



North Dakota-500 Statewide Continuum of Care Governance Charter and Bylaws

CoC Board Approval: April 29, 2020
CoC Membership Approval: May 6, 2020

Next Review: April 2021

I. Mission

Working together to ensure homelessness in ND is rare, brief, and non-recurring.

II. Overview

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009, codifies into law the Continuum of Care (herein CoC) planning process. The CoC planning body is a group organized to carry out the responsibilities prescribed in the CoC Program Interim Rule. CoC governance responsibilities include:

Planning for and operating the CoC;

Ensuring compliance with HUD requirements and regulations;

Coordinating the implementation of a housing and service system that meets the needs of the individuals and families who experience homelessness, including prevention and diversion strategies, outreach and engagement, coordinated assessment, entry and exit, crisis shelter, emergency shelter, temporary housing, permanent housing, and supportive services; and

Designing and implementing the process associated with applying for HUD CoC Program funds.

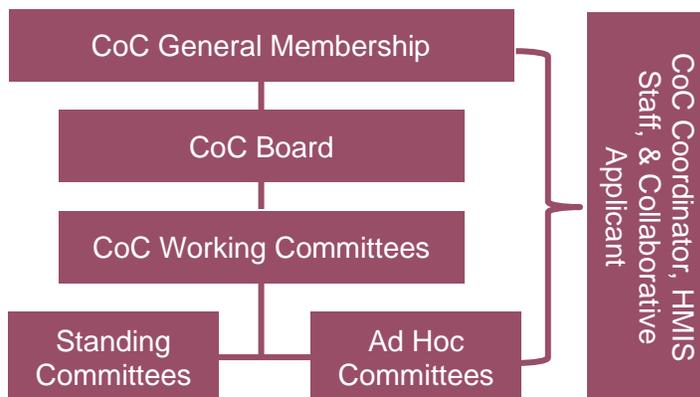
This Governance Charter outlines the roles and responsibilities of the North Dakota Statewide CoC General Membership Committee (herein CoC Membership), CoC Board of Directors (herein Board), Continuum of Care working committee(s), the Collaborative Applicant, and the Homeless Management Information System (HMIS) Lead Agency. This Governance Charter was developed by the CoC Board, Collaborative Applicant, and HMIS Lead Agency with input and feedback from CoC Membership including homeless housing and service providers in the CoC geography.

III. Geographic Area

The CoC geographic area encompasses all 53 counties, its cities, towns, and unincorporated areas, as well as the five federally recognized tribes.

IV. Organizational Structure

The CoC is composed of representatives of relevant public and private organizations that come together to plan for and provide a homeless response system that is dedicated to preventing and ending homelessness in the State of North Dakota. The CoC’s organizational structure is multi-tiered to ensure the opportunity for broad input throughout the state and across stakeholders, while designating staff and leadership to carry out the specific goals and responsibilities of the CoC.



A. General Membership

1. The North Dakota-500 Statewide CoC is the unincorporated organization created to fulfill the responsibilities of the HEARTH Act and serve as the planning body dedicated to organizing the statewide plan to prevent and end homelessness. The CoC Membership Committee ensures a statewide commitment to preventing and ending homelessness and must represent a diverse body of stakeholders geographically and throughout the homeless response system. The CoC will strive to have the following stakeholders represented in its membership:
 - a. Homeless Assistance Providers including CoC and ESG recipients (HUD required)
 - b. Public Housing Authorities (HUD required)
 - c. Persons with Lived Experience (HUD required)
 - d. Educational entities including early education, public schools, (both HUD required) and post-secondary
 - e. Representative from agencies and advocates serving all populations/subpopulations (families, youth, domestic violence, veterans, chronic homeless/disabled, etc.)
 - f. Faith Organizations
 - g. Affordable Housing Owners/Developers
 - h. Funders
 - i. Health and Mental Health Care Providers
 - j. Human/Social Service Providers
 - k. Law enforcement and corrections
 - l. Income, Employment, and Training Programs
 - m. Treatment and Substance Abuse Providers
 - n. Legal Services
 - o. Other relevant and interested parties
2. Responsibilities:
 - a. Provide input into the annual CoC plan
 - b. Provide input into the design and evaluation of the North Dakota homeless response system
 - c. Approve Governance Charter and Bylaws changes
 - d. Elect members to the CoC Board to act on behalf of the CoC at the last full membership meeting of the calendar year
 - e. Approve the HMIS Lead Agency
 - f. Approve the HMIS Vendor
 - g. Approve the CoC Collaborative Applicant

B. Board

1. The Board serves as the HUD designated primary decision-making group and oversight Board of the North Dakota Statewide Continuum of Care. As the oversight committee of the CoC, and its members, the Board will:

- a. Ensure that the CoC is meeting all responsibilities assigned to it by HUD regulations (see below);
 - b. Represent the relevant organizations and projects serving homeless subpopulations;
 - c. Support persons experiencing homelessness in their movement from homelessness to economic stability and affordable permanent housing within a supportive community;
 - d. Ensure that the CoC is inclusive of all needs of the North Dakota Statewide homeless population, including the special service and housing needs of homeless subpopulations; and
 - e. Facilitate responses to issues and concerns that affect the agencies funded by the CoC that are beyond those addressed in the annual CoC application process.
2. **Responsibilities:** *(per Federal Interim Rule 24 CFR 578)* As the designated governing body of the CoC for the geographic area, the Board works with the CoC Collaborative Applicant (North Dakota Housing Finance Agency) to fulfill three major duties:
- a. Operate the CoC, which must:
 - Hold meetings of the full membership, with published agendas, at least semi-annually;
 - Make an invitation for new members to join publicly available within the geographic area at least annually;
 - Adopt and follow a written process to select Board members to act on behalf of the CoC. The process must be reviewed, updated, and approved by the CoC Membership at least once every five years;
 - Appoint committees, subcommittees, or workgroups as may be deemed necessary;
 - In consultation with the CoC Collaborative Applicant, develop, follow, and update annually a CoC Governance Charter and present to the CoC Membership for approval;
 - In consultation with the CoC Collaborative Applicant and the HMIS Lead, develop, follow, and update annually all procedures and policies needed to comply with CoC requirements as prescribed by HUD; and a code of conduct and recusal process for the Board, its chair(s), any person acting on behalf of the Board, and the Scoring and Ranking Committee;
 - Consult with recipients and subrecipients of CoC funding to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and act against poor performers;
 - Evaluate outcomes of projects funded under the North Dakota Emergency Solutions Grants program (herein ESG) and the CoC program, and report to HUD;
 - In consultation with the Collaborative Applicant, the HMIS Lead, and recipients of ESG funds, establish and operate a centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services; and

- In consultation with recipients of ESG funds within the geographic area, establish and consistently follow written standards for providing assistance. At a minimum, these written standards must include:
 - Policies and procedures for evaluating individuals' and families' eligibility for CoC assistance;
 - Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
 - Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;
 - Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and
 - When the CoC is designated a high-performing community, policies and procedures for determining and prioritizing which eligible individuals and families will receive Homelessness Prevention Assistance.
- b. Oversee the designated Homeless Management Information System (HMIS):
- Propose a single HMIS for the geographic area to the CoC Membership for approval;
 - Propose an eligible applicant to manage the CoC's HMIS, which will be known as the HMIS Lead Agency (LA);
 - Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS;
 - Ensure consistent participation of recipients and subrecipients of CoC and ESG funding in the HMIS;
 - Ensure the HMIS is administered in compliance with requirements prescribed by HUD; and
 - Ensure that an MOU is in place with the Lead Agency.
- c. Continuum of Care Planning: Ensure the CoC develops a plan that includes:
- Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. At a minimum, such system will encompass the following:
 - Outreach, engagement, and assessment;
 - Shelter, housing, and supportive services;
 - Prevention strategies.
 - Planning for and conducting, at least biennially, a point-in-time count of homeless persons within the geographic area that meets the following requirements:
 - Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons;
 - Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons;

- Annual Housing Inventory Count; and
- Other requirements established by HUD by Notice.
- Conducting an annual gaps analysis of the homeless needs and services available within the geographic area;
- Providing information required to complete the Consolidated Plan(s) within the CoC's geographic area; and
- Consulting with state and local government ESG program recipients for allocating ESG funds and reporting on and evaluating the performance of ESG recipients and subrecipients.

C. CoC Working Committees

1. Standing Committees: The CoC has four standing committees to support the CoC in achieving its goals and responsibilities with at least one CoC Board member serving as liaison to each committee. These include:
 - a. System Performance is a standing committee under the oversight of the Board. The committee is responsible for:
 - Taking the lead in establishing performance measures for ESG and CoC Programs.
 - Reviewing outcomes for ESG and CoC Programs.
 - Regularly monitoring system-wide performance targets and leading discussion on updating/adjusting measures.
 - Providing input to data committee on desired data input.
 - b. Data is a standing committee under the oversight of the Board. The Data Committee is responsible for:
 - Conducting an annual count of both sheltered and unsheltered homeless persons;
 - Monitoring the Homeless Management Information System (HMIS) in coordination with the Collaborative Applicant;
 - Reviewing and making recommendations for improved data quality and completeness;
 - Annually review program's HMIS privacy, security, and data quality;
 - Assure HMIS is administered in compliance with HUD; and
 - Collect and provide data needed for regional and statewide planning.
 - c. CARES is a shared committee under the oversight of the Board with joint leadership from the West Central Minnesota Continuum of Care and the White Earth Tribe. Members are elected by the CoC. CARES is responsible for:
 - Supporting the CoC in assuring the region has a Coordinated Assessment (CA) system that is compliant with HUD and state policies/regulations. This includes:
 - Conducting annual reviews of system design, policies, and outcomes, and making recommendations for improvements;
 - Supporting CoC leadership in establishing communication, structure, policies and training materials that support compliance with HUD regulations; and

- Promoting CARES compliance and implementation across the state.
- d. Rating and Ranking is a standing committee under the oversight of the Board. The Rating and Ranking Committee is responsible for:
- Updating CoC polices for the annual HUD Continuum of Care Competition and presenting them to the CoC Board and CoC Membership for vote;
 - Conducting an annual review of all projects applying for the HUD Continuum of Care Competition using established criteria;
 - Ranking projects according to criteria and placing them in a recommended funding order by tier and presenting ranking recommendations to the CoC Board and membership for vote.
2. Sub-Committees/Groups: Ad Hoc working groups, task forces, and sub-committees may be created as needed by the Board. Minutes of these committees/groups will be presented to the Board. When possible, a Board member or the CoC Coordinator should be present.

D. Collaborative Applicant

1. The CoC Collaborative Applicant is required by HUD to submit an annual Consolidated Application. The CoC will approve a Collaborative Applicant and enter into a Memorandum of Understanding (MOU) signed by the CoC Chair.
2. **Responsibilities:** The Collaborative Applicant (CA) will help carry out the responsibilities of the CoC. Specific duties will be laid out in the MOU, but generally include:
 - a. Hire a CoC Coordinator and other staff as necessary;
 - b. Lead in the development of the annual HUD Consolidated Application;
 - c. Manage the CoC annual calendar, email list, and website;
 - d. Provide guidance and support to the CoC planning process and leadership.
 - e. Support compliance with the HEARTH Act and other HUD polices, rules, or regulations related to operating a CoC, homeless response system or Homeless Management Information System (HMIS).
3. The designation of the CA is valid for a maximum of five years (2020, 2025, 2030, . .) before the designation must be reviewed and renewed by the CoC Board. No requirement for a Request for Proposal (RFP) will be made if no other agencies are interested and this step is unnecessary. In response to negligence or poor performance of the CoC CA, the CoC reserves the right to open an RFP process prior to the five-year mark and designate a new CoC CA.
4. **Record Keeping.** The Collaborative Applicant is responsible for keeping records documenting compliance with HUD requirements, including evidence that:
 - a. The CoC Board meets the requirements of the CoC Program Interim Rule, including:
 - Approved copy of a governance charter establishing the Board and including a written process to select a Board that is reviewed and updated at least every five years; and
 - Board roster (or similar) showing that it is representative of the relevant organizations and of projects serving homeless subpopulations and that it includes at least one homeless or formerly homeless individual.

- b. The CoC has been established and operated as set forth in the CoC Regulations, including:
 - Published agendas and meeting minutes;
 - Evidence of designation of a single HMIS for the CoC; and
 - Monitoring reports of recipients and subrecipients.
- c. The CoC has prepared the application for funds in compliance with the CoC Program Interim Rule.
- d. The Board is compliant with HUD's conflict of interest requirements, including having a conflict of interest policy signed by all members.

E. HMIS Lead

- 1. The CoC must designate a legal entity who is also a Continuum of Care Program eligible applicant to serve as the HMIS Lead.
- 2. **Responsibilities:** The HMIS Lead will maintain the community's HMIS in compliance with HUD standards and coordinate all related activities including training, maintenance, and the provision of technical assistance to contributing organizations. Specific responsibilities required by the Continuum of Care Interim Rule and any additional responsibilities are documented in the Homeless Management Information System Lead Memorandum of Understanding.
- 3. The designation of the HMIS Lead is valid for a maximum of five years before the designation must be reviewed and renewed by the CoC Board. No requirement for a Request for Proposal (RFP) will be made if no other agencies are interested and this step is unnecessary. In response to negligence or poor performance of the HMIS Lead, the CoC reserves the right to open an RFP process prior to the five-year mark and designate a new HMIS Lead.

F. CoC Coordinator

The CoC Coordinator provides guidance and direct support to the North Dakota CoC Board in carrying out CoC planning and compliance activities.

V. Membership

A. General Membership

- 1. The membership of the Continuum of Care is defined as those persons and organizations participating in the work of the CoC through committee or workgroup service, planning, other relevant stakeholders; or those who are experiencing homelessness (24CFR Subpart B 578.5) who sign an annual membership agreement committing to regular participation and representation at all CoC meetings.
- 2. All members must sign a Code of Conduct/Conflict of Interest document as part of an annual membership agreement. While membership is open throughout the year, the CoC will conduct an annual membership drive in alignment with the annual meeting each year.
 - a. Code of Conduct. Commitment and professionalism are vital to creating and maintaining an effective and efficient Continuum of Care (CoC) process that will benefit each member of the CoC, as well as the persons they represent. Both are integral to creating and sustaining a strong and collaborative planning process. Conduct obligations include:
 - Members should represent their clients, their agencies, and the CoC in a fair, honest, ethical, and respectful manner.

- Members should be informed on the purpose of the CoC and its role in the regional planning to end homelessness.
- Members should strive to stay up to date on CoC strategies and planning.
- Members should strive to keep their promises and to avoid unwise or unclear commitments that they are unable to fulfill.
- Members are expected to uphold professional standards of conduct, exhibiting respectfulness, fairness, and honesty.
- Members should clarify their professional roles and obligations, exercise reasonable judgment, and take precautions to ensure that any potential biases or conflicts of interest do not unjustly affect the CoC process or other members of the HTH.
- When conflicts occur among members, they should attempt to resolve these conflicts in a responsible fashion.
- Leaders have the extra responsibility of setting an example by their personal performance and attitude.
- Members should consult with, refer to, or cooperate with other professionals and institutions to the extent needed to serve the best interests of those they represent.

B. Board Membership

1. The Board shall be solicited from and voted on by the CoC Membership. The members will be representatives from each of the eight planning regions within the state, one homeless or formerly homeless member, and up to two members at-large. The CoC shall strive for statewide balance and diversity in the makeup of the Board. The lived experience representative will be entitled to a stipend to support active participation in CoC Board and CoC Membership meetings.
2. The Board shall also include non-voting advisory and staff members including: the CoC Coordinator, Collaborative Applicant representative, HMIS/Lead Agency representative, NDCHP representative, and North Dakota Department of Commerce representative (concerning state homeless programs).
3. Officers: The CoC Membership shall elect a chairperson, a chair elect, and a secretary with terms not to exceed two years ending in December. Officers serve in this capacity for both the membership and the CoC Board.
 - a. Duties of the Chairperson: The Chairperson shall preside at meetings of the CoC Membership and Board Committees.
 - b. Duties of the Chair elect: The Chair elect shall preside at meetings of the CoC Membership and Board in the absence of the Chair.
 - c. Duties of the Secretary: The secretary shall take and maintain minutes of the CoC Membership and Board or appoint another note taker in their absence.
4. Elected Member Terms
 - a. Each elected member shall serve a term of two years ending in December. Terms will be staggered so half of the voting members are appointed in one year and half are appointed in the year thereafter. Each member shall be eligible for re-election to up to two terms for a total of four years. After completion of two consecutive terms, a person can be elected to a new term after a minimum of a one-year absence.

- b. Vacancies: Vacancies occurring on the Board shall be filled, as soon as reasonably possible, by appointment of the CoC Board. Persons appointed to fill an unexpired term shall serve out the unexpired term of his or her predecessor in office and be eligible to stand for election for two full terms.
 - c. Attendance: Attendance at meetings is strongly encouraged and can be either in-person or virtual/electronic.
 - d. Removal: An appointee who misses three successive Board meetings or consistently fails to attend or participate may be removed from the Board by a vote of its membership or by the Board.
5. Regional Representative Roles and Responsibilities: Regional Board Representatives serve as a liaison between your region and the CoC, representing regional issues at CoC Board and CoC Membership meetings, while simultaneously considering the overall goals and purpose of the CoC. Additionally, representatives are responsible for relaying timely and pertinent information and promoting CoC goals and policies within your region.

VI. Meetings

- A. All meetings shall be held at the call of the chair or vice chair.
- B. In the absence of a presiding officer, the chair may appoint a member as acting chair.
- C. Notice of time and location of all meetings shall be delivered personally or by email to all members at least four days prior to the meeting; or by U.S. Postal Service at least six business days prior to the meeting.
- D. CoC Membership Meetings shall be held quarterly throughout the year. Quarterly meetings will occur in February, May, August, and November with the annual meeting being held in November.
- E. A virtual/electronic option for attendance shall be available at all Board and CoC Membership meetings.
- F. Meetings shall be held in accordance with Robert's Rules of Order.
- G. The CoC Coordinator or the Board Chair will develop an agenda for each meeting.
- H. Meeting minutes will be recorded for each meeting by the Secretary. In the absence of the Secretary another member shall be designated to record minutes.

VII. Voting

A. CoC General Membership

- 1. All member agencies shall have one vote per agency.
- 2. In the instance of a tie, the vote of the Chair or acting Chair will be voided to break the tie.
- 3. Electronic Voting: At the discretion of the Chair, virtual/electronic voting shall be allowed to ease the challenge of making leadership decisions between meetings or when timing or travel is unrealistic for one or more members. The voting period and required response date shall be prominently posed in the request for vote.
- 4. A quorum for the transaction of any business by the Committee shall be a simple majority of the non-vacant seats on the Committee.

B. Board

- 1. All Board members shall have one vote. NDCHP, CoC, HMIS, and North Dakota state government staff or representatives shall not vote but may share input on

matters requiring a vote. In the instance of a tie, the vote of the Chair or acting Chair will be voided to break the tie.

2. Electronic Voting: At the discretion of the Chair, virtual/electronic voting shall be allowed to ease the challenge of making leadership decisions between meetings or when timing or travel is unrealistic for one or more members. The voting period and required response date shall be prominently posed in the request for vote.
3. A quorum for the transaction of any business by the Board shall be a simple majority of the non-vacant seats on the Board.
4. Members of the Board who are aware of an actual or potential conflict of interest must recuse themselves from the related decision-making process and take no part in the discussion or the vote. Members must advise the Chair that he or she wishes to be recused from the decision-making process, the Chair will honor the Member's decision, and the recusal will be noted in the minutes.

A conflict of interest would occur in any discussion or decision concerning the award of a grant or other financial benefit to the organization that the member represents.

VIII. CoC Policies and Procedures

The following policies have been approved by the CoC and reflect the current practice and expectations of CoC member agencies. The CoC Governance is responsible for setting, updating, and informing members on the current CoC Policies and Procedures. Current policies and procedures are located on the CoC website.

- A. CoC Policies and Procedures include:
- B. Coordinated Entry Policies
- C. CARES Prioritization Policy (Addendum A)
- D. HMIS
- E. HMIS Policies and Procedures (Addendum B1)
- F. Lead Agency Memorandum of Understanding (Addendum B2)
- G. Written Standards for the Administration of ESG and CoC Assistance (Addendum C)
- H. NOFA Policies
- I. Reallocation Policy (Addendum D1)
- J. Ranking & Review Policy (Addendum D2)

IX. Reviewing and Updating this Charter

- A. Once every year the CoC Board or appointed committee/workgroup must review this Governance Charter. Annual review shall be completed at least two months prior to the annual meeting with the recommended updates presented to the full CoC Membership at least 15 days prior to the annual meeting. A simple majority is required by the CoC Membership at the annual meeting to approve changes.
- B. While suggested updates may come from the CoC Membership, CoC Committees, CoC Board, CoC staff, Collaborative Applicant, or HMIS Lead Agency, it is the Lead Agency's responsibility to review HUD rules, regulations, and guidance for necessary updates.

ADDENDUM A – CARES PRIORITIZATION POLICY

To assure compliance with HUD mandates, better manage use of limited funds, and assure those least likely to resolve homelessness on their own are served first, the West Central and North Dakota Continuums of Care have adopted the following prioritization policies for CARES.

I. Prevention

All designated CARES partners shall use the CoC Approved Prevention Screening Tool to target households who are most likely to enter homelessness without assistance AND direct households to the most appropriate funder.

A. Order of Prioritization: After screening for funder criteria and agency capacity (availability of funding to assist new households), households will be selected in the following order:

- Vulnerability based on approved prevention tool:

Type of Agency/Program	Level of Acuity
Social Service Providers	High
	Medium
Churches/Mainstream Resources	Low

- Handling Ties: If two or more persons/households have equal vulnerability scores/criteria
 - Program mission/capacity: example, domestic violence, veterans, medical
 - Age: youth (under 26) or senior (55 or older)

B. Process:

1. If households are currently housed and will be homeless without intervention, screening tool will be administered.
2. The tool is entered in HMIS (MN) or Google Docs (both MN & ND) for clients who have been screened and are awaiting referral to prevention funder.
3. Applications will be reviewed bi-monthly at minimum.
4. **Offer:**
 - a. All clients will be notified within 7 business days of acceptance or denial.
 - b. Client choice should be provided when available and applicable (provided eligibility and prioritization criteria is met).
 - c. Agencies must contact client a minimum of three times and wait at least one week before closing referral.
 - If client does not respond within time frame and three contacts they will be given a phone call or letter stating referral is closed.
 - If client returns after referral time frame has passed, they will need to re-apply or their application will be re-submitted.
5. **Providers Right to Refusal:** Providers maintain the right to refuse a client if there has been past documented incidents working with that client where there was potential harm to the service provider or if there is documented conflict of interest (provider is relative of client, there is a lawsuit pending against client/agency).
 - a. Providers refusing clients must complete the CARES denial form and submit to CoC Coordinator within three days of service denial.
6. **Verification of eligibility:** Projects are required to keep documentation eligibility for clients that enter into programs.

II. Shelter

All designated CARES partners shall use the CoC Approved Shelter Screening Tool to target households who are most vulnerable AND direct households to the most appropriate shelter or motel voucher resource.

A. Process:

1. If not already completed, conduct initial access screen and CARES diversion. The emergency shelter assessment should only be conducted on those who were triaged at an access site, which resulted in referring to emergency shelter resources, after attempts at diversion were unsuccessful.
2. Once a household is identified as needing emergency shelter, the CoC approved Emergency Shelter Assessment must be used to prioritize emergency shelter resources.
3. Enter assessment in Podio (Cass & Clay Counties only).
4. When an opening occurs, fill voucher or bed/room according to order of priority.
5. Due to the limited number and emergency nature of shelter beds, reasonable attempts should be made to contact a household, but regional planners shall have the discretion to move to the next household to ensure that no resources are being unused due to being unable to contact household.

NOTE on Shelter Eligibility: Shelter Eligibility is based on funder restrictions (domestic violence, youth) or target population preference (youth, singles, families, women, men). Preference restrictions are revised based on CoC or sub-regional planning needs.

B. Order of Priority: Emergency Shelters resources must fill open beds by the highest vulnerability. This includes hotel vouchers and shelter bed openings. Assessments score on a range from 0-6, with 6 being the most vulnerable. After shelter eligibility and openings are determined, beds/rooms shall be filled in the following order:

1. **Communities with limited demand** and resources must regionally identify how they would want to prioritize their resources. Example: Emergency hotel vouchers can only be issued to those who score above a 4 on the emergency shelter assessment.
2. **Communities who have high emergency shelter demand and/or who have had a wait list in the last 30 days** must prioritize based on the following:
 - a. Vulnerability score
 - b. Length of time on the wait list
 - c. Accessibility

III. Supportive Housing

All designated CARES housing programs must fill open units based on the Prioritization Policy which prioritizes supportive housing to households based on vulnerability, system use, client choice and local preferences. CARES utilizes the VI-SPDAT plus Preference Supplement (client choice, local preference, and additional program eligibility screening questions) as the primary source to determine priority, but also relies on case consulting and provider expertise to triage households when needed.

A. Process:

1. When a housing opening occurs, agencies will notify the CARES Priority List Manager (PLM) within three days.
2. The PLM will sort the CARES Priority List according to program eligibility, program type, and score and provide the agencies with a list of households.
3. Agencies will have up to five days to contact the household and make an offer.
 - a. Agencies must contact referrals a minimum of three times and if unable to make contact, wait at least two weeks before closing the offer.
 - Agencies are responsible for assuring that attempts to contact referrals include: original assessor, case managers, email, phone, back-up phone, and alternative contact.
 - Agencies must record attempts in HMIS or to report Priority List Manager if across CoC borders or non-HMIS agency.
 - If client does not respond within time frame and three contacts, they will be given a phone call or letter stating the offer is closed.
 - If client returns after the offer time frame has passed, they will need to update their contact information and will be placed back on the priority list.
 - b. Agencies have the right to refuse to make an offer if there is a conflict of interest or if there is a safety concern. CARES staff must be notified within three days of a denial.
4. Households have the right to refuse any referral but must document why they refused and must meet with the CARES staff after three denials to be placed back on the Priority List.
5. If not already complete, agencies must verify eligibility prior to enrollment.

B. Order of Priority: Households will be selected based on the following criteria after meeting program eligibility.

Within the score range for each intervention type, selection will first follow the Order of Selection/Prioritization, prioritizing the highest VI-SPDAT score in each selection category.		
TYPE	SCORE RANGE	ORDER OF SELECTION/PRIORITIZATION
Transitional	Singles and Youth 4-7 Families 4-8	<ol style="list-style-type: none"> 1. Category 1: Unsheltered 2. Category 1: Other 3. Category 4 4. Category 3: Youth programs ONLY 5. Category 2 6. Unsafely or unstably doubled up (MN OEO only)
Bridges	Singles and Youth 4-7 Families 4-8	<ol style="list-style-type: none"> 1. Category 1: Exiting an institution 2. Category 1: Other 3. Category 2
Rapid Re-Housing	Singles and Youth 4-7 Families 4-8	<ol style="list-style-type: none"> 1. Category 1: Unsheltered 2. Category 1: other 3. Category 4 4. Category 2 5. Unsafely or unstably doubled up (MN OEO only)

Note: For the following, the first order of prioritization must be chronic homeless. Within the score range for each intervention type, selection will first follow the Order of Selection/Prioritization, prioritizing the highest VI-SPDAT score in each selection category.

High Priority homeless (formerly long-term homeless) <u>without supports</u>	Singles/Youth 8-12 Families 9-14	<ol style="list-style-type: none"> 1. Category 1: Unsheltered 2. Category 1: other 3. Category 4 4. Category 2 5. Category 3 6. Unsafely or unstably doubled up
Housing Supports: LTH	Singles/Youth Families 4+	<ol style="list-style-type: none"> 1. Category 1: Unsheltered 2. Category 1: other 3. Category 1: Exiting an institution 4. Category 2: Exiting an institution 5. Category 4 6. Category 2 7. Category 3 8. Unsafely or unstably doubled up
Permanent Supportive Housing & High Priority Homeless (formerly Long-term Homeless)-with supports NOTE: PSH must have disability	Singles/Youth 8+ Families 9+	<ol style="list-style-type: none"> 1. Category 1: Unsheltered & Disabled 2. Category 1: Emergency Shelter & Disabled 3. Exiting TH: entered as homeless with a disability 4. Highest priority homeless

C. Tie Breakers: If all else is equal the following prioritization criteria will be used:

1. Longest period of time homeless
2. Veterans
3. Tri-morbid
4. Age: Persons under age 24 or over age 50 years
5. Length of time on the list

D. Special Cases:

1. Households who have enrolled in a program through CARES but require a more intensive housing intervention may be immediately prioritized for the next opening to prevent re-entering homelessness.
2. Households who have been enrolled through CARES or through CES in another MN CoC but are required to move due to extenuating circumstances (employment, health, violence, treatment or education), will be prioritized for the next available opening.

E. Programs Needing to follow CARES policy

TYPE	NORTH DAKOTA PROGRAMS
Prevention	Presentation Partners in Housing Salvation Army of Cass-Clay Southeastern ND Community Action Agency Abused Adult Resource Center Aid Inc. Community Violence Intervention Center Dakota Prairie Community Action Agency Northlands Rescue Mission St. Joseph's Social Care Salvation Army-Bismarck Salvation Army-Jamestown YWCA Cass Clay Community Action Program Region VII Native American Development Center Presentation Partners in Housing Red River Valley Community Action St. Joseph's Social Care
Emergency Shelter	Gladys Ray Shelter Fraser, Ltd. - Seasonal Shelter New Life Center Youthworks YWCA Cass Clay Abused Adult Resource Center Community Violence Intervention Center Domestic Violence & Abuse Center (Grafton) Domestic Violence & Rape Crisis Center, Inc. Women's Alliance Domestic Violence Crisis Center (Minot) Family Crisis Shelter Inc. Fraser, LTD. Mercer County- Women's Action and Resource Center Minot Area Men's Winter Refuge Missouri Slope Areawide United Way Northland Rescue Mission Red River Valley Community Action Safe Alternatives for Abused Families St. Joseph's Social Care Welcome House, Inc. YWCA of Minot
Transitional	Centre, Inc. - Project HART Youthworks Centre, Inc. YWCA Cass Clay Domestic Violence & Rape Crisis Center, Inc. Women's Alliance Abused Adult Resource Center
Rapid Re-Housing	Southeast North Dakota Community Action Agency Gladys Ray Shelter Presentation Partners - Housing Navigation YWCA Cass Clay Abused Adult Resource Center Community Violence Intervention Center Missouri Slope Area Wide United Way Northlands Rescue Mission

	<p>Safe Alternatives for Abused Families St. Joseph's Social Care Salvation Army-Bismarck Salvation Army-Jamestown YWCA of Minot YWCA Cass Clay Youthworks Native American Development Center Presentation Partners in Housing Red River Valley Community Action Safe Alternatives for Abused Families Community Violence Intervention Center</p>
Permanent Supportive Housing	<p>Fargo Housing & Redevelopment Authority Fargo Housing & Redevelopment Authority -Cooper House Fraser, Ltd. YWCA Cass Clay Red River Valley Community Action ND Dept of Commerce- SPC</p>
TYPE	WEST CENTRAL MN PROGRAMS
Prevention	<p>CAP LP Mahube-Otwa Community Action Presentation Partners in Housing Salvation Army of Cass-Clay West Central MN Communities Action (WCMCA)</p>
Emergency Shelter	<p>Churches United for the Homeless (CUFH) Dorothy Day Mahube-Otwa Motel Vouchers WCMCA Action Motel Vouchers</p>
Transitional	<p>CUFH Housing Supports CAP LP HYA Homework Starts with Home Mahube-Otwa HYA Mahube-Otwa THP WCMCA THP White Earth THP</p>
Bridges	BCOW Bridges
Rapid Re-Housing	<p>CAP LP RRH Mahube-Otwa RRH SSVF WCMCA RRH</p>
Housing Supports-scattered site	<p>Clay County HRA Bright Sky West Central Communities Action</p>
Permanent Supportive Housing & Long-term Homeless with Supports	<p>Bright Sky Apartments Gateway Gardens Homeless To Housed HRA CARES Lakes & Prairies PSH Mahube-Otwa ELHF Dream Catcher Homes West River Townhomes White Earth Homes</p>



Homeless Definition

CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u> (iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>and</u> (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	<p>(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; <u>and</u> (iii) Lacks the resources or support networks to obtain other permanent housing



Homeless Definition

RECORDKEEPING REQUIREMENTS 	Category 1	Literally Homeless	<ul style="list-style-type: none"> • Written observation by the outreach worker; <u>or</u> • Written referral by another housing or service provider; <u>or</u> • Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; • For individuals exiting an institution—one of the forms of evidence above <u>and</u>: <ul style="list-style-type: none"> ○ discharge paperwork <u>or</u> written/oral referral, <u>or</u> ○ written record of intake worker’s due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution
	Category 2	Imminent Risk of Homelessness	<ul style="list-style-type: none"> • A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u> • For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay; <u>or</u> • A documented and verified oral statement; <u>and</u> • Certification that no subsequent residence has been identified; <u>and</u> • Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing
	Category 3	Homeless under other Federal statutes	<ul style="list-style-type: none"> • Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; <u>and</u> • Certification of no PH in last 60 days; <u>and</u> • Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; <u>and</u> • Documentation of special needs <u>or</u> 2 or more barriers
	Category 4	Fleeing/ Attempting to Flee DV	<ul style="list-style-type: none"> • <i>For victim service providers:</i> <ul style="list-style-type: none"> ○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. • <i>For non-victim service providers:</i> <ul style="list-style-type: none"> ○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; <u>and</u> ○ Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u> ○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

ADDENDUM B1 – HMIS POLICIES AND PROCEDURES

I. Introduction

The North Dakota Homeless Management Information System (HMIS) is a collaborative project of the North Dakota Continuum of Care (herein CoC), the HMIS Lead Agency (herein HMIS Lead), and participating Partner Agencies (herein Agencies/Agency). HMIS is an internet-based database that is used by homeless service organizations across North Dakota to record and store client-level information about the numbers, characteristics, and needs of persons at-risk of and experiencing homelessness. WellSky Community Services (herein WellSky) administers the central server and HMIS software, and the HMIS Lead administers user and agency licensing, training, and compliance.

HMIS enables service providers to measure the effectiveness of their interventions and facilitate longitudinal analysis of service needs and gaps within the CoC. Information that is gathered from clients via interviews conducted by service providers is analyzed for an unduplicated count, aggregated (void of any identifying client level information) and made available to policy makers, service providers, advocates, and consumer representatives. Data aggregated from HMIS about the extent and nature of homelessness in the state of North Dakota is used to inform public policy decision aimed at addressing and ending homelessness at local, state, and federal levels.

This document provides the policies, procedures, guidelines, and standards that govern HMIS operations as well as the responsibilities for Designated Agency HMIS contacts and end users.

A. HMIS Benefits

Use of the HMIS provides numerous benefits for service providers, persons at-risk of and experiencing homelessness, and the State of North Dakota.

1. Benefits for service providers:

- a. Provides online real-time information about client needs and the services available for persons at-risk of and experiencing homelessness.
- b. Assures confidentiality by providing information in a secured system.
- c. Decreases duplicative client intakes and assessments.
- d. Tracks client outcomes and provides a client history.
- e. Generates data reports for local use and for state and federal reporting requirements.
- f. Facilitates the coordination of services within an agency and with other agencies and programs.
- g. Provides access to a statewide database of service providers, allowing agency staff to easily select a referral agency.
- h. Better able to define and understand the extent of homelessness throughout North Dakota.
- i. Better able to focus staff and financial resources where services for persons at-risk of and experiencing homelessness are needed the most.
- j. Better able to evaluate the effectiveness of specific intervention, programs, and services provided.

2. Benefits for persons at-risk of and experiencing homelessness:

- a. Intake information and needs assessments are maintained historically, reducing the number of times persons at-risk of and experiencing homelessness must repeat their stories to multiple service providers.
- b. The opportunity to provide intake and life history one time demonstrates that service providers consider the person's time valuable and restores some of the client's dignity.
- c. Multiple services can be easily coordinated and streamlined.

II. Requirements for Participation

A. Responsibility of the HMIS Agency

1. Designated Agency HMIS Contact

- a. Provide updated agency information to the HMIS Lead to update in HMIS.
- b. Ensure that the Agency obtains a unique user license for each user at the Agency who will be using HMIS.
- c. Work with the HMIS Lead to communicate with the Agency when users are unresponsive to requests from the HMIS Lead.
- d. Ensure Agency staff persons receive required HMIS training, review the North Dakota HMIS Policies and Procedures, the Agency Partnership Agreement, and any agency policies which impact the security and integrity of client information.
- e. Ensure that HMIS access is granted only to staff members that have received training, have completed the North Dakota HMIS User Policy Code of Ethics and Responsibility Statement, and are authorized to use HMIS.
 - Administer and monitor data security policies and standards, including detecting and responding to violations of the policies and procedures or agency procedures.

2. Users

- a. Take appropriate measures to prevent unauthorized data disclosure.
- b. Report any security violations.
- c. Comply with relevant policies and procedures.
- d. Input required data fields accurately within five calendar days.
- e. Ensure minimum standard of data quality by accurately answering the Universal Data Elements and required Program Specific Data Elements for every individual entered in HMIS.
- f. Inform clients about the agency's use of HMIS and secure the Release of Information (ROI) needed for sharing client data.
- g. Take responsibility for any actions undertaken with one's username and password.
- h. Complete the required training.
- i. Read the North Dakota HMIS News email newsletter.

B. Partner Agency Requirements

1. Partner Agency Authorization to Access HMIS

- a. The HMIS Lead will review all requests for access from new potential agencies. Requests for HMIS access will be granted to agencies that have a business interest in the HMIS. The HMIS Lead will take into consideration the agency's intent to contribute data into the system or use HMIS data for the following: homeless prevention service provision, referrals to non-homeless services used by persons experiencing homelessness, or data analysis.
 - b. To become a Partner Agency, the agency must complete the Participation Agreement documents listed below.
2. Participation Agreement Documents

Agencies must complete the following documents:

- a. **North Dakota HMIS Agency Agreement** must be signed by each Agency's executive director. The HMIS Lead will retain a digital copy of the agreement and the Agency will retain the original document. The Agency Agreement states the Agency's commitment to adhere to the policies and procedures for effective use of the HMIS.
 - b. **North Dakota User Policy Code of Ethics and Responsibility Statement** lists the policies and responsibilities required by the user. These are signed by the user and are retained by the HMIS Lead. An electronic or a hard copy must be kept by the originating Agency.
3. User Access to the System
- a. The HMIS Lead will determine user access for the user at or below the Case Manager III access level and assign users to the appropriate agency provider. The HMIS Lead will generate usernames and passwords within the administrative function of the software.
 - b. All users must complete training before access to the system is granted by the HMIS Lead.

4. User Requirements

Users must be paid staff or official volunteers of an Agency. An official volunteer must complete a volunteer application with the Agency, undergo Agency training, and record volunteer hours with the Agency. Individuals who are solely contracting with an Agency are prohibited from receiving a user license. All users must be at least 18 years old.

5. Users who are also Clients Listed in HMIS

In order to prevent users from editing their own file or files of immediate family members, all users will agree to a conflict of interest statement that is part of the User Agreement. Users must disclose any potential conflict of interest to their Designated Agency HMIS Contact. Users will be prohibited from making changes to information in their own file or files of their immediate family members. If a user is suspected of violating this agreement, the HMIS Lead will run the audit trail report to determine if there was an infraction.

6. Passwords

- a. Creation: Passwords are automatically generated from the system when the user is created. The HMIS Lead will communicate the system-generated password to the user.
- b. Use: The user will be required to change the password the first time they log onto the system. The password must be at least eight characters and

alphanumeric. Passwords should not be able to be easily guessed or found in a dictionary. Passwords are the individual's responsibility and users cannot share passwords. Users may not keep written copies of their password in a publicly accessible location.

- c. Storage: Any passwords that are written down are to be stored securely and must be inaccessible to other persons. Users are not to store passwords on a personal computer for easier log on.
- d. Expiration: Passwords expire every 45 days. Users may not use the same password consecutively. Passwords cannot be re-used until two password selections have expired.
- e. Unsuccessful logon: If a user unsuccessfully attempts to log-on three times, the User ID will be "locked out", and access permission will be revoked rendering the user unable to gain access until his/her password is reset.

7. Inputting Data

Agencies participating in the HMIS must meet the minimum data entry requirements established under the most recent HMIS Data Standards.

8. Tracking of Unauthorized Access

Any suspicion of unauthorized activity should be reported to the HMIS Lead.

9. Designated Agency HMIS Contact

- a. This person is responsible for ensuring new agency staff persons are trained on how to use the HMIS by the HMIS Lead and for ensuring that new staff are aware of any agency or program specific data entry requirements.
- b. The Designated Agency HMIS Contact must identify the data element requirements for each project and work with the HMIS Lead to properly set up each project in the HMIS.

10. Designated Agency Security Officer

- a. Each Agency must designate a Security Officer. The Security Officer must be a current HMIS User and may also be the Designated Agency HMIS Contact.
- b. The Security Officer is responsible for ensuring compliance with applicable security standards and maintaining the security of HMIS for their agency.

11. Client Informed Consent and Release of Information

In addition to posting the HMIS Consumer Notice, agencies must obtain client consent prior to sharing client data with other agencies when data sharing is appropriate for client service delivery. Agencies are required to ensure clients know what data is being collected about them and be given the opportunity to make choices about what personal and program related information is shared in HMIS and with whom the data is shared. Agencies will use the Client Informed Consent and ROI form on the HMIS Lead website. The form requires clients to authorize the electronic sharing of their personal information and allows for clients to have more control over their own information. Agencies are required to obtain client consent. Clients have the right to refuse any level of shared data. Users are required to complete the ROI data in the client's record in HMIS to indicate the date the release was signed, whether the client consented to the release, and the date the release expires. Additionally, users are required to upload the completed ROI to the client's record in HMIS.

12. Data Protocols

Agencies may collect information for data elements in addition to minimally required data elements established by the CoC in accordance with HUD. Agencies must maintain consistency with data collection and entry within each program.

13. Agency Relationship with the HMIS Vendor

Agencies are prohibited from directly contacting the HMIS vendor to request custom database work. Any such request must be made through the HMIS Lead.

C. User Training Requirements

1. New User Training Requirements

- a. All users are required to attend new user training with the HMIS Lead prior to receiving access to the system. If the HMIS Lead determines the data entered by a current end user does not meet minimum data quality standards, users may be required to repeat this training.
- b. Once a new user begins the HMIS New User Training Course, the user has 15 days to complete the training course and all required assignments. The HMIS Lead will review the user's test case and determine if corrections are needed. The user will have an additional 15 days to make all corrections. If the user fails to complete all requirements within 30 days, the user will need to retake the new user training course. The HMIS Lead may determine that a new user failed to grasp the necessary data entry concepts based on the quality of the user's test case. The HMIS Lead may use their discretion to require new users to repeat user training. If a new user fails to successfully complete the test case requirements for data entry after repeated attempts, the HMIS Lead may use the discretion to determine that the new user is not capable of accurate and complete data entry and may refuse to issue the new user a North Dakota HMIS user license, in consultation with the CoC.
- c. Included in and in addition to the New User Training Course, users will be required to take program and/or project specific training related to the programs and projects administered by their agency.
- d. Regarding Coordinated Entry, it is the responsibility of the Agency to inform the user of the training curriculum and requirements for an agency and/or user's participation in Coordinated Entry in HMIS. Where provided by the CoC, the HMIS Lead will host a link to those requirements. The HMIS Lead will provide the HMIS specific workflow and report trainings.
- e. If a user is requesting a new user license and the user had a license for the North Dakota HMIS in the past, the user will be required to re-take the training course, with few exceptions. The HMIS Lead has sole discretion to waive the requirements to attend new user training. The HMIS Lead will consider the user's familiarity with HMIS and the need for the user to learn about potential system updates and changes during new user training when making the decision to waive the new user training requirement.
- f. Users are expected to fully participate in all trainings attended. If a user misses more than ten minutes or ten percent (whichever is greater) of a training, the user will not receive credit for completing the training.

2. Ongoing User Training Requirements

- a. All users are required to attend annual privacy and security training to retain their user license.

- b. All users are required to attend at least two different general HMIS trainings annually. The new user training course will count as one training toward the general training requirement. New users taking the New User Training Course in December will be exempt from completing an additional training during that calendar year.
- c. Users are expected to fully participate in all training attended. If a user misses more than ten minutes or ten percent (whichever is greater) of a training, the user will not receive credit for completing the training.
- d. The HMIS Lead will suspend user licenses from users who do not complete their annual training requirements by December 31 of the following year. To activate the license, the user must complete their training requirements.

D. HMIS User Levels

HMIS User Roles are listed on the HMIS Lead website. HMIS User Roles:

1. Resource Specialist I

Users at this level may access only the ResourcePoint module. Users may search the database of area agencies and programs and view the agency or program detail screens. A Resource Specialist I cannot modify or delete data and does not have access to client or service records or other modules and screens.

2. Resource Specialist II

Users may access only the ResourcePoint module. Users may search the database of area agencies and programs and view the agency or program detail screens. At this level, the user does not have access to client or service records or other modules and screens. A Resource Specialist II is an agency-level "Information & Referral (I&R) specialist" who may update their own agency and program information.

3. Resource Specialist III

Users at this level may access only the ResourcePoint module. Users may search the database of area agencies and programs and view the agency or program detail screens. A Resource Specialist III may add or remove resource groups, including Global (which they get by default). Access to client or service records and other modules and screens is not given. A Resource Specialist III may edit the system-wide news feature.

4. Volunteer

Users may access ResourcePoint and have limited access to ClientPoint and service records. A volunteer may view or edit basic demographic information about clients (the profile screen) but is restricted from all other screens in ClientPoint. A volunteer may also enter new clients, make referrals, and check clients in/out from a shelter. A volunteer does not have access to the "Services Provided" tab. This access level is designed to allow a volunteer to perform basic intake steps with a new client and then refer the client to an Agency staff member or case manager.

5. Agency Staff

Users may access ResourcePoint, have full access to service records, and limited access to ClientPoint. Agency staff may access most functions in ServicePoint, however, they may only access basic demographic data on clients (profile screen). All other screens are restricted including Reports. Agency staff can add news items to the newswire feature.

6. Case Manager I

Users may access all screens and modules except "Administration." A Case Manager I may access all screens within ClientPoint, except the medical screen for confidentiality reasons. Users may access reports.

7. Case Manager II

Users may access all screens and modules except "Administration." A Case Manager II may access all screens within ClientPoint, including the medical screen. Users may access reports.

8. Case Manager III

This role has the same actions available as the Case Manager II with the added ability to see project data for all providers on their provider tree, like an Agency Administrator.

9. Agency Administrator

Users may access all ServicePoint screens and modules. Agency Administrators can reset the passwords of users at their agency. Agency Administrators can add/remove users and edit agency and program data for all providers on their provider tree.

10. Executive Director

Users have the same access rights as an Agency Administrator but rank above the Agency Administrator.

11. System Operator

Users may only access Administration screens. System operators can create new agency providers, add new users, reset passwords, and access other system-level options. Users may order additional user licenses and modify the allocation of licenses. They maintain the system but may not access any client or service records.

12. System Administrator I

Users have the same access rights to client information as Agency Administrators, but for all agencies in the system. System Administrators also have full access to administrative functions.

13. System Administrator II

There are no system restrictions for System Administrator II users. They have full HMIS access. This level of access is limited to the HMIS Lead for the purposes of administering and managing HMIS.

E. HMIS Vendor Requirements

1. Physical Security

Access to the areas containing HMIS equipment, data, and software will be secured. HMIS vendor staff will only access these areas to perform functions necessary to complete their job.

2. Firewall Protection

The HMIS vendor will secure the perimeter of its network using technology from firewall vendors. HMIS vendor staff monitor firewall logs to determine unusual patterns and possible system vulnerabilities.

3. User Authentication

HMIS vendor staff may only access HMIS with a valid username and password combination that is encrypted via SSL for internet transmission to prevent theft. For added security, the session key is automatically scrambled and re-established in the background at regular intervals.

4. Application Security

HMIS vendor staff will be assigned a system access level that restricts their access to appropriate data.

5. Database Security

Wherever possible, all database access is controlled at the operating system, and database connection level for additional security. Access to production database is limited to a minimal number of points. As with production servers, production databases do not share a master password database.

6. Technical Support

The HMIS vendor will assist the HMIS Lead to resolve software problems, make necessary modifications for special programming, and will explain system functionality to the HMIS Lead.

7. Technical Performance

The HMIS vendor maintains the system, including backup, data retrieval, and server functionality/operation. Upgrades to the system software will be continuously developed and implemented.

8. Hardware Disposal

Data stored on broken equipment or equipment intended for disposal will be destroyed using industry standard procedures.

F. Minimum Technical Standards

1. Minimum Computer Requirements

- a. A PC with a 2 Gigahertz or higher processor, 40GB hard drive, 512 MB RAM and Microsoft Windows 7, 8, or 10.
- b. The most recent version of Firefox, Google Chrome, or Safari. No additional plug-in is required.
- c. It is recommended that the internet browser have a 128 cipher/encryption strength installed. The browser's cache should be set to "Check for new version of the stored pages: Every visit to page."
- d. A broadband Internet connection or LAN connection. Dial-up modem connections are not sufficient.
- e. Virus protection updates.
- f. Mobile devices used for HMIS data entry must use the Mozilla Firefox, Google Chrome, or Apple Safari Internet browsers. Apple Safari must be used on the latest version of iOS.

2. Additional Recommendations

- a. Memory: Windows 7, 8, or 10: 4 Gig recommended (2 Gig minimum)
- b. Monitor: Screen Display: 1024x768 (VGA) or higher; 1280x768 strongly advised
- c. Processor: A Dual-Core processor is recommended.

G. HMIS License Fees

Each July, the HMIS Lead will invoice agencies for their HMIS licenses. Agencies will be invoiced based on the number of licenses allocated to them in the system at a cost of \$290 per license

H. HMIS Operating Policies Violation

1. HMIS users and Agencies must abide by all HMIS operational policies and procedures found in the HMIS Policies and Procedures manual, the North Dakota HMIS User Policy Code of Ethics and Responsibility Statement, and the North Dakota Agency Agreement. Repercussion for any violation will be assessed in a tiered manner. Each user or Agency violation will face successive consequences – the violations do not need to be of the same type in order to be considered second or third violations. User violations do not expire. No regard is given to the duration of time that occurs between successive violations of the HMIS policies and procedures as it relates to corrective action.
 - a. First Violation – the user and the Agency will be notified of the violation in writing by the HMIS Lead. The user's license will be suspended for 30 days or until the Agency notifies the HMIS Lead of the action taken to remedy the violation. The HMIS Lead will provide necessary training to the user and/or Agency to ensure the violation does not continue. The HMIS Lead will notify the CoC Board of the violation during the next scheduled Board meeting following the violation.
 - b. Second Violation – the user and the Agency will be notified of the violation in writing by the HMIS Lead. The user's license will be suspended for 30 days. The user and/or Agency must take action to remedy the violation; however, this action will not shorten the length of the license suspension, the suspension will continue until the Agency notifies the HMIS Lead of the action taken to remedy the violation. The HMIS Lead will provide necessary training to the user and/or Agency to ensure the violation does not continue. The HMIS Lead will notify the CoC Board of the violation during the next scheduled Board meeting following the violation.
 - c. Third Violation – the user and Agency will be notified of the violation in writing by the HMIS Lead. The HMIS Lead will notify the CoC Board of the violation and convene a review panel made up of the Board members who will determine if the user's license will be suspended for a minimum of 30 days or until the Board review panel notifies the HMIS Lead of their determination, whichever occurs later. If the Board determines the user should retain their user license, the HMIS Lead will provide necessary training to the user and/or Agency to ensure the violation does not continue. If the user retains their license after their third violation and has an additional violation, that violation will be reviewed by the Board review panel.
2. Any user or other fees paid by the Agency will be not returned if the user's Agency's access to HMIS is revoked.
3. Notifying the HMIS Lead of a Violation

It is the responsibility of each Designated Agency HMIS Contact and general user to notify the HMIS Lead when they suspect that a user or Agency has violated any HMIS operational agreement, policy, or procedure. A complaint about the potential violation must include the user and Agency name and the description of the violation, including the date or timeframe of the suspected violation. Complaints should be sent in writing to the HMIS Lead via the HMIS

Lead's Help Desk email. The name of the person making the complaint will not be released from the HMIS Lead if the individual wishes to remain anonymous.

4. Violations of Local, State, or Federal Law

Any Agency or user violation of local, state, or federal law will immediately be subject to the consequences listed under the Third Violation above.

5. Multiple Violations within a 12-Month Timeframe

During a 12-month calendar year, if there are multiple users (three or more) with multiple violations (two or more) from one Agency, the Agency as a whole will be subject to the consequences listed under the Third Violation above.

III. Privacy and Security

The importance of the integrity and security of HMIS cannot be overstated. Given this importance, HMIS must be administered and operated under high standards of data privacy and security. The HMIS Lead and Agencies are jointly responsible for ensuring that HMIS data processing capabilities, including the collection, maintenance, use, disclosure, transmission, and destruction of data, comply with HMIS privacy, security, and confidentiality policies and procedures. When a privacy or security standard conflicts with other federal, state, and local laws to which the Agency must adhere, the Agency must contact ICA to collaboratively update the applicable policies for the Agency to accurately reflect the additional protections.

A. Data Assessment and Access

All HMIS data will be handled according to the following major classifications: Shared or Not Shared Data. HMIS staff will assess all data and implement appropriate controls to ensure that data classified as shared or not shared are handled according to the following procedures.

1. Shared Data

Shared data is unrestricted information that has been entered by one provider and is visible to other providers using HMIS. North Dakota's HMIS is designed as a shared system that defaults to allow shared data.

2. Data that is Not Shared

Information entered by one provider that is not visible to other providers using HMIS. Programs that serve individuals with HIV/AIDS, provide services to unaccompanied minors (unless signed by a legal guardian), or legal services must enter not shared data. Individual client records can be not shared at the client's request.

3. Procedures for transmission and storage of data

- a. Open Data: This is data that does not contain personal identifying information. The data should be handled discretely, unless it is further classified as Public Data. The data must be stored out of site and may be transmitted via internal or first-class mail until it is considered public data.
- b. Confidential Data at the Agency Level: Confidential data contains personal identifying information. Each Agency shall develop rules governing the access of the confidential data in HMIS to ensure that those staff needing confidential data access will have access, and access is otherwise restricted. The Agency rules shall also cover the destruction of paper and electronic data in a manner that will ensure that privacy is maintained and that proper controls are in place for any hard copy and electronic data that is based on HMIS data.
- c. Whenever confidential data is accessed:
 - Hard copies shall be shredded when disposal is appropriate. Hard copies shall be stored in a secure environment that is inaccessible to the general public or staff not requiring access.
 - Hard copies shall not be left out in the open or unattended.
 - Electronic copies shall be stored only where the employee can access the data.
 - Electronic copies shall be stored where a password is required to access the data if on shared server space.
- d. All public data must be classified as aggregated public and unpublished restricted access data.
 - Aggregated Public Data: Information published according to the "Reporting Parameters and Guidelines" (HMIS Policies and Procedures Section III.B).
 - Unpublished Restricted Access Data: Information scheduled, but not yet approved, for publication. Examples include draft reports, fragments of data sets, and data without context or data that has not been analyzed.

4. Procedures for Transmission and Storage of Data

a. Aggregated Public Data: Security controls are not required.

b. Unpublished Restricted Access Data:

- Draft or Fragmented Data – Accessible only to authorized HMIS staff and Agency personnel. Requires auditing of access and must be stored in a secure out-of-sight location. Data can be transmitted via e-mail, internal departmental mail, or first-class mail. If mailed, data must be labeled confidential.
- Confidential Data: Requires encryption at all times. Must be magnetically overwritten and destroyed. Hard copies of data must be stored in an out-of-sight secure location.

B. Data Reporting Parameters and Guidelines

All open data will be handled according to the following classifications – *Public Data, Internal Data, and Restricted Data* – and should be handled according to the following procedures.

Principles for Release of Data

Only de-identified aggregated data will be released except as specified below.

1. No identified client data may be released without the informed consent of the client, unless otherwise specified by North Dakota state and federal confidentiality laws. All requests for such information must be addressed to the owner/Agency where the data was collected.
2. Program specific information used for annual grant program reports and program specific information included in grant applications is classified as public information. No other program specific information will be released without written consent of that program.
3. There will be full access to aggregate data included in published reports.
4. Reports of aggregate data may be made directly available to the public.
5. The parameters of the aggregated data, that is, where the data comes from and what it includes will be presented with each report.
6. Data will be provided to agencies requesting reports on a case-by-case basis.
7. Requests must be written with a description of specific data to be included and for what duration of time. Requests are to be submitted at least 30 days prior to the date the report is needed. Exceptions to the 30-day notice may be made.
8. ICA reserves the right to deny any request for aggregated data, in consultation with the CoC. Final decisions will be made by the HMIS Director and CoC Coordinator.

C. Release of Data for Grant Funders

Entities providing funding to agencies or programs required to use HMIS will not have automatic access to HMIS. Access to HMIS will only be granted by the HMIS Lead when there is a voluntary written agreement in place between the funding entity and the agency or program. Funding for any agency or program using HMIS cannot be contingent upon establishing a voluntary written agreement allowing the funder HMIS access.

D. Baseline Privacy Policy

1. Collection of Personal Information

- a. Personal information will be collected for HMIS only when it is needed to provide services, when it is needed for another specific purpose of the agency where a client is receiving services, or when it is required by law. Personal information may be collected for these purposes:
 - To provide or coordinate services for clients.
 - To find programs that may provide additional client assistance.
 - To comply with government and grant reporting obligations.
 - To assess the state of homelessness in the community and to assess the condition and availability of affordable housing to better target services and resources.
- b. Only lawful and fair means are used to collect personal information.
- c. Personal information is collected with the knowledge and consent of clients. It is assumed that clients consent to the collection of their personal information as described in this notice when they seek assistance from an agency using HMIS and provide the agency with their personal information.
- d. If an agency reasonably believes that a client is a victim of abuse, neglect, or domestic violence, or if a client reports that he/she is a victim of abuse, neglect, or domestic violence, explicit permission is required to enter and share the client's information in HMIS.
- e. Personal information may also be collected from:
 - Additional individuals seeking services with a client.
 - Other agencies that provide services and participate in HMIS.
- f. Upon request, clients must be able to access the *Use and Disclosure of Personal Information* policy found below.

2. Use and Disclosure of Personal Information

These policies explain why an agency collects personal information from clients. Personal information may be used or disclosed for activities described in this part of the notice. Client consent to the use or disclosure of personal information for the purposes described in this notice, and for reasons that are compatible with purposes described in this notice, but not listed, is assumed. Clients must give consent before their personal information is used or disclosed for any reason not described here.

Personal information may be used or disclosed for the following purposes:

- a. To carry out administrative functions such as legal audits, personnel oversight, and management functions.
- b. For research and statistical purposes. Personal information released for research and statistical purposes will be anonymous.
- c. For academic research conducted by an individual or institution that has a formal relationship with the HMIS Lead and is approved by the CoC. The research must be conducted by an individual employed by or affiliated with the organization or institution. All research projects must be conducted under the written research agreement approved in writing by the Designated Agency HMIS Contact or Executive Director. The written research agreement must:

- Establish rules and limitations for processing personal information and providing security for personal information in the course of the research.
 - Provide for the return or proper disposal of all personal information at the conclusion of the research.
 - Restrict additional use or disclosure of personal information, except where required by law.
 - Require that the recipient of the personal information formally agrees to comply with all the terms and conditions of the written research agreement.
 - Be substituted, when appropriate, by Institutional Review Board, Privacy Board, or other applicable human subjects' protection institution approval.
- d. When required by law, personal information will be released to the extent that use or disclosure complies with the requirements of the law.
- e. To avert a serious threat to health or safety if:
- The use or disclosure is necessary to prevent or lessen a serious or imminent threat to the health or safety of an individual or the public; and
 - The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.
- f. To report to a governmental authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect, or domestic violence, information about an individual reasonably believed to be a victim of abuse, neglect, or domestic violence. When the personal information of a victim of abuse, neglect, or domestic violence is disclosed, the individual whose information has been released will promptly be informed, except if:
- It is believed that informing the individual would place the individual at risk of serious harm, or
 - A personal representative (such as a family member or friend) who is responsible for the abuse, neglect, or other injury of the individual who would be informed, and it is believed that informing the personal representative would not be in the best interest of the individual as determined in the exercise of professional judgement.
- g. For a law enforcement purpose (if consistent with applicable law and standards of ethical judgement) under any of these circumstances:
- In response to lawful court order, court-ordered warrant, subpoena, or summons issued by a judicial officer or a grand jury subpoena. It is the responsibility of the HMIS Lead or Agency to provide the information requested.
 - If the law enforcement official makes a written request for personal information including that which constitutes evidence of criminal conduct that occurred at the agency where the client receives services. The written request must meet the following requirements:
 - Be signed by a supervisory official of the law enforcement agency seeking the personal information;
 - State how the information is relevant and material to a legitimate law enforcement investigation;

- Identify the person for information sought;
 - Be specific and limited in scope to the purpose for which the information is sought, and
 - It is the responsibility of the HMIS Lead or Agency to provide the information requested.
 - If the official is an authorized federal official seeking personal information for the provision of protective services to the President or other persons authorized by 18 U.S.C 3056 or to a foreign head of state or other persons authorized by 18 U.S.C. 871 (threats against the President and others), and the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought.
- h. For law enforcement or another public official authorized to receive a client's personal information to conduct an immediate enforcement activity that depends upon the disclosure. Personal information may be disclosed when a client is incapacitated and unable to agree to the disclosure if waiting until the individual is able to agree to the disclosure would materially and adversely affect the enforcement activity. In this case, the disclosure will only be made if it is not intended to be used against the individual.
- i. To comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.
3. Inspection and Correction of Personal Information
- a. Clients may inspect and receive a copy of their personal information maintained in HMIS. The agency where the client received services will offer to explain any information that a client may not understand.
- b. If the information listed in HMIS is believed to be inaccurate or incomplete, a client may submit a verbal or written request to have his/her information corrected. Inaccurate or incomplete data may be deleted or marked inaccurate or incomplete and supplemented with additional information.
- c. A request to inspect or copy one's personal information may be denied if:
- The information was compiled in reasonable anticipation of litigation or comparable proceedings;
 - The information was obtained under a promise or confidentiality and if the disclosure would reveal the source of the information; or
 - The life or physical safety of any individual would be reasonably endangered by disclosure of the personal information.
- d. If a request for inspection access or personal information correction is denied, the agency where the client receives services will explain the reason for the denial. The client's request and the reason for the denial will be included in the client's record.
- e. Requests for inspection and access or personal information correction may be denied if they are made in a repeated and/or harassing manner.
4. Limits on Collection of Personal Information
- a. Only personal information relevant for the purpose(s) for which it will be used will be collected. Personal information must be accurate and complete.

- b. Client files not used in seven years may be made inactive in HMIS. The HMIS Lead will check with agencies before making client files inactive. Personal information may be retained for a longer period if required by statute, regulation, contract, or another obligation.

5. Limits on Partner Agency Use of HMIS Client Information

- a. The North Dakota HMIS is a shared data system. The system allows Agencies to share client information in order to coordinate services for clients. However, Agencies may not limit client services or refuse to provide service in a way that discriminates against clients based on information the Agency obtained from HMIS. Agencies may not penalize a client based on historical data contained in HMIS.
- b. Youth providers serving unaccompanied minors under the age of 18 must maintain HMIS files that are not shared. Unaccompanied youth under the age of 18 may not provide either written or verbal consent to the release of their personally identifying information in HMIS. If the agency receives consent from the unaccompanied youth's legal guardian, data about the youth can be shared in HMIS; otherwise, it will be entered in HMIS unshared.

6. Complaints about Accountability

- a. Questions or complaints about the privacy and security policies and practices may be submitted to the agency where the client received services. Complaints specific to HMIS should be submitted to the Designated Agency HMIS Contact and program director. If no resolution can be found, the complaint will be forwarded to the HMIS Lead and the HMIS Lead's executive director. If there is no resolution, the CoC Board will oversee the final arbitration. All other complaints will follow the agency's grievance procedure as outlined in the Agency's handbook.
- b. All HMIS users (including employees, volunteers, affiliates, contractors, and associates) are required to comply with this privacy notice. Users must receive and acknowledge receipt of this privacy notice.

E. Use of a Comparable Database by Victim Service Providers

Victim service providers, private non-profit agencies whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking, must not directly enter into or provide data for HMIS, as they are legally prohibited from participating in HMIS. Victim service providers that are recipients of funds requiring participation in HMIS, but are prohibited from entering data in HMIS, must use a comparable database to enter client information. A comparable database is a database that can use collected client-level data over time and generate unduplicated aggregated reports based on the client information entered in the database. The reports generated by a comparable database must be accurate and provide the same information as the reports generated by HMIS.

F. User Conflict of Interest

Users who are also clients with files in HMIS are prohibited from entering or editing information in their own file. All users are also prohibited from entering or editing information in the files of immediate family members. All users must sign the North Dakota HMIS User Policy Code of Ethics and Responsibility Statement, which includes a statement describing this limitation and report any potential conflict of interest to their Designated Agency HMIS Contact. The HMIS Lead may run the audit trail report to determine if there has been a violation of the conflict of interest agreement.

G. Privacy and Security Training for Users

All users must receive privacy and security training prior to being given access to HMIS. Privacy and security training is covered during the new user training for all new users. All users must receive on-going annual training on privacy and security from the HMIS Lead.

H. Violation of Security Procedures

1. All potential violations of any security protocols will be investigated, and any user found to be in violation of security protocols will be sanctioned accordingly. Sanctions may include but are not limited to: a formal letter of reprimand, suspension of system privileges, revocation of system privileges, and criminal prosecution.
2. If possible, all confirmed security violations will be communicated in writing to the affected client within 14 days, unless the client cannot be located. If the client cannot be located, a written description of the violation and efforts to locate the client will be prepared by the HMIS Lead and placed in the client's file at the Agency that originated the client's record.
3. Any agency that is found to have consistently and/or flagrantly violated security procedures may have their access privileges suspended or revoked. All sanctions are imposed by the HMIS Lead. All sanctions may be appealed to the CoC Board.

I. Procedure for Reporting Security Incidents

Users and Designated Agency HMIS Contacts should report all unlawful access of HMIS and unlawful attempted access of HMIS. This includes theft of usernames and passwords. Security incidents should be reported to the HMIS Lead. The HMIS Lead will use the HMIS user audit trail report to determine the extent of the breach of security.

J. Disaster Recovery Plan

WellSky Community Services Disaster Recovery Plan

North Dakota's HMIS is covered under WellSky Community Services Disaster Recovery Plan. Due to the nature of technology, unforeseen service outages may occur. In order to assure service reliability, WellSky provides the following disaster recovery plan. Plan highlights include:

1. Database tape backups occur nightly.
2. Tape backups are stored offsite.
3. Seven day backup history is stored locally on instantly accessible Raid 10 storage.
4. One-month backup history is stored offsite.
5. Access to WellSky's emergency line to provide assistance related to "outages" or "downtime" 24 hours a day.
6. Data is backed up locally on instantly accessible disk storage every 24 hours.
7. The application server is backed up offsite, out-of-state, on a different internet provider and on a separate electrical grid via a secured Virtual Private Network (VPN) connection.
8. Backups of the application site are near-instantaneous (no files older than five minutes).

9. The database is replicated nightly at an offsite location in case of a primary data center failure.
10. Priority level response (ensures downtime will not exceed four hours).

IV. Data Requirements

A. Minimum Data Collection Standard

1. Agencies are responsible for asking all clients a minimum set of questions for use in aggregate analysis. These questions are included in custom assessments that are created by the HMIS Lead. The required data elements depend on the program.
2. The Designated Agency HMIS Contact must identify the assessments and data element requirements for each project. The HMIS Lead will consult with the Designated Agency HMIS Contact to properly set up each project in HMIS.
3. Guidelines clearly articulating the minimum expectations for data entry for all projects entering data in HMIS will be sent to the Designated Agency HMIS Contacts and posted on the HMIS Lead's website. Designated Agency HMIS Contacts must ensure that the minimum data elements are fulfilled for every project.

B. Provider Naming Convention

All providers within HMIS must be named so they accurately reflect the type of service carried out by the corresponding Agency project.

C. Data Quality Plan

Data quality is a term that refers to the reliability and validity of client-level data collected in the HMIS. It is measured by the extent to which the client data in the system reflects actual information in the real world. No data collection system has a quality rating of 100%. However, to meet the goals set forth by the CoC when presenting accurate and consistent information on homelessness, it is critical that the HMIS have the best possible representation of reality as it relates to the persons at-risk of and experiencing homelessness and the projects that serve them. Specifically, the goal is to record the most complete, accurate, consistent, and timely information in order to draw reasonable conclusions about the extent of homelessness and the impact on the homeless services system. To that end, the CoC will collectively assess the quality of our data by examining characteristics such as timeliness, completeness, and accuracy.

See Appendix 2 for the complete Data Quality Plan.

D. Data Imports

While HMIS databases are required to have the capacity to accept data imports, the CoC reserves the right not to allow data imports into HMIS. Allowing data imports will impact data integrity and increase the likelihood of duplication of client files in the system.

E. HMIS Data Protections

It is the responsibility of the HMIS Lead to maintain the HMIS, including protecting the data contained in HMIS. In the case where the HMIS Lead is made aware through data contained in HMIS that Agency program funds were used for an ineligible service, the HMIS Lead will notify the Agency about the misuse of funds. If the Agency fails to rectify the misuse of funds in a timely fashion, the HMIS Lead will notify the appropriate funding body.

V. Glossary

- A. **Aggregated Public Data** – data that is published and available publicly. This type of data does not identify clients in the HMIS.
- B. **Not Shared Data** – information entered by one provider that is not visible to other providers using HMIS.
- C. **Confidential Data** – contains personal identifying information.
- D. **Designated Agency HMIS Contact** - the individual responsible for HMIS use at each Agency. This includes running reports and verifying data entry is accurate and timely.
- E. **HMIS – Homeless Management Information System** – an internet-based database that is used by homeless service organizations across North Dakota to record and store client-level information about the numbers, characteristics, and needs of homeless persons and those at risk of homelessness.
- F. **HMIS Lead Agency** – the entity designated by the CoC in accordance with the CoC Interim Rule to operate the CoC's HMIS on its behalf.
- G. **North Dakota Continuum of Care Board** – the group of CoC members who are responsible for approving and implementing the HMIS Policies and Procedures, and for working to make improvements to North Dakota's HMIS.
- H. **HMIS License Fee** – the annual fee paid by Agencies to allow each HMIS user at their agency continued access to the database.

- I. **HMIS User Level** – HMIS users are assigned a specific user level that limits the data the user can access in the database.
- J. **HMIS Vendor** –North Dakota’s HMIS software vendor is WellSky Community Services. The HMIS vendor designs the HMIS and provides ongoing support to the HMIS Lead Agency.
- K. **Universal Data Elements** – a minimum set of questions that must be completed for each client to provide data for use in aggregate analysis.
- L. **Open Data** – does not contain personal identifying information.
- M. **Partner Agencies** – the homeless service agencies that use HMIS.
- N. **Program Specific Data Elements** – to meet the statutory and regulatory requirements of federally funded programs using HMIS, elements are required for different funding sources. The Program Specific Data Elements are elements required by at least one of the HMIS Federal Partner programs.
- O. **System Administrators** – staff at the HMIS Lead who are responsible for overseeing HMIS users and use in North Dakota. The System Administrators allow users HMIS access and provide training, ensure user compliance with HMIS policies and procedures, and make policy recommendations to the CoC Board.
- P. **Shared Data** – unrestricted information that has been entered by one provider and is visible to other providers using HMIS.
- Q. **Unpublished Restricted Access Data** – information scheduled, but not yet approved, for publication.
- R. **Victim Service Provider** – a nonprofit agency with a primary mission to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.

VI. HMIS Policies and Procedures

HMIS Policies and Procedures include:

- A. Data Dictionary and Data Manual (Appendix 1)
- B. Data Quality Plan (Appendix 2)

VII. Acknowledgement of Receipt of North Dakota HMIS Policy and Procedures, Privacy Notice, and Data Quality Plan

The North Dakota HMIS Policy and Procedures, Privacy Notice, and Data Quality Plan contains important information regarding the expectations of Agencies that use the North Dakota Homeless Information Management System.

I acknowledge that I have received a copy of the North Dakota HMIS Policies and Procedures, Privacy Notice, and Data Quality Plan. I understand that it is my responsibility to read and comply with these policies and procedures, as well as any revisions made to them. I also understand that if I need additional information, or if there is anything that I do not understand in these policies and procedures, I should contact my Designated HMIS Agency Contact for clarification.

I understand that these policies and procedures reflect policies, practices, and procedures in effect on the date of publication and that it supersedes any prior policies and procedures. I further understand that rules, policies, and expectations referred to in these policies and procedures are evaluated and may be modified at any time, with or without notice. I acknowledge that these policies and procedures will be updated annually and it is my responsibility to be aware of and adhere to the changes of the policies and procedures as they occur.

Signature

Date

Print Name

Agency

Appendix 1: Data Dictionary and Data Manual

The [HMIS Data Standards Manual](#) is intended to serve as a reference and provide basic guidance on HMIS data elements for the CoC, HMIS Lead Agencies, HMIS System Administrators, and users. The companion document to the HMIS Data Manual is the [HMIS Data Dictionary](#).

The HMIS Data Dictionary is designed for HMIS vendors, HMIS Lead Agencies, and HMIS System Administrators to understand all the data elements required in an HMIS, data collection and function for each required element, and the specific use of each element by the appropriate federal partner. The HMIS Data Dictionary should be the source for HMIS software programming.

HMIS databases must be able to collect all the data elements defined in the HMIS Data Dictionary, support system logic identified in this document, and ensure that data collection and the visibility of data elements is appropriate to the project type and federal funding source for any given project.

The current HMIS Data Dictionary and Data Manual can be found at:
<https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>

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Appendix 2: Data Quality Plan

Data quality is vitally important to the success of the HMIS and the programs that use this database. The federal partners and other funders monitor the quality of the HMIS data through the Longitudinal System Analysis (LSA), System Performance Measures (SPMs), the CoC Program Competition, and a variety of other program reports. If the quality of the data is poor, funders may refuse grant funding or reduce future funding. The funding cuts could negatively affect program(s) throughout the State of North Dakota. As it is imperative that the data is correct, HMIS participating providers and the HMIS Lead will work diligently on adhering to the HMIS Data Standards in order to ensure all reports are complete, consistent, accurate, and timely.

I. Goals of the Data Quality Plan

A. The goals of this plan are to:

1. Help ensure the availability of timely and accurate data for use in helping to end homelessness.
2. Identify problems early and increase the usability of data.
3. Prepare data for federal, state, and local reporting processes.
4. Support the efforts of the CoC, including Coordinated Entry.

B. Agencies and program providers will also benefit from participating in this process by:

1. Requiring less corrections right before reports are due, because data will be cleaned up regularly.
2. Providing access to more up-to-date information to inform program decision, monitor client progress, and inform stakeholders about programs.
3. Implementing changes when needed and measuring progress against goals.

II. Data Quality Plan and Responsibilities

A. North Dakota Continuum of Care Board

1. Maintain an ongoing relationship with the HMIS users from across the state to identify training needs.
2. Develop the HMIS Policies and Procedures, including a Data Quality and Security Plan, which are updated annually.
3. Meet at least annually to discuss changes to HMIS Policies and Procedures and updates in the system related to HMIS Data Quality.

B. Funder Role

1. Create a framework of performance expectations that will enable the funder to rank and rate projects and target funding based on need.
2. Monitor the established baseline standards for participation and data collection as set forth by the HMIS Data Standards.
3. Work with the HMIS Lead to perform site visits yearly that will include comparing paper files to the data entered in HMIS to check for data accuracy and completeness.

C. HMIS Lead Role

1. Review the data quality reports for the CoC.
2. If a provider has data quality issues, forward the report to the provider, so they can fix their data.
3. Review the provider list for each report. If there is missing or incorrect providers on the list, confirm those with the Agency.
4. Run specified data quality reports monthly*.
5. Run specified data quality reports quarterly*.
6. Assist funders with monitoring when appropriate and provide technical assistance regularly to non-funded HMIS participating HMIS agencies.
7. Provide HMIS training to new users prior to giving access to the system.
8. Provide on-going HMIS training for existing users.

D. HMIS Participating Agency

1. Maintain a high level of HMIS data quality, using the baseline requirements as laid out in the Data Quality Plan.
2. Seek assistance from the HMIS Lead and/or CoC when there are questions about HMIS data quality.
3. Be responsive to questions and requests from both the HMIS Lead and CoC related to data quality.
4. Inform the HMIS Lead when an existing HMIS user no longer needs access to the system, within 24 hours of no longer needing access.
5. Inform the HMIS Lead when a new HMIS user needs to receive training on HMIS data entry.
6. Inform the HMIS Lead when an existing HMIS project ends, at least 14 days prior to the project's termination.
7. Inform the HMIS Lead when a new HMIS project needs to be created, at least 14 days prior to the project's beginning.

E. Designated Agency HMIS Contact

1. Review data quality reports sent by the HMIS Lead.
2. If there are data quality issues, work with users within the Agency to correct them as soon as possible.
3. Run data quality reports to check client data on a monthly basis.
4. Compare paper files to data entered in HMIS regularly.
5. Direct any HMIS questions to the HMIS Lead.

F. User Role

1. Input required data fields accurately and in a timely manner.
2. Review data quality reports sent by the Designated Agency HMIS Contact or the HMIS Lead.
3. Correct data quality issues as soon as possible.

III. Data Completeness

- A. All data entered in HMIS must be complete. Completeness is the level at which a field has been answered in whole or in its entirety. Measuring completeness can ensure that client profiles are accurately answered in whole and that an entire picture of the client situation emerges. Partially complete or missing data (e.g., missing the SSN, missing the date of birth, missing information on disabling condition, or missing veteran status) can negatively affect the CoC's ability to provide appropriate referrals and comprehensive care to the client. Incomplete data results in an inaccurate picture of the need in the CoC, directly affecting services in individual communities necessary to permanently house clients. It is every HMIS user's responsibility to report an accurate picture of populations served to facilitate accurate reporting and analysis.
- B. The ultimate goal is to collect 100% of all data elements for all household members. However, the North Dakota CoC Board recognizes that this may not be possible in all cases. Therefore, an acceptable range of null/missing and unknown/don't know/refused responses has been established, depending on the data element and the project type. Missing data elements are data elements that were either not collected by the Agency or not collected because the client either doesn't remember the information or refuses to answer the question. Don't know/refused is from the client's perspective and is not used to denote that the information was not collected.
- C. Agencies will be expected to record the most complete data possible. It is only permissible to enter incomplete client data when a client refuses to provide his or her or dependent's personal information and the project funder does not prohibit it.
- D. Some required procedures to follow are:
 - 1. If a client refuses to provide responses for specific data elements, record the answer as "client refused".
 - 2. If the client's record already exists in HMIS and that record is available to the Agency, the Agency must not create a new alias or duplicate record. Client records under aliases or duplicate records may affect an Agency's overall data completeness and accuracy rates. The Agency is responsible for any duplication of services that results from hiding the client's actual name under an alias.

Note: A client may not wish to provide information for entry in HMIS. Any client has this right and an HMIS Agency cannot deny services to any client refusing inclusion in HMIS. However, in order for providers that receive HUD and other Federal Partner funding to accurately complete reporting for their projects, the client's information and services must be kept on paper.

IV. Data Completeness Standards

- A. Emergency Shelter projects: All Universal Data Elements will be entered with an overall completeness rate of 95% or greater.
- B. Outreach Projects: All Universal and Project Specific Data Elements will be entered with an overall completeness rate of 90% or greater **after client engagement date.**
- C. Permanent Supportive Housing projects: All Universal and Project Specific Data Elements will be entered with an overall completeness rate of 98% or greater.
- D. Transitional Housing projects: All Universal and Project Specific Data Elements will be entered with an overall completeness rate of 98% or greater.
- E. Rapid Re-housing projects: All Universal and Project Specific Data Elements will be entered with an overall completeness rate of 98% or greater.

- F. Homelessness Prevention projects: All Universal and Project Specific Data Elements will be entered with an overall completeness rate of 98% or greater.
- G. Coordinated Entry projects: All Universal and Project Specific Data Elements will be entered with an overall completeness rate of 98% or greater.
- H. Supportive Services Only projects: All Universal and Project Specific Data Elements will be entered with an overall completeness rate of 98% or greater.

V. Data Consistency

- A. The HMIS Lead will evaluate the quality of all HMIS Agency data on the consistency of the data being entered. All Agencies across should work consistently to reduce duplication in HMIS by following workflow processes outlined in training.
- B. HMIS users are trained to search for existing clients in the system, across multiple parameters, before adding a new client into the system. Client data can be searched by Client ID, Name, Social Security Number, and Client Alias. Users are trained to follow this protocol when adding a new client in the system.
- C. Data consistency will ensure that data is understood, collected, and entered consistently across all projects in the HMIS. Consistency directly affects the accuracy of data. If a user collects all the data, but they do not collect it in a consistent manner, then the data may not be accurate. All data in HMIS shall be collected and entered in a common and consistent manner across all projects. To that end, all users will complete an initial training before accessing the live HMIS database.
- D. The HMIS Lead will provide regular training, refresher courses, as well as updated entry workflows and sample intake forms as a guide for quick reference when collecting and entering data to ensure that data is understood, collected, and entered consistently across all programs in the HMIS.
- E. The HMIS Lead will review data entries in the database quarterly for duplicate entries and merge any duplicate client records found at this time. If an Agency is consistently creating duplicate clients, the HMIS Lead will contact the designated Agency Administrator to notify and address the user creating the duplication, so future duplication can be avoided.
- F. All HMIS Agency client data should adhere to HMIS capitalization guidelines. HMIS users are trained on the current method and style to enter client level data. For example, client names are entered with the first initial of the first and last name capitalized (i.e., First Last). No client name should be entered in any of the following ways:
 - 1. ALL CAPS
 - 2. all lower case
 - 3. Nicknames/street names in the Name space (use the Alias box instead)

VI. Data Accuracy

- A. Accurate data ensures that the HMIS is the best possible representation of reality as it relates to persons experiencing homelessness and the programs serving them on a day-to-day basis. Accuracy can be difficult to assess as it depends on the client providing current data and the intake worker’s ability to document and enter the data accurately. Accuracy is best determined by comparing records in HMIS to paper records, or the records of another reliable provider. For example, an SSN in question can be compared to a paper case file or SSN benefit application. In-person interviews, with clients participating in projects who are utilizing the HMIS, are another method for assessing accurate data entry. Evaluation for accurate documentation of case management, service transactions, and referrals in HMIS can be assessed by client interviews. In-person interviews with clients may be coordinated with funders during HUD monitoring or performed individually with non-HUD funded Agencies by HMIS staff, when appropriate.
- B. Information entered in HMIS needs to be valid, meaning it needs to accurately represent information on the participants of the homeless service projects contributing data to the HMIS implementation. Inaccurate data may be intentional or unintentional. False or inaccurate information is less desirable than incomplete information, since with the latter, it is at least possible to acknowledge the gap. Thus, it should be emphasized to clients and staff that it is better to enter nothing (or client doesn’t know or refused) than to enter inaccurate information. To ensure the most up-to-date and complete data, data entry errors should be corrected on a monthly basis.
- C. All data entered in HMIS shall reflect information provided by the client, as documented by the intake worker or otherwise updated by the client and documented for reference. Knowingly recording inaccurate information is strictly prohibited.

VII. Data Accuracy Standard

Data Quality Measurements: Accurate Data	Data Quality Report Name	Applicability of Stand by Project Type	Max Allowed
Missing Entry/Exits	Data Completeness	All Projects	0%
Incorrect Entry Type	Data Completeness	All Projects	0%
Duplicate Entry/Exits	Data Completeness	All Projects	0%
Future Entry/Exits	Data Completeness	All Projects	0%
Missing Exit Dates	Unexited Clients Exceeding Max Length of Stay	All Projects	0%
Unknown Destinations	Data Completeness	All Projects	20% for ES 20% for Outreach 3% All Other Project Types
Children Only Households	Data Completeness	All Projects	0% except for programs that serve unaccompanied minors
Missing Head of Household	Data Completeness	All Projects	0%

Prior Living Situation and additional questions are not congruent		All Projects	0%
Minors are Veterans		All Projects	0%
Date of Birth matches Project Start Date		All Projects	0%
Multiple Heads of Household for a Household	Data Completeness	All Projects	0%

VIII. Data Timeliness

Data shall be recorded in HMIS on a consistent and timely basis. Users shall strive for real-time or as close to real-time data entry. Real-time or close to real-time is defined by either immediate data entry upon seeing a client or data entry into the HMIS within five calendar days.

IX. Bed/Unit Utilization Rates

One of the primary features of HMIS is the ability to record the number of client stays or bed nights at a homeless assistance project. The count of clients in a project on a given night is compared to the number of beds reported in the Housing Inventory Count (HIC) to return the agency's Bed Utilization percentage. The generally acceptable range of bed utilization rate for established projects is 75%-105%.

Project Type	Lowest Acceptable Bed Utilization Rate	Highest Acceptable Bed Utilization Rate
Emergency Shelter	75%	105%
Transitional Housing	80%	105%
Permanent Supportive Housing	85%	105%
Rapid Re-Housing	80%	105%

X. Monitoring Plan

- A. The data produced from HMIS is critical to meet the reporting and compliance requirements for individual Agencies and the HMIS implementation as a whole. As such, all HMIS agencies are expected to meet the data quality benchmarks described in this document.
- B. To achieve this, the HMIS data will be monitored on a monthly basis to quickly identify and resolve issues that affect the timeliness, completeness, consistency, and accuracy of the data. All monitoring will be done in accordance with the data quality monitoring plan, with the full support of the CoC.
- C. To ensure that service providers have continued access to the expectations set forth in the Data Quality Plan, the following protocol will be used:
 1. Data Quality Plan will be published on the HMIS Lead's website.
 2. The HMIS Lead will make available by the **15th of each month** data quality reports for the purposes of facilitating compliance review by Agencies.
 3. Agencies will have **10 days** to correct the data.

4. The CoC Board will review Agency data quality reports for compliance with data quality benchmarks. The Board will work with the HMIS Lead to identify training needs to improve data quality.
- D. The purpose of monitoring is to ensure that the agreed-upon data quality benchmarks are met to the greatest extent possible and that the data quality issues are quickly identified and resolved. To ensure that Agencies have continued success to the expectations set forth in the Data Quality Plan, the following protocol will be used:
1. The CoC will have the ability to review and critique the Data Quality Plan draft prior to publication and will continue to provide input when updates are necessary.
 2. Agencies will provide timely updates to the HMIS staff regarding any changes to programs.
 3. Data Quality reports will be reviewed at a minimum of once a month by HMIS staff and the Designated Agency HMIS Contact at all HMIS Agencies in the CoC.
 4. Agencies throughout the CoC must work to prevent duplicate data.
 5. Agencies will monitor the creation of duplicate client records within the system and send requests to the HMIS Lead to correct at least quarterly.
 6. Agencies must review hard copy records and compare them to HMIS data to ensure accuracy.
 7. The HMIS Lead will provide new users with new user training and provide existing users with access to training throughout the year to reflect any system updates.
 8. The HMIS Lead will assist programs within their service area in correcting data and updating information as needed.
 9. Agencies that meet the data quality benchmarks will be periodically recognized by the CoC.

XI. Data Quality Plan Enforcement

- A. The HMIS Lead will take the following steps to enforce the Data Quality Plan:
1. The HMIS Lead will first provide additional technical assistance for Agencies that fail to meet the data quality benchmarks set forth in this document.
 2. If corrective action is not taken, the HMIS Lead will send the HMIS Agency a notice stating that they are noncompliant with the standards set for data quality. The Agency will be asked to submit a plan to the HMIS Lead describing how they intend to improve their data quality to meet North Dakota HMIS standards.
 3. If a plan of action is requested and is not submitted within the allotted time frame, the HMIS Lead may suspend all user accounts under that project for a period of no longer than seven days.
 4. After the suspension, user accounts will be restored, and the HMIS Agency will have the opportunity to correct data until the next month's review and will follow the same process as before. The HMIS Lead will report the suspension to the CoC Board.
 5. If the HMIS Agency's account needs to be suspended for a second time, the HMIS Lead may suspend user accounts for up to 30 days. Should a problem persist, or in the event that the Agency fails to submit a written plan, the HMIS Lead may suspend the Agency's ability to enter data into HMIS, and will contact

any appropriate state and federal funders, notifying these funders of the Agency's non-compliance with HMIS data entry mandates. The HMIS Lead will report the suspension to the CoC Board.

- B. The HMIS Lead will investigate all potential violations of any security protocols. An Agency's access may also be suspended or revoked if serious or repeated violations of HMIS Policies and Procedures occur by Agency users. Any user found to be in violation of security protocols will be sanctioned which may include, but are not limited to:
1. A formal letter of reprimand.
 2. Suspension of system privileges.
 3. Revocation of system privileges.

ADDENDUM B2 – LEAD AGENCY MEMORANDUM OF UNDERSTANDING

(Will need to be added once the LA is selected)

ADDENDUM C – WRITTEN STANDARDS FOR THE ADMINISTRATION OF ESG AND CoC PROGRAMS

I. Introduction

- A. The North Dakota Housing Finance Agency (NDHFA) is the Collaborative Applicant (CA) for the North Dakota Continuum of Care (CoC). A CoC works to coordinate a community-based process of identifying needs relating to the experience of homelessness and of building a system of housing and services to address those needs. The ND CoC works to establish local priorities for system planning and to evaluate system-wide performance with the goal of making homelessness rare, brief, and non-recurring.
- B. The Department of Housing and Urban Development (HUD) requires that a CoC establish and follow written standards for recipients and subrecipients providing assistance with CoC and Emergency Solutions Grant (ESG) Program funds.
- C. The North Dakota Commerce Division of Community Services (DCS) is the statewide recipient of ESG funds for the state of North Dakota.

II. Mandate Overview

- A. The CoC Program interim rule requires that these standards be developed in consultation with the ESG recipient(s) also funding projects within the CoC's geographic area.
- B. The specific standards that must be addressed are policies and procedures for:
 - 1. Evaluating individuals' and families' eligibility for assistance through the CoC Program;
 - 2. Determining and prioritizing eligible individuals and families for transitional housing, rapid re-housing, and permanent supportive housing assistance;
 - 3. Determining the percentage and amount of rent program participants must pay while receiving rapid re-housing assistance;
 - 4. For designated high-performing CoCs, determining and prioritizing individuals and families for homelessness prevention and rapid re-housing assistance, including the percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention and rapid re-housing assistance and the amount and duration of rental assistance; and the type, amount, and duration of housing stabilization and/or relocation services.
NOTE: The ND CoC is not considered a high-performing CoC.
- C. ESG recipients are also required to develop several similar policies and procedures for subrecipients to use when providing ESG assistance (state recipients may allow subrecipients to develop their own written standards) (see 24 CFR 576.400(d)). Although ESG recipients are not explicitly required to consult with CoCs on the development of written standards for providing ESG assistance, many of the ESG standards for prioritizing assistance will influence the development and implementation of the local plan to prevent and end homelessness, the implementation of coordinated entry system, as well as the development of the CoC's written standards.
- D. Ideally, CoCs and ESG recipient(s) should collaborate to coordinate and/or align their written standards to ensure all populations eligible for assistance within the geographic area are assessed and prioritized for available assistance as consistently as possible.

- E. The written standards for providing ESG assistance must include policies and procedures that address the following:
1. Evaluating eligibility for ESG assistance;
 2. Targeting and providing essential services related to street outreach activities;
 3. Admission to, diversion from, referral to, and discharge from emergency shelters;
 4. Assessing, prioritizing, and re-assessing the need for essential services related to street outreach;
 5. Coordination among other emergency shelters, essential services, homelessness prevention, and rapid re-housing providers as well as with other mainstream housing and service providers;
 6. Determining and prioritizing individuals and families for homelessness prevention and rapid re-housing assistance;
 7. Determining the percentage and amount of rental assistance and utilities each program participant must pay while receiving homelessness prevention or rapid rehousing assistance;
 8. Determining the amount and duration of rental assistance, including how the amount will be adjusted over time, as appropriate; and
 9. Determining the type, amount, and duration of housing stabilization and/or relocation services.
- F. Under the purview of HUD regulations and guidelines, DCS, as recipient of ESG funds, has the discretion to set local standards regarding rental assistance amounts, length of assistance available for participants, and other project components as necessary and has agreed to partner with the CoC to issue joint guidance to ESG subrecipients. All projects receiving ESG Program funds must comply in full with the applicable standards described below.

III. Definitions

- A. Emergency Solutions Grant (ESG) Interim Rule broadened existing emergency shelter and homelessness prevention activities, placing greater emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness by expanding prevention as an eligible use and adding a rapid rehousing component. ESG funds are authorized and intended for rapid rehousing, homelessness prevention, and emergency shelter. The interim rule updated the annual action plan requirements to include written standards for the provision of ESG assistance and performance standards for evaluating ESG activities.

ESG funds can be used for a variety of services, including: Emergency Shelter, short- or medium-term Rental Assistance, Housing Search and Placement, Utility Arrears, and Housing Stability Case Management. The Homelessness Prevention component includes various housing relocation and stabilization services and short- and medium-term rental assistance. DCS is the recipient of HUD ESG Program funds and administers this award via eligible organizations referred to as subrecipients.

ESG Program Eligible Components				
Street Outreach	Homeless Prevention	Emergency Shelter	Rapid Rehousing	HMIS

- B. Continuum of Care (CoC) Program Funds provide housing and supportive services to households with and without children experiencing homelessness. Projects funded under the CoC Program seek to assist households with attaining and sustaining permanent housing as quickly as possible.

CoC Program Eligible Components				
Transitional Housing	Rapid Rehousing	Coordinated Entry	Permanent Supportive Housing	HMIS

- C. Collaborative Applicant is the eligible applicant (state, unit of local government, private, nonprofit organization, or public housing agency) designated by the CoC to collect and submit the required CoC application information for all projects the CoC has selected for funding and apply for CoC planning funds on behalf of the CoC.
- D. Homeless Management Information System (HMIS) is a local information technology system used to collect client-level data and data on the provision of housing and services to individuals and families who are homeless or at risk of homelessness.
- E. HUD Homeless Categories: There are four federally defined categories under which persons are defined as homeless:
1. Literally Homeless
 2. Imminent Risk of Homelessness
 3. Homeless Under other Federal statutes
 4. Fleeing/Attempting to flee domestic violence
- F. At risk of homelessness is defined as individuals and families living in “housing that has characteristics associated with instability and an increased risk of homelessness. For ESG subrecipients, eligible households must align with the definition listed in the state approved Consolidated Plan.

IV. CoC Written Standards

All projects funded under the CoC and ESG Programs shall apply the following standards consistently for the benefit of all program participants. The CoC strongly encourages organizations and projects that do not receive the abovementioned funds to accept and utilize these standards.

- A. *General Standards Training on each of the general standards can be found on the CoC online training site. If your agency needs access to the site, please contact the CoC Coordinator.*
1. **Housing First Orientation.** The ND CoC practices a Housing First model of care that follows five core principals of practice:
 - a. Low Barrier Access: Immediate access to permanent housing with no housing readiness requirements.
 - b. Client Choice: Client centered approach that emphasizes client choice of housing options and level and time of supports currently available to them.
 - c. Recovery Orientation: Assures clients have access to a wide range of supports that help stabilize and thrive in housing and that care be provided with a harm reduction orientation aimed at reducing the risks and harmful effects associated with addictive and other harmful behaviors versus

expecting zero tolerance for these behaviors unless they threaten the rights or safety of others.

- d. Individualized client-driven supports: Supports are offered based on each client's unique needs and desires and are presented in a creative, ongoing, and culturally appropriate manner.
 - e. Social and community integration: Providers assist clients to integrate into their community and connect with natural supports that are healthy, to avoid isolation, and support long-term stability.
2. Fair Housing and Equal Opportunity. All recipients and subrecipients of CoC Program and ESG Program funding must comply with the non-discrimination and equal opportunity provisions of federal civil rights laws as specified at 24 C.F.R. 5.105(a), including, but not limited to the following:
- a. Fair Housing Act
 - b. Section 504 of the Rehabilitation Act
 - c. Title VI of the Civil Rights Act
 - d. Title II of the Americans with Disabilities Act
 - e. HUD's Equal Access Rule
 - f. Affirmatively Furthering Fair Housing. Providers must have non-discrimination policies in place and conduct assertive outreach to people least likely to engage in the homeless system. Organizations receiving CoC Program and ESG Program funding shall market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability; and, shall provide program applicants and participants with information, in writing, on their rights and remedies under applicable federal, state, and local fair housing and civil rights laws.
 - g. Integration and Accessibility (Fair Housing and Equal Opportunity). Housing and supportive services must be offered in an integrated manner, such that persons with disabilities may enjoy a meaningful life within the community. Organizations shall offer housing and supportive services to enable individuals with disabilities to interact with nondisabled persons to the fullest extent possible.
 - h. Reasonable Accommodations and Modifications for Persons with Disabilities. Organizations are required to provide reasonable accommodations and modifications for persons with disabilities. For federally funded housing, the recipient is responsible for paying for the modification. Organizations must inform applicants during the intake process of their right to request a reasonable accommodation or modification. A reasonable modification is a structural change, and a reasonable accommodation is a change to rules, policies, or services so that a person with a disability has equal opportunity to use and enjoy a dwelling unit or common space. An example of a reasonable modification is installing a grab bar in the bathroom of a person with a disability, while examples of reasonable accommodations include, permitting a person with a disability to have a service animal.
 - i. Discrimination Based on Actual or Perceived Gender. HUD's Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity. Final Rule (Equal Access Rule) requires that HUD's housing projects be made available to individuals and families without regard to actual or perceived sexual orientation, gender identity, or marital status. The rule

defines “gender identity” to mean “actual or perceived gender-related characteristics.” The final rule also prohibits owners and administrators of HUD-assisted or HUD insured housing, approved lenders in an FHA mortgage insurance program, and any other recipients or subrecipients of HUD funds from inquiring about sexual orientation or gender identity to determine eligibility for HUD-assisted or HUD-insured housing.

- j. There is a limited exception to this rule: Temporary, emergency shelters and other buildings and facilities that are not covered by the Fair Housing Act because they provide short-term, temporary accommodations may provide sex-segregated accommodations, which they sometimes do to protect the privacy and security of individuals when the buildings and facilities have physical limitations or configurations that require shared sleeping quarters or shared bathing facilities. For purposes of this rule, shared sleeping quarters or shared bathing facilities are those that are designed for simultaneous accommodation of multiple individuals in the same space. For example, a single-user bathing facility with a lock on the door is not designated for simultaneous occupancy by multiple individuals, so it is not a “shared bathing facility” for purposes of the Equal Access Rule or this rule.
- k. Organizations should ensure that its services do not isolate or segregate victims of domestic violence based upon actual or perceived gender identity.
- l. Discrimination Based on Household Composition. Organizations cannot discriminate against a group of persons presenting as a family based on the composition of the family, the age of any member of the family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. The people who present together for assistance, regardless of age or relationship, are considered a household and are eligible for assistance as a household. Projects that serve families with children must serve all types of families with children; if a project targets a specific population, (e.g. homeless veterans), these projects must serve all families with children that are otherwise eligible for assistance, including families with children that are headed by a single adult or consist of multiple adults who reside together.
- m. Preventing Family Separation. In an effort to maintain family unity, for housing projects serving households with children, the age and gender of a child under age 18 shall not be used as a basis for denying any family’s admission, nor may a recipient deny admission to any member of the family (e.g., 15-year old son). Projects will make every attempt possible to avoid family separation, unless absolutely necessary for the safety and well-being of the family.
- n. Guidance for Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities. Organizations operating ESG-single-sex emergency shelters (or other ESG- and/or CoC facilities) may not make a determination about services for one participant based on the complaints of another participant when those complaints are based on a participant’s gender identity or non-conformity with gender stereotypes. For the purpose of assigning a participant to sex-segregated or sex-specific services, it is a requirement that intake staff and emergency housing providers ask a transgender participant which group or service the participant wishes to join. The organizations must take reasonable steps to address safety and privacy concerns; the organization should provide for privacy in bathrooms and dressing areas. For instance, organizations may install privacy curtains or

partitions. When deciding how to house a victim of domestic violence, an organization that provides sex-segregated housing may consider on a case-by-case basis whether a particular housing assignment would ensure the victim's health and safety. A victim's own views with respect to personal safety deserve serious consideration. The organizations should ensure that its services do not isolate or segregate victims of domestic violence based upon actual or perceived gender identity.

- o. Prioritized Subpopulations and Fair Housing Implications. Organizations shall comply with applicable civil rights laws, including the Fair Housing Act. Within this framework, these standards establish subpopulations to be prioritized for housing and services that align with the identified needs of the local community and the goals of the Federal Strategic Plan to End Homelessness. Subpopulations may be prioritized as long as doing so does not discriminate against any protected class under federal nondiscrimination laws (e.g., the housing may be limited to homeless veterans, victims of domestic violence and their children, or chronically homeless households); subpopulations may also be prioritized according to who needs the specialized supportive services that are offered by the project (e.g., substance use disorder treatment, domestic violence services, or a high intensity package of services designed to meet the needs of hard-to-reach homeless persons).
 - *Dedicated versus Prioritized Projects* and/or beds that are dedicated to serving a specific subpopulation must continue serving only this subpopulation. (For instance, a Permanent Supportive Housing project that is dedicated to serving households experiencing chronic homelessness must continue serving those households). This means that if two otherwise eligible households are seeking admission into the program, one who falls within the designated prioritized subpopulation and one who does not, the household who is in the designated prioritized subpopulation must be given priority for admission. If there are no persons on a waiting list or applying for entrance to the program who fall within the dedicated or first priority subpopulation, organizations should not hold the unit vacant, but instead should serve the next prioritized subpopulation who may benefit from the services being provided.
 - *Fair Housing Implications.* CoC Coordinated Entry may establish priorities for subpopulations by project type (i.e. Permanent Supportive Housing or Transitional Housing), but organizations may not set more restrictive priorities. For instance, while a Permanent Supportive Housing project may prioritize households experiencing chronic homelessness with a qualifying disability per CARES policies, beds may not be reserved to persons with a specific disability (i.e. physical disability). If an individual, who is otherwise qualified, but who does not have a physical disability, seeks admission and would benefit from the services offered, this person may not be excluded from the project. Organizations may reserve beds for persons with HIV/AIDS if the housing also receives funding from the Housing Opportunities for People with AIDS program (HOPWA).
3. Coordinated Entry/CARES: North Dakota's Coordinated Entry System is called Coordinated Assessment, Referral, Entry and Stabilization (CARES) System. All ESG and CoC funded projects are required to participate in CARES and abide by CARES policies and procedures. CARES policies and the Written Standards are therefore intended to be in alignment. All CARES documents can be found on the [CARESLINK website](#).

4. Participation in HMIS: HUD requires that CoC and ESG recipients and subrecipients use the CoC designated HMIS of the CoC and abide by all HMIS and CoC policies related to the use of HMIS. HMIS policies can be found on the [ND ICA website](#).
5. CoC Membership: Each CoC or ESG funded agency is required to be a member of the CoC General Membership Committee. The CoC is a member organization driven by the collaborative efforts of its members. Member participation is needed to assure that the collective CoC goals and plans are representative of the diverse needs of our state.
6. Participant Inclusion: Each CoC funded project is expected to engage participants in ongoing program evaluation and quality improvement processes. Toward that end, at a minimum, each project is required to survey or interview participants at least annually to obtain feedback on program service quality, the housing and service environment, and opportunities for improvement. Each CoC or ESG funded organization must utilize participant feedback to improve program design and implementation.
7. Access to Mainstream Services: The CoC expects that every organization that is funded through the CoC or ESG programs will coordinate with and access mainstream and other targeted homeless resources. Organizations should assess and assist participants with obtaining any mainstream resource for which they may be eligible for including: TANF, Veterans Health Care, Supplemental Nutrition Assistance Program (SNAP), Medicaid, Federally Qualified Health plan (Affordable Care Act), CHIP, SSI/SSDI, Workforce Investment funds, and Welfare-to-Work. Where possible, organizations should streamline processes for applying for mainstream benefits such as the use of a singular form to apply for benefits or collecting necessary information in one step.
8. Collaboration with Educational Entities: For projects that serve households with children, program policies must be in place to ensure children are enrolled in school and connected to appropriate services in the community, including early childhood projects such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney Vento education services. The CoC encourages projects to utilize the CoC Educational Agreement as a standard for engagement and collaboration.
9. Violence Against Women Act (VAWA): VAWA requires that CoC and ESG programs:
 - a. Provide participants with the HUD Notice of VAWA Occupancy Rights (form HUD-5380) and Self-Certification (from HUD-5383);
 - b. Add a lease addendum that includes VAWA protections; and
 - c. Allow participants to make emergency transfers (form HUD-5381) when safety is a concern.
10. Transition and Move On Strategy Principles:
 - a. Transition should be a voluntary process that participants choose.
 - b. Collaboration of mainstream housing and services must be fostered.
 - c. Connections to community-based supports are necessary for housing stability.

11. Termination and Grievance Procedures: Organizations must have a written grievance procedure, including a formal process for participants to provide feedback.
- Organizations must have a written termination policy outlining project rules and termination processes, including a formal due process.
 - Terminations may only occur in the most severe circumstances, which include, but are not limited to consistent failure to make rental payments or adhere to a repayment schedule, consistent violation of the lease, or destruction of property.
 - Termination from a project should not prohibit the household from being readmitted into the program at a future date.
 - The termination process, at a minimum, must consist of:
 - Providing the participant with a written copy of the rules and the termination process before the participant begins to receive assistance;
 - Written notice to the program participant containing a clear statement of the reasons for termination: e.g. lease obligations, tenant payments, damage to the property.
 - A review of the decision, in which the program participant is given the opportunity to present written or oral objections/appeal before a person other than the person (or a subordinate of that person) who made or approved the termination decision;
 - Prompt written notice of the final decision to the program participant; and
 - Providing Notice of VAWA Occupancy Rights.

B. Standards for the Allocation of Funds

Housing Type	Funding	Homeless Category	Core Services	Eligibility	Prioritization (aligned with CARES Prioritization policy)	*Level of Assistance
Outreach	ESG	1	Engagement Case management Transportation Connection to mainstream services Housing Stability Plan Diversion screen	Persons unsheltered or in places not meant for human habitation.	N/A	N/A
Homeless Prevention	ESG	At-risk, Homeless: 2,4	Deposit Stabilization Short to medium term rental assistance Utilities Assistance Housing Stability Plan Connection to mainstream Services Diversion screen	Persons who would be unsafe or literally homeless without assistance. Income at or below 30% AMI.	Persons should be prioritized based on highest vulnerability defined as those most likely to enter homelessness without assistance.	Relocation/ Rental Assistance sufficient to prevent homelessness

Emergency Shelter	ESG	1,2,4	Shelter or motel voucher for up to 30 days with option for extension. Housing Stability Plan Connection to Mainstream Services Meals Transportation Case management at least 1x weekly Diversion screen	Persons who are literally homeless or escaping violence or stalking. Funder restrictions may limit shelter to specific sub-populations (youth, families, domestic violence, etc.). Not a current risk to other staff or residents.	The CARES Shelter Screening tool should be used to prioritize limited shelter beds and vouchers to those who are the most vulnerable.	N/A
Transitional Housing	CoC ESG	1,4	Rental Assistance for up to 24 months Case Management with weekly contact including in-home visits Linkage to mainstream services Utility Assistance Housing stability plan	Persons with low to moderate barriers exiting homelessness and entering transitional housing services. Homeless exiting shelter. Persons who will be successful w/ short-term help. Capacity to increase income (earned or other cash income), skills. Persons who can't afford housing w/ income until access public housing assistance. Youth w/ or working towards GED or HS diploma. Youth exiting foster care. Persons fleeing DV.	Category 1: Unsheltered Category 1: Other Category 4 Category 3: Youth programs ONLY Category 2 Unsafely or unstably doubled up (MN OEO only)	Up to 24 months of rental assistance with 3 month assessment of need.
Rapid Rehousing	CoC ESG	1,4	Short to medium term rental assistance or utility subsidies Security deposits Voluntary Case management with weekly contact and in-home visits Linkage to mainstream resources Housing Stability planning	Individuals who are literally homeless (HUD) or imminently homeless (ESG) and have a strong chance to increase their income and stabilize their housing with short (up to-6 months) to medium (7-12 months) length support.	Category 1: Unsheltered Category 1: other Category 4 Category 2 Unsafely or unstably doubled up (MN OEO only)	Short term (up to 3 months) Medium term (up to 24 months) No income requirement at entry

Permanent Supportive Housing	CoC	1,4	Rental Assistance for length of eligibility Other direct support services (childcare, transportation, utility) Voluntary Case management with initial weekly contact up to monthly and regular in-home visits Linkage to mainstream resources Housing Stability planning	Persons who are literally homeless or exiting TH or RRH AND has at least one household member with a documented disability in the family. CH must have an adult member with a disability and have at least one year of homelessness or 4+ episodes in the past four years.	Category 1: Unsheltered & Disabled Category 1: Emergency Shelter & Disabled Exiting TH: entered as homeless with a Disability Highest priority homeless	N/A
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*Note that all grantees are responsible for understanding and abiding by the allowable costs for their respective programs as listed in their annual grant agreement or amended grant agreement. Grantees should also refer to the eligible program components listed in the HEARTH Act.

C. Performance Standards

1. The project must target those in most need of assistance by following CARES Prioritization Policies.
2. Projects should strive to reduce the length of time persons are homeless:
 - a. Assuring data is current (entered in a timely manner per CARES policies) and accurate when entering and exiting households in HMIS or alternative databases
 - b. Support clients in housing search in order to secure housing more rapidly
 - c. Utilize the Housing First approach providing permanent housing to people experiencing homelessness quickly without preconditions or service participation requirements, thus ending their homelessness and serving as a platform for which they can pursue personal goals and improve their quality of life.
3. Projects should assure all staff participate in all trainings required by the CoC or funders.
4. Programs must abide by Fair Housing and Equal Access Rules.
5. Programs design must support housing stability by:
 - a. Facilitating connections to mainstream and community supports;
 - b. Having contact with households as least weekly during the first year if services are provided and have regular in-home contact;
 - c. Focusing on increasing household income, both earned and unearned;
 - d. Using creative engagement strategies; and
 - e. Integrating transition strategies to support smooth exit from program assistance.
6. Program funded activities effectiveness at fulfilling the needs they were intended to meet

7. Programs compliance with these Written Standards
 8. Projects have a plan to review and use of performance outcomes to improve performance
- D. Documentation Requirements: All programs must verify and retain in each household file proof of program eligibility. This may include one or more of the following depending on funding source:
1. At-Risk of Homelessness Certification – ESG programs must complete the form and provide appropriate document as indicated on the form.
 2. Homeless Definition Certification: Must be completed for each household receiving ESG or CoC housing program.
 3. Disability Verification – CoC PSH will need to document disability status according to HUD requirements. A sample form is available on the CoC website.
 4. Income Documentation – All sources of household income must be verified and documented at intake and updated every three months (ESG and CoC TH and RRH) or yearly (COC PSH).
 5. Prevention Screen: All ESG funded prevention programs will complete the CARES Prevention Assessment to determine level of assistance.
 6. CARES Housing Assessment: All ESG and CoC funded housing programs will complete the CARES Housing Assessment (currently the VI-SPDAT + Supplement) prior to entry into TH, RRH or PSH.
 7. Self-Certification: Must be completed if required verifications/other documentation cannot be secured.
 8. Lease Agreement: Tenants of ESG and CoC scattered site housing programs hold their own lease agreement.
 9. VAWA Forms: All ESG and CoC housing programs must provide recipients with VAWA forms HUD-5380 Notice of Occupancy Rights and HUD-91067 Lease Addendum.
 10. Housing Plan: A Housing Plan must be completed for all individuals that receive a housing assessment and are determined eligible for services.
 11. Rent Reasonableness: ESG and CoC programs must complete and file a Rent Reasonableness form for rental assistance above Fair Market Rent (FMR).
 12. Habitability Standards: All units must meet Habitability Standards before financial assistance can be provided for rent, security deposits, rental arrears, and utility payments.
 13. Lead-Based Paint Inspection: Lead-Based Paint Inspection is required for housing for properties if built before 1978 and if a child age 6 or younger or a pregnant woman will be residing in the unit.
 14. Annual Reports: CAPER or HUD APRs are due for all funded programs on or before the annual deadline.
 15. Universal Data Elements: All projects are required to collect and report upon the required Universal Data Elements for their program. Data is to be current and accurate when reporting.
- E. Data Security & Privacy All programs must assure they are following HMIS data security and privacy requirements including but not limited to completing the CARES and ESG Release of Information. A full list of data security and privacy requirements

can be found on the ND HMIS website in the HMIS Policy Manual. ROI's must be signed for each adult member over age 18.

F. Performance Evaluation

Outcome Measures. The CoC has established the following targets for CoC and ESG programs related to performance outcomes:

Measurements	Outreach	Shelters	TH	RRH	PSH
Returns to Homelessness	25% or less will return to homelessness	25% or less will return to homelessness	10% or less will return to homelessness	10% or less will return to homelessness	5% or less will return to homelessness
Housing Retention	N/A	N/A	80% or more of all participants will exit to permanent housing destinations	80% or more of all participants will exit to permanent housing destinations	90% or more of all participants will remain stable in PSH or exit to other permanent housing destinations
Job & Income Growth	N/A	N/A	25% or more of adult participants will increase income from employment or other sources	25% or more of adult participants will increase income from employment or other sources	25% or more of adult participants will increase income from employment or other sources

The ND-500 CoC Written Standards for ESG and CoC Programs were approved by the ND CoC Board on April 20, 2020 and the full CoC membership on May 6, 2020. These written standards are pending review by the ND Department of Commerce.

CoC Coordinator, ND Continuum of Care

Date

Chair, ND CoC Board

Date

ADDENDUM D1 – REALLOCATION POLICY

May 2020

The North Dakota Continuum of Care (CoC) has created this process to guide the CoC in determining if, when, and how the CoC should reallocate funds. Reallocating funds is one of the tools our CoC uses to make strategic improvements to our homelessness system. Through reallocation, our CoC can create new, evidence-informed projects by eliminating projects that are underperforming, underutilized, or are more appropriately funded from other sources. While reallocation can be complicated and does not come without risk, it is a necessary part of ensuring that our CoC's homeless assistance system meets the needs of people experiencing homelessness.

What is Reallocation?

Reallocation refers to the process by which our CoC shifts funds in whole or in part from one or more existing CoC funded projects that are eligible for renewal to create one or more new projects. A reallocated project must be a new project that serves new participants or is an expansion project serving additional clients.

What types of projects can be reallocated?

The annual CoC Program Competition Notice of Funding Availability (NOFA) dictates what types of projects may be created through reallocation in a given competition. For example, in FY20, eligible project components include: Permanent Supportive Housing, Permanent Rapid-Rehousing, Joint Transitional-Rapid Rehousing, HMIS, or Coordinated Entry. New reallocated projects applied for from the agency reallocating funds must include a component change (i.e. TH to PSH or RRH to PSH) or a significant change in the program's population (i.e. youth to single CH).

Identifying Projects for Reallocation

The CoC Board, Ranking Committee, and CoC staff all assist in identifying projects which may be considered for reallocation. Projects may also choose to offer all or a portion of their renewal funding for reallocation during the CoC Competition on the Intent to Apply form.

Various factors will be considered for identifying projects for reallocation including:

- a. Regional need: Existing inventory, system gaps, duplication or over-abundance of a project type, population/sub-population served.
- b. Program performance: Utilization, data quality, outcome performance, service model, coordination with other services, CES participation. If applicable, the CoC will first attempt to provide technical assistance to underperforming projects through the *CoC Retention and Performance Improvement Plan*. If agencies neglect to follow through with the identified plan or show performance improvement after 1 year, they may be at risk of reallocation.
- c. Fiscal Management: Spending down of grant funds, audits, fiscal practices, financial reports, cost effectiveness, matching funds.
- d. Other system needs: Coordinated entry and HMIS funding needs, potential grant mergers/collaborations, and other funding resources or restrictions (both new and existing).

Underperforming, underutilized, financial mismanaged, or low-need projects may be targeted for reallocation at any time but are most likely identified following an annual performance review or during the CoC competition process. However, when appropriate, the CoC is dedicated to first working with any underperforming or underutilized project to address deficiencies prior to recommending for reallocation. The CoC feels it is worth the investment to increase the capacity of existing projects and agencies to meet the needs of our region.

Reallocation Process

If a targeted project is not interested in or been responsive to a CoC Project Improvement Plan, a project is targeted for reallocation. The CoC will contact the project in person and in writing, notifying the project of the reason for consideration and to help develop a transition plan. The transition plan will be developed to help assure compliance with other funding commitments and prevent anyone from becoming homeless as a result of the reallocation.

ADDENDUM D2 – RANKING & REVIEW POLICY

The North Dakota Continuum of Care (CoC) requires an annual project review for all HUD Continuum of Care and Emergency Solutions Grant Projects. This policy specifically applies to projects seeking funding under the annual HUD Continuum of Care competition.

These conditions are designed to inform Performance Evaluation and NOFA Ranking Committee deliberations and provide all new and renewal applicants with clarity regarding how ranking and prioritization occur.

IMPORTANT PROJECT APPLICATION DATES & DEADLINES:

Each year, the CoC will publish annual HUD CoC Competition deadlines that include both local and HUD deadlines. Any agency applying for the CoC Competition must comply with the published deadlines or risk point loss and possible ineligibility for the funding competition. The dates and deadlines will be published on the CoC website and sent out via email through the CoC email list. Projects who do not submit their project Application Packet by the CoC deadline will not be eligible to be ranked.

ELIGIBILITY

To be eligible for inclusion in the CoC Evaluation and Ranking process, all projects must pass all facets of the CoC Application process including:

1. HUD Threshold Requirements including, but not necessarily limited to (*please go to the HUD competition page for a full list of HUD Threshold requirements*):
 - a. Applicant has a DUNS # and has current SAM registration.
 - b. Applicant is eligible to receive HUD funding (i.e. a nonprofit organization, state or local government, instrument of a state or local government or public housing agency, as such term is defined in 24 CFR 5.100).
 - c. Applicant enters or will enter (if a new applicant) project data in HMIS or CoC approved alternative database if a Victim Service Provider (VSP).
 - d. Applicant demonstrates financial and management capacity and experience to successfully carry out project.
 - e. Applicant submits required certifications as required in the NOFA.
 - f. Applicant agrees to only serve persons who are eligible as defined in HEARTH Act regulations.
 - g. Project draws down funds from LOCCS/eLOCCS at least quarterly.
2. CoC Eligibility and Threshold Requirements:
 - a. Members of the CoC participates in CoC planning (CoC and local homeless committee meeting attendance, responds to information requests, etc.);
 - b. Participation in or commitment (if a new project) to participate in Coordinated Entry;
 - c. Assure linkage of households to mainstream services using CoC tools;
 - d. Project assurance to document participant eligibility;
 - e. Project history and or assurance (if a new applicant) to maintain current and clean data and respond to quality and compliance issues in a timely manner;
 - f. History (renewal projects only) or agreement to provide timely documentation and reports;
 - g. Ability to manage funds appropriately;

- h. Ability to achieve CoC utilization and performance standards or if not achieved, identify a performance improvement plan approved by the CoC;
 - i. Design of project is cost effective, population and project type appropriate, incorporates CoC core principles and is appropriately staffed;
 - j. Compliance with or assurance to complete required CoC trainings; and
 - k. Adherence to CoC Policies:
 - i. Prioritization Policies
 - ii. School Enrollment and Connection of Services Policy
 - iii. Family Separation (TH only)
 - iv. Written Standards for ESG and CoC Assistance
 - v. Coordinated Entry
3. Project adheres to all local CoC Competition deadlines:
 - a. Project submits an Intent to Apply and Threshold Assessment by designated deadline; and
 - b. Initial and final Project Application submitted in e-snaps and via PDF by deadline.
 4. Commitment to integrate Housing First and Low Barrier Access Principles and Policies into project;
 5. Participation in HMIS (or commitment to participate if a new applicant), unless project is designated as a VSP. If a VSP, agree to enter data into a CoC approved equivalent database; and
 6. Provide Annual Performance Reports to the CoC at least 15 days prior to submission to HUD for pre-review.

GUIDANCE ON REQUIRED RANKING AND TIERS

The CoC will review all projects and rank in either Tier 1 or Tier 2 according to CoC ranking criteria including: project quality, past performance, and regional need. Tier 1 projects are more likely to be renewed by HUD. Tier 2 projects are conditional and will depend on CoC Score, Project Score, and Rank. HUD will award a point value to projects in Tier 2. Projects will be able to straddle Tier 1 and Tier 2, but the portion in Tier 1 must adequately fund the project in the case that funding in Tier 2 is not awarded.

New or Expanded Project Ranking Priority Bonus: The CoC will award bonus points to projects based on project type to help prioritize new or expanded project applications that fill the gaps and needs within the CoC. New or expanded projects will receive bonus points based on the following criteria.

Project Type	Eligibility Type	Priority Bonus	Justification for Priority
New Transitional Housing-Rapid Rehousing (TH-RRH) projects that serve youth, families, and individuals.	Bonus or Reallocation	5	There is not sufficient shelter coverage in our rural region. Fixed site TH, with ability to transition to RRH rapidly, helps address the need to have immediate access to housing and gain rental history necessary to find scattered site housing. TH-RRH is more cost effective and client friendly than motel vouchers.
New Supportive Services Only (SSO) projects for the CoCs <u>Coordinated Entry System</u> .	Bonus or Reallocation	4	CE needs to be sufficiently funded to assure the CoC is compliant with HUD and to help the CoC operate a system that is capable of reaching our goal to end homelessness.
New or expanded Permanent Supportive Housing (PSH) projects that serve chronically homeless individuals, unaccompanied youth, and families.	Expansion, Reallocation or Bonus	3	Sufficient PSH is necessary to continue to prioritize serving most vulnerable. CH for singles and families remains the highest unmet need on the CoC Coordinated Entry priority list, but MN Housing Supports is being expanded to all regions in response and 2 other planned state funded fixed site PSH projects have been prioritized by the region.
New or expanded Rapid Rehousing (RRH) projects for homeless individuals, unaccompanied youth, and families coming directly from the streets, emergency shelter or fleeing domestic violence.	Expansion, Reallocation or Bonus	2	Rapid rehousing continues to have a high unmet need for both singles and families. The CoC has identified a system gap in RRH for families.
HMIS expansion projects.	Reallocation	1	The CoC currently funds HMIS at over the targeted 2.5% of our regions ARD.

SCORING & RANKING PROCESS: HMIS Projects

The CoC recognizes that a quality Homeless Management Information System (HMIS) is not only required by HUD but is used as a valuable tool to operate and evaluate our regional homeless response system. However, ranking and scoring HMIS like Supportive Housing Projects is not feasible due to the unique aspects of our statewide system. Therefore, the CoC will rely on the statewide HMIS Board to annually evaluate our State System Administrator's performance and provide our CoC with a letter of review and recommendation for renewed funding or reallocation. Furthermore, the CoC recognizes that a robust homeless management information system needs sufficient funding and therefore will assure renewed funding of our system by placing one or more HMIS applications for at least 2.5% of the CoC's ARD at the top of Tier 1 if the request comes from the designated State System Administrator. Requests for over the ARD or 2.5%, whichever is greater, may be placed in Tier 2.

SCORING & RANKING PROCESS: Supportive Housing Projects

The following describes the CoC process to score and rank supportive projects for CoC funding. It should be noted that the CoC uses “scoring”, “reallocation”, and “ranking” as three distinct steps. Scoring informs, but does not dictate, the final ranking decisions. Where ranking and scoring do not correlate, the NOFA Ranking Committee may recommend adjustments. The Committee will indicate in comments why the project is ranked in their position versus directly following scoring.

Scoring criteria: The CoC Performance Evaluation Committee or other designated committee is responsible for reviewing, updating, and distributing Ranking Criteria to the CoC Board for approval each year. If substantive changes occur, the policy will be taken to the CoC membership. The process utilizes non-biased, objective criteria based on the HUD ranking tool, established CoC priorities, and project performance. The CoC uses an objective **HMIS Ranking Report**, the **Project Threshold Assessment**, and a **CoC Ranking Scorecard** that incorporates both an agency self-assessment and required attachments. The Ranking Committee may adjust the presented documents based on verification and review of documents presented.

Specifically, ranking incorporates the following eight categories:

1. Financial: Fiscal responsibility, draw downs, resources/leverage, and cost effectiveness of project.
2. Regional Priorities: Regional need for project type and target population/subpopulation based on Coordinated Entry data and annual needs/gaps assessment.
3. HUD Priorities: Project commitment to meeting HUD Priorities.
4. Engagement: Agency commitment to engaging in regional planning including membership/participation in the CoC Board and Committees and participation in local homeless committees/coalitions;
5. Policy & Reporting Compliance: Adherence to funder and CoC policies, training, and reporting standards;
6. Project Design and Services: Project incorporates core principals adopted by the CoC including: housing first, low barrier access, trauma informed, motivational interviewing, creative engagement, and client centered care. Principals must be incorporated into education/training, policies, and practices. The project must also demonstrate history or ability to link to mainstream resources and educational services (if serving youth and families).
7. Project Performance: Performance is measured through an HMIS Dashboard or duplicate dashboard (if VSP) that includes the following: HUD Annual Performance Report (APR), project utilization rate, and returns to homelessness rate. Performance review also takes into consideration acuity of households served.
8. Data Quality: HMIS and CES Data quality and responsiveness to HMIS/CoC data requests.

Scoring & Ranking Process

1. **Pre-Application**

- a. The CoC solicits interest and designates a Ranking Committee identified through a public application process with no representatives being accepted from applicant agencies (staff, clients or board members).
- b. The CoC solicits Pre-application and Project Threshold Assessments to renewal applicants and an open invite for new projects via the CoC email list and notice at other regional meetings or public notices.

- c. The CoC Coordinator follows-up with agencies interested in applying for new or expanded projects.
- d. Within 10 days after the NOFA publication, Application Packets are posted on the CoC website.
- e. Ranking process, criteria, submitted pre-applications and timeline are presented at first CoC meeting after the NOFA release. Any proposed updates to the policy in response to the NOFA are presented and voted upon at this time.
- f. The CoC promotes and hosts an application lab to assist with completing the application in e-snaps.

2. **Submission:** Project applicants submit application packet (score card, project application, and required supporting documentation) to the CoC by deadline to be eligible for ranking.

3. Review and Ranking

- a. The CoC Coordinator collects and organizes the application ranking materials and shares with the ranking committee.
- b. The committee reviews the application packet (score card, project application, and supporting documentation) and scores each application. This includes:
 - i. Reviewing project eligibility.
 - ii. Validating applicant self-score, noting any discrepancies.
 - iii. Identifying specific concerns or noting questions for the applicant.
 - iv. Assigning a preliminary score and rank to each project.
- c. The Ranking Committee meets to collectively review and align scores and ranking. Each project is assigned a score based on the percent of eligible points and any adjustments (note adjustments may be made for extenuating circumstances like a change in agency leadership, disaster, etc.).
- d. CoC Coordinator provides each project with the Committee's recommended score and rank via email.
- e. Projects are given 3-5 days to respond with clarification or corrections (exact time is posted on annual competition calendar).
- f. If received, updated information is reviewed by the Ranking Committee. Scores may be adjusted if validated (supporting documentation or appropriate clarification is provided). If needed, the CoC Ranking Committee meets to deliberate score adjustments.
- g. The Committee will recommend 1-3 ranking scenarios to the CoC Board and membership based on project score, CoC priorities, and eligible funding. When ties exist, the Committee shall rank the following preferences:
 - i. The project with higher housing stability and the project with the least returns to homelessness shall be ranked first.
 - ii. Projects with existing clients shall also be ranked higher if scores are identical or within 1 point.

4. Vote on Rank

- a. The CoC Ranking Committee presents final applicant scores and 1-2 tiering options to the CoC membership. Although rare, members may reject the proposed options and identify another desired option. The membership votes on proposed rank and tier.

b. Projects are notified of final Rank, Tier, and inclusion/exclusion in the Collaborative Application. Projects not accepted or ranked in Tier 2, are also again notified of their ability to appeal to the CoC and HUD.

5. **Public Posting:** The approved Priority Listing will be placed on the CoC website and mailed to the CoC mailing list, which includes Project Applicants.