

West Central Illinois Continuum of Care Consortium Governance Charter¹

I. Overview

A. Governance Charter Purpose

This document sets forth:

- Guiding principles of membership and participation in the West Central Illinois Continuum of Care Consortium (the Continuum)²
- Responsibilities³ delegated by the Continuum to its Council (WCI Homeless Assistance Council), committees, and agents
- Provisions for Continuum governance through the Council and key policies and processes

B. Contents

The sections of this Charter are as follow:

- I. Overview
- II. The Continuum of Care
- III. WCI Homeless Assistance Council
- IV. Committees, Working Groups & Task Forces
- V. Continuum Policies
- VI. Appointed Entities
- VII. General Provisions

¹ A draft version of the Indianapolis Continuum of Care Governance Charter was used as a starting point in creating this document for West Central Illinois Continuum of Care Consortium, available at <http://indycoc.org/>.

² This Continuum of Care "IL 519" as designated by HUD. WCI Homeless Assistance council includes eleven counties in west central Illinois, in the counties of: Adams, Brown, Cass, Hancock, Henderson, McDonough, Morgan, Pike, Schuyler, Scott, and Warren counties.

³ See Appendix A for Responsibilities of the Continuum defined by Interim Rule 24 CFR §578.7 located at end of charter.

C. Acronyms

Acronyms used in this document:

- CAA Community Action Agency
- CFR Code of Federal Regulations
- CoC Continuum of Care
- CES Coordinated Entry System
- CSH Corporation for Supportive Housing
- DCEO Department of Commerce and Economic Opportunity
- DHS Department of Human Services (formerly known as Public Aid)
- ESG Emergency Solutions Grants
- HAIL Housing Action Illinois
- HMIS Homeless Management Information System
- HPC High-Performing Community
- HUD U.S. Department of Housing and Urban Development
- IHDA Illinois Housing Development Authority
- IIRA Illinois Institute for Rural Affairs
- LGBT Lesbian Gay Bi-Sexual Transgender
- MOU Memorandum of Understanding
- NOFA Notice of Funding Availability
- ROE Regional Office of Education
- SHPA Statewide Housing Providers Association
- UFA Unified Funding Agency
- VAWA Violence Against Women Act
- VSP Victim Service Provider
- WCI West Central Illinois

D. Terms & Definitions⁴

WCI Homeless Assistance Council is the governing Council established to act on behalf of the Continuum using the process established as a requirement by C.F.R. §578.7(a)(3) and in compliance with the conflict-of-interest requirements at §578.95(b).

CoC Program Grantee (Recipient) is the CoC Program Grantee is the “recipient” as used by HUD and means an applicant that signs a grant agreement with HUD.

Collaborative Applicant means the eligible applicant that has been designated by the Continuum of Care to apply for a grant for Continuum of Care planning funds under this part on behalf of the Continuum. Section VI of this Charter designates the YWCA of Quincy as the Collaborative Applicant for the Continuum.

⁴ For additional information, see Appendix B to this Charter.

The Continuum (Continuum of Care) means the group organized to carry out the responsibilities required by the HUD CoC Program and that is composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.

ESG Lead Applicant means the entity designated by the Continuum of Care to apply to the Illinois Department of Commerce and Economic Opportunity's Emergency Solutions Grant Program on behalf of two or more service providers when organizations need to apply together, in a region, in order to meet minimum funding request thresholds. The Lead Applicant will require memorandum of understanding or some other type of agreement with the other service providers (sub-recipients) involved in the grant request.

ESG Sub-recipients are the entities that are recipients of Emergency Solution Grant Program funds from Lead Applicants. The Emergency Solution Grant Program funds come from the Illinois Department of Commerce and Economic Opportunity.

Homeless Management Information System (HMIS) means the information system designated by the Continuum of Care to comply with the HMIS requirements prescribed by HUD. Starting in 2012, the Continuum uses ServicePoint from Bowman Systems, Shreveport, LA. From 2004 to 2011, the Continuum used ROSIE from Municipal Information Systems, Inc., St. Louis, MO.

HMIS Lead means the entity designated by the Continuum of Care to operate the Continuum's HMIS on its behalf. Section VI of this Charter designates the YWCA of Quincy as the HMIS Lead for the Continuum.

Meetings are defined as in-person meetings with conference calls access.

Notice is defined as adequate for this Charter when it meets any time required and the Support Entity:

- Delivers the content electronically to Continuum member lists; and
- Posts the content to the Continuum website (www.wciccc.com)

This further requires that:

- Members take responsibility for providing their electronic contact information to the Support Entity;
- Committees disseminate the notice to their members; and

- Continuum members disseminate the notice both electronically and onsite as appropriate to its clients, staff and volunteers.

Population/service hub represents a geographic area where clients seek services. The three largest population/service hubs in the Continuum are Quincy, Jacksonville, and Macomb.

Service area for the Continuum consists of eleven counties: Adams, Brown, Cass, Hancock, Henderson, McDonough, Morgan, Pike, Schuyler, Scott, and Warren.

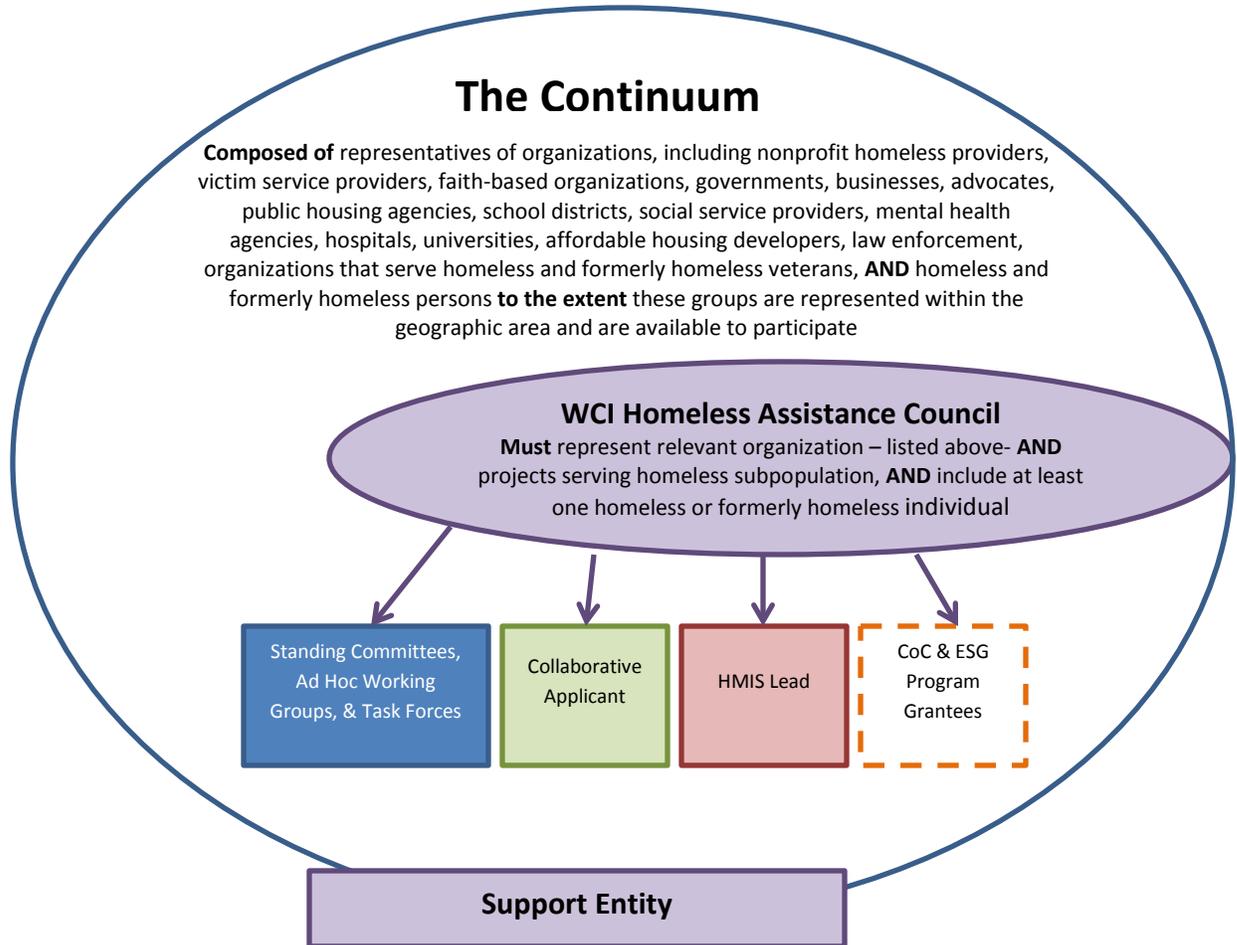
Support Entity is the coordination hub responsible for:

- Providing logistical support for Continuum responsibilities as in Interim Rule – 24 CFR §578.7;
- Convening and facilitating the WCI Homeless Assistance Council and key working groups;
- Monitoring strategic coherence across efforts;
- Coordinating communication within the Continuum;
- Managing collective data systems and information distribution; and
- Stewarding resources for collective impact as appropriate

The Support Entity performs the roles of advocate, planning consultant, project manager, and logistics staff – though always free to delegate elements of its responsibility to appropriate Continuum participants and/or contracted support as appropriate. Section VI of this Charter designates the YWCA of Quincy as the Support Entity for the Continuum.

E. Overview of Continuum Structure

The implementation structure as depicted here consists of the following key elements:



1. Continuum of Care (CoC)

The Continuum of Care embodies these concepts:

- **The HUD CoC Program-Defined Continuum of Care:** It is the community planning body that works to prevent homelessness. It organizes and delivers housing and services to meet the specific needs of people as they move to stable housing and maximize self-sufficiency.
- **A System of Housing & Services:** It is the system of housing and service entities that provide a broad range of homelessness prevention and intervention services to the community, the pieces of which leverage one another in assisting individuals and families in moving to stable housing. It incorporates outreach, engagement, assessment, prevention, shelter, housing, and services to successfully achieve self-sufficiency.
- **Other county-wide planning entities located in its eleven-county service area.**

Further, its members includes nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans, and homeless and formerly homeless individuals.

2. WCI Homeless Assistance Council

The WCI Homeless Assistance Council is the governed by the HUD CoC Programs governance charter and code of conduct and recusal process and meets all formal HUD requirements. As such, it is the oversight and communication hub for Continuum planning, implementation, and evaluation. It connects CoC members, monitors implementations, scans for innovations, assesses the Continuum, makes recommendations, and ensures participation of required groups, and drives planning and evaluation.

3. Standing Committees, Ad Hoc Work Groups & Task Forces

Standing committees, working groups, and task forces are the action planning components of the system. In these bodies, strategies are developed, deepened and expanded into timed work plans. These groups may also be directly responsible for exploring options or developing specific strategies to solve particular concerns.

Among the standing committees is the CoC Program Application Committee that reports to the WCI Homeless Assistance Council and the Continuum just as other committees do. However, it is supported in a different way.

- The CoC Program Grantee plays a role similar to that of the Support Entity for this committee, including communication with HUD.
- The Collaborative Applicant is the coordinator for the program application with assistance from the Support Entity.

4. Support Entity

The YWCA of Quincy has been designated as the Support Entity for the Continuum. The Support Entity has the staff and skills to coordinate Continuum members as they implement projects. It is the coordination hub responsible for:

- Providing logistical support for Continuum responsibilities as in Interim Rule – 24 CFR §578.7;
- Convening and facilitating the WCI Homeless Assistance Council and key working groups;
- Monitoring strategic coherence across efforts;
- Coordinating communication within the Continuum;
- Managing collective data systems and information distribution;
- Mobilizing planning efforts that frame future community-wide plans and their revisions; and
- Stewarding resources for collective impacts as appropriate.

The Support Entity performs the roles of advocate, planning consultant, project manager, and logistical staff – through always free to delegate elements of its responsibility to appropriate Continuum members and/or contract support as appropriate. The Support Entity may be compensated by the CoC Planning Grant.

This structure leaves intact existing entities that are functioning well or are in the process of forming. It also allows the Continuum to adapt to new needs as they arise. As defined in this Charter:

- The Continuum is the collaborative body implementing homeless prevention and intervention strategies;
- The Support Entity staffs the work of the Continuum as a body, holding the work together, reports to the Council and Collaborative Applicant;
- The WCI Homeless Assistance Council acts on behalf of the Continuum to maintain momentum and oversight;
- Committees and the like are responsible for specific activities and strategies, reporting to the Council;
- The Collaborative Applicant applies for HUD’s CoC Program funding, reporting to the Council;
- The HMIS Lead operates the Continuum’s data system, reporting to the Council;
- The CoC Program Grantee is the official recipient of CoC Program funds – outside the control of the Continuum it works closely with the Council and Collaborative Applicant; and
- The DHS Homeless Prevention Program Grantee is the official recipient of DHS Homeless Prevention Program funds – outside the control of the Continuum it works closely with the Council;
- The ESG Program Grantee is the official recipient of ESG Program funds – outside the control of the Continuum it works closely with the Council.

II. The Continuum of Care

A. Continuum Mission, Vision, Purpose & Responsibilities

Mission: The mission of the Continuum is to coordinate all stakeholders, systems, and resources available to prevent and end homelessness in West Central Illinois.

Vision: The vision of the Continuum is to make homelessness rare, short-lived and recoverable.

Purpose: The Continuum embodies three concepts:

- **A System of Housing & Services:** It is the system of housing and service entities that provide a broad range of homelessness prevention and intervention services to the community, the pieces of which leverage one another in assisting individuals and families moving to stable housing. It incorporates outreach, engagement, assessment, prevention, shelter, housing, and services to successfully achieve self-sufficiency.
- **The HUD CoC Program-Defined Continuum of Care:** It is the community planning body that works to prevent homelessness. It organizes and delivers housing and services to meet the specific needs of people who are homeless as they move to stable housing and maximize self-sufficiency.
- **Other county-wide planning entities located in its eleven-county service area.**

Responsibilities: Specifically, it is obliged to:

- **Performance Targets & Monitoring**
 - Establish appropriate performance targets by population and program in consultation with the ESG and CoC Program Grantee and sub-recipients;
 - Monitor performance and evaluate outcomes of ESG and CoC programs;
 - Develops a fair process for performance improvement and recommend action per that process and take action against poor performers⁵;
 - Annually review Emergency Solutions Grant (ESG) Guidebook and the PSH Policies and Procedures, the written standards manual that WCICCC's providers use to operate their programs;
 - Report to HUD;

- **Centralized or Coordinated Entry**

⁵ The 2012 CoC Planning Grant, which was funded, included development of this documentation and process.

- Establish and:
 - Operate a centralized or coordinated entry system in consultation with ESG-funded recipients that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services.
- Develop policies on how system will address the needs of individuals who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers.
- Develop and follow written standards for providing CoC assistance in consultation with ESG-funded recipients that include:
 - Policies and procedures for evaluating individuals' and families' eligibility for assistance
 - Policies and procedures for determining and prioritizing which eligible individuals/families will receive transitional housing; RRH; and PSH;
 - Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance.
- Comply with any requirements established by HUD.
- **Develop Written Standards** for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance per HUD Notice CPD-16-11. See WCICCC Homeless Assistance Council Permanent Supportive Housing Written Standards & Chronic Prioritization-Appendix F
- **HMIS**
 - Designate a lead agency to manage the HMIS;
 - Designate a single Homeless Management Information System (HMIS) for the geographic area;
 - Review, revise, and approve privacy, security, and data quality plans;
 - Ensure consistent participation of the CoC and ESG Program Grantee and sub-recipients in HMIS; and
 - Ensure that the HMIS is administered in compliance with HUD requirements.
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- **CoC Planning that Includes**
 - Coordinate implementation of a housing and service system that meets the needs of the homeless individuals (including unaccompanied youth) and families that encompasses:
 - Outreach, engagement, and assessment;
 - Shelter, housing, and supportive services;
 - Prevention strategies

- Conduct a point-in-time count of homeless people at least biennially that meets the following requirements:
 - Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons;
 - Person living in emergency shelters and transitional housing projects must be counted as sheltered;
 - Other requirements established by HUD
 - Conduct an annual gaps analysis of homelessness needs and services;
 - Participate in the Illinois Housing Development Authority's Consolidated Planning efforts;
 - Participate in Corporation for Supportive Housing (CSH), Housing Action Illinois (HAIL), or Statewide Housing Providers Association (SHPA) efforts;
 - Consult with state (DHS) and local ESG recipients in the service area on the plan for allocating ESG funds and reporting/evaluating performance of ESG programs.
- **Application for CoC Program Funds**
 - Design, operate and follow a collaborative process for developing applications and approving submission of applications in response to a CoC Program NOFA;
 - Establish priorities for funding projects;
 - Determine if one or more applications will be submitted
 - If more than one, designate the Collaborative Applicant;
 - If only one, the applicant is the Collaborative Applicant; and
 - Rank multiple applications and approve the CoC application.
 - **Application for DHS Homeless Prevention and DCEO ESG Program Funds**
 - Design, operate and follow a collaborative process for developing applications and approving submission of applications in response to a state NOFA for Homeless Prevention or ESG Program Funds;
 - Establish priorities for funding projects;
 - Determine if lead applicant(s) will be needed to submit application and then designate the applicant(s), one by population/service hub; and
 - Rank multiple applications if required by funder.

Delegation: The Continuum has delegated elements of its day-to-day work to the WCI Homeless Assistance Council, committees, and contractors as described in this Charter. However, the Continuum retains all of its responsibilities. Responsibilities extend to approval of the CoC Program application, even if it designates eligible applicants other than itself to apply for funds.

B. Continuum Membership Composition & Voting Rights

Composition: The Continuum is composed of:

- The following to the extent they are represented within the geographic area and are available to participate:
 - Nonprofit homeless providers;
 - Prevention service providers;
 - Victim service providers;
 - Disaster planning and prevention agencies;
 - Faith-based organizations;
 - Funders;
 - Governments;
 - Businesses;
 - Advocates;
 - Public housing agencies;
 - School districts;
 - Social service providers;
 - Medical professionals;
 - Mental health agencies;
 - Hospitals;
 - Universities;
 - Affordable housing developers;
 - Law enforcement;
 - Organizations that serve homeless and formerly homeless veterans
- Homeless and formerly homeless persons;
- Representatives from the following:
 - Collaborative Applicant;
 - CoC Program Grantees;
 - ESG Grantees;
 - HMIS Lead;
 - Support Entity; and
- Anyone/entity committed to the prevention and ending of homeless is welcome in the Continuum. A public invitation for new members will be made annually by the Collaborative Applicant. Collaborative applicant will also invite all CoC Members to join committees on an annual basis.

Voting Rights: Those individuals that meet the following provisions are eligible to vote at Continuum meetings.

- Self-identification as homeless or formerly homeless OR

- Active participation in the Continuum over the prior 12 months as demonstrated by Continuum, WCI Homeless Assistance Council and/or Committee attendance sheets. Active participation is considered attending 80% of the meetings.

The Support Entity will maintain eligibility lists and make them available prior to all meetings of the full Continuum.

The Support Entity may participate in Continuum discussion but may not vote.

C. Continuum Meetings

Frequency: The Continuum will hold full membership meetings at least two (2) times per year at a time and location determined by the WCI Homeless Assistance Council. The WCI Homeless Assistance Council will select a meeting location that is accessible to both potential homeless participants, and in regard to ability/disability.

Open Meeting: Meetings of the Continuum will be open to any interested person.

Agendas: The WCI Homeless Assistance Council will disseminate agendas in advance of the meeting.

Notice: The Continuum will publish agendas in advance of the meeting and publicly invite new members at least annually. Thirty (30) day notice will be given for meetings of the Continuum. *See definition of Notice in Overview section of this Charter.*

Quorum: Quorum for the transaction of business at Continuum meetings will be defined as those present at a properly noticed meeting.

Voting: Each member must be present to vote on Continuum matters. Votes will be by voice or ballot at the will of the majority of those in attendance. No member may vote on any item that presents a real or perceived conflict of interest.

Proxy: There is no proxy voting. Decision-making requires live conversation and active participation from all parties.

Action Without a Meeting: The Continuum will not take action as a whole without meeting.

III. The WCI Homeless Assistance Council

A. WCI Homeless Assistance Council Roles & Responsibilities

Definition: WCI Homeless Assistance Council is the body that makes recommendations to the full Continuum and acts as the day-to-day decision-making group.

The Council as a Whole: The WCI Homeless Assistance Council is the designated entity for managing the CoC Program process in West Central Illinois, including the ranking of proposals for submittal to the US Department of Housing and Urban Development under the annual NOFA. The WCI Homeless Assistance Council designs, coordinates, and reviews the HUD CoC grant application process for the Continuum, which includes defining community priorities and ranking CoC Program applications for approval through the CoC Program Grantee. The WCI Homeless Assistance Council coordinates and reviews the DHS Homeless Prevention and DCEO ESG grant application process for the Continuum.

As such it acts on behalf of the Continuum and ensures that the Continuum:

- Scans the environment for best practices and innovations;
- Assesses the Continuum for gaps, overlaps, duplication, strategic conflicts, etc.; and
- Coordinates semi-annual Continuum meetings.

In addition, the WCI Homeless Assistance Council is responsible for:

- Working closely with the designated Collaborative Applicant to fulfill major duties of the Continuum;
- Participate in Corporation for Supportive Housing (CSH), Housing Action Illinois (HAIL), or Statewide Housing Providers Association (SHPA) efforts;
- Monitoring implementation and ongoing alignment with vision, goals and strategies;
- Overseeing periodic planning and annual plan revisions;
- Making recommendations to the Continuum about priorities as well as formal/informal relationships;
- Actively seeking out participation from each group listed below, for both the Continuum and its committees
 - Nonprofit homeless providers;
 - Victim service providers;
 - Faith-based organizations;
 - Governments;
 - Businesses;
 - Advocates;
 - Public housing agencies;
 - School districts;
 - Social service providers;
 - Mental health agencies and substance abuse providers;
 - Hospitals, health care institutions and practitioners;
 - Universities;
 - Affordable housing developers;
 - Law enforcement;
 - Organizations that serve homeless and formerly homeless veterans;
 - Homeless and formerly homeless persons.

- Ensuring transparent governance within the Continuum and monitoring potential conflicts of interest;
- Delegating activities to and overseeing committees, working groups and task forces as appropriate;
- Designating the HMIS Lead to manage the HMIS system in West Central Illinois;
- Ensuring consultation of ESG recipient throughout planning and implementation of Continuum activities.

Individual Members: Individuals serving on the WCI Homeless Assistance Council must:

- Commit to preventing and ending homelessness;
- Attend meetings of the WCI Homeless Assistance Council and bi-annual meetings of the Continuum;
- Participate as an active member of at least one standing committee;
- Seek out input from the peers, industry, and/or population he/she represents;
- Bring that input to WCI Homeless Assistance Council deliberations, while remaining attentive to unrepresented views;
- Communicate WCI Homeless Assistance Council work to the peers, industry, and/or population he/she represents;
- Adhere to all Governance Charter policies.
- In collaboration with the Collaborative Applicant and the HMIS Lead, annually review and update the governance charter to comply with 24 CFR 578 and HMIS requirements prescribed by HUD.

B. WCI Homeless Assistance Council Number, Terms, Composition & Guidelines

Number: The WCI Homeless Assistance Council will operate with neither fewer than 9 nor more than 11 elected members with at least 50% elected at any given time. The precise number for any given year will be announced with the annual call for nominees.

Terms: With the exception of the founding election, WCI Homeless Assistance Council members will serve three (3) year terms up to a maximum of six (6) consecutive years (including partial terms) before rotating off for at least one (1) year. Member terms will be staggered such that approximately one-third (1/3) are up for selection each year. *See WCI Homeless Assistance Council Member Elections.*

Composition: Members of the WCI Homeless Assistance Council represent local funders, government, services providers, consumers, and other community members whose interest relate to homeless services and housing systems. Specifically, the WCI Homeless Assistance Council consists of the following:

- Seven to Eleven (7-11) **Elected Seats**
 - One (1) Health Care Institution, Practitioner, or County Health Department Designee
 - One (1) Mental Health or Substance Abuse Provider
 - One (1) ROE McKinney Vento Liaison or Designee
 - One-Three (1-3) Housing Authority Provider

- One-Two (1-2) Homeless or Formerly Homeless Individuals
- Two-Four (2-4) Members At-Large
- One (1) ESG Program Grantee or Subgrantee
- Named designees for up to three (3) **Appointed Seats**
 - Collaborative Applicant
 - HMIS Lead
 - Support Entity
- Named designees for up to six (6) **Appointed-Advisory Seats** based on population/services hubs with active CoC/ESG grants
 - One-Three (1-3) CoC Program Grantee
 - One-Three (1-3) ESG Program Grantee or Subgrantee

Guidelines: In managing WCI Homeless Assistance Council number and composition, the following will be true:

- The following entities should be considered for at-large Council seat, if they are not represented by then-seated Council: victim service providers, veteran service providers, faith-based organizations, businesses, law enforcement, and city or county officials; and direct service providers can include those who do and do not receive federal funding;
- No organization may have more than two (2) staff people seated on WCI Homeless Assistance Council at any time, regardless of which seats they occupy;
- The three largest population hubs (Quincy, Jacksonville, and Macomb) must be represented by the organizations seated on the WCI Homeless Assistance Council at any given time.
- Each elected seat has a vote as exercised by a named individual, and each individual may exercise only one vote, as long as it doesn't represent a conflict of interest.
- With the exception of short-term vacancies, there will always be an odd number of WCI Homeless Assistance Council members. This will be managed through at-large seat availability.
- The WCI Homeless Assistance Council should represent a diverse set of service, population, and program interests.
- At-large seats provide flexibility in maintaining an odd number of WCI Homeless Assistance Council members, a minimum of 50% elected to appointed seats, while responding to community and strategic needs at any given time.

C. WCI Homeless Assistance Council Member Elections

Oversight: The Governance Committee is responsible for development and oversight of all elections. As such, they will:

- Send out calls for WCI Homeless Assistance Council nominees;
- Accept, verify and collect information (e.g., attendance record, bio) for nominations;

- Create and disseminate Council election ballots – dissemination will be per the voting eligibility list maintained by the Support Entity and described *under Continuum Member Composition & Voting Rights* in this Charter;
- Collect, compile and announce election results.

Process: The election process will include at least the following:

- New Continuum members will be invited and encouraged to join the Continuum in the first meeting of the year;
- Calls for nominations, vetting of nominations received and ballot announcement will happen between the first and second Continuum meetings of the year;
- Ballots will be arranged by the four (4) categories delineated in Section IIIB;
- Votes may be cast for up to the maximum number of seats within a category. Ballots that vote for more than the number of seats in a particular category will not be counted for that category only;
- Individuals receiving the highest votes for a given seat will be declared the winner;
- In the event of a tie vote for a specific seat, the individuals involved will flip a coin to determine the winner.

Process Review: The WCI Homeless Assistance Council will review this process at least every five (5) years to ensure it remains consistent with Continuum objectives and responsibilities.

D. WCI Homeless Assistance Council Officers

Officers: The WCI Homeless Assistance Council members vote in a Chair and Vice-Chair from its membership.

- The Chair conducts Council meetings.
- The Vice Chair serves in the Chair’s absence.

Terms: An officer serves for a two (2) year term.

Term Limits: An officer cannot serve for more than two (2) consecutive terms in the same role.

E. WCI Homeless Assistance Council Vacancy, Removal & Resignation

Vacancy: In the event of a vacancy, the members of the WCI Homeless Assistance Council will elect a successor to hold the vacant seat for the remainder of the term of the person vacating the seat. At the end of the term, a regular election will be held as described in this Charter.

Removal: Members of the WCI Homeless Assistance Council may remove WCI Homeless Assistance Council member who is absent for two (2) Council regularly scheduled meetings in any twelve-month period. Unexcused absence from special meetings will generally not be considered in this calculation but may be included as appropriate. WCI Homeless Assistance Council members may also be removed by a 3/4 vote of the WCI Homeless Assistance Council then-seated for cause including but not limited to:

- Failure to perform Council duties ;
- Failure to comply with this Charter and/or applicable policies;
- Engaging in conduct that constitutes a conflict of interest;
- Engaging in behavior that causes harm to the reputation of the Continuum.

Such seats will then be filled through the process described above under vacancies.

Resignation: Unless otherwise provided by written agreement, any member of the WCI Homeless Assistance Council may resign at any time by giving written notice to the Chair. Any such resignations will take effect at the time specified within the written notice or if the time be not specified therein upon its acceptance by the WCI Homeless Assistance Council.

F. WCI Homeless Assistance Council Meetings & Action

Frequency: The WCI Homeless Assistance Council will meet no less frequently than two (2) times per year at such times and places as the WCI Homeless Assistance Council will determine. The council utilizes online meeting/video conferencing capabilities due to the large geographical area covered. The Chair or Vice Chair may call a special meeting of the WCI Homeless Assistance Council provided it meets all notice and quorum requirements.

Open Meeting: Attendance at meetings of the WCI Homeless Assistance Council will be open to any interested person to observe.

Agendas: The WCI Homeless Assistance Council will disseminate agendas in advance of the meeting.

Notice: Thirty (30) day notice will be given for regularly scheduled meetings of the Continuum. Special meetings may be called in emergency situations with three (3) day notice. *See definition of Notice in Overview section of this Charter.*

Quorum: A number equal to a majority of the WCI Homeless Assistance Council members then-seated will constitute a quorum for the transaction of business at any meeting. No decision will be made unless a quorum is present. When board members are unable to attend online meetings; it is permissible for the absent board member to review the minutes, documents and submit questions via email to the council in order to vote on issues concerning the council after the scheduled council meeting. An email request for votes by proxy can then be called.

Decision-Making: The WCI Homeless Assistance Council makes decisions by majority.

Voting: Each elected member of the WCI Homeless Assistance Council is eligible to vote on decisions being made when present at the meetings. If a vote is necessary, all votes will be by voice, proxy via email, or ballot at the will of the majority of those in attendance at a meeting with a quorum represented. No member may vote on any item that presents a real or perceived conflict of interest.

Proxy: Proxy voting will be allowed. When a quorum is not present, detailed minutes will be sent out and an email vote will be requested from all parties.

Action Without a Meeting: The WCI Homeless Assistance Council may take an action without a meeting if that action, provided:

- The action is within its authority;
- Notice is provided;
- It is approved via email (or letter when email is unavailable);
- By a majority of all WCI Homeless Assistance Council then-seated members who are entitled to vote on the matter.

G. WCI Homeless Assistance Council Staffing

An employee of the Support Entity staffs the WCICCC Homeless Assistance Council and may be compensated by the CoC Planning Grant.

This staff member is responsible for:

- Recording minutes for the WCI Homeless Assistance Council;
- Meeting attendance;
- Length of Council member terms; and
- Ensuring WCI Homeless Assistance Council members receive all necessary information in the field and changes at the federal and state level that may influence or impact the Continuum as they may occur.

Support Entity staff may participate in discussion but may not vote.

IV. Committees, Working Groups & Task Forces

A. Formation & Composition

Purpose: The committees, working groups, and task forces are the action planning components of the system. In these bodies, strategies are developed, deepened and expanded into timed work plans. These groups may also be directly responsible for specific strategies or exploring options to solve particular concerns.

Formation: Standing committees are designated in this Charter. Ad hoc working groups or task forces may be formed and given specific responsibilities as needed by the WCI Homeless Assistance Council. All committee responsibilities apply to ad hoc groups, as well.

Membership: Committee membership may include any Continuum member. However, at least one (1) committee member must come from the WCI Homeless Assistance Council. Each committee will set its number and recruit members from the Continuum and larger community.

B. Standing Committees

The WCI Homeless Assistance Council has four (4) standing committees:

1. Governance
2. CoC Program Application
3. Homeless Prevention
4. Research & Evaluation

Committees are responsible for the following:

1. **Governance** – Annually reviewing, updating, and ensuring Continuum approval of all policies, including the Governance charter, code of conduct, conflict of interest and recusal policies, and the WCI Homeless Assistance Council election process; overseeing Continuum voting eligibility and elections; and coordinating capacity-building activities within the Continuum.
2. **CoC Program Application** – Overseeing of all application processes related to the HUD CoC Program: reviewing applications for funding, recommending project rank, developing technical assistance events, and answering questions related to the process.
3. **Homeless Prevention** – Oversee of the DHS application process related to the Illinois DHS Homeless Prevention Grant Application and the ESG application process related to the Illinois DHS ESG application: reviewing applications for funding, recommending project rank, developing technical assistance events, and answering questions related to the process.

4. **Research & Evaluation** – Oversight of the point-in-time count, conducting an annual gaps analysis of the homeless needs and services available, establishing system and project-level performance targets appropriate for population and program type, monitoring grant performance, developing a fair process for performance improvement, recommending action per that process, evaluating outcomes of projects funded under HUD (CoC and ESG Programs), and coordinating data collection and systems (including HMIS and Coordinated Entry).

C. Committee Leadership

Two (2) co-chairs and a secretary, as selected from within the committee, will coordinate each committee.

D. Other Committee Roles & Responsibilities

Each committee will be responsible for:

- Recruiting its members;
- Selecting committee leadership;
- Establishing its policies and procedures, and providing them to the WCI Homeless Assistance Council and Support Entity;
- Recording its minutes and attendance, and providing them to the Support Entity;
- Ensuring transparency of its process and meetings.

V. Continuum Policies

A. Code of Conduct, Conflict of Interest & Recusal

Members of the Continuum, Council, and its Committees will annually sign and abide by the Code of Conduct that is incorporated in this charter as Appendix C. Signed Code of Conduct forms will be held on file by the Support Entity.

No member of the Continuum will participate in the review, ranking, selection, or award of any grant funds in which they have a financial interest, or in which any member of their immediate family (such as parent, sibling, child, niece/nephew, or person with whom they cohabit) has a financial interest.

Members of the Continuum, Council and its Committees will disclose potential conflicts of interest that they may have regarding any matters that come before Continuum. Disclosure will be made in writing to the Collaborative Applicant prior to meetings or discussions on the matter in question. In the event that the Collaborative Applicant has a conflict of interest, they will notify the entire Council in writing prior to meetings or discussion on the matter in question.

Members will recuse themselves from any matter in which they may have a conflict of interest – abstaining from discussion and voting on the matter. The Council or Committee Chair may request the presence and participation of a conflicted party in discussions on a limited basis for the purpose of conducting meaningful business.

B. Non-Discrimination

The members, officers, committee members and contractors of the Continuum will be selected entirely on a nondiscriminatory basis with respect to race, color, national origin, age, disability, religion, gender, sexual orientation, or other federal, state, or locally protected group.

C. Committee Policies & Procedures

Committees will establish their own policies and procedures, consistent with this Charter, and provide them to the WCI Homeless Assistance Council and Support Entity for review.

D. Limited Authority

The Continuum is not a formal organization. As such:

- It has, and can have, no assets or liabilities;
- It cannot indemnify member or participant action;

- No member of the Continuum, WCI Homeless Assistance Council or its committees may contract, incur debt, or otherwise create an enforceable obligation for the Continuum, WCI Homeless Assistance Council or its committees.

Only the WCI Homeless Assistance Council may designate an individual or entity to speak for the Continuum or its components.

With the exception of removal policies in this Charter, any grievance related to the Continuum or CoC Program will follow HUD policies and contracts.

E. Policy Guidelines for HUD-Funded Programs (programs will be monitored for compliance)

1. Non- Discrimination: HUD-assisted and HUD-insured programs and services are required to include in their written policies and procedures language that the program cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. Housing and supportive services must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

2. VAWA: HUD-assisted and HUD-insured programs and services are required to include in their written policies/procedures provisions for advising victims of domestic violence of their rights under the Violence Against Women Act at program entry. Housing providers are required to include language in leases with landlords and subleases with program participants the **Notice of Occupancy Rights under the Violence Against Women Act**. Rights include landlords and housing providers cannot discriminate on the basis of a program participant's domestic violence situation.

3. Serving Victims of Domestic Violence: HUD-assisted and HUD-insured programs and services regardless of Victim Service Provider status, are required to be trained to provide and to provide fair and equal access for survivors, a safety plan protocols, trauma-informed and client-driven assessment tools in place at Coordinated Entry sites and subsequent housing placement.

4. Equal Access to Housing: HUD-assisted and HUD-insured programs and services are required to comply with the final rule on Equal Access to Housing in HUD Programs Regardless of Sexual orientation or Gender Identity. The final rule requires that recipients and subrecipients of HUD funding, as well as owners, operators, and managers of shelters, and other buildings and facilities and providers of services funded in whole or in part by any CPD program to grant equal access to such facilities, and other buildings and facilities, benefits, accommodations and services to individuals in accordance with the individual's gender

identity, and in a manner that affords equal access to the individual's family. HUD-funded projects are required to publicly post the Notice on Equal Access Rights and offer its publication in a manner that effectively communicates to persons with disabilities and those with limited English proficiency.

5. Fair Housing Equal Opportunity: HUD-assisted and HUD-insured programs and services are required to provide information on the rights and remedies available under Federal, state and local fair housing and civil rights laws and offer its publication in a manner that effectively communicates to persons with disabilities and those with limited English proficiency.

6. Limited English Proficiency Plan: HUD-assisted and HUD-insured programs and services are required to have a written LEP plan that effectively communicates to persons with disabilities and those with limited English proficiency.

7. Notice CPD-16-11 Prioritizing Persons Experiencing Chronic

Homelessness: HUD-assisted Permanent Supportive Housing programs are required to prioritize CH and other vulnerable homeless persons in accordance with HUD Notice CPD-16-11 found in Appendix E page 50 of charter.

8. Educational Assurance Policy: HUD-assisted and HUD-insured programs and services are required to have an Educational Assurance Policy that:

- Identify homeless families and inform them of their children's educational rights;
- Consider the educational needs of children when families are placed in emergency or transitional shelter and, to the maximum extent practicable, place families with children as close to possible to their school of origin;
- Establish policies and practices that are consistent with and do not restrict the exercise of homeless students' educational rights; and
- Designating a staff person to ensure that homeless children are enrolled in school and connected to services within the community

9. Discharge Planning: HUD-assisted and HUD-insured programs and services are required to coordinate with foster care, health care, mental health care, and correctional facilities on discharge planning to ensure those who are discharged from those systems of care are not released directly to the streets, emergency, shelters, or other homeless assistance programs.

10. Housing First and Low Barriers: PSH, RRH and TH that receive HUD CoC funding are required to follow a housing first case management approach and have low barriers to program entry.

VI. Appointed Entities

A. Process

Except as otherwise specified in this section, the process for entity appointment will be as follows:

- Specific performance expectations for each appointment will be outlined in MOUs;
- The WCI Homeless Assistance Council will review appointments based on performance each year;
- The Continuum will (re)certify appointments and issue new MOUs based on WCI Homeless Assistance Council recommendation every five (5) years ;
- Appointed entity relationships may be terminated upon mutual agreement or for cause with a vote of 75% of the then-seated WCI Homeless Assistance Council.

A broad description of each appointment is provided in this section of the Charter.

B. Collaborative Applicant

For the purposes of the annual HUD NOFA application and the management of CoC Program planning grants, the Continuum must designate a grant recipient to be the Collaborative Applicant as defined by 24 CFR 578 Subpart B. The Collaborative Applicant is responsible for working with the Council to ensure that all activities of the Continuum are in compliance with HUD mandates and this governance charter. The Collaborative Applicant may be compensated by the CoC Planning grant for activities pertaining to the CoC application or the activities can be used as in-kind services toward match or a combination of both. Examples of CoC activities are preparing the CoC application and all supporting documents; preparing the Ranking/Review materials for the CoC Competition Committee; preparing the CoC Priority Listing; and participating in the Consolidated Plan with the Illinois Housing Development Authority.

The Collaborative Applicant is the only entity that may:

- Apply for grants from HUD on behalf of the Continuum; and
- Apply for and receive CoC Program planning funds on behalf of the Continuum.

Additional responsibilities the Collaborative Applicant must do or assign to another CoC member, include:

- Serve as liaison with HUD regional office for CoC;
- Collect and submit annual housing inventory chart and point-in-time reports;
- Coordinate HUD NOFA oversight and management;
- Complete CoC administration duties;
- Participate in state's consolidated planning process; and

- Work with the Support Entity on CoC communication activities, such as coordinating implementation of goals related to community awareness, public policy, advocacy, education, partnership development, CoC communications (internal and external), and related strategies.

The Collaborative Applicant will be chosen by the WCI Homeless Assistance Council annually prior to the release of the HUD NOFA and accepted by majority vote of then-seated Council members.

C. HMIS Lead

YWCA of Quincy has been designated as the Continuum HMIS Lead. The HMIS Lead ensures all HMIS activities are carried out in accordance with the HEARTH Act. Staff of the HMIS are compensated by the HMIS grant awarded to and administered by the YWCA.

HMIS Lead roles outlined in the definitions of this Charter and its MOU/Agency Partner Agreement are incorporated into this Charter. Specific responsibilities include:

- Ensures compliance with HUD HMIS Standards and all other applicable laws;
- Maintains HMIS system security and confidentiality;
- Prepares the HUD HMIS section Consolidated Application;
- Provide training and support to ensure appropriate system use, data entry, data reporting, and data security and confidentiality;
- Ensure software interface by negotiating and monitoring the contract with software vendor including hosting agreements, configuration of network and security layers, anti-virus protection for server configuration, system backup and disaster recovery;
- Provide HMIS administration ensuring full implementation of the relevant COC policies and procedures in collaboration with the Research & Evaluation Committee;
- Ensure data collection and reporting for quality and completeness;
- Submit an annual data quality plan in accordance with HUD regulations;
- Ensure all program data are collected in adherence to the HUD HMIS Data Standards and local additional requirements;
- Generate quarterly APR and Universal Data Element reports for all HUD-funded programs;
- Generate reports for the CoC Collaborative Applicant and Research & Evaluation Committee.

HMIS policies and procedures will be reviewed and updated on an annual basis in accordance with HMIS data standards and HEARTH Act. The policies and procedures can be accessed through the Support Entity and the Continuum website.

D. Support Entity

The YWCA of Quincy has been designated as the Support Entity for the Continuum. Support Entity roles outlined in the definitions of this Charter and its MOU are incorporated into this Charter. The Support Entity has the staff and skills to coordinate Continuum members as well as its WCI Homeless Assistance Council and committees. The Support Entity maybe compensated for activities with CoC Planning grant funds; use activities as in-kind match; or a combination of both.

Specific responsibilities include:

- Staffing WCI Assistance Council meetings and four major standing committee meetings;
- Assist in collecting and submitting annual housing inventory chart and point-in-time reports;
- Submitting the annual housing assessment report to HUD's Homeless Data Exchange;
- Assist with grant coordination of entities involved and reporting requirements for Illinois Department of Human Services' ESG Program;
- Assist with grant writing coordination entities involved in the Illinois Department of Human Services Homeless Prevention grant;
- Assist with grant writing coordination of entities involved in the U.S. Department of Housing Continuum of Care grant;
- Maintaining CoC Website;
- Acting as WCICCC's HMIS staff;
- Work with the Collaborative Applicant on CoC communication activities, such as coordinating implementation of goals related to community awareness, public policy, advocacy, education, partnership development, CoC communications (internal and external), and related strategies;
- Provide technical assistance and training, as requested; and
- Provide homeless research, as requested.

VII. General Provisions

A. Operating Year

The operating year of the Continuum will commence on January 1st of each calendar year and end on the 31st day of December of said calendar year.

B. Annual Document Review

The WCI Homeless Assistance Council will review this Charter annually to ensure it remains consistent with HUD's COC Program requirements as well as Continuum objectives and responsibilities.

C. Record Keeping

Proceedings of all Continuum, WCI Homeless Assistance Council and committee meetings are documented in minutes.

- Minutes of meetings are circulated to members of the relevant body and approved at the subsequent meeting;
- The Support Entity is responsible for recording minutes for bi-annual meetings of the Continuum and WCI Homeless Assistance Council meetings;
- Committees are responsible for selecting a Secretary, recording their own minutes, and providing to the Support Entity for record keeping; and
- Minutes for all bodies will be disseminated by the Support Entity upon request.

The Support Entity will be the holder of all Continuum, WCI Homeless Assistance Council and committee documentation and records.

D. Amendments

The members of the Continuum will have the power to adopt, amend, or repeal the provisions of this Governance Charter by a two-thirds (2/3) vote of the membership present at any meeting where such proposed action has been described in the notice of the meeting.

Appendix A. Responsibilities of the Continuum (Interim Rule – 24 CRF 578.7)

Sec. 578.7 Responsibilities of the Continuum of Care.

(a) Operate the Continuum of Care. The Continuum of Care must:

- (1) Hold meetings of the full membership, with published agendas, at least semi-annually;
- (2) Make an invitation for new members to join publicly available within the geographic at least annually;
- (3) Adopt and follow a written process to select a Council to act on behalf of the Continuum of Care. The process must be reviewed, updated, and approved by the Continuum at least once every 5 years;
- (4) Appoint additional committees, subcommittees, or workgroups;
- (5) In consultation with the Collaborative Applicant and the HMIS Lead, develop, follow, and update annually a governance charter, which will include all procedures and policies needed to comply with subpart B of this part and with HMIS requirements as prescribed by HUD; and a code of conduct and recusal process for the Council, its chair(s), and any person acting on behalf of the Council;
- (6) Consult with recipients and subrecipients to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers;
- (7) Evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program, and report to HUD;
- (8) In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and operate either a centralized or coordinated entry system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. The Continuum must develop a specific policy to guide the operation of the centralized or coordinated entry system on how its system will address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from nonvictim service providers. This system must comply with any requirements established by HUD by Notice.
- (9) In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:

(i) Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part;

(ii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;

(iii) Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;

(iv) Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;

(v) Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and

(vi) Where the Continuum is designated a high-performing community, as described in subpart G of this part, policies and procedures set forth in 24 CFR 576.400(e)(3)(vi), (e)(3)(vii), (e)(3)(viii), and

(e)(3)(ix).

(b) Designating and operating an HMIS. The Continuum of Care must:

(1) Designate a single Homeless Management Information System (HMIS) for the geographic area;

(2) Designate an eligible applicant to manage the Continuum's HMIS, which will be known as the HMIS Lead;

(3) Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS.

(4) Ensure consistent participation of recipients and subrecipients in the HMIS; and

(5) Ensure the HMIS is administered in compliance with requirements prescribed by HUD.

(c) Continuum of Care planning. The Continuum must develop a plan that includes:

(1) Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. At a minimum, such system encompasses the following:

(i) Outreach, engagement, and assessment;

(ii) Shelter, housing, and supportive services;

(iii) Prevention strategies.

(2) Planning for and conducting, at least biennially, a point-in-time count of homeless persons within the geographic area that meets the following requirements:

(i) Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons.

(ii) Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons.

(iii) Other requirements established by HUD by Notice.

(3) Conducting an annual gaps analysis of the homeless needs and services available within the geographic area;

(4) Providing information required to complete the Consolidated Plan(s) within the Continuum's geographic area;

(5) Consulting with State and local government Emergency Solutions Grants program recipients within the Continuum's geographic area on the plan for allocating Emergency Solutions Grants program funds and reporting on and evaluating the performance of Emergency Solutions Grants program recipients and subrecipients.

Appendix B. Definitions

At risk of homelessness

- A. An individual or family who:
1. Has an annual income below 30% of median family income for the area, as determined by HUD;
 2. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the Homeless definition in this §; and
 3. Meets one of the following conditions:
 - a. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - b. Is living in the home of another because of economic hardship;
 - c. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance;
 - d. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
 - e. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than 2 persons, or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - f. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
- B. A child or youth who does not qualify as "homeless" under this §, but qualifies as "homeless" under §387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), §637(11) of the Head Start Act (42 U.S.C. 9832(11)), §41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), §330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), §3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or §17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
- C. A child or youth who does not qualify as "homeless" under this §, but qualifies as "homeless" under §725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Centralized or Coordinated Entry System

Means a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated entry system covers the geographic

area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.

Chronically homeless

- A. An individual who:
 - 1. Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - 2. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 1 year or on at least 4 separate occasions in the last 3 years; and
 - 3. Can be diagnosed with 1 or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in §102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;
- B. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
- C. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

CoC Program

The CoC (Continuum of Care) program is the funding program of HUD authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act as amended (42 U.S.C. 11371 et seq).

CoC Program Grantee (Recipient) and Sub-recipient

The CoC Program Grantee is the “recipient” as used by HUD and means an applicant that signs a grant agreement with HUD. Sub-recipient means a private nonprofit organization, State, local government, or instrumentality of State or local government that receives a sub-grant from the recipient to carry out a project.

Code of Federal Regulations (CFR)

A codification of the general and permanent rules published in the Federal Register by the Executive departments and agencies the U.S. federal government.

Collaborative Applicant

The YWCA of Quincy has been designated the Collaborative Applicant, effective 2012 grant application cycle.

Means the eligible applicant that has been designated by the Continuum of Care to apply for a grant for Continuum of Care planning funds under this part on behalf of the Continuum.

Committees, working groups and task forces

The committees, working groups, and task forces are the action planning components of the CoC system. In these bodies, strategies are developed, deepened and expanded into timed work plans. These groups may also be directly responsible for specific strategies or exploring options to solve particular concerns.

Consolidated plan

Means the HUD-approved plan developed in accordance with 24 CFR 91.

The West Central Illinois CoC falls under the State of Illinois Consolidated Plan which the Illinois Housing Development Authority coordinates the process.

The Continuum (Continuum of Care)

The name of this body will be the West Central Illinois Continuum of Care Consortium (the Continuum). This has been defined in two ways:

1. Means the group organized to carry out the responsibilities required under this part and that is composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate. (24 CFR §578.3)
2. Means the group composed of representatives of relevant organizations, which generally includes [\[list as in first definition\]](#) that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area. (24 CFR §576.2)

Continuum Member

Those individuals and entities meeting the composition and eligibility standards of the Continuum as set forth in this Charter.

Eligible applicant

Means a private nonprofit organization, State, local government, or instrumentality of State and local government.

Emergency shelter

Means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.

Emergency Solutions Grants (ESG)

Means the grants provided under 24 CFR part 576.

ESG Lead Applicant

Means the entity designated by the Continuum of Care to apply to the Illinois Department of Commerce and Economic Opportunity’s Emergency Solutions Grant Program on behalf of two or more service providers when organizations need to apply together, in a region, in order to meet minimum funding request thresholds. The Lead Applicant will require memorandum of understanding or some other type of agreement with the other service providers (sub-recipients) involved in the grant request.

ESG Sub-recipients

Are the entities that are recipients of Emergency Solution Grant Program funds from Lead Applicants. The Emergency Solution Grant Program funds come from the Illinois Department of Commerce and Economic Opportunity.

High-performing community (HPC)

Means a Continuum of Care that meets the standards in subpart E of this part and has been designated as a high-performing community by HUD. To qualify as an HPC, a Continuum must demonstrate through:

- A. Reliable data generated by the Continuum of Care’s HMIS that it meets all of the following standards:
 - 1. Mean length of homelessness. Either the mean length of episode of homelessness within the Continuum’s geographic area is fewer than 20 days, or the mean length of episodes of homelessness for individuals or families in similar circumstances was reduced by at least 10% from the preceding federal fiscal year.
 - 2. Reduced recidivism. Of individuals and families who leave homelessness, less than 5% become homeless again at any time within the next 2 years; or the percentage of individuals and families in similar circumstances who become homeless again within 2 years after leaving homelessness was decreased by at least 20% from the preceding federal fiscal year.
 - 3. HMIS coverage. The Continuum’s HMIS must have a bed coverage rate of 80% and a service volume coverage rate of 80% as calculated in accordance with HUD’s HMIS requirements.

4. Serving families and youth. With respect to Continuums that served homeless families and youth defined as homeless under other federal statutes in paragraph (3) of the definition of homeless in §576.2:
 - a. 95% of those families and youth did not become homeless again within a 2 year period following termination of assistance; or
 - b. 85% of those families achieved independent living in permanent housing for at least 2 years following termination of assistance.
- B. Reliable data generated from sources other than the Continuum's HMIS that is provided in a narrative or other form prescribed by HUD that it meets both of the following standards:
 1. Community action. All the metropolitan cities and counties within the Continuum's geographic area have a comprehensive outreach plan, including specific steps for identifying homeless persons and referring them to appropriate housing and services in that geographic area.
 2. Renewing HPC status. If the Continuum was designated an HPC in the previous federal fiscal year and used Continuum of Care grant funds for activities described under §578.71, that such activities were effective at reducing the number of individuals and families who became homeless in that community.

Homeless

Means:

- A. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 1. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 2. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); or
 3. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- B. An individual or family who will imminently lose their primary nighttime residence, provided that:
 1. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 2. No subsequent residence has been identified; and
 3. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
- C. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 1. Are defined as homeless under §387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), §637 of the Head Start Act (42 U.S.C. 9832), §41403 of the Violence Against Women

Act of 1994 (42 U.S.C. 14043e--2), §330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), §3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), §17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or §725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 3. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 4. Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
- D. Any individual or family who:
1. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 2. Has no other residence; and
 3. Lacks the resources or support networks, e.g., family, friends, and faith based or other social networks, to obtain other permanent housing.

Homeless Management Information System (HMIS)

Means the information system designated by the Continuum of Care to comply with the HMIS requirements prescribed by HUD.

[ServicePoint by Bowman Systems is the HMIS.](#)

HMIS Lead

[YWCA of Quincy has been designated the HMIS Lead.](#)

Means the entity designated by the Continuum of Care in accordance with this part to operate the Continuum's HMIS on its behalf.

Homelessness prevention

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in § 576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the “at risk of homelessness” definition, or who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in § 576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in § 576.105, the short-term and medium-term rental assistance requirements in § 576.106, and the written standards and procedures established under § 576.400.

Permanent housing

Means community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid rehousing. To be permanent housing, the program participant must be the tenant on a lease for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause.

Permanent supportive housing

Means permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

Point-in-time count

Means a count of sheltered and unsheltered homeless persons carried out on one night in the last 10 calendar days of January or at such other time as required by HUD.

Private nonprofit organization

Means an organization:

1. No part of the net earnings of which inure to the benefit of any member, founder, contributor, or individual;
2. That has a voluntary Council;
3. That has a functioning accounting system that is operated in accordance with generally accepted accounting principles, or has designated a fiscal agent that will maintain a functioning accounting system for the organization in accordance with generally accepted accounting principles; and
4. That practices nondiscrimination in the provision of assistance.

A private nonprofit organization does not include governmental organizations, such as public housing agencies.

Program participant

Means an individual (including an unaccompanied youth) or family who is assisted with Continuum of Care program funds.

Project

Means a group of eligible activities, such as HMIS costs, identified as a project in an application to HUD for Continuum of Care funds and includes a structure (or structures) that is (are) acquired, rehabilitated, constructed, or leased with assistance provided under this part or with respect to which HUD provides rental assistance or annual payments for operating costs, or supportive services under this subtitle.

Population/service hub

Means a geographic area where clients seek services. The three largest population/service hubs in the Continuum are Quincy, Jacksonville, and Macomb.

Relevant organizations

Relevant organizations include nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans and homeless and formerly homeless individuals.

Safe haven

Means, for the purpose of defining chronically homeless, supportive housing that meets the following:

1. Serves hard to reach homeless persons with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services;
2. Provides 24-hour residence for eligible persons for an unspecified period;
3. Has an overnight capacity limited to 25 or fewer persons; and
4. Provides low-demand services and referrals for the residents.

Support Entity

Support Entity is the coordination hub responsible for:

- Providing logistical support for Continuum responsibilities as in Interim Rule – 24 CFR §578.7

- Convening and facilitating the WCI Homeless Assistance Council and key working groups
- Monitoring strategic coherence across efforts
- Coordinating communication within the Continuum
- Managing collective data systems and information distribution
- Mobilizing planning efforts that frame future community-wide plans and their revision
- Stewarding resources for collective impact as appropriate

As such, the support is not a “lead” entity, but rather performs the roles of advocate, planning consultant, project manager, and logistics staff – though always free to delegate elements of its responsibility to appropriate Continuum members and/or contracted support as appropriate.

Transitional housing

Means housing, where all program participants have signed a lease or occupancy agreement, the purpose of which is to facilitate the movement of homeless individuals and families into permanent housing within 24 months or such longer period as HUD determines necessary. The program participant must have a lease or occupancy agreement for a term of at least one month that ends in 24 months and cannot be extended.

Unified Funding Agency (UFA)

Means an eligible applicant selected by the Continuum of Care to apply for a grant for the entire Continuum, which has the capacity to carry out the duties in §578.11(b), which is approved by HUD and to which HUD awards a grant. [No UFA has been designated. The WCI Homeless Assistance Council will work with the Collaborative Applicant to apply for UFA status if the WCI Homeless Assistance Council or Continuum as a whole sees fit to do so.](#)

Victim service provider

Means a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs.

WCI Homeless Assistance Council (Governing Council)

The governing Council established to act on behalf of the Continuum using the process established as a requirement by §578.7(a)(3) and in compliance with the conflict-of-interest requirements at §578.95(b). The Council must: (1) be representative of the relevant organizations and of projects serving homeless subpopulations; and (2) include at least one homeless or formerly homeless individual.

Appendix C. Code of Conduct

West Central Illinois Continuum of Care Homeless Assistance Council Code of Conduct

The West Central Illinois Continuum of Care Homeless Assistance Council has adopted a Code of Conduct to guide its members and staff in their conduct when acting on behalf of the CoC. At a minimum, CoC members and staff shall:

- Abide by the governing documents and policies of the WCICCC Homeless Assistance Council's Governance Charter.
- Comply with applicable federal, state, and local laws, regulations, and fiduciary responsibilities.
- Not accept commissions, gifts, payments, loans, or other items of value from anyone who has or may seek some benefit from the CoC.
- Act at all times in accordance with the highest ethical standards and in the best interest of the CoC, its members, program participants, and constituents.
- Respect the confidentiality of sensitive information about the CoC, its members, program participants, and staff.
- Respect the uniqueness and intrinsic worth of every individual, and treat all people with dignity, respect, and compassion.
- Develop, administer, and advocate for policies and procedures that foster fair, consistent, and equitable treatment for all.

Non-Discrimination Policy

IL519 West Central Illinois Continuum of Care does not discriminate against any person because of race, creed, sexual orientation, familial status, disability, color, religion or gender in any services or CoC membership. All CoC and ESG-funded programs and services are required to include in their written policies and procedures a non-discrimination statement that aligns with the CoC's Statement of Non-Discrimination.

Rules Regarding Conflicts of Interest

Council members, committee members, and other CoC agents and employees must abide by the following rules in order to avoid conflicts of interest and promote public confidence in the integrity of the CoC and its processes. Failure to honor these rules will be grounds for removal from the Council and any of its committees.

- Council members, committee members, and other CoC agents and employees may not participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefit to Any organization that they or a member of their immediate family represents; or any organization from which they or a member of their immediate family derives income, services, or anything of value.
- Whenever CoC Board members, committee members, agents, employees, or any of their immediate family members have a financial interest or any other personal interest in a matter

coming before the Council or one of its committees, they must fully disclose the nature of the interest; and withdraw from discussing or voting on the matter.

- With regard to participation in proposal reviews, proposals assigned to each reviewer are sent before the review meeting takes place. Before reviewers score project applications, reviewers are asked to determine whether a conflict of interest exists with any application that has been assigned. If it is determined that a conflict or the appearance of a conflict exists, the application shall be assigned to another reviewer and a replacement application shall be provided. All reviewers shall be required to sign a conflict of interest document.

Disclosure

At the beginning of every meeting of the Council, Committee, or Subcommittee, members must disclose if they have any conflicts of interest or potential conflicts of interest regarding any business included in the meeting's agenda.

Abstention from Decision-Making

Any matter in which Council or committee members have an actual or potential conflict of interest will be decided only by a vote of disinterested individuals. In addition, the minutes of any meeting at which such a vote is conducted must reflect the disclosure of interested Council and committee members' abstention.

Rules Regarding Confidentiality

All Council members, committee members, and other CoC agents and employees shall respect the confidentiality of sensitive information about the CoC, its members, program participants, and staff.

With regard to project application reviews, adherence to confidentiality is critical to the integrity of the review process and the protection of reviewers who are evaluating project applications. Therefore, each individual who participates in the project application review process shall abide by the following confidentiality requirements before, during, and after the review process and when required to vote on funding/submission of funding requests:

- All information related to project applications shall be kept in strict confidence;
- Impressions or judgments concerning project applications shall not be discussed or shared with anyone prior to, during, or after the review committee's deliberations (exceptions: discussions with other review committee members during committee deliberations and discussions with the CoC Council);
- Project applications, as well as the ideas, concepts, methods, or techniques included in the applications shall be considered proprietary, and all rights thereby implied shall be respected;
- Project applications, in part or whole, shall not to be photocopied or electronic files shared except by CoC Council or staff for CoC for business purposes.

Reviewers shall adhere to the following requirements:

- Statements and notes of the reviewers shall not be shared with anyone outside the review committee;
- Discussions concerning any specific application shall be confined to the meetings;
- Proceedings of meetings shall be kept in strict confidence; and

- Proposals and review materials shall be left with the Support Entity or its delegates at the conclusion of the review session.

I acknowledge that I have received, read and understand the contents of this Code of Conduct and will abide by them accordingly.

Name

Date

Organization

Appendix D. Homeless Management Information System Roles and Responsibilities

West Central Illinois Continuum of Care Consortium (WCICCC) Homeless Management Information System (HMIS)

Policies and Procedures

Appendix D

Purpose of HMIS

The purpose of the WCICCC HMIS is to provide a robust and comprehensive system for collecting and disseminating information about persons experiencing homelessness and the homelessness service system in support of the WCICCC service area.

I. Roles and Responsibilities

1. **HMIS Lead** Ensures all HMIS activities are carried out in accordance with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act.
2. **Project Staffing** The YWCA of Quincy is the HMIS Lead Agency/ System Administrator and has the responsibility for coordination and administration of the HMIS and reports to the WCI Homeless Assistance Council. An alternate System Administrator from an agency other than the YWCA of Quincy will serve on the HMIS workgroup and if conflicts of interest arise that involve the YWCA of Quincy, will act as System Administrator to resolve the matter of conflict. The CoC Council will appoint the alternate System Administrator. The alternate System Administrator will receive the same training provided by the CoC as the System Administrator. Only one System Administrator will have admin rights in the HMIS and HDX at one given time.
3. **Contributory HMIS Organizations** Any agency, group, or other entity that has

completed an M O U / Agency Partner Agreement with the HMIS Lead or HMIS System Administrator is a Contributory HMIS Organization (CHO). All CHOs must abide by all policies and procedures outlined in this manual, which are subject to change. HMIS proposed policy and procedure changes must be submitted to HMIS Advisory workgroup for consideration. CHOs must complete a MOU/Agency Partner Agreement with the HMIS Administrator on an annual basis. CHOs with expired MOU/ Agency Partner Agreements may have their End User accounts locked or removed to maintain the security, confidentiality, and integrity of the system. CHOs are responsible for the conduct of their End Users and the security of End User Accounts.

4. **HMIS Advisory Workgroup** The HMIS Administrator or designee will convene a committee to advise the project's operations, policies, and procedures and provide feedback on a regular basis. The HMIS Administrator or designee will seek out particularly skilled individuals whose breadth and depth of expertise is well-suited to the project. At minimum the workgroup will consists of one CoC and one ESG grantee.

5. **HMIS End Users** CHO's designate individuals to access the system on their behalf, and use ServicePoint as their primary tool for client and service tracking, case management, and operational reporting.

There is no upper limit to the number of End Users each CHO may authorize, but HMIS Lead may assess participation fees to recover the cost of ServicePoint and System Administration fees.

All End Users, including HMIS staff, must complete an End User agreement with the HMIS System Administrator on an annual basis. End User accounts with expired End User Agreements may be locked or removed to maintain the security, confidentiality, and integrity of the system.

Appendix E. MOU/Agency Partner Agreement

AGENCY PARTNER AGREEMENT

West Central Illinois Continuum of Care (WCICCC) ServicePoint Client Information Management System

West Central Illinois Continuum of Care (WCICCC) ServicePoint is a client information system that provides a standardized assessment of consumer needs, creates individualized service plans and records the use of housing and services which communities can use to determine the utilization of services of participating agencies, identify gaps in the local service continuum and develop outcome measurements.

The signature of the Executive Director of the Partner Agency indicates agreement with the terms set forth before a WCICCC ServicePoint account can be established for the Agency.

The WCICCC is the primary coordinating Agency. The YWCA of Quincy shall be the system administrator.

In this Agreement, "Partner Agency" is an Agency participating in WCICCC ServicePoint, "Client" is a consumer of services, and "Agency" is the Agency named in this agreement.

I. Confidentiality

A. The Agency shall uphold relevant federal and state confidentiality regulation and laws that protect Client records and the Agency shall only release client records with written consent by the client, unless otherwise provided for in the regulations.

1. The Agency shall abide specifically by federal confidentiality regulations as contained in the Code of Federal Regulations, 42 CFR Part 2 regarding disclosure of alcohol and/or drug abuse records. In general terms, the federal rules prohibit the disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is not sufficient for this purpose. The Agency understands the federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patients.
2. The Agency shall provide a verbal explanation of the WCICCC ServicePoint database and the terms of consent and shall arrange for a qualified interpreter or translator in the event that an individual is not literate in English or has difficulty understanding the consent form.

3. The Agency shall not solicit or input information from Clients into the WCICCC ServicePoint database unless it is essential to provide services, or to conduct evaluation or research.
4. The Agency agrees not to release any confidential information received from the WCICCC ServicePoint database to any organization or individual without proper Client consent.
5. The Agency shall ensure that all staff, volunteers and other persons issued a User ID and password for WCICCC ServicePoint receives basic confidentiality training.
6. The Agency understands the file server, which will contain all Client information, including encrypted identifying Client information, will be located off-site.
7. The Agency shall maintain appropriate documentation of Client consent to participate in the WCICCC ServicePoint database.
8. The Agency shall not be denied access to Client data entered by the Agency. Partner Agencies are bound by all restrictions placed upon the data by the client of any Partner Agency. The Agency shall diligently record the WCICCC ServicePoint system all restrictions requested. The Agency shall not knowingly enter false or misleading data under any circumstances.
9. If this Agreement is terminated, the Agency and remaining Partner Agencies shall maintain their right to the use of all Client data previously entered by the terminating Partner Agency; this use is subject to any restrictions requested by the Client.
10. The Agency will utilize the WCICCC ServicePoint Client Consent/Information Release form as developed in conjunction and coordination with Partner Agencies, for all clients providing information for the WCICCC ServicePoint database. The Client Consent/Information Release form, once signed by the Client, authorizes Client data to be entered into the WCICCC ServicePoint database and authorizes information sharing with WCICCC ServicePoint Partner Agencies.
11. If a Client withdraws consent for release of information, the Agency remains responsible to ensure that Client's information unavailable to all other Partner Agencies.
12. The Agency shall keep signed copies of the Client Consent Form/Information Release forms for the WCICCC ServicePoint for a period of three years.

13. The Agency does not require or imply that services must be contingent upon a Client's participation in the WCICCC ServicePoint database. Services should be provided to Clients regardless of WCICCC ServicePoint participation provided the Clients would otherwise be eligible for the services.

II. WCICCC ServicePoint Use and Data Entry

- A. The Agency shall follow, comply with and enforce the User Policy, Responsibility Statement & Code of Ethics (Attachment A). Modifications to the User Policy, Responsibility Statement & Code of Ethics shall be established in consultation with Partner Agencies and may be modified as needed for the purpose of the smooth and efficient operation of the WCICCC ServicePoint system. The Agency will announce approved modification in a timely manner via System News in WCICCC ServicePoint.
 1. The Agency shall only enter individual in the WCICCC ServicePoint database that exist as Clients under the Agency's jurisdiction. The Agency shall not misrepresent its Client base in the WCICCC ServicePoint database by entering known, inaccurate information.
 2. The Agency shall use Client information in the WCICCC ServicePoint database, as provided to the Agency or Partner Agencies, to assist the Agency in providing adequate and appropriate services to the Client.
- B. The Agency shall enter information into the WCICCC ServicePoint database in real-time data entry which is defined as immediate data entry upon seeing a Client, or within five business days.
- C. The Agency will not alter information in the WCICCC ServicePoint database that is entered by another Agency with known, inaccurate information. (i.e. Agency will not purposefully enter inaccurate information to over-ride information entered by another Agency).
- D. The Agency shall not include profanity or offensive language in the WCICCC ServicePoint database.
- E. The agency shall utilize the WCICCC ServicePoint database for business purposes only.
- F. The WCICCC and YWCA of Quincy will provide initial training and periodic updates to that training to Agency Staff system users on the WCICCC ServicePoint software.
- G. The WCICCC and YWCA of Quincy will be available for technical assistance within reason (i.e. troubleshooting and report generation).

- H. The transmission of material in violation of any federal or state regulations is prohibited. This includes, but is not limited to, copyright material, material legally judged to be threatening or obscene, and material considered protected by trade secret.
- I. The Agency shall not use the WCICCC ServicePoint database with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.
- J. Based on the number of User Licenses, the Agency shall pay the scheduled participation fee and an annual scheduled support in each year of participation.

III. Reports

- A. The Agency shall retain access to identifying and statistical data on the Clients it serves.
- B. The Agency's access to data on Clients it does not serve shall be limited to non-identifying and statistical data.
- C. The Agency may make aggregate data available to other entities for funding or planning purposes pertaining to providing services to homeless persons.
- D. The Agency will use only unidentified, aggregate WCICCC ServicePoint data for homeless policy and planning decisions, in preparing federal, state or local applications for homelessness funding, to demonstrate the need for and effectiveness of programs and to obtain a system-wide view of program utilization in the state.

IV. Proprietary Rights of Bowman Internet System

- A. The Agency shall not give nor share assigned passwords and access codes of the WCICCC ServicePoint database with any other Agency, business, or individual.
- B. The Agency shall not cause in any manner, or way, corruption of the WCICCC ServicePoint database in any manner.

V. Terms and Conditions

- A. Neither the WCICCC nor the Agency shall transfer or assign any rights or obligations without the written consent of the other party.
- B. This Agreement shall be in-force until revoked in writing by either party provided funding is available.

C. This Agreement may be terminated with 30 days written notice.

SIGNATURE OF EXECUTIVE DIRECTOR _____ DATE _____

AGENCY NAME _____ FEIN _____

STREET ADDRESS _____

CITY _____ STATE _____ ZIP CODE _____

MAILING ADDRESS—LEAVE BLANK IF SAME AS ABOVE

STREET ADDRESS _____

CITY _____ STATE _____ ZIP CODE _____

Note: Forms should be signed by the Agency Administrator and then mailed to HMIS System Administrator YWCA of Quincy, 639 York Street, Suite 202 Quincy, IL 62301. Questions should be directed to Mary Muehlenfeld, WCICCC's HMIS Coordinator, 1.800.526.9943 or 309.298.2968, la-sutton@wiu.edu

Revised: **12 12 2014**

Appendix F. West Central Illinois Continuum of Care Homeless Assistance Council Permanent Supportive Housing Written Standards & Chronic Prioritization

Permanent Supportive Housing (PSH) programs provide community-based housing and supportive services, without a predetermined length of stay, to assist homeless persons with a disability to live independently.

STANDARD: The project will provide safe, affordable housing that meets participants' needs in accordance with HUD guidelines for permanent supportive housing programs.

CRITERIA:

1. In providing or arranging for housing, the program considers the needs of the individual or family experiencing homelessness.
2. The program provides assistance in accessing suitable housing.
3. The program may provide assistance with moving costs.
4. The program signs occupancy agreements or leases (or subleases) with all program participants residing in housing.
5. The program enters into an occupancy agreement or lease agreement (or sublease) with program participant for a term of at least once year, which is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month. Assistance may be extended as stated in 24 CFR 578.79.
6. For programs where regulations require individuals and families residing in permanent supportive housing to pay occupancy charges or rent, occupancy charges and rent may not exceed those specified in 24 CFR 578.77.

ELIGIBILITY CRITERIA: In order to be served in a CoC-funded PSH program (individuals or family households) all adult program participants must meet the following program eligibility requirements:

- Be homeless as defined by HUD : Individuals and families defined as Homeless under the following categories are eligible for assistance in PSH projects:

- Category 1 – Literally Homeless
- Category 4 – Fleeing/Attempting to Flee DV

PSH projects have the following additional NOFA limitations on eligibility within Category 1:

- Individuals and Families coming from TH must have originally come from the streets or emergency shelter
- Individuals and Families must also have an individual family member with a disability. Projects that are dedicated chronically homeless projects, including those that were originally funded as Samaritan Bonus Initiative Projects must continue to serve chronically homeless persons exclusively.

- Be 18 years old or older; and
- Be a member of a zero to low-income household.

Priority is given to chronically homeless individuals and families as defined by HUD. Recipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all circumstances in determining whether termination is appropriate. The WCICCC adopts HUD's Notice CPD-16-11, Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing, issued in July 2016. The following will be used in determining placement in CoC-funded PSH.

D. Key Terms

1. Housing First. A model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions for entry (such as sobriety or a minimum income threshold). HUD encourages all recipients of CoC Program-funded PSH to follow a Housing First approach to the maximum extent practicable.

2. Chronically Homeless. The definition of "chronically homeless", as stated in Definition of Chronically Homeless final rule is:

(a) A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

i. lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

ii. Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;

(b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering the facility;

(c) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.

3. Severity of Service Needs. This Notice refers to persons who have been identified as having the most severe service needs.

(a) For the purposes of this Notice, this means an individual for whom at least one of the following is true:

i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or

ii. Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.

iii. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.

iv. When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high-need, high cost beneficiaries.

(b) Severe service needs as defined in paragraphs i.-iv. above should be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool and process and should be documented in a program participant's case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see 24 C.F.R. § 5.105(a).

II. Dedication and Prioritization of Permanent Supportive Housing Strategies to Increase Number of PSH Beds Available for Chronically Homeless Persons

A. Increase the number of CoC Program-funded PSH beds that are dedicated to persons experiencing chronic homelessness.

Dedicated PSH beds are those which are required through the project's grant agreement to only be used to house persons experiencing chronic homelessness unless there are no persons within the CoC that meet that criteria. If there are no persons within the CoC's geographic area that meet the definition of chronically homeless at a point in which a dedicated PSH bed is vacant, the recipient may then follow the order of priority for non-dedicated PSH established in this Notice, if it has been adopted into the CoC's written standards. The bed will continue to be a dedicated bed, however, so when that bed becomes vacant again it must be used to house a chronically homeless person unless there are still no persons who meet that criterion within the CoC's geographic area at that time. These PSH beds are also reported as "CH Beds" on a CoC's Housing Inventory Count (HIC).

B. Prioritize non-dedicated PSH beds for use by persons experiencing chronic homelessness.

Prioritization means implementing an admissions preference for chronically homeless persons for CoC Program-funded PSH beds. During the CoC Program competition project applicants for CoC Program-funded PSH indicate the number of non-dedicated beds that will be prioritized for use by persons experiencing chronic homelessness during the operating year of that grant, when awarded. These projects are then required to prioritize chronically homeless persons in their non-dedicated CoC Program-funded PSH beds for the applicable operating year as the project application is incorporated into the grant agreement. All recipients of non-dedicated CoC Program-funded PSH are encouraged to change the designation of their PSH to dedicated, however, at a minimum are encouraged to prioritize the chronically homeless as beds become vacant to the maximum extent practicable, until there are no persons within the CoC's geographic area who meet that criteria. Projects located in CoCs where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified area. For example, if a Balance of State CoC has chosen to divide the CoC into six distinct regions for purposes of planning and housing and service

delivery, each region would only be expected to prioritize assistance within its specified geographic area.

The number of non-dedicated beds designated as being prioritized for the chronically homeless may be increased at any time during the operating year and may occur without an amendment to the grant agreement.

III. Order of Priority in CoC Program-funded Permanent Supportive Housing

The definition of chronically homeless included in the final rule on “Defining Chronically Homeless”, which was published on December 4, 2015 and went into effect on January 15, 2016, requires an individual or head of household to have a disability and to have been living in a place not meant for human habitation, in an emergency shelter, or in a safe haven for at least 12 months either continuously or cumulatively over a period of at least 4 occasions in the last 3 years. HUD encourages all CoCs adopt into their written standards the following orders of priority for all CoC Program-funded PSH. CoCs that adopted the orders of priority established in Notice CPD-16-11, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Where a CoC has chosen to not incorporate HUD’s recommended orders of priority into their written standards, recipients of CoC Program-funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC’s written standards.

As a reminder, recipients of CoC Program-funded PSH are required to prioritize otherwise eligible households in a nondiscriminatory manner. Program implementation, including any prioritization policies, must be implemented consistent with the nondiscrimination provisions of the Federal civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II or III of the Americans with Disabilities Act, as applicable. For example, while it is acceptable to prioritize based on level of need for the type of assistance being offered, prioritizing based on specific disabilities would not be consistent with fair housing requirements or program regulations.

A. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Dedicated or Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

1. CoCs are strongly encouraged to revise their written standards to include an order of priority, determined by the CoC, for CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness that is based on the length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the individual’s or family’s service needs. Recipients of CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness would be required to follow that order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.

2. Where there are no chronically homeless individuals and families within the CoC’s geographic area, CoCs and recipients of CoC Program-funded PSH are encouraged to follow the order of priority in Section III.B. of this Notice. For projects located in CoC’s where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified sub-CoC area.

3. Recipients of CoC Program-funded PSH should follow the order of priority above while also considering the goals and any identified target populations served by the project. For example, a CoC Program-funded PSH project that is permitted to target homeless persons with a serious mental illness should follow the order of priority under Section III.A.1. of this Notice to the extent in which persons with serious mental illness meet the criteria. In this example, if there were no persons with a serious mental illness that also met the criteria of chronically homeless within the CoC's geographic area, the recipient should follow the order of priority under Section III.B for persons with a serious mental illness.

4. Recipients must exercise due diligence when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients of CoC Program-funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. CoC Program-funded PSH providers are encouraged to follow a Housing First approach to the maximum extent practicable. Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

B. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Not Dedicated or Not Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

1. CoCs are strongly encouraged to revise their written standards to include the following order of priority for non-dedicated and non-prioritized PSH beds. If adopted into the CoCs written standards, recipients of CoC Program-funded PSH that is not dedicated or prioritized for the chronically homeless would be required to follow this order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.

(a) First Priority—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.

(b) Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as

having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

(c) Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

(d) Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing.

1. An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.
2. 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. For example, non-dedicated or non-prioritized CoC Program-funded PSH that is permitted to target youth experiencing homelessness should follow the order of priority under Section III.B.1. of this Notice, as adopted by the CoC, to the extent in which youth meet the stated criteria.
3. Recipients must exercise due diligence when conducting outreach and assessment to ensure that persons are prioritized for assistance based on their length of time homeless and the severity of their needs following the order of priority described in this Notice, and as adopted by the CoC. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH (see FAQ 1895). Recipients of CoC Program-funded PSH are encouraged to follow a Housing First approach to the maximum extent practicable. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these individuals and families must continue to be prioritized until they are housed.

IV. Using Coordinated Entry and a Standardized Assessment Process to Determine Eligibility and Establish a Prioritized Waiting List

A. Coordinated Entry Requirement

Provisions at 24 CFR 578.7(a)(8) requires that each CoC, in consultation with recipients of Emergency Solutions Grants (ESG) program funds within the CoC's geographic area, establish and operate either a centralized or coordinated entry system (referred to in this Notice as coordinated entry or coordinated entry process) that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. CoCs that adopt the order of priority in Section III of this Notice into the CoC's written standards are strongly encouraged to use a coordinated entry process to ensure that there is a single prioritized list for all CoC Program-funded PSH within the CoC. The Coordinated Entry Policy Brief, provides recommended criteria for a quality coordinated entry process and standardized assessment tool and process. Under no circumstances shall the order of priority be based upon diagnosis or disability type, but instead on the length of time an individual or family has been experiencing homelessness and the severity of needs of an individual or family.

B. Written Standards for Creation of a Single Prioritized List for PSH

CoCs are also encouraged to include in their policies and procedures governing their coordinated entry system a requirement that all CoC Program-funded PSH accept referrals only through a single prioritized list that is created through the CoCs coordinated entry process, which should also be informed by the CoCs street outreach. Adopting this into the CoC's policies and procedures for coordinated entry would further ensure that CoC Program-funded PSH is being used most effectively, which is one of the goals in this Notice. The single prioritized list should be updated frequently to reflect the most up-to-date and real-time data as possible.

C. Standardized Assessment Tool Requirement

CoCs must utilize a standardized assessment tool, in accordance with 24 CFR 578.3, or process. The Coordinated Entry Policy Brief, provides recommended criteria for a quality coordinated entry process and standardized assessment tool.

D. Nondiscrimination Requirements

CoCs and recipients of CoC Program-funded PSH must continue to comply with the nondiscrimination provisions of Federal civil rights laws, including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II or III of the Americans with Disabilities Act, as applicable. See 24 C.F.R. § 5.105(a).

V. Recordkeeping Recommendations for CoCs that have Adopted the Orders of Priority in this Notice

24 CFR 578.103(a)(4) outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, HUD expects that where CoCs have adopted the orders of priority in Section III. of this Notice into their written standards. The CoC, as well as recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

A. Evidence of Severe Service Needs. Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in Section I.D.3. of this Notice using data-driven methods such as an administrative data match or through the use of a standardized

assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.

B. Evidence that the Recipient is Following the CoC’s Written Standards for Prioritizing Assistance. Recipients must follow the CoC’s written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC’s adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC’s revised written standards have been incorporated into the recipient’s intake procedures and that the recipient is following its intake procedures when accepting new program participants into the project.

C. Evidence that there are no Households Meeting Higher Order of Priority within CoC’s Geographic Area.

(a) When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC’s geographic area – or for those CoCs that implement a sub-CoC 3planning and housing and service delivery approach, the smaller defined geographic area within the CoC’s geographic area – at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.

(b) When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC’s geographic area - or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC’s geographic area - that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC’s geographic area that meet a higher order of priority.

Prioritization Policy and Procedure Reviewed August 21, 2016 and approved by WCICCC Homeless Assistance Council on September 5, 2016.

Certified as approved by WCICCC Steering Committee, on _____

Myndi Boyd, Council Member and Governance Committee Chair

Revised on 8/25/2016 by Governance Committee and approved by WCI Homeless Assistance Council on _____.

