Amarillo Continuum of Care

Policies and Procedures

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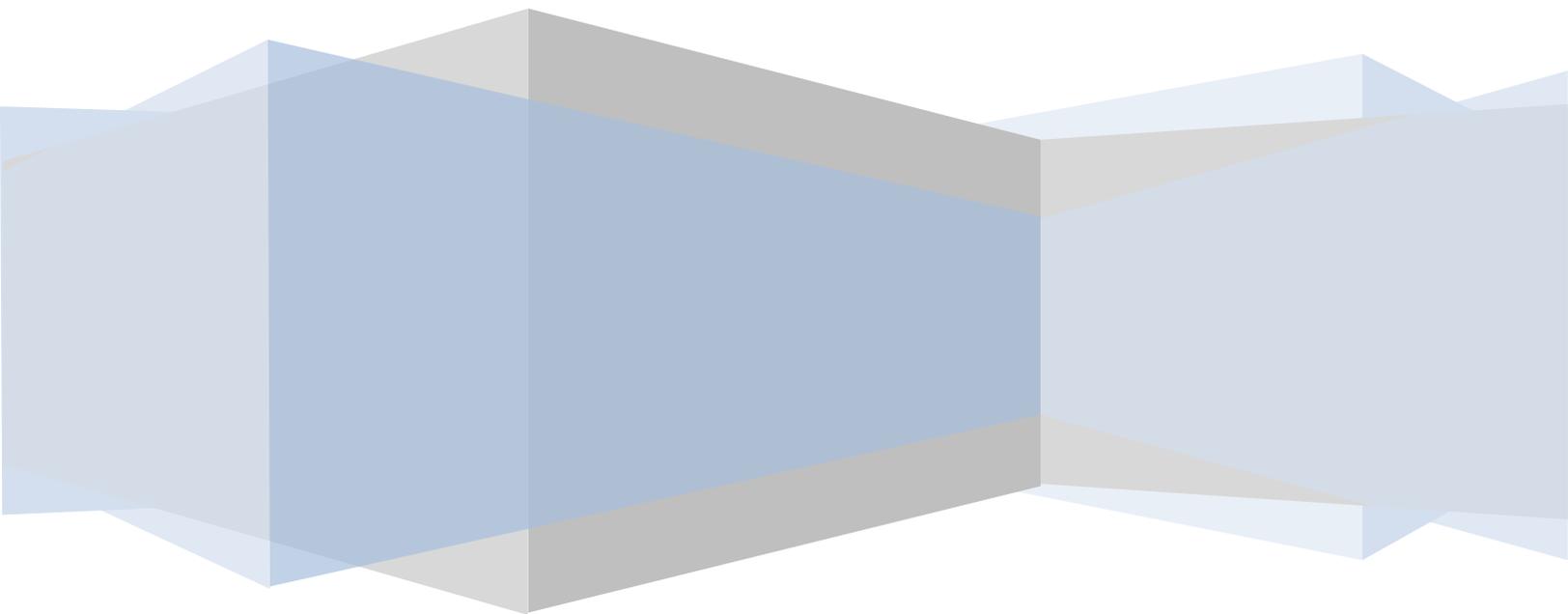
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Introduction and Purpose

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

Background

A Continuum of Care is a collaborative funding and planning approach that helps communities plan for and provide, as necessary, a full range of emergency, transitional, and permanent housing and other service resources to address the various needs of homeless persons. HUD also refers to the group of service providers involved in the decision-making processes as the "Continuum of Care."

The Amarillo Continuum of Care ("CoC") serves the area encompassed within the city limits of Amarillo, Texas.

The Continuum of Care's governance charter will:
1. Be reviewed and updated annually by the CoC board in consultation with the HMIS lead and collaborative applicant
2. Specify policies and procedures needed to comply with requirements associated with establishing and operating a CoC and HMIS requirements prescribed by HUD

Structure and Governance

Membership

1. Membership in the Amarillo CoC is open to agencies or organizations that work within the City limits of Amarillo to provide or facilitate homeless services.
2. The Amarillo CoC will maintain an official list of members.
3. The CoC will be established by representatives from relevant organizations within the geographic area of the CoC. 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.
4. Membership in the Amarillo CoC is open to all stakeholders in Amarillo, Texas. Annually, the Amarillo CoC shall issue a public invitation for any interested person within Amarillo to become a member of the CoC. The invitation will be sent to relevant organizations in Amarillo and published via website, email ListServe, or newspaper with wide circulation in Amarillo.

2014 Voting Membership

1. For 2014, each agency or organization shall designate the chair and an elected representative as voting members of the Amarillo CoC. An alternate voting member may also be elected. Voting members must be approved by a simple majority vote of current Amarillo CoC members.
2. CoC Board will maintain an official CoC list of voting and alternate voting representatives.
3. Voting members will be responsible for evaluating proposed governance structures, completing a community assessment, submitting CoC-applicant reviews to the prioritization committee, and voting new policy into place.

Amarillo Continuum of Care Leadership

The Leadership Team shall consist of not less than three voting directors. As members resign, the Leadership Team will appoint an interim member to the position until the next annual member meeting is conducted and a formal vote and approval process can take place. This process will be reviewed, updated, and approved by the CoC annually in compliance with the CoC Policies and Procedures. The CoC Leadership has oversight for governance, performance, competition submission, policy creation and day-to-day activities of the CoC, however, the CoC Leadership is responsible to the general membership.

The CoC membership will review, update, and approve the selection process at least once every five years.

The Board will consist of individuals who represent relevant organizations and projects that serve homeless subpopulations and will include at least one homeless or formerly homeless individual.

To serve on the Leadership Team, individuals must meet the following minimum requirements:
1. Must attend a minimum of 75% of the CoC regular meetings in a calendar year.
2. Must attend a minimum of 75% of the meetings of their assigned Standing Committee in a calendar year.
3. Must be current with membership fees each year.
4. Must disclose potential conflicts of interest and sign a conflict of interest statement annually.
5. Must recuse oneself when voting on a matter that is a conflict of interest.
6. Must have the authority to act on behalf of the organization they represent.
7. Minimum attendance requirements can be met with the use of a written proxy for no more than two (2) meetings in a calendar year.

Terms
The Leadership Team is elected to two-year terms by a simple majority of the voting membership. Each director shall hold office until her/his successor is duly elected or recognized. In the case of the absence or disability of any director and of any person hereby authorized to act in his/her place during his/her absence or disability, the Leadership Team may by resolution delegate the powers and duties of such director, to any other director, or to any other person whom it may select.

Lead Agency Designation
The CoC has designated the City of Amarillo, Community Development Department as the collaborative applicant and lead agency in the Amarillo Continuum of Care.

HMIS Governance
The CoC has designated the City of Amarillo as the lead agency of the HUD funded efforts to end homelessness and for implementing and operating a homeless system within their jurisdictions. Per HUD policy the CoC is responsible for HMIS project oversight and implementation, which encompasses
   a.) Planning,
   b.) Administration,
   c.) HMIS budget approval and oversight,
   d.) Grant monitoring and work plan submission approval,
   e.) Software selection,
   f.) Managing of HMIS data compliance with HMIS data standards
   g.) Reviewing and approving all policies, procedures and data management plans contributing to HMIS Organizations
   h.) Review, revise, and approve privacy, security and data quality plans
   i.) Ensure HMIS administration in compliance with HUD requirements
   j.) Ensure consistent participation of providers

The CoC oversight and governance responsibilities are carried out by its Steering Committee. The general decision making process is as follows:
   a.) Draft policies, procedures, data management plans and other work will be reviewed, amended, and preliminarily approved by the Steering Committee.
   b.) The CoC representatives on the Steering Committee are responsible to share draft policies, procedures, data management plans and other work with their CoC for feedback and approval.
   c.) The Steering Committee may give final approval of policies, procedures, data management plans and other work after receiving feedback and approval from the CoC.

No policy procedure, data management plan or other work may be approved by the Steering Committee without confirmation and approval by the CoC.

Committees
The CoC will establish standing committees as well as sub-committees and workgroups/taskforces, with the chairs of each appointed by the CoC Chair.

Internal Committees
Local Homeless Coordinating Committees are key to the success of the Amarillo Continuum of Care. The CoC relies heavily up on the agencies and committees to oversee strategic planning efforts, review performance, and communicate to CoC leadership. The CoC and agencies will collaborate with consolidated planning efforts. The CoC membership will complete and submit the City's project priority

ranking surveys and will submit PIT and gaps analysis data to City officials. The CoC will draft and update the Ten Year Plan to End Homelessness.

A Point-in-Time Count Workgroup has been established to oversee the work of the annual unsheltered point-in-time count and quarterly sheltered point-in-time counts. The committee is made up of a PIT lead and a member of each agency. The PIT committee and the HMIS committee will coordinate to assure HUD regulations for the count are adhered to and adequate support is available locally.

A Coordinated Assessment Workgroup has been established to outreach and educate local agencies about coordinated assessment and represent the development of a quick assessment tool which is scheduled for implementation in fall of 2015.

In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, the CoC will establish and operate a coordinated assessment system that will provide initial, comprehensive assessment of needs and can be easily accessed.

The Continuum's specific coordinated assessment system will document the plan for addressing the needs of individual or families who are fleeing domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers.

The system will document a plan to coordinate the implementation of a housing and service system within the CoC's geographic area to meet the needs of homeless individuals (including unaccompanied youth) and families.

The system will encompass outreach, engagement and assessment; encompass shelter, housing and supportive services, and prevention strategies.

CoC Funding and Competition Subcommittees
A Continuum of Care Grantee Subcommittee has been established to support the HUD NOFA process and drive training and technical assistance needs for CoC grantees. The committee will consist of voting representatives of member agencies who work closely within the Continuum of Care process and are recipients of CoC funding. The committee will have an appointed Chair and Co-Chair under the direction of the Leadership Team and will address issues of performance and goal setting as it pertains to CoC grantees, and will meet for training a minimum of each quarter with additional meetings held as needed surrounding NOFA/application training and debriefing.

A Prioritization Subcommittee will be established by the CoC. This committee will be made up of individuals in the community who have interest in the Continuum of Care process but are not an applicant for the funding cycle of HUD's SuperNOFA. This committee will review community unmet needs, solicit proposals, establish funding priorities, conduct a thorough review of applications to assure accurate and strong applications and rank the applications according to those reviews.

The CoC Lead agency will consult with ESG sub-recipients about the allocation of ESG funding and evaluate and report on the performance of ESG recipients and sub recipients. The CoC Lead agency will meet with ESG applicants individually, in one-on-one meetings, to discuss their allocations. The CoC Lead agency proposes the allocations to the CoC membership for approval. The CoC Lead agency will

compile monthly performance reports, using data from the HMIS and expenditure reports, for each sub-recipient, and presents that information to the general membership in monthly meetings.

Annually, during the CoC grant renewal process, the CoC Lead agency asks the CoC to set and approve funding priorities. Currently, those priorities are:
1) HMIS
2) Permanent Supportive Housing
3) Transitional Housing

Communication

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

- Maintaining a directory of CoC members, as well as updating and distributing it regularly
- Facilitating localized discussion and planning through Homeless Coordinating Committees
- Establishing working groups to move the work of the CoC forward between meetings
- Encouraging partners with similar interests to join forces, either by sharing information/best practices or working on strategies to collaborate and support each other's efforts
- Coordinating peer monitoring among CoC and ESG grantees.
- Sharing information regularly to maintain a focus on ending homelessness in general and the continuum in particular

Methods of sharing information between CoC meetings will include:

- Information sent out via email
- Training via webinar and conference call
- Technical assistance via webinar, in person and phone communication
- Information added to the CoC website (www.amarillo.gov), including:
    - Information on the work of the Continuum
    - Resources
    - Plans and Implementation
    - Research and data
    - Funding availability, grant application and awards
    - Written agendas and minutes from meetings
    - Policies

Meetings

- Generally, a minimum of 10 meetings will be held each year.

- All the meetings of the members of the CoC shall be open to the public. Meetings other than member meetings, including meetings of the Leadership Team, are not open to the public.
- Open Membership and New Members
Membership in the Amarillo CoC is open to all stakeholders in Amarillo, Texas, including 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 or formerly homeless individuals.
- Annually, the Amarillo CoC shall issue a public invitation for any interested person within Amarillo to become a member of the CoC. The invitation will be sent to relevant organizations in Amarillo and published via website, email ListServe, or newspaper with wide circulation in Amarillo a minimum of three days prior to the meeting.
- The Leadership Team of the CoC may call special member meetings by providing an agenda to call the members at least 3 days prior to such meeting.
- A quorum of the membership shall exist if a majority of the total members are present in person or electronically.
- The CoC chair or her/his designees shall take reasonable steps to insure that all members are notified of the time and place of all member meetings.
- A reasonable period of time shall be set aside for members to address the CoC at the member meetings.
- All CoC members shall be permitted to propose "new business" for the next member meeting of the CoC.
- The annual member meeting and strategic planning meeting of the CoC shall be set by the Leadership Team who shall also set the time and location of the meeting.
- It is recommended that one annual half-day strategic planning session be held in the fall of each year.

Training and Technical Assistance
The CoC's Lead agency will conduct trainings and provide technical assistance for sub-recipients and general members relative to HMIS and other CoC-related activities as they are identified throughout the year.

Code of Conduct

The Amarillo CoC is responsible to its stakeholders that include affiliates, board, members, and others who have placed faith in our mission, support our goals and work on behalf and with people who are experiencing homelessness throughout the City of Amarillo.

To uphold this trust we will:

- Promote good stewardship of resources;

- Refrain from using organizational resources for non-CoC purposes;
- Observe and comply with all laws and regulations affecting the CoC, staff, officers and board members;
- Insure open and transparent reporting and fiscal accountability;

We will disclose fully the state of our organization, recognizing that power comes from a healthy evaluation of both our strengths and weaknesses, and uphold the highest standards of accountability.

Conflict of Interest

The CoC will ensure that the CoC Membership, its Leadership Team, and any persons acting on behalf of the CoC comply will conflict-of-interest requirements and recusal processes.

- We will avoid any conflict of interest or appearance of a conflict of interest
- We will avoid any activity with vendors, grantees, or others that would compromise decisions or the ability to effectively carry out the duties for which we are responsible or that would conflict with the best interest of the CoC.
- All gifts, favors, and fees will be declared except for promotional items or items of nominal value.
- We will avoid influencing the selection of staff, consultants and vendors solely on the basis of a personal relationship.
- Violation of standards by officers, employees or agents of the CoC may result in disciplinary action up to and including termination or removal from the CoC's Leadership.
- Recusal
  No director will cast a vote, nor take part in the final deliberation in any matter in which he or she, members of his or her immediate family or any organization to which such director has allegiance, has a personal interest that may be seen as competing with the interest of the Corporation. Any director who believes he or she may have such a conflict of interest will so notify the Board prior to deliberation on the matter in question, and the Board will make the final determination as to whether any director has a conflict of interest in any matter. The minutes of the Board meeting will reflect disclosure of any conflict of interest and the recusal of the interested director.

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

Grievance
Disputes and problems should be resolved between parties on a one-to-one basis. The issues should be clearly stated and understood by both parties. If this process does not resolve the

matter, the aggrieved party may seek resolution through the process outlined below, which can lead to binding arbitration or alternative means such as mediation or facilitation.

Formal Complaint Process

Member notifies his/her immediate supervisor/Executive Director to discuss complaint, put complaint in writing, and discuss possible solutions.	If dispute is not resolved, then…	Supervisor/Executive Director discusses matter of Amarillo CoC who replies in writing to member's complaint within 10 working days.
Member appeals to Amarillo CoC within 5 working days. Amarillo CoC must meet with parties within 5 working days of receiving appeal.	If dispute is not resolved, then…	Amarillo CoC will discuss grievance with leadership team and parties and within 5 working days, make a decision on the grievance and take any necessary action.
If decision is unfavorable to member, then member may submit to binding arbitration before an independent and qualified arbitrator.	If dispute is not resolved, then…	Arbitrator will make decision with a timeframe to be determined. Arbitrator will determine how the costs of arbitration are to be divided.

HEARTH Act Goals
The CoC has adopted goals related to the evaluation of program and system performance in accordance with the HEARTH Act.
- Reducing the Length of Time Homeless (Goal of 30 days or less)
- Reducing the Number of Homeless People
- Reducing the Number of Newly Homeless
- Reducing Returns to Homelessness
- Increasing Exits to Permanent Housing
- Increasing Income and Employment
- Increasing access to and utilization of mainstream benefits

Program Admittance of Households with Minors
The CoC is committed to keeping children under the age of 18 with their families: Specifically, emergency shelters, transitional housing and permanent housing programs with ensure families with children under the age of 18 are not denied admission or separated when entering shelter or housing.

Veterans
It is the policy of the CoC that eligible veterans are first referred to VA services, but in the case that a veteran is unable to access VA services or is ineligible, they will be prioritized for CoC and ESG services based first on vulnerability and secondly on veteran status.

Point-In-Time Count

The Amarillo CoC conducts at least one unsheltered point-in-time count of homeless persons and quarterly sheltered point-in-time counts of homeless persons per year. This count collects data on where homeless households are sleeping, household size, disability, chronic homelessness, and all other subpopulation information required to be reported into HDX for the annual point-in-time count.

HUD requires that all federally-funded homeless services participate in PIT during the last part of January each year. The PIT count is a physical count or census of all homeless persons living in emergency shelters, transitional housing, and on the streets on a single night. It does not capture those who experience only brief episodes of homelessness or account for changes throughout the year due to economic and social forces. Amarillo CoC has a single HMIS that collects information on homeless persons served, such as their characteristics and circumstances and the services they receive. The Amarillo HMIS is utilized as the primary source of obtaining sheltered point-in-time count data.

Housing Inventory Chart

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

For each program that houses persons experiencing homelessness, the CoC will collect data on:
- The number of beds and units currently serving individuals and families
- The number of beds and units created in the past year ("new inventory")
- The number of beds and units that are fully funded but not yet serving homeless people ("under development")

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

To collect Housing Inventory data, the CoC will annually:
- Use HMIS data to complete the Housing Inventory Chart OR
- Conduct a housing inventory survey (via mail, fax, e-mail, web-based, phone or on-site) of homeless providers, which will include the previous year's Housing Inventory Chart and instruct providers to review and update housing inventory information on the specified night of the housing inventory. If the CoC decides to collect housing inventory information via a survey, the CoC will:
  - Provide written instructions to all homeless providers on how to report an accurate bed inventory

- Systematically train provider-level staff on how to obtain an accurate bed inventory
- Include definitions of key terms used in the inventory chart
- Follow-up with providers (e.g. via telephone, email, or in-person) to ensure the maximum possible response rate and accuracy of the housing inventory information
- After receiving the inventory information, confirm the information with CoC leadership and each provider to verify the accuracy of the data

Unmet need

Annually, the CoC reviews the data collected as a result of the homeless counts and housing/services inventories and determines what housing and services are needed in each area of our homeless populations. The methods to undertake this review include:
- Determining Housing Needs
- Calculating Unmet Needs
- Prioritizing Gaps

Each year the CoC reports to HUD what housing for homeless people we need in our community, including the need for families and individuals for Emergency Shelter beds, Transitional Housing beds, and Permanent Supportive Housing beds. This information is also necessary for the long-term programming and strategic planning that we do as a community. HUD's standardized methodology for calculating unmet need uses point-in-time data and local provider expertise to calculate an initial estimate of unmet needs.

Determining Housing Needs

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

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

The CoC will obtain the housing needs of unsheltered homeless persons in one of two ways:
- Individually surveying outreach workers or teams, then averaging the estimated percentages, and applying the average to the total unsheltered population; or
- Convening a group of outreach workers to discuss and arrive at a consensus on the percentage of unsheltered persons in need of each type of housing

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

Calculating Unmet Need

The CoC will begin by using the following standardized formulas for calculating unmet need by program type (emergency shelter, transitional housing, and permanent supportive housing):
- Unmet need for Emergency Shelter (ES) = (the number of unsheltered homeless persons who need ES + the number of persons currently in ES who will only need ES) – (Total number of ES beds + ES beds under development)
- Unmet need for Transitional Housing (TH) = (The number of unsheltered homeless persons who need TH + the number of persons in ES who need TH + the number of persons in TH who will only need TH) – (Total number of TH beds + TH beds under development)
- Unmet need for Permanent Supportive Housing (PSH) = (The number of unsheltered homeless person who need PSH + the number of persons in ES who need PSH + the number of persons in TH who need PSH) – (Total number of vacant PSH beds + PSH beds underdevelopment)

AHAR Participation

The Annual Homeless Assessment Report (AHAR) is a report by HUD to the U.S. Congress on the extent and nature of homelessness in America. It is based on data from Homeless Management Information Systems and on information from Continuum of Care (CoC) Collaborative Applications. The AHAR provides estimates of the number of homeless persons nationally, a descriptive profile of homeless persons, and an analysis of service use patterns.

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

Unduplicated data will be collected for the six standard AHAR report categories: Emergency Shelter-Individuals, Emergency Shelter-Families, Transitional Housing-Individuals and Transitional Housing-Families, Permanent Supportive Housing-Individuals and Permanent Supportive Housing-Families. Data will also be collected for any supplemental reporting categories established by HUD.

In order to participate in the AHAR, the CoC's HMIS must be capable of:

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

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

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

HMIS

The Amarillo Homeless Management Information System (AHMIS) is a collaborative project of the City of Amarillo and participating Partner Agencies. HMIS is a computerized data collection application designed to capture information about homeless people and homeless programs over time, with the exception of domestic violence service providers. HMIS is mandated by the U.S. Department of Housing and Urban Development (HUD) under the HEARTH Act for all communities and agencies receiving HUD Continuum of Care (CoC) and Emergency Solutions Grant (ESG) homeless assistance funds. It is also mandated for all agencies receiving State Unified Funding. HMIS is essential to efforts to streamline client services and inform public policy. Through HMIS, homeless people benefit from improved coordination in and between agencies, informed advocacy efforts, and policies that result in targeted services. Analysis of information gathered through HMIS is critical to the preparation of a periodic accounting of homelessness in the City of Amarillo and our Continuum of Care, which may include measuring the extent and nature of homelessness, the utilization of services and homeless programs over time, and the effectiveness of homeless programs. Such an unduplicated accounting of homelessness is necessary to service and systems planning, effective resource allocation, and advocacy. The parties to this Memorandum of Understand (MOU) share a common interest in collaborating to end homelessness and successfully implementing and operating HMIS in the City of Amarillo.

The Amarillo Continuum of Care goal is to collaboratively provide an effective range of homeless housing and services to reduce instances and length of homelessness. The

Continuum of Care system components includes prevention, emergency shelter, transitional housing, permanent housing and permanent supportive housing. Outreach efforts and specialized supportive services actively identify and support homeless providers to collect uniform client information over time. Analysis of information gathered through HMIS is critical to accurately calculate the size, characteristics, and needs of the homeless population; this data is necessary to service and systems planning, and advocacy.

The CoC Lead agency, which is also the HMIS Administrator, created an HMIS Charter that the CoC approved on January 10, 2014. Per the HMIS Charter, the HMIS Administrator will:
● Review, revise, and approve privacy, security and data quality plans
● Ensure HMIS administration in compliance with HUD requirements
● Ensure consistent participation of providers

CoC and ESG Funding
The Lead Agency, with support and input from the CoC, prepares the Annual Collaborative Application in response to Continuum of Care (CoC) Notice of Funding Availability (NOFA) issued by the federal department of Housing and Urban Development (HUD).   The ESG Collaborative Application is also prepared by the Lead Agency and submitted to TDHCA.   The procedure as follows applies to both the funding processes for ESG and CoC grants.

ESG Awardee Selection
I.   **Setting Local Goals:**   The ESG Coordinator develops a NOFA for the local ESG competition based on consultation with the CoC on current needs and past performance of the ESG program. Local goals are developed throughout the year during monthly meetings with the Amarillo CoC members.

II.   **Consultation with CoC member organizations:**   Through a review of prior year accomplishments, HMIS data, and needs analysis the CoC will make a recommendation for funding priorities for the ESG grant activities.

III.   **Evaluating ESG Applications:** The CoC Board establishes a grant review subcommittee to review ESG applications and make ESG awardee selection. Criteria for evaluation includes a maximum of 10 point ranking in the following categories:
   a.   Applicants Capacity and Experience
   b.   Project's Benefit to Community
   c.   Collaboration and Coordination
   d.   Sustainability of Project
   e.   Leveraging
   The Grant Review Subcommittee reviews and ranks the proposed ESG awards and presents a recommendation to the CoC Board which then conducts a majority vote to approve that recommendation for the collaborative ESG application.   The collaborative ESG application is then completed by the ESG Coordinator, Lead Agency of the CoC, the City of Amarillo Community Development Department.

IV.   **Reasonable Accommodations and Language Requests:**
   Section 501 of the Rehabilitation Act requires agencies to provide reasonable accommodation to qualified applicants and employees with disabilities. A

"reasonable accommodation" is a change in the work environment or in work processes that enables a qualified individual with a disability to enjoy equal employment opportunities. The accommodation must be effective in meeting the needs of the individual by addressing the barrier created by the functional limitations.
Types of reasonable accommodations include, but are not limited to:

- modification or adjustment to an application process to permit an individual with a disability to be considered for grant funds,
- modification or adjustment necessary to enable a qualified individual with a disability to perform the essential functions of the job, and
- modification or adjustment that enables an employee with a disability to enjoy equal benefits and privileges of employment.

It is the policy of the Amarillo CoC to provide reasonable accommodation to qualified applicants and employees with disabilities unless the CoC can show it will cause an undue hardship to the operation of the program. The CoC's policy is that applicant requests should be processed as soon as possible, but in no more than ten calendar days.

The City of Amarillo's Community Development Department recognizes the importance of effective and accurate communication between its personnel and the community and has developed a Language Access Plan (LAP). Language barriers can impede effective and accurate communication in a variety of ways. Language barriers can sometimes inhibit or even prohibit individuals with limited English proficiency (LEP) from accessing and/or understanding certain rights, obligations and services.
The purpose of this LAP is to establish effective guidelines for personnel to follow when providing services to, or interacting with, individuals who are LEP consistent with federal law prohibiting national origin discrimination, including Title VI of the Civil Rights Act.
The Amarillo CoC shall adhere to this Plan in order to take reasonable steps to provide access to LEP persons to the services and benefits the CoC provides in its programs and activities. Staff shall provide free language assistance services to LEP individuals whom they encounter and whenever an LEP individual requests language assistance services. The CoC will inform the public that language assistance services are available free of charge to LEP persons.

V. **Capacity to Report Performance Measures and Outcomes:** The ESG Coordinator, City of Amarillo Community Development, executes funding agreements with each ESG subrecipient agency which require monthly reports of performance and outcomes to be submitted to the Community Development Department for reporting by the 8th of each month. Staff of the Community Development Department compiles performance data and submits monthly to the Texas

Department of Housing and Community Affairs through the Contract Reporting System.

VI. **Adopted by vote of CoC Board of Directors:** The Amarillo Continuum of Care Policies and Procedures were adopted by a vote of the CoC Board of Directors in January, 2014. The policies are reviewed annually and changes are voted on for approval by the CoC Board of Directors as needed.

Prioritization Policies and Procedures

Eligible proposals will be prioritized for inclusion in the CoC's coordinated application by the Grant Review Subcommittee acting as the rank and review group. Applications not scoring high enough will not be placed on the project funding request as part of the Consolidated Application.

CoC leadership recruits Grant Review Subcommittee members, prioritizing members who have served as members in the past or who have other relevant experience. The Prioritization Committee will be composed of representatives from a cross-section of groups which might include: Faith-based and non-profit providers of homeless services and housing; city representatives, mental health; substance abuse; veteran's services; and consumers.

- Grant Review Subcommittee members must declare that they have no conflict of interest,
- Members must be appointed every year and their eligibility verified.
- Members must be able to dedicate time for application review and committee meetings.
- Grant Review Subcommittee members (3-5) are given an orientation which includes:
  - Information regarding homeless activities, needs, services, definitions and other issues that are pertinent to the CoC
  - A background of McKinney Vento and the local process
  - The role of the Grant Review Subcommittee
  - Review of the scoring tools, applications, and resources
- Grant Review Subcommittee members receive eligible application proposals and scoring materials.
- Prior to the Ranking meeting, all Grant Review Subcommittee members review all applications. Members read projects, preliminarily score them, and note any questions/comments to follow-up with applicants.
- If the CoC Team Leaders have any knowledge that could lead HUD to deny granting funds to a project, they will share that information with the Grant Review Subcommittee. CoC Team Leaders will discuss this information with applicants as part of technical assistance provided to assist project development.
- The Grant Review Subcommittee meets to review and discuss each application together and to finalize individual scores. CoC Team Leaders present at the Committee meeting

to record decisions of the Committee and any comments/recommendations they have for applicants.

- o The Grant Review Subcommittee discusses the merits of each proposal, scores the applications, and turns in score sheets to CoC Team Leaders.
- o Overall raw scores are calculated by CoC Team Leaders.
- o The Committee considers adjustments for such issues as HUD incentives or requirements.
- o The Committee considers proposal changes or project budget adjustments that may be required to meet community needs.
- o The Committee determines the rank and funding levels of all projects considering all available information.
- o During deliberation, CoC Team Leaders will provide technical assistance by responding to questions of remind the Committee members of their responsibilities if they step outside their purview.

- Scoring results are delivered to applicants with a reminder about the appellate process.

  - o Each applicant receives a denial or recommendation for award letter noting recommendation conditions and application adjustments or technical edits that need to be made. Applicants are asked to submit an acknowledgement of conditions with a timeline for addressing conditions and correct their applications and send them back to CoC Team Leaders before final submission to HUD.
  - o If, based on the grantee's written acknowledgement of and timeline for addressing conditions, the Leadership Team has continued concerns; the Leadership Team will draft recommendations to address identified concerns. Timelines for corrections and follow-up visits are anticipated to be sixty (60) days or less, but will be defined on a case-by-case basis in the approved recommendations. Correspondence will be made available to the Grant Review Subcommittee.
  - o Applications which do not meet the threshold requirements will not be included in the Priority Listing in the Consolidated Application, and therefore will not be forwarded to HUD for consideration.
  - o If more applications are submitted than the CoC has money to fund, the lowest-scoring applications will not be included in the Priority List in Exhibit 1, and therefore will not be forwarded to HUD for consideration.

Policy for Appeals of Rating/Ranking Eligible Appeals
- This appeals process applies to both applicants for ESG and for CoC funds.
- The application of any agency which a) is unranked, or b) receives decreased funding) e.g. projects receiving reallocated renewal funds) may appeal.
- Applicants that have been found not to meet the threshold requirements are not eligible for an appeal.

- Appeals cannot be based upon the judgment of the Grant Review Subcommittee.

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

All notices of appeal must be based on information submitted by the application due date. No new or additional information will be considered. Omissions to the application cannot be appealed. The appealing applicant must notify the ESG Coordinator/CoC Lead Agency in writing to request an appeal within 7 days of receiving notice of their application status.

The Amarillo CoC Board of Directors will conduct a hearing on the appeal and will make a decision based on a majority vote. Members of the Grant Review Subcommittee will abstain from that vote. The CoC Board will then provide the appealing applicant with a written notice of its decision within 7 days.

Dedication and Prioritization of PSH Strategies to Increase the Number of PSH Beds Available to Chronically Homeless.

The Amarillo Continuum of Care has adopted two strategies per the Federal Strategic Plan: Opening Doors, to increase progress towards ending chronic homelessness using existing CoC funded PSH projects:
1. **Increase the number of CoC Program-funded PSH beds dedicated to persons experiencing chronic homelessness.**
   Dedicated PSH beds 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 this occurs, the program may then follow the order of priority in the HUD notice CPD-14-012 as adopted by the CoC. 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 those criteria within the Amarillo CoC's geographic jurisdiction. These PSH beds are reported as "CH Beds" on the CoC's Housing Inventory Count (HIC).   The CoC may increase the number of CoC program-funded PSH beds that are dedicated to persons experiencing chronic homelessness when it's recipients of non-dedicated CoC program-funded PSH request a grant amendment to dedicate one or more of its beds for this purpose. A recipient of CoC program-funded PSH is prohibited from changing the designation of the bed from dedicated to non-dedicated without a grant agreement amendment. Similarly, if a recipient of non-dedicated PSH intends to dedicate one or more of its beds to the chronically homeless it may do so through a grant agreement amendment.
2. **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. Non-dedicated beds will be prioritized for chronically homeless persons in the following order:

    i. Chronically homeless individuals and families with the longest history of homelessness and with the most severe service needs.
    ii. Chronically homeless individuals and families with the longest history of homelessness.
    iii. Chronically homeless individuals and families with the most severe service needs.
    iv. All other chronically homeless individuals and families.

The Amarillo Continuum of Care will continue to prioritize persons experiencing chronic homelessness in the PSH program until there are no persons within the CoC's geographic area who meet those criteria.

Annual Performance Report (APR)

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

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

To ensure accurate reporting and local accountability, it is the policy of the Amarillo CoC that agencies are to submit a pdf draft copy of their eSnaps submission to the HMIS designated staff person 60 days before the APR is due to HUD. Following that review, agencies is to submit a draft copy to the CoC designated staff person, no later than 30 days before the APR is due to HUD. Once the HMIS and CoC leads have reviewed the reports and any corrections have been incorporated, the agency may then submit their APR to HUD.

Monitoring

CoC Team Leaders shall make an annual visit to CoC funded projects. In order to avoid conflicts of interest, the leadership member conducting the visit shall not be a staff member of any agency participating in the project.

At a minimum, the Site/Monitoring Visit will consist of the following activities/components:

- Tour units/facility, if applicable. Site/unit visits are conducted to evaluate the physical adequacy of the housing provided.

- Review and discuss most recently submitted APR and most recent correspondence from the Prioritization Committee, including goals and progress.
- Review random sample of program files: Comprehensive file review will be completed on at least one file, with other files reviewed if necessary.
- Review results of client satisfaction survey and/or conduct client interviews. Arrangements for client interview will be made in advance of the visit.
- Identify technical assistance needs (from Continuum of Care or other source).

After the site/monitoring visit, a written summary of the visit will be provided to the grantee.

The grantee will then have fourteen (14) days to respond in writing to the visit summary report.

The Leadership Team will review the summary and any written responses from the grantee.

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

If, based on project performance and the grantee's written explanation, the Leadership Team has continued performance concerns; the Leadership Team will draft recommendations to address identified concerns. Timelines for corrections and follow-up visits are anticipated to be sixty (60) days or less, but will be defined on a case-by-case basis in the approved recommendations. Correspondence will be made available to the Prioritization Committee.

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

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

Following annual site visits, the CoC Lead agency issues monitoring review reports for each sub-recipient. Monitoring review reports will include any findings as well as required corrective action. Sub-recipients have 60 days to implement corrective action. Per their contract, sub-recipients could have funds de-obligated for failure to correct findings.

The CoC Lead agency conducts an initial on-site monitoring visit after the first quarter to identify potential concerns. Should the CoC Lead agency identify a concern that the sub-recipient cannot overcome and that will result in a violation of the contract, the CoC Lead will recommend that the funds be diverted to other agencies.

ESG Recipient Monitoring

The Continuum of Care will work with ESG funders to coordinate the monitoring of outcomes of recipients of ESG funding. The CoC Lead agency will monitor ESG sub-recipients' activities to assure compliance with applicable Federal requirements and to determine whether or not performance goals are being achieved.

Written Standards

In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, the Continuum of Care must establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:

1. Policies and procedures for evaluating overall eligibility for CoC assistance and eligibility
2. Policies and procedures for evaluating eligibility for Transitional Housing assistance and for prioritizing which eligible individuals or families will receive TH
3. Policies and procedures for evaluating eligibility for Rapid Re-Housing assistance and for prioritizing which eligible individuals or families will receive RRH
4. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid re-housing assistance
5. Policies and procedures for determining and prioritizing which eligible individuals or families will receive Permanent Supportive Housing assistance

The City of Amarillo has developed the following standards, policies, and procedures for providing assistance with Emergency Solutions Grant (ESG) funds as required by 24 CFR 576.400 (e). These are initial standards that have been created in coordination with the Amarillo Continuum of Care.
These standards represent goals for providing services for the community and the entire continuum. These standards are in accordance with the interim rule for the Emergency Solutions Grant program released by the U.S. Department of Housing and Urban Development on December 4, 2011 and the final rule for the definition of homelessness also released by the U.S. Department of Housing and Urban Development on December 4, 2011.

I. EVALUATING PARTICIPANT ELIGIBILITY

Case managers will utilize intake assessment forms to review client situation, understand eligibility and begin the process of determining length of assistance. Any client assessed for potential assistance with ESG funds must meet the criteria to become eligible for homelessness prevention or rapid re-housing assistance. Any new client entering into shelter must also undergo an assessment to understand client needs and barriers and match the client to the most appropriate services provider. The following outlines the individual characteristics of clients qualifying for homeless prevention or rapid re-housing.

Homeless Prevention
Any client receiving assistance must have proof of residence within the city limits of Amarillo, Texas.

Total household income must be below 30 percent of Amarillo Median Family Income (MFI) at initial assessment. Clients must provide documentation of household income, including documentation of unemployment and a zero income affidavit for clients without income; AND
Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place not meant for human habitation.

Additionally, all clients must meet one of the following HUD criteria for defining at risk of homelessness for individuals or families:
• Has moved because of economic reasons 2 or more times during the 60 days immediately preceding application for assistance; OR
• Is living in the home of another because of economic hardship; OR
• Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
• Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
• Lives in an SRO 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 one and a half persons per room; OR
• Is exiting a publicly funded institution or system of care.

Rapid Re-Housing
Any client receiving rapid re-housing assistance must meet the HUD criteria for determining homelessness as either literally homeless or fleeing/attempting to flee domestic violence.
Category 1 – Literally Homeless is an individual or family who lacks a fixes, regular, and adequate nighttime residence, meaning:
• Has a primary nighttime residence that is a public or private place not meant for human habitation; OR
• Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels/motels paid for by charitable organizations or by federal, state and local government programs); 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 immediately before entering that institution.

Category 2 – An individual or family is at Imminent Risk of Homelessness if they will imminently lose their primary nighttime residence, provided that:
• Residence will be lost within 14 days of the date of application for homeless assistance; AND
• No subsequent residence has been identified; AND
• The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Category 3 – Persons may be defined as homeless under other federal statutes if they are 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:
• Are defined as homeless under the other listed federal statutes; AND
• Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; AND
• Have experienced persistent instability as measured by two moves or more during the preceding 60 days; AND
• Can be expected to continue in such status for an extended period of time due to special needs or barriers.

Category 4 – Any individual or family who:
• Is fleeing, or is attempting to flee, domestic violence; AND
• Has no other residence; AND
• Lacks the resources or support networks to obtain other permanent housing.

<u>Shelter Clients</u>
Homeless clients entering into the shelter system must meet the HUD criteria for homelessness as either literally homeless, at imminent risk of homelessness, homeless under another federal statute, or fleeing/attempting to flee domestic violence.

II. ADMISSION, DIVERSION, REFERRAL AND DISCHARGE BY EMERGENCY SHELTERS
Shelter stays should be avoided, if possible, and when not possible, limited to the shortest time necessary to help participants regain permanent housing. ESG subrecipients must conduct an initial evaluation of all individuals or families to determine if they should be admitted to an emergency shelter, diverted to a provider of other ESG-funded components, such as rapid re-housing or homeless prevention assistance, or referred for other mainstream resources.
ESG subrecipients must also reassess emergency shelter participants on an ongoing basis to determine the earliest possible time that they can be discharged to permanent housing. All persons discharged from emergency shelters will have their exit status entered into HMIS and will be provided discharge paperwork as applicable or upon request.

III. ASSESSING, PRIORITIZING AND REASSESSING PARTICIPANTS NEEDS FOR ESSENTIAL SERVICES RELATED TO EMERGENCY SHELTER
ESG providers and the City of Amarillo, Community Development staff are currently working with the Amarillo CoC to develop common intake and assessment tools and protocols to be used by all agencies that receive ESG, CoC and other homeless program funding within the Continuum. The tools and protocols will create consistency in client intake and assessment and provide basis for appropriate agency referral and to develop targeting and prioritization protocols.

ESG funding may be used to provide essential services to individuals and families who are in an emergency shelter. Essential services for participants of emergency shelter assistance can include case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.
(*NOTE: The Amarillo 2014 ESG budget currently has allocated emergency shelter funds to operations only, but amendments to the budget can occur should it be determined that essential services are not being met through other non-ESG resources in the community.)

ESG sub-recipients are responsible to assess an individual or family's initial need for emergency shelter and must reassess their need on an ongoing basis. Shelters that serve families must serve all eligible families and may not refuse services based on the age of children or the size of the family. Client reassessment will take place at the participant level and at the service provider level. Clients meet with case managers throughout their participation in the program and have regular progress evaluations. Clients have opportunity to provide feedback and assessment about programs and services as well.

IV. COORDINATION AMONG EMERGENCY SHELTER PROVIDERS, ESSENTIAL SERVICE PROVIDERS, HOMELESS PREVENTION AND RAPID RE-HOUSING PROVIDERS, OTHER HOMELESS ASSISTANCE PROVIDERS, MAINSTREAM SERVICES, AND HOUSING PROVIDERS

The primary coordinative body for implementation of the ESG program will begin with the Amarillo Continuum of Care and the Amarillo Coalition for the Homeless. The CoC and Coalition meet monthly and have a diverse membership of housing service providers, support service providers, government

agencies, and private/public organizations. The Coalition also hosts guest speakers on a regular basis to discuss new initiatives or to address concerns raised by the
Continuum and/or program participants. The Continuum also has subcommittees to spearhead special initiatives such as drafting policies, forms and evaluation tools for review by the membership. The Continuum is consulted to identify annual ESG funding priorities, recommend programs that meet funding priorities, and participate in monitoring to help evaluate ESG agency performance.

ESG sub-recipient will coordinate with referral agencies such as the United Way 211 to link clients in need of housing assistance to other services and shelter, and must have a strong knowledge and working relationship with local social service agencies, employment centers, shelter providers and supportive service programs (i.e. food pantries, transportation, health care, daycare, medical, legal, credit counseling, etc.)

Additionally ESG sub-recipients must have a strong knowledge and working relationship with other agencies targeting housing services for homeless/low-income families including but not limited to Shelter Plus Care, Supportive Housing Program, Veterans Assistance Supportive Housing, Community Housing Development Organizations, and Section 8 Housing Choice Voucher.

V. CLIENT PRIORITIZATION FOR HOMELESS PREVENTION AND RAPID RE-HOUSING
The City of Amarillo prioritizes clients who are currently in their own housing, especially families with young children who have limited housing options but high needs for homelessness prevention funding. The City of Amarillo anticipates targeting families with children as the most likely recipients for rapid re-housing assistance in line with the priorities of Opening Doors: The Federal Strategic Plan to Prevent and End Homelessness. Individuals will not be excluded from receiving homeless prevention or rapid re-housing assistance.

VI. TARGETING AND PROVIDING ESSENTIAL SERVICES REALTED TO OUTREACH.
The City of Amarillo does not target ESG funding to any geographic area or client populations. ESG sub-recipients are selected through a request for proposal process based on service provision. No duplication of service by sub-recipients is anticipated in the Amarillo area of operation.

ESG funding may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term, "unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1)(i) of the "homeless" definition under 24 CFR Part 576.2. As outlined in 24 CFR Part 576.101, essential services consist of:
i. Engagement;
ii. Case management;
iii. Emergency health services – only when other appropriate health services are inaccessible or unavailable within the area;
iv. Emergency mental health services – only when other appropriate mental health services are inaccessible or unavailable within the area;
v. Transportation; and
vi. Services for special populations.

ESG subrecipients must determine an individual's or family's vulnerability and unwillingness or inability to access emergency shelter, housing, or an appropriate health facility, prior to providing essential services under this component to ensure that ESG funding is used to assist those with the greatest need for street outreach assistance.

(*NOTE: The Amarillo 2014 ESG budget currently has not allocated any funds to the Street Outreach component. Amendments to the budget could occur should it be determined that street outreach services become a priority need and are not otherwise able to be met through other non-ESG resources in the community.)

VII. LENGTH OF STAY, SAFEGUARDS TO MEET SAFETY AND SHELTER NEEDS OF SPECIAL POPULATIONS, PARTICIPANTS WITH HIGH BARRIERS TO HOUSING
Program participants shall be discharged from Emergency Shelter services when they choose to leave or when they have successfully obtained safe, permanent housing. Any Length of Stay limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

Safety and Shelter Safeguards shall be determined by the individual Special Population service provider's policies and clearly communicated to program participants.

Categories of homeless who are determined to have the highest barriers to housing due to a myriad of factors such as a history of chronic homelessness, etc., will be prioritized for existing housing resources and paired with existing supportive services to increase the likelihood of staying successfully housed.

VIII. DETERMINING PERCENTAGE OR AMOUNT OF RENT PARTICIPANTS MUST PAY WHILE RECEIVING HOMELESS PREVENTION OR RAPID RE-HOUSING ASSISTANCE
Each ESG funded agency will be responsible for determining income as a basis of eligibility for services. As part of this income determination the relevant staff person will ascertain the amount that the household is able to contribute towards rental payments. Factors to consider may include: potential upcoming increases/decreases, family size, availability of other resources to meet costs and other factors as determined by the agency staff in consultation with the household.

Each individual agency will decide internally if they will charge participants a set percentage of income, a set percentage of actual rent, or a set dollar amount while receiving ESG services, or if they will provide a phased payment plan dependent on individual household circumstances. Individual agencies may also decide to not have participants pay any rental costs while receiving services. Each participant and landlord will receive written verification of the amount and duration of assistance provided by the agency and rent to be paid by the participant.
As the overall goal of ESG funding is to ensure that households are able to maintain housing independently it is important that each agency properly assess potential households to ensure that they are a good match for the program, and to refer them to more extensive supports as available if the household is not able to maintain housing costs independently.

IX. DETERMINING TYPE, AMOUNT, AND DURATION OF HOUSING STABILIZATION OR RELOCATION SERVICES
Each agency will perform initial screening to determine the number of months that a client will initially receive a commitment of assistance including direct assistance payments and stabilization services. This initial commitment will be in writing and verified by the agency representative and the participant. Factors to take into consideration during the initial commitment are the participant's ability to pay rent

or obtain housing in the immediate month and subsequent months, such as anticipated change in income, time necessary to recover from unexpected expenses, etc.

As the program participant is nearing the end of their initial commitment of assistance, the caseworker will contact the household to assess their need for continued assistance. After a review of the participant's continued eligibility, the caseworker will make a recommendation regarding the receipt of additional rental assistance, and this recommendation will be forwarded to the supervisor for review and approval. In addition to this analysis of additional assistance requirements, each participant will need to recertify each three month period providing the required completed sections of the application forms and back-up verification documents.

X. TERMINATING ASSISTANCE
In general, if a program participant violates program requirements, the sub-recipient may terminate the assistance in accordance with a formal process established by the recipient or sub-recipient that recognizes the rights of individuals affected. The sub-recipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated in only the most severe cases. For example:
• A client will only be terminated if the client or household members have threatened property/staff; or
• If the client has met the maximum number of months of assistance per ESG guidelines, or if the client has stated in writing they no longer want ESG financial assistance or case management; or
• Refusing to participate in the once a month case management requirement.

In each case, the reason for termination must be well documented and approved by a supervisor. To the extent possible, the ESG sub-recipient must identify a subsequent living arrangement for the household with the goal of preventing shelter entrance. In most cases, it is expected that termination would only be completed after the ESG sub-recipient had exhausted all opportunities to increase service plans, revise goals, and identify more suitable housing options. When the client is terminated, he/she should also be given a comprehensive service summary from ESG and list of contact information for places for financial and social service assistance.
Program participants receiving rental assistance or housing relocation and stabilization services. To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum must consist of:
1) Written notice to the program participant containing a clear statement of the reasons for termination;
2) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
3) Prompt written notice of the final decision to the program participant.

Termination under this section does not bar the subrecipient from providing further assistance at a later date to the same family or individual.

ESG Administration
The CoC will maintain written policies and procedures that document:
1. Budgeting the costs to the Collaborative Applicant of administering ESG funds from TDHCA
2. Allocating ESG funds, including ESG funds for administrative costs and for HMIS

3. Selecting ESG sub-recipients
5. Collecting performance and expenditure data from sub-recipients and aggregating it to reflect all State ESG programs within the CoC
6. Reporting performance and expenditure data to TDHCA
7. Receiving reimbursements from TDHCA and disbursing reimbursements to sub- recipients

The CoC has designated the City of Amarillo as the Collaborative Applicant. In that function, the City of Amarillo receives 3% of the total ESG allocation to administer ESG funds from TDHCA.

The CoC Lead Agency has existing, written policies and procedures for administering TDHCA's ESG program. The ESG policies and procedures comply with regulations and include procedures for allocating ESG funds; selecting ESG sub-recipients; collecting and aggregating performance and expenditure data from sub-recipients; reporting performance and expenditure data to TDHCA; receiving reimbursements from TDHCA; and disbursing reimbursements to sub-recipients.