

Georgia Balance of State Continuum of Care Policies and Procedures

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Acronyms

AHAR	Annual Homeless Assessment Report
APR	Annual Performance Report
ARA	Annual Renewal Amount
ARD	Annual Renewal Demand
BoS	Balance of State CoC
CE	Coordinated Entry
CH	Chronically Homeless
CoC	Continuum of Care
CDBG	Community Development Block Grant
DUNS #	Data Universal Numbering System
ESG	Emergency Solutions Grant (Federal)
e-snaps	Online Application and Grants Management System for HUD's Homeless Programs
FMR	Fair Market Rent
FPRN	Final Pro Rata Need
GIW	Grant Inventory Worksheet
HDX	Homeless Data Exchange
HEARTH Act	Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009
HMIS	Homeless Management Information System
HUD	Department of Housing and Urban Development (Federal)
IRT	Independent Review Team
NOFA	Notice of Funding Availability
PH	Permanent Housing
PIT	Point-In-Time (annual count of homeless persons)
PPRN	Preliminary Pro Rata Need
PRA	Project-based rental assistance
PSH	Permanent Supportive Housing
RFP	Request for Proposals
RRH	Rapid Re-Housing
SHP	Supportive Housing Program
S+C	Shelter plus Care Program
SRA	Sponsor-based Rental Assistance
SRO	Single Room Occupancy
TH	Transitional Housing
TRA	Tenant-based Rental Assistance
VASH	Veteran's Affairs Supportive Housing
VAWA	Violence Against Women Act

Introduction and Purpose

The purpose of this manual is to provide all Balance of State Continuum of Care (BoS CoC) members with a document containing the policies and procedures approved by the CoC Board of Directors. This document has been created to incorporate universal policies and procedures, and references to other guideline documents previously created and approved. Those prior texts are included for ease of reference in the appendix.

The information in the manual spans from Board of Director guidelines, to CoC adopted policies and procedures, to measures necessitated by state or federal laws and regulations. Consequently, several policies and procedures are unalterable.

Background

The Georgia Balance of State Continuum of Care (generally referenced in this document as “BoS CoC” or “Continuum”) is the group composed of representatives of relevant organizations that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid rehousing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless or at risk of homelessness persons for a specific geographic area. This group serves as the U.S. Department of Housing and Urban Development’s (HUD) recognized decision-making body for the Continuum rule at 24 CFR 578, Subpart B, entitled “Establishing and Operating a Continuum of Care.”

The geographical area currently covered by the BoS CoC includes the 152 counties not covered by eight local Continuum plans. Local plans exist for the City of Atlanta, Fulton County, DeKalb County, Cobb County, Athens-Clarke County, Augusta-Richmond County, Savannah-Chatham County, and Columbus-Muscogee County.

General Policies

HEARTH Act Goals

The GA BoS CoC has adopted goals related to the evaluation of project and system performance in accordance with the HEARTH Act:

- Reducing the length of time Homeless
 - Goal of 30 days or less average length of time homeless
- Reducing the Number of Homeless People
- Reducing the Number of Newly Homeless
- Reducing Homelessness Recidivism
- Increasing Exits to Permanent Housing
- Increasing Income and Employment
- Increasing access to mainstream benefits.

The CoC has adopted the goals and deadlines set forth by the Federal government for ending Veteran, Chronic, Youth, and Family Homelessness. Specifically, the GA BoS CoC has adopted the following deadlines for each of the following goals:

- End Veteran Homelessness as soon as possible
- End Chronic Homelessness by 2017
- End Family Homelessness by 2020
- End Youth Homelessness by 2020

Coordinated Entry

Each Continuum is responsible for establishing and operating a centralized or coordinated assessment system that will provide a comprehensive assessment of the needs of individuals and families for housing and services. This system is called Coordinated Entry (CE) in the GA BoS CoC.

A Coordinated Entry System is defined to mean a centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.

As required by HUD, in the GA BoS CoC all CoC and ESG grantees must participate in a CE system. Prior to establishment of CE in each of the GA BoS CoC communities, CoC grantees are required to conduct a VI- or F-VI-SPDAT and use prioritization lists in HMIS or alternate Victim Service Providers' prioritization lists to prioritize clients for housing. The GA BoS CoC will provide toolkits, trainings, support, standards, guidance, evaluation, and data analysis. Each local CE plan may be tailored to unique community needs and available resources but must be approved by the GA BoS CoC.

The GA BoS CoC has developed CE Written Standards Policies and Procedures, CE Regional Planning Guide, and CE Diversion and Prevention Screening Tool. (Appendix A)

Criminalization of Homelessness

People living in homelessness are often cited or arrested for activities necessary for survival for those living in places not meant for human habitation. As a result, they end up with criminal records that can become a barrier to obtaining employment or housing.

The GA BoS CoC will not participate in or support any activity that results in the criminalization of homelessness and seeks to engage law enforcement organizations to find alternative resolutions to address the behaviors that lead to arrest. Agencies within the GA BoS CoC, accordingly, will work to reduce barriers to housing and services as a result of criminal records due to homelessness.

Prohibition against Involuntary Family Separation

The GA BoS CoC is committed to keeping children under the age of 18 with their families. Specifically, emergency shelter, transitional housing, or permanent housing providers serving families with children under age 18 shall not deny admission to any family based on the age

or gender of any child under age 18.

Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. Any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such. (Appendix B)

Education Policy

The GA BoS CoC and its member agencies strive to meet the educational needs of the homeless youth and families that they serve. The GA BoS CoC has a policy that is required to be carried out by all ESG and CoC-funded programs within the CoC. (Appendix C)

Ending Veteran Homelessness

The GA BoS CoC is committed to continuing the process of ending veteran homelessness. To those ends, the CoC has adopted benchmarks and criteria that will allow the CoC to measure progress toward ending veteran homelessness. (Appendix D)

VAWA Protections

Under the 2013 reauthorization of the Violence Against Women Act (VAWA) the GA BoS CoC is adopting policies to include provisions for protection of victims of domestic violence, dating violence, sexual assault, sexual battery or stalking, regardless of sex, gender identity, gender expression or actual or perceived sexual orientation.

These policies and procedures apply to CoC-funded Rapid Re-Housing (RRH) and PSH programs. ESG-funded programs are subject to VAWA policies issued by the DCA ESG Program Coordinator. (Appendix E)

Point-In-Time (PIT) Count

Per HUD requirements, the GA BoS CoC conducts the unsheltered point-in-time (PIT) count of persons living in homelessness every odd year and the sheltered PIT count every year. HUD requires that all CoCs with federally funded homeless services participate in PIT counts during the last ten days in January each year. This count collects data on where homeless households are sleeping, household size, disability, and chronicity of homelessness. The GA BoS CoC uses survey instruments to collect data on all homeless persons living in emergency shelters, transitional housing, and on the streets on the designated night of the count. (Appendix F)

The CoC, local service organizations, and local governments across the CoC lead the work on the unsheltered homeless count. The local entities collect data on the homeless population in select communities that is then processed to create a model that predicts the rate of homelessness for each of the 152 counties in the BoS CoC. (Appendix G)

Housing Inventory Count (HIC)

Every year the GA BoS CoC will collect data to complete the HUD Housing Inventory Chart (HIC). This inventory will occur at a single point-in-time during the last ten days in January each year on the same date as the point-in-time sheltered and/or unsheltered count.

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

- The number of beds and units currently serving individuals and families
- The number of beds and units created in the past year (“new inventory”)
- The number of beds and units that are fully funded but not yet serving homeless people (“under development”)
- The number of beds and units in HMIS
- The subpopulations served by those beds and units
- The federal funding supporting the beds and units, if applicable.

Housing inventory data must be obtained from all ES, TH, RRH, and PSH programs in the CoC, including those programs that do not receive HUD funding. RRH beds/units are counted if the persons occupying those units are currently housed in their own rental unit. Permanent supportive housing data will be collected only on the beds and units that are dedicated to housing persons who were literally homeless at entry.

To collect Housing Inventory data, the CoC will annually:

- Use HMIS data to complete the Housing Inventory Count OR
- Conduct a housing inventory survey (via mail, fax, e-mail, web-based, phone or on-site communication) of homeless housing providers and instruct providers to update housing inventory information on the specified night of the housing inventory.

AHAR Participation

The Annual Homeless Assessment Report (AHAR) is a report to the U.S. Congress on the extent and nature of homelessness in the United States. It provides counts of people experiencing homelessness and describes their demographic characteristics and service use patterns. The AHAR is based on local data from Point-in-Time (PIT) counts, Housing Inventory Counts (HIC), and Homeless Management Information Systems (HMIS).

The GA BoS Collaborative Applicant is responsible for completing the AHAR. Client-level data for the AHAR will be collected through the HMIS based on HUD’s universal data elements that all communities receiving HUD Homeless Assistance funding are required to collect and maintain and that are the same data elements used to generate HUD’s Annual Performance Reports (APRs).

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

categories established by HUD.

The GA BoS CoC has established continuum-wide data quality control procedures to ensure the accuracy and completeness of AHAR data collected and reported. On an annual basis (according to HUD's designated data collection schedule, October 1 - September 30), the CoC will run the required reports in HMIS to submit the AHAR data report.

HMIS

The HMIS is a computerized data collection application designed to capture information about homeless persons and homeless service programs over time. The U.S. Department of Housing and Urban Development (HUD) under the HEARTH Act mandates HMIS for all communities and agencies receiving HUD Continuum of Care and Emergency Solutions Grants homeless assistance funds. Other Federal Partners, such as the U.S. Department of Health and Human Services and the U.S. Department of Veteran Affairs, also mandate the use of HMIS for some of their programs. HMIS is essential to streamline client services and inform public policy. Through HMIS, homeless persons benefit from improved coordination within and between agencies, informed advocacy efforts, and policies that result in targeted services. Analysis of information gathered through HMIS is critical to the preparation of a periodic accounting of homelessness in Georgia, which may include measuring the extent and nature of homelessness, the utilization of services and homeless programs over time and the effectiveness of homeless service programs. Such an unduplicated accounting of homelessness is necessary to service and systems planning, effective resource allocation and advocacy.

In response to the need for a more effective HMIS implementation, eight Continua of Care across the State of Georgia (Atlanta, Athens-Clarke County, Augusta – Richmond County, DeKalb County, Fulton County, Marietta – Cobb County, Savannah-Chatham County and the GA BoS) joined together in 2015 to form the GA HMIS Collaborative in pursuit of a statewide GA HMIS Implementation with the Georgia Department of Community Affairs (DCA), on behalf of the Georgia Housing and Finance Authority (GHFA), serving as the HMIS Lead. The GA HMIS Collaborative established a governing body, the GA HMIS Steering Committee, to aid in directing planning and policy decisions in support of the GA HMIS Implementation operation of HMIS for the communities involved.

The CoC's purpose and goal is to create a system of coordination to meet the CoC's needs of homeless persons that includes outreach, engagement, and assessment, shelter, housing, and supportive services; and homelessness prevention strategies. HMIS will enable homeless service providers to collect the HUD universal data elements required. It also allows for the analysis of critical data in HMIS to calculate the magnitude, characteristics, and needs of the homeless population and is necessary for service and systems planning.

Detailed information on HMIS can be found in the GA BoS CoC HMIS Policies and Procedures. (Appendix H)

CoC Meetings

1. CoC General Meetings are scheduled to be held biannually in the Forsyth-Macon area in or near the geographical center of the state and will be available by webinar.
2. In addition to continuum-wide meeting efforts, the Continuum will work to understand and address homelessness through locally- and regionally-driven, collaborative processes that include regional meetings.
3. All the meetings of the members of the CoC shall be open to the public. Meetings other than member meetings, including meetings of the GA BoS CoC Board are open to the public.
4. The GA BoS CoC Board may call special member meetings, if necessary.
5. GA BoS CoC staff shall take reasonable steps to ensure that all members are notified of the time and place of all member meetings.
6. A reasonable period shall be set aside for members to address the CoC at the member meetings.

HUD CoC Program and ESG Program Funding

Continuum of Care Program Application in response to HUD NOFA

The GA BoS Collaborative Applicant is responsible for facilitating the community response to the annual Continuum of Care (CoC) Program Notice of Funding Availability (NOFA) issued by the U.S. Department of Housing and Urban Development (HUD).

Project Review, Score and Ranking Policies and Re-Allocation Process

The GA BoS Competition is a two-step process. The Review Application and supplemental materials are submitted to CoC for project scoring and ranking and the HUD Application submitted in E-SNAPS. The Review Applications are sent to the review sub-committees and scored in accordance of policy set by the CoC Board at a special meeting set at the beginning for the Competition period. The scores are collected from review team members, performance data is collected from annual reports, and applicants are given the opportunity to review their project scores. The results of the competition, project ranking, and recommended reallocations are reviewed with the Standards, Rating, and Project Selection Committee who approved and make recommendations to the Board. The Board reviews the results of the competition and approves the results of the competition, final ranking and determinations, and recommended reallocations. Applications not scoring high enough will not be included in the Consolidated Application. (Appendix I)

Annual Performance Report

Annual Performance Reports (APRs) are required by HUD on an annual basis to track the progress and accomplishments of HUD's Continuum of Care Program. The APR gathers information on how programs assist homeless persons to obtain and remain in permanent housing and increase income. This information is used by HUD and Congress to assess outcomes from federal funding. The APR is also useful to the CoC, grantees, and sponsors as a planning and management tool to analyze client demographics and service needs; to evaluate project outcomes; to make improvements; and to set future goals for their projects. The GA BoS CoC will conduct quarterly monitoring reviews of APRs. Staff may conduct on-site monitoring or provide technical assistance when there are specific concerns about projects' performance or ability to effectively manage a CoC Program-funded project.

Staff may conduct desk-monitoring reviews of agency audits, drawdown requests, APRs and other documentation at any time or as necessary for the prioritization process and response to the HUD CoC Program NOFA.

Policy on HUD Monitoring of CoC Program-funded Projects

CoC Program-funded projects will inform the CoC about the occurrence and status of HUD monitoring visits, reports, results, and resolutions. (Appendix J)

ESG Recipient Monitoring

The GA BoS CoC will work with the State ESG recipient, the Georgia Department Community Affairs (DCA), and city/county ESG recipients to coordinate the monitoring of outcomes of ESG funding. State ESG Grantee activities will be monitored to assure compliance with applicable Federal requirements and to determine whether performance goals are being achieved. The CoC works with the city/county ESG jurisdictions to review the System Performance Measures for their funded projects to ensure performance goals are being met. The CoC is in the process of further developing formalized ESG recipient evaluation.

Policy on Late Submission of Project Applications for CoC Program Funding

Project Applicants in the GA BoS CoC shall adhere to all due dates and deadlines related to the GA BoS CoC's application process, also known as the local competition, for HUD CoC Program funds. If a Project Application is not submitted by the due date and time, the GA BoS CoC Board will determine potential consequences. (Appendix K)

Ranking the CES and HMIS Project Applications in the Priority Listing

The GA BoS CoC's CES and HMIS Projects will be ranked mid-Tier 1, as it is an essential to the effective operation of the CoC. (Appendix L)

Administering CoC Program- and ESG Program-funded Assistance

Written Standards

The GA BoS CoC has developed written standards to be reviewed and jointly finalized with ESG recipients. (See the GA BoS CoC Written Standards.) This document sets standards for projects surrounding how participants are selected, how housing barrier assessments are conducted, and how assistance is provided. This document applies to all CoC and ESG Program- funded projects operating in the GA BoS CoC geography. (Appendix M)

Prioritization of Persons Experiencing Chronic Homelessness in PSH

Recognizing the need for strategic allocation of permanent supportive housing (PSH) beds, the GA BoS CoC has adopted the guidance provided by HUD in Notice CPD 14-012 for prioritizing those who enter into CoC Program-funded PSH projects. (Appendix N)

Requiring PSH Projects to Use Housing First or Low-Barrier Approaches

The GA BoS CoC will require all Permanent Housing (PH) projects within the CoC to shift their program models to Housing First, low barrier model as of the HUD FY 2016 Continuum of Care (CoC) Program competition. (Appendix O)

CoC Governance

Governance Charter

Most GA BoS CoC Board information is included in the CoC's Governance Charter. The Charter will be updated by the Membership and Rules Committee and approved not less than annually by a majority vote of a quorum of the Board. For substantial updates to this Charter, as determined by this Committee, a majority vote of Continuum membership must be obtained. (Appendix P)

APPENDICES

Appendix A

Coordinated Entry (CE) Written Standards, Policies and Procedures

Appendix B

Prohibition against Involuntary Family Separation

Appendix C

BoS Education Policy

Appendix D

CoC-Wide Definition for Ending Veteran Homelessness

Adoption of CoC-Wide Definition for Ending Veteran Homelessness

PREFACE

In an effort to end Veteran homelessness in the Georgia Balance of State Continuum of Care (GA BoS CoC), the GA BoS CoC will establish a CoC-wide definition of an effective end to Veteran homelessness.

DEFINITION

An end to Veteran homelessness means that the community will have a systematic response in place that ensures homelessness among Veterans is prevented whenever possible or is otherwise a rare, brief, and non-recurring experience.

Specifically, the community will have the capacity to:

- Quickly identify and engage Veterans at-risk of and experiencing homelessness.
- Intervene to prevent the loss of housing and divert Veterans from entering the homeless service system.
- Provide immediate access to shelter and crisis services, without barriers to entry, while permanent stable housing and appropriate supports are being secured.
- When homelessness does occur, quickly connect Veterans to housing assistance and services—tailored to their unique needs and strengths—to help them achieve and maintain stable housing when homelessness does occur.

To measure progress toward this goal, the Georgia Balance of State CoC will employ the United States Interagency Council on Homelessness (USICH) Criteria and Benchmarks.

USICH CRITERIA

- 1) The community has identified all Veterans experiencing homelessness
- 2) The community provides shelter immediately to any Veteran experiencing unsheltered homelessness who wants it
- 3) The community provides service-intensive transitional housing only in limited instances
- 4) The community has capacity to assist Veterans to swiftly move into permanent housing
- 5) The community has resources, plans, and system capacity in place should any Veteran become homeless or be at risk of homelessness in the future

USICH BENCHMARKS

- A) Chronic homelessness among Veterans has been ended
- B) Veterans have quick access to permanent housing
- C) The community has sufficient permanent housing capacity
- D) The community is committed to Housing First and provides service-intensive

transitional housing to Veterans experiencing homelessness only in limited instances

The GA BoS CoC will be working with members of the CoC to improve systems level operations and measurement to support communities in achieving an end to Veteran homelessness.

RESOURCES

To view the USICH Criteria and Benchmarks in their entirety, visit

https://www.usich.gov/resources/uploads/asset_library/Achieving_the_Goal_Ending_Veteran_Homelessness_v3_10_01_15.pdf

Appendix E

Violence Against Women Act (VAWA) Policies and Procedures

Appendix F
Point-in-time Survey

Appendix G

PIT Model

Appendix H

HMIS Policies and Standard Operating Procedures

Appendix I

Project Review, Score and Ranking Policies and Re-Allocation Process

Appendix J

Policy on HUD Monitoring of CoC Program-funded Projects

HUD Monitoring of CoC Program-funded Projects

Policy:

Projects in the GA BoS CoC that are funded by the U.S. Department of Housing and Urban Development's (HUD's) Continuum of Care (CoC) Program are required to notify the Collaborative Applicant (CA) during the Annual Competition of any HUD monitoring of the project.

Projects will ensure that the CA receives the monitoring results and a final letter from HUD stating that all findings, if any, have been closed.

Results of HUD monitoring could affect projects' scoring in the CoC's competition for CoC Program funding.

Failure to comply with this requirement could affect projects' scoring in the CoC's competition for CoC Program funding.

Appendix K

Policy on Late Submission of Project Applications

CoC Program Application Process/Local Competition Late Submission of Project Applications

Policy:

Project Applicants shall adhere to all due dates and deadlines related to the GA BoS CoC's application process, also known as the local competition, for HUD Continuum of Care (CoC) Program funding. Project Applications must be submitted by the due date and time.

If a Project Application is not submitted by the due date and time, the GA BoS CoC will determine potential consequences, including but not limited to ranking, whether the project is ineligible for inclusion in the final GA BoS CoC's Consolidated Application or will receive reduced funding.

Appendix L

Ranking the CES and HMIS Project Applications in the Priority Listing

Ranking the CES and HMIS Project Applications in the Priority Listing

The BoS CoC is required by CoC regulations to operate a HMIS, establish a “centralized or coordinated assessment system,” and carry out planning activities in accordance with the Interim regulations. The renewal projects for centralized or coordinated assessment and HMIS will therefore be prioritized in the top tier of the ranking.

Appendix M

Georgia Balance of State Continuum of Care Written Standards

Appendix N

Adoption of Notice CPD 16-011

Adoption of CPD-16-011: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing

Approved by the GA BoS CoC Board 5/24/2017

The GA BoS CoC will require all HUD Continuum of Care Program-funded Permanent Supportive Housing (PSH) projects within the CoC to follow CPD-16-011: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing upon approval of the Written Standards.

Appendix O

Requiring PH Projects to Use Housing First or Low-Barrier Approaches

Appendix P

BoS CoC Governance Charter