



City of Lowell: Partnership for Change to End Homelessness

Lowell Continuum of Care ~ MA-508

CoC Program: Governance Charter

SECTION 1: PURPOSE & GOALS

The purpose of the Lowell CoC is to promote communitywide commitment to the goal of ending homelessness; attain and provide funding for efforts by nonprofit providers, in cooperation with Federal, State and local governments and private funders, to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effective utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness. In addition the Lowell CoC is committed to avoiding duplication of efforts, leveraging resources, coordinating entry and assessments, and comprehensive planning.

Lowell's CCAB/Steering Committee is responsible for the coordination of policies, strategies and activities toward ending homelessness. The CCAB/Steering Committee gathers and analyzes information in order to determine the local needs of people experiencing homelessness, implements strategic responses, educates and engages the community on issues of homeless, provides advice and input on the operations of homeless housing and services programs, and measures CoC performance.

The Lowell CoC will focus on the following HUD goals: Creating a systemic response to homelessness strategically allocating resources, ending chronic homelessness, ending family homelessness, ending youth homelessness, ending veteran homelessness, using a Housing First and low barrier approach.

SECTION 2: RESPONSIBILITIES

The interim rule establishes three major duties for which the Continuum of Care is responsible: to operate the Continuum of Care, to designate an HMIS for the Continuum of Care, and to plan for the Continuum of Care.

A. COC PROGRAM OPERATING STANDARDS

1. **Housing First Approach:** The CoC has adopted a Housing First approach that centers on providing homeless people with housing as quickly as possible and then providing services as needed using a low barrier approach that emphasizes community integration, stable tenancy, recovery and individual choice.
2. **Low Barrier Approach to Entry:** The CoC will offer Lowell's most vulnerable individuals and families experiencing homelessness immediate access to all available permanent supportive housing without unnecessary prerequisites including:
3. Admission/tenant screening and selection practice that do not require abstinence from substances, completion of or compliance with treatment, or participation in services.
 - a. Not rejecting applicants on the basis of poor or lack of credit or income, poor or lack of rental history, minor criminal convictions, or other factors that might indicate a lack of "housing readiness."
 - b. The use of blanket exclusionary criteria based on more serious criminal convictions. However, programs may consider such convictions on a case by case basis as necessary to ensure the safety of other residents and staff.
 - c. Applying only those admission criteria that are required by funders. However, programs may also consider additional criteria on a case by case basis as necessary to ensure the safety of tenants and staff. Application of such additional criteria should be rare, and may include, for example, denial of an applicant who is a high risk registered sex offender by a project serving children, or denial of an applicant who has a history of domestic violence involving a current participant.

4. **CoC Order of Priority Policy:** The CoC have adopted the following excerpts from HUD Notice CPD-14-012: *Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons: Order of Priority in CoC Program-funded PSH Beds Dedicated to Persons Experiencing Chronic Homelessness and PSH Beds Prioritized for Occupancy by Persons Experiencing Chronic Homelessness (HUD Notice)*.
- a. First Priority-Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs
 - i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; AND
 - ii. Has severe service needs (see Section 1.0.3. of this Notice for definition of severe service needs).
 - b. Second Priority-Chronically Homeless Individuals and Families with the Longest History of Homelessness.
 - i. The CH individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; AND
 - ii. Does not have severe service needs.
 - c. Third Priority-Chronically Homeless Individuals and Families with the Most Severe Service Needs.
 - i. The CH individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than one year; AND
 - ii. Has severe service needs.
 - d. Fourth Priority-All Other Chronically Homeless Individuals and Families.
 - i. The CH individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length the four occasions is less than 12 months; AND
 - ii. Does not have severe service needs.
5. **Severity of Service Needs:** According to the HUD Notice, an individual who has the most severe service needs is one for whom at least one of the following is true:
- i. History of high utilization of crisis services, including but not limited to, ER's, jails, & psychiatric facilities; OR
 - ii. Significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing.
 - iii. Severe service needs as defined in paragraphs i. and ii. above should be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool that can identify the severity of needs such as the Vulnerability Index (VI), the Service Prioritization Decision Assistance Tool (SPDAT), or the Frequent Users Service Enhancement (FUSE). The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual.
 - iv. In states where there is an alternate criteria used by state Medicaid departments to identify high-need, high cost beneficiaries, CoCs may use similar criteria to determine if a household has severe service needs instead of the criteria defined paragraphs i. and ii. above. However, such determination must not be based on a specific diagnosis or disability type.

B. COC OPERATIONS/GOVERNANCE

The responsibilities for operating the Lowell CoC are divided between the CCAB/Steering Committee, and the CoC Collaborative Applicant and HMIS lead as described below.

1. Lowell's Continuum of Care Advisory Board (CCAB/Steering Committee):

a. Responsibilities include, but may not be limited to:

- i. CoC Governance Charter and By-Laws annual updates to include all procedures and policies needed to comply with HUD and with HMIS requirements, including a code of conduct and recusal process for the Lowell CCAB/Steering Committee, its chairs, and any person acting on behalf of the CCAB/Steering Committee.
- ii. Establish CoC Subcommittees and Workgroups
- iii. Coordinate with CoC members and others to:
 1. Engage the community on issues of hunger and homelessness
 2. Provide forums on a variety of subjects designed to establish a pathway to ending all forms of homelessness
 3. Engage/encourage non-CoC funded projects to adopt CoC Program standards and goals; and HMIS data and reporting standards.
- iv. Design and implement a Coordinated Entry System: In consultation with recipients of ESG funds, the CoC works with: the Massachusetts Departments of Housing and Community Development, Transitional Assistance, Mental Health, Social Services, Youth Services, Elder Affairs, and Public Health; and the Merrimack Valley Coalition to End Homelessness, Massachusetts Housing and Shelter Alliance, U.S. Department of Veterans Affairs and many others to operate a CES that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services and provides the most appropriate and cost effective response. (In process)
- v. Coordinate with Collaborative Applicant (CA), subrecipients and stakeholders to establish performance benchmarks and targets appropriate for population and program type.
- vi. Monitor CA performance evaluations of CoC and ESG recipients and subrecipients
- vii. Evaluates the outcomes of projects funded under ESG and CoC programs.
- viii. Consults with State and local government, ESG and CoC subrecipients on the plans to allocate ESG funds
- ix. Report and evaluate the performance of ESG Subrecipients
- x. Partners to complete the jurisdictions' Consolidated Plan
- xi. Mainstream resource oversight. Coordinates with CA to review mainstream resources performance outcomes from CoC-funded projects. Provide or arrange for technical assistance and training, including SOAR training, for agencies struggling to meet CoC standards
- xii. Discharge Planning: Coordinate with the CA and representatives from federal and state agencies on discharge planning compliance.
- xiii. Take action to assist ESG and CoC projects that perform poorly, and if necessary reevaluate their capacity to meet CoC Program requirements for funding.
- xiv. Coordinate with CA to analyze and assess the results of annual gaps and needs assessments and the reports the outcomes of ESG and CoC projects to HUD annually.

b. CCAB/Steering Committee Membership and Leadership: Membership may be comprised of all individuals and agencies concerned with the development and coordination of homeless assistance programs. Membership may include but not be limited to:

- i. Homeless or formerly homeless individuals and families
- ii. Non--profit organizations representing veterans and individuals with disabilities
- iii. Victim service providers
- iv. Faith--based organizations
- v. Public housing agencies
- vi. Advocates
- vii. Mental health and developmental health agencies
- viii. School districts
- ix. Hospitals
- x. Universities
- xi. Affordable housing developers
- xii. Law enforcement
- xiii. Representatives of business and financial institutions
- xiv. Representatives of private foundations and funding organizations
- xv. Social service providers

- xvi. State and local government agencies
- xvii. Veterans housing and services organizations and agencies
- xviii. Youth housing and services agencies and organizations

c. **CCAB/Steering Committee Member Qualifications:** All members of the Lowell CCAB/Steering Committee shall demonstrate a professional interest in, or personal commitment to, addressing and alleviating the impacts of homelessness on the people of the community. Membership shall be comprised of individuals and agencies, from the community and the agencies listed above, that are concerned with the development and coordination of homeless assistance programs, through a nominating process initiated by the Co-Chairs at least annually.

d. **Rights of CCAB/Steering Committee Members:** Members are entitled to:

- i. Have voting rights (One vote per agency or individual member).
- ii. Receive letters of support for grants indicating length of membership and level of participation.
- iii. Receive information and updates via e-mail.

e. **Expectation of CCAB/Steering Committee Members**

- i. Members are expected to be present and active participants in CoC Committee meetings.
- ii. Members are expected to actively participate in Lowell CoC Committee activities, correspondence, sub-committees, and/or ad-hoc committees.
- iii. Members are expected to following the By-Laws and Lowell CoC Code of Conduct.

f. **CCAB/Steering Committee Voting**

- i. The Lowell CCAB/Steering Committee operates by consensus whenever possible.
- ii. When a vote is necessary, each member shall have one vote upon any motion.
- iii. No member shall vote on any issue where there could be a conflict of interest. (See Conflict of Interest)
- iv. As needed, Roberts Rules of Order will govern procedural questions during CCAB/Steering Committee Meetings.
- v. A simple majority vote of members present will be used to settle issues that reach an impasse.

g. **CCAB/Steering Committee Meetings/Attendance**

- i. The CCAB/Steering Committee shall meet a minimum of six (6) times per year.
- ii. Upon a request, in writing, by at least five members of the Board, a special meeting can be called by the Co-Chairs at any time.
- iii. Attendance will be recorded at all Steering and committee meetings. Members are expected to have at least an 80% attendance rate at all Continuum meetings.
- iv. A member can be removed by a majority vote of the CCAB/Steering Committee

h. **Quorum at CCAB/Steering Committee Meetings**

- i. A simple majority (50% + 1) of Members, at a CCAB/Steering Committee meeting, constitutes a quorum.
- ii. A quorum is needed to (a) change Lowell CoC bylaws and (b) approve CCAB/Steering Committee members.

i. **CCAB/Steering Committee Co-Chairs**

- i. The officers of the Lowell CCAB shall be two co-chairs, one representing DPD and one representing the non-profit provider community.
- ii. Selection of the Co-Chairs will take place annually.
- iii. The Co-Chairs will serve a two-year term and can serve unlimited consecutive terms.
- iv. Election of the Co-Chair will be by simple majority vote of Members present (Quorum required) at the May CoC meeting.
- v. The Co-Chairs are authorized to represent the Lowell CoC in all matters not requiring a quorum.
- vi. The Co-Chairs shall call, preside over all meetings, and set agendas for all CoC meetings. The Co-Chairs can call special meetings of the Continuum.
- vii. Immediate Past Co-Chairs may assist and advise the Co-Chairs, upon their request, in the performance of their duties.
- viii. Any vacancies occurring during the year shall be filled upon the recommendation of the Executive Committee (described below) and shall be ratified by the CCAB/Steering Committee.

j. **CCAB/Steering Committee Member Terms**

- i. For those members who represent a government department or organization, that person may serve as long as they continue to hold the same job/position.
- ii. For those members who represent a segment of the population or a named organization, the term of office is two

- years. These members may serve up to three consecutive terms.
- iii. A member may be reelected to the Steering Committee after a period of twelve (12) months of non-service.
- iv. A term year is a calendar year, January through December.
- v. Members that fail to attend regularly scheduled meetings shall be subject to removal from the
- vi. Steering Committee by vote of the Committee if they attend less than 75% of meetings. The event of the removal of a member of the Steering Committee.

k. **Compensation of Members:** Steering Committee members will receive no compensation for their duties.

2. CoC Committees, Subcommittees and Workgroups

The CoC is comprised of several volunteer subcommittees and working groups that have various roles and responsibilities. Subcommittees/workgroups include, but may not be limited to:

- a. **Executive Committee (EC)** serves as the administrative arm of the Lowell CoC. The EC provides planning assistance and oversight for the CoC, ensures the cooperation of members, preparation of reports, evaluation of systems and the development of necessary procedures to implement policies ratified by the CoC. The Executive Committee will review the annual HUD CoC Program application, Coordinated Entry System development and implementation and assist with identifying and securing additional funding sources for CoC programs
- b. **HMIS/Coordinated Entry System Subcommittee (H-CES)** develops and plans for the implementation and management of the Coordinated Entry system; annual updates to the CoC's *HMIS Policies and Procedures Manual*; and oversees HMIS compliance and participation. The H-CES coordinates with the CCAB/Steering Committee and CA on the preparation, training and participation in the annual Point-In-Time and Housing Inventory Counts; and for submission of the Annual Homeless Assessment and Performance Reports. The H-CES is responsible for coordinating HMIS training and support opportunities for providers to ensure accurate, timely and useful data analysis reports.
- c. **Evaluation and Scoring Committee (ESC)** will evaluate and score proposals submitted for new HUD funding according to funding priorities and other guidelines and/or plans of the CoC. The Evaluation (Scoring) Committee will be comprised of individuals who do not have a conflict of interest due to funding or requests for funding. The ESC will follow the Grievance and Appeals Policy outlined below for any appeals of its decisions.
- d. **Veterans Subcommittee (VS)** is responsible for the implementation of the CoC's *Partnership for Change to End Veterans' Homelessness Plan* and oversight of Lowell's SSVF Intermediary; certification of Lowell's claim to the Mayors Challenge of having ended Veterans' homelessness per initiative criteria; and ongoing oversight of the VS's Veterans Registry of project efforts and outcomes related to Veterans health, housing placements and long-term stability.

3. Collaborative Applicant/Lead Agency Responsibilities

- a. Grants management and oversight
- b. Staff CoC Subcommittees
- c. Manage HMIS/Coordinated Entry System Program Manager
- d. Coordinate annual needs/gaps assessment
- e. Secure approvals to accept and expend the CoC Program grant funds within the City
- f. Preparation, review and submission of CoC Program Competition application
- g. Subrecipient contract management
- h. Performance evaluation and financial compliance monitoring
- i. Processing reimbursement invoices and documenting match
- j. Coordinate resources, integrate activities and facilitate collaboration for all CoC efforts that include, but may not be limited to:
 - i. Housing placement and development initiatives,
 - ii. Homeless prevention,
 - iii. Ending Homelessness Initiatives,
 - 1. Veterans Homelessness
 - 2. Chronic Homelessness
 - 3. Family Homeless
 - 4. Youth Homelessness
 - iv. Point-In-Time and Housing Inventory Counts,
 - v. Public Forums and conferences,

- vi. Provider and Stakeholder Surveys,
- vii. Technical assistance and training,
- viii. HMIS and Coordinated Entry System,
- ix. Veteran’s Intermediary and HOT LINE

4. Designating and Operating an HMIS

The Lowell CCAB/Steering Committee and Collaborative Applicant is responsible for the following activities:

- a. Designates a single HMIS for the CoC and currently that HMIS is the MA-HMIS. The City of Lowell's Department of Planning and Development (DPD) as the CoC's Collaborative Applicant also currently serves as the CoC's HMIS lead agency.
- b. The Lowell CoC HMIS Lead/DPD is responsible for the following activities:
 - i. Works with the HMIS subcommittee to review, revise and approve a CoC HMIS data privacy plan, data security plan, and data quality plan.
 - ii. Ensures that the HMIS is administered in compliance with HUD requirements.
- c. The Lowell CoC HMIS Lead/DPD and CCAB/Steering Committee are responsible for the following activities:
 - i. Ensure consistent participation by CoC and ESG recipients and subrecipients in the MA-HMIS

5. Collaborative Applicant: HMIS/Coordinated Entry System Project Manager (H-CEP): For the FY2016 CoC Program competition, the CCAB/Steering Committee and CA have reallocated funding to support a H-CEP and will work together to

- a. Develop and manage a Coordinated Entry System that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services and helps direct those persons to the appropriate providers
- b. Work with Community Development Specialist (CDS) and Continuum of Care Advisory Board to develop new or revise existing strategic plan for using HMIS to reduce long-term homelessness and developing data driven solutions
- c. Work with Senior Program Manager (or appropriate ESG subrecipient) improve integration of ESG and CoC funded programs in HMIS to inform strategic plan systems development policies, procedures and funding decisions
- d. Work with CoC and ESG project managers to outreach to all CoC and ESG HMIS and non-HMIS participants to further strategic goals, develop and implement a work plan for using HMIS data to improve the delivery of homeless assistance
- e. Increase the use of HMIS of homeless programs not receiving federal funds
- f. Work with CDS and the CCAB/Steering Committee to develop data driven tactical plans serving the implementation of Lowell’s proposed Centralized Access System (CAS) Initiative to and develop evaluation tools for the coordinated entry and assessment within the jurisdiction
- g. Work with CDS and CCAB/Steering Committee to develop and implement a work plan for to improve outcomes of HUD funded homeless assistance programs
- h. Chair the CoC’s HMIS Subcommittee
- i. Manage CoC’s participation in MA-HMIS
- j. Monitor Subrecipient data quality and informing the CDS, ESG Senior Program Manager and Director of Community Development of problems with data quality
- k. Produce HMIS data for CoC Program Application, Annual Performance Reports, Point-in-Time Count, Annual Homeless Assistant Report, and CDBG/ESG annual report
- l. Promote collaboration among providers
- m. Honor client choice re: geography and services needed
- n. Incorporate provider choice in enrollment decisions
- o. Establish standard, consistent eligibility criteria and priorities for the system
- p. Ensure that eligibility requirements are limited to only those required by funding sources (and no additional requirements that are not required by funders) in order to accommodate as many people as possible
- q. Ensure that quality housing and services are provided
- r. Ensure clear and easy access to the system for consumers
- s. Improve efficiency, communication, and knowledge of resources throughout the system
- t. To ensure that decisions are cost effective and focused on solutions to homelessness
- u. To employ a systemic “Rapid Exit to Housing” approach
- v. To streamlines processing of housing referrals, transfers and placements
- w. To ensure accountability in the system through transparency and consistency of effort
- x. Leverage MA-HMIS and the use of “real time” data whenever possible
- y. Prioritizes enrollment based on need and vulnerability

6. Grievances

- a. ***The purpose*** of the Lowell CoC Grievance Policy is to ensure that there is a fair and accessible process for providers and CCAB/Steering Committee members to file a grievance with the CoC. For example, a provider might have a grievance with how their renewal evaluation results are scored or rejection of a project application for funding.
- b. ***Composition of Grievance Committee***: The Grievance Committee shall be made up of a minimum of three members of the CCAB/Steering Committee. Members shall be appointed by the CCAB/Steering Committee Co-Chairs.
- c. ***Filing a Grievance***: Grievances shall be submitted in writing to the Grievance Committee via e-mail (csamaras@lowellma.gov).
- d. ***Resolution of a Grievance***: Written grievances will be reviewed within 30 days of receipt. The committee will issue a written decision that specifies the resolution of the grievance and any actions that need to be taken. The decision may be appealed to the CCAB/Steering Committee Co-Chairs within 10 days of the written decision. The decision of the Co-Chairs is final. In all instances when a conflict of interest is present, parties shall recuse themselves from voting on and otherwise influencing the outcome of matters referred to the Grievance Committee.