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# El Paso Coalition for the Homeless

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## Governance Charter

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## Introduction and Purpose

This document outlines key operational components of the Continuum of Care (CoC), including policies and procedures for the CoC. This document serves as the El Paso City & County Continuum of Care Governance Charter. El Paso Coalition for the Homeless serves as the backbone organization for the Continuum of Care.

## Organization

The name of this organization is the El Paso Continuum of Care (hereinafter referred to as the “El Paso CoC”). US Department of Housing and Urban Development (HUD) refers to this as TX-603.

## Geographic Area

The El Paso CoC carries out its activities throughout all of El Paso County, TX.

## Purpose

The purpose of the El Paso CoC is to:

- Promote community-wide commitment to the goal of ending homelessness through advocacy, education and collaboration;
- Identify gaps in the CoC and develop resources to fill those gaps, including the provision of decent affordable housing, education and employment and accessible healthcare;
- Promote access to and effective utilization of mainstream programs by homeless individuals and families; and
- Optimize self-sufficiency among individuals and families experiencing homelessness.

## Responsibilities

The El Paso CoC is responsible for fulfilling the following duties:

### Operation of the El Paso CoC

- Hold meetings of the full membership, with published agendas, at least semi-annually;
- Issue a public invitation annually for new members to join within the geographic area;
- Adopt and follow a written process to select a CoC board and review, update, and approve the process at least once every 5 years;
- Appoint additional committees, subcommittees, or workgroups;
- Adopt, follow, and update annually a governance charter in consultation with the collaborative applicant who also serves as the Homeless Management Information System (HMIS) lead;
- For CoC and Emergency Solutions Grant (ESG) grants, establish performance targets appropriate for population and program type in consultation with recipients and subrecipients, then monitor recipient and subrecipient performance, evaluate outcomes, take actions against poor performers, and report to HUD;

- Establish and operate a centralized or coordinated assessment system in consultation with recipients of ESG Funds; and
- Establish and follow written standards for providing CoC assistance in consultation with recipients of ESG Funds. At a minimum, these written standards must include
  - a. Policies and procedures for evaluating individuals' and families' eligibility for assistance;
  - b. Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
  - c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive rapid rehousing assistance;
  - d. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance; and
  - e. Policies and procedures for determining which eligible individuals and families will receive permanent supportive housing assistance.

### **Designation and operation of a Homeless Management Information System (HMIS)**

- Designate a single HMIS for its geographic area and designate an eligible applicant to manage its HMIS;
- Review, revise, and approve privacy, security, and data quality plans;
- Ensure consistent participation of recipients/subrecipients in HMIS; and
- Ensure that the HMIS is administered in compliance with HUD requirements.

### **Continuum of Care Planning**

The TX-603 El Paso City & County will develop and maintain a plan that includes:

- Coordinating the implementation of a housing and services system, to include:
  - Outreach, engagement, and assessment
  - Shelter, housing, and supportive service
  - Prevention strategies
- An annual Housing Inventory Chart (HIC) and a point-in-time (PIT) count for homeless persons who are unsheltered and sheltered, including emergency shelters, transitional housing, permanent supportive housing and rapid re-housing
- An annual gaps analysis
- Collaborating with the City of El Paso who is responsible for developing Consolidated Plans
- Consulting with Emergency Solutions Grant (ESG) recipients about the allocation of ESG funding, evaluation of ESG grants and reporting on the performance of ESG recipients, sub-recipients and sub-sub recipients
- Promoting community-wide commitment to the goal of ending homelessness
- Providing funding for efforts by nonprofit providers, States and local governments to re-house homeless individuals and families rapidly while minimizing the trauma and dislocation caused to homeless individuals
- Promoting access to and the effective use of mainstream programs by homeless individuals and families
- Optimizing self-sufficiency among individuals and families experiencing homelessness

### **Procedure**

The CoC provides continuous planning and coordination of services through the CoC General Membership and the CoC Standing Committees whose core functions include ensuring that individuals and families experiencing homelessness have appropriate and allowable choices in the following areas:

- Unsheltered outreach
- Emergency shelter
- Transitional housing
- Rapid re-housing
- Permanent Supportive Housing
- Addressing the needs of subpopulations including, but not limited to, unaccompanied youth, persons with disabilities, veterans and those fleeing domestic violence

The CoC Plan includes reducing interagency barriers through coordinated assessment, disruptions in service, and communication gaps. Monthly interagency case manager meetings deal with specific client issues that allow them to determine the most effective methods for stabilizing clients who are having difficulty succeeding. An online searchable housing providers list is available and maintained by a CoC member agency. El Paso Coalition for the Homeless website maintains service providers' resource information.

The CoC Strategic Plan incorporates the strategies of the City of El Paso 5 Year Consolidated Plan. The El Paso Coalition for the Homeless, as the CoC Collaborative Applicant and Lead Agency has developed a strategic plan to coordinate and develop strategies and resources to end homelessness. The CoC Strategic Plan includes the following:

- Housing – Increasing the availability and accessibility of affordable housing
  - Data Collection and Gaps Assessment
  - Advocacy
  - Create Resource Guide
  - Funding
- Employment – Improve and expand employment assistance network
  - Inventory of existing programs to educate, train and employ the homeless
  - Develop strong relationships with agencies focusing on education, training & employment
  - Develop volunteer program to teach skills and develop self –esteem
  - Develop employment network
  - Develop resource guide/directory
  - Funding
- Healthcare – Build a more comprehensive health care system
  - Expand the community's medical capacity through knowledge, research and resources that address the health care needs of the homeless population
  - Educate the community of the healthcare needs of the homeless through a health awareness campaign

Progress will be reviewed on an annual basis.

## **Training and Technical Assistance**

Training and Technical Assistance:

- The CoC Lead will schedule and determine the number of trainings a year. Training sessions will consist of case management and SSI/SSDI Outreach, Access, and Recovery (SOAR). The CoC's staff will utilize the data gathered from the Point-In-Time (PIT), Annual Performance Reports, and the CoC's Performance Targets identified to determine the type of training and technical assistance needed within the CoC system.

- The CoC Lead will offer SOAR training at least annually.

## Preparation of a CoC Application for Funds

- Design, operate, and follow a collaborative process for the development of applications and approve submission of applications in response to a CoC Program Notice of Funding Availability (NOFA);
- Establish priorities for funding projects;
- Designate the collaborative applicant to submit the application;
- The collaborative applicant must collect and combine the required application information from all projects within the geographic area and will apply for funding for CoC planning activities.

## CoC Membership

### Continuum of Care Membership

The CoC is made stronger through the participation of broad and diverse Members. Therefore, membership in the CoC is open to any individual or organization that embraces the mission, values and goals of the CoC. Much of the work of the CoC will be carried out by the CoC Board and Committees, with input from Members, with the following exceptions:

- Members will vote directly to approve the governance framework set forth in this Governance Charter and any subsequent changes or additions to the Governance Charter; and
- Every five (5) years following initial approval of this Governance Charter, Members will review, update, and ratify changes to the Governance Charter; and
- Members will vote on any other issues that are relevant to ending homelessness.

### Membership Benefits and Responsibilities

A CoC Member is any individual or organization with an interest in understanding and addressing the issues related to homelessness, and a desire to participate in some way in the El Paso Coalition for the Homeless' coordinated plan to end homelessness. The CoC recognizes that many stakeholders are invested in addressing homelessness in our city. However, the CoC believes that the most important stakeholders are people with lived homeless experience and those at risk of homelessness. Because their participation is essential to the CoC governance and management, they are considered Members and afforded all of the benefits of CoC membership whether or not they pay dues as determined by the Coalition Board of Directors.

### Membership Benefits

- Invitation to monthly open CoC meetings
- Voting rights on issues set forth in Continuum of Care Membership
- Eligible for committees
- Access to training and technical assistance opportunities
- Access to CoC information
- Opportunities to network with people doing similar work or interests

## Membership Responsibilities

- Attendance at monthly public CoC meetings
- Participation in advocacy initiatives
- Pay annual dues

Members are committed to working together to advance the mission and purpose of the CoC and achieve the goals of El Paso's plan to end homelessness and adhere to all guidelines, policies and procedures set forth by the CoC.

## Membership Meetings

The full membership of the El Paso CoC shall meet at least semi-annually. Meetings shall include a report on the CoC's activities through reports from the Board and standing committees, and training and networking opportunities for members.

All El Paso CoC members shall be notified of the date and location of membership meetings. The final meeting of the year will be the Annual Meeting. The agenda for the Annual Meeting will include:

- A review of any proposed changes to the El Paso CoC Governance Charter followed by a vote on those changes; and
- Any other business the Board chooses to put before its members.

## Notice of Meeting

Notice of the place, date and time of each Membership Meeting, including the Annual Meeting, shall be sent to members by email or other reasonable means of communication at least five business days before the meeting date, along with the agenda for the meeting.

## Quorum and Voting

The members present at any properly announced meeting of El Paso CoC members shall constitute a quorum. Issues presented to El Paso CoC members for a vote will be decided by simple majority of the votes cast, except when otherwise provided by statute.

## CoC Board

The El Paso CoC shall be governed by a Board, which will provide oversight and accountability for all El Paso CoC responsibilities.

## Responsibilities of the Board

Except for those responsibilities assigned to the El Paso CoC members listed above, the Board will act on behalf of the El Paso CoC to fulfill the regulatory duties of a continuum of care set forth in 24 CFR § 578. The Board shall be responsible for approval and implementation of all CoC policies and procedures.



## Board Membership

### Composition

The Board will consist of no less than 5 and no more than 9 members. Relevant organizations include nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans and homeless and formerly homeless individuals.

The Collaborative Applicant will not have dedicated seats on the Board. The CoC's intention is to ensure a balance of constituencies represented on the Board while ensuring a path for new stakeholders to serve on the Board.

### Term of Office

Board members will serve terms of two years.

### Resignation and Removal

Unless otherwise provided by written agreement, any representative may resign at any time by giving written notice to the Chair. Members may be removed at any time for cause by the Board.

### Vacancies

If for any reason a vacancy occurs on the Board, the Board shall elect a member to fill the vacancy ensuring that representatives of the board are compliant with 24 CFR 578.

## Officers

### Officers

The CoC Board will elect a Chair, Vice-Chair, Secretary, Treasurer and At-Large officer that will make up the Executive Committee.

### Chair and Vice Chair

The Chair is responsible for scheduling meetings of the CoC and Board, ensuring that the Board meets regularly or as needed, and for setting the agenda for these meetings in collaboration with the Executive Committee. The Chair governs and leads the CoC Board. In the absence of the Chair, the Vice Chair assumes the duties of the Chair.

### Secretary

The Secretary will keep accurate records of the acts and proceedings of all meetings of the Board, or designate another person to do so at each meeting, including documenting all actions taken without a meeting. Such records will include the names of those in attendance. The Secretary will be responsible for the timely posting and dissemination of all meeting summaries, minutes, announcements, and notices, or for ensuring that such minutes, announcements and notices are posted and disseminated by designated entities. The Secretary will chair Board meetings in the case of the absence of the Chair and Vice Chair.

### Treasurer

The Treasurer will keep the board informed of key financial events, trends, concerns, and assessment of fiscal health in addition to completing required financial reporting forms in a timely fashion and making

these forms available to the board. The Treasurer will also serve as the Chair of the Finance Committee of the Board (if applicable).

### **At-Large**

The At-Large Officer will participate in the development of Board agendas and will be responsible for coordinating, with designated Committees, the review of performance and designation processes for the designated entities.

### **Term of Office**

Officers will serve one year terms. At the end of each term officers will be elected.

### **Officer Vacancies**

Any officers may be removed at any time for cause by the Board. If any office becomes vacant for any reason, the vacancy shall be filled from within the Board.

## **Rules of Governance for the Board**

### **Quorum and Voting**

One-third of the current number of Board members shall constitute a quorum for the transaction of business at any meeting. If a vote is necessary, all votes shall be by voice or ballot at the will of the majority of those in attendance at a meeting with a quorum represented. Each representative seat shall have one vote. No member may vote on any item which presents a real or perceived conflict of interest as per the Conflict of Interest policy contained herein and statements by each board member annually.

At all meetings, every effort should be made for business items to be decided by arriving at a consensus of the Board. Votes will be by voice or ballot at the will of the majority of those in attendance at a meeting with a quorum represented. Each representative seat will have one vote. No Director shall vote on any item that presents a real or perceived conflict of interest. If a Director calls for Division of the House under *Robert's Rules of Order Newly Revised*, individual votes can be recorded in the meeting minutes and the Board Chair will be responsible for ensuring accurate documentation of those votes.

### **Regular Meetings**

The Board shall hold a minimum of six (6) regular meetings each year, the day and time to set by the Chair, with the approval of the Board. The agenda shall include minutes of the previous meeting, a treasurer's report, and other reports needed for the Board action or information. Except as otherwise provided by statute, any and all business may be transacted at any regular meetings.

## **Committees and Working Groups**

The El Paso CoC will carry out its responsibilities through the work of a number of Committees and Working Groups. All CoC Members may participate on Committees and Working Groups. Procedural rules made by Committees of the Board must be approved by the Board. Each committee shall keep regular minutes of its proceedings and report to the Board when required.

## Standing Committees of the CoC

### Planning Committee

The Planning Committee's primary responsibility is to conduct an annual planning cycle that includes preparing a detailed inventory of resources available to homeless persons in El Paso County, analyzing the demand for and availability of resources to identify duplications or unmet needs and advocating on behalf of homeless persons, and educating the broader community regarding their needs and the resources available to meet those needs. The Planning Committee shall have no authority or responsibility to make decisions regarding the CoC's priority needs or the best means of meeting those needs.

### HMIS Management Committee

The HMIS Committee will work with the HMIS Lead to:

Develop, annually review, and, as necessary, revise for Board approval a privacy plan, security plan, and data quality plan for the HMIS, as well as any other HMIS policies and procedures required by HUD.

- Develop for Board approval and implement a plan for monitoring the HMIS to ensure that:
  - Recipients and subrecipients consistently participate in HMIS;
  - HMIS is satisfying the requirements of all regulations and notices issued by HUD;
  - The HMIS Lead is fulfilling the obligations outlined in its HMIS Governance Charter and Agreement with the CoC, including the obligation to enter into written participation agreements with each contributing HMIS organization.

### HMIS Steering Committee

Oversees and monitors HMIS data quality and data collection for the production of the following reports:

- Sheltered point-in-time count;
- Housing Inventory Chart;
- Annual Homeless Assessment Report (AHAR);
- System Performance Measures;
- Ecart; and
- Annual Performance Reports (APRs).

## Other Committees and Working Groups

The CoC may establish committees or working groups as it deems necessary including but not limited to:

- Strategic Planning Priority Committees
- Coordinated Access Oversight Committee
- CoC Application Ad Hoc committee
- Performance and Outcomes task force
- Veterans Services working groups
- School District Homeless Liaisons committee
- Shelter Discussion Group
- Recovery Oriented System of Care

## Appointment of Agents and Designation of HMIS

### Collaborative Applicant

The El Paso Coalition for the Homeless (“Coalition”) serves as the El Paso CoC’s Collaborative Applicant.

## **HMIS Lead**

The Coalition serves as the El Paso CoC’s HMIS Lead.

## **HMIS Designation**

The El Paso CoC designates the Clarity Human Services system as the single Homeless Management Information System for its geographic area.

## **HMIS Governance Charter**

The duties and responsibilities of the El Paso CoC, the HMIS Lead, the HMIS/Data Committee and Contributing HMIS Organizations are set forth in further detail in the HMIS Governance Charter, approved simultaneously with this El Paso CoC Governance Charter.

## **Continuum of Care Policies**

### **Conduct and Attendance**

The CoC Board is responsible to its stakeholders that include affiliates and others who have placed faith in the mission, support the goals and work on behalf and with people who are experiencing homelessness in El Paso County.

To uphold this trust the CoC Board will:

- Promote good stewardship of the Board resources
- Refrain from using organizational resources for non-Board purposes
- Insure open and transparent reporting and fiscal accountability

The CoC Board will disclose fully the state of the El Paso CoC, recognizing that power comes from a healthy evaluation of both strengths and weaknesses, and uphold the highest standards of accountability.

A copy of the Code of Conduct will be distributed to all Board members and available to others upon request. The Code will be reviewed periodically.

### **Conflict of Interest & Recusal**

It is the policy of the CoC that a conflict, or the appearance of a conflict, between the Board or any of its official committees and the organizations, which are receiving awards of grants or benefitting from other business items, shall in all cases be avoided. No member of the CoC (Board, Committee, Member, Agent or employee of Agent) shall vote or make recommendations on funding decisions that directly benefit them or any organization in which they have a direct financial interest. To that end, neither Board nor Committee members whose organizations are submitted in the HUD CoC Application and ranked for that application may participate in discussions about ranking policies or vote on ranking policies. Such members may

participate in the development of performance targets and the evaluation tool. Persons with lived homeless experience who receive services from an organization that may directly benefit from a funding decision may vote or make recommendations on funding decisions. Members of the CoC will disclose potential conflicts of interest that they may have regarding any matters that come before the CoC Board.

## **Disclosure and Conflict of Interest Form**

As soon as they become aware of any actual or potential conflict of interest, whether at the beginning of a meeting or, during the course of a meeting of the full CoC, the Board, or any committee or advisory board, CoC members, Board members, and committee members must disclose such actual or potential conflicts of interest regarding any business included in the meeting's agenda. If any person who is a Board or committee member is aware that the CoC is about to enter into any business transaction directly or indirectly with such person, any member of such person's family, or any entity in which such person has any legal, equitable or fiduciary interest or position, including without limitation as a director, officer, shareholder, partner, beneficiary, trustee or employee, such person shall:

- Immediately inform the Chair
- Aid the persons charged with making the decision by disclosing any material facts within such person's knowledge that bear on the advisability of such transaction from the standpoint of the CoC
- Not be entitled to vote on the decision to enter into such transaction

Each calendar year, CoC Board Directors and Committee/Advisory Board Members must sign a conflict of interest form affirming that they have reviewed the conflict of interest policy and disclosing any conflicts of interest that they face or are likely to face in fulfillment of their duties as Directors or Committee/Advisory Board Members.

## **Abstention from Decision-Making**

Any matter in which CoC members, directors, or committee/advisory board members have an actual or potential conflict of interest will be decided only by a vote of members with no actual or potential conflict of interest. To the matter of general policies of the CoC, even when such votes have impact on the general distribution of resources, it will be sufficient in the discussion and voting that the members of the CoC disclose their relationships. In those cases, it will be left to the discretion of the Executive Committee or Committee Chair to determine if the member may participate in the discussion and vote. In addition, the minutes of any meeting at which such a vote is conducted must reflect the disclosure of interested directors' and committee members' actual or potential conflicts of interest and their abstention.

## **Attendance**

A Board attendance problem occurs if any of the following conditions exist:

- The member has two unexcused absences in a row (unexcused means the member did not notify the Chair of the respective body before a regular meeting to indicate they would be absent from the upcoming meeting).
- The member misses one third of the total number of regular board or committee meetings in a consecutive twelve-month period.

If an attendance problem occurs, the Board will decide what actions to take regarding the member's status on the body at the next regular meeting. If the body decides to terminate the member's participation, termination will be conducted per this policy. The Board will then will promptly initiate a process to begin recruiting a new member.

## Approval of Governance Charter and Subsequent Amendments

This Governance Charter and every subsequent amendment to it must be approved by a majority of El Paso CoC members. In consultation with the Collaborative Applicant and the HMIS Lead, the Board will review the Governance Charter annually and recommend to the Members changes to improve the functioning of the El Paso CoC and maintain compliance with federal and state regulations. In addition, every five years, the Board will invite interested CoC Members to participate in a review and discussion of the Governance Charter. Based on consensus achieved in that discussion, the Board will ask El Paso CoC Members to ratify the existing Governance Charter or approve proposed changes to the Governance Charter at their next Annual Meeting.

## Performance/Monitoring

The CoC is responsible for evaluating outcomes of projects funded under ESG and CoC and reporting to HUD.

### Performance Procedures

The TX-603 El Paso City & County will:

1. Establish performance targets for each population and program type
2. Consult with CoC member agencies to establish:
  - a. Means of monitoring performance of CoC and ESG recipients and sub recipients
  - b. Means of evaluating outcomes of both CoC and ESG recipients
  - c. Means of taking action against poor performers in an on-going fashion

Performance targets will include priorities of the HUD and community priorities and needs determined by CoC Standing Committees and the CoC general membership and will include, but not be limited to, the following:

1. Create new permanent housing beds for the chronically homeless
2. Increase the percentage of homeless persons staying in permanent housing over 6 months
3. Increase the percentage of homeless persons moving from transitional housing to permanent housing
4. Increase percentage of homeless persons employed at exit
5. Increase percentage of homeless persons receiving other sources
6. Increase the percentage of participants in all CoC-funded projects that obtained mainstream benefits at program exit
7. Decrease the number of homeless households with children
8. Increase the overall health of all participants
9. Provide 100% of housing units totally furnished with household items and furniture
10. Provide weekly, ongoing case management with 70% of client service goals accomplished for each client
11. Ensure timely, accurate, and complete data entry into HMIS by the provider to produce the Annual Performance Report (APR) and contribute data to the Annual Homeless Assessment Report (AHAR)

Performance will be monitored by the HMIS administrator and the Collaborative Applicant. Monitoring will include, but will not be limited to, the following:

1. HMIS Administrator will publish Report Cards bi-monthly that include measurement of HMIS usage and CoC & ESG program performance criteria
2. Grantees with failing HMIS grades must attend refresher training
3. Grantees with failing or consistently low performance grades must meet with the Collaborative Applicant to discuss ways to improve performance
4. Grantees with consistently failing grades will be required to document an improvement plan

Grantees unable to improve HMIS usage and performance may have funds reallocated.

## Annual Performance Report

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

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

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

## CoC Project Monitoring

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

The Site/Monitoring Visit will consist of the following activities/components:

1. Tour units/facility, if applicable. Site/unit visits are conducted to evaluate the physical adequacy of the housing provided
2. Review and discuss most recently submitted APR, including goals and progress
3. Review random sample of program files: Comprehensive file review will be completed on at least one file, with other files reviewed if necessary
4. Review results of client satisfaction survey and/or conduct client interviews. Arrangements for client interview will be made in advance of the visit
5. Identify technical assistance needs (from Continuum of Care or other source)

After the site/monitoring visit, a written summary of the visit will be provided to the grantee. The grantee will then have fourteen (14) days to respond in writing to the visit summary report.

If, based on project performance and the grantee's written explanation, and there are no further response or performance recommendations, the Site/Monitoring Visit Summary and the grantee's written response(s) will be filed.

If, based on project performance and the grantee's written explanation, and there are continued performance concerns, draft recommendations to address identified concerns, will be presented to the CoC Board. The recommendations to the CoC Board will be accompanied by the Site/Monitoring Visit Summary and the

grantee's written response(s). All recommendations approved by the CoC Board will be signed by Coalition staff and provided in writing to the grantee. Timelines for corrections and follow-up visits are anticipated to be sixty (60) days or less, but will be defined on a case-by-case basis in the approved recommendations.

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

In addition to an annual Site Visit, Coalition staff may conduct desk monitoring reviews of agency audits, drawdown requests, performance reports and other documentation as necessary for submission to the CoC Board in preparation for the prioritization process and response to the NOFA.

The CoC Board will be responsible for the Rating and Ranking process and prioritization of projects for the NOFA competition. The following was utilized for the FY2015 and requires annual revision to conform to HUD priorities and Planning Committee recommendations.

### **Transitional & Safe Haven Housing**

- HMIS – Is this project following the Standards for Participation in the El Paso Homeless Management Information System (HMIS) AND the El Paso Homeless Management Information System User Agreement?
- Permanent Housing Placements - The % of persons who exited to permanent housing (subsidized or unsubsidized).
- Utilization Rate - The average % of units that were utilized nightly over the course of the program year.
- Total Income (Cash) - The % of persons age 18 and older who maintained or increased their total cash income (employment or entitlement income) as of the end of the operating year or program exit.
- Mainstream Benefits (Non-Cash) - The % of households that maintained or increased their non-cash benefits as of the end of the operating year or at program exit.
- Employment - The % of persons age 18 through 61 who maintained or increased their earned income as of the end of the operating year or program exit.
- Grant Spending - % of grant funds expended in most recently completed operating year.

### **Permanent Supportive Housing**

- HMIS – Is this project following the Standards for Participation in the El Paso Homeless Management Information System (HMIS) AND the El Paso Homeless Management Information System User Agreement?
- Permanent Housing Placements - The % of persons who remained in the permanent housing program as of the end of the operating year or exited to permanent housing (subsidized or unsubsidized).
- Utilization Rate - The average % of units that were utilized nightly over the course of the program year.
- Total Income (Cash) - The % of persons age 18 and older who maintained or increased their total cash income (employment or entitlement income) as of the end of the operating year or program exit.
- Mainstream Benefits (Non-Cash) - The % of households that maintained or increased their non-cash benefits as of the end of the operating year or at program exit.
- Grant Spending - % of grant funds expended in most recently completed operating year.

### **Supportive Services Only & Street Outreach**

- HMIS – Is this project following the Standards for Participation in the El Paso Homeless Management Information System (HMIS) AND the El Paso Homeless Management Information System User Agreement?



- Housing Placements - The % of persons placed into housing (Emergency Shelter, TH, or PH) as a result of supportive services during the operating year.
- Total Income (Cash) - The % of persons age 18 and older who maintained or increased their total cash income (employment or entitlement income) as of the end of the operating year or program exit.
- Mainstream Benefits (Non-Cash) - The % of households that maintained or increased their non-cash benefits as of the end of the operating year or at program exit.
- Employment - The % of persons age 18 through 61 who maintained or increased their earned income as of the end of the operating year or program exit.
- Grant Spending - % of grant funds expended in most recently completed operating year.

## **ESG Recipient Monitoring**

The Continuum of Care will work with ESG funders at the State, City and County level to coordinate the monitoring of outcomes of recipients of ESG funding. Grantee activities will be monitored to assure compliance with applicable Federal requirements and to determine whether or not performance goals are being achieved. The Continuum of Care will work with the State, City and County ESG funders to develop the performance standards and evaluate outcomes of ESG-funded projects.

## **Centralized or Coordinated Assessment Systems and Procedures**

The subrecipients must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD. The Policies and Procedures for the local Coordinated Access System( CAS) are contained in a separate document.

## **Administering CoC and ESG Rapid Re-housing Assistance**

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

1. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG and CoC RRH.
2. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.
3. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.
4. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.
5. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.
6. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.

## Policies and Procedures

### Evaluating Client Eligibility (CoC & ESG)

Requirements for all program participants whether homeless or at risk of homelessness.

1. Evaluations: Agencies providing assistance must provide an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG and CoC assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the CoC centralized or coordinated assessment requirements and the agency Policy and Procedures. Evaluation documentation must be kept in client file. Agencies should have a process in place to refer persons ineligible for ESG and CoC assistance to the appropriate resources or service provider that can assist them.
2. Income Eligibility: Individual or household must be
  - a. At or below 30% of the Area Median Income (AMI) for ESG funded programs
  - b. At or below 30% of the Area Median Income (AMI) for CoC funded programsAMI limits are available on HUD's web site at: <http://www.huduser.org/DATASETS/il.html>.
3. Housing Status: The household must be either at risk of homelessness (for prevention assistance) or homeless (for rapid re-housing assistance). Housing status documentation must be kept in client file.

### Coordination Policies and Procedures

- A. Consultation with ESG Funders: El Paso Coalition for the Homeless will consult with the City of El Paso to provide input on allocating ESG funds; developing performance standards; evaluating project outcomes; and implementing procedures for the administration and operation of HMIS.
- B. Coordination with Other Targeted Homeless Services: El Paso Coalition for the Homeless will coordinate and integrate ESG funded activities to the maximum extent practicable with other programs targeted to the homeless people in the El Paso area.
- C. Coordination with Mainstream Resources: El Paso Coalition for the Homeless will coordinate and integrate ESG funded activities, to the maximum extent practicable, with mainstream housing, health, social services, employment, education, and youth programs.
- D. Centralized or Coordinated Assessment: El Paso Coalition for the Homeless members, ESG and CoC funded programs will participate in the coordinated assessment system.

### Prioritizing Services among Eligible Clients

- A. After consulting with CoC and ESG service providers receiving ESG and CoC client assistance funds, the CoC will identify any client categories that need to receive preference in utilizing limited ESG and CoC assistance. Such preferences are to be used as guidance and not to eliminate any eligible person or households deemed most appropriate by the service provider who has immediate and detailed knowledge of their specific clients' circumstances.
- B. CoC preference is to assist both individuals and families with homelessness prevention and rapid re-housing assistance.
  - a. RAPID REHOUSING: First time homeless individuals and families who can effectively utilize ESG or CoC assistance to prevent a reoccurrence of homelessness. This is to be determined after an assessment by the case manager in consultation with the supervisor.

- b. **HOMELESS PREVENTION:** Households who are at imminent risk of losing current housing and in need of immediate assistance to avoid moving into an emergency shelter.
- c. To identify families who are most at risk of homelessness El Paso Coalition for the Homeless will consult with CoC and ESG service providers to determine the combination of characteristics that best describe individuals and families living in shelters or on the street. These combinations of characteristics will serve as a guide for targeting and prioritizing prevention assistance to individuals and families most in need.
  - i. The household lacks the financial resources to remain in its existing housing and has an eviction notice from the landlord.
  - ii. No appropriate subsequent housing options have been identified.
  - iii. The household lacks support networks necessary to remain in existing housing.
  - iv. Existence of two or more risk factors including but not limited to the following: doubled up, single-parent, loss of income in the last 90 days, disability, large family size.
  - v. Potential impact. Would short term assistance make a difference for the client, resulting in a more stable situation in the near term?

## Client Cost Sharing

Individuals and families receiving ESG homelessness prevention and ESG and CoC rapid re-housing assistance will be required to pay 30% of their household income toward rent. Participating individuals and families will be required to provide verification of all household income.

## Standards on Length & Amount of Rental Assistance

- A. Short-term and medium-term rental assistance: An eligible individual or family may receive up to 24 months of rental assistance during any 3-year period. Short-term rental assistance is for up to 3 months of rent. Medium-term rental assistance is for more than 3 months but not more than 24 months of rent.
  - a. Flexibility: Subgrantees have the flexibility to determine the amount of rental assistance provided.
  - b. Needs based: Assistance should be “needs-based” providing the minimum amount needed to prevent the program participant from becoming homeless or returning to homelessness in the near future.
  - c. Security and utility deposits: Subgrantees have the discretion to determine how to handle security and utility deposits. If the Subgrantee recovers a deposit, it must be treated/reported as program income.
- B. Rental arrears: This assistance may include payment of rental arrears consisting of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
- C. Re-evaluation: Program participant’s eligibility and the types and amounts of assistance the program participant needs must be re-evaluated not less than once every 3 months for prevention assistance, and not less than once annually for rapid re-housing assistance. At a minimum each re-evaluation of eligibility must establish that:
  - a. The program participant needs to show progress in establishing income beyond initial AMI eligibility. If this criterion is not met, the case manager must document the extenuating circumstances and obtain a waiver from their supervisor AND
  - b. The program participant lacks sufficient resources and support networks necessary to retain housing without ESG or CoC assistance
  - c. Each program participant must notify the agency regarding changes in their income or other circumstances (e.g., changes in household composition) that affect the participant’s need for ESG

or CoC assistance. When notified, agency must re-evaluate the participant's eligibility and amount and types of assistance needed

- D. Termination of Housing Assistance: The subgrantee may terminate assistance to a program participant who violates program requirements. In terminating assistance to a program participant, the subgrantee must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law. This process, at a minimum, must consist of:
- a. Written notice to the program participant containing a clear statement of the reasons for termination
  - b. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision
  - c. Prompt written notice of the final decision to the program participant.

## Standards for Housing Stabilization/Relocation

- A. The type of supportive services offered will be determined during an initial assessment of the family and tailored to individual barriers and needs. Eligible families will receive supportive services for the duration of the rental assistance. Such services can also be extended beyond the rental assistance period. A family needs to be meeting the goals set by the family and case manager in order to be reassessed for additional months of service.
- B. Housing Stabilization and Relocation Services: ESG or CoC funds may be used for services that assist program participants with housing stability and placement. Eligible activities include:
- a. Case management
    - i. ESG or CoC case management funds may be used for activities for the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of program participants and helping them obtain housing stability.
    - ii. Component services and activities may include:
      1. Counseling;
      2. Developing, securing, and coordinating services;
      3. Monitoring and evaluating program participant progress;
      4. Assuring that program participants rights are protected;
      5. Developing an individualized housing and service plan, including a path to permanent housing stability subsequent to ESG or CoC financial assistance.
  - b. Housing search and placement
    - i. ESG or CoC housing search and placement funds may be used for services or activities to assist individuals or households in locating, obtaining, and retaining suitable rental housing. These may include:
      1. Tenant counseling
      2. Assisting individuals and households to understand leases;
      3. Securing utilities

## ESG Administration

The CoC's Collaborative Applicant will administer the ESG funds that the CoC receives from Texas Department of Housing and Community Affairs (TDHCA).

El Paso CoC will maintain written policies and procedures that document:

1. Budgeting the costs to the Collaborative Applicant of administering ESG funds from TDHCA

2. Allocating ESG funds, including ESG funds for administrative costs and for HMIS
3. Selecting ESG sub-sub recipients (TDHCA is the ESG recipient, the Collaborative Applicants are the sub recipients, and entities under the Collaborative Applicant are sub-sub recipients)
4. Training and monitoring sub-sub recipients
5. Collecting performance and expenditure data from sub-sub recipients and aggregating it to reflect all State ESG programs within the CoC
6. Reporting performance and expenditure data to TDHCA
7. Receiving reimbursements from TDHCA and disbursing reimbursements to sub-sub recipients

## **Collaborative Applicant Costs**

In consultation with the CoC Committee of the Board the Collaborative Applicant will develop a budget that itemizes and details grant administration costs. The Board of the CoC Collaborative Applicant will approve the final budget.

## **Allocation of Emergency Solutions Grant (ESG) Funds**

Priority is given to programs that:

1. Benefit chronically homeless persons, meet the needs of local communities, are cost-effective, have participation by the public and private sector, are part of the Continuum of Care process and address problems of health, safety, and welfare.
2. Move persons experiencing homelessness from shelters and off the streets into decent, safe, and affordable housing and provide supportive services to promote housing retention and improve or maintain quality of life.
3. Funding allocation will include costs associated with HMIS implementation.

## **Selection of ESG Sub-Sub Recipients**

1. Applicants must actively participate in community-wide planning efforts to ensure the strategic use of resources by all providers of homeless services.
2. Prior to submitting an application, applicants must discuss their proposed ESG projects with their CoC Lead and must submit with their application completed “Certificate of HMIS Usage”, “Certificate of Participation”, and “Certification of CoC Coordination” documents.
3. Applicants shall ensure the following housing services for individuals/families are available:
  - a. For those homeless individuals and families in need of housing, appropriate housing that meets the needs of the homeless individual or family (e.g., rapid re-housing, permanent housing, permanent supportive housing, or single-room occupancy), combined with supportive services, shall be provided to maintain residential and personal stability (e.g., subsidized rent, case management services, nursing care, mental health care management, substance abuse treatment).
  - b. For those homeless individuals or families placed in rapid re-housing, permanent housing or permanent supportive housing, ESG recipients/sub-recipients shall assist the client in locating suitable, affordable housing, assist with housing applications and lease negotiation, application fees, first and last month's rent, short-term rental subsidies, furniture stipends, utility deposits, back payments, emergency payments, start-up household supplies and furnishings, start-up food and grocery supplies, transportation assistance, and clothing, when necessary or applicable.

- c. For homeless individuals or families placed in emergency shelters, rapid re-housing, permanent housing, permanent supportive housing, single-room occupancy, or affordable housing, ESG recipients/sub-recipients will ensure housing is safe and decent, meeting housing quality standards established by the Federal regulations.
- 4. Recipients/sub-recipients shall provide quality supportive services that meet accepted standards of care. At minimum, recipients/sub-recipients must provide or have access to the following supportive services:
  - a. Participate in a coordinated outreach and intake system that serves homeless individuals and families designated by the CoC
  - b. Perform a comprehensive, coordinated assessment of current psycho-social, health (including mental health and substance use/abuse), and employment/education conditions
  - c. Perform an individualized service/treatment plan developed for all clients describing a client's needs for supportive services and, if necessary, establishing a service/referral plan
- 5. Provide minimum supportive services that will include, but not be limited to:
  - a. Comprehensive assessment upon enrolling into the ESG Program
  - b. Case management of individuals and family members enrolled in an ESG program that includes home visits to ensure housing stability and address the needs of their clients and provide the level of service expected of ESG funded case management
  - c. Assistance for enrolling in benefit programs
  - d. Medical and mental health treatment
  - e. Substance abuse treatment
  - f. Education/vocational training
  - g. Job counseling/ training/job placement
  - h. Child care
  - i. Transportation necessary to maintain permanent housing
- 6. All sub-recipients are expected to provide appropriate level of supportive services to clients for the full time necessary to stabilize that client and provide for the likelihood of positive housing outcomes after assistance. A client is eligible to receive assistance up to the full 24 months in a 3 year period as determined by the certification process required for all ESG clients.

## Program Training and Monitoring

The proposed outcomes below are developed from HMIS data elements and will be used as the basis for monthly performance reporting. At minimum, applicants will be evaluated based on their performance against these outcomes.

- 1. Street Outreach
  - a. Number of persons placed in shelter or Safe Havens
  - b. Number of persons with more non-cash benefits at program exit
  - c. Number of persons receiving case management
- 2. Emergency Shelter
  - a. Number of persons exiting to temporary/transitional housing destinations
  - b. Number of persons exiting to permanent housing destinations
  - c. Number of persons receiving case management
- 3. Homeless Prevention
  - a. Number of persons who maintained their permanent housing for three months
  - b. Number of persons exiting to permanent housing destinations
  - c. Number of persons with higher income at program exit
  - d. Number of persons with more non-cash benefits at program exit
  - e. Number of persons receiving case management
- 4. Rapid Re-housing
  - a. Number of persons who maintained their permanent housing for three months

- b. Number of persons exiting to permanent housing destinations
- c. Number of persons with higher income at program exit
- d. Number of persons with more non-cash benefits at program exit
- e. Number of persons receiving case management

## **Collecting Performance & Expenditure Data**

Collecting performance and expenditure data from sub-sub recipients and aggregating it to reflect all State ESG programs within the CoC. Monitoring will include the following which are federal requirements:

- Formal and advance notification of on-site visits
- Pre-visit preparation based on review of existing information
- Records related to monitoring reviews
- Review of sub-recipient Policy and Procedure Manual and requirements
- Assurance that ESG funds are being utilized as originally planned and are for the eligible activities
- Determination whether costs are properly classified and if spending limits on certain activities have been properly adhered to
- Review and check that financial regulations and management requirements are appropriately being followed e.g. financial records, reports or audits
- Assurance that program disbursements or drawdown funds are in compliance with all requirements
- Review of client record files
- Notation of any changes in the use of ESG funds or any other issues

## **Reporting Performance and Expenditure Data to TDHCA**

TDHCA requires monthly performance and expenditure reports to be submitted in the TDHCA Community Affairs Contract System before the 15<sup>th</sup> of each month which will be submitted timely by the HMIS Administrator.

## **Receiving Reimbursements from TDHCA & Disbursing to Sub-Sub Recipients**

Upon approval of funding and implementation of the programs funded under ESG, El Paso Coalition requires that partner agencies submit invoices for funding reimbursements no later than the 10<sup>th</sup> of each month. Each request for reimbursement is reviewed by the Coalition for eligibility of expenditures, accuracy, and documentation of eligible homeless status per the McKinney-Vento homeless definition.

Each request for reimbursement is reviewed by El Paso CoC Lead.

Reimbursement comes via direct deposit to the Coalition from TDHCA following approval of the expenditures reported in the Community Affairs Contract System.

## **Homeless Documentation**

### **Housing Status Determination (CoC & ESG)**

Each household served with financial assistance and/or housing and stabilization services must be determined to be either at risk of losing housing (Prevention) or homeless (Rapid Re-housing) through a housing status determination process that includes documentation of the household's current living situation.

#### At Risk of Homeless – Definition

##### 1. Category 1 – Individuals and Families:

###### a. An individual or family who:

- i. Has an annual income below 30% of area median family income for the area; AND
- ii. Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND meets one of the following conditions:
  1. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance; OR
  2. Is living in the home of another because of economic hardship; OR
  3. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
  4. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
  5. Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
  6. Is exiting a publicly funded institution or system of care; OR
  7. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Consolidated Plan.

##### 2. Category 2 - Unaccompanied Children and Youth:

- a. A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute.

##### 3. Category 3 - Families with Children and Youth:

- a. An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

#### Homeless – Definition

##### 1. Category 1 – Literally Homeless:

###### a. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- 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); OR
- iii. Is exiting an institution where (s) he has resided for 90 days or less AND who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

##### 2. Category 2 – Imminent Risk of Homelessness:

###### a. Individual or family who will imminently lose their primary nighttime residence, provided that:

- i. Residence will be lost within 14 days of the date of application for homeless assistance;
- ii. No subsequent residence has been identified; and



- iii. The individual or family lacks the resources or support networks needed to obtain other permanent housing
- 3. Category 3 – Homeless under other Federal statutes:
  - a. 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:
    - 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 the preceding 60 days; AND
    - iv. Can be expected to continue in such status for an extended period of time due to special needs or barriers
- 4. Category 4 – Fleeing/Attempting to Flee Domestic Violence:
  - a. Any individual or family who:
    - i. Is fleeing, or is attempting to flee, domestic violence;
    - ii. Has no other residence; and
    - iii. Lacks the resources or support networks to obtain other permanent housing
- 5. CoC Program Rapid Rehousing
  - a. Continuum of Care funds for Rapid Rehousing must serve households with children living on the streets or in emergency shelter.

## Income Determination and Documentation (CoC & ESG)

Each household served with financial assistance and/or housing and stabilization services must be determined to be below 30% of Area Median Income (AMI) through an income determination process that includes identifying the applicable AMI, documenting income, and calculating household income.

Through a written income determination process that includes identifying the applicable AMI, documenting income, and calculating household income, each household served with financial assistance and/or housing and stabilization services must be determined to be:

- below 30% of Area Median Income (AMI) at initial assessment (Prevention only)
  - at or below 30% at re-evaluation (both Prevention and Rapid Re-housing)
1. Income is determined by using the 24 CFR Part 5.609 definition of income (Section 8 or Housing Choice Voucher definition):
    - Gross annual income of all adult household members that is anticipated to be received during the coming 12 months
  2. Calculation of Income
    - Annualize hourly, weekly or monthly payment information as appropriate
      - CPD Income Calculator Link: <https://www.onecpd.info/incomecalculator>
    - Compare against Area Median Income (AMI)
    - Keep documentation in file
  3. Acceptable documentation (income evaluation form) must include the minimum requirements specified by HUD and completed by subrecipient (in order of preference):
    - Third Party – Source
      - Most recent statement by authorized income source (wage statement, unemployment compensation statement, public benefits statement, bank statement, etc.)
    - Third Party – Written (if Source documentation is unobtainable)

- Name of income source, and applicant name
  - Income amount and frequency
  - Contact information for authorized income source representative
  - Signed and dated by authorized income source representative
  - Third Party – Oral – (if 3rd Party – Written is unobtainable)
    - By phone or in person directly to intake worker staff
    - Name of income source, and applicant name
    - Income amount and frequency
    - Contact information for authorized income source representative
    - Name, title, telephone number, date and time of conversation
    - Signed and dated by ESG or CoC staff who obtained oral verification
    - Due Diligence by case worker of efforts to obtain 3rd Party Source/Written
  - Self-Certification (only if 3rd Party not available. Due Diligence required)
  - Must include amount of income received for the most recent period representing what program participant is reasonably expected to receive over the 3-month period following the evaluation.
  - Intake Observation is NOT APPLICABLE
4. Income Inclusions and Documentation:
- Earned Income (Wages, Salary, Tips, Fees, etc.) – Gross Income
    - Payment statement
    - Statement on income from employer/source of income
  - Self-Employment/Business Income – Net Income
    - Most recent Financial Statement
    - Can be monthly or annual depending on which best represents current state of business and income derived from business
  - Interest and Dividend Income
    - Most recent interest or dividend income statement
  - Pension/Retirement Income
    - Most recent benefit notice, pension statement or other payment statement from pension provider
  - Armed Forces Income
    - Excludes special pay for hostile fire
    - Payment statement
    - Statement of income from government official/agency
  - Unemployment and Disability Income
    - Most recent benefit or disability income notice from SSI, SSDI, Workers Comp
    - Statement from SSI, etc.
  - Public Assistance, including TANF
    - Most recent benefit or income notice from public assistance administrator
      - Excludes amounts designated for shelter, utilities, WIC, food stamps, child care.
    - Notice or Statement from public assistance administrator
  - Alimony and Child Support (regular contributions received from persons not dwelling with client household)
    - Court order
    - Bank statement of deposits/canceled checks
  - No Income Reported
    - Notice of employment termination
    - Self-Certification
5. Income Exclusions
- Income of children (job, payments rec'd for Foster Children or Foster Adults)

- Lump Sum Additions
    - Inheritance and Insurance Income, Capitol Gains and Settlements
  - Medical Expense Reimbursements
  - Income of Live-in Aides
  - Certain State payments (see 24 CFR 5.609)
  - Student Financial Aid
  - Armed Forces Hostile Fire Pay
6. Treatment of Assets
- Assets: Cash or material items that can be converted to cash quickly
    - Real or personal property
    - Investments (retirement accounts, 401K, 403B, Roth IRA, etc)
    - Includes assets that are owned by more than one person that allow unrestricted access to the potential program participant
  - When dealing with assets please note that the 24 CFR Part 5 definitions only address how assets should be dealt with for the purposes of calculating income. HUD has not established requirements for how assets are to be treated in determining whether the potential program participant has the financial resources for addressing their financial need and what, if any, of the household assets must be spent down to qualify for assistance.
  - Although households are NOT required to spend down their assets in order to be eligible for ESG assistance, assets should be taken into consideration when determining whether the household has other financial resources sufficient to obtain or maintain housing.
  - Client assets and how they were considered in determining eligibility should be documented in client file

Contact Information:

The El Paso Coalition for the Homeless is the Continuum of Care Lead Agency. The CoC Lead can be contacted by sending a message to

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