

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 the group 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 prevention strategies to address the various needs of homeless or at risk of homelessness persons for a specific geographic area. The Continuum 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 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 (formerly the Rebuilding Lives Funder Collaborative) provides stewardship for all the strategies developed under *A Place to Call Home: A Framework for Action to Address Homelessness in Columbus and Franklin County* (formerly the Rebuilding Lives Plan) and provides funding for the capital, services, and operations of supportive housing in Columbus and Franklin County, coordinates activities for the new framework, 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 policies are organized into different areas. The CoC annually reviews and approves the annual plan and policies.

- I. Structure
- II. CoC Responsibilities
- III. CoC Board Responsibilities
- IV. Community Shelter Board (CSB) Activities
- V. HMIS Activities
- VI. Partner Agency and Citizens Advisory Council Activities

I. Structure

1. 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 total of 39 members are annually approved for participation. The CoC Board recommends annually members for participation on the CoC and rotation of members is considered if and

when appropriate, using the table below. Regular attendance is expected by the CoC 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.

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.

CoC Structure	Organizational Representative
Non-profit homeless providers <i>(rotating consideration)</i>	Community Shelter Board Community Housing Network
Youth homeless organizations <i>(rotating consideration)</i>	Huckleberry House
Victim service providers <i>(rotating consideration)</i>	The Center for Family Safety and Healing
Faith-based organizations <i>(rotating consideration)</i>	Church and Community Development for All People
Governments	City of Columbus Columbus Mayor's Office Columbus City Council Franklin County
Street Outreach <i>(rotating consideration)</i>	Capital Crossroads and Discovery SID
Businesses <i>(rotating consideration)</i>	The Columbus Foundation CSB Board Member CSB Board Member CSB Board Member
Advocates and other homeless subpopulation advocates	Columbus Coalition for the Homeless Corporation for Supportive Housing Legal Aid Society of Columbus Youth Action Board
Agencies that serve survivors of human trafficking <i>(rotating consideration)</i>	Freedom a la Cart
Public Housing Authorities	Columbus Metropolitan Housing Authority
School administrators/Homeless liaisons	Columbus City Schools – Project Connect
Employment services <i>(rotating consideration)</i>	Workforce Development Board of Central Ohio
Social Service Providers <i>(rotating consideration)</i>	Franklin County Children Services and Committee to Address Youth Experiencing Homelessness Franklin County Dept of Job and Family Services Franklin County Office on Aging

	Franklin County Board of Developmental Disabilities United Way of Central Ohio
Mental Health and Substance Abuse Service Organizations	ADAMH Board Twin Valley Behavioral Healthcare
Hospitals (rotating consideration)	OhioHealth
Universities (rotating consideration)	Columbus State Community College
Affordable Housing Developers	Affordable Housing Trust Corporation Ohio Capital Corporation for Housing
Law Enforcement	Columbus Police Department
Local Jail	Franklin County Jail
Veterans Organizations	Veterans Administration Veterans Service Commission
Homeless or formerly homeless persons (rotating consideration)	Citizens Advisory Council (CAC) Citizens Advisory Council (CAC)

2. The CoC is expected to meet in January, May/June, August, and November of each year, in open meetings.

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

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.)
- < Appoint members to the CoC Board at least every two years
- < Renew authority of the CoC Board
- < Review and approve annual membership inclusive of new members
- < Review and approve the Annual Plan and the CoC Governance and Policy Statements
- < Appoint additional committees, subcommittees, or work groups
- < Review, as needed, decisions made by the CoC Board, inclusive of:
 - o Performance targets
 - o Partner Agency performance and outcomes of ESG and CoC-funded programs
 - o Actions against poor performers
- < Establish and operate a coordinated assessment system for homeless individuals and families (delegated to CSB)
- < Establish and consistently follow written standards for the provision of ESG and CoC assistance (delegated to CSB)

2. CoC Planning

- < Receive community and public policy updates relevant to homelessness issues
- < Receive updates on the Community Framework
- < Plan and conduct a sheltered and unsheltered point-in-time count of homeless persons (delegated to CSB)
- < Conduct an annual gaps analyses of the homeless needs and services (delegated to CSB)
- < Provide required information to complete the local Consolidated Plan(s) (delegated to CSB)
- < Review and act on the annual funding allocations, inclusive of ESG and CoC funds, and establish funding priorities
- < Review and act on the HUD CoC Application, including all relevant charts and tables
- < 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
- < Review and act annually on proposed new supportive housing bonus project(s) for prioritization for the CoC Application
- < 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
- < 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
- < Designate an HMIS Lead
- < Ensure consistent participation in HMIS (delegated to CSB)
- < Ensure the HMIS compliance with HUD requirements (delegated to CSB)
- < Review and approve the HMIS policies and procedures, privacy plan, security plan and data quality plan

4. Plan to Prevent and End Youth Homelessness

- < Oversee implementation of 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, if awarded
- < 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 the Plan to Prevent and End Youth Homelessness

5. Decision Making

A majority of the CoC members shall constitute a quorum at all meetings thereof. The meeting is adjourned if no quorum is present and no voting shall occur in such case.

Robert's Rules of Order will be followed and a simple majority voting is necessary for any resolution of the committee to be passed.

III. CoC Board Responsibilities

1. 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 representatives:

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

2. Regular attendance is expected by the CoC Board 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 assure there are no conflicts of interest.

The CoC Board is expected to meet in January, April, May, August, and November of each year. CSB may, from time to time, request the CoC Board to meet more frequently to meet HUD requirements.

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

3. Operations of the CoC

- < Review and recommend annual membership to the CoC
- < Review and recommend bi-annually membership to the CoC Board
- < Select the CoC and CoC Board Chair bi-annually
- < Review and recommend to the CoC the Annual Plan and the CoC Governance and Policy Statements

4. 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 feedback and information, as needed, to the local government (City/County) on their Consolidated Plan
- < Review and recommend CoC action on the annual funding allocations, inclusive of ESG and CoC funds, and establish funding priorities
- < Review and recommend CoC action on the HUD CoC Application, including all relevant charts and tables
- < Review and act on Partner Agency appeals as necessary
- < Review and act on the annual Point in Time Count
- < Review and act on the annual Housing Inventory Chart and Gap Analyses
- < Review and act on any other HUD-mandated activity

5. Performance Monitoring

- < Review existing projects and programs and recommend actions to the CoC
- < 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
- < Review existing projects and make recommendations to the CoC for its consideration, action, and inclusion in the consolidated HUD CoC application
- < Review ongoing projects that have participated in QII at the request of the Partner Agency and/or CSB
- < Review and approve annual performance standards and evaluation of outcomes for programs funded under the ESG and CoC programs

6. 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 CoC Application
- < Make recommendations to the CoC for its consideration, action, and inclusion in the consolidated HUD CoC application of proposed new supportive housing bonus project(s)
- < Review and recommend to the CoC the permanent supportive housing priority for consideration by the Ohio Housing Finance Agency

7. HMIS Operations

- < Designate a single HMIS for the CoC
- < Designate an HMIS Lead
- < Ensure consistent participation in HMIS (delegated to CSB).

- < 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.
- < Ensure the HMIS compliance with HUD requirements (delegated to CSB)
- < 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

8. Plan to Prevent and End Youth Homelessness

- < Make recommendations to the CoC on implementation of 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, if awarded
- < Monitor the progress of efforts to prevent and end youth homelessness and the performance of programs implemented under the Plan to Prevent and End Youth Homelessness

9. If the Partner Agency is not satisfied with a decision made by CSB (for CSB-funded Partner Agencies) or the CoC Board (for HUD pass-through-funded Partner Agencies), the Partner Agency may appeal this decision to CSB's Board of Trustees (for CSB-funded Partner Agencies) or the CoC (for HUD pass-through-funded Partner Agencies).

10. Decision Making

Quorum: A majority of the CoC Board members shall constitute a quorum at all meetings thereof. The meeting is adjourned if no quorum is present and no voting shall occur in such case.

Robert's Rules of Order will be followed and a simple majority voting is necessary for any resolution of the committee to be passed. Voting by proxy is allowed only in circumstances wherein subrecipients of HUD funding request budget amendments. A majority of the CoC Board members shall constitute a quorum for a vote by proxy. Voting by proxy may be completed via mail, facsimile, or electronic mail, and the complete record of each vote by proxy shall be collected and maintained by CSB. In order for a budget amendment vote by proxy to be finalized, a majority of all CoC Board members must represent the leading vote.

No CoC Board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.

11. Conflict of Interest

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. Annual written disclosure statements will be provided by each committee

member by June 30. Members will not be permitted to participate until the statement is on file at CSB.

12. New member elections

For the CoC membership, the CoC Board proposes new member participation each year, using the membership composition described in section I. The CoC Board receives recommendations for consideration from the CAC, CSB Board, and the Columbus Coalition for the Homeless for their respective organizations' representation. CSB posts on the CSB website by March 1 of each year that nominations for CoC membership are open. The nomination period remains open until the CoC Board meeting in May. The CoC Board considers the nominations and recommendations at the May meeting. The CoC Board has to reach consensus when recommending new 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 member to be recommended. The CoC votes on the CoC Board recommendations at its May/June meeting. These meetings are open to the public. The new membership takes effect July 1 for the following fiscal year.

For the CoC Board membership, the CoC Board proposes new member participation every other year. 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 has to reach consensus when recommending new 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 new member to be recommended. The CoC Board membership will not exceed 11. A minimum of 2 and a maximum of 5 new members are recommended every two years. In proposing new 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 its May/June meeting with the new membership taking effect July 1 for the following two fiscal years.

13. Community Framework Activities

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

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 Framework, evaluation efforts will assess the degree to which the framework is executed and will track the success of each strategy.

Columbus ServicePoint (CSP), our community's Homeless Management Information System (HMIS), is used as the primary data source. CSP is used for enhancing data collection activities related to the Community Framework. It is also used as a monitoring, outcomes measurement, and performance-based contracting tool across systems and to inform the community about the progress of the Community Framework and meet HUD requirements.

IV. Community Shelter Board Activities

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

1. Operations of the CoC

- < Serve as the CoC fiscal agent
- < Staff the CoC and CoC Board and provide support
- < Issue annually a public request for new CoC member nominations
- < Act as the Collaborative Applicant for the Columbus and Franklin County CoC, per HUD's HEARTH legislation
- < 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 HUD's HEARTH legislation
- < Act as the HMIS Lead for the Columbus and Franklin County CoC, per HUD's HEARTH legislation
- < Act as the subrecipient of the Emergency Solutions Grant (ESG) funds for the Columbus and Franklin County CoC

2. CoC Planning

- < Implement the requirements of the HEARTH legislation as mandated by HUD
- < 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
- < Establish and operate a coordinated assessment system for homeless individuals and families
- < Establish and consistently follow written standards for the provision of ESG and CoC assistance
- < Communicate Community Framework progress to the community
- < Meet HUD record keeping requirements, inclusive of CoC records
- < Plan and conduct a sheltered and unsheltered point-in-time count of homeless persons
- < Conduct annual gaps analyses of the homeless needs and services
- < Provide required information to complete the local Consolidate Plan(s)
- < Certify the applicants/projects for Ohio Development Services Agency (ODSA) grants

3. HMIS Operations

- < Ensure consistent participation in HMIS
- < Ensure the HMIS compliance with HUD requirements
- < Prepare the HMIS policies and procedures, privacy plan, security plan and data quality plan
- < Prepare annually System Performance Measures, Annual Performance Reports, Annual Homeless Assessment Report Data, and Analysis of National and Local Homelessness Data
- < 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 in accordance with 24 CFR part 580 to operate the Continuum's HMIS on the CoC's behalf.

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, prepare the CoC Application, and submit 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.

6. ODSA Application Processes

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

7. Letter of Support and Certification

Programs and services which meet the needs of homeless families and individuals 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 homeless or at risk of 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 and incorporate HUD requirements and local standards. CSB incorporates these standards into annual program agreements with each Partner Agency. 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 HUD pass-through-funded) or CSB Board Chair (if CSB-funded). CSB monitors program performance and provides monthly, quarterly, semi-annual and annual data reports. Program performance standards are reviewed and approved annually by the CoC Board.

9. Quality Improvement Intervention

CSB addresses programs of ongoing concern through a Quality Improvement Intervention (QII) process. The QII process is based on quarterly one-on-one dialogues between CSB and the Partner Agency and considers agency plans and progress on addressing program issues. CSB and Partner Agency enter into quarterly QII 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 QII process is not working, either may refer the concerns/issues to the CoC Board for handling. The Partner Agency will be given an opportunity to present its case to the CoC Board before it makes its recommendation to the CoC.

10. Through its evaluative work, CSB establishes performance ratings every year of each HUD pass-through-funded and CSB-funded programs. Based on these ratings, CSB recommends the CoC Board programs that should not continue to receive funding through the annual HUD application process due to underperformance. All programs rated as “Low” performers through CSB’s annual Program Evaluation are discussed at the CoC Board. CSB recommends to the CoC Board any funding reallocations that should occur 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.

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.csb.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 and distributed within 30 days of the meeting.
- < Materials are posted on CSB’s 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 / Columbus ServicePoint Implementation

CSB, as the CoC-designated HMIS Lead, maintains the community's Homeless Management Information System (HMIS) – Columbus ServicePoint – in compliance with HUD 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.

1. CSB has the following roles:

- < Make decisions about HMIS management and administration
- < Designate a single information system as the official HMIS software for the geographic area
- < Develop all policies and plans the HMIS lead is required to develop. Annually update the Security Plan, Data Quality Plan, and Privacy Policy
- < Develop a governance charter and document all assignments and designations consistent with the governance charter. The charter is to contain, at the minimum:
 - o 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;
 - o The participation fee charged by the HMIS; and
 - o Such additional requirements as may be issued by notice from time to time.

2. Ensure the operation of and consistent participation by recipients of funds from the Emergency Solutions Grants Program and from the other programs authorized by Title IV of the McKinney-Vento Act. Duties include establishing the HMIS; conducting oversight of the HMIS; and taking corrective action, if needed, to ensure that the HMIS is compliant with all HUD requirements; Ensure that all recipients of financial assistance under the Continuum of Care program and the Emergency Solutions Grant program are using the HMIS to collect client-level data on persons served.

3. Develop written HMIS policies and procedures for all CHOs for the operation of the HMIS;

4. 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;

5. 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;
6. Monitor and enforce compliance by all CHOs with the requirements of this part and report on compliance to CoC Board and HUD;
7. The HMIS Lead submits a security plan, a data quality plan, and a privacy policy to the CoC Board annually for approval. The HMIS Lead reviews and updates the plans and policy at least annually. During this process, the HMIS Lead seeks and incorporates feedback from the CoC Board and CHO. The HMIS Lead implements the plans and policy immediately after approval by the CoC Board.
8. The HMIS Lead develops a privacy policy. 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.
9. The HMIS Lead establishes a security plan which meets the minimum requirements for a security plan as established by HUD in notice.
10. The HMIS Lead designates a security officer to be responsible for ensuring compliance with applicable security standards. The HMIS Lead designates one staff member as the HMIS security officer.
11. The HMIS Lead ensures that each covered homeless organization designates a security officer and conducts workforce security measures.
12. The HMIS Lead conducts workforce security screening; The HMIS Lead ensures 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.
13. The HMIS Lead reports security incidents. The HMIS Lead implements 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.
14. The HMIS Lead establishes a disaster recovery plan. The HMIS Lead develops 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.
15. The HMIS Lead conducts an annual security review. The HMIS Lead completes 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.

16. The HMIS Lead ensures that each user completes security training at least annually and prior to given access to the HMIS.

17. The HMIS Lead ensures that each covered homeless organization conducts an annual security review.

18. The HMIS Lead sets data quality benchmarks including bed coverage rates and service-volume coverage rates.

19. The HMIS Lead develops and implements a data quality plan.

20. The HMIS Lead archives data in the HMIS but follow standards published in the Federal Register notices.

21. The HMIS Lead, at least annually, or upon request from HUD, submits an unduplicated count of clients served and an analysis of unduplicated counts.

22. The HMIS Lead submits reports to HUD as required.

VI. Partner Agency and Citizen Advisory Council Activities

1. Partner Agency Input

The CoC values input and participation by the HUD Partner Agencies in all processes. These shall include:

- < 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 Framework. 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 together with conveners, collaborators, and funders to build support for programs
- < Share and implement best practices and collaborate with other Partner Agencies
- < Work together 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 HUD Funding and intends to treat all Partner Agencies fairly in evaluating performance.

Requirements:

- < 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 Columbus ServicePoint
- < Submit HUD APR data to CSB, as needed

Rights:

- < Participate in Quality Improvement Intervention (QII) 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 supportive housing 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

Committees

The following committees are currently operational. These committees are also staffed by Community Shelter Board 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 homeless single adults.

2. Family System Operations Workgroup (FSOW) – a Partner Agency group comprised of representatives of non-profit agencies operating the emergency shelters for families, the local domestic violence Partner Agency, the coordinated point of access to emergency shelter, providers of rapid re-housing services, and providers of family prevention activities. The group meets at least monthly to further the provision of services for homeless families.

3. Permanent Supportive Housing Roundtable – a Partner Agency group comprised of representatives of non-profit agencies operating the permanent supportive housing programs in the community, the local mental health and substance abuse board, and the local 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 (CSP) Administrators Group - a Partner Agency group comprised of representatives of non-profit agencies using the local homeless management information system, Columbus ServicePoint (CSP). Each agency that has access to CSP must have a designated primary and backup administrator. Both are invited to participate at this quarterly meeting 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 that has membership comprised of homeless and formerly homeless individuals. This group meets monthly. The CoC values input and participation by the CAC in all processes. These shall include:

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

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 providers, 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 – The Committee 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 – The Workgroup 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.

Final 8.30.12
Updated 5.16.13
Updated 8.5.13
Updated 5.20.14
Updated 10.14.14
Updated 6.03.15
Updated 1.08.16
Updated 6.1.16
Updated 11.14.16
Updated 5.16.17
Updated 6.19.17
Updated 7.5.17
Updated 6.5.18