

Columbus & Franklin County Continuum of Care Governance and Policy Statements

Overview

Continuum of Care Structure under the HEARTH Act

The Continuum of Care (CoC) 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 re-housing; 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. The Continuum is responsible for coordinating and implementing a system for its geographic area to meet the needs of the homeless population and subpopulations within the geographic area.

The CoC primary responsibilities under the HEARTH Act include the following:

- < Operating the CoC
- < Designating and operating an HMIS
- < CoC planning

In Columbus and Franklin County the CoC role and responsibilities is fulfilled by a committee called the Rebuilding Lives Funder Collaborative (RLFC). The RLFC provides stewardship for all the strategies developed under the Rebuilding Lives (RL) Plan and provides funding for the capital, services and operations of supportive housing in Columbus & Franklin County, coordinates activities for the new plan, promotes collaboration to achieve goals and strategies, and secures resources for programs and projects. For purposes of clarity, RLFC will be used when referring to CoC activities.

The policy statements below govern the work of the RLFC. The policies are organized into different areas. The RLFC will meet annually to review and approve its annual plan and policies.

The categories are:

- < Structure
- < HUD Mandated Activities
- < RL Plan Activities
- < Community Shelter Board Activities
- < Homeless or Formerly Homeless Citizens Activities
- < Provider Activities

< Other Activities

Structure

1. Membership

The RLFC membership will comport with HUD requirements as listed below. The RLFC will annually review and approve its membership, inclusive of new members.

An RLFC Board will be formed with representatives of the RLFC that will meet regularly and is given authority by the RLFC to make decisions on its behalf.

A total of 38 members shall be annually approved for participation. The RLFC Board will recommend annually members for participation on the RLFC and rotation of members will be considered if and when appropriate, using the table below. Regular attendance is expected by the RLFC representative or their delegate, as long as the delegate holds decision making authority. If a delegate is needed for a meeting, the official member must inform Community Shelter Board (CSB) as soon as possible ahead of the meeting so that CSB can assure there are no conflicts of interest. CSB's Executive Director shall chair the RLFC and the RLFC Board.

RLFC Structure	Organizational Representative
Non-profit homeless providers <i>(rotating provider consideration)</i>	Community Shelter Board YMCA
Youth provider/advocate <i>(rotating provider consideration)</i>	Huckleberry House
Victim service providers <i>(rotating provider consideration)</i>	The Center for Family Safety and Healing
Faith-based organizations <i>(rotating consideration)</i>	Stowe Mission of Central Ohio
Governments	City of Columbus Columbus Mayor's Office Columbus City Council Franklin County
Businesses <i>(rotating consideration)</i>	The Columbus Foundation Capital Crossroads and Discovery SID CSB Board Member CSB Board Member CSB Board Member
Advocates	Columbus Coalition for the Homeless Corporation for Supportive Housing Legal Aid Society of Columbus Human trafficking organization

Public Housing Agencies	Columbus Metropolitan Housing Authority
School districts	Columbus City Schools – Project Connect
Social Service Providers (rotating consideration)	Goodwill Franklin County Children Services Franklin County Dept of Job and Family Services Franklin County Office on Aging Franklin County Board of Developmental Disabilities United Way of Central Ohio
Mental Health Agencies	ADAMH Board Twin Valley Behavioral Healthcare
Hospitals (rotating provider consideration)	OhioHealth
Universities (rotating provider consideration)	Columbus State Community College
Affordable Housing Developers	Affordable Housing Trust Corporation Ohio Capital Corporation for Housing
Law Enforcement	Columbus Police Department Franklin County Jail
Organizations that serve homeless and formerly homeless veterans	Veterans Administration Veterans Service Commission
Homeless and formerly homeless persons (rotating consideration)	Citizens Advisory Council (CAC) Citizens Advisory Council (CAC)

The RLFC is expected to meet in May, August, and November of each year, in open meetings.

CSB staff shall give notice of each meeting of the RLFC, to each member of the RLFC, by mailing or emailing the same to each member at least seven (7) days prior to the holding of such meeting and posting the meeting agenda on CSB’s website.

CSB provides staff support for the RLFC.

RLFC Responsibilities

Operations of the CoC

- < Adopt and follow a written process to select the RLFC Board (The process must be reviewed, updated and approved at least once every 5 years.)
- < Appoint members to the RLFC Board every two years
- < Renew authority of the RLFC Board
- < Review and approve annual membership inclusive of new members
- < Review and approve the Annual Plan and the RLFC Governance and Policy Statements.

- < Appoint additional committees, subcommittees or work groups
- < Review, as needed, decisions made by the RLFC Board, inclusive of:
 - o Performance targets
 - o Provider performance and outcomes of ESG and CoC funded programs
 - o Actions against poor performers
- < Establish and operate a coordinated assessment system for homeless individuals and families (delegated to CSB)
- < Establish and consistently follow written standards for the provision of ESG and CoC assistance (delegated to CSB)

CoC Planning

- < Receive community and public policy updates relevant to homelessness issues
- < Receive updates on the Rebuilding Lives Plan, the local plan to end homelessness
- < Plan and conduct a sheltered and unsheltered point-in-time count of homeless persons (delegated to CSB)
- < Conduct an annual gaps analyses of the homeless needs and services (delegated to CSB)
- < Provide required information to complete the local Consolidate Plan(s) (delegated to CSB)
- < Review and act on the annual funding allocations, inclusive of ESG and CoC funds and establish funding priorities (delegated to RLFC Board)
- < Review and act on the HUD CoC Application including all relevant charts and tables
- < Review and act on any programs that should be removed from HUD funding and any proposed funding reallocations
- < Review and make final determination on provider appeals, if provider is not in agreement with the RLFC Board determination
- < Review and act annually on the proposed new supportive housing bonus project
- < Designate a Collaborative Applicant
- < Review and act on any other RLFC Board recommendations

HMIS Operations (delegated to the RLFC Board)

- < Designate a single HMIS for the CoC
- < Designate an HMIS Lead
- < Ensure consistent participation in HMIS (delegated to CSB)
- < Ensure the HMIS compliance with HUD requirements (delegated to CSB)
- < Review and approve the HMIS policies and procedures, privacy plan, security plan and data quality plan (delegated to CSB)

Decision Making

Quorum: A majority of the RLFC members shall constitute a quorum at all meetings thereof. The meeting will be adjourned if no quorum is present and no voting will occur in such case.

Robert's Rules of Order will be followed and a simple majority voting is necessary for any resolution of the committee to be passed.

2. RLFC Board

The RLFC Board is formed with representatives of the RLFC. The group meets regularly and is given authority by the RLFC to make decisions on its behalf.

The RLFC Board will be the RLFC's Executive Committee, comprised of the following representatives:

Organizational Representative
1. City of Columbus
2. Franklin County
3. Citizens Advisory Council (homeless or formerly homeless representative)
4. ADAMH
5. CMHA
6. UWCO
7. The Columbus Foundation
8. The Columbus Coalition for the Homeless
9. Affordable Housing Trust Corporation
10. CSB Board Member
11. CSB Executive Director, Chair

Regular attendance is expected by the RLFC Board representative or their delegate, as long as the delegate holds decision making authority. If a delegate is needed for a meeting, the official member must inform CSB as soon as possible ahead of the meeting so that CSB can assure there are no conflicts of interest.

The RLFC Board is expected to meet in April, August, and November of each year. CSB may, from time to time, request the RLFC Board to meet more frequently to meet HUD requirements.

CSB staff shall give notice of each meeting of the RLFC Board, to each member of the RLFC Board, by mailing or emailing the same to each member at least seven (7) days prior to the holding of such meeting.

CSB provides staff support for the RLFC Board.

RLFC Board Responsibilities

Operations of the CoC

- < Review and recommend annual membership to the RLFC
- < Review and recommend bi-annually membership to the RLFC Board
- < Review and recommend to the RLFC the Annual Plan and the RLFC Governance and Policy Statements

CoC Planning

- < Receive community and public policy updates relevant to homelessness issues
- < Receive updates on the Rebuilding Lives Plan and take actions that will move the plan forward
- < Provide feedback and information, as needed, to the local government (City/County) on their Consolidated Plan
- < Review and act on the annual funding allocations, inclusive of ESG and CoC funds and establish funding priorities
- < Review and recommend RLFC action on the HUD CoC Application including all relevant charts and tables
- < Review and act on provider appeals as necessary
- < Review and act on the annual Point in Time Count
- < Review and act on the annual Housing Inventory Chart and Gap Analyses
- < Review and act on any other HUD mandated activity

Performance Monitoring

- < Review existing projects and programs and recommend actions to the RLFC
- < Review and recommend to the RLFC any programs that should be removed from HUD funding and any proposed funding reallocations
- < Recommend to the RLFC actions against poor performers
- < Review existing projects and make recommendations to the full RLFC for its consideration, action and inclusion in the consolidated HUD CoC application.
- < Review ongoing projects that have participated in QII at the request of the provider and/or CSB
- < Review and approve annual performance standards and evaluation of outcomes for programs funded under the ESG and CoC programs

New Programs

- < Review and incorporate feedback from the RLFC provider group on new projects and any other relevant topics
- < Review and incorporate feedback from the CAC group on new projects and any other relevant topics
- < Hear presentation from any new project developer about its proposal. The project developer will also be asked to make a presentation to the RLFC Board to respond to questions about its proposal.

- < Make recommendations to the full RLFC for its consideration, action and inclusion in the consolidated HUD CoC application of any proposed new supportive housing bonus project
- < Review and recommend the new permanent supportive housing (PSH) priority for consideration by the Ohio Housing Finance Agency

HMIS Operations

- < Designate a single HMIS for the CoC
- < Designate an HMIS Lead
- < Ensure consistent participation in HMIS (delegated to CSB). Monitor that all recipients of financial assistance under the CoC and ESG programs and any programs funded previously through McKinney-Vento Act (SHP, SPC, SRO) are using the HMIS to collect client-level data on persons served.
- < Ensure the HMIS compliance with HUD requirements (delegated to CSB)
- < Review and approve the HMIS policies and procedures, privacy plan, security plan and data quality plan for the operation and administration of the local HMIS

If the provider is not satisfied with a decision made by CSB (for funded providers) or the RLFC Board (for all providers), the provider may appeal this decision to CSB's Board of Trustees (for funded providers) or the RLFC (for non-funded providers).

Decision Making

Quorum: A majority of the RLFC Board members shall constitute a quorum at all meetings thereof. The meeting will be adjourned if no quorum is present and no voting will occur in such case.

Robert's Rules of Order will be followed and a simple majority voting is necessary for any resolution of the committee to be passed. Voting by proxy is allowed only in circumstances wherein subrecipients of HUD funding request budget amendments. Quorum for a vote by proxy may only constitute the full roster of RLFC Board members. Voting by proxy may be completed via mail, facsimile, or electronic mail, and the complete record of each vote by proxy shall be collected and maintained by CSB. In order for a budget amendment vote by proxy to be finalized, a majority of all RLFC Board members must represent the leading vote.

No RLFC Board member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.

3. Conflict of Interest

Any individual participating in or influencing decision making must identify actual or perceived conflicts of interest as they arise and comply with the letter and spirit of this

policy. Disclosure should occur at the earliest possible time and if possible, prior to the discussion of any such issue. Individuals with a conflict of interest should abstain from voting on any issue in which they may have a conflict. An individual with a conflict of interest, who is also the committee chair, shall yield that position during discussion and abstain from voting on the item.

Annual written disclosure statements will be provided by each committee member by June 30. Members will not be permitted to participate until the statement is on file at CSB.

4. New member elections

For the RLFC membership, the RLFC Board will propose new member participation each year, using the membership composition described in section 1. The RLFC Board will receive recommendations for consideration from the CAC, CSB Board, and the Columbus Coalition for the Homeless for their respective organizations' representation. CSB will post on the csb.org website by March 1 of each year that nominations for RLFC membership are open. The nomination period will remain open until the RLFC Board meeting in April. The RLFC Board will consider the nominations and recommendations at their April meeting. The RLFC Board will have to reach consensus when recommending new members for the RLFC. In this context, consensus means that first a unanimous vote will be attempted. If unanimity cannot be achieved, a positive vote by two-thirds (2/3) of the members (7) is needed for a new member to be recommended. The RLFC will vote on the RLFC Board recommendations at its May meeting. These meetings are open to the public. The new membership will take effect July 1 for the following fiscal year.

For the RLFC Board membership, the RLFC Board will propose new member participation every other year. The RLFC Board will receive recommendations for consideration from the CAC, CSB Board, and the Columbus Coalition for the Homeless for their respective organizations' representation. These representatives must be members of the RLFC. The RLFC Board will have to reach consensus when recommending new members for the RLFC Board. In this context, consensus means that first a unanimous vote will be attempted. If unanimity cannot be achieved, a positive vote by two-thirds (2/3) of the members (7) is needed for a new member to be recommended. The RLFC Board membership will not exceed 11. A minimum of 2 and a maximum of 5 new members will be recommended every two years. In proposing new members, the RLFC Board will be mindful that the RLFC Board membership must be free of any factual or perceived conflict of interest. The recommendations will be made at the April RLFC Board meeting. The RLFC will vote on the RLFC Board recommendations at its May meeting with the new membership taking effect July 1 for the following two fiscal years.

5. Rebuilding Lives Plan Activities

The RLFC will not serve as the convener for the plan's strategies, but will provide stewardship and oversight for the overall community plan to end homelessness, the Rebuilding Lives (RL) Plan.

The role of the Strategy Conveners is as follows:

- < Form a planning group
- < Identify resources for planning
- < Report progress to the RLFC
- < May (or may not) serve as lead implementing agency
- < Suggest resources for implementation
- < Assist the RLFC with securing resources.

Throughout the implementation of the RL Plan, evaluation efforts will assess the degree to which the plan is executed and will track the success of each strategy. Columbus ServicePoint (CSP), our community's Homeless Management Information System (HMIS), will be used as the primary data source. CSP will be used for enhancing data collection activities related to the RL Plan. It will also be used as a monitoring, outcomes measurement, and performance-based contracting tool across systems and to inform the community about the progress of the RL Plan and meet HUD requirements.

Community Shelter Board Activities

The Community Shelter Board will be the primary organization supporting all of the groups involved with moving the RL Plan forward. In addition to its roles as a convener of some of the RL Plan strategies, CSB will be responsible for the following:

Operations of the CoC

- < Chair the RLFC and RLFC Board and serve as the fiscal agent
- < Staff the RLFC and RLFC Board and provide support
- < Issue annually a public request for new RLFC member nomination
- < Act as the Collaborative Applicant for the Columbus and Franklin County RLFC, per HUD's HEARTH legislation
- < Act as the Unified Funding Agency for the Columbus and Franklin County RLFC, per HUD's HEARTH legislation
- < Act as the HMIS Lead for the Columbus and Franklin County RLFC, per HUD's HEARTH legislation
- < Act as the subrecipient of the Emergency Solutions Grant (ESG) funds for the Columbus and Franklin County RLFC

CoC Planning

- < Implement the requirements of the HEARTH legislation as mandated by HUD
- < Prepare and present to the RLFC Board annual funding allocations, inclusive of ESG and CoC funds and semi-annual updates on funding allocations
- < Provide program and system level performance monitoring and evaluations of outcomes
- < Establish and operate a coordinated assessment system for homeless individuals and families
- < Establish and consistently follow written standards for the provision of ESG and CoC assistance
- < Communicate the RL Plan progress to the community, including an annual Report Card
- < Meet the HUD record keeping requirements, inclusive of CoC records
- < Plan and conduct a sheltered and unsheltered point-in-time count of homeless persons
- < Conduct an annual gaps analyses of the homeless needs and services
- < Provide required information to complete the local Consolidate Plan(s)
- < Certify the applicants/projects for ODSA grants

HMIS Operations

- < Ensure consistent participation in HMIS (delegated to CSB)
- < Ensure the HMIS compliance with HUD requirements (delegated to CSB)
- < Prepare the HMIS policies and procedures, privacy plan, security plan and data quality plan (delegated to CSB)
- < Operate as the HMIS Lead and make system-wide decisions regarding the HMIS that impact all covered homeless organizations. HMIS Lead means the entity designated by the RLFC Board in accordance with 24 CFR part 580 to operate the Continuum's HMIS on the RLFC's behalf.

6. Point in Time Count Plan

Consistent with HUD requirements and in concert with the Ohio Count, an annual Point in Time Count will be conducted. Participation in the Homeless Count Work Group will be open to all interested. The RLFC Board will review and approve the Point in Time Count Plan annually and empower CSB to lead coordination efforts to conduct the count.

7. HUD Application Process

The RLFC will meet annually to review and act on the HUD CoC Application including all relevant charts and tables. CSB will coordinate the applicant submission of CoC project applications, prepare the CoC Application, and submit the consolidated application on behalf of the RLFC.

8. ODSA Application Processes

To fulfill the ODSA Homeless Assistance programs application processes, CSB will certify applicants/projects on behalf of the RLFC Board and make recommendations to ODSA. Agencies that disagree with CSB will appeal to the RLFC Board via electronic appeals.

9. Letter of Support and Certification

Programs and services which meet the needs of homeless families and individuals in Franklin County, Ohio are eligible to request letters of support or certification from the RLFC Board and CSB. The RLFC Board will only provide letters of support or certification to agencies which have a record of providing quality services to persons who are homeless or at risk of homelessness, and for projects that are consistent with the local priorities established by the RLFC. New agencies must demonstrate the ability to provide high quality services. Projects may receive letters of support or certification if they:

- < Document the need for the program;
- < Provide a clearly defined program with attainable outcomes;
- < Demonstrate collaboration with other community-based organizations;
- < Demonstrate the provision of high quality services; and
- < Deliver services in a highly cost-effective manner.

10. Program Performance Standards

Program performance standards will be established by CSB and recommended to the RLFC Board for approval and will incorporate HUD requirements and local standards. CSB will incorporate these standards into annual program agreements with each provider agency. An annual Program Outcome Plan (POP) will be part of the agreement. If CSB and the agency disagree on the annual POP, the agency may appeal to the RLFC Board (if not CSB-funded) or CSB Board Chair (if CSB-funded). CSB will monitor program performance and provide monthly, quarterly, semi-annual and annual data reports. Program performance standards will be reviewed annually by the RLFC Board.

11. Quality Improvement Intervention

CSB will address programs of ongoing concern through a Quality Improvement Intervention (QII) process. The QII process is based on quarterly one-on-one dialogues between CSB and the provider agency and considers agency plans and progress on addressing program issues. CSB and provider agency enter into quarterly QII if a program experiences long-standing and/or serious program issues and/or systemic agency concerns. If the agency and/or CSB find that the QII process is not working, either may refer the concerns/issues to the RLFC Board for handling. The provider will be given an opportunity to present its case to the RLFC Board before it makes its recommendation to the RLFC.

Through its evaluative work, CSB will establish performance ratings every year of each HUD and CSB funded programs. Based on these ratings, CSB will recommend the RLFC Board programs that should not continue to receive funding through the annual HUD application process due to underperformance. All programs rated as “Low” performers through CSB’s annual Program Evaluation will be discussed at the RLFC Board. CSB will recommend the RLFC Board any funding reallocations that should occur based on program performance and need.

The RLFC will be the final decision maker regarding any programs that should be removed from HUD funding and any proposed funding reallocations.

12. Meeting Support

CSB will provide meeting support for the RLFC and RLFC Board and all other committee meetings by scheduling meetings, developing agendas, issuing meeting materials and posting all relevant documents to www.csb.org.

- < RLFC and RLFC Board members may suggest agenda items
- < Agenda and meeting materials will be released one week prior to scheduled meetings.
- < The agenda will be reviewed and adopted at the start of the meeting; changes may be offered for consideration.
- < Meeting notes will be produced and distributed within 30 days of the meeting.
- < Materials will be distributed electronically or through mail to all RLFC and RLFC Board members and provider agency designees.

13. Costs

Every effort will be made to keep process costs to the minimum necessary to achieve full funding. CSB will work to raise funds to support the processes of the RLFC, including central administrative requirements related to HMIS and the PIT Count.

HMIS / CSP Lead Roles and Activities / Columbus ServicePoint Implementation

CSB, as the RLFC designated HMIS Lead will maintain the community’s Homeless Management Information System (HMIS) – Columbus ServicePoint – in compliance with HUD standards and coordinate all related activities including training, maintenance and technical assistance to agencies. Each participating agency or Contributing HMIS Organization (CHO) will be expected to participate in the CSP Administrators Group which oversees CSP operations. Annually, CSB will conduct an anonymous Administrator/User survey and provide the results of that survey to the RLFC Board.

CSB has the following roles:

- < Make decisions about HMIS management and administration

- < Designate a single information system as the official HMIS software for the geographic area
 - < Develop all policies and plans the HMIS lead is required to develop. Annually update the Security Plan, Data Quality Plan and Privacy Policy
 - < Develop a governance charter and document all assignments and designations consistent with the governance charter. The charter is to contain, at the minimum:
 - A requirement that the HMIS Lead enter into written HMIS Participation Agreements with each Contributing Homeless Organization (CHO) requiring the CHO to comply with this part and imposing sanctions for failure to comply;
 - The participation fee charged by the HMIS; and
 - Such additional requirements as may be issued by notice from time to time.
- 14.** Ensure the operation of and consistent participation by recipients of funds from the Emergency Solutions Grants Program and from the other programs authorized by Title IV of the McKinney-Vento Act. Duties include establishing the HMIS; conducting oversight of the HMIS; and taking corrective action, if needed, to ensure that the HMIS is compliant with all HUD requirements; Ensure that all recipients of financial assistance under the Continuum of Care program and the Emergency Solutions Grant program and any programs funded previously through McKinney-Vento Act (SHP, SPC, SRO) are using the HMIS to collect client-level data on persons served.
- 15.** Develop written HMIS policies and procedures for all CHOs for the operation of the HMIS;
- 16.** Execute a written HMIS Participation Agreement with each CHO, which includes the obligations and authority of the HMIS Lead and CHO, the requirements of the security plan with which the CHO must abide, the requirements of the privacy policy with which the CHO must abide, the sanctions for violating the HMIS Participation Agreement (e.g., imposing a financial penalty, requiring completion of standardized or specialized training, suspending or revoking user licenses, suspending or revoking system privileges, or pursuing criminal prosecution), and an agreement that the HMIS Lead and the CHO will process Protected Identifying Information consistent with the agreement. The HMIS Participation Agreement may address other activities to meet local needs;
- 17.** Serve as the applicant to HUD for grant funds to be used for HMIS activities for the Continuum of Care's geographic area, as directed by the RLFC, and, if selected for an award by HUD, enter into a grant agreement with HUD to carry out the HUD-approved activities;
- 18.** Monitor and enforce compliance by all CHOs with the requirements of this part and report on compliance to RLFC Board and HUD;

- 19.**The HMIS Lead must submit a security plan, a data quality plan, and a privacy policy to the RLFC Board for approval within [the date that is 6 months after the effective date of the final rule to be inserted at final rule stage] and within 6 months after the date that any change is made to the local HMIS. The HMIS Lead must review and update the plans and policy at least annually. During this process, the HMIS Lead must seek and incorporate feedback from the RLFC Board and CHO. The HMIS Lead must implement the plans and policy within 6 months of the date of approval by the RLFC Board.
- 20.**The HMIS Lead must develop a privacy policy. At a minimum, the privacy policy must include data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description; access and correction standards; accountability standards; protections for victims of domestic violence, dating violence, sexual assault, and stalking; and such additional information and standards as may be established by HUD in notice.
- 21.**The HMIS Lead must establish a security plan which meets the minimum requirements for a security plan as established by HUD in notice.
- 22.**The HMIS Lead must designate a security officer to be responsible for ensuring compliance with applicable security standards. The HMIS Lead must designate one staff member as the HMIS security officer.
- 23.**The HMIS Lead must ensure that each covered homeless organization designates a security officer and conduct workforce security measures.
- 24.**The HMIS Lead must conduct workforce security screening; The HMIS Lead must ensure that each CHO conduct criminal background checks on the HMIS security officer and on all administrative users. Unless otherwise required by HUD, background checks may be conducted only once for administrative users.
- 25.**The HMIS Lead must report security incidents. Each HMIS Lead must implement a policy and chain of communication for reporting and responding to security incidents, including a HUD-determined predefined threshold when reporting is mandatory, as established by HUD in notice.
- 26.**The HMIS Lead must establish a disaster recovery plan. The HMIS Lead must develop a disaster recovery plan, which must include at a minimum, protocols for communication with staff, the RLFC Board, and CHOs and other requirements established by HUD in notice.
- 27.**The HMIS Lead must conduct an annual security review. Each HMIS Lead must complete an annual security review to ensure the implementation of the security requirements for itself and CHOs. This security review must include completion of a security checklist

ensuring that each of the security standards is implemented in accordance with the HMIS security plan.

28. The HMIS Lead must ensure that each user completes security training at least annually and prior to given access to the HMIS.
29. The HMIS Lead must ensure that each covered homeless organization conducts an annual security review.
30. The HMIS Lead must set data quality benchmarks including bed coverage rates and service-volume coverage rates.
31. The HMIS Lead must develop and implement a data quality plan.
32. The HMIS Lead may archive data in the HMIS but follow standards published in the Federal Register notices.
33. The HMIS Lead must, at least annually, or upon request from HUD submit an unduplicated count of clients served and an analysis of unduplicated counts.
34. The HMIS Lead shall submit reports to HUD as required.

Provider Activities

35. Provider Input

The RLFC values input and participation by the HUD providers in all processes. These shall include:

- < Designated seats on all committees
- < The opportunity to review and comment on new projects prior to RLFC Board review
- < The opportunity to review and comment on RLFC annual plan, policies, and program standards

36. Provider Program Requirements and Rights

Provider agencies are the cornerstone of success for the implementation of the RL Plan. A collaborative, streamlined system with clear goals and objectives will result in continued success for provider agencies. Provider agency roles include the following:

- < Continue to develop and implement high-quality programs and services
- < Work together with conveners, collaborators, and funders to build support for programs
- < Share and implement best practices and collaborate with other providers
- < Work together with funders to evaluate programs and engage in quality improvement activities
- < Participate in advocacy efforts

The RLFC expects that Providers will meet requirements to receive HUD Funding and intends to treat all providers fairly in evaluating performance.

Requirements:

- < Meet relevant program and HUD standards and achieve program outcome goals
- < Submit an annual program outcome plan in line with HUD and RLFC requirements and update program descriptions through the annual CSB Gateway process
- < Submit CoC project application per HUD timeline
- < Submit required data through Columbus ServicePoint
- < Submit a copy of HUD APR to CSB concurrent with submission to HUD

Rights:

- < Participate in Quality Improvement Intervention (QII) prior to HUD funds being reduced or eliminated by the RLFC
- < Appeal to the RLFC if it disagrees with a recommendation by the RLFC Board
- < Request a waiver from compliance with specific program performance standards
- < Submit Concept Papers and Project Plans for new supportive housing projects, for the consideration of the RLFC Board and the RLFC, in accordance with the standards for development of new projects, found at www.csb.org

37. Committees

The following committees are currently operational. These committees are also staffed by Community Shelter Board representatives.

Adult System Operations Workgroup (ASOW) – a provider group comprised of representatives of non-profit agencies operating emergency shelters for single adults, the coordinated point of access to emergency shelter and outreach providers. The group meets at least monthly, more often during the winter overflow season, to further the provision of services for homeless single adults.

Family System Operations Workgroup (FSOW) – a provider group comprised of representatives of non-profit agencies operating the emergency shelter for families and the front door to the family shelter, the local domestic violence provider, providers of direct housing/rapid re-housing services and providers of family prevention activities. The group meets monthly to further the provision of services for homeless families.

Permanent Supportive Housing Roundtable – a provider group comprised of representatives of non-profit agencies operating the permanent supportive housing programs in the community, the local mental health and substance abuse board and the

local housing authority. The group meets quarterly to improve the provision of permanent supportive housing system and services for formerly homeless single adults and families.

HMIS (CSP) Administrators Group - a provider group comprised of representatives of non-profit agencies using the local homeless management information system, Columbus ServicePoint (CSP). Each agency that has access to CSP must have a designated primary and backup administrator. Both are invited to participate at this quarterly meeting where new HMIS developments are discussed and improvements to the system and proposed and implemented.

Citizens Advisory Council (CAC) The Citizens Advisory Council is a CSB sponsored group that has membership comprised of homeless and formerly homeless individuals. This group meets monthly.

The RLFC values input and participation by the CAC in all processes. These shall include:

- < Designated seats on committees.
- < The opportunity to review and comment on new projects prior to RLFC Board review.
- < The opportunity to review and comment on RLFC annual plan, policies, and program standards.

Point in Time Count Workgroup – a group comprised of representatives of non-profit agencies operating emergency shelters, the coordinated point of access to emergency shelter outreach providers, local homeless advocacy groups and other social service agencies. The group meets starting in the fall of each year and until the annual point in time count occurs and all the counting is finalized. The purpose of the group is to plan and implement the annual point in time count of unsheltered homeless individuals.