

## **DuPage County Continuum of Care Governance Charter**

*Adopted by the Leadership Committee of the Continuum of Care on December 12, 2012*

*Updated December 7, 2016*

### Establishment of the Continuum of Care

1. The DuPage County Homeless Continuum of Care (CoC) has been established in accordance with Bylaws adopted on April 24, 2009, as shown on Exhibit A. An amendment to the Bylaws on November 18, 2016 created the DuPage County Continuum of Care (CoC) name change.
2. The CoC consists of representatives from relevant organizations within DuPage County, Illinois. Such 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. Relevant organizations within the Chicago Metropolitan area work alongside and in collaboration with the CoC, as problems, issues, and solutions do not stop or start at the DuPage County borders. Current members of the CoC are shown on Exhibit B.
3. The CoC has established a Leadership Committee to act on behalf of the CoC as its board. The Leadership Committee is representative of the relevant organizations and of projects serving homeless subpopulations and includes at least one homeless or formerly homeless individual. The current Leadership Committee is shown on Exhibit C. On November 18, 2016, the CoC Bylaws were amended to include the CoC name change, the addition of a nondiscrimination statement, the highlighting of the Conflict of Interest and Code of Conduct/Recusal Process for the Board, its Chair(s) and any person acting on behalf of the board; and the addition of Voting by Majority Rules and Electronic Voting. Board members shall annually execute a Conflict of Interest and Code of Conduct and Recusal document in the form shown on Exhibit D.
4. In accordance with the regulations at 24 CFR 578.5(c), the CoC shall have until August 29, 2014 to comply with all requirements of 24 CFR 578 Subpart B and which the CoC has met all requirements and is in full compliance.

### Responsibilities of the Continuum of Care

- A. Operation of the Continuum of Care
  1. The CoC holds meetings of the full membership, with published agendas, at least semi-annually.

2. The CoC has an open invitation for new members to join. It is publicly available on the CoC website: <https://dupagehomeless.org/>
3. The CoC has adopted and follows a written process to select the Leadership Committee, which acts as the board of the CoC and acts on behalf of the CoC. That process is in the adopted Bylaws of the CoC shown on Exhibit A and was last reviewed and adopted on November 30, 2012. That process must be reviewed, updated, and approved by the CoC again on or before November 29, 2017.
4. The CoC has appointed additional committees. A summary of those committees is shown in Exhibit E. The organizational structure of the CoC is shown in Exhibit F.
5. This governance charter has been developed in consultation with the collaborative applicant, which is DuPage County Community Services, and the Homeless Management Information System (HMIS) Lead, which is DuPage County Community Services. This governance charter shall be followed by the CoC, the collaborative applicant, and the HMIS lead; it shall be updated annually; and it contains all policies and procedures needed to comply with 24 CFR 578 Subpart B and with the HMIS requirements as prescribed by the U.S. Department of Housing and Urban Development (HUD). A code of conduct and recusal process is stated in the Conflict of Interest document shown on Exhibit D.
6. The CoC has consulted with recipients and subrecipients to establish performance targets appropriate for population and program types, it monitors recipients and subrecipient performance, it evaluates outcomes, and it takes action against poor performers. This is accomplished through meetings of the various committees, the application process for recipients of funding, and the ranking and scoring of applications by the grants funding committee based on criteria that examine outcomes and performance.
7. The CoC will evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program and will report such evaluations to HUD in the fashion and format required by HUD from time to time. Emergency Solutions Grants (ESG) shall be awarded by DuPage County through its Community Services Department after consultation with the CoC on the criteria for funding and approval by the Grants Funding Committee on proposed awards.
8. The CoC, in consultation with DuPage County through its Community Services Department (which is the recipient of ESG funds), has established a coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. A policy has been developed to guide the operation of the coordinated assessment system on how it addresses 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 non-victim service providers. The following committees are responsible for development of this policy: Needs Assessment, HMIS, and Homeless Prevention Providers. A copy of this policy is attached (Exhibit G)

9. The CoC, in consultation with DuPage County through its Community Services Department (which is the recipient of ESG funds), will establish and consistently follow written standards for providing Continuum of Care assistance. The Needs Assessment Committee, Homelessness Prevention Providers Committee and the DuPage County Community Development Commission are responsible for the development of these policies and procedures.

B. Designating and Operating an HMIS.

1. The CoC HMIS is operated by DuPage County Community Services.
2. The HMIS lead is DuPage County Community Services.
3. The HMIS Committee, with assistance from HMIS staff, is responsible to review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS. Such plans are then approved by the Leadership Committee. Last date of adoption for each is as follows:

Privacy Plan: Adopted by HMIS on 10/17/12; updated on 12/16/15 & 01/15/16

Security Plan: Adopted on 10/30/09 as part of the HMIS Standard Operating Procedures (SOP) and updated on 12/16/15 & 01/11/17

Data Quality Plan: Previously adopted by HMIS Committee; formally adopted by the CoC on 01/15/16 & 01/11/17

Roles and Responsibilities: adopted by the CoC on 12/16/15; updated 01/11/17

The SOP is reviewed annually by the HMIS Policy Committee.

4. Consistent participation in HMIS by recipients and subrecipients is a requirement of receiving CoC or ESG funding. Such participation is assisted through provision of training opportunities and oversight of HMIS staff and the HMIS Committee.
5. The CoC ensures that HMIS is administered in compliance with the requirements prescribed by HUD by assigning HMIS Lead staff members to review regulations and compliance requirements and report on needed actions to the HMIS Committee.

C. Continuum of Care Planning

1. The CoC has developed a plan that coordinates the implementation of a housing and service system within DuPage that attempts to meet the needs of homeless individuals (including unaccompanied youth) and families.  
The plan was updated in 2008. The Executive Summary and the Blueprint for Moving Forward can be found at the following link on the CoC website:  
<http://dupagehomeless.org/strategies/dupage-county-plan-to-end-homelessness/>

At a minimum, such a system encompasses the following:

- a) Outreach, engagement and assessment
  - b) Shelter, housing and supportive services
  - c) Prevention strategies
2. The CoC plans for and conducts biennially a point-in-time count of homeless persons within DuPage County. Homeless persons who are living in a place not designed or ordinarily used as regular sleeping accommodation for humans are counted as unsheltered homeless persons. Persons living in emergency shelters and transitional housing projects are counted as sheltered homeless persons. Other requirements promulgated by HUD by Notice are followed. The Street Count Committee is responsible for the biennial count.
  3. The CoC conducts an annual gaps analysis of the homeless needs and services available within the geographic area by utilizing information from HMIS, updating its bed counts, utilizing data from the point-in-time counts, and provider survey.
  4. The CoC provides information to DuPage County Community Development Commission (CDC) to update the Consolidated Plan for the DuPage County Consortium, as well as information for the Consolidated Annual Performance and Evaluation Report.
  5. The CoC consults with the CDC, the entity which administers ESG funds on behalf of the recipient, DuPage County, on the plan for allocating ESG program funds and reporting on and evaluating the performance of ESG program subrecipients. The Grants Funding Committee sets the criteria for award of grant funds and the CDC runs an application process on behalf of the CoC. Funding recommendations and application evaluations are then returned to the Grants Funding Committee for action. Recommendations of the Grants Funding Committee are then sent to the Leadership Committee for final approval. During the grant administration process, the CDC receives quarterly progress reports from each subrecipient. Such reports are analyzed against the outcome targets set for each project.

### Preparing an Application for Funds

#### A. Process. The CoC:

1. Designs, operates, and follows a collaborative process for the development of applications and approves the submission of applications in response to a NOFA published by HUD. The CoC follows a strict calendar and process each year that requires a business plan for all projects that is initially presented to the Needs Assessment Committee. Agencies work collaboratively with each other and with the HMIS Lead to prepare information for submittal to HUD. The submission of applications, initially

presented at the Needs Assessment Committee, is then reviewed by Grants Funding Committee and approved by the Leadership Committee.

2. Priorities for funding are determined based on needs established by the Needs Assessment Committee, the annual gap analysis, consistency with the CoC plan to end homelessness, and priorities established by HUD in the NOFA. In accordance with the Bylaws, it is the role of the Grants Funding Committee to develop funding criteria, application procedures, and ranking procedures. Based on these procedures and an analysis of outcomes, the Grants Funding Committee may also recommend re-allocation or funding cuts to the Leadership Committee. Also in accordance with the Bylaws, the Leadership Committee is authorized to make all final decisions pertaining to allocation of funds and may also determine the need for re-allocation or funding cuts based on analysis of data and outcomes. Once it has been determined that re-allocation or funding cuts is in the best interest of the CoC, a representative or representatives of the Leadership Committee will communicate with the agency whose project is being re-allocated or cut to discuss how the reallocation will occur and the timing of any reallocation or project funding cut.
3. The application is submitted by DuPage County Community Services, as collaborative applicant, on behalf of the CoC.
  - B. Responsibility. The CoC retains all of its responsibilities, even though it has designated a collaborative applicant. The collaborative applicant is DuPage County Community Services that operates as the lead agency of the CoC.

Unified Funding Agency

The CoC has selected DuPage County, through its Community Services Department, to make application as the Unified Funding Agency, should this opportunity be available with funding to support the function.

Amendment to this Governance Charter

This governance charter shall be reviewed at least annually, but may be amended and updated at any duly called meeting of the Leadership Committee. It is anticipated that multiple amendments will be made over the next two years as HUD issues further guidance on CoC requirements.

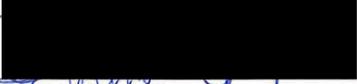
DuPage County Homeless Continuum of Care

By:   
Chair of Leadership Committee

Date: 9/5/17

By:   
Collaborative Applicant

Date: 9/5/17

By:   
HMIS Lead

Date: 9/5/17

## Exhibit A



**DuPage County Continuum of Care –  
Bylaws April 24, 2009  
Amended 11-20-2009  
Amended 11-12-2010  
Amended 11-30-2012  
Amended 04-17-2015  
Amended 11-18-2016**

### **Article I: Name**

The name of this organization shall be the DuPage County Continuum of Care.

### **Article II: Purpose**

The purpose of the DuPage County Continuum of Care is to develop and support effective strategies to end homelessness in DuPage County and to promote full accessibility to safe, affordable housing and comprehensive, integrated support services for DuPage residents faced with homelessness.

### **Article III: Membership of the Continuum**

#### **III. 1 General Membership**

Membership in the DuPage County Continuum of Care (CoC) is open to ensure community-wide commitment to ending and preventing homelessness. Members of the CoC approve at-large Leadership Committee members and, within the Committee framework, impact and positively contribute to Continuum goals.

The Continuum General Membership shall consist of two categories of members:

(1) Organizational Members including representatives from nonprofit organizations, social services providers, behavioral health agencies, organizations that serve Veterans, victim services providers, government entities, elected officials, financial institutions, businesses, housing developers, public housing agencies, faith based organizations, health care providers, neighborhood associations, educators, and (2) Individual Members, including persons with lived experience of homelessness, or other interested individuals. Individuals may not comprise more than 10% of the General Membership.

Continuum General Membership is limited to those residing and/or doing business in DuPage County, Illinois. Approval as a Member of the Continuum requires formal adoption of the Continuum's Memorandum of Understanding by the organization for Organizational Membership or by the individual for Individual Membership and approval by the Leadership Committee of the Continuum. The process for recruitment and selection of members for CoC

membership will be transparent and inclusive. The members, officers, and persons served by the Continuum shall be selected entirely on a non-discriminatory basis with respect to age, sex, race, ethnicity, religion, sexual orientation, disability, and national origin in accordance with all state and federal regulations. If denied, an applicant may appeal in writing to the Appeals Committee of the Continuum in accordance with Article VIII of these Bylaws.

### **III. 2 Rights and Responsibilities**

Each Member is afforded one full vote on any decision put to a vote. Organizational Members may designate different Organizational Representatives to serve on Continuum Committees. Changes in Organizational Representatives must be submitted in writing to the Leadership Committee of the Continuum. Organizational Representatives may vote on behalf of the Organizational Member.

Member Responsibilities:

1. Review Governance Charter and all amendments at least annually
2. Attend biannual Full Continuum meetings
3. Actively participate on Committees as appropriate

Inactive Members: Periodically, the CoC shall review its membership list to identify inactive members. An “Inactive Member” shall be defined as an individual or organization where the voting member, alternate voting member or an organizational representative have missed two consecutive Full Continuum meetings or have attended fewer than 75% of the regular Committee meetings that occurred within the last 12 months. Prior to removal, a designee of the CoC shall attempt to contact inactive members before confirming their removal. The Leadership Committee may opt through a simple majority vote to reinstate membership and voting privileges for inactive members who have missed meetings due to illness, crisis situations, or other compelling and unavoidable circumstances.

### **IV. Conflict of Interest**

All Organizational Representatives of the Continuum are required to make known any conflicts of interest regarding any matter before the Continuum or the committees on which they serve. Members are prohibited from voting on matters pertaining to allocation of funds to any and all organizations that they represent, are employed by or on whose Board of Directors they serve. Following recusal, if the number of remaining voting Members falls below a quorum, there must be at least three remaining voting Members to take action. Should there be less than three voting Members the matter must be forwarded to the Leadership Committee for consideration. To further avoid any appearance of conflict of interest, voting Members with conflicts, at the discretion of the Committee chairs, will be asked to refrain from participating in discussion relating to the above. Additionally, all voting Members of the Leadership Committee are required to submit a signed Code of Conduct and DuPage County CoC Conflict of Interest Policy statement annually.

## **Article IV: Organizational Structure**

The general management of the Continuum is exercised by the designated Lead Organization as indicated in official documents submitted to HUD by the Leadership Committee of the Continuum. Decisions pertaining to the management and administrative functions of the Continuum including staffing and contracting for consulting services shall be made by the designated representative of the Lead Organization, with review and oversight by the Leadership Committee.

### **IV. 1 Committees**

The Continuum consists of seven standing committees:

- 1) Leadership Committee
- 2) Community Outreach Committee
- 3) Grants/Funding Committee
- 4) Needs Assessment Committee
- 5) Homeless Management Information System (HMIS) Policy Committee
- 6) Homeless Prevention Providers Committee
- 7) Appeals Committee

Each committee may establish, as needed, working sub-committees to conduct specific tasks of the committee. The purpose and responsibilities of each committee shall be as follows:

1) Leadership Committee: The Leadership Committee functions as the leadership of the Continuum and shall be chaired by the designated representative of the Lead Organization. Its membership shall consist of the representative of the Lead Organization, the chairpersons of each of the other standing committees with the exception of the Appeals Committee and at least five, but not more than ten at large Continuum Members. At least one member of the Leadership committee must be a current or formerly homeless person. The at-large committee members will be nominated by the Leadership Committee and ratified by the General Membership for a two year term. This committee meets at least quarterly.

The Leadership Committee oversees the Continuum, coordinates the implementation of the Plan to End Homelessness, coordinates the development of homeless services, establishes policies and procedures of the Continuum, provides direction and approval to each committee's tasks and activities and approves new Members of the Continuum and its committees. On behalf of the Continuum, the Leadership Committee is authorized to make all final decisions pertaining to pursuit, contract, and allocation of funds; and the designation of the Lead Organization. The Leadership Committee manages Continuum wide communications, including twice yearly full membership meetings.

2) Community Outreach Committee: The role of the Community Outreach Committee is to oversee membership and build inclusiveness, to promote community awareness of homelessness, to develop awareness and support of the Plan to End Homelessness, to promote discharge policies that prevent homelessness, to ensure enrollment in mainstream benefits, increase income

through employment/benefits, and to promote outreach and engagement of unsheltered homeless persons. Committee membership is comprised from the Continuum's General Membership. Membership of the Committee is open, with approval of the Leadership Committee, and no more than one person, or 10% of the membership, whichever is greater shall be comprised of Individual Members of the Continuum.

3) Grants/Funding Committee: The role of the Grants/Funding Committee is to develop funding criteria, application procedures, and ranking procedures for grant opportunities including but not limited to: the HUD Continuum grants, IL Dept. of Human Services (IDHS) Homeless Prevention funds, and DuPage County CDBG grants; to coordinate the overall grant application processes and ensure equal access for all Continuum members; to successfully complete funding applications to obtain the maximum amount available for homeless services and housing; to support optimal funding of the services and housing necessary to assist all homeless persons to achieve stable housing. Committee membership is comprised from the Continuum's General Membership. Membership of the Committee is open, with approval of the Leadership Committee, and no more than one person, or 10% of the membership, whichever is greater, shall be comprised of Individual Members of the Continuum.

4) Needs Assessment Committee: The role of the Needs Assessment Committee is to provide ongoing assessment of homeless needs and resources in order to determine the most current gaps between the existing services and the highest service needs; to set priorities for filling gaps in homeless services; to develop and implement procedures for conducting the annual homeless housing and services inventory and the bi-annual count of unsheltered and sheltered homeless persons; to coordinate information with other human service and housing needs assessments; and to support the full implementation of the HMIS system as an effective resource for accurate point in time needs assessment data. Committee membership is comprised from the Continuum's General Membership. Membership of the Committee is open, with approval of the Leadership Committee, and no more than one person, or 10% of the membership, whichever is greater, shall be comprised of Individual Members of the Continuum.

5) Homeless Management Information System (HMIS) Policy Committee: The role of the HMIS Policy Committee is to develop, maintain, and update the homeless information system including the development and implementation of data protocols, reporting, policies, and problem solving measures. Committee membership is comprised of system users from the Continuum's General Membership. Membership of the Committee is open, with approval of the Leadership Committee, and no more one person, or than 10% of the membership, whichever is greater, shall be comprised of Individual Members of the Continuum.

6) Homeless Prevention Providers Committee: The role of the Homeless Prevention Providers Committee is to share, evaluate, expand or obtain information, services, and resources pertaining to the prevention of homelessness; to assure efficient and effective disbursement of homeless prevention funds; and to develop and adhere to coordinated strategy and procedures. Committee membership is comprised from the Continuum's General Membership. Membership of the Committee is open, with approval of the Leadership Committee, and no more than one person, or 10% of the membership, whichever is greater, shall be comprised of Individual Members of the Continuum.

7) Appeals Committee: The role of the Appeals Committee is to resolve any decisions made by the Continuum or any of its committees following a written request for an appeal. The Appeals Committee consists of the Vice-Chairpersons of the Community Outreach Committee, the Grants/Funding Committee, and the Needs Assessment Committee. After conducting an appeal hearing, the Appeals Committee will submit their findings and meet with the Leadership Committee for a final resolution. The procedure governing appeals is set out in Article VIII of these Bylaws.

#### **IV. 2 Committee Chairs**

The Chair of each committee shall be chosen by its membership and chairs shall serve two-year terms with no limit on re-election. Any member of the Continuum may apply to be chair of a committee. The Chair of each committee shall be responsible for presiding at all meetings of his/her committee. The Chair is responsible for ensuring accurate minutes are recorded of all meetings and submitted to the Leadership Committee or their designee, and that the work and recommendations of the Committee are appropriately communicated to the Leadership Committee of the Continuum. A Chair may be removed by a 2/3 vote of the Leadership Committee if it is deemed to be in the best interests of the Continuum. The Chairs of each standing committee, with the exception of the Appeals Committee, shall serve on the Continuum Leadership.

#### **IV. 3 Committee Vice-Chairs**

Each Committee will select a Vice-Chair to serve in the absence of the Committee Chair at meetings. If there is a resignation of the Chair, the Vice-Chair will assume the Chair Committee position for the remainder of that term. At the next regular meeting an election will be held to select a new Vice-Chair. The Vice Chair of the Community Outreach Committee, the Grants/Funding Committee and the Needs Assessment Committee will serve as the Continuum's Appeals Committee. Vice-Chairs will be selected every two years with no limits on re-election.

#### **Article V: Continuum and Committee Meetings**

There shall be two meetings each year for the full General Membership. Committees meet quarterly at a minimum. Attendance and minutes are recorded for all meetings and are the responsibility of the committee chair. All committee meetings are open to the general membership for attendance. An annual Continuum calendar of all meetings is completed each July and distributed to all members of the Continuum. It is also available on the Continuum website.

#### **Article VI: Meeting Notice and Agenda**

Not less than seven (7) days' advance notice of general or committee meetings shall be given to all relevant members. The notice will be provided electronically by the designee of the Leadership Committee. Such notices shall contain the time, place, proposed agenda of the meeting, and any pertinent supporting materials.

## **Article VII: Conduct of Meetings**

Parliamentary discretion for the conduct of meetings shall be vested in the Chair. Meeting procedures shall provide an opportunity for all to be heard on any given issue and for the efficient conduct of business. All Members are required to act in accordance with the signed Memorandum of Understanding.

### **VII.1 Voting by Organizational Members**

When needed, the Chair of the Continuum may call for a General Continuum vote, or a Committee Chair may call for a Committee vote. In voting, each Member, whether organizational Member or individual Member is afforded one vote regardless of the number of Organizational Representatives. All decisions made at the Committee level, and those which require recommendation for further action by a higher level Committee, will be recorded in Committee minutes.

### **VII.2 Voting by Majority Vote Rules**

Action will be taken by a majority of the votes cast by those present and authorized to vote during a properly called meeting.

### **VII. 3 Electronic Voting**

Electronic voting is permissible according to the discretion of the Chair. Wherever possible, voting shall occur during the CoC meetings. However, electronic voting (soliciting, casting, and collecting of votes) will be acceptable. The Chair will be responsible for maintaining records of the electronic voting.

## **Article VIII: Appeals Procedure**

Any Member of the Continuum, or prospective Member in the case of denial of an application for Membership, who has a grievance over any decisions, actions, or procedures of the Continuum or any of its committees shall be entitled to file an appeal before the Appeals Committee in writing. The appellant presenting his/her grievance shall be given a designated time to state the basis of the appeal. Any person of the appellant's choosing may be present at the appeal hearing. After the appellant has been heard, the Appeals Committee shall move into executive session to confer and decide its ruling on the appeal by majority vote. The decision of the Appeals Committee will be submitted to the Leadership Committee for review and reconsideration. A vote will be taken by members of the Leadership Committee and the Appeals Committee to resolve. A final decision will be made based on a majority vote. The appellant shall be given a written statement of the final decision and reasons therefore within sixty (60) days of receipt of the appeal. The decision shall be considered final.

**Article IX: Amendments**

These Bylaws may be amended by the affirmative vote of 2/3 of the Continuum present at a duly called general membership meeting thereof, if the notice of such meeting has contained a copy of the proposed amendment(s).

**Article X: Effective Date**

These Bylaws will become effective upon adoption by 2/3 vote of the Continuum membership present.

## Exhibit B

<b>Name of Organization</b>
360 Youth Services
Adventist Health System
Bluestem Housing Partners
Bridges Communities
Catholic Charities, Diocese of Joliet
CHAD - Community Housing Association of DuPage
City of Naperville
City of Wheaton
College of DuPage
DuPage Foundation
DuPage County - Dept. of Community Services
DuPage County - Dept. of Probation & Court Services
DuPage Health Coalition dba Access DuPage
DuPage County - Psychological Services
DuPage County - Veterans Assistance Commission
DuPage County Community Development Commission
DuPage County Health Department
DuPage Federation on Human Services Reform
DuPage Habitat for Humanity
DuPage Homeownership Center
DuPage Housing Authority
DuPage PADS
DuPage Workforce Development Division
DuPage Senior Citizens Council
DuPage YWCA
Family Focus
Family Shelter Service
Hamdard Center for Health & Human Services
HCS Family Services
Hope Fair Housing
JUST of DuPage
League of Women Voters DuPage
Loaves and Fishes Community Services
Love Christian Clearinghouse
Metropolitan Family Services
Midwest Shelter for Homeless Veterans
NAMI of DuPage County

Northern Illinois Food Bank
Outreach Community Ministries
Parkview Community Church
People's Resource Center
Prairie State Legal Services Inc.
Ray Graham
Regional Office of Education DuPage
Salvation Army - Suburban Service Extension Dept.
Saret Charitable Fund
Senior Home Sharing, Inc.
Serenity House Counseling Services, Inc.
Topfer Family Foundation
United Way DuPage Area
United Way of Metropolitan Chicago
Wayne Township
World Relief

Exhibit C

<b>DuPage County Continuum of Care Leadership</b>	
Leader	Mary Keating Director DuPage County Community Services
Continuum Consultant	Peg White Lijewski President OMR, Inc.
<b>COMMITTEE</b>	<b>CHAIRPERSON</b>
Community Outreach	Carol Simler President & CEO DuPage Pads
Grants Funding	Lisa Howe Compliance Officer/ Quality Control Manager DuPage Housing Authority
Needs Assessment	Tonya Latson Social Services Director People's Resource Center
Homeless Prevention	Maria McTarnaghan Associate Director CARES Programs Loaves & Fishes Community Services
HMIS	Will Moeller Manager of Intake Services Bridge Communities
<b>AT LARGE MEMBERS</b>	
Community Funder	Barb Szczepaniak Vice President for Programs DuPage Foundation
Veteran and Former Lived Experience Representative	Bob Adams, LCSW Co-Founder Midwest Shelter for Homeless Veterans
Health Care	Kara Murphy President DuPage Health Coalition
Mental Health	Randi Luna Assistant Director, Residential Services DuPage County Health Department
Court Services/Substance Abuse	Jean Solon Probation Officer Supervisor, Mental Health Team, DuPage County Probation
Domestic Violence/Victims Services	Judie Caribeaux Executive Director Family Shelter Service
Education	Heather Britton McKinney-Vento Advocate Regional Office of Education
Faith Community/Service Provider	Amy Palumbo Director of Community Services North Catholic Charities, Diocese of Joliet

Legal Aid	<b>Kerry O'Brien</b> Staff Attorney Prairie State Legal Services
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## Exhibit D



### DuPage County Continuum of Care Conflict of Interest Policy and Code of Conduct

This Conflict of Interest Policy is executed as of the date written below in accordance with 24 CFR 578.95(b). The Leadership Committee of the DuPage County Continuum of Care acts as the board for the Continuum of Care. No board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.

As a member of the Leadership Committee, I understand that I must recuse myself from any discussion or decision concerning the award of a grant or other financial benefits to the organization that I represent. The process for such recusal shall be to publicly announce at the meeting that I have a conflict regarding the matter under discussion or being considered for a decision, to leave the room during the discussion or decision-making process, and to request that the minutes of the meeting clearly reflect my announced conflict of interest and the fact that I was not present during the discussion or decision-making process.

I will further follow the Conflict of Interest Policy promulgated by the Internal Revenue Service for nonprofit corporations, as stated below, with the understanding that the DuPage County Continuum of Care is equivalent to a "Corporation," as applicable.

I do hereby acknowledge that I have received a copy of this document.

Acknowledged this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

By: \_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name



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I do hereby acknowledge that I have received a copy of this document.

Acknowledged this 7<sup>th</sup> day of DECEMBER, 20 16.

By:

  
Signature

MARY A. KEATING  
Printed Name



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Acknowledged this 7<sup>th</sup> day of December 2016.

By:

  
Signature

CAROL SIMLETZ

Printed Name



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I do hereby acknowledge that I have received a copy of this document.

Acknowledged this 7<sup>th</sup> day of December, 2016.

By:

A black rectangular box redacting the signature of the individual.

Signature

LISA A. HOWE.

Printed Name



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Signature

Tonya LATSON

Printed Name



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Acknowledged this 22 day of May, 2017.

By:



Signature

Maria McTarnaghan

Printed Name



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Acknowledged this 7 day of December, 2016.

By:

  
Signature

William P Moeller  
Printed Name



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By:

  
Signature

Barbara Szczepaniak  
Printed Name



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Acknowledged this 7<sup>TH</sup> day of DECEMBER, 2016.

By:

[Redacted Signature]

Signature

ROBERT M. ADAMS

Printed Name



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By:

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Signature

Kara R Murphy

Printed Name



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By:

  
Signature

Randi Luna

Printed Name



**DuPage County Continuum of Care  
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Acknowledged this 13 day of December, 2016.

By:   
Signature  
JEAN A. SOLON  
Printed Name



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Acknowledged this 9th day of December, 20 16.

By:



Signature

Judie Caribeaux

Printed Name



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By:

A black rectangular box redacting the signature of the individual.

Signature

Heather Britton

Printed Name



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Acknowledged this 12 day of December, 2016.

By \_\_\_\_\_

Signature

Amy PALUMBO

Printed Name



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By:



Signature

KERRY O'BRIEN

Printed Name

## **Exhibit E**

### **DuPage Continuum of Care Committees**

The DuPage County Continuum of Care consists of seven standing committees and a special committee that meets biennially for the purpose of the Point in Time Count of the Unsheltered Homeless in DuPage County:

- 1) **Leadership Committee**
- 2) **Community Outreach Committee**
- 3) **Grants Funding Committee**
- 4) **Needs Assessment Committee**
- 5) **Homeless Management Information System (HMIS) Users Committee**
- 6) **Homeless Prevention Providers Committee**
- 7) **Appeals Committee**
- 8) **Street Count Committee**

The purpose and responsibilities of each committee are as follows:

#### **LEADERSHIP COMMITTEE**

**PURPOSE** - The Leadership Committee functions as the leadership of the DuPage County Continuum of Care (CoC). The Leadership Committee functions as the Leadership of the CoC and shall be chaired by the designated representative of the Lead Organization. Its membership shall consist of the representative of the Lead Organization, the chairpersons of each of the other standing committees (with the exception of the Appeals Committee) and at least five but no more than ten At-Large Continuum Members. The At-Large Committee members will be nominated by the Leadership Committee and ratified by the General Membership for a two-year term. This committee meets at least quarterly for these purposes:

To coordinate the development of comprehensive Continuum of Care services for homeless persons in DuPage County. To establish and implement a Plan to End Homelessness. To establish the policies and procedures of the DuPage County Continuum of Care. To distribute limited resources in the most efficient and accountable manner. To have final accountability to all homeless consumers and members of the DuPage County Continuum of Care for the enhanced performance of the Continuum. To provide a forum for ongoing communication and coordinated efforts among all committees of the DuPage County Continuum of Care. To determine specific actions to be taken which will position the Continuum of Care for positive growth and development.

**RESPONSIBILITIES** - The Leadership Committee oversees the Continuum, coordinates the implementation of the Plan to End Homelessness, coordinates the development of homeless

services, establishes policies and procedures of the Continuum, provides direction and approval to each committee's tasks and activities and approves new Members of the Continuum and its committees. On behalf of the Continuum, the Leadership Committee is authorized to make all final decisions pertaining to pursuit, contract, and allocation of funds; and the designation of the Lead Organization. The Leadership Committee manages Continuum wide communications, including twice yearly full membership meetings. The DuPage County Community Services Director serves as liaison with the Executive Committee of the DuPage County Community Development Commission (CDC) and the Leadership Committee. This Executive Committee is informed of the activities of the DuPage Homeless Continuum on a regular basis.

- Assess and measure progress made in the Plan to End Homelessness regularly.
- Ongoing refinement of goals, outcomes and reporting on the Plan to End Homelessness.
- Provide final approval for all Community Development Block Grant Funds, Homeless Prevention funds and HUD Continuum funds.
- Review and take action on all requests regarding Continuum policy matters i.e., Ranking Criteria, Bylaws, Confidentiality and the HMIS, New Projects Review, Plan to End Homelessness, Needs Assessment procedures, etc.
- Have representation in the Regional Roundtable, a consortium made up of representatives from the eight Continuum of Care jurisdictions of northeast Illinois.
- Approve the recommended Chairperson for each Continuum Committee and all committee members.
- Meet at least quarterly to determine committee tasks and priorities and review progress/information.
- Share information from each committee with the full Continuum membership.
- Organize twice yearly meetings of entire Continuum membership.

## **COMMUNITY OUTREACH COMMITTEE**

**PURPOSE** - The role of the Community Outreach Committee is to oversee membership and build inclusiveness, to promote community awareness of homelessness, to develop awareness and support of the of both local and Federal plans to end homelessness, to promote discharge policies that prevent homelessness, to ensure enrollment in mainstream benefits, increase income through employment/benefits, and to promote outreach and engagement of unsheltered homeless persons. Committee membership is comprised from the Continuum's General Membership. Membership of the Committee is open, with approval of the Leadership Committee, and no more than one person, or 10% of the membership, whichever is greater shall be comprised of Individual Members of the Continuum. The committee meets at least quarterly for these purposes:

**RESPONSIBILITIES** - To oversee membership in the Continuum and build inclusiveness, to ensure that it includes representatives of nonprofit homeless service providers, state and local government agencies, public housing authorities, veteran's service organizations, businesses/business associations, faith based organizations, funders, law enforcement, medical, and homeless/formerly homeless persons. To promote community awareness of homelessness.

To develop awareness and build public support of both local and Federal plans to end homelessness. To promote discharge policies for persons leaving public systems such as jails, hospitals, mental health facilities, and the child welfare system that prevent them from becoming homeless. To ensure that all eligible persons have access to mainstream benefits, employment or other sources of income. To ensure that all homeless persons leaving DuPage services have a source of food, cash income, medical care, and a plan for appropriate housing. To have an outreach and engagement system in place for homeless persons who are not sheltered.

- Seek representation from different sectors for Continuum membership.
- Provide updated content for the DuPage CoC website describing the DuPage County homelessness issues and needs.
- Promote public awareness and support for homeless issues.
- Develop topics for the full membership meeting to present to the Leadership Committee.
- Provide an Annual Report to the DuPage County Board, updating progress on the local plan to end homelessness and support needed.

#### **GRANTS FUNDING COMMITTEE**

**PURPOSE** - The role of the Grants Funding Committee is to develop funding criteria, application procedures, and ranking procedures for grant opportunities including but not limited to: the HUD Continuum grants, state and federal Homeless Prevention funds, and DuPage County Community Development Block Grants; to coordinate the overall grant application processes and ensure equal access for all Continuum members; to successfully complete funding applications to obtain the maximum amount available for homeless services and housing; to support optimal funding of the services and housing necessary to assist all homeless persons to achieve stable housing. Committee membership is comprised from the Continuum's General Membership. Membership of the Committee is open, with approval of the Leadership Committee, and no more than one person, or 10% of the membership, whichever is greater, shall be comprised of Individual Members of the Continuum. The committee meets at least quarterly for these purposes:

**RESPONSIBILITIES** - To develop funding criteria, application procedures, and ranking procedures for the HUD Continuum grants, state and federal Homeless Prevention funds, and DuPage County Community Development Block Grants. To evaluate and prioritize these funding applications and make a recommendation to the Leadership Committee. To coordinate the overall grant application processes and ensure equal access for all Continuum members. To successfully complete funding applications to obtain the maximum amount available for homeless services and housing. To support optimal funding of the services and housing necessary to assist all homeless persons to achieve stable housing.

- Provide notice of fund availability to all Continuum members.

- Maintain and update selection criteria and application procedures for these funds to ensure objective and fair processes.
- Maintain and review ranking and scoring procedures to ensure objective accountability.
- Ensure that there is an Emergency Prevention system that assists the maximum number of persons possible, has equitable geographic distribution, and operates efficiently.
- Review and approve allocation of state and federal Homeless Prevention funds among agencies.
- Meet as necessary to make funding recommendations for other homeless grant funds that require ranking or approval.
- Meet jointly with the Leadership Committee as necessary.
- To create housing solutions including permanent supportive housing units, affordable community housing units, housing vouchers, short term housing subsidies, etc.
- To assist in identifying and facilitating the full utilization of all appropriate funding streams
- Participate in the Funders Collaborative

## **NEEDS ASSESSMENT COMMITTEE**

**PURPOSE** - The role of the Needs Assessment Committee is to provide ongoing assessment of homeless needs and resources in order to determine the most current gaps between the existing services and the highest service needs; to set priorities for filling gaps in homeless services; to develop and implement procedures for conducting the annual homeless housing and services inventory and the bi-annual count of unsheltered and sheltered homeless persons; to coordinate information with other human service and housing needs assessments; and to support the full implementation of the HMIS system as an effective resource for accurate point in time needs assessment data. Committee membership is comprised from the Continuum's General Membership. Membership of the Committee is open, with approval of the Leadership Committee, and no more than one person, or 10% of the membership, whichever is greater, shall be comprised of Individual Members of the Continuum. The committee meets at least quarterly for these purposes:

**RESPONSIBILITIES** -To identify local homeless service gaps and needs, assess available services, evaluate all HUD homeless service projects - both new and renewals, recommend priorities for the use of resources, and oversee the data collection of beds, services, homeless persons in shelters and on the streets according to HUD guidelines. They participate in full implementation of the HMIS system.

- Conduct oral presentations as an initial review of all new or expanded homeless service projects to identify and eliminate duplication and maximize the use of limited resources.
- Determine whether local needs are met by new or expanded homeless service projects.
- Make recommendations to the Grants Funding Committee annually on all HUD CoC project funding - both new and renewal.
- Complete annual updates of the current Housing Inventory Chart of homeless beds in DuPage County.

- Coordinate the Homeless Count process for counting both the sheltered and unsheltered homeless population meeting all HUD requirements and timeframes.
- Complete updates of the Homeless Populations chart to identify numbers of sheltered and unsheltered homeless persons.
- Ensure 100% participation by all homeless providers and agreement on the data needed in the countywide HMIS system to obtain accurate, point in time needs assessment information.
- Review on an ongoing basis the need for changes or improvements to the homeless management information system.
- Utilize the HMIS data and the Homeless Count information to make informed decisions regarding need.

### **HMIS (HOMELESS MANAGEMENT INFORMATION SYSTEM) POLICY COMMITTEE**

**PURPOSE** - Homeless Management Information System (HMIS) Policy Committee: The role of the HMIS Policy Committee is to develop, maintain, and update the homeless information system including the development and implementation of data protocols, reporting, policies, and problem solving measures. The committee also provides support to agency users. Committee membership is comprised of system users from the Continuum's General Membership. Membership of the Committee is open, with approval of the Leadership Committee, and no more one person, or than 10% of the membership, whichever is greater, shall be comprised of Individual Members of the Continuum. The committee meets at least every other month for these purposes:

### **RESPONSIBILITIES**

- Reports to the DuPage County Continuum of Care Leadership Committee
- Responsible for developing and reviewing HMIS policies and procedures
- Cultivate ways in which data measurement can contribute to providing visionary data leadership
- Monitor compliance with HUD Data and Technical standards.
- Assess compliance with all HUD HMIS benchmarks, especially regarding data integrity and reporting.
- Monitor and support ongoing end user training for implementation of the Service Point system.
- Ensure uniform data collection and resolve common issues.
- Review and approve the HMIS Policy and Procedures Manual.
- Approve and provide input on all HMIS policy and report development.
- Review staff reports on quality checks of client and program level data.
- Support the development of proficiency with using the ART reporting tool.
- Review and approve AHAR data submission.
- Share information that will enhance training opportunities and collaboration with other HMIS systems in the region.

- Provide ongoing feedback to the full-time database manager and supervisory staff regarding the HMIS system.

## **HOMELESS PREVENTION PROVIDERS COMMITTEE**

**PURPOSE:** The role of the Homeless Prevention Providers Committee is to share, evaluate, expand or obtain information, services, and resources pertaining to the prevention of homelessness; to assure efficient and effective disbursement of homeless prevention funds; and to develop and adhere to coordinated strategy and procedures. Committee membership is comprised from the Continuum's General Membership. Membership of the Committee is open, with approval of the Leadership Committee, and no more than one person, or 10% of the membership, whichever is greater, shall be comprised of Individual Members of the Continuum. The majority of members provide homeless prevention services. The committee meets at least every other month for these purposes:

### **RESPONSIBILITIES:**

- To coordinate the distribution of Homeless Prevention services and funds throughout DuPage County.
- To assure the best distribution of services and assistance to, and equal access by, persons who are homeless or at risk of homelessness.
- To assure the most effective use of Homeless Prevention and Rehousing dollars.
- To promote cooperative planning and service delivery as collaborative partners.
- To promote efforts to publicize and promote homeless services and resources, especially "hard to reach" households in the community of our services, eligibility, and the application process.
- To reduce cultural and language barriers to services for all individuals.
- To work collaboratively to assure comprehensive coverage of service availability and, particularly, that traditionally underserved areas and populations are provided access to assistance.
- To maximize coordination of efforts through a shared client management information database, Service Point. Service Point is an Internet-based database system that is managed by the Continuum.
- To promote a system of service delivery that is able to hold clients accountable and ensures that resources are not used repeatedly and/or inappropriately.
- To have a system that performs to Federal and State requirements, conducts annual program evaluation and review, and demonstrates a commitment to improving the system based on that evaluation and review.

## **APPEALS COMMITTEE**

**PURPOSE** - The role of the Appeals Committee is to resolve any decisions made by the Continuum or any of its committees following a written request for an appeal. The Appeals

Committee consists of the Vice-Chairpersons of the Community Outreach Committee, the Grants/Funding Committee, and the Needs Assessment Committee.

### **RESPONSIBILITIES**

- To conduct any legitimate appeal hearing and submit their findings to the Leadership Committee for a final resolution
- To follow the procedures outlined in Article VIII of the CoC Bylaws.

The DuPage Homeless Continuum also has one working subcommittee which operates for the specific task of the biennial Point in Time Count of the Unsheltered Homeless.

### **STREET COUNT COMMITTEE**

**PURPOSE** - Their role is to coordinate the activities necessary for conducting a comprehensive and accurate count of unsheltered persons according to HUD guidelines and best practices at least once every two years.

### **RESPONSIBILITIES**

- Complete a biennial street count of unsheltered homeless persons with the participation of police, volunteers and other community organizations.
- Determine most effective procedures including social media, website, brochures, volunteers, incentives, scheduling, command sites, procedures, interview surveys, police contacts, known locations, etc.
- Review and change survey forms and procedures regularly to increase effective counting of all unsheltered persons and to meet HUD requirements.
- Compile summary of numbers of persons by location and type of household.
- Interview all willing unsheltered persons to obtain information on their needs and characteristics.
- Send summary information to Continuum Consultant for completion of the Homeless Populations chart.

### **GENERAL MEMBERSHIP PROCESS**

Anyone may contact the Continuum for membership. All prospective members will provide contact information to a Committee Chairperson or the Continuum Consultant. A brief background of the prospective member is reviewed by the Leadership committee for membership. Upon acceptance, the member is added to the Continuum member database and the appropriate committee list. Committee members do not replace themselves. They may recommend a replacement for acceptance by the Leadership Committee. All members of the DuPage County Continuum of Care must submit a signed Memorandum of Understanding (MOU) and designate a voting member and alternate. There are separate MOUs for Organizational Membership or for Individual Membership. The CoC posts an ongoing invitation for new members to join on its website: <https://dupagehomeless.org/>

## **CONTINUUM MEETINGS SCHEDULE**

An annual Continuum calendar of all meetings is completed each July and distributed to all members of the Continuum. It is also available on the website at <https://dupagehomeless.org/> There are two meetings each year for the full membership. Committees meet quarterly at a minimum. A meeting notice, agenda, and meeting materials is sent via email to each Committee member at least seven days prior to each meeting. Attendance and minutes are recorded for all meetings and are the responsibility of the Committee chairperson. All Committee meetings are open to the general membership for attendance.

# DuPage County Community Services Department

## Leadership Committee

Oversees the Continuum, coordinates the Plan to End Homelessness and development of services, establishes policies, oversees the work of each committee, and approves all new members. Is authorized to make all final decisions pertaining to pursuit, contract, and allocation of funds; and the designation of the Lead Organization. The Leadership Committee manages Continuum wide communications. Members are the lead organization, the five standing committee chairs (excluding Appeals) and at least five (5) but no more than ten (10) at-large Continuum members.

## Affordable Housing Partners

Including Housing Action Coalitions and affordable housing advocates who partner with the DuPage County Continuum of Care to ensure that all persons have access to housing.

## Community Outreach Committee

Oversees membership and builds inclusiveness. Promotes community awareness of homelessness and support of a Plan to End Homelessness, promotes discharge policies that prevent homelessness, seeks to increase enrollment in mainstream benefits and increase income through employment benefits, and promotes outreach and engagement of unsheltered homeless persons.

## Grants/Funding

Implements ranking criteria, application procedures, and funding recommendations for homeless grant opportunities including but not limited to: the HUD Continuum grants, state and federal Homeless Prevention funds, and DuPage County Community Development Block Grants

## HMI S Policy

Develops, maintains, and updates the homeless information system including development and implementation of data protocols, reporting, policies, and problem solving measures. The committee also provides support to agency users.

## Needs Assessment

Identifies and prioritizes local service gaps and needs, implements the sheltered and unsheltered homeless count procedures, collects data, and recommends priorities for the use of resources.

## Homeless Prevention Providers

Efficient and effective disbursement of homeless prevention funds through a coordinated strategy and set of procedures for maximum benefit.

## Appeals

Resolves appeals made regarding decisions made by the Continuum. Members consist of the Vice Chairs of the Community Outreach Committee, the Grants/Funding Committee, and the Needs Assessment Committee.

## Exhibit G

**Policy Title:** Coordinated Entry

**Committee Creating:** Needs Assessment

**Last Approved:** 08/10/2016, Leadership Committee

**Policy Statement:** It is the policy of the DuPage Homeless Continuum of Care (CoC) to have a Coordinated Entry System (CES) to prioritize placement in CoC housing programs to result in better outcomes for those experiencing a housing crisis. The Coordinated Entry Process is intended to ensure that limited resources awarded through the CoC Program Competition are being used in the most effective manner, to target HUD funded programs to those who are most in need of assistance and to prioritize those with the highest needs and the greatest barriers to the most appropriate program. The CES will not delay access to Emergency Shelter to the extent that shelter is available.

To this end, the Coordinated Entry System will incorporate the CoC's expectations of community-wide standardization of assessment, placement, and prioritization. The CES will be well coordinated amongst COC agencies with respect to private client information; agencies will secure client consent to participate in a standard fashion. Access to system will be fair, equal and appropriately marketed to all persons especially those least likely to apply. The CES will utilize the COC Homeless Management Information System and data driven methods. DuPage County CoC will evaluate community-wide needs and HUD priorities annually. The CoC, as well as recipients of CoC Program-funded PSH, will maintain evidence of implementing CoC Prioritization.

The CoC's Coordinated Entry System will: 1. Target Permanent Supportive Housing resources to those who are the most vulnerable with the most intensive needs and longest length of literal homelessness<sup>1</sup>; 2. Minimize the time one experiences a housing crisis; 3. Link clients to the most appropriate housing intervention; and 4. Provide system level outcomes and reporting. The CES will apply to placement of homeless persons within the entire DuPage County geographic area into DuPage County Continuum of Care (CoC) housing programs.

The CoC will record adoption of this policy within Leadership Committee Minutes. This policy will include the date of acceptance as the most recent revision date. This policy is an attachment to the DuPage County Homeless Continuum of Care Governance Charter.

**Related Policies:** This policy will 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.

**Related Documents:** HMIS Privacy Plan, Security Plan and Data Quality Plan

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<sup>1</sup> Literal Homelessness- Lacking a fixed, regular, and adequate nighttime residence meaning the individual or family has a primary nighttime residence that is a public or private place not meant for human habitation; is living in a publically, or privately operated shelter designated to provide temporary living arrangements, or safe haven, or is exiting an institution where s(he) has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

## DuPage Homeless Continuum Coordinated Entry System (CES)

- A. Access** to CES will be fair, equal and appropriately marketed to all persons especially those least likely to apply. Access may occur through the request for housing services or presentation of a homeless condition to a COC agency providing street outreach or other homeless services. Street outreach and person centered engagement efforts are coordinated and strategic, actively seeking individuals across the entire Continuum geography. These efforts ensure that all persons experiencing chronic homelessness are engaged, even if they repeatedly decline housing and services. To the best of the outreach team and the CoC's ability, these individuals are connected to Coordinated Entry and connected with some form of assistance or intervention. In the CES, the initial assessment will be brief, asking only information necessary to make the referral at hand. The assessment is intended to be progressive, capturing different information about the client in different stages of homelessness. This system will not delay access to Emergency Shelter to the extent that shelter is available.

Direct referrals will be provided to those who need access to Homeless Prevention Services, Emergency Shelter Services, Domestic Violence, and supportive housing for youth. Some clients will progress to a more in-depth assessment to gain access to rapid re-housing services, transitional housing, and Permanent Supportive Housing. Need for these more intensive services outweigh the supply; access will be determined by a prioritization process.

At this time, agencies providing Permanent Housing Services will be the only agencies completing this progressive assessment and prioritization process. The target population will be those with the highest needs and the greatest barriers. This attempt to address the most vulnerable with the most intensive needs and longest lengths of homelessness, will serve as the groundwork and prototype for a full Coordinated Entry system addressing all continuum housing programs.

- B.** DuPage County CoC agencies will use **community-wide standard processes** and **standardized assessment tools** for assessment and recording of eligibility factors and severity of need.
- a. Timely assessments will be complete for persons who are literally homeless; staying in an Emergency Shelter, a place not meant for human habitation, a motel paid for by a charitable source, an institutional setting for fewer than 90 days, where they were previously staying in an emergency shelter or a place not meant for human habitation. Assessment may be completed either by phone or in-person, based on the policies and procedures established by each participating agency.
  - b. Agencies will respect private information and secure client consent to participate in a standard fashion.
    1. Agency will review the *Authorization to Use or Disclose Protected Confidential Health Information* with the client and clearly document client consent, or the refusal to share data. Agencies will attach a copy of the signed authorization to the client's Release of Information record in HMIS when applicable. If consent is not granted, agencies will contact the HMIS Help Desk for further support before entering any program Entry/Exit data into HMIS.

- c. Agencies will collect and record uniform data to determine Chronic Homelessness (as defined in the Chronically Homeless Final Rule 24 CFR 578.3 published December 2015, and comply with the regulations promulgated by this rule as of January 5, 2016) or other housing status as established by the US Department of Housing and Urban Development (HUD). i
- d. Agencies will use a common, standardized assessment tool to determine those with the highest needs and greatest barriers toward obtaining and maintaining housing.
  - 1. The Vulnerability Index-Service Prioritization and Decision Assistance Tool (VI-SPDAT) is the standard assessment tool to evaluate and determine severity of need for homeless housing. The VI-SPDAT has scoring applicable to either individuals or families (Family VI-SPDAT). The VI-SPDAT may be re-administered and subsequent score may be updated as needed. Prior to completing the VI-SPDAT v2.0 or VI-FSPDAT v2.0, it is necessary to complete training to ensure that the tool is properly administered.ii
  - 2. The VI-SPDAT and VI-FSDPAT can be completed directly in HMIS where scoring is automated. Read the script, directions, and questions to the client exactly as written. Clients may refuse to answer and responses are marked accordingly. The Pre-Screen Total score helps to determine the appropriate housing intervention. Recommendations are as follows –

	No Housing Intervention	Rapid Re-Housing	Permanent Supportive Housing
Individual	0-3	4-7	8+
Family	0-3	4-8	9+

- e. All agencies’ client case files must show sufficient documentation of eligibility and determination of priority placement for assistance. Documentation should meet the highest standard reasonable.iii
- f. Each agency is responsible to train and monitor staff completing these standard processes. As a support, the DuPage County CoC will provide resources and conduct periodic trainings on components of the standard process. Quality control within HMIS will be monitored by DuPage Community Services.

**C. Identification of Severity of Service Needs will be identified and verified through data-driven methods** such as the standardized assessment tool described above. The process will be documented in a program participant’s case file. The determination is based on severity of need rather than a specific diagnosis or disability type, and will not be 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). Agencies will maintain documentation of information pertinent to how the determination was made, including notes associated with case-conferencing decisions.

Persons assessed for Permanent Supportive Housing will be those identified as having the most severe service needs. These persons will have at least one of the following conditions:

- a. A history of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or
- b. 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.
- c. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
- d. When applicable, CoC's and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high-need, high cost beneficiaries.

**D. Assessment data will be maintained in the Homeless Management Information System (HMIS)<sup>iv</sup>**

- a. Agencies will follow their standard privacy practices.
- b. Agencies will enter client data using the Coordinated Entry entry/exit workflow within HMIS.
- c. HMIS System Admin and the HMIS Policy Committee will develop and update training and workflow document for users. Current workflow document will be located as an addendum to this document and will be stored at [www.dupageco.org/HMIS](http://www.dupageco.org/HMIS).
- d. Authorizations to share information will be completed during the coordinated entry assessment and PSH prioritization process and will be entered and stored in the HMIS system.

- E. Using the assessment data, the DuPage County CoC will rank severity of need and prioritize candidates to fill Continuum funded housing vacancies in both PSH dedicated and PSH non-dedicated beds** using the priorities below. The prioritization for Permanent Supportive Housing (PSH) programs emphasizes housing those who have been homeless the longest and have the most severe service needs<sup>2</sup>. Those with the highest scores combining length of homelessness and the VI-SPDAT score including applicable portions used to determine severity of service needs will be candidates for Permanent Supportive Housing. The DuPage CoC will follow HUD's guidance for prioritizing as found in [CPD-16-11 Issued July 25th, 2016](#).

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. 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

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<sup>2</sup> Specifically Scores from Sections B. Risks and D. Wellness of the Individual and Family VI-SPDAT will be used for prioritizing based Severity of Service Needs. Scores from Section A. History of Housing and Homelessness of the Individual and Family VI-SPDAT will be used for prioritizing based on length of homelessness, [Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#)

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.

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.

**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.

**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.

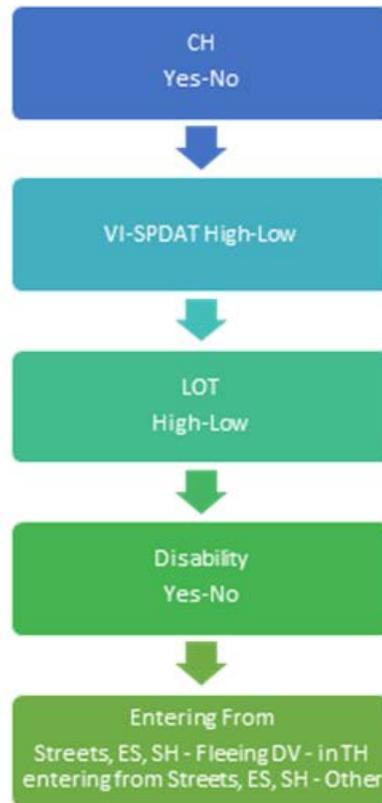
**Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter without Severe Service Needs**

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.

**Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing**

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.

- F. The DuPage County CoC Coordinated Entry Ad-hoc Committee will define length the process and priorities for **ranking need and prioritizing candidates to fill beds for Veterans, Transitional Housing Beds for Family and for Youth**. Other households will be assessed for assistance under the Rapid Rehousing Program.
- G. As **vacancies** arise, an agency will use a current HMIS generated priority list to find candidates as sorted in the diagram below. An agency may use pre-defined criteria for project or dedicated beds to select their top candidate from the list.



- a. Projects may have additional eligibility criteria. These criteria may be updated during the continuums annual project review process. Additional eligibility criteria typically includes special populations based on facility or best practice standards for specialty programs such as veterans, mentally ill, families or single adults.
  - b. Approved Additional Eligibility Criteria can be used by projects to determine suitability but not to give preference to households.
  - c. Agencies must maintain detailed eligibility and suitability criteria used to determine appropriate placement within their programs. Criteria must adhere to applicable HUD guidelines for their program type.
- H.** The agency with the vacancy must make suitable effort to complete **outreach** to the candidates in order of priority.
- a. Outreach should involve the original assessing agency to the extent possible
  - b. Due diligence will be exercised 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 the CPD-16-11 and adopted by the DuPage CoC.
  - c. An agency is not required to maintain a vacancy in an unoccupied unit indefinitely as a result of not being able to contact the top candidate. Agencies are encouraged to follow a Housing First approach to the maximum extent practicable. Subsequent candidates may be contacted for housing.

- I. Candidates must complete the **application** process and prove eligible for placement.
  - a. The candidate will be required to provide documentation that meets HUD and project specific requirements to enter a DuPage CoC housing program.
  
- J. Candidates will remain **active in the prioritization list until housed**, otherwise removed, or determined inactive. All candidates have the option to not apply or decline the housing which is offered. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting 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 housed. Evaluation of those who remain unhoused will be used to guide homeless assistance planning and system change efforts.
  
- K. The CoC, as well as recipients of CoC Program-funded PSH, will maintain **evidence of implementing CoC Prioritization through Recordkeeping**. 24 CFR 578.103(a)(4) outlines documentation requirements for recordkeeping 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. Evidence of following these orders of priority may be demonstrated by:
  - a. Evidence that the recipient is able to determine the severity of needs as defined in this policy 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 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.

The CoC will maintain evidence there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.
  
- L. DuPage County CoC will **evaluate community-wide needs and HUD priorities annually**, to determine a list of housing priorities for the year. Priorities may differ based on type of housing. The DuPage Homeless Continuum of Care will give priority to those persons with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens and with the most severe service. The CoC will establish an order of priority for PSH that is not dedicated or prioritized for chronic homelessness in order to ensure that those persons who do not yet meet the definition of chronic homelessness but have the longest histories of homelessness and the most severe service needs, and are therefore the most at risk of becoming chronically homeless, are prioritized.

M. DuPage County CoC will create and maintain written Standard Procedures applicable to all participating agencies for the Coordinated Entry Process and PSH Prioritization List

Required to be eligible for housing/program type						
Client Presenting Circumstances	Emergency Shelter	Transitional Housing	Permanent Supportive Housing	Rapid Re-Housing	Homeless Prevention	Supportive Services Only
Housing Status						
Homeless						
At Risk of Homelessness						
Disability						
Other						
Need for Supportive Services (SA, MI, Credit, Legal, Criminal justice Involvement)						
Future ability to maintain housing stability						
Short-term Crisis						
Employable or has Ability to regain Self-Sufficiency						
DuPage Residency-living in or moving to DuPage						

<sup>i</sup> HUD’s current definition of homelessness may be found at <https://www.onecpd.info/resource/1974/criteria-and-recordkeeping-requirements-for-definition-of-homeless/>.

<sup>ii</sup> Training and free downloads of the tool is available through, OrgCode Consulting Inc., [www.orgcode.com/course/vi-spdat-v2-training](http://www.orgcode.com/course/vi-spdat-v2-training)

<sup>iii</sup> Guidance on acceptable documentation may be found at [www.OneCPD.info](http://www.OneCPD.info) (Refer to HUD’s issued guidance. Homeless Status: Recordkeeping Requirements and At-Risk Status and Income: Recordkeeping Requirements). Based on this guidance, our continuum has developed a *Homeless Eligibility & Verification Form* to select housing status and the documents necessary to verify this status.

<sup>iv</sup> **Severity of Service Needs** refers to persons who have been identified as having the most severe service needs. 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; or ii. Significant health or behavioral health challenges or functional impairments which require a significant level of support in

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order to maintain permanent housing. Severe service needs as defined in paragraphs i. and ii. 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 that can identify the severity of needs such as the Vulnerability Index (VI), the Service Prioritization Decision Assistance Tool (SPDAT), or the Frequent Users Service Enhancement (FUSE). The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. (b) In states where there is an alternate criteria used by state Medicaid departments to identify high-need, high cost beneficiaries, CoCs and recipients of CoC Program-funded PSH may use similar criteria to determine if a household has severe service needs instead of the criteria defined above. However, such determination must not be based on a specific diagnosis or disability type.

Specifically Scores from Sections B. Risks and D. Wellness of the Individual and Family VI-SPDAT will be used for prioritizing based Severity of Service Needs. Scores from Section A. History of Housing and Homelessness of the Individual and Family VI-SPDAT will be used for prioritizing in combination with length of homelessness, [Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#)

**Housing First.** Housing First is an approach in which housing is offered to people experiencing homelessness without preconditions (such as sobriety, mental health treatment, or a minimum income threshold) or service participation requirements and in which rapid placement and stabilization in permanent housing are primary goals. PSH projects that use a Housing First approach promote the acceptance of applicants regardless of their sobriety or use of substances, completion of treatment, or participation in services. HUD encourages all recipients of CoC Program-funded PSH to follow a Housing First approach to the maximum extent practicable.

### **CES Update Summary**

Created: 11/15/2013

Approved: 1/15/2014

Approved: 4/22/2015

Approved 08/10/2016 - This policy reflects the new definition of chronically homeless as defined in CoC Program interim rule as amended by the Final Rule on Defining "Chronically Homeless" and accepts the orders of priority established in prior notice CPD-16-011.

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Mary A. Keating, Director  
DuPage County Community Services

8/15/16  
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Date