

# Columbus and Franklin County Continuum of Care Governance and Policy Statements

## Continuum of Care Structure under the HEARTH Act

The Continuum of Care (CoC) is composed of representatives of relevant organizations that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and homelessness prevention strategies to address the various needs of persons experiencing homelessness or at risk of experiencing homelessness for a specific geographic area. The CoC is responsible for coordinating and implementing a system for its geographic area to meet the needs of the homeless population and subpopulations within the geographic area.

The CoC's primary responsibilities under the HEARTH Act include the following:

- < Operating the CoC
- < Designating and operating a Homeless Management Information System (HMIS)
- < CoC planning

In Columbus and Franklin County, Ohio, the CoC provides stewardship for all the strategies developed under *A Place to Call Home* and *A Place to Call Home for Youth* (frameworks for action to address homelessness in Columbus and Franklin County). The CoC provides funding for the capital, services, and operations of housing in Columbus and Franklin County, coordinates activities for the frameworks, promotes collaboration to achieve goals and strategies, and secures resources for programs and projects.

The policy statements below govern the work of the CoC. The CoC annually reviews and approves these policies and an annual plan.

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## I. Structure

The CoC membership comports with HUD requirements as listed below. The CoC annually reviews and approves its membership, inclusive of new members. A CoC Board, with representatives from the CoC, meets regularly and is authorized by the CoC to make decisions on its behalf.

A public invitation for new members to join the CoC is issued annually. The CoC Board reviews nominations (including self-nominations) and recommends members for participation on the CoC. A total of 40 members are annually approved for participation. Rotation of members is considered if and when appropriate, using the table below. *24 CFR Part 578.7(a)(2)*

CoC Structure	Organizational Representative
Non-profit homeless providers <i>(rotating consideration)</i>	Community Shelter Board YMCA of Central Ohio
Youth homeless organizations <i>(rotating consideration)</i>	Home for Families
Victim service providers/Advocates <i>(rotating consideration)</i>	Lutheran Social Services CHOICES for Victims of Domestic Violence
Faith-based organizations <i>(rotating consideration)</i>	Community of Caring Foundation
Local Governments/ESG Entitlement	City of Columbus Columbus Mayor's Office Columbus City Council Franklin County
Street Outreach <i>(rotating consideration)</i>	Mount Carmel Health System Street Medicine
Businesses	The Columbus Foundation CSB Board Member CSB Board Member CSB Board Member
Advocates and other homeless subpopulation advocates <i>(rotating consideration)</i>	Columbus Coalition for the Homeless Corporation for Supportive Housing Legal Aid Society of Columbus
Agencies that serve survivors of human trafficking <i>(rotating consideration)</i>	Sanctuary Night
Public Housing Authorities	Columbus Metropolitan Housing Authority
School administrators/Homeless liaisons	Columbus City Schools – Project Connect
Employment Services	Workforce Development Board of Central Ohio
Social Service Providers	Franklin County Children Services Franklin County Dept of Job and Family Services

	Franklin County Office on Aging United Way of Central Ohio
Disability service organizations/Disability advocates	Franklin County Board of Developmental Disabilities
Mental Health and Substance Abuse Service Organizations/Advocates <i>(rotating consideration)</i>	ADAMH Board Twin Valley Behavioral Healthcare
Hospitals <i>(rotating consideration)</i>	OhioHealth
Universities <i>(rotating consideration)</i>	Columbus State Community College
Affordable Housing Developers	Affordable Housing Trust Corporation Ohio Capital Corporation for Housing
Law Enforcement	Columbus Police Department
Local Jails/Courts	Office of the Columbus City Attorney
Veterans Organizations	Veterans Administration Veterans Service Commission
Homeless or formerly homeless persons <i>(rotating consideration for individual representatives)</i>	Citizens Advisory Council (CAC) Citizens Advisory Council (CAC)
Youth Advocates <i>(rotating consideration for individual representatives)</i>	Youth Action Board (YAB)
LGBTQ+-serving Organization/Advocates <i>(rotating consideration)</i>	Equitas Health

The CoC Board is formed with representatives from the CoC. The group meets regularly and is given authority by the CoC to make decisions on its behalf. The CoC Board is the CoC's Executive Committee, comprised of the following organizational representatives:

1. City of Columbus
2. Franklin County
3. Citizens Advisory Council (homeless or formerly homeless representative)
4. ADAMH Board
5. Columbus Metropolitan Housing Authority
6. United Way of Central Ohio
7. The Columbus Foundation
8. Columbus Coalition for the Homeless
9. Affordable Housing Trust Corporation
10. CSB Board Member
11. CSB Executive Director

The Chair of both the CoC and CoC Board is elected from the membership of the CoC Board by a majority of the CoC Board members, taking effect July 1 for the following two fiscal years.

### 1. Membership

For CoC membership, the CoC Board proposes new/replacement member participation each year. The CoC Board receives recommendations for consideration from the CAC, YAB, CSB Board, and the Columbus Coalition for the Homeless for their respective organizations' representation. CSB posts on the CoC website by March 1 of each year that nominations for CoC membership are open and sends an email soliciting nominations to a wide array of community stakeholders. The nomination period remains open until the May CoC Board meeting. The CoC Board considers the nominations at the May meeting. The CoC Board must reach consensus when recommending new/replacement members for the CoC. In this context, consensus means that first a unanimous vote will be attempted. If unanimity cannot be achieved, a positive vote by two-thirds (2/3) of the members (7) is needed for a new/replacement member to be recommended. The CoC votes on the CoC Board recommendations at the May/June CoC meeting. The CoC also must strive for consensus when adding new/replacement members. First, a unanimous vote will be attempted. If unanimity cannot be achieved, a positive vote by two-thirds (2/3) of the members (27) is needed for a new/replacement member to be recommended. The new membership takes effect July 1 for the following fiscal year. *24 CFR Part 578.7(a)(2)*

For CoC Board membership, the CoC Board receives recommendations for consideration from the CAC, CSB Board, and the Columbus Coalition for the Homeless for their respective organizations' representation. These representatives must be members of the CoC. The CoC Board must reach consensus when recommending replacement members for the CoC Board. In this context, consensus means that first a unanimous vote will be attempted. If unanimity cannot be achieved, a positive vote by two-thirds (2/3) of the members (7) is needed for a replacement member to be recommended. The CoC Board membership will not exceed 11. In proposing replacement members, the CoC Board will be mindful that the CoC Board membership must be free of any factual or perceived conflict of interest. The recommendations are made at the May CoC Board meeting. The CoC will vote on the CoC

Board recommendations at the May/June CoC meeting with the new membership taking effect July 1 for the following two fiscal years. *24 CFR Part 578.7(a)(3)*

## 2. Meetings

The CoC is expected to meet at least in January, May/June, and late summer/fall of each year. CoC meetings are open to the public. The CoC Board is expected to meet at least in January, April, May, and late summer/fall of each year, in closed meetings. CSB may, from time to time, request the CoC Board to meet more frequently to meet HUD requirements. Regular attendance in both CoC and CoC Board meetings is expected by the representative or their delegate, as long as the delegate holds decision-making authority. If a delegate is needed for a meeting, the official member must inform CSB as soon as possible ahead of the meeting so that CSB can ensure there are no conflicts of interest. Meetings can occur in person or virtually. *24 CFR Part 578.7(a)(1)*

CSB staff gives notice of each meeting of the CoC and CoC Board, to each member of the CoC and CoC Board, by mailing or emailing the same to each member at least seven (7) days prior to the holding of such meeting and posting the CoC meeting agenda on the CoC's website. CSB provides staff support for the CoC and CoC Board.

A majority of the CoC and the CoC Board members shall constitute a quorum at all meetings thereof. Voting shall only occur if a quorum has been achieved during the meeting. Robert's Rules of Order will be followed and a simple majority vote is necessary for any resolution of the committee to be passed.

## 3. Community Framework Activities

The CoC does not serve as the convener for the Community Frameworks' strategies, but provides stewardship and oversight for the Community Frameworks.

The role of the Strategy Conveners is as follows:

- < Form a planning group
- < Report progress to the CoC
- < May or may not serve as lead implementing agency
- < Suggest resources for implementation
- < Assist the CoC with securing resources

Throughout the implementation of the Community Frameworks, evaluation efforts will assess the degree to which the frameworks are executed and will track the success of each strategy. Our community's HMIS is used as the primary data source and enhances data collection activities related to the Community Frameworks. It is also used as a monitoring, outcomes measurement, and performance-based contracting tool across systems, to inform the community about the progress of the Community Frameworks, and to meet HUD requirements.

## 4. Conflict of Interest and Code of Conduct

Any individual participating in or influencing decision making must identify actual or perceived conflicts of interest as they arise and comply with the letter and spirit of this policy. Disclosure should occur at the earliest possible time and, if possible, prior to the

discussion of any such issue. Individuals with a conflict of interest should abstain from voting on any issue in which they may have a conflict. An individual with a conflict of interest who is also the committee chair shall yield that position during discussion and abstain from voting on the item. No CoC Board or CoC member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents. Annual written disclosure statements will be provided by each member by June 30. Members will not be permitted to participate in meetings until the statement is on file at CSB. *24 CFR Part 578.7(a)(5)*

## 5. Appeals

For CoC- and Emergency Solutions Grant (ESG)-funded programs, if a Partner Agency is not satisfied with a decision made by CSB, the agency can appeal to the CoC Board. If the agency is not satisfied with the CoC Board's decision on the appeal, the agency can appeal to the CoC. The CoC's decision is final. For CSB-funded programs, if a Partner Agency is not satisfied with a decision made by CSB, the agency can appeal to CSB's Board of Trustees.

## II. CoC Responsibilities

### 1. Operations of the CoC

- ⟨ Adopt and follow a written process to select the CoC Board. The process must be reviewed, updated, and approved at least once every 5 years. *24 CFR Part 578.7(a)(3)*
- ⟨ Appoint members to the CoC Board. *24 CFR Part 578.7(a)(3)*
- ⟨ Renew authority of the CoC Board. *24 CFR Part 578.7(a)(3)*
- ⟨ Review and approve annual membership inclusive of new members. *24 CFR Part 578.7(a)(3)*
- ⟨ Review and approve the Annual Plan and the CoC Governance and Policy Statements.
- ⟨ Lead, develop, follow, and update annually a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board. *24 CFR Part 578.7(a)(5)*
- ⟨ Appoint additional committees, subcommittees, or work groups. *24 CFR Part 578.7(a)(4)*
- ⟨ Review, as needed, decisions made by the CoC Board, inclusive of:
  - Population- and program-specific performance targets for subrecipients
  - Partner Agency performance and outcomes of ESG and CoC-funded programs
  - Actions against poor performers *24 CFR Part 578.7(a)(6)*
- ⟨ In consultation with recipients of ESG program funds, establish and operate a coordinated assessment system for individuals and families experiencing homelessness, with specifications for the needs of individuals and families fleeing domestic violence, dating violence, sexual assault, or stalking (delegated to CSB). *24 CFR Part 578.7(a)(8)*
- ⟨ Establish and consistently follow written standards for the provision of ESG and CoC assistance (delegated to CSB). *24 CFR Part 578.7(a)(9)*

## 2. CoC Planning

- ⟨ Receive community and public policy updates relevant to homelessness issues.
- ⟨ Receive updates on the Community Frameworks.
- ⟨ Coordinate the implementation of a Columbus/Franklin County housing and service system that encompasses outreach, engagement, assessment, shelter, housing, supportive services, and homelessness prevention. *24 CFR Part 578.7(c)(1)*
- ⟨ Plan and conduct a sheltered and unsheltered point-in-time count of homeless persons (delegated to CSB). *24 CFR Part 578.7(c)(2)*
- ⟨ Conduct annual gaps analyses of homeless needs and services (delegated to CSB). *24 CFR Part 578.7(c)(3)*
- ⟨ Provide required information to complete the local Consolidated Plan(s) (delegated to CSB). *24 CFR Part 578.7(c)(4)*
- ⟨ Review and act on the annual funding allocations, inclusive of ESG and CoC funds, and establish funding priorities. *24 CFR Part 578.7(c)(5)*
- ⟨ Design, operate, and follow a collaborative process for the development of applications (delegated to CSB). *24 CFR Part 578.9(a)(1)*
- ⟨ Review, act on, and approve the HUD CoC Application, including all relevant charts and tables. *24 CFR Part 578.9(a)(1) and 578.9(b)*
- ⟨ Review and act on any programs that should be removed from HUD funding and subsequent funding reallocations.
- ⟨ Review and make final determination on Partner Agency appeals, if a Partner Agency is not in agreement with the CoC Board determination.
- ⟨ Establish priorities for funding projects. Review and act annually on new and renewal project(s) for prioritization for the CoC Application. *24 CFR Part 578.9(a)(2)*
- ⟨ Receive a presentation from any new project developer about its proposal(s).
- ⟨ Make a final determination on project priorities for the annual Ohio Housing Finance Agency tax credit application.
- ⟨ Designate a Collaborative Applicant and select it to apply to HUD to be designated as the UFA for the Continuum.
- ⟨ Review and act on any other CoC Board recommendations, as needed.

## 3. HMIS Operations (delegated to the CoC Board)

- ⟨ Designate a single HMIS for the CoC. *24 CFR Part 578.7(b)(1)*
- ⟨ Designate an HMIS Lead. *24 CFR Part 578.7(b)(2)*
- ⟨ Ensure consistent participation of subrecipients in HMIS (delegated to CSB). *24 CFR Part 578.7(b)(4)*
- ⟨ Ensure the HMIS compliance with HUD requirements (delegated to CSB). *24 CFR Part 578.7(b)(5)*
- ⟨ Review and approve the HMIS policies and procedures, privacy plan, security plan and data quality plan. *24 CFR Part 578.7(b)(3)*

## 4. A Place to Call Home for Youth

- ⟨ Oversee implementation of A Place to Call Home for Youth (the local Plan to Prevent and End Youth Homelessness) and ensure appropriate and sufficient funding for plan implementation.

- ⟨ Oversee implementation of the programs under HUD's Youth Homelessness Demonstration Project (YHDP) grant.
- ⟨ Operate the Committee to Address Youth Experiencing Homelessness as a standing committee under the CoC.
- ⟨ Operate the Youth Action Board as a standing committee under the CoC.
- ⟨ Monitor the progress of efforts to prevent and end youth homelessness and the performance of programs implemented under A Place to Call Home for Youth.

### III. CoC Board Responsibilities

#### 1. Operations of the CoC Board

- ⟨ Review and recommend annual membership to the CoC. *24 CFR Part 578.7(a)(2)*
- ⟨ Review and recommend membership to the CoC Board. *24 CFR Part 578.7(a)(3)*
- ⟨ Select the CoC and CoC Board Chair bi-annually. *24 CFR Part 578.7(a)(3)*
- ⟨ Review and recommend to the CoC the Annual Plan and the CoC Governance and Policy Statements. *24 CFR Part 578.7(a)(5)*

#### 2. CoC Planning

- ⟨ Receive community and public policy updates relevant to homelessness issues.
- ⟨ Receive updates on the Community Framework and take actions that will move the framework forward.
- ⟨ Provide required information to complete the local Consolidated Plan(s) (delegated to CSB). *24 CFR Part 578.7(c)(4)*
- ⟨ Review and recommend CoC action on annual funding allocations, inclusive of ESG and CoC funds, and establish funding priorities. *24 CFR Part 578.7(c)(5)*
- ⟨ Review and recommend CoC action on the HUD CoC Application, including all relevant charts and tables. *24 CFR Part 578.9(a)(1)*
- ⟨ Review and act on Partner Agency appeals as necessary.
- ⟨ Review and act on the annual Point in Time Count. *24 CFR Part 578.7(2)*
- ⟨ Review and act on the annual Housing Inventory Chart and Gap Analyses. *24 CFR Part 578.7(2) and 24 CFR Part 578.7(3)*
- ⟨ Review and act on any other HUD-mandated activity.

#### 3. Performance Monitoring

- ⟨ Review the performance and evaluate outcomes of existing CoC- and ESG-funded projects, taking into account HUD System Performance Measures, and recommend actions to the CoC, including consideration for and inclusion in the consolidated HUD CoC application. *24 CFR Part 578.7(a)(7)*
- ⟨ Review and recommend to the CoC any programs that should be removed from HUD funding and any subsequent funding reallocations.
- ⟨ Recommend to the CoC actions against poor performers. *24 CFR Part 578.7(a)(6)*
- ⟨ Review ongoing projects that have participated in Quality Improvement Intervention (QII) at the request of the Partner Agency and/or CSB.



- ⟨ In consultation with recipients of ESG program funds and sub-recipients, review and approve annual performance standards and evaluation of outcomes for programs funded under the ESG and CoC programs. *24 CFR Part 578.7(a)(9)*

#### 4. New Programs

- ⟨ Review and incorporate feedback from Partner Agencies on new projects and any other relevant topics.
- ⟨ Review and incorporate feedback from the CAC on new projects and any other relevant topics.
- ⟨ Receive a presentation from any new project developer about its proposal(s) for prioritization for the HUD CoC Application.
- ⟨ Review proposed new project(s) and make recommendations to the CoC for consideration, action, inclusion, and prioritization in the consolidated HUD CoC application. *24 CFR Part 578.9(a)(2)*
- ⟨ Review and recommend to the CoC the permanent supportive housing priority for consideration by the Ohio Housing Finance Agency.

#### 5. HMIS Operations

- ⟨ Designate a single HMIS for the CoC *24 CFR Part 578.7(b)(1)*
- ⟨ Designate an HMIS Lead *24 CFR Part 578.7(b)(2)*
- ⟨ Ensure consistent participation of subrecipients in HMIS (delegated to CSB) *24 CFR Part 578.7(b)(4)*
- ⟨ Monitor that all recipients of financial assistance under the CoC and ESG programs are using the HMIS to collect client-level data on persons served (delegated to CSB) *24 CFR Part 578.7(b)(4)*
- ⟨ Ensure HMIS compliance with HUD requirements (delegated to CSB) *24 CFR Part 578.7(b)(5)*
- ⟨ Review and approve the HMIS policies and procedures, privacy plan, security plan, and data quality plan for the operation and administration of the local HMIS *24 CFR Part 578.7(b)(3)*

#### 6. A Place to Call Home for Youth

- ⟨ Make recommendations to the CoC on implementation of A Place to Call Home for Youth (the local Plan to Prevent and End Youth Homelessness and ensure appropriate and sufficient funding for plan implementation).
- ⟨ Oversee implementation of the programs under HUD's Youth Homelessness Demonstration Project (YHDP) grant.
- ⟨ Monitor the progress of efforts to prevent and end youth homelessness and the performance of programs implemented under A Place to Call Home for Youth.

## IV. Community Shelter Board Responsibilities

CSB is the primary organization supporting all of the groups involved with moving the Community Frameworks forward. In addition to its roles as a convener of some of the Community Frameworks' strategies, CSB is responsible for the following, per CoC delegation.

### 1. Operations of the CoC

- ⟨ Serve as the CoC fiscal agent.
- ⟨ Provide staffing support to the CoC and CoC Board.
- ⟨ Issue annually a public request for new CoC member nominations. *24 CFR Part 578.7(a)(2)*
- ⟨ Act as the Collaborative Applicant for the Columbus and Franklin County CoC, per the HEARTH legislation. *24 CFR Part 578.9(a)(3)*
- ⟨ Act as the Collaborative Applicant for the HUD Youth Homelessness Demonstration Program.
- ⟨ Act as the Unified Funding Agency for the Columbus and Franklin County CoC, per the HEARTH legislation.
- ⟨ Act as the HMIS Lead for the Columbus and Franklin County CoC, per the HEARTH legislation. *24 CFR Part 578.7(b)(2)*
- ⟨ Act as the subrecipient of ESG funds for the Columbus and Franklin County CoC.

### 2. CoC Planning

- ⟨ Implement the requirements of the HEARTH legislation as mandated by HUD.
- ⟨ Guided by the CoC, implement a housing and service system that meets the needs of persons experiencing homelessness that includes outreach, engagement, and assessment; emergency shelter, housing, and supportive services; and homelessness prevention. *24 CFR Part 578.7(c)(1)*
- ⟨ Prepare and present to the CoC Board and CoC annual funding allocations, inclusive of ESG, CoC, and YHDP funds and annual updates on funding allocations.
- ⟨ Provide program and system level performance monitoring and evaluations of outcomes appropriate for population and program type. *24 CFR Part 578.7(a)(7)*
- ⟨ Report on and evaluate the performance of ESG program recipients and subrecipients. *24 CFR Part 578.7(c)(5)*
- ⟨ Establish and operate a coordinated assessment system for homeless individuals and families. *24 CFR Part 578.7(a)(8)*
- ⟨ Consult with sub-recipients to propose performance targets appropriate for population and program type. *24 CFR Part 578.7(a)(6)*
- ⟨ Establish and consistently follow written standards for the provision of ESG, CoC, and YHDP assistance, including policies and procedures for evaluating individuals' and families' eligibility for assistance; policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance, rapid re-housing assistance, and permanent supportive housing assistance; policies and procedures for emergency transfers that comply with VAWA requirements under 578.99(j)(8); and standards for determining what percentage or amount of rent each program participant must pay while receiving rapid re-housing assistance. *24 CFR Part 578.7(a)(9) and 24 CFR Part 578.7(d)*

- ⟨ Communicate Community Framework progress to the community.
- ⟨ Meet HUD record keeping requirements, inclusive of CoC and ESG records.
- ⟨ Plan and conduct a sheltered and unsheltered point-in-time count of homeless persons. *24 CFR Part 578.7(c)(2)*
- ⟨ Plan and conduct an annual Housing Inventory Count and Gap Analyses. *24 CFR Part 578.7(c)(3)*
- ⟨ Provide required information to complete the local Consolidated Plan(s). *24 CFR Part 578.7(c)(4)*
- ⟨ Certify the applicants and projects for Ohio Development Services Agency grants.

### 3. HMIS Operations

- ⟨ Ensure consistent subrecipient participation in HMIS. *24 CFR Part 578.7(b)(4)*
- ⟨ Ensure HMIS compliance with HUD requirements. *24 CFR Part 578.7(b)(5)*
- ⟨ Prepare the HMIS policies and procedures, privacy plan, security plan and data quality plan. *24 CFR Part 578.7(b)(3)*
- ⟨ Prepare annually System Performance Measures, Annual Performance Reports, Longitudinal Systems Analysis, and Analysis of National and Local Homelessness Data. *24 CFR Part 578.7(a)(7)*
- ⟨ Operate as the HMIS Lead and make system-wide decisions regarding the HMIS that impact all covered homeless organizations. HMIS Lead means the entity designated by the CoC Board to operate the Continuum's HMIS on the CoC's behalf. *24 CFR Part 578.7(b)(2)*

### 4. Point in Time Count Plan

Consistent with HUD requirements, an annual Point-in-Time Count is conducted. Participation in the Homeless Count Work Group is open to all interested. The CoC Board reviews and approves the Point-in-Time Count Plan annually and empowers CSB to lead coordination efforts to conduct the count.

### 5. HUD Application Process

The CoC meets annually to review and act on the HUD CoC Application, including all relevant charts and tables. CSB coordinates the submission of CoC project applications, prepares the CoC Application for CoC review, and submits the consolidated Application on behalf of the CoC. CSB coordinates the submission of YHDP project applications, prepares the YHDP application, and submits the application(s) on behalf of the CoC. *24 CFR Part 578.9(a)(1) and 578.9(a)(3)*

### 6. Ohio Department of Development (ODOD) Application Processes

To fulfill the ODOD Homeless Assistance programs application processes, CSB certifies applicants/projects on behalf of the CoC Board and makes recommendations to ODOD. Agencies that disagree with CSB can appeal to the CoC Board via an electronic appeal.

### 7. Letters of Support or Certification

Programs and services which meet the needs of families and individuals experiencing homelessness in Franklin County, Ohio are eligible to request letters of support or certification from the CoC Board and CSB. The CoC Board will only provide letters of support or certification to agencies which have a record of providing quality services to persons who

are experiencing homelessness or at risk of experiencing homelessness, and for projects that are consistent with the local priorities established by the CoC. New agencies must demonstrate the ability to provide high quality services. Projects may receive letters of support or certification if they:

- ⟨ Document the need for the program;
- ⟨ Provide a clearly defined program with attainable outcomes;
- ⟨ Demonstrate collaboration with other community-based organizations;
- ⟨ Demonstrate the provision of high-quality services; and
- ⟨ Deliver services in a highly cost-effective manner.

## 8. Program Performance Standards

Program performance standards are established by CSB and recommended to the CoC Board for approval annually and incorporate HUD requirements and local standards. CSB consults with recipients and sub-recipients to establish performance targets appropriate for population and program type and incorporates these standards into annual program agreements with each Partner Agency (sub-recipient). An annual Program Outcome Plan (POP) is part of the agreement. If CSB and the agency disagree on the annual POP, the agency may appeal to the CoC Board (if CoC- or ESG-funded) or CSB Board Chair (if CSB-funded). CSB monitors program performance, evaluates outcomes, and provides monthly, quarterly, semi-annual, and annual data reports that are widely disseminated to Partner Agencies, funders, and stakeholders. Performance data and outcome reports are submitted to HUD, as required. *24 CFR Part 578.7(a)(6) and 578.7(a)(7)*

## 9. Quality Improvement Plans

CSB addresses programs of ongoing concern through a Quality Improvement (QI) Plan process. The QI Plan process is based on one-on-one dialogues between CSB and the Partner Agency and considers agency plans and progress on addressing program issues. CSB and the Partner Agency enter into a QI Plan if a program experiences long-standing and/or serious program issues and/or systemic agency concerns. If the agency and/or CSB find that the QI Plan process is not working, either may refer the concerns/issues to the CoC Board. The Partner Agency will be given an opportunity to present its case to the CoC Board, at the CoC Board's request. If the partner agency is not in agreement with the CoC Board's decision, the partner agency can appeal to the CoC. The CoC will review the CoC Board's decision and make the final determination on partner agency appeals.

## 10. Performance Ratings

Through its evaluative work, CSB annually establishes performance ratings of each CoC- and ESG-funded and CSB-funded program. Based on these ratings, CSB recommends to the CoC Board programs that should not continue to receive funding through the annual HUD application process because of underperformance. All programs rated as "Low" performers through CSB's annual Program Evaluation are discussed by the CoC Board. CSB recommends to the CoC Board funding reallocations based on program performance and need. The CoC is the final decision maker regarding any programs that should be removed from HUD funding and any subsequent funding reallocations. *24 CFR Part 578.7(a)(7)*

## 11. Meeting Support

CSB provides meeting support for the CoC and CoC Board and all other committee meetings. by scheduling meetings, developing agendas, issuing meeting materials and posting all relevant documents to [www.columbusfranklincountycoc.org](http://www.columbusfranklincountycoc.org).

- ⟨ CoC and CoC Board members may suggest agenda items.
- ⟨ Agenda and meeting materials are released one week prior to meetings.
- ⟨ The agenda is reviewed and adopted at the start of the meeting; changes may be offered for consideration.
- ⟨ Meeting notes are produced within 30 days of the meeting and approved at the following meeting.
- ⟨ Materials are posted on the website for all CoC and CoC Board members.

## 12. Costs

Every effort is made to keep process costs to the minimum necessary to achieve full funding. CSB works to raise funds to support the processes of the CoC, including central administrative requirements related to HMIS and the Point-in-Time Count.

## V. HMIS (CSP) Lead Roles and Activities

CSB, as the CoC-designated HMIS Lead, maintains the community's HMIS – Community Services Portal – in compliance with HUD's 2017 HMIS data standards and coordinates all related activities including training, maintenance, and technical assistance to agencies. Each participating agency or Contributing HMIS Organization (CHO) is expected to participate in the CSP Administrators Group which oversees CSP operations. Annually, CSB conducts an anonymous Administrator/User survey.

CSB has the following roles:

1. Make decisions about HMIS management and administration.
2. Designate a single information system as the official HMIS software for the geographic area.
3. Develop an HMIS governance charter and document all assignments and designations consistent with the governance charter. The charter is to contain, at the minimum:
  - ⟨ A requirement that the HMIS Lead enter into written HMIS Participation Agreements with each Contributing Homeless Organization (CHO) requiring the CHO to comply with this part and imposing sanctions for failure to comply;
  - ⟨ The participation fee charged by the HMIS; and
  - ⟨ Such additional requirements as may be issued by notice from time to time.
4. Ensure that recipients of CoC, ESG, YHDP funds and funds from the other programs authorized by Title IV of the McKinney-Vento Act participate in the HMIS. CSB duties include establishing the HMIS; conducting oversight of the HMIS; taking corrective action, if needed, to ensure that the HMIS is compliant with all HUD requirements; ensuring that all recipients of financial assistance under the CoC and ESG programs use the HMIS to collect client-level data on persons served.

5. Develop written HMIS policies and procedures for all CHOs for the operation of the HMIS.
6. Execute a written HMIS Participation Agreement with each CHO, which includes the obligations and authority of the HMIS Lead and CHO, the requirements of the security plan with which the CHO must abide, the requirements of the privacy policy with which the CHO must abide, the sanctions for violating the HMIS Participation Agreement (e.g. imposing a financial penalty, requiring completion of standardized or specialized training, suspending or revoking user licenses, suspending or revoking system privileges, or pursuing criminal prosecution), and an agreement that the HMIS Lead and the CHO will process Protected Identifying Information consistent with the agreement. The HMIS Participation Agreement may address other activities to meet local needs.
7. Serve as the applicant to HUD for grant funds to be used for HMIS activities for the CoC's geographic area, as directed by the CoC, and, if selected for an award by HUD, enter into a grant agreement with HUD to carry out the HUD-approved activities.
8. Monitor and enforce compliance by all CHOs with the requirements of this part and report on compliance to CoC Board and HUD.
9. Submit a security plan, a data quality plan, and a privacy policy to the CoC Board annually for approval. Review and update the plans and policy at least annually. During this process, seek and incorporate feedback from the CoC Board and CHO. Implement the plans and policy immediately after approval by the CoC Board.
10. At a minimum, the privacy policy includes data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description; access and correction standards; accountability standards; protections for victims of domestic violence, dating violence, sexual assault, and stalking; and such additional information and standards as may be established by HUD in notice.
11. The security plan meets the minimum requirements for a security plan as established by HUD in notice.
12. Designate one staff member as the HMIS security officer to be responsible for ensuring compliance with applicable security standards.
13. Ensure that each CHO designates a security officer and conducts workforce security measures.
14. Conduct workforce security screening; ensure that each CHO conducts criminal background checks on the HMIS security officer and on all administrative users. Unless otherwise required by HUD, background checks may be conducted only once for administrative users.

15. Report security incidents. Implement a policy and chain of communication for reporting and responding to security incidents, including a HUD-determined predefined threshold when reporting is mandatory, as established by HUD in notice.
16. Develop and establish a disaster recovery plan, which includes at a minimum, protocols for communication with staff, the CoC Board, and CHOs and other requirements established by HUD in notice.
17. Conduct an annual security review to ensure the implementation of the security requirements for itself and CHOs. This security review includes completion of a security checklist ensuring that each of the security standards is implemented in accordance with the HMIS security plan.
18. Ensure that each user completes security training at least annually and prior to being given access to the HMIS.
19. Ensure that each CHO conducts an annual security review.
20. Set data quality benchmarks including bed coverage rates and service-volume coverage rates.
21. Archive data in the HMIS and follow standards published in the Federal Register notices.
22. At least annually or upon request from HUD, submit an unduplicated count of clients served and an analysis of unduplicated counts.
23. Submit reports to HUD as required.

## VI. Partner Agency Activities

### 1. Partner Agency Input

The CoC values input and participation by Partner Agencies in all processes, including:

- ⟨ Designated seats on all committees.
- ⟨ The opportunity to review and comment on new projects prior to CoC Board review.
- ⟨ The opportunity to review and comment on CoC annual plan, policies, and program standards.

### 2. Partner Agency Program Requirements and Rights

Partner Agencies are the cornerstone of success for the implementation of the Community Frameworks. A collaborative, streamlined system with clear goals and objectives will result in continued success for Partner Agencies. Partner Agency roles include the following:

- ⟨ Continue to develop and implement high-quality programs and services.
- ⟨ Work with conveners, collaborators, and funders to build support for programs.
- ⟨ Share and implement best practices and collaborate with other Partner Agencies.
- ⟨ Work with funders to evaluate programs and engage in quality improvement activities.
- ⟨ Participate in advocacy efforts.

The CoC expects that Partner Agencies will meet requirements to receive CoC and ESG funding and intends to treat all Partner Agencies fairly in evaluating performance. These requirements include:

- ⟨ Meet relevant program and HUD standards and achieve program outcome goals.
- ⟨ Submit an annual program outcome plan in line with HUD and CoC requirements and update program descriptions through the annual CSB Gateway process.
- ⟨ Submit CoC project application per HUD timeline.
- ⟨ Submit required data through the HMIS.
- ⟨ Submit HUD APR data to CSB, as needed.

The CoC also establishes certain rights of Partner Agencies, including the rights to:

- ⟨ Participate in QI Plans prior to HUD funds being reduced or eliminated by the CoC.
- ⟨ Appeal to the CoC if it disagrees with a recommendation by the CoC Board.
- ⟨ Request a waiver from compliance with specific program performance standards.
- ⟨ Submit Concept Papers and Project Plans for new projects, for the consideration of the CoC Board and the CoC, in accordance with the standards for development of new projects found at [www.csb.org](http://www.csb.org).



## VII. Citizens Advisory Council and Youth Action Board Activities

The CoC values input and participation by persons who are experiencing or have experienced homelessness. The Citizens Advisory Council will have the following opportunities:

- < Two seats on the CoC and one seat on the CoC Board;
- < The opportunity for designated seats on all committees;
- < The opportunity to review and comment on new projects prior to CoC Board review;
- < The opportunity to review and comment on CoC annual plan, policies, and program standards; and
- < The opportunity to review and comment on the Community Frameworks and other system strategy materials.

The Youth Action Board will have the following opportunities:

- < One seat on the CoC;
- < The opportunity for designated seats on all committees, particularly committees addressing youth homelessness;
- < The opportunity to review and comment on new projects prior to CoC Board review; particularly projects addressing youth homelessness;
- < The opportunity to review and comment on CoC annual plan, policies, and program standards; and
- < The opportunity to review and comment on the Community Frameworks and other system strategy materials.

## VIII. Committees, Subcommittees, and Workgroups

The following committees are currently operational. These committees are also staffed by CSB representatives.

### 1. Adult System Operations Workgroup (ASOW)

A Partner Agency group comprised of representatives of non-profit agencies operating emergency shelters for single adults, the coordinated point of access to emergency shelter, rapid re-housing providers, and outreach providers. The group meets at least monthly (more often during the winter overflow season) to further the provision of services for single adults experiencing homelessness.

### 2. Family System Operations Workgroup (FSOW)

A Partner Agency group comprised of representatives of non-profit agencies operating emergency shelters for families, the local domestic violence agency, the coordinated point of access to emergency shelter, rapid re-housing providers, and homelessness prevention providers. The group meets at least monthly to further the provision of services for families and pregnant women experiencing homelessness.

### 3. Permanent Supportive Housing Roundtable

A Partner Agency group comprised of representatives of non-profit agencies operating permanent supportive housing programs in the community, the local mental health and substance abuse board, and the local public housing authority. The group meets quarterly to improve the provision of permanent supportive housing system and services for formerly homeless single adults and families.

### 4. HMIS Administrators Group

A Partner Agency group comprised of representatives of non-profit agencies using the local homeless management information system, HMIS. Each agency that has access to HMIS must have designated two administrators. Both are invited to participate at quarterly meetings where new HMIS developments are discussed and improvements to the system are proposed and implemented.

### 5. Citizens Advisory Council (CAC)

The Citizens Advisory Council is a CSB-sponsored group with membership comprised of homeless and formerly homeless individuals. This group meets monthly. The CoC values input and participation by the CAC in all processes.

### 6. Point-in-Time Count Workgroup

A group comprised of representatives of non-profit agencies operating emergency shelters, the coordinated point of access to emergency shelter, outreach, rapid re-housing, local homeless advocacy groups, and other social service agencies. The group meets starting in the fall of each year and until the annual Point-in-Time count occurs and all the counting is finalized. The purpose of the group is to plan and implement the annual Point in-Time count of unsheltered homeless individuals.

## 7. Committee to Address Youth Experiencing Homelessness

A group that oversees implementation of the local plan to prevent and end youth homelessness and coordinates development and submission of project applications for the HUD YHDP. The Committee includes nonprofit organizations that serve youth experiencing homelessness, Franklin County Children Services, the Local Education Agency, City and County governments, recipient(s) of federal Runaway and Homeless Youth funding, the Youth Action Board, and CSB.

## 8. Youth Action Board (YAB)

The YAB is comprised of at least three youth members (age 24 and younger), at least two-thirds of whom are homeless or formerly homeless. The YAB plans and participates in the implementation of the local plan to prevent and end youth homelessness. The YAB reviews and approves all project applications submitted under the YHDP grant and provides feedback to the Committee to Address Youth Experiencing Homelessness. YAB is an active member of the Committee to Address Youth Experiencing Homelessness and the CoC. YAB provides feedback to the Committee and the CoC on programs implemented through the YHDP and the local plan to prevent and end youth homelessness.

## 9. Veteran System Operations Workgroup

A group that oversees implementation of the local policies and procedures to end veteran homelessness. The group includes the U.S. Department of Veterans Affairs, Veterans Service Commission, Supportive Services for Veteran Families providers, and other entities that serve veterans experiencing homelessness. The group meets weekly to further the provision of services for veterans.

## 10. Homelessness Prevention Network Partner Operations Workgroup (HPN POW)

A group comprised of representatives of HPN partner agencies who deliver prevention services. The group meets bi-weekly in a learning exchange format to further the provision of services for families at risk of experiencing homelessness.

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