Louisville Metro Continuum of Care Policies and Procedures

In 1987, Congress passed the first federal law specifically addressing homelessness. The Stewart B. McKinney Homeless Assistance Act of 1987, later renamed the McKinney-Vento Homeless Assistance Act, provides federal financial support for a variety of programs to meet the many needs of individuals and families who are homeless. The housing programs it authorizes are administered by the Department of Housing and Urban Development's (HUD) Office of Special Needs Assistance Programs (SNAPS). Since 1994, HUD has required each community to come together to submit a single comprehensive Continuum of Care (CoC) application rather than allowing applications from individual providers in the community. HUD's intent in creating this structured application process was to stimulate community-wide planning and coordination of programs for individuals and families who are homeless. (HUD's Homeless Assistance Programs: Continuum of Care 101, June, 2009)

In 2009, the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 was signed into law. The HEARTH Act amends and reauthorizes the McKinney-Vento Homeless Assistance Act with several substantial changes. Traditional beliefs around what is most effective in addressing homelessness have been evaluated and there are aggressive expectations for programs to move people into permanent housing as soon as possible. The task of keeping people in permanent housing is also receiving new attention with goals addressing recidivism and length of stay in permanent housing.

The Louisville Metro CoC is participating in the nationwide effort to evaluate and improve homeless service provision. The Louisville Metro CoC takes seriously the new HUD mandates and seeks to incorporate them in ways that make sense for this community at this time in history. To that end, the Louisville Metro CoC seeks to establish its governance, its policies and its procedures to not only align with HUD's expectations but to create a service provision system that first and foremost provides appropriate services to those who find themselves homeless and assists them in permanently moving out of homelessness. It is the intent of the Louisville Metro CoC to create an understanding of the reality of homeless in Louisville Metro and encourage a community wide response to reducing and eliminating it.

Louisville Metro Continuum of Care (CoC) Geographic Area
- The Louisville Metro CoC geographic area is defined as Louisville Metro with the six digit code of 211374. This area includes all of Jefferson County, KY.

Louisville Metro CoC Values, Priorities and Goals
Louisville Metro CoC Values
- We value programs with outcomes that demonstrate progress toward reducing and ending homelessness as quickly as possible with an ultimate goal of no more than 30 days.
- We value innovative and diverse programming that addresses gaps in community services.
- We value quality programming that is accountable to the community through outcomes measurement.

- We value the effort to access the maximum amount of funding available to the Louisville Metro area.
- We value the commitment to serve all people who are in need of assistance regardless of race, gender, age, national origin, sexual orientation, gender identity and class and to be in compliance with all applicable laws regarding program accessibility for all people.
- We value and respect the decisions and choices of those who find themselves homeless and seek to optimize self sufficiency.

Louisville Metro CoC Priorities
- Moving people and families out of homeless is our number one priority.
- Provide safe shelter to those in need who choose to use the shelter system.
- Provide timely assistance to those seeking to move out of homelessness regardless of shelter use or choice.
- Make all available services accessible to those who find themselves homeless.
- There is a comprehensive and holistic approach to identifying and providing services to assist those who find themselves homeless before, during and after moving to permanent housing.
- The goals and objectives of those whose funding is used to provide shelter and services are respected.
- There is a focused effort to refer and connect those who find themselves homeless to mainstream services outside the homeless provider system.
- Providers seek choice, safety, affordability, integration, accessibility and supports when helping clients' access permanent housing.

Louisville Metro CoC Goals
These are only a few of the goals of the Louisville Metro CoC "Blueprint to End Homelessness" that directly tie to the goals of the HEARTH Act.
- To divert people and families from the experience of homelessness.
  - Whenever possible, those who present themselves to the single point of entry will be diverted from the homeless provider system.
- To move people and families out of homelessness.
  - New clients to the homeless service system will exit emergency shelter on average in 6 months and transitional housing on average in 12 months.
  - 85% of those who enter the Rapid Re-housing program will not re-enter the homeless provider system within 6 months of the end of their Rapid Re-housing assistance.
  - 80% of those who enter transitional housing programs will move to permanent housing.
  - 80% of those placed in permanent housing will remain there for 12 months or longer.
- HMIS data will be used to determine the outcomes of individual projects and the CoC as a whole.
  - 90% of shelter beds will be entered into HMIS.

o   30% of those entered in HMIS will have an exit destination.

Louisville Metro CoC Full Membership

At the center of the Louisville Metro CoC process is the CoC full membership made up of nonprofit agencies, individuals, private businesses and government representatives at all levels. It is the body that ultimately holds the responsibility for making the decisions regarding the process and the final submission of the CoC grant as well as setting benchmarks to monitor both CoC and ESG Programs. The Louisville Metro CoC full membership has found that by working together the final product is one that the whole community can embrace and to which it can be committed.

Full Membership Responsibilities

The Louisville Metro Full Membership is made up of agencies who serve the homeless population, agencies who serve those who are at risk of homelessness, governmental departments charged with addressing homelessness and individuals who are interested in addressing the issue of homelessness in the Louisville Metro community. The full membership body is responsible for:

- Electing four of its members to represent the full membership on the CoC Board and approving the remaining CoC Board membership annually,
- Providing information and advice to the CoC Board regarding best practices in homeless services,
- Establishing and providing oversight of the HMIS system and designating an HMIS administrator,
- Striving to provide the best services to each of the community's specific homeless populations,
- Establishing monitoring standards and outcomes and providing oversight of the implementation of this monitoring through the city and CoC,
- Working within the CoC homeless provider system to provide comprehensive and appropriate services to move homeless persons as quickly and appropriately as possible,
- Participating on CoC Committees and in monthly full membership meetings,
- Reviewing, endorsing and establishing policies and procedures including the process of Board selection,
- Approving and ranking projects to be included in the community CoC application and designating a collaborative applicant and insuring that all discussion on review and ranking procedures are reflected in the minutes and posted for community review ,
- Developing and following a governance charter detailing the responsibilities of all parties,
- Consulting with recipients and subrecipients to establish performance targets appropriate for population and program type, monitoring the performance of recipients and subrecipients, evaluating outcomes, and taking action against poor performers,
- Evaluating and reporting to HUD outcomes of ESG and CoC projects and consulting with ESG and CoC applicants regarding allocations,

- Establishing and providing oversight of a coordinated assessment system and single point of entry and designating a lead for each,
- Conducting a Point-in-Time count of homeless persons, at least biennially,
- Conducting an annual gaps analysis, and
- Providing information required to complete the Consolidated Plan.

Full Membership and Voting Rights
The CoC community is the ultimate decision making body for the Louisville Metro CoC. The community itself holds the responsibility of deciding the needs of the community, how the process is to be administered, endorsing the projects to be submitted for funding consideration and the community priority rankings.

It is the policy of the Louisville Metro CoC that each CoC member/agency:
- Holds one vote,
- Designates a delegate and an alternate who are authorized to cast the agency vote when such action is needed,
- Is allowed to send more than these designated people to the community meetings but when a vote is taken, only the delegate or alternate is eligible to cast a vote,
- Is required to send a representative to at least 10 out of the last 12 community meetings prior to the vote in order to be eligible to cast a vote,
    - If an agency is unable to send either the delegate or alternate, that agency may send a representative to the meeting and receive credit for attendance. However, only a delegate or alternate has the right to vote on any issue.
    - If an agency has not been a member of the CoC for a full twelve months at the time of a vote, the number of absences allowed that agency will be proportional to the number of months they have been a member of the CoC.
- Is not eligible to vote on any issue regarding a project where that agency/member has a financial interest or serves the project's agency in any capacity, and
- Has the right to submit new and renewal proposals within the guidelines and specifications of the U.S. Dept. of Housing and Urban Development. (The full membership then has the right and responsibility to decide which projects are to be included in the CoC application.)

The CoC community voting procedure for funding decisions and representation on the Advisory Group may be carried out within a CoC meeting of the members or through other means (email, U.S. Postal Service, FAX) as long as each completed ballot is:
- Designated for an eligible voting member (agency), and
- The ballot contains the signature of the CoC delegate or alternate.

According to HUD requirements, the membership of the Louisville Metro CoC must be inclusive of the many facets of the community which it represents. The Louisville Metro CoC membership consists of over 80 entities representing:
- The Public Sector
    - State government agencies

- o Local government agencies
- o Public housing agencies
- o School systems and universities
- o Law enforcement and corrections
- o Local Workforce Investment Act boards
- o Other state and national level groups and persons
- The Private Sector
  - o Non-Profit organizations
  - o Faith-Based organizations
  - o Funders and advocacy groups
  - o Businesses including banks, developers and business associations
  - o Hospitals and medical representatives
  - o Homeless persons

Each member entity of the continuum holds the right to cast one vote per question. This means that entities sending more than one representative to the community meetings are restricted to casting one vote per question. Individuals representing themselves also have the right to cast one vote per question. A delegate and an alternate are designated by the participating entity at the beginning of the continuum year (July).

Other responsibilities of member agencies include:
- Demonstrating the ability and willingness to work with others in the community by collaborating with agencies to provide services,
- Providing documentation of homelessness and other required information to other member agencies in order to facilitate a seamless provision of care, and (This is expected to be done with the understanding that the person seeking assistance has granted a release of the information.)
- Fully participating in the Louisville Metro Homeless Management Information System (HMIS).

Responsibilities of the Delegate and Alternate
Each member entity of the Louisville Metro CoC full membership designates a delegate and alternate at the beginning of the continuum year (July). Their responsibilities include:
- Attendance at CoC community meetings: Each entity must have a representative present at community meetings in order to cast a ballot regarding submission of projects to HUD for funding. (See Attendance Policy) This is to insure that when questions come up for a vote, those voting are fully informed of the circumstances and ramifications of the question. It is hoped that this will lead to more informed decision making by those voting.
- Sharing information with agency directors and staff: it is the responsibility of the delegate and alternate to share all relevant CoC information with agency Director and necessary staff so the best decisions are made in terms of continuum votes and

applications. Information shared by the CoC Coordinator at the CoC monthly meetings is critical when making important funding decisions.

- Representing the interests of their member agency while considering the needs of the community as a whole: It is important that those representing member entities represent the interests of those entities. It is the responsibility of the delegate and alternate to put aside personal preferences and goals in order to truly represent their entity. It is also important for the delegate and alternate to be able to examine the needs of the community as a whole. When casting a vote on a particular question it is sometimes necessary to cast the vote for the good of the community putting aside the immediate need of the entity the person is representing. This is a delicate balance requiring insight and good judgment.
- Determining the projects that are sent to HUD Washington for funding consideration: Delegates and alternates must consider the best interest of homeless clients and the community as a whole in selecting projects for funding and ensuring those projects are ranked by the CoC community.

<u>Attendance Policy</u>

The Louisville Metro Continuum of Care full membership values the input and participation of a wide range of community volunteers, agencies, civic organizations, business partners and government officials. The Louisville Metro CoC full membership also believes that in order to insure the most informed and objective decisions regarding homeless issues and funding it is necessary that voting members of the CoC make every effort to attend the monthly CoC meetings. Therefore the following policy has been adopted:

- Each voting entity will designate a delegate and alternate for the purpose of voting.
- The delegate or alternate must attend 10 out of the last 12 monthly meetings prior to a vote being taken.
- In case of emergency, a third person representing the agency can be sent as a note taker to a meeting but this person does not have the right to cast a ballot unless this person is approved by the CoC coordinator in advance of the meeting.
- There will be some meetings that require mandatory attendance of the delegate or alternate.
- Delegates and alternates will be notified of mandatory meetings by the Coalition staff.
- Voting entities that fail to have a delegate, alternate or, in case of an emergency, a third person to act as a note taker at 10 of the last 12 monthly meetings prior to a vote and/or fails to have the same representing the entity at the mandatory meetings will not be able to cast a ballot regarding projects to be submitted in the U.S. Dept of Housing and Urban Development CoC application or the election and approval of CoC Board Members.

Louisville Metro CoC Board

To carry out the primary purpose of the CoC Program, HUD requires representatives of relevant organizations (e.g., nonprofit organizations, victim services providers, local governments) to form a CoC to serve a specific geographic area. In addition, each CoC must establish a board to

act on its behalf, and the CoC may appoint additional committees or workgroups to fulfill its responsibilities. (Introductory Guide to the CoC Program, HUD, July 2012)

Governance Charter

A Governance Charter outlining the roles and responsibilities of the Louisville Metro CoC Board, Full Membership, HMIS Administrator, Collaborative Applicant, and Agency Members must be updated and signed by the CoC board prior to the submission of the Louisville Metro CoC application each year.

Role of the Board

It is the responsibility of the Louisville Metro CoC Board to:
- Designate the entity that is to write the application for funding in response to HUD's annual CoC Program NOFA for homeless assistance resources,
- Design, operate and follow a collaborative process for developing the application and approving its submission,
- Establish priorities for funding projects in the CoC geographic area,
- Review the monitoring of all providers and determine appropriate action when benchmarks are not met,
- Provide a vision, priorities and goals for the CoC community,
- Establish a process for funding recommendations through HUD and other funding streams available in the community and insure that all discussion on review and ranking procedures are reflected in the minutes and posted for community review, and
- Oversee progress of HMIS entry, common assessment and single point of entry and make recommendations for improvement.

Louisville Metro CoC Board Membership

The Louisville Metro CoC Board is elected from the full membership at a CoC full membership meeting or through other means (email, U.S. Postal Service, FAX) and must:
- Include at least one homeless or formerly homeless individual and
- Represent the relevant organizations and projects serving the homeless including:
    o Persons with substance use disorders,
    o Persons with HIV/AIDs,
    o Veterans,
    o The chronically homeless,
    o Families with children,
    o Unaccompanied youth,
    o The seriously mentally ill, and
    o Victims of domestic violence, dating violence, sexual assault and stalking.

The Louisville Metro CoC Board is made up of no less than 15 and no more than 21 members. It should always have an odd number of members including:
- Four representatives of the Membership Body,
    o Elected by the membership body for two year staggered terms, and

- o These representatives can serve two consecutive 2 year terms but must be off the board for one year before being elected by the membership body again.
- A homeless or formerly homeless person,
- A representative of the ESG recipient (Louisville Metro Government), and
- Community representatives and leaders.

In order to do binding business, there must be a quorum of at least 51% present for a Board vote. The Board will elect its own Chairperson, CoC Coordinator and any other roles as seen fit by the Board. Only one person per agency may serve on the Board at any given time and provider agencies represented on the Board can have a proposal on the table although they should not vote on these issues.

Qualities and Skills of the Louisville Metro CoC Board
In order to carry out the role and function of the CoC Board, it is recommended that the following qualities and skills be represented within the Board.

- The ability to remain open and flexible to the needs of the service providers, the regulations presented by HUD, the needs and wishes of the CoC full membership and the needs of the homeless population.
- The ability to consider conflicting needs and come to resolution in the best interest of the CoC full membership.
- The ability to understand and evaluate a budget.
- The ability to understand and evaluate program outcomes in relation to the Louisville Metro community and HUD guidance.
- The ability to see and understand the "big picture"

Code of Conduct
The Louisville Metro CoC submits a Code of Conduct annually through the CoC application which should be voted on and followed by the full membership. It includes:

- **Conflict of Interest**
  All members of the CoC Board are required to sign a conflict of interest form stating their association with agencies and projects that can reasonably be expected to apply for and/or receive funding through the CoC process. All associations will be made public to the full membership prior to any process that will determine funding recipients. Members with a conflict of interest are expected to recuse themselves from discussions and decisions where there is a real or perceived conflict of interest.

- **Confidentiality**
  Information contained in the ESG and CoC applications and reports is considered proprietary and confidential and may not be released to any person or party without approval of that applicant agency.
  Any client information shared within the CoC is also confidential and should not be released to any other entity without a release of information singed by the client.

Louisville Metro CoC Committees

The Louisville Metro CoC Full Membership may see fit to create new committees to conduct the work of the Louisville Metro CoC at any time. At this time, the following CoC Committees have been established:

HMIS

The HMIS Committee meets quarterly before the full membership meeting to discuss changes and issues with the Louisville Metro CoC HMIS system. The committee is open to all but is made up primarily of those who enter HMIS data at each of the homeless service agencies.

Discharge Planning/Homeless Prevention Pilot

The Discharge Planning Committee meets quarterly to discuss ways to improve the discharge planning from state and local institutions including prisons, jails, mental hospitals and institutions, hospitals and foster care. The committee is open to all and includes representatives of these institutions as well as staff who participate in the homeless prevention program which serves those exiting state institutions.

Housing First

The Housing First Committee meets quarterly to discuss the progress of Housing First programs in Louisville Metro. The committee is made up of persons involved in the SAHMSA Housing First Projects, SHP Housing First Projects and Rx: Housing Project (100K Homes).

Consumer Participation

The Client Engagement Committee meets as needed to seek input from clients of homeless services. The committee is open to anyone but includes four volunteers representing ESG, SHP and two persons with no conflict of interest. Information is gathered from forums held at various shelters in the community over the course of the year and annually at the Project Connect/Stand Down where all people who are experiencing homelessness are invited to receive services at a one stop shop offered over the course of a full day.

Common Assessment/ Mainstream Services

The Common Assessment/Mainstream Services Committee meets as needed to create and oversee the Louisville Metro CoC Common Assessment. They also insure that the common assessment includes a process to assess and refer each CoC client for all appropriate mainstream services. To date, the committee has created the assessment tool and helped to create a funding plan for the assessment and staffing. The next step is to develop the details of how it will be implemented at each of Louisville's emergency shelters and then to monitor implementation and provide comment.

Coalition Supporting Young Adults

The Coalition Supporting Young Adults was created in response to the rising number of young adults staying in Louisville adult shelters in 2012 (555). This committee is made up of agencies that serve 16-24 year olds in crisis without support throughout the city. Their role is to make recommendations to lower the number of young adults in crisis and prevent the cycle of homelessness in the next generation.

Louisville Metro CoC Collaborative Applicant

Because the Louisville Metro CoC Board is made up of volunteers, they will need to select a Collaborative Applicant to submit the CoC application to HUD each year.

Role of the Collabrative Applicant

It is the responsibility of the Louisville Metro CoC full membership to designate a collaborative applicant best able to insure a successful submission of the CoC proposal. It is the role of the Collaborative Applicant to:

- Complete the electronic application in response to HUD's annual CoC Program NOFA for homeless assistance resources,
- Present a timeline and deadlines to all project applicants for individual project plans,
- Collect all data and submit a renewal chart to HUD of all projects planning to reapply,
- Create the housing inventory chart,
- Create the grant inventory worksheet,
- Establish priorities for funding projects in the CoC geographic area,
- Create process for ranking applications with full participation of CoC full membership,
- Oversee committees and volunteers,
- Create agendas for CoC full membership and Board meetings in collaboration with the Board Chair,
- Notify others that they can join the CoC full membership annually, and
- Monitor who is eligible to vote on the full membership.

The Louisville Blueprint to End Homelessness

History

In 2000, members of the Coalition for the Homeless began work on a plan entitled "Reducing and Ending Homelessness: A Blueprint for the Future." This report was released in 2002 and outlined ten goals with action steps for eliminating homelessness in Jefferson County, Kentucky. In 2007, the Coalition for the Homeless joined forces with Louisville Metro's Office on Homelessness to update the plan. It was updated again in 2012 to include the newly established federal policies in the federal "Opening Doors" Plan.

Louisville Metro CoC Blueprint Priorities

- Increase Leadership, Collaboration and Civic Engagement
- Increase Access to Stable and Affordable Housing
- Increase Economic Security
- Increase Health and Stability
- Retool Crisis Response

The full plan with specific goals is available at The Coalition for the Homeless website – www.louhomeless.org.

Update Process

Each year, The Coalition for the Homeless documents progress made on each of the "Blueprint" goals and presents to the Louisville Metro CoC full membership as an annual report. These numbers are also included in the CoC application for funding.

Annual Point in Time / Quarterly Shelter Point in Time/Census

The Louisville CoC conducts its annual point in time on the last Wednesday of January. This point in time count includes both a shelter count and a street count. The Louisville CoC also conducts a quarterly point in time on the last Wednesday of the first month of each quarter. (January, April, July and October). The April, July and October quarterly point in time counts are limited to those using the shelter system. During the quarterly point in time counts, shelter bed and unit counts are also conducted. HMIS data is used to determine information needed to account for sub populations. This information is extrapolated to the persons staying on the streets that night.

Street Count

As required by the U.S. Department of Housing and Urban Development, The Coalition for the Homeless conducts a one-day, point-in-time count of homeless persons the last week of January each year. The Coalition solicits local volunteers who go out in groups to count homeless persons at day shelters and on the streets. Meanwhile, night shelters complete the surveys at their facilities. The volunteers are asked to survey a minimum of one-third of those counted using a survey created by Kentucky Housing Corporation. This survey is used statewide on the same day. The Coalition collects personal items to also be distributed to homeless persons during the survey to increase the willingness of people to participate and provide items needed for safety and security when sleeping on the streets in the dead of winter.

Once the one-day survey is completed, The Coalition for the Homeless uses the survey data along with HMIS data to extrapolate the survey answers of persons who were counted but not surveyed to get a better understanding of those who are homeless on a given night in Louisville Metro.

Homeless Census

In addition to the one-day survey, The Coalition for the Homeless collects information on all persons served in the Louisville Metro homeless system in a given year. This information is gathered from the HMIS data provided by agencies and through the new single point of entry.

Each June, the Point-In-Time and Annual Homeless Census information is released to the public and media. The Coalition for the Homeless also studies this information to determine what changes could improve the CoC.

Homeless Management Information System (HMIS) and Single Point of Entry

HMIS Roles and Requirements

Uniform, longitudinal data is necessary to understand the extent and scope of homelessness in individual communities and across the country. It provides the community with a tool to collect and analyze ongoing data on people using homeless service programs. Accurately calculating

the size and needs of the homeless population as well as the outcomes of specific interventions provides a means for tracking service and demand for homeless programs and understanding where improvements need to be made.

The Louisville Metro CoC full membership chose The Coalition for the Homeless to serve as the administrator of the U.S. Department of Housing and Urban Development (HUD) mandated HMIS for Louisville Metro. The Louisville CoC is part of a state-wide HMIS system, called Kentucky HMIS. KYHMIS is managed by the Kentucky Housing Corporation in Frankfort, KY and uses Servicepoint software.

The Coalition for the Homeless manages the Louisville Metro CoC HMIS through a full-time HMIS Coordinator. This staff salary and the expenses of the HMIS system, including Servicepoint software licenses for Coalition agency members, are paid for through a HUD CoC HMIS grant and match funds raised locally. The HMIS Coordinator reviews the licenses each year to determine which have been unused and recaptures those licenses. Each CoC agency member can purchase one license per program at half price and all others must pay full price. Agencies are charged for these additional licenses annually. Small homeless agencies with no federal funding can receive one free license per year.

The CoC HMIS administrator is responsible for:

1. Maintaining compliance with the latest HMIS Data and Technical standards published by HUD,
2. Accurately calculating the size and needs of the homeless population,
3. Tracking service and demand for homeless programs and understanding where improvements need to be made,
4. Overseeing the reporting process for the CoC,
5. Training agencies on accurate HMIS entry,
6. Reviewing the licenses of member agencies each year to determine which have been unused and recapture a needed, and
7. Coordinating a single point of entry to insure new clients are eligible for services and entered correctly.
8. Reporting as necessary to various entities such as Louisville Metro Government, the Kentucky Housing Corporation, the U.S. Department of Housing and Urban Development, etc.

Kentucky Housing Corporation assigns a security officer to oversee all security issues related to the Kentucky HMIS. Anyone with concerns should immediately contact the security officer. Also, the HMIS Coordinator performs an annual check on the Louisville Metro HMIS to insure that all security standards are being met.

Single Point of Entry
The Louisville Metro CoC requires universal data elements be collected on each new CoC client. This information is collected by The Coalition for the Homeless through the single point of entry. This information can be collected by phone or in person at the single point of entry

office. The client is asked to sign a release of information and these data elements are made available to all HMIS users. It is also the responsibility of the CoC single point of entry staff to:

- Record numbers of those they serve daily,
- Evaluate eligibility for homeless assistance programs,
- Divert anyone who is appropriate to homeless prevention services versus shelter,
- Reserve a bed in a local shelter for anyone who qualifies,
- Make a referral for shelter overflow if no beds are available, and
- Create a scan card for all newly entered clients that they can use for entry to future homeless services.

Once a client arrives for services at a homeless service agency after the single point of entry assessment, HMIS allows the agency to see if the client was already entered for prior services so they do not duplicate entry. The service provider is responsible for updated HMIS when new services are provided to a client, when their income or housing changes, once a year for an annual update and at program exit. A privacy notice is given to clients and posted at shelters informing them that their data will be entered in HMIS. It also specifies the data protection standards that are to be followed. If a client arrives at a shelter after hours and has not presented at the single point of entry, they should not be denied services if a bed is available. Instead, they can complete a hard copy form for entry, fax it to The Coalition for the Homeless the following day for HMIS entry and refer the client when appropriate to get a scan card.

HMIS Technical Assistance and Training
The Coalition maintains an HMIS help desk through Outlook. When a request for assistance is received, it is automatically logged in the system. When the concern is addressed, this is logged by The Coalition for the Homeless staff for future tracking of technical assistance. Requests can be as little as forgetting a password or as great as hiring a new staff member who needs to be trained on the system.

The Coalition provides individualized, on-site technical support to member agencies as needed.

The HMIS Coordinator discusses HMIS changes with agency members at Louisville Metro CoC full membership meetings.

HMIS Quality Monitoring
During the time of the quarterly point in time counts two HMIS data quality processes are conducted.

- Agencies are expected to submit a manual count of the persons staying in each homeless program along with a manual count of the beds and units available on that particular night.
- A one night point in time report is also run from HMIS by the agency and compared to the manual count. Any discrepancies in the numbers should be resolved before the reports are submitted to The Coalition for the Homeless.

- The combined information of number of available beds/units and the manual count of persons staying in the shelter is compared to establish a project's capacity rating for that night.

Minimum Data Sets and Data Quality
The Coalition for the Homeless manages the HMIS database in Louisville Metro and works with the CoC Board to establish minimum data sets the data quality (DQ) standards. Data Quality is checked once each quarter to coincide with the Point in Time dates.

Data quality standards
There are two parts to Louisville data quality standards: data quality and data accuracy.
For data quality, the program must have the minimum data sets entered for each client client at exit. For the data accuracy standard, the client and household counts in HMIS must equal the hand counts submitted by the agency. While the data quality is inspected quarterly, it is the expectation of the Louisville Metro CoC that each agency will update all clients including program exits within a week.

The Coalition for the Homeless will publicize Data Quality results during the monthly CoC full membership meetings and share this information with agency funders.

Housing Inventory Chart
It is the policy of the Louisville Metro CoC that the following guidelines and requirements be met in order for agencies and programs serving the homeless in the Louisville Metro community to be included in the U.S. Department of Housing and Urban Development's Housing Inventory Chart. This chart is meant to include all facilities and programs that provide sleeping accommodations to the homeless residing in the Louisville Metro CoC community regardless of whether HUD funding is received or used.

This chart is updated on a yearly basis at the time of the official HUD required Point in Time homeless count. The U.S. Department of Housing and Urban Development requires that local continuums conduct a point in time count bi-annually during the last week of January. The Louisville Metro CoC has elected to conduct the local point in time homeless count on a yearly basis. The annual count takes place on the last Wednesday of January and includes both those staying in shelter and those staying on the street.

Because HUD uses this chart to determine the capacity to serve the homeless, it is extremely important that facilities be identified as:
- serving only persons who meet the HUD definition of homeless or
- if only a portion of the facility's accommodations are provided to persons meeting the HUD homeless definition, only those accommodations actually providing service to persons meeting the HUD homeless definition be included in the Housing Inventory Chart.

The U.S. Department of Housing and Urban Development definition for homeless persons is as follows.

A person or family is considered to be homeless ONLY when he/she meets one or more of the categories below.

Category 1	Literally Homeless	1. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: a. Has a primary nighttime residence that is a public or private place not meant for human habitation; b. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs: OR c. Is exiting an institution where (s)he has resided for 90 days or less AND who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
Category 2	Imminent Risk of Homelessness	2. Individual or family who will imminently lose their primary nighttime residence, provided that: a. Residence will be lost within 14 days of the date of application for homeless assistance; b. No subsequent residence has been identified; AND c. The individual or family lacks the resources or support networks needed to obtain other permanent housing.
Category 3	Homeless under other Federal statutes The Louisville Metro CoC has chosen NOT to recognize this category at this time.	3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: a. Are defined as homeless under the other listed federal statutes; b. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;

		c. Have experienced persistent instability as measured by two moves or more during the preceding 60 days; AND d. Can be expected to continue in such status for an extended period of time due to special needs or barriers.
Category 4	Fleeing/Attempting to Flee Domestic Violence	4. Any individual or family who: a. Is fleeing, or is attempting to flee, domestic violence; b. Has no other residence; AND c. Lacks the resources or support networks to obtain other permanent housing.

Facilities listed on the Housing Inventory Chart are expected to maintain the following:

- A current license for serving homeless persons issued by Louisville Metro Government.
  - In the case where the Director of the Louisville Metro Department of Codes and Regulations deems it more appropriate for the facility to obtain a conditional use permit in place of the license, such a permit will meet the need for a license.
- Only those beds/units designated for persons meeting the HUD definition of homeless can be included in the Housing Inventory Chart.
- Documentation for each person being provided accommodations stating that one or more of the HUD identified conditions is true if that person is being served as someone meeting the HUD definition of homeless.
- All persons identified as a person meeting the HUD definition of homeless must be entered into the Homeless Management Information System (HMIS) through the single point of entry. Domestic violence shelters are exempt from this requirement but are required to enter comparable information into a comparable data base.
- Participation in the annual point in time homeless count administered by The Coalition for the Homeless during the last week of January. Those persons included in the annual count must meet the HUD definition for being homeless.
- Quarterly participation in the Louisville CoC's shelter utilization count on the last Wednesday of the first month of each quarter. Those persons included in the quarterly count must meet the HUD definition for being homeless.

Application Process

The Louisville Metro CoC Process is a year round process that includes quarterly shelter point in time counts, HMIS data quality monitoring and an expectation that CoC members attend 10 of 12 monthly CoC full membership meetings. The full membership body holds the responsibility of making final funding and policy decisions but also has the right to delegate any of its authority and responsibility to the Louisville Metro CoC Board, Collaborative Applicant, HMIS Administrator, Common Assessment Administrator or others when needed.

Grant Inventory Worksheet

The Grant Inventory Worksheet is a tool used by HUD and the CoC to determine the amount of CoC funding needed to support the projects currently receiving funding through the CoC process. The Coalition for the Homeless, acting as the Collaborative Applicant, works with the applicant agencies to accurately reflect the grant funding provided by HUD during the most recent renewal or as amended. When the CoC, HUD and the agencies/projects agree that the information is correct, the CoC submits the worksheet per HUD's instruction.

Louisville Metro CoC Policy for Funding Consideration

HUD provides funding for homeless assistance programs authorized under the Stewart B. McKinney Act through the CoC competition. Annually, HUD releases a Notice of Funding Availability (NOFA) which details the requirements for the application. One requirement is that there be one Collaborative Applicant for all projects in the CoC. The Collaborative Applicant is responsible for submitting a comprehensive application that includes all projects seeking funding within the CoC geographic area.

To be eligible for funding consideration, applicants must meet the following criteria:
- Applicants must meet all HUD eligibility criteria.
- Applicants must meet the application deadlines set by the Louisville Metro CoC.
- Applicants must be a 501(c) 3, 501 (c) 4, PHA, or local government.
- Applicants must possess legal authority to apply for and receive funds and carry out activities authorized by the CoC Program.
- Applicants must provide the supplementary match funds required by HUD.
- Applicants must comply with HUD's standards for participation in a local Homeless Management Information System (HMIS) and the collection and reporting of client-level information.
- Applicants must participate fully in the CoC process to coordinate and integrate with other mainstream programs for which homeless populations may be eligible.
- Applicants must assume ultimate responsibility for preparing an accurate and complete application for submission to HUD that meets all federal rules and regulations.
- Applicants must be in compliance with all local, state, and federal civil rights laws and Executive Orders as well as all standards outlined by the U.S. Department of Housing and Urban Development.
- Applicants must agree to comply with federal Section 3 and Energy Star Compliance requirements.
- Applicants must insure that all kids under 18 are allowed to stay in shelter with their other family members.
- Applicants must insure that all children are enrolled in school.

In order to meet the local needs in serving the homeless population, the following guidelines have been established. These guidelines in no way prohibit any HUD eligible project from applying for HUD funding but rather state the community's priorities, encourage projects that

respond to local needs and position the community to bring maximum benefit to serving our homeless population.

<u>New Applicants</u>
- Housing related projects have been identified by the Louisville Metro CoC to be our highest priority and will be considered as such.
- HUD has indicated that the ideal ratio of housing to services dollars is 80/20. Projects with a ratio that is over 20% services dollars must be approved by the CoC full membership.
- New applicants must include homeless persons in the design, the implementation and/or the evaluation of programs and services.
- New nonprofit applicants must submit a copy of their current IRS form 990 and current list of volunteer board of directors.
- New applicants are required to describe how implementing the community's HMIS program will be funded.
- At the time of pre-application, new applicants are required to submit three (3) letters of support indicating the need for this project.

<u>Renewal Applicants</u>
- Renewal applicants must be current with the HMIS system and have accurately entered 75% of their client records as determined by the HMIS Coordinator.
- Renewal applicants must have submitted their most current APR and review letter from HUD to the CoC Board.
- Where applicable, renewal applicants must be in compliance with Louisville Metro Licensing requirements and the community's monitoring standards.

<u>Beginning the process for application</u>
The CoC Collaborative Applicant establishes the timeline for renewal and new project application in collaboration with the CoC Board. This is done in consideration of HUD timelines and the CoC's responsibility to respond to HUD requests.

At a time determined by the CoC Collaborative Applicant, the Pre-Application is made available to renewal and new projects. This Pre-Application determines what projects intend to apply for renewal funding and, if guidance is available for the opportunity for new funding, gives agencies the opportunity to indicate their intention for applying for new projects. Using the latest guidance from HUD, the CoC Collaborative Applicant reviews the pre-applications for application consistency with HUD guidelines. Ultimately, the purpose of the Pre-Application is to give the agency/project a template from which the actual application can be taken. The Pre-Application also provides the CoC Collaborative Applicant with budgetary information to begin to determine the amount of funding needed compared to the amount available.

Working with the agencies that have indicated an intention to apply for funding, the CoC Collaborative Applicant prepares the information to be reviewed by the CoC Board for further

guidance and critical evaluation. During this process the CoC Collaborative Applicant, along with the CoC Board, work to identify opportunities for the community to:

- Take advantage of specific HUD opportunities for funding,
- Present a clear case for the need for funding in the community, and
- Maximize the community's ability to retain and obtain as much funding as HUD makes available to the community.

While it is the responsibility of the CoC Collaborative Applicant to be educated about HUD rules and procedures, it is also the responsibility of the CoC full membership and applicant agencies to read HUD guidance and apply that guidance to the individual project applications and execution of the grants if received. It is also the responsibility of the agency/project applying and receiving funds to keep the CoC Collaborative Applicant informed of any changes that take place within the project. It is particularly important to inform the CoC Collaborative Applicant of changes in:

- Population served,
- Budget,
- Project funding and spending, and
- Basic design of the project.

In order to facilitate this process throughout the funding cycle, projects are required to submit the following to the Collaborative Applicant:

- The annual performance report (APR) at the same time it is submitted to HUD. HUD requires the APR to be submitted 90 days after the end of the project's operating year.
- The letter received from local HUD that the APR was received and approved.
- The HMIS report that mirrors the project's APR report (ART 625).
- A communication if the project did not spend the amount of funding received from HUD. The amount turned back should be included in a letter from HUD. It is generally accepted practice that projects can turn back approximately 5% of their grant and not be seen lacking the capacity to spend the money allotted to them. If the project is a rental assistance project, turning back the amount or rental assistance equal to or less than the amount of funds needed to house one household unit for 12 months using the smallest bedroom size allowed in the grant is generally accepted.
- All information required to complete the quarterly point in time counts – including the manual counts, HMIS reports and program capacity reports.
- All information required to complete the Housing Inventory Chart.
- All information required to complete the Grant Inventory Worksheet.
- The cost of services for each homeless program.
- All other information required to assemble the CoC application for funding.

It is expected that projects submit information on the required forms in a timely manner or communicate the need for an extension of a deadline – prior to the deadline – to the CoC Collaborative Applicant. The CoC Collaborative Applicant will make every effort to accommodate the need for deadline extensions in the case of emergencies and other

reasonable requests. It is paramount, however, that extensions do not adversely affect the timely submission of the community application and the timely submissions of other information required by HUD.

<u>Late Submission of Pre-Applications, Applications and Other Required Information</u>
In accordance with the U.S. Department of Housing and Urban Development (HUD) guidelines, the Louisville Metro CoC in no way prohibits any HUD eligible project from applying for HUD funding if done within the guidelines set up by the U.S. Department of Housing and Urban Development. However, in order for the Louisville Metro CoC to submit the best overall application for funding, certain guidelines and deadlines have been established.

It is the policy of the Louisville Metro CoC that when <u>Pre-Applications</u> are submitted after the stated CoC due date, whether for new or renewal projects, the following procedure will be followed:

- The pre-application will be reviewed using the process used for all other pre-application submissions. Since the primary purpose of the community's review process is to assist projects in submitting the best possible grant application, it is in the best interest of the entire community that all grants associated with the Louisville Metro CoC be reviewed for accuracy and completeness and be given the opportunity to improve the grant pre-application.
- The Louisville Metro CoC community holds the responsibility of approving projects to be included in the HUD application. As part of this process, voting members are given information regarding each renewal project's success in meeting both HUD and community goals. Information regarding new projects will include the agency's success in meeting HUD and community expectations in the past. The timeliness of a project's pre-application is included in this information.
- The Louisville Metro CoC full membership has several options open to it regarding the late submission of a pre-application. It can vote to:
  - Allow the project to proceed through the process with a warning but essentially unencumbered.
  - Allow the project to proceed through the process with the understanding that during the next funding application cycle another agency will be given the opportunity, within HUD guidelines, to assume the terms of the grant. This implies that the basic project will remain in the community under the new management of another agency.
  - Allow the project to proceed through the process with the understanding that during the next funding application cycle the CoC will invoke the HUD Reallocation process where another agency will be given the opportunity, within HUD guidelines, to submit a new permanent housing project within the budget constraints of the original project. This implies the current project will be discontinued at the time of HUD approval of the reallocation.
  - The CoC invokes the HUD Reallocation process where another agency is given the opportunity, within HUD guidelines, to submit a new permanent housing

project within the budget constraints of the original project. This implies the current project will be discontinued at the time of HUD approval of the reallocation.
  o The CoC invokes the HUD Reallocation process using the opportunity to fund a new HMIS project.
  o Defund the project during the current application process understanding that the funds normally allocated to this project are lost to the community.

It is the policy of the Louisville Metro CoC that when a new or renewal project fails to submit the <u>Application</u> within the CoC's stated deadline the following procedure will be followed:
- The Louisville Metro CoC Collaborative Applicant must first decide if there is time before the official HUD deadline to work with the application without putting all other projects in jeopardy of a late submission to HUD. This decision is made with consultation with the CoC Board.
- If it is decided that the project's application should be included in the submission, it will be the responsibility of the CoC Board to make a recommendation to the Louisville Metro CoC full membership for further action. The Louisville Metro CoC full membership will make the final decision regarding the matter.
- If it is decided that there is not sufficient time before the official HUD deadline, the CoC Collaborative Applicant will attempt to identify a reasonable way for the funds to be preserved within the CoC community. If such a way exists, the CoC Collaborative Applicant will work with the CoC Board to pursue such an option. If such a way does not exist, the funds are not applied for in the overall CoC application and the funds are lost to the community.

<u>Identifying Community Need for New and Expanded Services and Reallocation of Existing Funds for Maximum Use</u>
It is the responsibility of the CoC full membership, the CoC Board and the CoC Collaborative Applicant to constantly be looking for:
- The need for new or expanded services to the community,
- The need to discontinue services when they are no longer needed,
- The need to adjust services when realignment is necessary in order to best serve the homeless population of the Louisville Metro CoC,
- The Opportunity within the community and offered by HUD to improve services and pay for services once unable to be funded, and
- Creative ways to maximize the funding dollars available through HUD and other funding sources.

Meeting this responsibility is done in a variety of formal and informal ways, including:
- Conducting the yearly Homeless Point in Time Count that includes both a street count and a shelter count,
- Conducting the annual Homeless Census Count,

- Conducting the quarterly Homeless Point in Time Count that consists of only the shelter count,
- Comparing these counts to the Housing Inventory Chart to identify gaps in services,
- Listening to CoC members and their experiences of project capacity or lack thereof,
- Examining individual project outcomes in relation to CoC and overall HUD goals, and
- Examining overall CoC outcomes in relation to CoC and overall HUD goals.
- Using evidenced-based measurement tools created by HUD and HUD TA providers.

Ranking Projects

Each year, the U.S. Department of Housing and Urban Development creates priorities for funding of CoC projects. However, they first fund all eligible projects in tier one (above the renewal amount from last year) before funding those projects in tier two. Therefore, those projects in tier one are more likely to receive funding.

In order to determine the ranking of projects into these two tiers, the Louisville Metro CoC Board establishes priorities for ranking based on the CoC benchmarks already established by the CoC (see above). Presently, the established priorities are:

1. Permanent Supported Housing
2. Meeting the appropriate permanent housing goal (77% of PSH staying in PH 6+mo. - this is now 80% / 65% of TH leaving for PH)
3. Reasonable capacity rates and the lesser of: no more than 5% of funds returned or no more than what it would take to house one household for one year.

Any project that has not met the CoC goals listed above in priority two or the capacity rates listed above in priority three is asked to present their project and address these shortfalls at a CoC meeting. Then each CoC representative is asked to vote on the following to establish the ranking:

A. First, you are asked to indicate any project you feel should not be included in the application submission.
B. Second, you are asked to indicate how you would rank any projects that did not meet their HUD housing goal or that would be ranked in tier two.

Common Assessment

In order to help homeless persons move more quickly and consistently through the Louisville Metro CoC, the CoC has created a common assessment to be conducted with each client within 14 days of shelter entry. This assessment is led by staff of a common assessment team.

Common Assessment Team Roles

It is also the responsibility of the CoC common assessment staff to:

- Record numbers of those they assess,
- Seek to assess each shelter client within 14 days of shelter entry,
- Evaluate eligibility for homeless assistance programs,
- Prioritize who receives transitional housing,

- Prioritize who receives rapid rehousing,
- Make referrals as appropriate to permanent supportive housing,
- Make referrals for mainstream services, and
- Insure that the needs of special needs clients are addressed and referrals are made for special services.
- Provide assessment information to referral agency and post in HMIS.

<u>Prioritization of Those Waiting to be Housed Through Common Assessment Referrals</u>

For CoC SHP openings dedicated to the chronically homeless, the following priorities are used:

1) First Priority–Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.
2) 2) Second Priority–Chronically Homeless Individuals and Families with the Longest History of Homelessness.
3) Third Priority–Chronically Homeless Individuals and Families with the Most Severe Service Needs.
4) Fourth Priority–All Other Chronically Homeless Individuals and Families.

For CoC SHP openings not dedicated to the chronically homeless, the following priorities are used:

1) First Priority–Homeless Individuals and Families with a Disability with the Most Severe Service Needs.
2) Second Priority–Homeless Individuals and Families with a Disability with a Long Period of Continuous or Episodic Homelessness.
3) Third Priority–Homeless Individuals and Families with Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters.
4) Fourth Priority–Homeless Individuals and Families with a Disability Coming from Transitional Housing.

These priorities can only be met when the size and design of the facility opening also fits the need of the next person identified using these priorities. If not, the common assessment team will serve the next person on the list. These priorities will be used in combination with special set asides made available as part of the federal goals outlined in Opening Doors. Therefore, units set aside for veterans will only be used for that population, however, the veterans will still be referred in the order listed above.

Monitoring Standards

The Coalition for the Homeless introduced the concept of setting standards for local shelter providers in 1990. While other communities had established standards in the areas of health and safety, Louisville created an additional set of standards in the area of programming. In 2011, Louisville Metro creating licensing for shelters so The Coalition now monitors a list of standards created by the CoC separate from the licensing standards.

Standard Process

These unmandated standards are coupled with a city zoning and inspection process that focuses on building safety and health standards. These standards can provide the client, the shelter and the larger community with the assurance that the client is being given the best possible opportunity to move back into a stable living environment and achieve self-sufficiency outside the shelter system.

Monitoring outcomes and standards are monitored through HMIS reports, items submitted to the Coalition electronically and on site visits as needed.

Blueprint University Training

The Coalition staff identifies training needs of member agencies each year and conducts a minimum of six trainings for front-line shelter staff in these areas. These free trainings are provided to member agencies as part of their membership fee. Other community members are welcome to attend as space permits.

Past Blueprint University topics have included: chemical dependency, child sexual abuse, client interaction and confidentiality, crisis intervention, communicable diseases, cultural diversity, domestic violence, food service, mental health issues, and universal precautions. Some topics may differ yearly depending on the needs of the homeless service community. The trainings are conducted by local experts.