intending to use the consolidation process to combine two or more, but no more than 10, eligible renewal projects (including renewing YHDP projects), may do so through the renewal project application, and must ensure:
 - Budget Line Items (BLIs) for the consolidated project application submitted, exactly match the sum of the BLIs for each of the individual projects as they appear on the grant agreement, or the grant agreement as amended;
 - Inclusion of the expiring grant numbers with period of performance and budget period start and end dates for the projects that are consolidating;
 - Current period of performance and budget period end dates must end in CY 2025;
 - Are in good standing with HUD; and
 - The projects have the same recipient and are for the same component.
- Transition Grant:
 - A grant to fund a new CoC project through the reallocation process to transition an eligible renewal project from one program component to another eligible new component over a 1-year period. The renewal project transitioning to a new component must be fully eliminated through reallocation. Transition grants in this Competition may apply to renew in subsequent fiscal year competitions for eligible activities of the new component.
 - The new transition project must meet the following requirements:
 - To be eligible to receive a transition grant, the current recipient must have the consent of its CoC,
 - Transition grants in this Competition are eligible for renewal in subsequent fiscal years for eligible activities of the new component,

Item 5. Attachment A

- The new project application must meet project eligibility and project quality thresholds established by HUD.

E-snaps Application Guidance

- Project applications must be completed by new and renewal project applicants to include the population(s) and subpopulation(s) they will serve, the type of housing and services that will be provided, and the budget activities that are being requested.
 - Returning project applicants: can choose to import the FY 2023 renewal project application responses; however, this must be requested during your registration of the Renewal Funding Opportunity in e-snaps and is only available if you submitted a renewal project application in the FY 2023 CoC Program Competition. For further information, please see FY 2024 CoC Renewal Project Application Detailed Instructions (hud.gov): <https://www.hud.gov/sites/dfiles/CPD/documents/CoC/FY-2024-CoC-RENEWAL-Application-Detailed-Instructions.pdf>.
 - First-time renewal projects: must complete the entire renewal project application, including any first-time renewal projects awarded funds under the FY 2023 CoC Program Noncompetitive Funding Notice. For further information, please see FY 2024 CoC Renewal Project Application Detailed Instructions (hud.gov): <https://www.hud.gov/sites/dfiles/CPD/documents/CoC/FY-2024-CoC-RENEWAL-Application-Detailed-Instructions.pdf>.
 - New project applications: must be completed in full and in accordance with the new project application components permitted in this year's Competition. For further information, please see FY 2024 New Project Application Detailed Instructions (hud.gov): <https://www.hud.gov/sites/dfiles/CPD/documents/CoC/FY-2024-CoC-NEW-Application-Detailed-Instructions-7-31-2024.pdf>