Mountainland

Continuum of Care

Policies and Procedures

This document outlines key operational components of the
Continuum of Care, including policies and procedures for the CoC and
acts as the Mountainland CoC Governance Charter

Policy Version Updates		
Date of Update	**Date Originally Approved**	**Changes Made**
Annually prior to NOFA submission		**Project Review Criteria**
	December 2009	**Code of Ethics**
March 2016	**May 2011**	**CoC Priorities**
January 2014	**December 2012**	**Grievance/Appeal Policy**
January 2014	**January 2013**	**Education Assurance Policy**
	January 2014	**Initial draft of CoC Policies and Procedures and Governance Charter**
	January 2014	**Monitoring and Organizational Assessment Tool**
November 2015	**November 2015**	**Developing a Coordinated Entry and Assessment System that Follows *Opening Doors* Strategies**
November 2015	**November 2015**	**Accessing Mainstream Benefits Assurances**
November 2015		**Administering CoC and ESG Rapid Re-housing Assistance**
November 2015	**November 2015**	**Adoption of CPD-214-012**
November 2015		**Educational Assurances**
November 2015	**November 2015**	**Maintaining Family Unity Policy**
November 2015	**November 2015**	**Outreach Methodology**
November 2015	**November 2015**	**Prioritizing Veterans' Services**
September 2016	**September 2016**	**Reallocation policy**
September 2016	**September 2016**	**Early Childhood Education MOU**

Mountainland Continuum of Care

Policies and Procedures

Table of Contents

Contact Information:

United Way of Utah County is the Continuum of Care Lead Agency. Leadership of the CoC can be contacted by sending a message to:

Marie Schwitzer
CoC Administrative Assistant
maries@unitedwayuc.org

Policy and Procedure Maintenance: This will be considered a living document subject to change. Changes to this document will be made in response to changing conditions, regulations, and the will of the membership. Changes will be presented at the Mountainland Continuum of Care meeting time allowed, and adopted at the following meeting. In cases where time does not permit the Executive Committee may approve changes.

Introduction and purpose

This document outlines key operational components of the CoC, including policies and procedures for the CoC. This document serves as the Mountainland Continuum of Care Governance Charter.

Background

The Continuum of Care (C0C) is an approach that helps communities plan for and provide a full range of emergency, transitional, and permanent housing and supportive service resources to address the various needs of homeless persons. Homeless people have varying needs, and the Continuum of Care program provides a continuum of services that allows individuals to move from homelessness to permanent housing. Each year through the Continuum of Care process, eligible organizations have the opportunity to receive funding from the U.S. Department of Housing and Urban Development (HUD) to supplement and enhance housing and homeless programs in their area. HUD distributes these Congressionally-appropriated funds to help provide services to homeless individuals and families in high-need areas around the country. HUD also refers to the group of service providers and community members involved in the decision making processes as the ''Continuum of Care.''

The CoC is responsible for recommending organizations and projects to receive federal funding. Also, the CoC is required to have projects selected and prioritized by a Review Committee which is a subcommittee of the CoC. The Review committee determines which projects submitted by local service organizations will be presented to the CoC for final ranking and submission to HUD for funding consideration. Continuum of Care funding is intended to reduce incidents of homelessness in CoC communities, by assisting homeless individuals and families in quickly transitioning to self-sufficiency and permanent housing.

United Way of Utah County provides staff support for the CoC and has been designated as the Continuum's Consolidated Applicant. As such, United Way administers the Planning Project and Coordinated Intake and Assessment. United Way staff work in collaboration with the CoC Planner to carry out planning, coordination, monitoring, support of CoC Subcommittees, and other activities.

Mission and Vision

MISSION

The mission of the CoC is to develop and implement community- wide strategies and solutions to prevent and end homelessness. This is done by:

1. increasing public awareness,
2. advocating for homeless people,
3. coordinating services,
4. educating public, community providers, elected officials, and policy makers regarding homelessness and solutions,
5. identifying gaps using PIT, HIC, and community data,
6. targeting resources and implementing best practices.
7. supporting and collaborating on grant applications,
8. Seeking funding outside of the CoC process to meet community needs (public and private.)

VISION

The Mountainland CoC's vision is to end homelessness by providing decent, safe and affordable housing and effective support services to homeless, chronic homeless and near homeless families and individuals including – initial stabilization, transitional housing, permanent housing, access to mainstream resources and independence from governmental assistance. This vision emphasizes the complete cooperation, coordination and spirit of partnership of all housing organizations, faith-based organizations, service agencies as well as the private and public sector to efficiently utilize limited resources and to implement effective programs.

The service area for the Continuum of Care is comprised of Utah, Wasatch, and Summit Counties. The Continuum works closely with leaders and providers in Utah's other Continua to ensure that all homeless persons in need have access to services needed to end homelessness.

Nondiscrimination

The Continuum of Care is a non-discriminatory organization and does not discriminate on the basis of age, sex, race, ethnicity, religion, creed, disability, sexual orientation, familial status, or natural origin in accordance with all state and federal regulations.

Membership

1. Membership in the Mountainland Continuum of Care is broadly representative of agencies or organizations within Mountainland that provide or facilitate homeless services, community members, and consumers.
2. Each agency or organization will have only one voting representative and one alternate voting representative at any given time. These individuals will also serve as the official contact persons for the agency or organization that she/he represents. All members will recuse themselves from any CoC action or decision which may directly affect their agency or organization.
3. Outreach is made to ensure participation from the following groups:
   - Homeless service providers and agencies
   - Community and faith-based organizations
   - Nonprofit housing developers
   - Local government representatives (city and county)
   - Key civic leaders
   - Homeless and formerly homeless persons
   - Homeless advocates
   - Public housing authorities
   - Private health care organizations
   - Mental health service providers
   - State workforce services and eligibility for federal resources
   - Veteran service agencies
   - Colleges and universities
   - Substance abuse service providers
   - Business and business associations
   - Key members of local planning groups
   - Political leaders/elected officials
   - Law enforcement and corrections agencies
   - School districts.
4. Prospective members may attend meetings as non-voting members before they are nominated.
5. New member agencies, organizations or persons must be approved by a simple majority vote of the current membership.
6. Once membership of the agency or organization has been approved, a representative and alternate representative will be designated by the agency or organization as voting representatives.
7. The CoC administrative assistant will maintain an official list of member agencies or organizations and their designated representatives and alternate representatives.

Meetings and Communication

1. Generally, a minimum of ten (10) member meetings will be held each year, on the second Monday of each month.
2. All the meetings of the members of the CoC shall be open to the public. Meetings other than member meetings, including meetings of the Executive Committee, are not open to the public.
3. The Executive Committee may call special member meetings by providing an agenda to all the members at least seven days prior to such meeting.

4. A quorum of the membership shall exist if a majority of the total members are present in person or electronically.
5. The CoC administrative assistant shall take reasonable steps to insure that all members are notified of the time and place of all member meetings. Meeting agendas will be distributed electronically prior to the meetings.
6. A reasonable period of time shall be set aside for members to address the CoC at the member meetings.
7. All CoC members shall be permitted to propose "new business" for the next member meeting of the Corporation.
8. The annual member meeting of the CoC shall be set by the Executive Committee who shall also set the time and location of the meeting.
9. It is recommended that one annual strategic planning session be held each year.
10. All procedural matters for member meetings not governed by these bylaws, shall follow the provisions of Robert's Rule of Order.
11. The CoC may, by a vote of the majority of the members of the CoC present at a meeting, suspend any provision of Robert's Rules, at any time, whether or not suspension is on the agenda.
12. Motions at member meetings can only be made by voting representatives.
13. Minutes of the CoC meetings will be presented for approval and will be posted on the CoC website.

Between CoC meetings, the leadership and staff of the CoC will keep members involved using some or all of the following methods:

- Maintaining a directory of CoC members, as well as updating and placing it on the CoC website
- Establishing working groups to move the work of the CoC forward between meetings
- Encouraging partners with similar interests to join forces, either by sharing information/best practices or working on strategies to collaborate and support each other's efforts
- Sharing information regularly to maintain a focus on ending homelessness in general and the continuum in particular

Methods of sharing information between CoC meetings will include:

- Information sent out via email
- Information shared in a monthly electronic CoC newsletter
- Information added to the CoC website, including:
    o Information on the work of the Continuum
    o Resources
    o Plans and Implementation
    o Research and data
    o Funding availability, grant application and awards
    o Written agendas and minutes from meetings
    o Policies

Executive Committee Selection

- The Executive Committee shall consist of not less than three voting CoC members. In addition, the chair and co-chair of the Continuum of Care Committee and the CoC Planner, shall automatically be ex officio members of the Executive Committee. As members resign, the executive committee will appoint an interim member to the position until the next annual member meeting is conducted and a formal vote and approval process can take place.
- This process will be reviewed, updated, and approved by the Continuum annually with the approval of the CoC Policies and Procedures.

Code of Ethics/Conflict of Interest

Originally Adopted December 2009

The Mountainland Continuum of Care is responsible to its stakeholders that include affiliates, members, donors, funders, and others who have placed faith in our mission, support our goals and work on behalf and with people who are experiencing homelessness in Utah, Wasatch, and Summit Counties. A copy of the Code of Ethics will be distributed to all members of the Council and available on the CoC website

As members of the Mountainland Region Continuum of Care, we affirm the following core values:

- Integrity. Our organizations' activities, services, and programs are consistent with our stated missions, compatible with our organizational capacity, respectful of the interests of our varied constituencies, and managed with the highest level of professionalism.

- Respect and Dignity. We respect the dignity and autonomy of each person, and the integrity, privacy, pride, beliefs, and cultures of our varied constituencies—the people we serve, our employees, donors, volunteers, and others. Policies that govern our working relationships with these constituencies (e.g., client confidentiality, fair process) reflect this commitment.

- Good Citizenship. We comply with all applicable federal, state, and local laws and regulations. We keep the broader interests of the community in mind even as we advance our own specific interests, and look for opportunities to become partners with those working in the private and public sectors. We value respectful, reasoned dialogue with one another when we disagree.

- Care and Loyalty. As organizations we enable our individual board members to exercise their duties of care and loyalty. Individual board members are reasonably informed and participate in board decisions in good faith. They do not use their position for individual personal advantage.

- Truth-telling and Openness. We provide truthful information about our missions, program activities, use of donations, and finances. We are accessible and responsive to members of the public who express an interest in the affairs of our organizations.

- Accountability. The true measure of our success as nonprofits is whether individual lives—and our communities—change for the better as a result of our work. Being mission-focused, producing measurable outcomes, conducting program evaluations, and developing and maintaining sound financial management are important elements of our accountability.

- Stewardship. We are able to accomplish our missions through the generosity of others. We respect funders' and donors' intentions and restrictions on the use of their funds, and promote responsible stewardship of the resources they entrust to us for the accomplishment of our work.

- Excellence. We support and encourage visionary governance, exemplary management, excellent service and program delivery, and exceptional staff. We value and uphold the highest ethical and professional standards in all working relations.

Conflict of Interest

• As members of the CoC, we will avoid any conflict of interest or appearance of a conflict of interest.

• We will avoid any activity with vendors, grantees, or others that would compromise decisions or the ability to effectively carry out the duties for which we are responsible or that would conflict with the best interest of the CoC.

• All gifts, favors, fees or honoraria will be declared except for promotional items or items of nominal value.

• We will avoid influencing the selection of staff, consultants and vendors solely on the basis of a personal relationship.

• Violation of standards by officers, employees or agents of the CoC may result in disciplinary action up to and including termination or removal from the CoC.

Committees

The CoC will establish subcommittees as needed to carry out the mission and purposes of the CoC. Other than the Executive Committee, each subcommittee shall choose their own chairperson, determine their meeting schedule, and report their work in the CoC regular meetings.

- An Executive Committee will be established to provide oversight for the CoC. (See Executive Committee).

- A Discharge Planning Subcommittee will be established to identify and address issues related to discharging persons from jail, hospitals, mental health care, foster care, substance abuse facilities, corrections, etc. This subcommittee will consist of voting members of the CoC and other community members.

- A Review and Ranking Subcommittee will be established. This subcommittee will be made up of individuals in the community who have interest in the Continuum of Care process but are not an applicant for the funding cycle of HUD's NOFA. This committee will utilize CoC established criteria to thoroughly review and score applications to assure accurate strong applications in response to identified community and HUD gaps and needs. The subcommittee will have an appointed Chair under the direction of the CoC.

- A Community Relations Subcommittee will be established to develop and implement a variety of strategies and activities to increase public awareness; advocate for homeless people; educate public, community providers, elected officials, policy makers, and others about homelessness; and to assist service providers in reaching out to homeless persons and families. Membership will come from the CoC and may be expanded to include other community members.

- A Coordinated Supportive Services Committee will be established: to coordinate services; to support individual agencies in reaching project goals and HUD and CoC established performance goals; to assist projects in increasing their capacity to carry out activities to best serve their homeless clients; to establish and implement a region-wide coordinated intake and assessment system; to research and share best practices; and to organize and hold regular training for front-line staff regarding services and resources. The Subcommittee is also charged to work with service providers to ensure that family unity is maintained when homeless households with children under the age of 18 enter homeless shelters or housing. The Subcommittee will also work with service providers on developing policies and procedures to maintain family unity. The subcommittee will consist of at least one front-line staff person from each of the housing and homeless service providers in the CoC's geographic area, the lead person implementing the Coordinated Intake and Assessment System (United Way), and the CoC Planner. They meet bi-weekly to review the Continuum's by-name list of most vulnerable clients.

- A Housing Project Subcommittee will be established to carry out strategies and activities intended to increase the availability of housing to meet the housing needs of homeless persons. The members will be key staff members of nonprofit housing developers and housing providers (housing authorities, RRH programs, private developers, etc.) The subcommittee will work to assist the CoC in fulfilling their commitment to "housing first," to ending chronic, family, youth, and veteran homelessness; and to increase the number of housing units/beds to meet the needs of targeted subpopulations.

- An Education Subcommittee will be established to help ensure that homeless children and youth have access to McKinney-Vento educational services, are enrolled in school, and are accessing other needed services.   The members of the Subcommittee will include: homeless service providers, school district liaisons for homeless services, Head Start, and others. The members will coordinate services to families and children, ensure service providers are familiar with services, and ensure parents are informed of their rights. A HOME Planning Subcommittee will be established to meet annually to support agencies in seeking HOME funding to increase the availability of housing to end homelessness and to prevent homelessness.

Ad Hoc Committees will be established as needed, by the CoC.

Priorities

The CoC is committed to addressing HUD and community priorities. In general, it is the policy of the CoC to collaborate with service providers to further the achievement of HUD's goals as articulated in HUD's Strategic Plan and the *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*.

HUD's goals and guidance include:

* *Housing First* is a proven effective housing model to ending chronic homelessness;
* Creating new dedicated PSH beds;
* Achieving housing stability;
* Assisting program participants to increase income to ensure housing stability and decrease the potential of returning to homelessness;
* Assisting program participants to obtain mainstream benefits
* To ensure housing stability and decrease potential of returning to homelessness;
* Rapid re-housing is a proven effective housing model especially for households with children.

Mountainland Continuum of Care priorities developed from an in-depth online survey of CoC members conducted in 2016.

The following is the summary chart of the CoC local priorities as of April 2016

Service type	Score	Tier
Permanent Supportive Housing	0.2105	1
Affordable Housing for Family	0.1485	2
Emergency Shelter	0.1431	2
Emergency Domestic Violence Shelter	0.1418	2
Afford Housing for Singles	0.1329	2
Affordable Housing for Persons with Disabilities	0.1221	2
Transitional Housing	0.1011	3
Home Ownership	0.0000	3

Demographic Group	Score	Tier
Chronically Homeless Families	0.192	1
Families	0.166	1
Persons with Mental Illness	0.162	1
Chronically Homeless Singles	0.142	2
Unemployed	0.118	3
Victims of Domestic Violence	0.110	3
Persons with HIV/AIDS	0.061	4
Adult	0.049	4

Coordinated Intake and Assessment

Mountainland Continuum of Care geographically incorporates Utah, Wasatch, and Summit Counties within the State of Utah. The Mountainland Continuum of Care is involved in the development of a statewide coordinated intake and assessment system.

The Mountainland CoC has been operating under a coordinated system of entry for many years. Homeless and housing service providers have worked closely together to coordinate resources, and to appropriately serve homeless persons. With the implementation of a statewide HMIS system in 2007, most homeless service providers began using common intake and assessment tools.

When in a housing crisis, a consumer may enter the coordinated system by calling or visiting 211 or any homeless or housing service provider participating in HMIS. The system is designed to ensure that every access point can serve as an entry to the system, with no wrong door.

Upon entry, each consumer will be assessed for services through the standardized assessment called the VI-SPDAT. The assessment will determine whether the consumer can be diverted from shelter and slated for prevention services or whether a referral to an emergency shelter or domestic violence shelter is needed. Once the referral destination is identified, the consumer will be provided information regarding the referral and the referral source will be notified of the impending referral via HMIS notification. Upon arrival at the referral destination, the consumer will be enrolled in services using the Standardized Intake form utilized by all participating agencies within the CoC. This form collects all Universal Data Elements and program specific elements to determine if the consumer is defined as a special population for whom housing options exist. If a client scores high on this assessment, it is recommended they engage in a more in-depth tool called the SPDAT.

Developing a Coordinated Entry System that Follows *Opening Doors* Strategies

The Mountainland Continuum of Care coordinated entry and assessment process follows the characteristics outlined by HUD'S Opening Doors strategy. Assessment tools and processes are used across both Mountainland and Balance of State CoCs.

- Prioritization, referrals, and outreach. Clients are prioritized by vulnerability, which is determined by standardized assessments. These are the VI-SPDAT, a prescreening triage tool, and the SPDAT, an in-depth tool that helps case managers assess specific resources for the client. Clients who lack permanent housing and receive high scores on standardized assessments are reviewed by name on a biweekly basis by a subcommittee called "Coordinated Support Services." Each direct-service agency within a county area provides one representative to meet with this group. These representatives typically include lead case managers from public housing authorities, non-profits that lead street outreach (this team surveys the area several times a week), veterans, and family services, a CIT trained officer from the local police department. An MOU discussing confidentiality and purposes of the committee was agreed to and signed by executives of each agency. This group is established in Utah County and is being generated in Summit County. Outreach has been made to Wasatch County.

  An aggregate report of unplaced, assessed clients within the Continuum jurisdiction is exported from the HMIS database by the HMIS lead (the Assistant Planner). Client information is sorted by SPDAT score, chronic homeless status, VI-SPDAT score, veteran status, and family status. This export list is referred to as the "by-name" list, which the committee reviews, discusses, and updates client by client. In this process, clients with the highest vulnerability scores on the SPDAT assessment with a chronic homeless status are discussed first, with information necessary to create referrals, to assess fit with current vacancies in the area, as well as the clients' desire to receive housing services. All eligible referrals are accepted. Subpopulations such as families with children, victims of domestic violence, and veterans are referred to agencies that can offer the most direct services for their needs.

  It is recommended that clients that score an 8 or above on the VI-SPDAT assessment to receive the SPDAT assessment. As suggested in the broader BoS-MTL Coordinated Entry and Assessment Policies and Procedures, clients with a scores of 40 or above on the SPDAT are recommended for permanent supportive housing services. Clients with scores between 4 and 7 on the VI-SPDAT or 20 and 39 on the SPDAT may receive rapid rehousing services and or other forms of housing assistance. Clients with scores lower than 3 on the VI-SPDAT or 20 on the SPDAT are considered capable of self-resolving their housing situation and should be diverted to mainstream services.

- Low Barrier. As suggested by HUD, "coordinated entry and placement processes do not screen people out for assistance because of perceived barriers to housing or services, including but not limited to income or employment, drug or alcohol use, or a criminal record." In most projects, clients are not required to participate in services, although agencies will continually attempt to engage with clients if it is perceived that support is needed. Federal law and local ordinances do not permit individuals with particular offences to be housed in public housing (e.g., sex offenders or the manufacturing and production of methamphetamine). In other cases, agencies attempt to provide housing opportunities that are lenient with findings on an individual's background check. Landlords that are wary of checkered backgrounds can be insured with additional financial insurance through a private community-based flex fund (the Utah County Housing First Fund) to mitigate risk of damages to their property.

- Housing First orientation. HUD states that "the coordinated entry process is Housing First oriented, such that people are housed quickly without preconditions or service participation requirements." Participants that score high on our standardized vulnerability indexes are prioritized and recommended for permanent supportive housing programs within the Continuum that operate with a Housing First approach and reflect low barrier policies. Non-CoC funded programs may require more restrictive requirements within their service models, and the most vulnerable clients are not typically recommended for these settings.

- Person-Centered. As mentioned above, service providers (public housing authorities, local non-profit organization representatives, etc.) systematically and continuously inform each other of vacancy opportunities for prioritized clients. These placement options are recommended to clients, and if the client consents to one or several of them, case managers advocate on behalf of the client to help them obtain a lease in their name. If the client refuses these opportunities, case managers continue to find the most amenable option for him or her with service providers on a biweekly basis.

- Fair and Equal access. HUD mentions the importance for "all people in the CoC's geographic area have fair and equal access to the coordinated entry process, regardless of where or how they present for services." The Mountainland CoC has centralized services in major cities in each the counties it serves, but any client can call the 24 hour 2-1-1 resource line to access information about agencies that participate in coordinated entry services. A local 2-1-1 central contact for housing services is available when agencies phone numbers are busy. This contact directs clients to the most direct services that meets their resource needs. However, at this time, only service agencies can do a formal intake process with the VI-SPDAT and SPDAT assessments. 2-1-1 outreach employees and service providers all strive to employ someone on staff that speaks Spanish, a dominant language used in the area. When other language services are required, agencies can contact the Refugee and Immigrant Center in Salt Lake City, Utah.

- Emergency services. We do not have an emergency shelter placed in our CoC. When funding is available, especially for families with children, clients can be put into motels for a limited amount of time with a voucher, whether or not a full assessment is completed. When this shelter is unavailable, clients are diverted to family or friends, or to shelters in Salt Lake City.

- Standardized access and assessment. Prioritization of placement within the Mountainland Continuum of Care starts with a standardized process of coordinated intake (entry) across agencies that is recorded in Clientrack, the State's HMIS system. Each agency attempts to complete a VI-SPDAT (The Vulnerability Index - Service Prioritization Decision Assistance Tool) assessment with clients. This is a triage tool used to justify services and to assess if the client needs further screening. If so, a SPDAT (Service Prioritization Decision Assistance Tool) assessment is attempted with the client, which is an in-depth tool meant to evaluate specific services and appropriate placement needed for the individual. This data is inputed into the HMIS (Homeless Management Information System) database, a statewide tool used to track clients' progress with service providers.

- Inclusive. Standardized assessments are inclusive for all subpopulations, including families. The F-VI-SPDAT and the F-SPDAT are tools used to score adults with children, and each of these have service recommendations based on scoring. Case managers working with clients with disabilities should attempt to use the prescreening tool, but may by-pass this process if the finds the questions too cumbersome or difficult. Case managers can then progress to the full SPDAT assessment for resource help. Recently, service providers for domestic violence victims were also able to receive clearance to participate in HMIS with their own input procedures that are in compliance with VAWA.

- Ongoing planning and stakeholder consultation. Feedback about assessment tools and processes for coordinated entry are solicited bi-annually. CoC administrators implement feedback in the overall policy, and changes are taken to the broader CoC for vote at least annually. HMIS data can also inform local planning if it is reported as aggregate data.

- Safety planning. VAWA policies are respected within the coordinated entry and assessment process. Domestic violence victims are not identified by name in bi-weekly meetings and domestic violence case managers ask questions that are general in nature to seek out vacancies and resource for clients. DV service providers now have an ability to access HMIS with a codified system that does not identify clients by personal information.

- Using HMIS and other systems for coordinated entry. All assessments are recorded in HMIS, and the by-name list is created through an HMIS report.

- Full coverage. Utah and Summit counties have full access to the coordinated entry process, and select service providers also cover the Wasatch county area.

- Data quality. Within the MCoC jurisdiction, high data quality within the by-name list is a high priority. Case managers at all agencies are trained by the State HMIS staff to update clients' statuses, services, and assessments within seven days. However, some clients still have names that lack a sufficient status update, which can be modified by the CSS committee. When names are reviewed every two weeks, clients with status of six months or older are flagged by the HMIS lead (the Assistant Planner). CSS committee members are allowed one calendar week to review these flagged names before they are reviewed by the entire committee. When a client has a status update older than six months or longer and has not been seen by any member of the CSS committee for six months, their status will be changed to "disappeared" in HMIS. When clients have a status update older than six months or longer and is not recognized by anyone on the CSS committee, his or her status will be listed as "inactive" in HMIS. This process will ensure that valuable time is spent on clients that are currently within our reach.

Prevention and Diversion

With HPRP funding, the 2 funders (Provo City and The State of Utah) collaborated in their funding award decisions and awarded funding to a single agency for prevention (Community Action Services and Food Bank in Provo). Community Action Services and Food Bank (CASFB) was an established agency in the Mountainland region that had been the primary source for prevention services in Utah, Wasatch, and Summit Counties, including rental assistance, landlord mediation and eviction avoidance. CASFB participates in HMIS and utilizes the common intake and assessments for all UHMIS participants. If the consumer is deemed an appropriate candidate for prevention funds, a referral will be made to CASFB.

Project Review Policies and Procedures

Eligible proposals will be prioritized for inclusion in the CoC's coordinated application by the Review Subcommittee acting as the review and rating group. Applications not scoring high enough and not meeting the threshold requirements will not be placed on the project funding request as part of the Consolidated Application (Formerly Exhibit 1). These policies and procedures are updated on an annual basis following the release of the HUD NOFA.

This subcommittee will be made up of individuals in the community who have interest in the Continuum of Care process but are not an applicant for the funding cycle of HUD's SuperNOFA. This subcommittee will utilize CoC established criteria to thoroughly review and score applications to assure accurate strong applications in response to identified community and HUD gaps and needs. The subcommittee will have an appointed Chair under the direction of the CoC.

- Review Subcommittee members must declare that they have no conflict of interest.
- Members must be appointed every year.
- Members must be able to dedicate time for application review and committee meetings.
- Review Subcommittee members (3-5) are given: information pertinent to the CoC; role of the Review Subcommittee; review of the scoring tools, applications, and resources
- Review Subcommittee members review eligible application proposals and scoring materials. CoC administrative staff prepares a summary for each project application to assist the subcommittee in their work.
- Prior to the review and rating meeting, members prepare and note any questions/comments.
- If the CoC staff have any knowledge that could lead HUD to deny granting funds to a project, they will share that information with the Review Subcommittee. CoC staff will discuss this information with applicants as part of technical assistance provided to assist project development.
- The Review Subcommittee meets to review and discuss each application together and to individually score them. CoC staff is present at the Subcommittee meeting to record decisions of the Subcommittee and any comments/ recommendations they have for applicants.
  - o The Review Subcommittee discusses the merits of each proposal, and rates the applications.
  - o Overall raw scores are recorded by CoC Staff.
  - o The Subcommittee considers adjustments for such issues HUD incentives or requirements, and project findings.
  - o The Subcommittee considers proposal changes or project budget adjustments that may be required to meet community needs.
  - o The Subcommittee determines the rank and funding levels of all projects considering all available information.
  - o During deliberation, CoC staff will provide technical assistance by responding to questions of the Subcommittee members, correcting technical inaccuracies if they arise in conversation, and reminding the Subcommittee members of their responsibilities if they step outside their purview.
- Scoring results are delivered to applicants with a reminder about the appellate process.
- Each applicant receives feedback on their proposals on technical issues and changes needed by CoC staff. Applicants are asked to correct their applications and send them back to CoC staff before final submission to HUD.
- Applications which do not meet the threshold requirements will not be included in the Priority Listing in the Consolidated Application, and therefore will not be forwarded to HUD for consideration.
- If more applications are submitted than the CoC has money to fund, the lowest-scoring applications will not be included in the Priority List in Exhibit 1, and therefore will not be forwarded to HUD for consideration.
- The Subcommittee may reallocate funds in whole or in part from projects in order to create new projects that would improve Continuum system performance (for more details, see "Policy for Reallocation").

Policy for Reallocation

Reallocation is when a CoC shifts funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's Annual Renewal Demand (ARD). New projects created through reallocation must meet the requirements outlined in the annual NOFA. In FY2016, eligible new projects for reallocation only included a. New permanent supportive housing for people experiencing chronic homelessness (singles and

families); b. Rapid re-housing to serve homeless households (singles and families); c. HMIS expansion; d. SSO for a centralized or coordinated assessment system.

The Rank and Review committee may review funds from renewal projects for reallocation if renewal projects have:
- *Low utilization rates*
- *A history of returning high percentages of project funds (more than 10%) to HUD*
- *A history of serving ineligible clients*
- *Underperformed on APR goals without reasonable cause (indicated in monitoring reports)*
- *Continue to manage project models that are low priority for the CoC and/or HUD*

Renewal project applicants who have a portion of their proposed budget decreased or rejected by the CoC will receive notification by letter from the CoC. Rejected projects will be notified at least 15 days before the final submission of the Consolidated Application.

Policy for Appeals of Rating/Ranking
Eligible Appeals

- The application of any applicant agency which a) is unranked, or b) receives decreased funding (e.g. projects receiving reallocated renewal funds) may appeal.
- Applicants that have been found not to meet the threshold requirements are not eligible for an appeal.
- Appeals cannot be based upon the judgment of the Review Subcommittee.

Applicants may appeal if they can:

- Prove their score is not reflective of the application information provided; or
- Describe bias or unfairness in the process, which warrants the appeal.

All notices of appeal must be based on the information submitted by the application due date. No new or additional information will be considered. Omissions to the application cannot be appealed.

Per 24 CFR 578.35(b), project applicants that believe they were not allowed to participate in a fair and open process and that were rejected by the CoC may appeal the rejection directly to HUD by submitting as a Solo Application prior to the application deadline.

Grievance
Originally adopted December 17, 2012

The Grievance process outlined below is a statement to eligible organizations and the community that the Mountainland Continuum of Care Committee is committed to fairness and openness in the CoC funding process. The Department of Housing and Urban Development does not mandate any particular grievance process, but has determined that it is the responsibility of the Continuum of Care to establish a grievance process that is available and timely. The Department of Housing and Urban Development determines the amount of the Continuum of Care Program allocation available to the Mountainland Region, the program and services eligibility, the minimum requirements for renewal projects and the minimum requirements for new projects.

If it is determined that the Executive Committee of the CoC cannot make a fair and unbiased recommendation regarding any grievance, the Executive Committee of the United Way of Utah County will be asked to participate/assist. The grievance process procedures here submitted are available to individuals, agencies, and the general public upon request. Any organization or agency wishing to appeal funding decisions must submit notice of the appeal, signed by the chief volunteer officer of the organization making the appeal, within 10 days of the decision.

The first appeal should be made to the chair of the CoC who will then notify all CoC members that an appeal has been made. The CoC Executive Committee will convene immediately, within 10 working days of receipt of the written appeal, to consider the merit of the appeal. In the case of an appeal which provides previously unavailable

information or the correction of erroneous information, notification of a decision concerning the appeal will be provided within 10 days of receipt of the appeal.

In the case of appeals for the purpose of contesting alleged prejudice, violation of law or HUD or local CoC guidelines, fraud, or misuse of federal funds, the CoC Executive Committee may appoint an independent appeals committee composed of impartial Utah County officials and service providers. This group will review the information produced in the appeal and reach a decision concerning the merit of the appeal within 20 days of the receipt of the appeal. All appeal decisions will be final.

HMIS

The State of Utah Homeless Management Information System (UHMIS) is a collaborative project of three Continuum of Care within the State of Utah, namely Mountainland, Balance of State, and Salt Lake/Tooele, and the State Community Service Office (SCSO), Housing and Community Development Division of the State of Utah Department of Workforce Services (DWS), and participating Partner Agencies. HMIS is a computerized data collection application designed to capture information about homeless people and homeless programs over time. HMIS is mandated by the U.S. Department of Housing and Urban Development (HUD) under the HEARTH Act for all communities and agencies receiving HUD Continuum of Care (CoC) and Emergency Solutions Grant (ESG) homeless assistance funds. HMIS is essential to efforts to streamline client services and inform public policy. Through HMIS, homeless people benefit from improved coordination in and between agencies, informed advocacy efforts, and policies that result in targeted services. Analysis of information gathered through HMIS is critical to the preparation of a periodic accounting of homelessness in the State of Utah and each Continuum, which may include measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs. Such an unduplicated accounting of homelessness is necessary to service and systems planning, effective resource allocation, and advocacy. The parties to this Memorandum Of Understanding (MOU) share a common interest in collaborating to end homelessness and successfully implementing and operating HMIS in the State of Utah.

The Mountainland Continuum of Care goal is to collaboratively provide a range of homeless housing and services. The continuum of care system components includes prevention, emergency shelter, transitional housing, permanent housing and permanent supportive housing. Outreach efforts and specialized supportive services, actively identify and support homeless individuals and families and work with them to access mainstream resources. HMIS will enable homeless service providers to collect uniform client information over time. Analysis of information gathered through HMIS is critical to accurately calculate the size, characteristics, and needs of the homeless population; these data are necessary to service and systems planning, and advocacy.

HMIS Governance

The State of Utah CoC's are the lead planning groups of the HUD funded efforts to end homelessness and for implementing and operating a homeless System within their jurisdictions. A Memorandum of Understanding outlines in detail the expectations for each of the three continua and the State of Utah. Per HUD policy the CoC's are responsible for HMIS project oversight and implementation, which encompasses

a) planning,
b) administration,
c) HMIS budget approval and oversight,
d) grant monitoring and work plan submission approval,
e) software selection,
f) managing of HMIS data compliance with HMIS data standards,
g) reviewing and approving all policies, procedures and data management plans contributing to HMIS Organizations

The CoC's oversight and governance responsibilities are carried out by its Steering Committee. The general decision making process is as follows:

a) Draft policies, procedures, data management plans and other work will be reviewed, amended, and preliminarily approved by the Steering Committee.

b) The CoC representatives on the Steering Committee are responsible to share draft policies, procedures, data management plans and other work with their perspective CoCs for CoC feedback and approval.

c) The Steering Committee may give final approval of policies, procedures, data management plans and other work after receiving feedback and approval from each of the three CoCs.

d) No policy, procedure, data management plan or other work may be approved by the Steering Committee without confirmation and approval by all three CoCs.

A joint, extensive policy guide has been developed between the Moutainland CoC and the Balance of State CoCs within standardized coordinated entry practices within HMIS. Recommendations in this policy inform how services can be directed to clients based on assessment scores.

HMIS Steering Committee & Information Committee

The State HMIS Steering Committee is made up of representation of all three CoC's for the State of Utah as well as ESG representation, local leaders and the Lead Agency HMIS staff. The role and responsibility of the Steering Committee is defined in the Governance in section C.1.

The role and responsibility of the Information Committee is to provide analysis of trends and performance of the homeless system and detailed HMIS data reports as requested by each CoC objectives. This Committee will inform the Steering Committee and the SHCC of homeless data which may be collected outside of the HMIS system.

Lead Agency Designation

The three CoC's designated the State Community Services Office (SCSO), Housing and Community Development Division of the State of Utah Department of Workforce Services (DWS) to manage the HMIS operations on its behalf and to provide HMIS project administration functions including staffing with State employees and managing budget and grant requirements.

Point in Time Count

The Mountainland CoC conducts at least one point-in-time count of homeless persons per year. This count collects data on where homeless households are sleeping, household size, disability, and chronicity of homelessness.
HUD requires that all states with federally-funded homeless services participate in PIT during the last part of January each year. The PIT count is a physical count or census of all homeless persons living in emergency shelters, transitional housing, and on the streets on a single night. It does not capture those who experience only brief episodes of homelessness or account for changes throughout the year due to economic and social forces and therefore estimates are generated to estimate the total number of persons experiencing homelessness in a given year, called an "Annualized Count".

Utah has a single HMIS that collects information on homeless persons served, such as their characteristics and circumstances and the services they receive. The Utah HMIS covers around 80% of homeless service providers statewide.

Criteria and Decision-making Process for excluding Geographic Areas from Point in Time Count

The Ad Hoc Point in Time Subcommittee is committed to carrying out a process to provide counts of sheltered and unsheltered people experiencing homelessness on a single night in our three county region. Counts are provided by

household type (individuals, families, and child-only households), and are further broken down by subpopulation categories, such as homeless veterans and people who are chronically homeless.

The Subcommittee is also committed to making the most effective use of staff, volunteers, and other resources in the unsheltered count. Therefore the Subcommittee has used the following criteria and decision-making process to identify where the unsheltered count should be carried out and what specific geographic areas should be excluded from the unsheltered count. The CoC Assistant Planner leads the effort to carry out the unsheltered count. Several years ago the Subcommittee acquired maps of each of the three counties that includes cities, towns, streets, highways, roads, and topography. The three county area encompasses 5,000 square miles and includes a large lake, two reservoirs, high mountains, mountain valleys, a resort town, and two interstate highways. Our region is considered rural, urban and suburban.

The Subcommittee utilized the knowledge of the street outreach team as well as law enforcement, city parks and recreation personnel, case managers, soup kitchen staff as well as knowledge gained through conversations with persons living on the streets to map out locations which are potentially frequented by individuals and families who are homeless. The maps were used to parcel out different sectors on the maps throughout the three county region which would then be checked by teams of 2 to 4 persons. The count is carried out between 4 am and 6 am.

The following criteria is used to exclude specific geographic areas from the unsheltered count. Those areas which are excluded may exhibit one or more of these criteria.   The Subcommittee members were in agreement that it is highly unlikely for persons who are homeless to be present in any of these locations because there are no amenities, water, shelter, (i.e. generally uninhabitable) and are far from typical transportation systems.

1. Areas that are inaccessible by vehicles or people;
2. Remote west desert area;
3. The Wasatch Mountain range and high mountain passes;
4. Those areas (mountains and desert) that are only frequented for recreational purposes and which are many miles from any community;
5. Isolated grazing land (cattle and/or sheep); and/or
6. Isolated river ways.

Housing Inventory Chart

Every year the CoC will collect data to complete a housing inventory. This inventory will occur at a single point-in-time in the last ten days in January. The date of the housing inventory will be the same date as the point-in-time sheltered and unsheltered count.

For each program that houses persons experiencing homelessness, the CoC will collect data on:

- The number of beds and units currently serving individuals and families
- The number of beds and units created in the past year ("new inventory")
- The number of beds and units that are fully funded but not yet serving homeless people ("under development")

Housing inventory data must be obtained from all emergency shelters, transitional housing, and permanent supportive housing programs in the CoC, including those programs that do not receive HUD funding. Data collected from permanent supportive housing programs will be focused only on the beds and units that are dedicated to housing persons who are formerly homeless. The number of vacant emergency shelter, transitional housing, and permanent supportive housing units must be collected for the unmet need determination.

To collect Housing Inventory data, the CoC will annually:

• Use HMIS data to complete the Housing Inventory Chart OR

• Conduct a housing inventory survey (via mail, fax, e-mail, web-based, phone or on-site) of homeless providers, which will include the previous year's Housing Inventory Chart and instruct providers to review and update housing inventory information on the specified night of the housing inventory If the CoC decides to collect housing inventory information via a survey, the CoC will:

    o   Provide written instructions to all homeless providers on how to report an accurate bed inventory

    o   Systematically train provider-level staff on how to obtain an accurate bed inventory

    o   Include definitions of key terms used in the inventory chart

    o   Follow-up with providers (e.g., via telephone, email, or in-person) to ensure the maximum possible response rate and accuracy of the housing inventory information

    o   After receiving the inventory information, confirm the information with each provider to verify the accuracy of the data

Unmet need

Annually, the CoC reviews the data collected as a result of the homeless counts and housing/services inventories, and determine what housing and services are needed given the homeless populations. The methods to undertake this review include:

• Determining Housing Needs
• Calculating Unmet Needs
• Prioritizing Gaps

Each year the CoC reports to HUD what housing for homeless people are needed in the community, including the need of families and individuals for Emergency Shelter beds, Transitional Housing beds, and Permanent Supportive Housing beds. This information is also necessary for the long-term program and strategic planning. HUD's standardized methodology for calculating unmet need uses point-in-time data and local provider expertise to calculate an initial estimate of unmet need. Because the estimates from the standardized methodology may not reflect all that is known about the homeless population in our community, the CoC will also convene key community stakeholders to discuss the initial estimates and determine if adjustments are necessary to reflect other local information. The CoC will seek assistance from the State Community Services Office to lead a special work session wherein key agencies, service providers, and others are convened to establish the annual unmet need.

Determining Housing Needs
Unmet need reflects the difference between a CoC's bed capacity and the number of homeless persons in the CoC at one point-in-time. Thus, most information for the unmet need calculation is collected as part of the point-in-time homeless count and housing inventory process, except the housing needs of the community. To determine the housing needs of homeless persons who are residing in emergency shelter, transitional housing, and persons who are unsheltered, the CoC will gather expert opinions of homeless assistance providers.

The CoC will obtain the housing needs of sheltered homeless persons by asking each emergency shelter and transitional housing provider listed in the Housing Inventory Charts to estimate the percentage of their clients that need emergency shelter, transitional housing, and permanent housing to ultimately resolve their homeless situation.

The CoC will obtain the housing needs of unsheltered homeless persons by engaging the Wasatch Mental Health outreach team lead in a special meeting and through the completion of the 100K Homes Vulnerability Index/SPDAT with unsheltered persons during the PIT/Registry Week process.

When determining housing needs, the CoC will remember that:
• Each person or family should be placed in the one program type that will best assist the household in resolving homelessness
• The calculation of unmet need for each program type (emergency shelter, transitional housing, or permanent supportive housing) should be done separately for unaccompanied individuals and persons in families with children; this is necessary to accurately reflect the bed capacity needs for each group.

Calculating Unmet Need
The CoC will begin by using the following standardized formulas for calculating unmet need by program type (emergency shelter, transitional housing, and permanent supportive housing):

• Unmet need for Emergency Shelter (ES) = (The number of unsheltered homeless persons who need ES +the number of persons currently in ES who will only need ES) – (Total number of ES beds + ES beds under development)

• Unmet need for Transitional Housing (TH) = (The number of unsheltered homeless persons who need TH + the number of persons in ES who need TH + the number of persons in TH who will only need TH) - (Total number of TH beds + TH beds under development)

• Unmet need for Permanent Supportive Housing (PSH) = (The number of unsheltered homeless persons who need PSH + the number of persons in ES who need PSH + the number of persons in TH who need PSH) - (Total number of vacant PSH beds + PSH beds under development)

Accessing Mainstream Benefits Assurances

It is essential for homeless individuals and families to access mainstream benefits and programs and to receive assistance through those programs. The CoC is committed to providing CoC project staff members with the most current information available about mainstream benefits and programs so they may assist project participants to access these resources. This may be accomplished through announcements from key agencies at regular CoC meetings; announcements in the monthly CoC e-newsletter; orientations in CoC meetings and/or specific subcommittee meetings. The CoC holds two half-day trainings on mainstream programs every other year with participation of staff from CoC funded and non CoC funded homeless and housing services. The programs covered in these efforts include: state general assistance, Medicaid, Medicare, SNAP, Section 8 housing vouchers, WIC, community health programs, accessing state identification, public housing, etc.

Administering CoC and ESG Rapid Re-housing assistance

The CoC will develop and implement the following policies and procedures related to administering CoC sand ESG Rapid Re-Housing Assistance. The CoC will seek assistance and guidance from the Salt Lake/Tooele CoC, the State Community Services Office, and local RRH service providers in developing the policies and procedures.

In addition to those Rapid Re-housing policies found elsewhere in this policy and procedures manual, the Mountainland Continuum of Care urges individual agencies to utilize the attached addendum "*Rapid Re-Housing Best Practice and Written Standards*" as a point of reference in the development of program policy and procedures, developing new programs of this type and in the training of new staff.

POLICY AND PROCEDURES

1. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG and CoC RRH.
2. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.
3. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.
4. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.
5. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.
6. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.

Adoption of "Notice CPD-14-012: Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status"

In September 2014 the CoC presented CPD-14-012 in a CoC general meeting. There was consensus to commit as a CoC to the prioritization of PSH strategies to increase the number of PSH beds available for chronically homeless persons, to adopt the orders of priority and to use our CoC Coordinated Intake and Assessment process to determine eligibility and establish a prioritized waiting list.

In support of that decision, we propose the adoption of the following language for the CoC Policies and Procedures Manual.

Notice CPD-14-012
The CoC hereby commits to ensure that the homeless individuals and families with the most severe service needs within our community are prioritized in Permanent Supportive Housing, which will increase our progress of ending chronic homelessness.

We commit to increase our progress to ending chronic homelessness by increasing the number of CoC Program funded PSH beds that are dedicated to persons experiencing chronic homelessness and by prioritizing at least 85% of our non-dedicated PSH beds for use by persons experiencing chronic homelessness.

In order to ensure that all CoC Program-funded PSH beds are used most effectively, we hereby adopt and will incorporate into our coordinated intake and assessment the following order of priority:

- 1st Priority – Chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs.
- 2nd Priority – Chronically homeless individuals and families with the longest history of homelessness.
- 3rd Priority – Chronically homeless individuals and families with the most severe service needs.
- 4th Priority – All other chronically homeless individuals and families.

In order to ensure that all PSH beds not dedicated or prioritized for persons experiencing chronic homelessness, we hereby adopt and will incorporate into our coordinated intake and assessment the following order ot priority:

- 1st Priority – Homeless individuals and families with a disability with the most severe service needs.
- 2nd Priority – Homeless individuals and families with a disability with a long period of continuous or episodic homelessness.
- 3rd Priority – Homeless invididuals and families with disability coming from places not meant for human habitation, safe havens, or emergency shelters.
- 4th Priority – Homeless individuals and families with a disability coming form transitional housing.

Recipients of CoC Program-funded PSH should follow the order of priority above, as adopted by the CoC, while also considering the goals and any identified target populations served by the project.

The specific details for each of these priorities may be found in "Notice CPD-14-012: Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status".

AHAR Participation

The Annual Homeless Assessment Report (AHAR) is a report by HUD to the U.S. Congress on the extent and nature of homelessness in America. It is based on data from Homeless Management Information Systems and on information

from Continuum of Care (CoC) Collaborative Application. The AHAR provides estimates of the number of homeless persons nationally, a descriptive profile of homeless persons, and an analysis of service use patterns.

The HMIS team for the CoC is responsible for completing the AHAR. Client level data for the AHAR will be collected through the Homeless Management Information System (HMIS) based on HUD's universal data elements which all communities receiving HUD Homeless Assistance funding are required to collect and maintain and which are the same data elements used to generate HUD's Annual Performance Reports (APRs).

Unduplicated data will be collected for the four standard AHAR reporting categories: Emergency Shelter-Individuals, Emergency Shelter-Families, Transitional Housing-Individuals and Transitional Housing-Families. Data will also be collected for any supplemental reporting categories established by HUD. In order to participate in the AHAR, the CoC's HMIS must be capable of:

- Producing a one day point-in-time count, average day count, and longitudinal counts.
- Identifying clients with multiple program use—e.g., how many people in ES-IND were also served in TH-IND.
- Counting persons by household type—e.g., individual adult male, adult in household with children, or unaccompanied youth.
- Generating frequencies by basic demographic characteristics.
- Cross-tabulating total length of stays within each program-household type, by gender and age.
- Totaling the number of households with children by program type.

UHMIS has established continuum-wide data quality control procedures to ensure the accuracy and completeness of AHAR data collected and reported. On an annual basis (according to HUD's designated data collection schedule), UHMIS will de-duplicate and aggregate the client information collected to produce and submit the AHAR data report.

- The AHAR data collection period is October 1st to September 30th of each year.
- UHMIS will submit the AHAR report electronically through the AHAR Exchange to the HUD-designated private research firm, responsible for compiling the national AHAR.
- A draft AHAR report will be submitted by the HUD-designated date.
- UHMIS and CoC staff will work with the AHAR Research team to correct any data problems.
- The Mountainland CoC staff will do a final review of the AHAR report, and will submit a final AHAR report by the HUD-designated date.

Annual Performance Report

Annual Performance Reports (APRs), formerly called Annual Progress Reports, are required by HUD on an annual basis to track the progress and accomplishments of HUD's Continuum of Care Homeless Assistance Programs.

The APR gathers information on how programs assist homeless persons obtain and remain in permanent housing, increase skills and income, increase access to mainstream resources, and attain greater self-determination. This information is used by HUD and Congress to assess outcomes from federal funding. The APR is also useful to the CoC, grantees, and sponsors as a planning and management tool to analyze client demographics and service needs; to evaluate project outcomes; to make improvements; and to set future goals for their projects.

To ensure accurate reporting and local accountability, it is the policy of the Mountainland' CoC that agencies are to submit a pdf draft copy of their esnaps submission to the HMIS designated staff person 60 days before the APR is due to HUD. Following that review, agencies are to submit a draft copy to the CoC designated staff person. Once the HMIS staff and CoC staff have reviewed the reports and any corrections have been incorporated, the agency may then submit their APR to HUD

Educational Assurances

A portion of the following was originally adopted January 14, 2013

The Mountainland' Continuum of Care (CoC) is committed to ensuring that the educational needs of homeless youth and their families are met. The CoC Education Subcommittee is tasked to assist in coordinating educational and other services to families, ensure families are informed of their eligibility for services, and assist agencies in implementing procedures to meet the educational needs of children within homeless families.

Pursuant to McKinney- Vento McKinney-Vento Homeless Assistance Act a homeless child is defined as a child who does not have a fixed, regular, and adequate nighttime residence or whose primary nighttime location is in a public or private shelter designated to provide temporary living accommodations, or a place not designed for, or ordinarily used as regular sleeping accommodations for human beings.

This definition includes a child who is:
- sharing the housing of other persons due to loss of housing, economic hardship or similar reason (sometimes referred to as double-up);
- living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations;
- living in a car, park, public space, abandoned building, substandard housing, bus or train stations or similar settings;
- abandoned in hospitals;
- awaiting foster care placement; or
- a migratory child who qualifies as homeless because he or she is living in circumstances described above
- an unaccompanied youth is a homeless child not in the physical custody of a parent or guardian who is in a living situation described above.

CoC Project Policy: All new and renewal CoC-funded projects as well as ESG-funded projects which serve homeless families with children are required to have activities in place which ensure that all children are enrolled in school and are connected to other appropriate services such as Head Start and Early Head Start. They are required to assign at least one caseworker to inform families of their eligibility for the McKinney-Vento educational services as well as other services to assist families in accessing these services.

This policy and standard was reviewed and assessed at each project monitoring in the spring and summer of 2015 and will be reviewed with project staff at each annual monitoring visit going forward. All CoC funded and ESG funded projects met the requirements.

The CoC has designated the CoC Assistant Planner as the educational liaison to support the work of the CoC Education Subcommittee which works directly with local educational authorities to meet these requirements and to ensure that sufficient educational services are provided. The Education Subcommittee membership includes the school district homeless liaisons, shelter providers, housing providers, RRH service providers, and Head Start. The school district homeless liaisons and Head Start are also voting members of the CoC and participate in CoC meetings.

New Strategies in 2015

In order to improve upon the current procedures the CoC Assistant Planner:

- Will provide ongoing training to 211 staff and volunteers about the educational services available for homeless children and youth;
- Will task the CSS Subcommittee to address the educational needs of children and youth as they work together to place individuals and families into shelter and housing.;
- Will provide materials to every CoC funded and non-funded service provider to distribute to families; and
- Will ensure that school district homeless liaisons are trained on an annual basis of the services available through the CoC funded and non-funded programs.

Maintaining Family Unity Policy

The CoC is committed to maintaining family unity when homeless households with children under the age of 18 enter homeless shelters, transitional housing or permanent supportive housing. The CoC recognizes the HUD requirement

that projects that receive funding under the CoC and ESG Programs may not deny admission or separate any family members from other members of their family based on age, sex or gender when entering shelter or housing.

Therefore, it is the policy of the CoC to require that CoC and ESG Programs develop and implement policies and procedures which show that the funded program will comply with this directive within three months of the adoption of this policy. The CoC has surveyed shelter and housing service providers in the region regarding their current policies and procedures. CoC Project Support Subcommittee and staff will work with service providers and assist them if needed to revise their policies and procedures. This assurance will be included in the annual monitoring of CoC and ESG funded projects.

As of April 2014 all CoC and ESG programs met this standard. This standard was reviewed and assessed at each project monitoring in the spring and summer of 2015 and will be reviewed with project staff at each annual monitoring visit going forward.

By January 31, 2016 the CoC will develop and implement a process by which families will be notified of this policy and will be advised to call 211 to advise the CoC when they are involuntarily separated.

Monitoring

Two members of the CoC staff (planning assistant, administrative assistant and/or coordinated intake coordinator) and if needed, a CoC leadership member, shall make a semi-annual visit to CoC funded projects. In order to avoid conflicts of interest, the staff or leadership member conducting the visit shall not be a staff member of the agency participating in the project monitoring visit.

The Site/Monitoring Visit will consist of the following activities/components:

1. Tour units/facility, if applicable. Site/unit visits are conducted to evaluate the physical adequacy of the housing provided.
2. Review and discuss most recently submitted APR, including goals and progress.
3. Review random sample of program files: comprehensive file review will be completed on at least one file, with other files reviewed if necessary.
4. Review results of client satisfaction survey and/or conduct client interviews. Arrangements for client interview will be made in advance of the visit.
5. Complete an organizational assessment checklist to verify general agency information and compliance.
6. Identify technical assistance needs (from Continuum of Care or other source).

In addition to an annual Site Visit, the CoC planning assistant will conduct desk monitoring reviews of agency audits, drawdown requests, APRs and other documentation as necessary for the prioritization process and response to the NOFA.

After the site/monitoring visit, a written summary of the visit will be provided to the grantee. The grantee will then have fourteen (14) days to respond in writing to the visit summary report. The Executive Committee will review the summary and any written responses from the grantee.

If, based on project performance and the grantee's written explanation, the Executive Committee has no further response or performance recommendations, the Site/Monitoring Visit Summary and the grantee's written response(s) will be presented to the Review Subcommittee on an informational basis.

If, based on project performance and the grantee's written explanation, the Executive Committee has continued performance concerns, the Executive Committee will draft recommendations to address identified concerns, which will be presented to the Review Subcommittee. The Executive Committee's recommendations to the Review Subcommittee will be accompanied by the Site/Monitoring Visit Summary and the grantee's written response(s). All recommendations approved by the Review Subcommittee will be signed by the Subcommittee Chair and provided in

writing to the grantee. Timelines for corrections and follow-up visits are anticipated to be sixty (60) days or less, but will be defined on a case-by-case basis in the approved recommendations.

The process of Follow-up Visits, summaries, and reports to the Review Subcommittee will follow the same the process as the initial Site/Monitoring Visit. However, follow-up Visits will specifically address grantee's fulfillment of the recommendations of the Review Subcommittee.

ESG Recipient Monitoring

The Continuum of Care will work with ESG funders at the State, and City level to coordinate the monitoring of outcomes of recipients of ESG funding. Grantee activities will be monitored to assure compliance with applicable Federal requirements and to determine whether or not performance goals are being achieved. The Continuum of Care will work with the State, and City ESG funders to develop the performance standards and evaluate outcomes of ESG-funded projects.

Outreach Methodology

The Mountainland Continuum of Care is committed to outreach to people experiencing homelessness. A key ingredient to this outreach is the ability to connect the homeless population to housing and services. CoC funded programs and CoC non-funded programs understand that many people living on the streets exhibit mental illness, substance addiction, and other negative behavior patterns. They also understand that it is essential to design outreach activities that take into account the needs and characteristics of different subpopulations including persons with mental illness, youth, families with children, veterans, minorities, persons dealing with substance abuse, persons with physical disabilities, and others.

The CoC is committed to ensuring awareness of and access to housing and supportive services to persons that may benefit from CoC funded programs including those persons who are not currently participating in a CoC funded or other program and/or who are least likely to request housing or services. Therefore it is the policy of the CoC to carry out the following outreach and awareness activities:

1. Direct street outreach
2. 211 – phone and internet available in English and Spanish with translation available in other languages
3. Marketing of housing and support services in locations that may be frequented by persons who are homeless (i.e. libraries, laundromats, city recreational facilities, box stores, soup kitchen, food pantries, hospital emergency rooms, health clinics, etc.) in both English and Spanish
4. 211/coordinated intake and assessment information shared with targeted groups who may interact with persons who are homeless (e.g. churches, law enforcement, victim advocates, health clinics, hospital social workers and emergency room staff, school district homeless liaisons and school counselors, city parks and recreation staff, businesses in areas frequented by persons who are homeless, downtown business alliance, and others.

Prioritizing Veterans' Services

Recognized as a prioritized population both locally and nationally, the Mountainland Continuum of Care networks with CoC and non-CoC agencies and non-profit organizations to help service homeless veterans. There are a number of efforts instigated by Continuum leaders to help target and service this population.

First, the Continuum of Care assesses veterans' status through coordinated intake screenings. If affirmed by the client verbally, and if official paperwork is presented (a DD-214 or a VA Medical Card), case managers should ask clients if they have sought assistance through the VA or other veteran's homeless groups. If not, case managers should attempt to contact the Homeless Veterans' Fellowship ((801) 689-1516; 801-821-3008), an agency that offers statewide homeless assistance to veterans and their families if they have been enrolled in active duty at least one day. This agency is able to provide specialized benefits for veterans, including rapid re-housing services and SSVF services that include homeless prevention for families. This agency is very involved in the Continuum and assigns a case manager to participate in the Coordinated Support Services subcommittee every two weeks.

If the client does not know where to locate their documentation, the case manager should attempt to contact our regional local VA contact, Gary Stearman, at 801-326-2372 to help affirm status and benefits. Only the client can request this information and can give permission to have their DD-214 sent in the mail to a home address or agency. If the VA is unavailable, the client can fill out a VA release of information to allow the Homeless Veterans' Fellowship to assist them in this process. However, if no veteran's documentation can be found through either of these entities, the client will be referred back to general housing services and prioritized by their VI-SPDAT and SPDAT scores.

Additionally, the Continuum educates local volunteer groups about available housing resources for veterans in a homeless situation. Entities include the local Vet Center, a veterans' case manager at the local Department of Workforce Services agency, American Red Cross volunteers, and other community members associated with the Utah Department of Veteran's and Military Affairs. Continuum representatives meet with local veterans volunteer groups once a month to offer support, information, and updates.

Safety and Privacy of Domestic Violence Survivors Assurances

It is the policy of the CoC to collaborate with service providers to ensure the safety and privacy of domestic violence survivors that are served in any CoC or ESG Program-funded project. The CoC Project Support Subcommittee and staff will seek assistance from the DV shelter programs in the region to provide guidance and training to other service providers to meet this assurance. The types of policies and procedures include: confidentiality, workplace violence and safety, safe living environment, etc. This assurance will be included in the annual monitoring of CoC and ESG funded projects.

List of Acronyms

AHAR	Annual Homeless Assessment Report
APR	Annual Performance Report
ARA	Annual Renewal Amount
ARD	Annual Renewal Demand
ARRA	American Recovery and Reinvestment Act
BOS	Balance of State CoC
CAP	Community Action Program
CH	Chronically Homeless
CoC	Continuum of Care
CDBG	Community Development Block Grant
DWS	Department of Workforce Services
DUNS #	Data Universal Numbering System
ESG	Emergency Shelter Grant (Federal)
eSnaps	Online Application and Grants Management System for HUD's Homeless Programs
FMR	Fair Market Rent
FPRN	Final Pro Rata Need
GIW	Grant Inventory Worksheet
HDX	Homeless Data Exchange
HEARTH Act	Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009
HMIS	Homeless Management Information System
HHN	Hold Harmless Need
HPRP	Homeless Prevention Rapid Re-Housing
HUD HRE	HUD Homeless Resource Exchange
HUD	Department of Housing and Urban Development (Federal)
LRP	Long-Range Planning Committee
NOFA	Notice of Funding Availability

NSP	Neighborhood Stabilization Program
PH	Permanent Housing
PIT	Point-In-Time (annual count of homeless persons)
PPRN	Preliminary Pro Rata Need
PRA	Project-based rental assistance
PSH	Permanent Supportive Housing
RFP	Request for Proposals
RHASP	Rural Homeless Assistance and Stability Program
SCSO	State Community Services Office
SH	Safe Haven
SHP	Supportive Housing Program
S+C	Shelter plus Care Program
SRA	Sponsor-based Rental Assistance
SRO	Single Room Occupancy
SSO	Supportive Services Only
TH	Transitional Housing
TRA	Tenant-based Rental Assistance
VASH	Veteran's Affairs Supportive Housing

Mountainland Continuum of Care
MONITORING AND ORGANIZATIONAL ASSESSMENT OF CoC & ESG FUNDED PROGRAMS

Purpose:
- To monitor Grantee activities to assure compliance with applicable Federal requirements and to determine whether or not performance goals are being achieved. Monitoring will also be used to identify possible issues that would affect an agency's capacity in meeting the contracting requirements of a CoC and/or ESG award.
- To assist grant reviewers with additional information in assessing and rating an agency's managerial and program capacity.

Please answer the following questions and provide details where required:

Section I: GENERAL AGENCY INFORMATION

Agency Name:_____

1.   How long has the agency been operating?

        When did agency first receive its 501(c) 3 status (if applicable)?

2.   Has the agency ever received a grant from Mountainland CoC?   YES   NO

        If yes identify what grants were received, when, and for how much?

3.   Does the agency have any full and/or part-time PAID staff members? YES   NO

If YES how many?   Full time_____   Part time_____

4.   In the last twelve months, have there been any changes in key agency staff or program staff? (Include key non-paid staff).   YES   NO

If so, please explain:

5.   Has the agency received a negative finding in a fair housing complaint, or any other similar action?

If so, please explain:

6.   Has the agency ever been fined or otherwise penalized by a taxing agency?

If so, please explain:

7.   Other than discussed above, does the agency or its management have any history of complaints resulting in legal or other formal action?

If so, please explain:

Section II. MINIMUM QUALIFICATIONS

1.   You must operate the CoC funded project within Utah, Wasatch, and/or Summit Counties. Location of services:_____

2.   The agency or its management cannot apply if they are currently prohibited from receiving government funding, as a result of a debarment.

3.   Agency must be currently registered with the Utah State Department of Commerce.

4.   If a Non-Profit, must have evidence of 501c3 status from the IRS.

Section III. COMPLIANCE ISSUES

Grant Recipients must be able to comply with the following program requirements.

1.   Agency must have or obtain a federal DUNS number to facilitate federal tracking of grant expenditures.

2.   If your agency serves clients outside of Utah, Wasatch, or Summit Counties, how will the program ensure that CoC grant funds and required matching funds will only serve residents of these counties?

3.   Agency must be able to expend the grant funds and matching funds for eligible   activities within a 12 month period. Review documentation of matching funds and in-kind.

4.   Additional Program Specific Compliance Requirements for CoC funded projects
Please check the box to indicate which requirements your agency meets:

☐   **Eligible Objectives and Activities:** Must meet one of the CoC HUD   program's goals and be an eligible activity.

- ☐ **Eligible Geographic Area:** Use funds to serve people living in Utah, Wasatch, and/or Summit
   Counties.
- ☐ **Project Meets Homeless Definition:** Activities must serve homeless persons as defined by HUD.
- ☐ **Licenses and Certification:** Grant Recipients must have all required licenses and certification required by State law.
- ☐ **Employee Status Verification System:** Agency must use this system for all new hire employees.
- ☐ **Conflict of Interest Policy:** Grant recipients must have a policy stating there are not any conflicts of interest within the organization.
- ☐ **Communication Policy:** no grant requirement but a good administrative practice.
- ☐ **Language Assistance Plan:** no grant requirement but a good administrative practice. Grant Recipients are encouraged to have a Language Assistance Plan.
- ☐ **Nondiscrimination Policy:** All Grant Recipients must have a Non-Discrimination Policy.
- ☐ **Procurement Policy:** Grant Recipients are required to have a written procurement policy.
- ☐ **HMIS Policy and Participation:** Have procedures in place to collect and report data in Utah HMIS unless exempt by federal law.
- ☐ **Eligibility Record Keeping:** All Grant Recipients are required to keep adequate program participant records/files to prove eligibility for services. Monitor will do a comprehensive review of a minimum of one case file.
- ☐ **DUNS #:** Have or obtain a federal DUNS number to facilitate federal tracking of grant expenditures.
- ☐ **Board Requirements:** nonprofit agency should have an active engaged Board.
- ☐ **Education Assurance:** project meets educational assurance for carrying out activities that ensure families have access to McKinney-Vento services for homeless youth and children.
- ☐ **Family Unity Assurance:** project ensures that family unity is maintained in homeless shelters or housing.
- ☐ **Safety and Privacy of Domestic Violence Survivors Assurance**: project has policies and practices in place to ensure the safety and privacy of domestic violence survivors.

Section IV: SPECIFIC FISCAL & ORGANIZATIONAL CAPACITY QUESTIONS

1.   Have any of the current agency or program staff had experience in managing government grant funds?   YES   NO
     If YES, provide additional detail below
- Name of staff person (s) :
- Type of Government funds (give examples)
- Source of funding: (State, Federal, County, City)

2.   Measuring project progress. Has the project met projected goals? If not, please explain.

3.   How does agency keep track of its revenues and expenses? What financial accounting method is used by the agency? (List options check all that apply)

Handwritten Ledger	Accrual method
Excel Spreadsheet	QuickBooks Accounting Program
Quicken Accounting program	Other: _____

4. Does the agency have a chart of accounts to differentiate between revenue/expense resources:
     YES   NO

5. How often does the agency drawdown funds through LOCCS?

6. Does the agency have written policies and procedures on how agency funds are to be handled?

      YES   NO

7. Has agency ever had a formal independent audit of its books? YES   NO

      If YES, who did the audit and when was it completed?

     If NO, what steps are taken to review financial records?

8. Is the agency currently under corrective action from a previous audit finding?

     YES   NO

     If so, please explain:

9. Is the agency currently under corrective action from a previous HUD monitoring finding or concern?

     YES   NO

     If so, please explain:

10. If the agency has paid employees, does the agency currently have Worker's Compensation Insurance?   YES   NO

     If not, please explain.

11. Does the agency currently have a liability insurance policy?   YES   NO

     If yes, who is the insurance company?
     If not, please explain.

12. Agency's Board of Directors:

- How often does the board meet?

- When was the last board meeting held and were written minutes kept of this meeting?

- Does the board have a written set of by-laws governing its operation?

- For CoC or ESG, does the agency have the appropriate representation by a homeless or formerly homeless individual on the Board or in a decision making role?

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) is entered into by member agencies of the Mountainland Continuum of Care, Mountainland Head Start, and United Way's Help Me Grow program.

> The Mountainland Continuum of Care is a federal program that includes member agencies that provide housing services for homeless individuals and families. The ultimate goal and purpose of the Mountainland Continuum of Care is to end and prevent homelessness in Utah, Wasatch, and Summit Counties. Member agencies that serve families with children include Community Action Services and Food Bank and the Center for Women and Children in Crisis.

> Mountainland Head Start provides free early childhood education to children ages 3-5 with families that fall below the national poverty line. The mission of Head Start is to promote school readiness for children and self-sufficiency for families through quality comprehensive services and community partnerships. They offer services in Utah, Juab, and Wasatch Counties.

> United Way's Help Me Grow Program provides free early child development assessment and mentoring through a resource call center or online service. Families of all incomes are welcome to participate in this program. This program serves families throughout central and southern Utah.

A. Purpose.
The purpose of this MOU is to ensure that children who belong to families with unstable housing conditions receive adequate child development services, with an aim to rapidly stabilize the family housing situation. Both housing and child development agencies can ensure that children who fall into these criteria are receiving both stable housing and adequate early childhood education services.

B. Roles and Responsibilities.
Mountainland Continuum of Care agencies agree to:
- Advertise early education programs at agency entry points (e.g., foyers, waiting rooms, etc.) and in case management appointments. This includes Head Start enrollment fliers/posters, Help Me Grow fliers/posters, and other applicable handouts.
- Evaluate family size and dependents at intake. Case managers will refer families to enroll children ages 3-8 to Head Start (3-5) and/or Help Me Grow (infant-8) programs.
- When referrals are received for rental assistance, Community Action Services and Food Bank will attempt to either prevent eviction or rehouse the family within 30 days of intake.

Mountainland Head Start family services staff agree to:
- Be trained in housing resources offered through the Continuum through formal training or by reviewing resources online at mountainlandcoc.org.
- Refer families to housing resources when families report that they are in an unstable housing situation. Unstable housing conditions include: living in places not meant for human habitation, anticipation of an eviction from a landlord within two weeks, or attempting to flee domestic violence. Families who could benefit from Section 8 assistance should also be referred to local housing authorities.

Help Me Grow Staff agree to:

- Refer (or transfer) families who self-report unstable housing to the 2-1-1 resource line. 2-1-1 staff will communicate housing resources to clients that best fit their situation.

C. Funding/Benefits.
No direct funding resources will be awarded to programs who agree to this MOU. Benefits include increasing families' self-sufficiency and providing more stable environments for young children. Children needing housing resources will also benefit from having access to child development resources.

D. Timeframe
This MOU will commence on September 9th, 2016 and will be reviewed annually in preparation for HUD's SuperNOFA competition.

E. Confidentiality
In order to ensure the safety of clients, all parties to the memorandum of understanding agree to adhere to the confidentiality expectations as outlined in VAWA (when domestic violence cases are involved) and HIPPA statements (Head Start clients). Client information may only be shared in compliance with these statements and client consent. Client information may only be shared with the least information possible in order to connect clients to resources. The designated lead agency (Community Action Services and Food Bank) accepts full responsibility for the performance of the collaborative organizations/agencies.

F. Signatories
This Memorandum of Understanding is the complete agreement between the Mountainland Continuum of Care and United Way of Utah County and Mountainland Head Start and may be amended only by written agreement signed by each of the parties involved.

Mountainland Continuum of Care (Community Action Services and Food Bank)

Authorized Official:
Printed Name and Title: _Myla Dutton Exe. Dir._   Signature: _Myla J Dutton_

Address: _815 So. Freedom Blvd, Suite 100, Provo, Ut 84601_

Telephone(s): _801.691.5250_

E-Mail Address: _mdutton@communityactionuc.org_

Mountainland Continuum of Care (Center for Women and Children in Crisis)

Authorized Official: _Transitional housing/aftercare coordinator_
Printed Name and Title: _Bailey Call_   Signature: _____

United Way of Utah County (Help Me Grow)

Authorized Official:
Barbara Leavitt, Director.HmGu
Printed Name and Title

Barbara I Leavitt
Signature
9/12/2016

Mountainland Head Start

Authorized Official:
Sonia L Pineda, Executive Director
Printed Name and Title

Signature