



Butte Countywide Homeless Continuum of Care

BUTTE COUNTYWIDE HOMELESS CONTINUUM OF CARE ALL MEMBER MEETING MINUTES

Monday, November 16, 2020

1:00 P.M. to 3:00 P.M.

Zoom Virtual Meeting Hosted by Butte County Employment & Social Services

COUNCIL MEMBERS PRESENT:

Anastacia Snyder, Catalyst Domestic Violence Services
Don Taylor, Butte County DESS Housing & Homeless
Emily Bateman, Youth for Change/6th Street
Eric Smith, City of Oroville
Joy Amaro, True North Housing Alliance
Lisa Currier, Homeless/Former Homeless Representative
Marie Demers, City of Chico
Marin Hambley, Stonewall Alliance
Sarah Frohock, Butte County Dept. of Behavioral Health
Tami Ritter, Butte County Board of Supervisors
Stephanie Hayden for Larry Hayden, Oroville Hope Center
Thomas Tenorio, Community Action Agency
Ed Mayer, Housing Authority of the County of Butte
Meagan Meloy, Butte County Office of Education
Alex Brown, Greater Chico Homeless Taskforce
Melissa Frohrip, Nation's Finest (formerly VRC)

COUNCIL MEMBERS ABSENT:

Mike Zucolillo, Town of Paradise
Scott Huber, City of Chico

CoC COORDINATOR:

Briana Harvey-Butterfield, DESS, Housing & Homeless

RECORDING:

Staci Parisi, Butte County DESS Housing and Homeless

OTHER ATTENDEES:

Armando Hernandez, VECTORS
Lydia Jimenez, Cal OES
Penny Mittag, Butte County DESS
Leslie Johnson, CHAT
Laura Cootsona, Jesus Center
Shelly Watson, Jesus Center
Nikki Balboa, Veteran's Administration

OTHER ATTENDEES CONT'D:

Ann Winters, Catalyst Domestic Violence Services
Brad Brunner, Caminar
Crystal Mourad, North Valley Housing Trust
Dawn Blackhorse, Butte College
Elisa Rawlinson, Butte County DESS H&H
Rachel DeLeon, Butte County DESS
Keesha Hills, OSCIA
Annie Terry, Oroville Rescue Mission
Suzi Kochems, City of Chico
Pahua Thao, Butte County DESS H&H
Caitlin Davis-Rivers, CHAT
Debbie Lucero, Butte County Board of Supervisors
Mary Jo Alonzo, City of Chico
Kathleen Sweeney, Supervisor Ritter's Office
Kelly Steinhauer, CHAT
Melody Proebstel, United Way of Northern California
Lu Ann Peitz, Butte County DESS H&H
Hillary Crosby, Caring Choices
Nancy Jorth, Youth for Change
Angela Dayberry, Oroville Rescue Mission
Deanna Schwab, Safe Space
Dennis Whitt, Veteran's Services Office
Debbie Villasenor, Housing Consultant
Ana Vicuna, Butte County Department of Behavioral Health
Larry Longwell, CSU Veterans Services
Meghan Johnson, Butte Glenn 211
Luann Manss, Coordinated Outdoor Assistance & Shelter
John Mitchell, Elijah House
LuAnn Peitz, Butte County DESS H&H
Ronnie Mullins, Butte County DESS H&H
Seana O' Shaughnessy, CHIP
Emily Lees, Chico State Basic Needs Program
Amber Benedict, CHAT
Mark Alvidrez, CHAT
Emma Jewett, Chico State Basic Needs Program

Tracey Stogsdill, Butte Glenn 211
Carolyn Nava, Disability Action Center

Lori LaRiviere

ORDER OF BUSINESS:

- 1. CONVENE MEETING AND ESTABLISH QUOREM:** The meeting was called to order by A. Snyder at 1:02 p.m. This meeting is being recorded. Roll call for Council Members was completed by A. Snyder. It was determined there is enough Council Members for a Quorum. No field introductions were done. If you would like your name listed as an attendee please type your name and agency in the chat box.
- 2. APPROVAL OF MINUTES:** A motion was made to approve the October 19, 2020 Council meeting minutes with the following corrections: 1) Item 6.H. should read “1161 housing units will be built in Butte County. All units will be low income, 247 Section 8 vouchers have been awarded to these projects” 2) First paragraph of item 8 should read “E. Smith reported that the Oroville Rescue Mission annexation was approved by LAFCO. The City of Oroville is looking forward to a county recordation date around November 1, 2020. Additionally, the City is considering making available to the Rescue Mission some land it owns adjacent to them.”

Motion: E. Mayer
Second: D. Taylor
Opposed: None
Abstain: None

- 3. 2021 COC MEETING CALENDAR:** B.H. Butterfield presented the 2021 CoC Council Meeting calendar, which includes two all member meetings (May and November). Meetings will continue to be hosted virtually until further notice. (Attachment A).
- 4. APPROVE COMMITTEE CHAIR AND VICE CHAIR POSITIONS:** B.H. Butterfield reported per the Governance Charter the CoC will approve chair and vice chair positions for each established committee. The current list of committee chair and vice chair positions was presented to the CoC Council for approval (Attachment B). B.H. Butterfield added that each committee has been tasked with creating a “purpose and description of roles and responsibilities” to be presented during the May all member meeting. B.H. Butterfield asked the CoC Council to vote to approve chair and vice chair positions as presented in Attachment B. A motion was made to approve the chair and vice chair committee positions with the caveat to add chair and vice chair names for the Households with Children Committee once these positions are secured.

Motion: D. Taylor
Second: M. Demers
Opposed: None
Abstain: None

5. CoC COUNCIL MEMBER NOMINATIONS AND ELECTIONS: B.H. Butterfield announced today is the yearly election for six open CoC council seats. The following nominations were received:

1. Anastacia Snyder representing Domestic Violence Advocates and Victim Service Providers
2. Annie Terry representing Faith Based Organizations and Homeless Services
3. Emily Bateman representing Youth Homeless Organizations and Youth Advocates
4. John Mitchell representing Faith Based Organizations and Homeless or Formerly Homeless
5. Keesha Hills representing Faith Based Organizations and Homeless Outreach and Mobile Support
6. Marie Demers representing CDBG, HOME, ESG, Entitled Jurisdictions, and Local Government Staff
7. Meagan Meloy representing School Administrators and Homeless Liaisons
8. Melissa Frohrip representing Veteran's Services

You must be a designated voting member to vote. There is one voting member designated from each CoC Agency. There is a HUD mandate to prioritize The Homeless or Formerly Homeless representative position on the CoC Council. Five selections from the other representative categories shall be made by each voting member. Please complete your ballot and submit via email during this meeting and the voting results will be reported at the close of the meeting.

At the conclusion of the meeting the following voting results were announced with the following elected council members:

1. John Mitchell
2. Anastacia Snyder
3. Emily Bateman
4. Keesha Hills
5. Meagan Meloy
6. Marie Demers

This is a 2 year term and will officially begin in January 2021.

6. POINT IN TIME UPDATE: B.H. Butterfield reported that the PIT Committee has been meeting regularly to hone in on the best approach to methodology this year. Unsheltered survey questions and methodology will be brought to the CoC Council in December for approval. Recent HUD direction states that the 2021 HIC will be conducted as normal, the 2021 Sheltered Count will be conducted as normal, and CoC's may conduct the Unsheltered Count utilizing the following COVID 19 safety basics: decrease face to face interaction with clients, decrease number of volunteers who need to work in physical proximity, provide PPE for volunteers, design volunteer processes that minimize close contact. CoC's may also request and exemption to completing the Unsheltered Count, or can adjust their methodology to collect the data for the Unsheltered Count such as multiple count days or using observation only counts.

Question: D. Villasenor asked if there was any funding for PPE for volunteers for the Unsheltered Count.

Answer: B.H. Butterfield stated this was not called out in the PIT guidance, but COVID funding could be used for this purpose.

Question: E. Mayer asked if the PIT committee has a feel if the PIT Unsheltered count will be done in person.

Answer: B.H. Butterfield stated that the committee is leaning toward safe face to face interactions and using “professionals” such as homeless service providers who are familiar with PPE that needs to be worn. The committee has also discussed using alternative means to collect data such as making phone calls to collect data.

Question: T. Ritter stated that the Governor made an announcement today regarding COVID and asked if the PIT committee is incorporating latest direction from the State into the PIT count plan.

Answer: B.H. Butterfield stated the direction from the State will be considered in making PIT decisions.

D. Villasenor stated that the PIT Count is important for our CoC as many of our funding allocations are based on our PIT numbers.

7. APPROVAL OF UPDATED HMIS POLICY AND PROCEDURES MANUAL: S. Parisi reported that the HMIS/CE Committee has approved and recommends the Council approve and adopt the presented updated HMIS Policies and Procedures Manual (Attachment C). Background: On May 5, the Housing and Homeless Team participated in a Technical Assistance training on HMIS Data Privacy and Security. The TA was provided by TAC, Technical Assistance Collaborative. Based on information received in the training, the HMIS/CE Committee recommends the implementation of the following procedures:

- 1) Eliminate the Client Acknowledgement Form.
- 2) Adopt a universal Public Notice Form for all HMIS partner agencies which generally explains the reason for data collection.
- 3) Adopt a universal Privacy Notice for all HMIS partner agencies which clearly states the CoC’s privacy standards for HMIS.

S. Parisi reported that a consent to collect and enter data into HMIS is not required if the uses and disclosure purposes of Protected Personal Information (PPI) are clearly listed in the Privacy Notice. HUD gives providers the authority to use and disclose client PPI for the purposes outlined in the Privacy Notice without client consent. Any uses and disclosures of PPI not outlined in the Privacy Notice require client consent.

Updates to the HMIS Policy and Procedure Manual include updated Roles and Responsibilities to reflect current practices, and updated Privacy Plan to reflect new privacy practices and processes.

Question: A. Snyder asked about the diagram for the Change Management Plan, and stated that CoC Council final approval is not included in the diagram.

Answer: S. Parisi stated that the Change Management Workflow diagram will be updated to include the CoC Council final approval step.

A motion was made to approve the updated HMIS Policy and Procedure as presented.

Motion: T. Ritter
Second: M. Frohrip
Opposed: None
Abstain: None

S. Parisi stated that the changes to the HMIS Policy and Procedure Manual will be trained on at the HMIS/CE Committee meeting and the CHO Agreements will be updated to reflect the updated Policy and Procedures Manual.

8. APPROVAL OF LGBTQ AND PEOPLE OF COLOR (POC) SUBCOMMITTEE: B. H. Butterfield reported that adding a new subcommittee for LGBTQ and POC was brought to the council in September. The CoC Lead Agency conducted research and received technical assistance in this matter, and have outlined the findings of the research and resulting recommendations in the memo dated November 13, 2020 (See Attachment D). The CoC Lead Agency makes the following recommendations to the CoC Council:

- 1) Although no other CoC has established a committee pertaining to LGBTQ and People of Color specifically, it would be fair to proceed with the development of a new subcommittee that addresses the barriers that these marginalized groups may experience in obtaining homeless resources. This committee must be approved by the CoC Council and must follow the CoC Committee guidelines as set forth by the Butte CoC Governance Charter.
- 2) In accordance with the information provided by HUD Technical Assistance, the CoC Lead Agency/HMIS Lead, recommends that no Coordinated Entry priority points be given based on a protected class. However, the CoC should continue to partner with organizations that provide services to underserved populations, such as LGBTQ and People of Color.
- 3) The CoC should continue to follow, and update when necessary, existing non-discrimination policies and continue to include non-discrimination policies as a requirement of partner agencies that receive CoC funding.

A motion was made to approve the establishment of an LGBTQ and POC Committee and implement all three suggestions from the CoC Lead Agency.

Motion: M. Demers
Second: M. Hambley
Opposed: None
Abstain: None

B.H. Butterfield will send out a notice to all CoC members regarding participation in this new committee.

9. COVID REHOUSING TEAM (CRT) UPDATE: E. Rawlinson reported that Angela Dayberry from Oroville Rescue Mission and Marin Hambley from Safe Space will report on CRT success stories.

Angela Dayberry from Oroville Rescue Mission reported on a client that came to the mission in October 2019. The client was displaced from her current home because of a family dispute. She ended up homeless sleeping under a

big rig. A good samaritan found her and brought her to the mission. While at the mission she was diagnosed with stomach cancer and muscular dystrophy. Due to her health and age she qualified for PRK. Having her own space allowed her to tend to her healthcare needs and was able to pursue housing options. She has obtained a trailer and placed her trailer at a safe park in Chico near her son. She has had positive outcomes from the PRK project.

Marin Hambley shared that she worked with a couple from PRK who were recently housed. One of the individuals had a full time job but was spending all of her money on hotel rooms. Due to her partner's health condition they qualified for PRK. The Safe Space case managers assisted the couple in securing a one bedroom apartment and the couple is very happy and thriving in their housing placement.

E. Rawlinson shared another positive outcome of the CRT. A family in PRK entered because client was COVID positive and her four children were exposed. Prior to entering PRK the client was connected with True North and CalWORKs, while in PRK the client was able to find and secure housing with the help of the CalWORKs Housing Support Program (HSP). The client and all agencies involved worked really hard to get moved in and set up in the apartment. The client, HSP, True North, Caminar, the Housing Navigators, and the CRT move in team coordinated efforts to assist the client to get into her apartment within 24 hours, including moving her furniture from her storage unit into the apartment, and purchasing groceries for the family.

10. HEAP FUNDING REALLOCATION: D. Taylor reported that as we move through the last year of the HEAP funding the spending is being monitored closely because we want to make sure the funding is expended within our County and not given back to the State. One of the HEAP grantees will be unable to expend a portion of their grant, potentially \$275,000 - \$300,000 that will be unencumbered. D. Taylor stated the initial hope was to recommend to the CoC Council that the unencumbered funds be awarded to the existing HEAP TNHA/Safe Space contract, as they are working through emergency shelter solutions. However, due to site control concerns this will not be the recommendation. The plan is that by the December CoC meeting or during a special meeting before then, a recommendation will be made for utilizing the unencumbered HEAP funding.

T. Ritter asked at what point will we get a contract with an agency to provide a rotating emergency shelter in the faith based community? This is something that needs to get going. Who is currently working on this?

D. Taylor stated that this requires coordination with Safe Space. There is an existing HEAP contract in place for the Safe Space shelter. D. Schwab stated that Safe Space is still looking for space and have revisited faith based entities to stay at 30, 60, or 90 days. D. Schwab met with S. Kochems and J. Amaro met to discuss this yesterday. D. Schwab stated that churches have been used in the past for this purpose because they are exempt from having sprinklers. S. Kochems checked with the City of Chico and recommended that D. Schwab contact Tony Lindsay with City of Chico who told D. Schwab that any building that shelters people overnight, including churches, must have sprinklers. D. Schwab stated that that was never a problem in the past, and was told by Tony Lindsay that in the past Safe Space did not ask about this.

L. Cootsona stated that many churches do have sprinklers because of codes. H. Crosby stated that she has a current project going that this funding may be used for. E. Smith states that outreach to faith based service may be helpful to let them know there is a need. J. Mitchell states they have been operating a COVID 19 shelter facility in Lake County at the Juvenile Hall, and the Public Health officer waived the requirements because of the emergency. S.

Kochems says she will talk with the fire marshal to see if any exceptions can be made. D. Taylor will set up an ad hoc meeting sometime this week to address this with anyone who is interested.

A. Snyder stated that it would be good to get this positive news out into the public, to see the coordination that has been occurring.

11. COUNTY UPDATE: D. Taylor reported:

- a) HUD CoC homeless funds will be reallocated to existing awarded agencies.
- b) Project Room Key currently has 134 FEMA qualified persons in hotels and 34 an additional caretakers. PRK continues to operate on a month by month basis. Many other counties have been wrapping up their PRK projects. PRK has been successful in getting individuals housed as they exit PRK.
- c) HHAP 2.0 NOFA was released on Friday. Pot of money for the CoC and pot of money for the County. The CoC can redirect its allocation to the County as the Administrative Entity. The CoC Lead Agency recommends the CoC redirect their allocation to the County so there is only one application to be completed, rather than two. The CoC Council will vote on this later this week. The notification is due to the State by November 23rd. The application will be available November 30 and we will have 60 days to submit the application.
- d) The HMIS team submitted the 2019 and 2020 Longitudinal Systems Analysis upload into HDX 2.0.

12. COMMITTEE REPORTS:

Governance Committee: B.H. Butterfield reported that committee will meet in December.

Chronic Homeless Committee: J. Mitchell reports the committee met last month and another meeting is scheduled for tomorrow. The group is looking at immediate solutions for the needs of chronically homeless in our County, specifically land use suitable for campgrounds or tiny home villages. They hope to have something to present to the Council in December.

HMIS/CE Committee: S. Parisi reported the committee met on November 9th and continues to provide monthly training during the meeting, and has been working on updating the HMIS Policies and Procedure Manual.

Runaway Homeless Youth: E. Bateman reported that November is Homeless and Runaway Youth Awareness month. Activities include a fundraiser with Pedal Press for masks and t shirts, proceeds of purchases go directly to youth. This week is the light up the night event where people or businesses put a green light in their window to shine a light on youth homelessness. Next meeting is Wednesday at 12:30.

Veterans Committee: M. Frohrip stated the committee is meeting on Wednesday at 2:00 p.m.

Greater Chico Homeless Chico Task Force: No report.

Households with Children: S. Parisi announced that this committee is reconvening in January. The committee needs a chairperson to coordinate the meetings.

13. ANNOUNCEMENTS:

E. Mayer stated HACB is working on the Coordinated Entry (CE) Voucher project. HACB is seeing vouchers going to individuals selected from the CE list. HACB is offering a \$500 landlord incentive to all landlords who lease to a Section 8 Voucher holder.

A Brown reported the Greater Chico Homeless Taskforce is meeting is Thursday from 10-12. There will be a presentation from Youth for Change and discussion around winter sheltering options.

B. H. Butterfield announced that the Coalition appointments end December 31, please email B.H. Butterfield with your representatives for the next two years: Greater Oroville Coalition, Greater Chico Homeless Taskforce, Paradise Homeless Taskforce.

D. Villasenor reported in regards to the No Place Like Home project Creekside Place, CHIP was successful in their application and has been awarded low income disaster tax credits, and CHIP has signed their notice of intent with their investor. Start construction in spring 2021, and rent up in 2023.

9. NEXT MEETING:

Monday December 14, 2020, Butte County Department of Employment and Social Services to host Zoom Virtual Meeting.

10. Adjourned: 2:53 p.m.

ATTACHMENT A

BUTTE CoC 2021 COUNCIL MEETING SCHEDULE

<u>Proposed DATE</u>	<u>CONFLICTS</u>	<u>CHANGES/NOTES</u>	<u>LOCATION</u>	<u>TIME</u>
January 11	Holiday	Change from January 18	Virtual	1:00pm to 3:00pm
February 8	Holiday	Change from February 15	Virtual	1:00pm to 3:00pm
March 15	None		Virtual	1:00pm to 3:00pm
April 19	None		Virtual	1:00pm to 3:00pm
May 17	None	All Member Meeting	TBD	1:00pm to 3:00pm
June 21	None		TBD	1:00pm to 3:00pm
July 19	None		TBD	1:00pm to 3:00pm
August 16	None		TBD	1:00pm to 3:00pm
September 20	None		TBD	1:00pm to 3:00pm
October 18	None		TBD	1:00pm to 3:00pm
November 15	None	All Member Meeting	TBD	1:00pm to 3:00pm
December 13	Holiday Week	Change from December 20	TBD	1:00pm to 3:00pm

Location(s):

1) Virtual

Hosted by Butte County Department of Employment and Social Services (DESS). Invite sent monthly.

If In-Person Meetings Resume in 2021, locations will alternate between:

2) Oroville DESS Andes Room

78 Table Mountain Blvd., Oroville

3) Chico DESS Condor Room (Condor room located on the first floor near main entrance)

765 East Avenue, Chico (North Valley Plaza)



Butte Countywide Homeless Continuum of Care

DATE: November 13, 2020

MEMORANDUM FOR: CoC Council Members

FROM: Briana Harvey-Butterfield
Program Manager, Housing and Homeless
Butte County Department of Employment and Social Services

SUBJECT: Approval of CoC Committee Chair and Vice Chair Positions

To comply with The CoC Governance Charter, which states that any CoC member can participate on a Committee and the CoC Council will approve a Chairperson and a Vice Chairperson, the Committees request Council approval for the following individuals:

<u>Committee:</u>	<u>Position:</u>	<u>CoC Member:</u>
1) Executive Committee	N/A	
2) Governance Committee	Chair Vice Chair	Briana Harvey-Butterfield Dawn Blackhorse
3) HMIS/CES Committee	Chair Vice Chair	Staci Parisi Sarah Frohock
4) Households with Children Committee	Chair Vice Chair	TBD TBD
5) Veterans Committee	Chair Vice Chair	Melissa Frohrip Dennis Whitt
5) Chronic Homelessness Committee	Chair Vice Chair	John Mitchell Elisa Rawlinson
6) Youth Homelessness Committee	Chair Vice Chair	Josh Indar Emily Bateman
7) Point in Time Committee	Chair Vice Chair	Briana Harvey-Butterfield Suzi Kochems
8) Review and Ranking Committee	N/A	

HMIS Policies and Procedures Manual

Butte Countywide Homeless Continuum of Care

Adopted April 20, 2015;
Latest revision adopted November 16, 2020

For use by the CoC Council, CoC Coordinator, HMIS Committee, HMIS Lead Agency, HMIS Software System Provider, Contributing HMIS Organizations, Partner Agencies, and all End Users

Revision History

Date Adopted	Version	Description of Changes	Approver
Apr 20, 2015	1.0	Initial document creation	CoC Council
Aug 22, 2016	1.1	Grammatik and formatting updates, omitted section on “Hidden/Closed Client Records”, clarified “Aggregate Data Release Criteria”	
Nov 5, 2018	1.2	Added definition of “at risk of chronic homeless” for No Place Like Home programs.	HMIS Committee
June 10, 2019	2.0	Added Change Management Plan, added Revision History page, added header to all pages, and minor formatting	HMIS Committee
November 16, 2020	3.0	Updated Data Quality Plan, Security Plan, and Privacy Plan. Update Roles and Responsibilities to reflect best practices.	CoC Council

Latest Changes Author:	Reviewed by:
Staci Parisi	HMIS Committee

Primary reason for change
Update Data Quality Plan, Security Plan, and Privacy Plan. Update Roles and Responsibilities to reflect best practices.

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I. Background

The U.S. Department of Housing and Urban Development (“HUD”) uses Homeless Management Information System (“HMIS”) data to inform homeless policy at the federal, state, and local levels. The HEARTH Act, enacted in 2009, requires that all recipients and sub-recipients of Continuum of Care (“CoC”) Program and Emergency Solutions Grant (“ESG”) funds participate in their CoC’s HMIS. The CoC Interim Rule (24 CFR 578) defines CoC HMIS responsibilities, including:

1. Selecting an HMIS software solution
2. Designating an eligible applicant to manage the HMIS (the “HMIS Lead Agency”)
3. Providing oversight for key HMIS policies
4. Working with the HMIS Lead Agency to ensure consistent provider participation
5. Ensuring the quality of HMIS data

In addition, the HMIS Proposed Rule (76 FR 22 76917) includes more specific HMIS requirements, including: the duties of the CoC; the duties of the HMIS Lead Agency; and security, data quality, privacy and technical standards.

With the Exception of Victim Service Providers defined by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA), all homeless assistance programs that are a part of the Continuum of Care must participate in the HMIS, whether or not the specific program receives direct funding from HUD or other federal agencies. A particular program (or part of a program, such as a subset of beds within a program) is considered “participating” in HMIS if, as a matter of general practice, the program makes reasonable efforts to record all the Universal Data Elements for all clients served and discloses these data elements to the HMIS Lead Agency at least once annually. Disclosure may occur by directly entering data in the HMIS, electronically transferring data to the HMIS Lead Agency, or through other means determined with the HMIS Lead Agency. Such an HMIS participant is called a “Contributory HMIS Organization (“CHO”)” in these HMIS Policies & Procedures.

The Butte Countywide Homeless Continuum of Care (“Butte CoC”) Governance Charter, adopted by the Butte CoC Council, requires that the Butte CoC designate a legal entity that is also a Continuum of Care Program eligible applicant to serve as the Homeless Management Information System (HMIS) Lead Agency. The HMIS Lead Agency maintains Butte County’s HMIS in compliance with HUD standards and coordinates all related activities, including training, maintenance and the provision of technical assistance to CHOs. More specific HMIS Lead Agency responsibilities are described in the HMIS Lead Agency Memorandum of Understanding (the “HMIS Lead Agency MOU”) between Butte County Department of Employment and Social Services (DESS) and the Butte CoC.

The Butte CoC *HMIS Policies and Procedures Manual* was created to outline how the Butte CoC will comply with the following regulations, standards and agreements: the HEARTH Act; CoC Interim Rule; HMIS Proposed Rule; HUD Data Standards (2014 HMIS Data Dictionary and 2014 HMIS Data Manual); Butte CoC Governance Charter; and HMIS Lead Agency MOU.

II. Definition of Terms

APR: Annual Performance Report

Butte CoC Council: The Butte CoC's governing body charged by the Butte CoC Governance Charter with planning and implementing HUD-funded efforts to end homelessness in Butte County

Butte CoC Governance Charter: The document that governs the roles, responsibilities and operations of the Butte CoC, Council, Committees, Lead Agency, Collaborative Applicant, and HMIS Lead Agency

CHO (Contributory HMIS Organization): An organization that enters data into the HMIS Software System in compliance with the CHO Participation Agreement and under the oversight of a CHO HMIS Administrator

CHO HMIS Administrator: A CHO staff person who is responsible for compliance with the CHO Participation Agreement and day-to-day operation of CHO data collection in HMIS

CHO Participation Agreement: An agreement entered into by the HMIS Lead Agency and CHO that describes the obligations and authority of the parties with regard to data collection, input, management and reporting

Client: A living individual about whom an Agency collects or maintains PII

CoC: Continuum of Care

End User: An employee, volunteer, affiliate, associate, and any other individual acting on behalf of a CHO or HMIS Lead Agency who uses or enters data into the HMIS Software System or another administrative database from which data are periodically uploaded to the HMIS

HIC: Housing Inventory Chart

HMIS: Homeless Management Information System

HMIS Committee: Committee established by the Butte CoC Council to provide support and recommendations to the Butte CoC Council regarding HMIS policies and procedures; composed of staff representing the Butte CoC and HMIS Lead Agency, and all CHO HMIS Administrators

HMIS Software System: An HMIS data management software program developed and serviced by an HMIS Vendor

HMIS Lead Agency: An organization designated by a CoC to operate the CoC's HMIS

HMIS Vendor: Contractor who provides support services for the operation of a CoC's HMIS by contract, including the HMIS Software System provider, web server host, as well as providers of other contracted information technology or support

HUD: U.S. Department of Housing and Urban Development

LSA: Longitudinal System Analysis

NOFA: Notice of Funding Availability

PPI: Protected Personal Information

PIT: Point in Time Count

Security Officer: A staff person within the HMIS Lead Agency, and each CHO, that is responsible for their agency's compliance with the Security Plan of this *HMIS Policies and Procedures Manual*.

III. Roles and Responsibilities

1. Butte CoC Council

The Butte CoC Council is responsible for HMIS Project oversight and implementation, which encompasses planning, administration, software use, managing HMIS Data in compliance with HUD HMIS Standards, and reviewing and approving all policies, procedures, and data management plans governing CHOs. More specific Butte CoC Council responsibilities are listed below.

- Designate a single information system as the official HMIS software for the geographic area.
- Designate an HMIS Lead.
- Approve all HMIS policies, procedures and operational agreements.
- Develop a Governance Charter which includes a requirement that the HMIS Lead enter into written HMIS Participation Agreements with each Contributing HMIS Organization (CHO) and such additional requirements as may be issued by notice from time to time.

2. HMIS Committee

The HMIS Committee is designated by the Butte CoC Council to provide support and recommendations to the Butte CoC Council related to the HMIS regulations and standards as set forth by HUD. The HMIS Committee consists of staff representing the Butte CoC and HMIS Lead Agency, and all CHO HMIS Administrators.

3. HMIS Lead Agency

The HMIS Lead Agency manages HMIS data in compliance with HUD HMIS Standards, collects and organizes HMIS data within a data management software program and provides HMIS administrative functions at the direction of the Butte CoC Council, and as further described in the HMIS Lead Agency MOU. Other principle responsibilities include:

Governance, Policy Development and Reporting

- a) Draft policies, procedures and standards in accordance with the CoC Interim Rule, Proposed HMIS Rule, and 2014 HUD HMIS Data Standards;
- b) Submit a security plan, data quality plan, and a privacy policy to the CoC for approval, to be updated as needed;
- c) Ensure implementation of policies, procedures and standards;
- d) Schedule and facilitate HMIS Committee meetings;
- e) Prepare the following data reports and analyses for review by the Butte CoC Council and for submission to HUD: PIT Count; LSA; HIC; unduplicated counts of clients served annually;

count of lodging units in the HMIS; and other reports as necessary to measure progress in meeting Butte CoC goals;

- f) Respond to CoC Council and HMIS Committee directives;
- g) Ensure participation by all programs serving homeless people in the HMIS;

System Administration and Security

- h) Serve as the applicant to HUD for grant funds to be used for HMIS activities in the CoC's geographic area, and enter into grant agreements with HUD to carry out HUD-approved activities, as further described in the HMIS Lead Agency MOU;
- i) Oversee the day-to-day administration of the HMIS;
- j) Manage the HMIS Software System Vendor and other HMIS Vendors in compliance with current HUD requirements and Proposed HMIS Rule technical standards;
- j) Retain copies of all contracts and agreements executed for HMIS administration;
- k) Designate a Security Officer responsible for ensuring compliance with applicable security standards, after conducting a criminal background check;
- l) Require persons with access to all HMIS records to undergo a background check;
- m) Keep all signed paper and electronic statements for a period of at least 3 years;
- n) Implement a policy and chain of communication for reporting and responding to security incidents;
- o) Develop a disaster recovery plan, which includes protocols for communication with staff, CoC and CHOs;
- p) Complete an annual security review;

CHO and End User Coordination

- q) Monitor and enforce compliance by all CHOs with HUD requirements and report on compliance to the CoC and HUD;
- r) Communicate HUD HMIS Standards updates to all CHO HMIS Administrators;
- s) Prepare and execute Participation Agreements with each CHO, which include:
 - a. The obligations and authority of the HMIS Lead Agency and CHO;
 - b. The requirements of the Security Plan with which the CHO must abide;
 - c. The sanctions for violating the Participation Agreement; and
 - d. Agreement that the HMIS Lead Agency and CHO will process Protected Identifying Information consistent with the agreement.
- t) Maintain contact list of all CHO HMIS Administrators and update CHO Participation Agreements as needed;
- u) Manage and maintain mechanisms for soliciting, collecting and analyzing feedback from End Users and CHO HMIS Administrators.
- v) Document technical issues experienced by End Users;

Training and Technical Assistance

- w) Develop and deliver a comprehensive training curriculum and protocol for CHO HMIS Administrators and End Users, as further described in the HMIS Lead Agency MOU;
- x) Provide technical assistance and support to CHO HMIS Administrators and End Users;

Data Quality

- y) Develop and implement the Data Quality Plan;
- z) Establish data quality benchmarks for CHOs (calculated separately for: emergency shelter, safe haven, transitional housing and permanent housing), including bed coverage rates, service-volume coverage rates, missing/unknown value rates, timeliness criteria, and consistency criteria;
- aa) Coordinate with CHO HMIS Administrators to produce required reports;

- bb) Run and disseminate data quality reports on a quarterly basis to CHO programs indicating levels of data entry completion, consistency with program model, and timeliness;
- cc) Provide quarterly reports on HMIS participation rates, data quality and other analyses to the Butte CoC Council and HMIS Committee;
- dd) Monitor compliance by all CHOs with HMIS participation requirements, policies and procedures, privacy standards, security requirements, and data quality standards through an annual review per the process outlined in the Participation Agreement;
- ee) Manage HMIS Software System upgrades and ensure that they comply with the latest HUD Data Standards; and
- ff) Distribute HUD Data Standards and provide guidance to CHOs on compliance.

4. Contributing HMIS Organizations (CHOs)

CHOs operate a provider program and contribute Protected Identifying Information to the HMIS Software System. CHOs must enter into and comply with CHO Participation Agreements in order to contribute such data to the HMIS Software System. Principle responsibilities described in this *HMIS Policies & Procedures Manual* include:

Data Quality

- a) Collect the universal data elements, as defined by HUD, for all programs operated that primarily serve persons who are homeless or at risk of homelessness;
- b) Collect program specific data elements, as defined by HUD, for all clients served by programs funded by HUD grants allocated to the Butte CoC;
- c) Enter client-level data into the HMIS within seven days of client interaction;
- d) Follow, comply and enforce the CHO Participation Agreement;

Security

- e) Designate the HMIS Administrator as the Security Officer that is responsible for ensuring Security Plan compliance for the CHO;
- f) Conduct criminal background checks, at a minimum based on a record review of the Superior Court records in the county of last residence, on the HMIS Administrator and all End Users;
- g) Ensure that all End Users receive security training prior to being given access to the HMIS, and once annually;

Privacy

- h) Uphold confidentiality requirements;
- i) Post the Butte Countywide HMIS Public Notice so that is viewable to all Clients;
- j) Post the Butte Countywide Continuum of Care Privacy Notice on its Agency's website; and

Training

- k) Participate in comprehensive training curriculum developed by the HMIS Lead Agency.

5. CHO HMIS Administrator

A CHO HMIS Administrator is designated by each CHO to oversee day-to-day operation of its HMIS data collection system, ensure program-level data quality according to the terms of the CHO Participation Agreement and associated Data Quality Plan, and manage data entry into the HMIS Software System. The CHO HMIS Administrator shall participate in HMIS Committee meetings and HMIS trainings. The

CHO HMIS Administrator shall:

- a) Be the first point of contact for End Users experiencing difficulties using HMIS;
- b) Maintain End User list within the CHO;
- c) Monitor End User logins on a monthly basis;
- d) Complete data entry when End Users are unable to complete data entry;
- e) Ensure CHO compliance with the protocols of the Data Quality Plan, Security Plan and Privacy Plan;
- f) Inform the HMIS Lead Agency when critical deadlines regarding data entry are missed;
- g) Maintain communication with the HMIS Lead Agency and HMIS Committee regarding HMIS data entry challenges and questions;
- h) Submit requests for new End Users of the HMIS Software System to the HMIS Lead Agency;
- i) Notify the HMIS Lead Agency when End Users no longer need access to the HMIS, so their HMIS user accounts can be deactivated;
- j) Complete training with the HMIS Lead Agency at least quarterly.

6. HMIS Software System Vendor

The HMIS Software System Provider licenses and manages the HMIS software used by the Butte CoC by contract. The Butte CoC also requires the HMIS Software System Provider to:

- a) Support the HMIS Lead Agency in providing training and technical assistance to the HMIS Lead Agency, CHO HMIS Administrators and End Users;
- b) Encrypt data at the server level; and
- c) Revise HMIS Software System Provider software at the HMIS Lead Agency's request in order to comply with HUD HMIS Standards.

7. End User

All HMIS End Users shall:

- a) Read, initial and sign the CHO End User Agreement;
- b) Complete a New User training with the HMIS Lead Agency;
- c) Complete training with the HMIS Lead Agency at least annually;
- d) Maintain security of login and work station;
- e) Follow data entry standards as required in the Data Quality Plan regarding completeness and timeliness;
- f) Follow protocols as required by the Security Plan and Privacy Plan;
- g) Enter client-level data into the HMIS within seven days of client interaction;
- h) Notify CHO HMIS Administrator if data deadlines appear to be in jeopardy; and
- i) Notify CHO HMIS Administrator with any questions, or if the HMIS Software System is not working properly.

IV. Data Quality Plan

1. Definition of Data Quality

Data quality refers to the extent that data recorded in the Butte CoC HMIS accurately reflects the same information in the real world. A perfect overlap between data and reality would result in a hypothetical data quality rating of 100%. While no data collection system has a quality rating of 100%, it is critical

that the system provides the best possible representation of reality as it relates to homeless people and the programs that serve them. The overall goal is to record the most accurate, consistent and timely information in order to draw reasonable conclusions about the extent and impact of homelessness. All data entered into the HMIS Software System must comply with HUD's 2014 HMIS Data Standards.

One of the most effective ways to collect quality data is to develop data collection and data entry standards that are consistently implemented by all organizations and users entering data into the HMIS Software System. These standards will ensure that data is entered in a timely and consistent manner throughout the Butte CoC. The procedures and standards described below apply to all CHOs and End Users. CHO HMIS Administrators are responsible for ensuring that their organization's staff adheres to these procedures and standards.

2. Data Collection

Data Elements - Data Elements are the specific pieces of information that CHOs collect from clients and enter into the HMIS Software System. HUD's 2014 HMIS Data Standards (as defined in the HUD Data Standards Manual, Data Dictionary and HMIS Project Descriptor Data Elements Manual) govern the collection and input of Data Elements. The HMIS Lead Agency, CHOs and End Users must adhere to HUD's 2014 HMIS Data Standards. HUD may revise these standards from time to time in the future, at which point this *HMIS Policies and Procedures Manual* will need to be updated. Reference to HUD 2014 HMIS Data Standard guidance documents are provided in Section VIII Resources at the end of this *HMIS Policies and Procedures Manual*.

There are two Data Element categories— Universal and Program Specific. Universal Data Elements must be entered for all clients, regardless of funding source. Unlike Universal Data Elements, HUD does not require that all Program Specific Data Elements be collected for each client. Each CoC determines which Program Specific Data Elements to collect. The Universal Data Elements and Program Specific Data Elements are described in the 2014 Data Standards Manual, including data collection instructions, data element fields and response category descriptions.

Unique Client Identifier - A unique client identifier will be assigned by the HMIS to each client. The unique client identifier will not contain, in whole or in part, any client personal information as listed under Universal Data Elements. The unique client identifier provides an unduplicated internal count of clients served by CHOs, and provides the HMIS Lead Agency and HMIS Committee the means of conducting longitudinal analysis of services provided to each client.

3. Data Timeliness

Universal Data Elements, as defined by HUD's 2014 HMIS Data Standards, should be collected by CHOs from all Clients at initial program enrollment. CHOs must enter data into the HMIS Software System within seven days of collecting the Client data elements. Program exit data should be entered on the same business day as exit. CHOs must enter data on all contacts made, including date of engagement in outreach services, and dates of enrollment for specific programs.

4. Data Accuracy

Data accuracy is almost wholly dependent on the End User entering the correct information. In some cases, consistency checks can catch these errors. But for the most part, it is the responsibility of the End User to ensure that what is entered into the HMIS Software System reflects reality.

In addition to unintentional errors, the possibility of the Client providing false information always exists. It is impossible to completely eliminate all instances of intentionally false information. There are certain strategies to build trust and emphasize the benefits of accurate data to Clients. A firm understanding of why a Client might provide false information, along with communicating to them the benefits of complete and accurate information, is a good start.

Reasons for providing false information:

- Privacy (not wanting to be tracked)
- Embarrassment/modesty
- A disability that results in paranoia
- Desire to qualify for service
- Fear of being turned away
- Not caring

Reasons for providing true information:

- Improved direct services
- Benefit eligibility and information validated
- Want to tell their story
- A relationship has been created
- Understand privacy/security procedures
- See benefits of HMIS for homelessness

End Users should attempt to assuage any Client anxiety about providing information by explaining how their PII is protected within the HMIS Software System.

5. De-Duplication Procedures

The HMIS Software System software will use the following data elements to create de-duplicated Client records:

- Name (first, middle, last, suffix, aliases or nicknames should be avoided);
- Social Security Number;
- Date of Birth (actual or estimated);
- Race and Ethnicity;
- Gender;
- Veteran's status; and
- Family status.

The primary way to achieve de-duplication will be a user-mediated search of the Client database prior to creating a new Client record. The End User will be prompted to enter a minimum number of the data elements into the HMIS application and a list of similar Client records will be displayed. Based on the results, the End User will be asked to select a matching record if the other identifying fields match correctly. If the End User is unsure of a match (either because some data elements differ or because of

blank information), the End User should query the Client for more information and continue evaluating possible matches or create a new Client record.

6. Data Validity

For the purposes of this Data Quality Plan, Data Validity refers to all End Users defining and interpreting data elements the same way. The HMIS Committee reviews the definitions for each data element during training and these definitions and any updates are discussed at End User training meetings. If any End User has a question regarding how to define or interpret a data element they should feel free to contact the HMIS Lead Agency for direction. Some of the more frequently misinterpreted data elements and response categories are explored below.

Veterans – Adults (18 years or older) who have served active duty in any branch of the military. This includes the National Guard, but only if they were called up for active duty. Era of service, duration of service, discharge status, etc. is required for programs that serve Veterans only.

Chronically Homeless - An unaccompanied homeless individual with a disabling condition or an adult member of a homeless family who has a disabling condition and who has either been continuously homeless for 1 year or more, OR has had at least four episodes of homelessness in the past 3 years.

At Risk of Chronic Homelessness - (No Place Like Home (NPLH))

Persons qualifying under this definition are persons who are at high-risk of long-term or intermittent homelessness. For the NPLH Program, this means an adult or older adult with a Serious Mental Disorder who meet one or more of the following criteria: (1) Persons exiting institutionalized settings, such as jail or prison, hospitals, institutes of mental disease, nursing facilities, or long-term residential substance use disorder treatment, who were *Homeless prior to admission* to the institutional setting; (2) Transition-Age Youth experiencing homelessness or with significant barriers to housing stability, including, but not limited to, one or more evictions or episodes of homelessness, and a history of foster care or involvement with the juvenile justice system; (3) Persons, including Transition-Age Youth, who prior to entering into one of the facilities or types of institutional care listed below had a *history of being Homeless* as defined under this subsection: a state hospital, hospital behavioral health unit, hospital emergency room, institute for mental disease, psychiatric health facility, mental health rehabilitation center, skilled nursing facility, developmental center, residential treatment program, residential care facility, community crisis center, board and care facility, prison, parole, jail or juvenile detention facility, or foster care.

Having a history of being Homeless means, at a minimum, one or more episodes of homelessness in the 12 months prior to entering one of the facilities listed above. As long as the requirements listed above are met, Homeless Persons who have resided in one or more of the settings described above in section 1 or section 3 for any length of time may qualify as Homeless upon exit from the facility, regardless of the amount of time spent in such facility; and Homeless Persons who prior to entry into any of the facilities or types of institutional care listed above have resided in any kind of publicly or privately operated temporary housing, including congregate shelters, transitional, interim, or bridge housing, or hotels or motels, may qualify as At-Risk of Chronic Homelessness.

Literally Homeless – An individual or family who lacks a fixed, regular and adequate nighttime residence, meaning the individual or family has a primary nighttime residence that is a public or private place not meant for human habitation or is living in a publicly or privately operated shelter designed to provide temporary living arrangements. This category also includes individuals who are exiting an institution where he or she resided for 90 days or less who resided in an emergency shelter or place not meant for human habitation immediately prior to entry into the institution.

Imminent Risk of Homelessness – an individual or family who will imminently lose (within 14 days) their primary nighttime residence provided that no subsequent residence has been identified and the individual or family lacks the resources or support networks needed to obtain other permanent housing.

Housing Needed to Resolve Homelessness – This element refers to what the client will need to become stably housed in the long term. If their homelessness was caused by a short-term gap in employment, then an emergency shelter stay until their income is re-established may be the correct response. If a client's barriers are more severe, on-going rental assistance or permanent supportive housing may be the correct choice.

V. Security Plan

The Butte Countywide Continuum of Care Security Plan specifically details Uses and Disclosures of Protected Personal Information (PPI). This Security Plan applies to all Partner Agencies within the Butte Countywide HMIS. When other federal or state privacy or security laws apply to an organization, the organization must comply with the requirements that provide the greatest protection for the client's PPI. If an agency is covered by the Health Insurance Portability and Accountability Act (HIPAA), the HIPAA regulations prevail.

1. Hardware, Connectivity and Computer Security

Partner Agencies must have Internet connectivity for each workstation accessing the HMIS. To optimize performance, all agencies are encouraged to secure a high speed Internet connection with a cable modem, DSL, or T1 line. Agencies expecting a very low volume of data may be able to connect using a dial-up connection; however, HMIS management cannot guarantee satisfactory performance with this option.

Access to the HMIS will only be allowed from computers and portable computing devices as specifically identified by the CHO's Executive Director (ED), Chief Executive Officer (CEO), or equivalent, and the CHO HMIS Administrator. Access to these workstations will be controlled through both physical security measures and a password. Each agency's CHO HMIS Administrator will determine the physical access controls appropriate for their organizational setting based on HMIS security policies, standards and guidelines.

All computers stationed in public areas that are used to collect and store HMIS data should be staffed at all times. When workstations are not in use and staff is not present, steps should be taken to ensure that the computers and data are secure and not usable by unauthorized individuals. Each computer must have password-protected screen savers. In addition, each workstation, where information access occurs, must have anti-virus and anti-spyware programs in use and properly maintained with timely installation of all critical updates to the operating system, web-browsers, and AV/AS software. Good examples of anti-virus software include McAfee and Symantec (Norton) Security systems, among others.

2. HMIS Lead Agency Implementation

Prior to setting up a new CHO to use the HMIS Software System, the HMIS Lead Agency shall:

- a) Verify that the required documentation has been correctly executed and submitted or viewed on-site, including:
 - Executed CHO Participation Agreement;
 - Designation of a CHO HMIS Administrator who will also serve as the Security Officer that is responsible for ensuring Security Plan compliance for the CHO;
- b) Request and receive approval from the HMIS Committee to setup a new agency;

- c) Provide initial training to the CHO HMIS Administrator and CHO End Users and
- d) Work with the CHO HMIS Administrator to input applicable agency and program information.

3. CHO Implementation

At a minimum, CHOs must develop rules, protocols or procedures to address the following:

- Posting the Butte Countywide HMIS Public Notice in locations where HMIS data is collected so that it is viewable to all Clients;
- Complying with the Butte Countywide Continuum of Care Privacy Notice the CHO Participation Agreement, the *HMIS Policies and Procedures Manual*, federal HMIS regulations, and HUD Standards;
- Maintaining and posting an updated copy of the Butte Countywide Continuum of Care Privacy Notice on the agency's website;
- Providing copies of the Butte Countywide Continuum of Care Privacy Notice to Clients, upon request;
- Appropriate assignment of End User accounts;
- Preventing End User account sharing;
- Protection of unattended workstations;
- Protection of physical access to workstations where employees are accessing HMIS;
- Safe storage and protected access to hardcopy and digitally generated client records and reports with identifiable client information;
- Proper cleansing of equipment prior to transfer or disposal; and
- Procedures for regularly auditing compliance with the *HMIS Policies and Procedures Manual*.

4. End User Implementation

Eligible End Users - Each CHO shall only authorize HMIS use to End Users who need access to the system for data entry and/or system administration purposes. Data entry includes entering client records, editing client records, viewing client records, or other essential activity associated with carrying out CHO Participation Agreement responsibilities. System administration includes items such as technical administration of the system, report writing, data analysis and report generation, and other essential activity associated with carrying out CHO Participation Agreement responsibilities.

Setting Up New End Users - If the CHO authorizes system use for a new End User, the CHO's HMIS Administrator shall:

- a) Review internal HMIS records about previous End Users to ensure that the new End User does not have previous violations of HMIS Policy and Procedure that prohibit access;
- b) Contact the HMIS Lead Agency to request an End User Agreement for the new End User;
- c) Have the new End User read, initial and sign the End User Agreement;
- d) Prepare a letter on Agency letterhead verifying a criminal background check has been completed on the new End User (letter must include the new End User's name, the date the criminal background check was completed, and be signed by the Agency's ED, CEO, or equivalent); and
- e) Forward the executed End User Agreement and verification of criminal background check to the HMIS Lead Agency.

The HMIS Lead Agency shall:

- a) Create the new End User account in the HMIS Software System;
- b) Contact the new End User to set up a New User Training;
- c) Provide the new End User with their HMIS Software System log in credentials at the time of the New User Training; and
- d) Manage End User accounts for the CHO, including removal of an End User's account access when it is no longer needed.

End User Requirements

Prior to being granted a username and password, End Users must complete the following:

- a) Participate in a criminal background check;
- b) Sign an HMIS End User Agreement that acknowledges receipt of the HMIS Policies and Procedures Manual and pledges compliance;
- c) Receive New User training with the HMIS Lead Agency, which includes awareness of the sensitivity of client-level data and appropriate measures to prevent its unauthorized disclosure; and
- d) Receive a unique user name and password that is kept confidential.

Passwords

Each End User will be assigned a User ID, preferably the first and last name of the user. A temporary password will be automatically generated by the system when a new End User is created. The HMIS Lead Agency will communicate the system-generated password to the End User. The End User must establish a new password upon initial login. This password will need to be changed every 90 days. Passwords should be between 8 and 16 characters long, contain at least two numbers, and should not be easily guessed or found in a dictionary. The password format is alphanumeric and is case-sensitive. End Users are prohibited from sharing passwords—even with supervisors. Sanctions will be imposed on the End User and/or CHO if End User account sharing occurs. Any passwords written down should be securely stored and inaccessible to others. They should not be saved on a personal computer. An End User may only attempt to enter his/her password four times before the system inactivates that End User account. An End User account can only be reactivated by the HMIS Lead Agency.

Password Reset

If an End User has forgotten his/her password or for other reasons needs it to be changed, he/she must contact the HMIS Lead Agency by phone or email to request a new password. A password given by the HMIS Lead Agency is a temporary password and after entered once must be changed immediately by the End User.

Changes to End User Accounts

Only the HMIS Lead Agency may make End User account changes. This includes adding or deleting an End User, changing passwords, and granting access to the Coordinated Entry Program in HMIS. . CHO HMIS Administrators should contact the HMIS Lead to request changes to an End User account.

5. System Inactivity

End Users must logoff from the HMIS Software System and their workstation if they leave the

workstation. HUD requires password protected screen savers on each workstation. If the End User is logged onto a workstation and the period of inactivity on that workstation exceeds 30 minutes, the End User will be logged off the HMIS Software System automatically.

6. Electronic Data Control

CHOs must establish protocols limiting internal access to HMIS data based on HUD Data and Technical Standards.

Raw Data - End Users who have been granted access have the ability to download and save client level data onto their local computer. Once this information has been downloaded from the HMIS Software System in raw format to a CHO's computer, this data then becomes the responsibility of the CHO. Any such data files should be password protected with a reasonable level of encryption to safeguard personal and protected information.

Ability to Export Agency Specific Data from HMIS - CHOs will have the ability to export a copy of their own data for internal analysis and use. CHOs are responsible for the security of this information.

Data Storage - The HMIS Lead Agency and CHOs must store HMIS data for a minimum of seven years on a secure server.

7. Enforcement Mechanisms

The HMIS Lead Agency and/or HMIS Committee will investigate all potential violations of any security protocols. Any End User found to be in violation of security protocols will be sanctioned.

Sanctions include, but are not limited to:

- A formal letter of reprimand
- Suspension of HMIS system privileges
- Revocation of system privileges

A CHO's access may also be suspended or revoked if serious or repeated violation(s) of this *HMIS Policy and Procedures Manual*, as adopted by the Butte CoC, occur by the CHO's End Users.

VI. Privacy Plan

The **Butte Countywide Continuum of Care Privacy Notice (Privacy Notice)** specifically details Uses and Disclosures of Protected Personal Information (PPI). This Privacy Notice applies to all Partner Agencies within the Butte Countywide HMIS. When other federal or state privacy or security laws apply to an organization, the organization must comply with the requirements that provide the greatest protection for the client's PPI. If an agency is covered by the Health Insurance Portability and Accountability Act (HIPAA), the HIPAA regulations prevail.

The **Butte Countywide HMIS Public Notice (Public Notice)** generally explains the reasons for collecting information in HMIS.

1. Client Notice

Each CHO must post the Public Notice in locations where HMIS data is being collected so that is

viewable to all Clients.

Each CHO must offer a copy of the Privacy Notice to Clients, and provide a copy upon request. If an agency maintains a public web page, the agency must post the Privacy Notice on its web page.

2. Client Consent

Consent of the Client for data collection in HMIS is inferred from the circumstances of the collection.

3. HMIS Data Uses and Disclosures

Once data is collected in HMIS, Partner Agencies have obligations about how that information is used and disclosed.

Uses are internal activities for which Partner Agencies interact with Client PPI.

Disclosures of PPI occur when Partner Agencies share Client PPI with external agencies.

HUD gives HMIS Partner Agencies the authority for the following uses and disclosures without the need to obtain Client consent as long as they are clearly articulated in the Butte Countywide CoC Privacy Notice. Uses and disclosures for the purpose of:

- Providing or coordinating services to an individual;
- Creating de-identified client records from PPI;
- Carrying out administrative functions (legal, audit, personnel, oversight and management functions); and
- Functions related to payment or reimbursement for services.

HMIS Partner Agencies are allowed (in some instances required) to disclose information in the following ways without Client consent, as long as they are clearly laid out in the Butte Countywide CoC Privacy Notice:

- Uses and disclosures required by law;
- Uses and disclosures to avert a serious threat to health or safety;
- Uses and disclosures about victims of abuse, neglect, or domestic violence;
- Uses and disclosures for research purposes; and
- Uses and disclosures for law enforcement purposes.

Uses and disclosures not listed in the Butte Countywide CoC Privacy Notice require the Client's consent.

Unaccompanied Minor Youth - The HMIS cannot be used to share information about unaccompanied minor youth outside of the originating agency. Thus, End Users cannot share any Client information of unaccompanied minor youth. For the purposes of this policy, minor youth are defined as youth under 18.

Domestic Violence (DV) Service Providers – DV Service Providers are prohibited from entering Client PPI into HMIS, and must use a comparable database.

4. Privacy Plan Compliance and Grievance Policy

CHOs must establish a regular process of training End Users on the Privacy Plan compliance and regularly audit that the Privacy Plan is being followed by CHO staff (including employees, volunteers,

affiliates, contractors and associates). CHOs must review any complaints about potential violations of the Privacy Policy.

VII. Change Management Plan

1. Proposal and Monitoring

- Proposal of a change must be made in the HMIS Committee by a Committee member, HMIS Lead agency, or HMIS System Administrator(s). Unless otherwise imposed by governing bodies for compliance, the HMIS Committee must agree to the proposal and further development of the change.
- The HMIS Committee takes responsibility for monitoring and setting criteria for methods and measures of success of a proposed change.

2. Analysis

- The HMIS Committee will identify and analyze scope, impact, and risk of proposed change, and take into account external factors which may impact or affect change feasibility, system stability, functionality, security, data quality, and/or data integrity.
- Appropriate measures must be identified and taken to avoid, mitigate, and/or appropriately account for risk.

3. Development and Testing

- The HMIS Committee will work with the HMIS Lead Agency and HMIS System Administrator(s) to translate the proposed change into system-specific software configurations.
- For non-software and procedural changes, HMIS Committee, HMIS Lead Agency, and HMIS System Administrator(s) will translate proposed change into applicable documentation, training, and/or resource materials.
- When issues arise that are counter to the desired intent or effect of the change, affect pre-existing functionality or impact system stability, these will be addressed in a revised plan prior to recommending for approval. Issues that challenge the feasibility of the change must be addressed with the HMIS Committee, Lead Agency, and HMIS System Administrator(s). The option to abandon a proposed change must be done prior to recommending for approval to the CoC Council, and must involve the HMIS Committee, HMIS Lead Agency, and HMIS System Administrator(s).
- Design and initial testing should first be done in a sandbox to limit risk of affecting production systems. Secondary and pilot testing can (but does not have to) take place on production systems in a limited way, with appropriate measures taken to limit unintended outcomes on the production system. Approval by the CoC Council (or ED/CEO/equivalent for agency-specific changes) is needed to proceed with further implementation.

4. Recommendation and Approval

- The HMIS Committee, HMIS Lead Agency, and HMIS System Administrator(s) must review and appraise the proposed change, then recommend to the CoC Council for approval. Context, value, risk, and impact should be included in the recommendation to the CoC Council. After approval is given by the CoC Council, related documents are updated as needed.
- If the scope of the change is limited to and applies to only one Partner Agency, the approval of only the agency's ED, CEO, or equivalent is required.

5. Update Documentation

- Upon approval to implement the proposed change, the applicable documents must be updated as necessary either prior or parallel to implementation. While not required, the updated documentation may be approved at the same time as the change by the CoC Council (or agency ED/CEO/equivalent, when applicable).
- In addition to the body of the documents being updated, these documents must have a revision date made clearly visible in a conspicuous part of the document and a running history of changes (aka Change Log) included in the document. This Change Log must display the date, version number (if versioning numbers are used), brief summary of change, approving body, author, reviewer, and a primary reason for change.

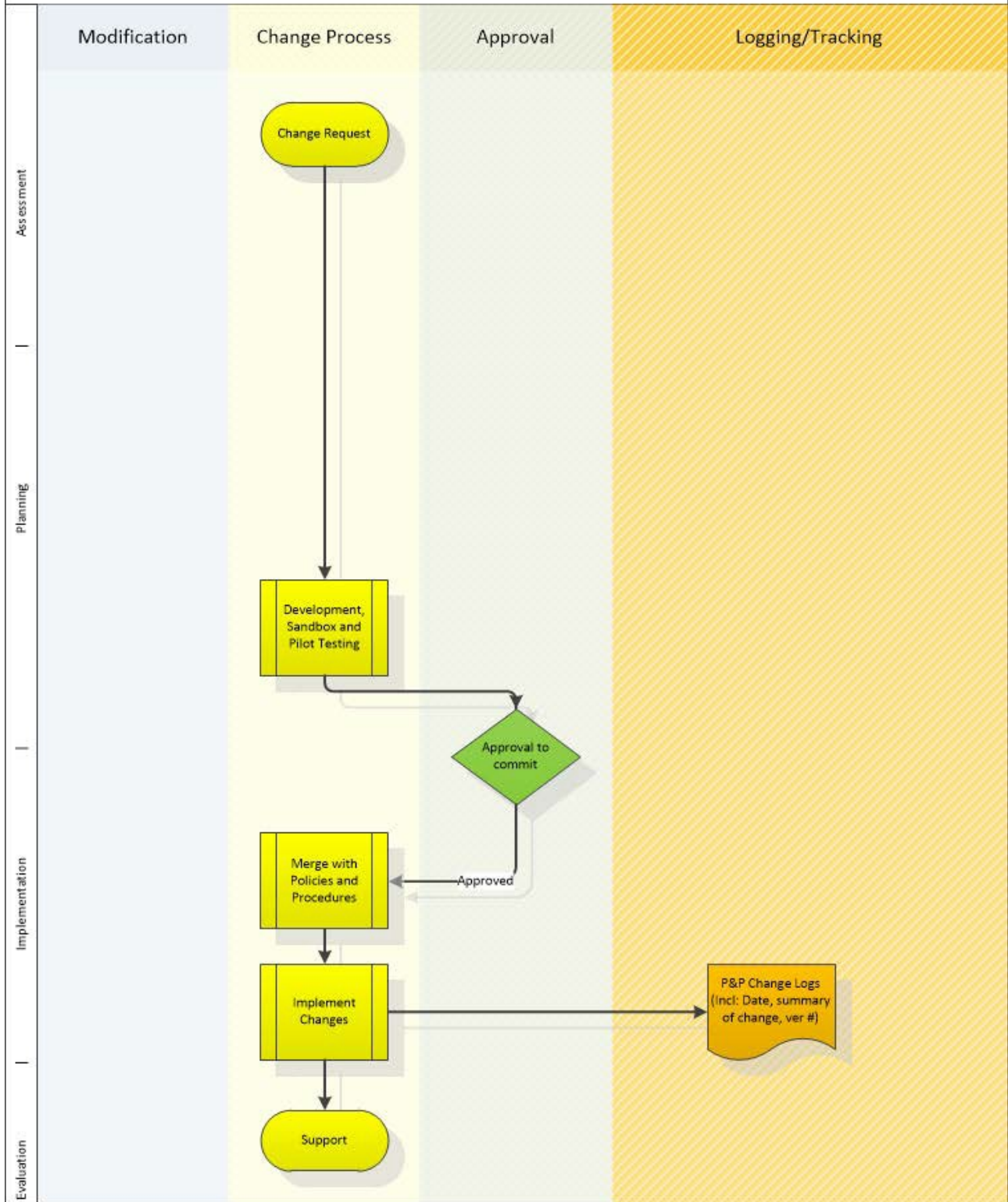
6. Schedule, Milestones, and Implementation

- A project overview must be developed prior to or parallel to the design phase of proposed changes. The overview must include estimated dates for design completion, testing, planned outages, training, and go-live. Implementation must use a best-effort to reduce likelihood, scope, and duration of down-time.

7. Evaluation and Support

- Post go-live/implementation must include appropriate support for changes. Support requests following implementation should also be included in post- implementation evaluations to identify both intended and unintended outcomes of the implemented change.

Change Management; incl. Planned Func. Development, Unexpected Issues, and Enhancements



Draft Oct 30, 2018

VIII. Technical Standards

The HMIS Lead Agency will ensure that the HMIS Software System:

1. Contains fields for collection of all data elements established by HUD notice.
2. Record data from a theoretically limitless number of service transactions while following federal, state, territorial, or local data retention laws and ordinances.
3. Generates the report outputs specified by HUD, including representation of dates for all historical and transactional data elements.
4. Produces reports that enable the CHOs and HMIS Lead Agency to assess compliance with HUD data quality benchmarks.
5. Generates audit reports that allow the HMIS Lead Agency to review the audit logs on demand, including HUD data requirements.

IX. Resources

Regulations and Requirements

HEARTH Act of 2009, S. 896 (<https://www.hudexchange.info/resource/1715/mckinney-vento-homeless-assistance-act-amended-by-hearth-act-of-2009/>)

CoC Program Interim Rule, 25 CFR Part 578
(<https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>)

HMIS Requirements Proposed Rule, 76 FR 22 76917
(<https://www.hudexchange.info/resource/1967/hearth-proposed-rule-for-hmis-requirements/>)

HMIS Data Standards

2004 HUD HMIS Data and Technical Standards, U.S. Dept. of Housing and Urban Development
<https://www.hudexchange.info/resource/1318/2004-hmis-data-and-technical-standards-final-notice/>

HMIS Data Standards Manual, U.S. Dept. of Housing and Urban Development
<https://www.hudexchange.info/resource/3826/hmis-data-standards-manual/>

HMIS Data Dictionary, U.S. Dept. of Housing and Urban Development
<https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>

Guides and Tools

HMIS Guides and Tools, U.S. Dept. of Housing and Urban Development
<https://www.hudexchange.info/resource/4055/hmis-project-descriptor-data-elements-manual/>

Butte Countywide Homeless Information Systems (HMIS) Public Notice

We collect personal information directly from you to:

- 1. Best connect you with the services you need;*
- 2. Better understand the needs of homeless persons;*
- 3. Improve planning to eliminate homelessness; and*
- 4. Improve services for homeless persons.*

The only people who will be allowed to see your information are HMIS trained staff for homeless service providers who have agreed to keep your information confidential. Additional details regarding data collection and sharing are discussed in our Privacy Notice. If you would like a copy of our Privacy Notice, please ask.

Butte Countywide Continuum of Care Privacy Notice

Adopted November 16, 2020

A. Scope of Notice

1. This notice describes the privacy policy and practices of Butte Countywide Homeless Continuum of Care (Butte CoC) and [**Name of Homeless Organization**], a Contributing HMIS Organization (CHO). Our main office is at [**Address, email/web address, telephone of Homeless Organization**].
2. A Homeless Management Information System (HMIS) is a software system used to collect data on the housing and services provided to homeless individuals and families and persons at risk of homelessness. All homeless assistance programs that are a part of the Butte CoC must participate in the HMIS, and are called Contributing HMIS Organizations (CHOs). CHO's are required to collect universal data elements from all clients, including Protected Personal Information (PPI).
3. The policy and practices in this notice cover the processing of PPI HMIS for clients of [**Name of Homeless Organization**].
4. Protected Personal information (PPI) is any information we maintain about a client that:
 - a. allows identification of an individual directly or indirectly
 - b. can be manipulated by a reasonably foreseeable method to identify a specific individual or
 - c. can be linked with other available information to identify a specific client
5. When this notice refers to personal information, it means PPI.
6. All personal information that we maintain is covered by the policy and practices described in this privacy notice. [**if programs provided by your agency have additional privacy requirements, please add that information here: for example “ Personal information that the medical clinic collects and maintains is covered by a different privacy policy”.**]
7. We adopted this policy because of standards for HMIS issued by the Department of Housing and Urban Development. We intend our policy and practices to be consistent with those standards. See 69 Federal Register 45888 (July 30, 2004).
8. This notice tells our clients, our staff, and others how we process personal information. We follow the policy and practices described in this notice.
9. We may amend this notice and change our policy or practices at any time. Amendments may affect personal information that we obtained before the effective date of the amendment.
10. We give a written copy of this privacy notice to any individual who asks.
11. A copy of this notice can be found on the Butte CoC website at www.buttehomelesscoc.com

B. Data Collection and Purpose

1. We collect personal information only when appropriate to provide services or for another specific purpose of our organization or when required by law. We may collect information for these purposes:
 - a. to provide or coordinate services to clients
 - b. to locate other programs that may be able to assist clients
 - c. for functions related to payment or reimbursement from others for services that we provide
 - d. to operate our organization, including administrative functions such as legal, audits, personnel, oversight, and management functions
 - e. to comply with government reporting obligations
 - f. when required by law
2. We only use lawful and fair means to collect personal information.
3. We normally collect personal information with the knowledge or consent of our clients. If you seek our assistance and provide us with personal information, we assume that you consent to the collection of information as described in this notice.
4. We may also get information about you from other CHOs within the Butte CoC.
5. We post a sign at our intake desk or other location explaining the reasons we ask for personal information. The sign says:

We collect personal information directly from you to:

1. *Best connect you with the services you need;*
2. *Better understand the needs of homeless persons;*
3. *Improve planning to eliminate homelessness; and*
4. *Improve services for homeless persons.*

The only people who will be allowed to see your information are HMIS trained staff for homeless service providers who have agreed to keep your information confidential.

Additional details regarding data collection and sharing are discussed in our Privacy Notice. If you would like a copy of our Privacy Notice, please ask.

C. Permitted Uses and Disclosures

1. We use or disclose personal information for activities described in this part of the notice. We may or may not make any of these uses or disclosures with your information. We assume that you consent to the use or disclosure of your personal information for the purposes described here and for other uses and disclosures that we determine to be compatible with these uses or disclosures:
 - a. to connect individuals to appropriate resources or services, for housing prioritization purposes, and for determining an individual's progress in programs or services
 - b. for functions related to payment or reimbursement for services

- c. to carry out administrative functions such as legal, audits, personnel, oversight, and management functions
- d. to create de-identified (anonymous) information that can be used for research and statistical purposes without identifying clients
- e. when required by law to the extent that use or disclosure complies with and is limited to the requirements of the law
- f. to avert a serious threat to health or safety if
 - (1) we believe that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public, and
 - (2) the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat
- g. to report about an individual we reasonably believe to be a victim of abuse, neglect or domestic violence to a governmental authority (including a social service or protective services agency) authorized by law to receive reports of abuse, neglect or domestic violence
 - (1) under any of these circumstances:
 - (a) where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law
 - (b) if the individual agrees to the disclosure, or
 - (c) to the extent that the disclosure is expressly authorized by statute or regulation, and
 - (I) we believe the disclosure is necessary to prevent serious harm to the individual or other potential victims, or
 - (II) if the individual is unable to agree because of incapacity, a law enforcement or other public official authorized to receive the report represents that the PPI for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends upon the disclosure would be materially and adversely affected by waiting until the individual is able to agree to the disclosure.
 - and
 - (2) when we make a permitted disclosure about a victim of abuse, neglect or domestic violence, we will promptly inform the individual who is the victim that a disclosure has been or will be made, except if:
 - (a) we, in the exercise of professional judgment, believe informing the individual would place the individual at risk of serious harm, **or**
 - (b) we would be informing a personal representative (such as a family member or friend), and we reasonably believe the personal representative is responsible for the abuse, neglect or other injury, and that informing the personal representative would not be in the best interests of the individual as we determine in the exercise of professional judgment.
- h. for academic research purposes
 - (1) conducted by an individual or institution that has a formal relationship with the CHO if the research is conducted either:
 - (a) by an individual employed by or affiliated with the organization for use in a research project conducted under a written research agreement approved in writing by a designated CHO program administrator (other than the individual conducting the research), or

- (b) by an institution for use in a research project conducted under a written research agreement approved in writing by a designated CHO program administrator.
- and
- (2) any written research agreement:
 - (a) must establish rules and limitations for the processing and security of PPI in the course of the research
 - (b) must provide for the return or proper disposal of all PPI at the conclusion of the research
 - (c) must restrict additional use or disclosure of PPI, except where required by law
 - (d) must require that the recipient of data formally agree to comply with all terms and conditions of the agreement, and
 - (e) is not a substitute for approval (if appropriate) of a research project by an Institutional Review Board, Privacy Board or other applicable human subjects protection institution.
 - i. to a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) under any of these circumstances:
 - (1) in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena
 - (2) if the law enforcement official makes a written request for PPI that:
 - (a) is signed by a supervisory official of the law enforcement agency seeking the PPI
 - (b) states that the information is relevant and material to a legitimate law enforcement investigation
 - (c) identifies the PPI sought
 - (d) is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought, and
 - (e) states that de-identified information could not be used to accomplish the purpose of the disclosure.
 - (3) if we believe in good faith that the PPI constitutes evidence of criminal conduct that occurred on our premises
 - (4) in response to an oral request for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the PPI disclosed consists only of name, address, date of birth, place of birth, Social Security Number, and distinguishing physical characteristics, or
 - (5) if
 - (a) the official is an authorized federal official seeking PPI for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others), and
 - (b) the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought.
- and
- j. to comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.

2. Before we make any use or disclosure of your personal information that is not described here, we seek your consent first.

D. Client Control Over Data

1. You may inspect and have a copy of your personal information that we maintain. We will offer to explain any information that you may not understand.
2. We will consider a request from you for correction of inaccurate or incomplete personal information that we maintain about you. If we agree that the information is inaccurate or incomplete, we may delete it or we may choose to mark it as inaccurate or incomplete and to supplement it with additional information.
3. To inspect, get a copy of, or ask for correction of your information, ask an agency staff member for assistance, contact this organization at [**Address, email/web address, telephone of Homeless Organization**], or email ButteCoC@buttecounty.net.
4. We may deny your request for inspection or copying of personal information if:
 - a. the information was compiled in reasonable anticipation of litigation or comparable proceedings
 - b. the information is about another individual (other than a health care provider or homeless provider)
 - c. the information was obtained under a promise or confidentiality (other than a promise from a health care provider or homeless provider) and if the disclosure would reveal the source of the information, **or**
 - d. disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.
5. If we deny a request for access or correction, we will explain the reason for the denial. We will also include, as part of the personal information that we maintain, documentation of the request and the reason for the denial.
6. We may reject repeated or harassing requests for access or correction.

E. Data Quality

1. We collect only personal information that is relevant to the purposes for which we plan to use it. To the extent necessary for those purposes, we seek to maintain only personal information that is accurate, complete, and timely.
2. We have a plan to dispose of personal information not in current use seven years after the information was created or last changed. As an alternative to disposal, we may choose to remove identifiers from the information.
3. We may keep information for a longer period if required to do so by statute, regulation, contract, or other requirement.

F. Complaints and Accountability

1. We accept and consider questions or complaints about our privacy and security policies and practices. You can complain about our privacy and security policies by writing to: Butte County DESS Housing and Homeless Branch, 202 Mira Loma Drive, Oroville, CA 95965 or e-mailing ButteCoC@buttecounty.net. You will receive a response in writing postmarked or date stamped within five working days if a valid email address or mailing address is provided in the written complaint.
2. All members of our staff (including employees, volunteers, affiliates, contractors and associates) are required to comply with this privacy notice. Each staff member must receive and acknowledge receipt of a copy of this privacy notice.

G. Privacy Notice Change History

1. Version 1.0, 11-16-2020, Initial Policy



Butte Countywide Homeless Continuum of Care

DATE: November 13, 2020

MEMORANDUM FOR: CoC Council, Members and participating Agencies

FROM: Jay Coughlin
Health and Human Services Program Analyst, Senior - Housing and Homeless
Butte County Department of Employment and Social Services

SUBJECT: LGBTQ and People of Color Committee and Priority Points

Background:

At the September 21, 2020 Butte Countywide Homeless Continuum of Care (CoC) Council meeting there was discussion regarding establishing a new CoC subcommittee to support the creation of more services for LGBTQ and People of Color homeless individuals. There was also discussion about the possibility of adding priority points in the Coordinated Entry (CE) for these homeless populations. The CoC Lead Agency offered to research information about adding a committee and possibly creating priority points in CE.

CoC Policies:

The CoC Governance Charter, Section V. Establishing the CoC Committees, states that the CoC may establish Committees, Subcommittees, or Work Groups that are made up of the Continuum of Care Members to act on behalf of the CoC. The current CoC Committees include the following:

- Executive Committee
- Governance Committee
- Homeless Management Information System (HMIS) / Coordinated Entry System (CES) Committee
- Households with Children Committee
- Veterans Committee
- Chronic Homelessness Committee
- Youth Homelessness Committee

As needed, a committee specific to the Point in Time Count as well as a Review and Ranking Committee may be enacted. Other committees as determined by the CoC Council may be established.

The Charter states that any CoC member can participate on a Committee and the CoC Council will approve a Chairperson and a Vice Chairperson. Each Committee will be required to establish a purpose and a description of their roles and responsibilities which will be approved by Council vote.

The CoC gives authority to the CoC Committees for specific responsibilities. Each active committee is required to report quarterly, or at least four times per year, to the CoC Council. Additionally, committees are encouraged by the CoC Lead Agency to keep a written agenda and minutes of their meetings and provide copies to be posted on the CoC website.

Efforts have been made by the CoC to address equal access to housing in the community as a stipulation of the funding provided. In 2016, the Butte CoC adopted a policy to ensure that Emergency Shelters, Transitional Housing and Permanent Housing providers do not deny admission, or separate family members, based on age,

sex or gender, LGBTQ status, marital status or disability when entering shelter or housing. This policy was tied to HUD's expectation as noted in the 2017 CoC Consolidated Application, Question 3B-2.4, which asked CoC's to describe their anti-discrimination policies. The CoC monitors that each CoC- and ESG- funded project has an anti-discrimination policy in place, which has been implemented, a notice of rights has been posted, and project staff are annually trained on LGBTQ rights and non-discriminatory housing and service practices. An additional policy titled "Equal Access to Housing in HUD Programs regardless of Sexual Orientation, Gender Identity, or Marital Status Policy" was adopted September 5, 2017.

Research:

The CoC Lead Agency began their research by reaching out directly to other California CoC's. The topic was also a discussion item during a CoC learning forum which included CoC representatives as well as State and Federal representatives. Through this process, no other CoC's were identified as having a committee focused solely on LGBTQ and People of Color issues. It was also recommended by the State and Federal representatives that priority points should not be given. Instead, it was suggested that more non-discrimination training be provided to the community and that CoC's could encourage partner agencies to implement non-discrimination policies by requiring them to have such policies in place as a funding requirement.

The team then reached out for Technical Assistance (TA) provided by HUD for more clarity and direction regarding implementing priority points. Working directly with a representative from the Cloudburst Group, it was confirmed that using sexual orientation or race/ethnicity criteria to prioritize individuals for housing or services is prohibited. This type of prioritization would be considered treating people differently based on a protected class. The TA representative clarified that the CoC could, however, use proxy elements that are more likely to impact certain populations over others. For example, because of structural racism, people of color are more likely to have a criminal record. The CoC could not prioritize on race, but could prioritize other disparities like previous history of foster care, criminal record, homelessness, or eviction, which could include more people of color. Additionally, it was pointed out that if the CoC would like to set up a separate physical Coordinated Entry (CE) access point, the CoC could not say "this location only serves LGBTQ people," but could (and would be encouraged to) set up access points in places where certain populations would have more access if you know they are currently being underserved. For example, if it is known that certain neighborhoods are more likely to lead to entries into homelessness, and those neighborhoods also have high proportions of people of color, a satellite CE entry point could be established there. Another option would be partnering with organizations that the CoC knows are in contact with underserved populations. For example, if it is known that LGBTQ youth are more likely to become homeless, the CoC could partner with a local organization that serves LGBTQ youth to start referring into the system.

Additional information:

HUD's CoC Racial Equity Analysis Tool and the Butte County CoC STELLA Worksheet can be used to help identify racial disparities in the Butte County CoC region. Both documents are included as an attachment to this MEMO.

Recommendations:

The CoC Lead Agency has three recommendations:

1. Although no other CoC has established a committee pertaining to LGBTQ and People of Color specifically, it would be fair to proceed with the development of a new subcommittee that addresses the barriers that these marginalized groups may experience in obtaining homeless resources. This committee must be approved by the CoC Council and must follow the CoC Committee guidelines as set forth by the Butte CoC Governance Charter.

2. In accordance with the information provided by HUD Technical Assistance, the CoC Lead Agency/HMIS Lead, recommends that no Coordinated Entry priority points be given based on a protected class. However, the CoC should continue to partner with organizations that provide services to underserved populations, such as LGBTQ and People of Color.

3. The CoC should continue to follow, and update when necessary, existing non-discrimination policies and continue to include non-discrimination policies as a requirement of partner agencies that receive CoC funding.