



*Working together
to end homelessness*

Tri-County Continuum of Care for Hunterdon, Sussex, & Warren Counties

Adopted by the Tri-County CoC Board on 08/06/2020

I. Governance Charter

Tri-County Continuum of Care for Hunterdon, Sussex & Warren Counties Governance Charter

The Tri-County Continuum of Care for Hunterdon, Sussex & Warren Counties By-Laws are attached as an Appendix to this document and include additional sections on Full Membership of the Tri-County Continuum of Care: Membership, Nominations, Elections, Meeting Frequency, Resignations and Removal, Board Establishment, Management, Selection and Term, Authority and Consultation, Voting Rights, Conflict of Interest, By-Laws, and Annual Rating and Ranking of HUD Applications. The By-Laws and this charter provide the core governance and operating policies for the Tri-County Continuum of Care for Hunterdon, Sussex & Warren Counties.

The establishment of the Tri-County Continuum of Care for Hunterdon, Sussex & Warren Counties derives from a decision reached by a planning body headed by the Directors of Human Services of Hunterdon, Sussex, and Warren Counties on June 17, 2011. The Tri-County CoC is advisory to the respective Human Services Advisory Councils in all three counties.

The Tri-County Continuum of Care for Hunterdon, Sussex & Warren Counties is a regional, year-round planning body of representatives from the community invested in working toward preventing and ending homelessness and coordinates strategies and activities toward this goal. Its work includes, but is not limited to:

- Gathering information to determine local needs and measuring results
- Setting the process for applying, reviewing, and prioritizing projects in the annual submission to the US Department of Housing and Urban Development (HUD) for homeless assistance grants

This Governance Charter was adopted in full by the Board on **August 6, 2020** and may be amended by a minimum two-thirds (67%) majority vote by the Tri-County Continuum of Care Board and shall be required to adopt such amendment, with a quorum present.

Tri-County Continuum of Care and Governance Structure

The name of this Continuum of Care shall be the Tri-County Continuum of Care for Hunterdon, Sussex & Warren Counties, herein referred to, respectively, as the “Tri-County CoC” as established by the bylaws of the same name.

The Tri-County CoC structure is made up of and represented by a Tri-County Continuum of Care Board, herein referred to, respectively, as the “CoC Board,” Collaborative Applicant, Selection Committee, Advisory Committee, and subcommittees.

Purpose of the Tri-County CoC

The Tri-County CoC serves two main purposes:

1. To create a strategic plan to address the use of HUD resources and their interface with other funding sources to address and prevent homelessness. The Tri-County CoC is the body that provides a forum for discussing plans to end homelessness, identifying and ranking the community’s priority needs, educating the community on homeless issues, monitoring existing homeless programs and advocating on issues affecting people who are homeless or at risk of becoming homeless.
2. To submit application to HUD for McKinney Vento Homeless Assistance resources through an annual competition announced each year in HUD’s Notice of Funding Availability (NOFA).

Purpose of the Tri-County CoC Board

The CoC Board is made up of representatives designated and approved by their local planning body (CEAS, Housing Committee, or Homeless Continuation of Care) in Warren, Sussex, and Hunterdon counties. Each continuum shall have a minimum of three members on the Tri-County CoC Board.

- Every three years, the local committees will either confirm the current representatives or select new representatives to the CoC Board
- The authority and consultative role of the CoC Board is established in the Tri-County CoC By-laws

The duties of the CoC Board include, but are not limited to:

- The relaying of information between the Tri-County CoC and their local continua
- The identification of ways to coordinate and link resources across the Tri-County region that will help to avoid duplication and facilitate movement toward permanent housing and self-sufficiency
- The evaluation and monitoring of all HUD funded programs, including CoC and ESG
- Oversight of the HUD Homeless Assistance Grant application process
- The review and ranking of all proposed projects, both new and renewals, for HUD funding
- Participation in, and support of, the local Homeless Management Information System (HMIS). Data will be collected to better identify unmet needs, educate the community and used as a tool to advocate for additional resources
- Establishment of Ad-Hoc committees as necessary to address initiatives and planning

Purpose of the Tri-County CoC Collaborative Applicant

The Collaborative Applicant designated and approved by the CoC Board shall carry out the work of the Tri-County CoC in accordance with the direction of the CoC Board. These activities shall include:

1. Compiling and submitting the CoC application
2. Compiling and submitting Point-In-Time Count and Housing Inventory Chart
3. Use HMIS to compile and submit System Performance Measures

4. Use HMIS to compile and submit Longitudinal System Analysis
5. Facilitating a Coordinated Assessment and Referral System
6. Holding at least semiannual meetings of the full membership of the Tri-County CoC with formal, published agendas
7. Ensuring that new members are invited to the Tri-County CoC annually through a publicly available invitation – such as in social media, newspapers with general circulation in the area, through announcement to local boards and commissions, and in other publicly accessible ways
8. Appointing committees, subcommittees, or workgroups to carry out the tasks of the Tri-County CoC as established by the CoC Board
9. Adopt and follow a written CoC Board selection process with code of conduct, conflict of interest and recusal process
10. Writing and issuing correspondence on behalf of the Tri-County CoC
11. Adopt and follow a written process for requesting, evaluating, and prioritizing projects

Purpose of Subcommittees

The CoC Board has authorized and established the following subcommittees to carry out specific work pertaining to CoC tasks:

Permanent Subcommittees

- Veterans Master List Subcommittee
- Data Quality Subcommittee
- Case Conferencing (Coordinated Assessment) Subcommittee

Full Tri-County CoC Membership

Membership is open to all interested community members and organizations. The Tri-County CoC will particularly encourage participation by anyone serving the homeless or anyone who is currently homeless or has been homeless.

Agencies and Organizations seeking membership on the Tri-County CoC should be members and participants in good standing on their county committees (i.e. CEAS, Housing Committee, or Homeless Continuation of Care).

To better facilitate coordination and planning efforts, members continue to participate in their local emergency services committees (CEAS, Housing, or Homeless Continuation of Care). These local committees address community-level planning, identify service gaps, and plan and prioritize new and renewal homeless assistance projects. Local committees are responsible for planning and coordinating the county Point in Time Count and identifying all services to aid those experiencing or at risk of experiencing homelessness. Each local committee also assesses barriers to service delivery and special populations that may find it more or less difficult to access available services. Local committees are a sub-committee of the counties' Human Services Advisory Council (HSAC).

Tri-County CoC Operations

In compliance with HUD, Tri-County CoC program regulations and activities of the CoC include the following:

- CoC Board will meet a minimum of four times per year
- Hold meetings of the full membership, at least once a year

- Make at least an annual invitation for new members to join
- To encourage and develop public understanding on homelessness and housing issues
- To provide advocacy on homelessness and housing issues
- Encourage housing and homeless programs to adopt best practices
- Strategize to fill in gaps in temporary and permanent housing, job training and development
- Ensure participation of grantees in the Homeless Management Information System (HMIS)
- Establish performance targets, in consultation with providers, appropriate to each program type, monitor program performance and take action against poor performers
- Collect data on the needs of those experiencing homelessness and housing insecurity through the HMIS system, Point in Time Count and Housing Inventory
- Create and implement strategies and action steps to reduce and end homelessness in the Tri-County region

Tri-County CoC Fundamental Components for the Homeless

- Comprehensive coordinated assessment: a system which provides an initial assessment of the needs of individuals and families for housing and services
- Prevention: stabilization services and activities to assist at-risk families and individuals. These services may include rental and utility assistance, mortgage assistance and legal assistance
- Outreach: Services to address and identify a person's immediate needs, including mobile clinics, street outreach, law enforcement and hotlines.
- Emergency shelter: Temporary shelter for individuals and families prior to identification of appropriate services and options to facilitate access to permanent housing options
- Transitional housing: Longer-term housing with varying degrees of support for certain individuals or families who may not be adequately prepared for permanent housing
- Permanent Housing: Long term safe and affordable housing for individuals and families

Tri-County CoC Eligible Program Components

The Continuum of Care funds may be used to provide funding for the following project types:

Permanent Supportive Housing (PSH)

Permanent Supportive Housing is provided through the Tri-County CoC as long term assistance through either rental assistance or leasing funds for individual permanent housing units in the community, or funding for a single permanent housing structure using operating funds. Projects may also apply for acquisition, rehabilitation, or new construction funds for creating new permanent housing within the County. PSH programs will be utilized for the hardest to serve population and for those with the most barriers to housing and highest level of need. All PSH projects funded through the Tri-County CoC will make services available to all PSH participants. All services should be individualized and should relate directly to the household's specific level of need.

Tri-County CoC functions with a Housing First focus, so it prioritizes projects that utilize a Housing First approach. The Housing First approach focuses on providing low barrier access to permanent housing to the hardest to serve populations, without putting contingencies, such as service provision, on the ability of the household to remain in the permanent housing project.

Rapid Rehousing (RRH)

Tri-County CoC funds may be used to provide Rapid Rehousing services to homeless individuals and families through the use of short or medium term rental assistance. Services related to the household's need, including employment and education services, are provided to the household during the time they are receiving the rental assistance. This project model allows households with moderate barriers or needs to obtain permanent housing and receive the services needed that will enable them to maintain housing after the monetary assistance has ended.

While the Tri-County CoC is working to focus and prioritize funding for permanent solutions to ending homelessness, the following project types are still eligible to be funded under the Tri-County CoC:

Transitional Housing (TH)

Transitional housing projects funded under the Tri-County CoC will be structured to facilitate the movement of homeless individuals and families to permanent housing within 24 months of entering the project. Grant funds provided for transitional housing can be used for the operating or leasing costs associated with maintaining the structure or services provided to the participants of the project. Transitional Housing is geared towards populations that are harder to find permanent destinations for but that may not be at a high enough level to receive a permanent supportive housing voucher.

Supportive Service Only (SSO)

A Supportive Service Only project can be used to provide services to unsheltered and sheltered homeless persons, without the recipient providing housing or housing assistance. SSO funds may be available in the community for the Coordinated Assessment System for the CoC, which will assist sheltered and unsheltered households in finding appropriate housing placements based on their needs.

Homeless Management Information System (HMIS)

Since entering data into the Homeless Management Information System is a funding requirement, the Tri-County CoC works in conjunction with New Jersey, Housing and Mortgage Finance Agency (NJ HMFS) through a dedicated grant that provides funding to oversee and support the data collections for the Tri-County CoC. NJ-HMFA is the HMIS provider contracted by the State of New Jersey to assist with meeting data collection requirements.

Continuum of Care Planning Grant

To assist the CoC Collaborative Applicant in completing all responsibilities associated with CoC funding, as outlined in HEARTH, the Continuum of Care applies for planning funds annually to supplement the funding already provided by the County for these activities.

All projects that receive funding for a project type listed above must utilize the funding for eligible activities and items as outlined in the CoC Guidelines in the HEARTH Act.

Tri-County CoC Eligible Applicants for Funding

The following groups may apply for Continuum of Care funding:

- Nonprofit Organizations
- States
- Local Governments, and

- Instrumentalities of State or local governments

Tri-County CoC Determining and Prioritizing Needs

As part of the annual application to HUD for Homeless Assistance Grants, it is required that the Tri-County CoC calculate the unmet need in the region. Unmet need reflects the difference between the Tri-County CoC bed capacity and the number of homeless persons at one point in time. The Tri-County CoC will use the data collected as a result of the Point in Time Count and the Housing Inventory Count to determine the housing and service needs of those experiencing homelessness. Standardized formulas set forth by HUD allow continuums to calculate their unmet need based on program type (emergency shelter, transitional housing, and permanent supportive housing).

Recognizing that all that is known about the homeless population is not indicated in that data, the Tri-County CoC will rely on local experts to review the data and offer additional local information. Local experts should include homeless assistance providers, persons experiencing homelessness and/or formerly homeless individuals.

In order to develop strategies to address unmet needs, the Tri-County CoC will determine and prioritize gaps. The CoC Board will review the homeless count, housing inventories and other relevant data with particular attention paid to:

- Groups not yet served versus those with some housing resources in place
- Gaps in each major housing type (transitional, permanent supportive housing or permanent housing)
- Vulnerability and need among sub-populations (e.g. those with mental illness, substance abuse, unaccompanied youth, persons with HIV/AIDS and/or veteran populations)
- Growing needs
- Waiting lists
- High end users/ discharge
- Services which help move individuals/families into stable housing and greater self-sufficiency

The CoC Board will vote to prioritize gaps; those that receive the most votes will be given the highest priority. Low priority does not indicate that there is not a need, rather, relative to other needs or gaps it is less of a priority. The results of the prioritization will be used to inform decisions regarding new and renewal projects for the annual application to HUD.

Tri-County CoC Eligible Project Participants and Prioritization

In late 2011, HUD released the final rule to define “homeless” under HEARTH. They established 4 categories of homeless:

Category 1 – Literally Homeless

Category 1 includes an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- i. Has a primary nighttime residence that is a public or private place not meant for human habitation;
- ii. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements

(including congregate shelters, transitional housing, and hotels or motels paid for by charitable organizations or federal, state and local government programs); or
iii. Is exiting an institution where she/he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 2 – Imminent Risk of Homelessness

Category 2 includes an individual or family, who will imminently lose their primary nighttime residence, provided that:

- i. Residence will be lost within 14 days of the date of application for homeless assistance;
- ii. No subsequent residence has been identified; and
- iii. The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 3 – Homeless under Other Federal Statutes

Category 3 includes unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- i. Are defined as homeless under the other listed federal statutes;
- ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- iii. Have experience persistent instability as measured by two moves or more during the preceding 60 days; and
- iv. Can be expected to continue in such status for an extended period of time due to special needs or barriers

Category 4 – Fleeing/Attempting to Flee Domestic Violence

Category 4 includes any individual or family who:

- i. Is fleeing, or is attempting to flee, domestic violence;
- ii. Has no other residence; and
- iii. Lacks the resources or support networks to obtain other permanent housing

Chronically Homeless

Chronic homelessness shall be as defined in HUD Final Rule on Defining Chronic Homelessness: <https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf>

Chronically homeless means:

(1) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

- (i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- (ii) Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness

separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;

- (2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
- (3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Tri-County CoC Documentation

All projects must maintain documents detailing eligibility of households based on the homeless categories listed above. The documentation to be collected for Homeless Categories 1 – 4 is as follows:

Category 1 – Literally Homeless:

- Written observation by the outreach worker; or
- Written referral by another housing or service provider; or
- Certification by the individual or head of household seeking assistance stating that she/he was living on the streets or in shelter;
- For individuals exiting an institution-one of the forms of evidence above and:
 - Discharge paperwork or written/oral referral, or
 - Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited institution

Category 2 – Imminent Risk of Homelessness:

- A court order resulting from an eviction action notifying the individual or family that they must leave; or
- For individual and families leaving a hotel or motel-evidence that they lack the financial resources to stay; or
- A documented and verified oral statement and
- Certification that no subsequent residence has been identified; and
- Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing

Category 3 – Homeless under Other Federal Statutes

- Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and
- Certification of no permanent housing in the last 60 days; and
- Certification by the individual or head of household, and any available supporting documentation, that she/he has moved two or more times in the past 60 days; and
- Documentation of special needs or two or more barriers

Category 4 – Fleeing/Attempting to Flee Domestic Violence

- For victim service providers:
 - An oral statement by the individual or head of household seeking assistance, which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.
- For non-victim service providers:
 - Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
 - Certification by the individual or head of household that no subsequent residence has been identified; and
 - Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

For projects that are providing housing that is dedicated or prioritized for the chronically homeless population, the Tri-County CoC requires that the projects follow the recordkeeping requirements as outlined in the HUD Notice CPD- 16-11 titled ‘Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing’.

Length of Assistance and Participants Contribution

Housing projects funded through the Tri-County CoC must comply with the following standards for length of assistance and participant contribution:

Permanent Supportive Housing (PSH)

Permanent supportive housing projects that provide rental assistance or leasing funds to pay for a portion of participant’s rent can provide housing assistance for as long as the eligible household member remains a participant in the project. While this is true, it is the responsibility of the agency to complete an annual assessment of needs with the households to ensure all households receiving long-term permanent housing assistance are still in need of the assistance. If, after an assessment, it is determined that a household does not need the level of services provided in a permanent supportive housing project, the agency should work with and encourage the household to explore other permanent housing options in the community to provide turnover for households that are in greater need.

Permanent Supportive Housing projects have the ability to decide whether they will charge occupancy charges for participants to remain in their housing program. If the agency does decide to enforce occupancy charges, the charge must be based on the household’s income and cannot exceed 30% of the household’s adjusted monthly income. When calculating the percentage of household income that will be paid by a client household, all projects should adhere to the HEARTH regulations and should ensure that utilities are either included in the rent or that a utility allowance is calculated and included in the rent calculation to ensure the household has enough funding to cover the utilities and rent portion for the unit. A new rent calculation must be done at

least annually for the household, or interim calculations may be completed if the household's income decreases before their next rent calculation is set to be evaluated.

Rapid Rehousing (RRH)

Based on the nature of Rapid Rehousing projects, participants receiving assistance through a rapid rehousing project will receive medium-term rental assistance and supportive services while participating in the project. For Tri-County CoC Rapid Rehousing projects, case managers will meet with households at least monthly to assist them in finding employment or education opportunities that will improve their ability to maintain their permanent housing unit after monetary assistance has ended. After three months, the agency will evaluate monthly, the household's need for continued rental assistance. No household will receive more than 24 months of rental assistance in a rapid rehousing project.

Because the goal of the Rapid Rehousing project is to work with clients to enable them to maintain their permanent housing after the rental assistance has ended, the Tri-County CoC has determined that the amount of rent households pay will be determined on a case-by-case basis. This enables agencies to allow households to save their income for when they are not receiving rental assistance, or to pay less towards their rent based on the household's expenses. The amount a household pays toward rent should be based on the household's total income and total expenses required to maintain the household. Case managers should work with the household to establish a budget and the amount of rent contributed by the household should be established and updated based on this budget. Agencies will have discretion as to the amount households are contributing for rent.

When calculating a participant's rent, all agencies must remain in compliance with the HEARTH standards and should ensure the rent either includes utilities or that a utility allowance is included in the rent calculation and budget for the household.

Transitional Housing (TH)

Participants may remain in a transitional housing project for up to 24 months. While this is the case, it is the view of the Tri-County CoC that all transitional housing projects should be working with households from when they enter into the project to establish a permanent housing plan and move households into permanent housing as quickly as possible.

Transitional housing projects have the ability to decide whether they will charge occupancy charges for participants to remain in their transitional housing project. If the agency does decide to enforce occupancy charges, the charge must be based on the household's income and cannot exceed 30% of the household's adjusted monthly income.

Any exception that needs to be made to these standards for PSH, RRH or TH must be submitted and approved by the Tri-County CoC before implementation.

Termination of Assistance for Participants

All Continuum of Care projects must have a specific termination of service policy that is followed when assistance for a household will be ended. All households must be aware at project entry about this process and what factors could have an impact on their ability to remain in the project. Because the CoC is looking to ensure households are not being discharged due to restrictions put

in place by the project, it is expected that all Continuum of Care projects will have a low number of terminations due to non-compliance or disagreements with rules or staff in the project. All projects must also have a written policy for addressing consumer grievances and for ensuring that consumers are aware at project entry regarding this process and how to express any grievances they have regarding project policy.

Tri-County CoC Responsibilities of Funded Agencies

All projects funded through the Tri-County CoC have responsibilities and requirements in order to continue to receive funding. All of these requirements are monitored through the Tri-County CoC monitoring process for CoC projects.

Project Level Reporting Requirements

- Annual Performance Report (APR) – All projects funded through the Tri-County CoC are required to submit an Annual Performance Report using the SAGE HMIS portal within 90 days of the end of the project’s operating year. The APR is used to report information to HUD about the participants in the project, the amount of assistance that has been used from the project grant, as well as other services and funding that has been used throughout the operating year to supplement the HUD funding. The APR is also a way for the agency to demonstrate to HUD the effectiveness of the project. During annual project review, the Tri-County CoC lead will provide the CoC Board with a copy of the APRs for review. Members will summarize any concerns outlined in the report; grantees may be provided with any concerns in writing from the Tri-County CoC Collaborative Applicant. Grantees should plan to address areas of concern and submit a brief improvement plan to the CoC Board via the Collaborative Applicant. The CoC Board will monitor the project quarterly or until the improvement plan is completed/satisfied.
- Local CoC Application – As outlined in Article VIII – Annual Rating and Ranking of HUD Applications, all Tri-County CoC-funded projects are required to participate in the Local Funding Selection Process of the Tri-County Continuum of Care.
- HUD Project Application – In addition to adhering to the local application process for receiving Continuum of Care funding, all Tri-County CoC projects must complete and submit their individual Project Application annually for continued funding under the CoC program. The submission of this application must be in accordance with the timeframe that is established by the Tri-County CoC Board to ensure all project applications are submitted in a timely manner for review before final submission to HUD.

Tri-County CoC Level Reporting Requirements

- Point in Time Count – The Point in Time (PIT) count is an annual one-day count of the sheltered and unsheltered homeless throughout the Continuum of Care. The PIT is not only a HUD requirement, but also an essential tool for generating local data, specifically on the unsheltered homeless population in the community. As part of receiving Continuum of Care funding, all projects that are applicable to participate in the Point in Time, must provide data through the appropriate means as defined by the CoC for that PIT year.
- Housing Inventory Chart - The Housing Inventory Chart (HIC) provides HUD with a complete list of the homeless projects, not only those funded through the Continuum of Care, for Tri-County CoC. The HIC includes information about target populations, unit configuration, and number of persons served on the night of the PIT Count for all emergency shelter, transitional housing and permanent housing projects. As with the PIT,

all projects that get Tri-County CoC funding must provide the Tri-County CoC Collaborative Applicant with the information needed to complete the Housing Inventory Chart.

- Longitudinal System Analysis – Every year, HUD had required all Continuums of Care to submit an Annual Homeless Assessment Report (AHAR), and now requires submission of Longitudinal System Analysis (LSA) which provides information from HMIS participating emergency shelter, transitional housing and permanent housing projects about the population that was served over a year-long time frame. While this information is pulled from HMIS, there are sometimes questions or data entry errors that need to be updated for accurate submission to HUD. All CoC and ESG-funded projects are required to answer questions and assist the Tri-County Continuum in the completion and submission of the LSA.

Homeless Management Information System (HMIS) Participation

All projects funded under the HUD Continuum of Care process are required to participate in HMIS. Entering information into this system not only lets the agency use the system for its reporting requirements to HUD, but also allows the CoC to gather information about the populations being served throughout the community and to evaluate the performance and compliance with project specific standards and regulations for funding purposes. All agencies must adhere to the HMIS policies and procedures for the Tri-County CoC.

The Tri-County CoC will encourage all providers to include all of their homeless-dedicated beds in HMIS. The Tri-County CoC will review and assess its HMIS bed coverage on a quarterly basis.

Applicants are strongly encouraged to participate in all data collection activities of the Tri-County CoC.

If a Tri-County CoC recipient or provider is a victim services provider (defined by VAWA) it is prohibited from entering client-level data into an HMIS. CoC and ESG funds may be used to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. It is up to the CoC to work with the HMIS lead to determine if a system is a comparable database. This means that it must be documented that the alternative system meets all HUD system requirements.

Participation in the Coordinated Assessment System

All projects that receive Continuum of Care and Emergency Solutions Grant funding must take part and accept referrals from the Coordinated Assessment System for the Tri-County CoC.

Additionally, all local shelters and outreach providers are also urged to provide intensive housing placement and planning prior to discharging residents with a referral through coordinated assessment. The Coordinated Assessment System was created to assist households in a more efficient way and to ensure prioritization of the hardest to serve and most in need households. The full prioritization process and role of the agencies in the Coordinated Assessment System are outlined in the Coordinated Assessment System Policies and Procedures for the Tri-County CoC.

Participation in Planning Meetings

The CoC works to achieve its goal of ending homelessness through the collaboration and effective homeless planning by the agencies throughout the Tri-County. This is especially important for projects that are receiving funding through the Continuum of Care. For this reason, all agencies

that receive Tri-County Continuum of Care funding are expected to attend full and subcommittee meetings of the Tri-County CoC. It is through these meetings and discussions that the Continuum is able to fully understand and plan for the needs of the homeless throughout the community.

Recordkeeping Requirements

In order to ensure projects are in compliance with HUD regulations and CoC requirements, all Tri-County CoC projects must maintain the following records for all project participants for a minimum of five (5) years:

- Homeless eligibility documentation (as outlined above)
- Disability documentation (if applicable)
- Annual income
- Services provided to the participant
- HMIS Consent Form
- Termination documentation (when applicable)
- Documentation demonstrating compliance with Housing Quality Standards
- Backup documentation to substantiate drawdowns for all funds, including timesheets for administrative funding drawdowns
- Documentation of conducting rent reasonableness testing

Commitment to Creating LGBTQ Inclusive Facilities and Programming

All agencies that receive Tri-County CoC funding must comply with HUD's Equal Access Rule which states HUD supported housing programs remain open to all eligible individuals regardless of marital status and actual or perceived sexual orientation or gender identity. Due to the increased risk for homelessness among the lesbian, gay, bisexual and transgender and questioning (LGBTQ) community all CoC agencies must meet the following requirements to help ensure all agencies within the continuum provide LGBTQ inclusive facilities and programming:

Policy, Staff, and Residents

- All providers must publicly post information stating they are a HUD equal access program and information about their Fair housing and Anti-Discrimination policies. Such policies must clearly state LGBTQ and gender non-conforming residents as a protected class under these policies.
- All providers must publicly post how a resident may seek redress under the Law Against Discrimination and to develop a system for reporting discrimination.
- All providers must use appropriate transgender and LGBTQ inclusive language in communications, publications, and training. This includes, but is not limited to, addressing residents by their appropriate name and pronoun.
- Policies and procedures relating to healthcare must not discriminate against transgender, non-conforming clients and must also incorporate information on local resources available for LGBTQ specific healthcare resources.
- All agencies must establish and enforce inclusive standards for staff and residents.
- Intake workers must provide clients seeking services with an overview of the protection of residents based on actual or perceived orientation, gender identity, and gender expression, as well as the opportunity to disclose whether an individual requires particular accommodations due to this.

- All programs must offer clients seeking services the opportunity to voluntarily disclose his or her sexual orientation, gender identity, or gender expression only after there is a discussion about the programs policies, accommodations for LGBTQ populations, and the ability to safeguard confidential information.

Confidentiality

Agency confidentiality policies and procedures must include a client's sex assigned at birth on their list of confidential information.

Inclusive space/Facilities

All agencies that receive Tri-County CoC funding that manage housing facilities, including emergency shelters, must, to their best ability, adapt strategies that result in creating inclusive physical spaces, meeting resident privacy and safety needs. Agencies should ensure policies do not isolate or segregate residents based on actual or perceived gender identity.

Training

- Agency participation is required at annual LGBTQ cultural competency and HUD Equal Access training provided by the CoC. Furthermore, agencies are expected to provide on-going training, based on the CoC LGBTQ training or other HUD approved resources, to staff unable to attend this training.

Homeless Youth Education and Development

All Tri-County CoC funded agencies that service families or youth up to 24 years of age must designate a staff person as their agency's "Youth Advocate" to ensure that:

- All school-aged youth remain enrolled in school during periods of homelessness and/or during the transition into permanent housing.
- All Youth Advocates gather the names of homeless school-aged youth and report the names to Regional Educational Services Commission.
- All Youth Advocates inform homeless families of their children's educational rights under the McKinney-Vento Act and connect children with community services, including early childhood programs such as Head Start.
- All Youth Advocates connect homeless families to their LEA McKinney-Vento Homeless Liaison or other designated staff person identified by the LEA.

Housing Quality Standards

Housing leased with Tri-County CoC are program funds, or for which rental assistance payments are made with Continuum of Care program funds, must meet the applicable housing quality standards (HQS) under HUD's Federal Regulations, 24 CFR 982.401 (https://www.hud.gov/program_offices/public_indian_housing/regs/fedreg), except that 24 CFR 982.401(j) applied only to housing units that are occupied by project participants receiving tenant-based rental assistance. For housing rehabilitated with funds under the CoC, the lead-based paint requirements in 24 CFR part 35, subparts A, B, J and R apply. For housing that receives project-based or sponsor-based rental assistance, 24 CFR part 35, subparts A, B, H, and R apply. For residential property for which funds under the CoC are used for acquisition, leasing, services or operating costs, 24 CFR part 35, subparts A, B, K, and R apply. All projects must retain

documentation of compliance with the housing standards in 578.75(b) as detailed above, including inspection reports.

Participation of Homeless Individuals

Each agency that receives Tri-County CoC funding, must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient or sub-recipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services or assistance provided under the project. This requirement is waived if a recipient or sub-recipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.

Match and Leveraging Requirements

All Tri-County CoC projects must match all grant funds, except for leasing funds, with no less than 25% of funds or in-kind contributions from other sources.

In addition, the Tri-County CoC encourages the project to provide some level of leveraging funds for all projects. Leveraging includes any cash or in-kind contributions to the project that exceed the 25% match requirement.

When calculating or documenting cash or in-kind contributions for match and leveraging, all projects must adhere to the regulations outlined in 578.73 of the HEARTH Act.

As a note, any services that would be provided by a third party, the recipient or subrecipient must have a signed memorandum of understanding (MOU) with the third party that specifies the services, and monetary value of the services being provided by the third party in order to use third party services as documentation for match or leveraging.

This MOU should follow the specifics listed in 578.73 of the HEARTH Act.

Emergency Transfer Plan

The Tri-County CoC is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), the CoC allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of the agency to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the agency has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that Tri-County CoC projects are in compliance with VAWA.

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall notify the CoC-funded agency's administrative office and submit a written request for a transfer to another location. The agency will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under the agency's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

Confidentiality

The Tri-County CoC funded agency will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives the agency written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about the Tri-County CoC funded agency's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

The Tri-County CoC funded agency cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. The CoC-funded agency will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. The CoC-

funded agency may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If the agency has no safe and available units for which a tenant who needs an emergency is eligible, the agency will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, the agency will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

For families living in units receiving project-based rental assistance (assisted units), if a program participant qualifies for an emergency transfer, but a safe unit is not immediately available for an internal emergency transfer, that program participant shall have priority over all other applicants for tenant-based rental assistance, utility assistance, and units for which project-based rental assistance is provided.

For families receiving tenant-based rental assistance, the non-transferring family member(s) will continue to receive tenant-based rental assistance through the end of the term of the lease, if the family separates in order to effect an emergency transfer and the non-transferring family members did not engage in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking. For families living in units that are otherwise assisted under this part (assisted units), the required policies must provide that for program participants who qualify for an emergency transfer but a safe unit is not immediately available for an internal emergency transfer, the individual or family shall have priority over all other applicants for rental assistance, transitional housing, and permanent supportive housing projects funded under this part, provided that: The individual or family meets all eligibility criteria required by Federal law or regulation or HUD NOFA; and the individual or family meets any additional criteria or preferences established in accordance with 24 CFR 93(b)(1), (4), (6), or (7). The individual or family shall not be required to meet any other eligibility criteria or preferences for the project. The individual or family shall retain their original homeless or chronically homeless status for the purposes of the transfer.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe. Tenants who are or have been victims of domestic violence are encouraged to contact the local CoC victim service providers.

Conflict of Interest

As defined by Bylaws

Annual Rating and Ranking of HUD Applications

Section 1 Application Process

The Tri-County CoC serves as the applicant for Homeless Assistance Grants administered by HUD under the McKinney-Vento Homeless Assistance Act. Family Promise of Sussex County serves as the lead entity in the application process. Several programs are funded through the Tri-County Continuum of Care grants. Information on eligible component types and expenses funded through a CoC program can be found in the Continuum of Care Program Interim Rule on the Hud Exchange at: <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>

Section 2 - Project Selection

A Tri-County CoC Request for Letter of Intent (RLI) is released prior to the competition for which proposals are sought. The RLI is written in anticipation of an announcement by HUD of available funds. The RLI will contain all information regarding the application process, as well as information regarding appeals. The RLI is advertised across the Tri-County region and distributed via email to extensive mailing lists submitted by each local continuum to the Tri-County CoC lead.

Organizations that receive information about funding availability will include governmental agencies, homeless and non-homeless service providers, non-governmental organizations, faith-based organizations, medical providers and organizations that target sub-populations. The Tri-County CoC invites these organizations to share information with any group not included in the original announcements. The CoC will seek project proposals for both new and reallocated funding from agencies that have not been previously funded.

The Tri-County CoC Board will appoint a Selection Committee on an annual basis. Each local county will be represented by two members on the Selection Committee. Members of this committee will review and score all applications submitted and rank projects for the final application to HUD.

Section 3 - Project Ranking

Established factors and criteria listed in the RLI will be considered as the applications are evaluated. Several primary factors will be taken into account:

- Federal and local priorities to address homelessness
- Agency capacity and experience
- Leveraging/match requirements
- Program cost and efficiency

The Selection Committee will hold a roundtable discussion to share project assessment and ranking. Grants will be prioritized based on their score and placed into a Tiered system with Tier 1 applications being essentially protected from losing funding based on the Annual Renewal Amount (ARA) of projects that are renewing for the first time plus 94% of the combined ARA for all other renewal projects. All projects that do not fit into that 94% will fall into Tier 2. Tier 2 grants compete for funding on a national level. The higher the Tri-County CoC scores on the overall application and the higher the project score, the more likely the Tier 2 project is to be funded.

The committee may choose to interview each project applicant. Overall raw scores are calculated, and the Selection Committee will determine viable applicants. If more applications are submitted than the CoC has money to fund, the lowest scoring projects will be eliminated.

Recommended projects are presented to the Tri-County CoC Board for final approval. Every attempt will be made to apply for all possible funds. After final approval, scoring results will be delivered to applicants in writing.

The Ranking and Review process and RLI are posted on the CoC Collaborative Applicant's website.

Section 4 - After Grant Submission

Agencies who have been selected for funding through the HUD Continuum of Care process will agree to become a full participant, if not already, in the Tri-County CoC. Funded agencies will also agree to participate in data collection, submit an Annual Progress Report (APR) to HUD and the Tri-County CoC and comply with an annual site visit by the Tri-County CoC.

Section 5 – Longitudinal System Analysis (LSA)

A critical aspect of the McKinney-Vento Homeless Assistance Act, as amended, is a focus on viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community.

The Longitudinal Systems Analysis (LSA) report will be produced from the Tri-County CoC's Homelessness Management Information System (HMIS) and submitted annually to HUD via the HDX 2.0, provides HUD and Continuums of Care (CoCs) with critical information about how people experiencing homelessness use their system of care.

The Tri-County CoC will review the LSA data with an eye toward the following:

- Bed utilization rates
- Anomalies in data collected between similar programs
- Anomalies in data collected in recent period vs. previous ones
- Other discrepancies

The Tri-County CoC will work with provider agencies on data collection and quality. The Tri-County CoC Collaborative Applicant will work with the HMIS Lead Agency team to correct any data problems.

Section 6 - Site/Monitoring Visit

At least one member of the CoC Board will make an annual visit to each of the funded projects, and this responsibility may be split among multiple CoC Board members. In order to avoid conflict of interest, any member conducting visits shall not be a staff member of any agency participating in that project.

The monitoring will consist of:

- A tour of the facility, if appropriate.
- Review of the most recently submitted APR with discussion of goals and progress
- Review of at least one random program file
- Review of client satisfaction survey and/or a client interview scheduled prior to the visit
- Any other factor based on the Tri-County CoC's grantee risk assessment

The CoC Board member who conducted the visit will complete a Site Review Form and submit copies to the CoC Board and the grantee. If, based on performance, the committee has no further recommendations the results may be presented to the Tri-County CoC.

If the committee has performance concerns, a draft of recommendations will be presented to the CoC and timelines for corrections and follow-up visits will be established. Timelines for follow-up visits are anticipated to be 90 days or less, but will be defined on a case by case basis.

Section 8 - Renewal Projects

All eligible projects that meet the performance standards set forth by the CoC and have not been reallocated will be included in the annual application for renewal.

II. By Laws

BY-LAWS Tri-County Continuum of Care for Hunterdon, Sussex & Warren Counties

Article I – Name

Section 1: The name of this body shall be the Tri-County Continuum of Care for Hunterdon, Sussex, and Warren Counties (hereafter referred to as the Tri-County CoC).

Article II – Establishment

Section 1: The establishment of the Tri-County CoC derives from a decision reached by a planning body headed by the Directors of Human Services of Hunterdon, Sussex and Warren Counties on June 17, 2011. The Tri-County CoC is advisory to the respective Human Services Advisory Councils in all three counties.

Article III - Mission and Vision

Section 1 – Mission

The mission of the Tri-County CoC is to develop and revise comprehensive strategies to address and prevent homelessness in the Tri-County region.

Section 2 – Vision

The vision of the Tri-County CoC is that all residents at risk of or experiencing homelessness will have a safe, permanent and affordable place to live.

Article IV – Purpose

Section 1: To receive funding through the U.S. Department of Housing and Urban Development (HUD), under HEARTH (formerly, the McKinney Vento Homeless Assistance Act), geographic regions are required to establish and maintain a Continuum of Care.

A. The Tri-County CoC covers: all the cities and towns in the counties of Hunterdon, Sussex, and Warren.

B. The Tri-County CoC is designed to address critical issues related to homelessness through a coordinated community-based process of identifying and addressing needs utilizing not only HUD dollars, but also mainstream resources and other sources of funding. This is often achieved through the work of the local planning bodies that help comprise the Tri-County CoC. Avoiding duplication of efforts, leveraging resources, and coordinated planning are other purposes of the CoC.

Section 2: The Tri-County CoC assists in the coordination and development of services and housing for homeless and low-income persons with housing needs through planning, education and advocacy. To achieve this purpose the Tri-County CoC will seek to:

A. Enhance the knowledge of the service and housing providers to address the housing and service needs of homeless and formerly homeless persons.

B. Identify housing needs of homeless and low-income persons on an ongoing basis.

C. Identify the gaps and needs of homeless households and participate in the process of prioritizing local, state and federal funding to meet these needs

- D. Support planning and development of housing and services to meet prioritized needs within the Tri-County region.
- E. Participate in the operation of and ongoing planning for a coordinated access system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services and helps direct those persons to the appropriate providers.
- F. Evaluate outcomes of projects funded under Emergency Solutions Grant (ESG) and Continuum of Care (CoC) programs and report to HUD.
- G. Ensure that there is a single Homeless Management Information System (HMIS) for the Tri-County CoC area.
- H. Ensure that there is a regular point-in-time count of homeless persons in the Tri-County CoC region at intervals that are at least as frequent as required by HUD.

Article V. Full CoC Membership and Process

Section 1 – Membership

Membership is open to all interested community members and organizations. The CoC will particularly encourage participation by anyone serving the homeless or anyone who is currently homeless or has been homeless.

Agencies and Organizations seeking membership on the CoC should be members and participants in good standing on their county committees (i.e. CEAS, Housing Committee, or Homeless Continuation of Care).

To better facilitate coordination and planning efforts, members continue to participate in their local emergency services committees (CEAS, Housing or Homeless Continuation of Care). These local committees address community-level planning, identify service gaps, and plan and prioritize new and renewal homeless assistance projects. Local committees are responsible for planning and coordinating the county Point-in-Time Count and identifying all services to aid those experiencing or at risk of experiencing homelessness. Each local committee also assesses barriers to service delivery and special populations that may find it more or less difficult to access available services. Local committees are a subcommittee of the counties' Human Services Advisory Council (HSAC).

Section 2 – Nominations

Recommendations for CoC membership shall come from their local planning body and solicitation from the CoC. This list of nominations shall be sent to all CoC members at least ten (10) days before a general meeting.

Section 3 – Elections

Election to the CoC shall occur at a general meeting by vote of the existing CoC membership. While the CoC will strive to achieve consensus, the affirmative vote of a simple majority of members shall be required for the approval of any member.

Section 4 – CoC Meeting Frequency

The Tri-County CoC Full Membership will convene a general meeting at least semi-annually.

Section 5 – Resignations and Removal

Any member may resign at any time by giving written notice to the Collaborative Applicant of the CoC. In the event such notice is verbal it should be confirmed in writing, with appropriate confidentiality considered. Under extenuating circumstances, removal of a member may be executed based on consensus agreement of the CoC. Notice and treatment shall be facilitated by the Collaborative Applicant, and appropriate confidentiality shall apply throughout.

Section 6 – Management

The management and administration of the affairs of the CoC shall be vested in the CoC Board.

Section 7 – Purpose

The Tri-County CoC serves two purposes:

1. Development of a strategic plan to address the use of HUD resources and their interface with other funding sources to address and prevent homelessness. The Tri-County CoC is the body that provides a forum for discussing plans to end homelessness, identifying and ranking the community’s priority needs, educating the community on homeless issues, monitoring existing homeless programs and advocating on issues affecting people who are homeless or at risk of becoming homeless.
2. Submission of an application to HUD for McKinney Vento Homeless Assistance resources through an annual competition announced each year in HUD’s Notice of Funding Availability (NOFA)

Article VI – Structure

Section 1 – Collaborative Applicant

The Collaborative Applicant designated and approved by the CoC Board shall carry out the work of the Tri-County CoC in accordance with the direction of the CoC Board. These activities shall include:

1. Compiling and submitting the Tri-County CoC application
2. Compiling and submitting Point-In-Time Count and Housing Inventory Chart
3. Use HMIS to compile and submit System Performance Measures
4. Use HMIS to compile and submit Annual Homelessness Assessment Report
5. Facilitating a Coordinated Assessment and Referral System
6. Holding at least semiannual meetings of the full membership of the Tri-County CoC with formal, published agendas
7. Ensuring that new members are invited to the Tri-County CoC annually through a publicly accessible way
8. Appointing committees, subcommittees, or workgroups to carry out the tasks of the continuum as established by the CoC Board
9. Adopt and follow a written CoC Board selection process with code of conduct, conflict of interest and recusal process
10. Writing and issuing correspondence on behalf of the Tri-County CoC
11. Adopt and follow a written process for requesting, evaluating and prioritizing projects

The lead agency for the Tri-County CoC is Family Promise of Sussex County (FPSC).

Section 2 – Subcommittees

The Tri-County CoC Board has authorized and established the following permanent and ad hoc subcommittees to carry out specific work pertaining to Tri-County CoC tasks:

Permanent Subcommittees

- Veterans Master List Subcommittee
- Coordinated Assessment Subcommittee
- Data Subcommittee

Ad Hoc Subcommittee

- Youth Homelessness Subcommittee
- Tri-County CoC Board creates ad hoc committees as it determines necessary and at its discretion

Section 3 - Local County Homeless Coordination Committees

Each of the three counties making up the Tri-County CoC have a local Homeless Coordination Committee. The role of these local Homeless Coordination Committees is to provide regional planning and assessment of needs for each individual county.

A. Each of the local county Homeless Coordination Committees are eligible to have one or two representatives on the Tri-County CoC Board. The local county Homeless Coordination Committees are the core organizing and implementation entities for local implementation of housing and service initiatives intended to help to end homelessness. The Homeless Coordination Committees bring local providers and stakeholders together to collaboratively address homelessness and plan for housing and services in their region.

B. The Homeless Coordination Committees for each county work with the Tri-County CoC to complete the Point-in-Time count (PIT) and the Housing Inventory Chart (HIC).

C. Homeless Coordination Committee Representatives from each county share the planning and work being conducted in their communities as well as raise local issues of importance and concern the Tri-County CoC to address.

Article VII –Continuum of Care Board

To accomplish its mission and purpose, the Tri-County CoC will form a CoC Board to serve as the governing body of the Continuum.

Section 1- Number and Terms

The CoC Board shall have equal representation from the local continua and shall consist of not less than nine (9) members and not more than twelve (12) members.

Each County shall have a minimum of 3 members. Members of the CoC Board and shall serve a term of three (3) years or until their successors have been appointed or elected. Members will represent county government, public and private entities and will be designated by their local planning (CEAS, Housing Committee, or Homeless Continuation of Care) body. Members will include at least one representative from:

- County Human Services Department
- County Welfare Agency

Section 2 – Authority and Consultation

The CoC Board is authorized to make decisions on behalf of the Tri-County CoC. CoC Board members are expected to solicit input from their local continua and should be evidenced in local

CoC minutes. The CoC Board shall meet a minimum of four times annually. Additional meetings will be held as needed.

Section 3 – Voting

CoC Board members shall have voting rights. While the CoC Board will strive to achieve consensus, the affirmative vote of a simple majority of members shall be required for the approval of any matter. Member must either be present in-person, by phone, or represented by a designee established in writing prior to an CoC Board meeting in order to vote.

Section 4 – CoC Board Structure

The authority and consultative role of the CoC is established in the Tri-County CoC By-Laws.

The duties of the Tri-County CoC Board include, but are not limited to:

- The relaying of information between the Tri-County CoC and their local continua
- The identification of ways to coordinate and link resources across the Tri-County region that will help to avoid duplication and facilitate movement toward permanent housing and self-sufficiency
- The evaluation and monitoring of all HUD funded programs, including CoC and ESG
- Oversight of the HUD Homeless Assistance Grant application process
- The review and ranking of all proposed projects, both new and renewals, for HUD funding
- Participation in, and support of, the local Homeless Management Information System (HMIS). Data will be collected to better identify unmet needs, educate the community and used as a tool to advocate for additional resources
- Establishment of Ad-Hoc committees as necessary to address initiatives and planning

Article VIII – Annual Rating and Ranking of HUD Applications

Annually, or upon the release of U.S. Department of Housing and Urban Development (HUD) Continuum of Care Notice of Funding Available (NOFA), the CoC Board will establish the priority(s) for the Tri-County CoC HUD application.

The Tri-County CoC Collaborative Applicant will issue a Request for Letters of Intent from entities wishing to have projects considered for submission.

Project developers may be asked to present to the CoC Board and respond to questions about the proposal

The CoC Board will appoint a Selection Committee to score and rank applications. Projects, both new and renewals will be given a score and will be presented to the CoC Board for final approval. The committee will use the HUD APR as part of the evaluation of renewal projects.

Article IX - Full CoC Membership and Process

Section 1 – Membership

In compliance with HUD CoC program regulations, activities of the Tri-County CoC include the following:

- CoC Board will meet a minimum of four times per year
- Hold meetings of the full membership, at least once per year
- Make an annual invitation for new members to join

- Encourage and develop public understanding on homelessness and housing issues
- Provide advocacy on homelessness and housing issues
- Encourage housing and homeless programs to adopt best practices
- Strategize to fill in gaps in temporary and permanent housing, job training and development
- Ensure participation of grantees in the homeless management information system (HMIS)
- Establish performance targets, in consultation with providers, appropriate to each program type, monitor program performance and take action against poor performers
- Collect data on the needs of those experiencing homelessness and housing insecurity through the HMIS system, Point in Time Count and Housing Inventory
- Create and implement strategies and action steps to reduce and end homelessness in the Tri-County region

Section 2– Longitudinal System Analysis (LSA)

The Longitudinal System Analysis (LSA) is an annual report by HUD to the US Congress on the extent and nature of homelessness in America. It is based on information from HMIS and the CoC’s application for funding. The Tri-County CoC Collaborative Applicant is responsible for completing the local LSA. Client level data is collected through HMIS on the following reporting categories: Emergency Shelter (Families & Individuals), Transitional Housing (Families & Individuals) and Permanent Supportive Housing (Families & Individuals).

The Tri-County CoC will review the LSA data with an eye toward the following:

- Bed utilization rates
- Anomalies in data collected between similar programs
- Anomalies in data collected in recent period vs. previous ones
- Other discrepancies

The Tri-County CoC will work with provider agencies on data collection and quality. The Tri-County CoC lead will work with the Monarch Housing and NJ-HMFA to correct any data problems.

Article X: Grievance Committee

The purpose of the Tri-County CoC Grievance Policy is to ensure that there is a fair and accessible process for clients, providers and Committee members to file a grievance with the Tri-County CoC.

The Grievance Committee shall be made up of a minimum of three (3) members of the Tri-County CoC Board. Members shall be appointed by a vote of the Tri-County CoC Board. In all instances when a conflict of interest is present, parties shall recuse themselves from voting on and otherwise influencing the outcome of matters referred to the Grievance Committee.

The Grievance Applicant shall be acknowledged and notified of the appointment of a Grievance Committee within three (3) working days of the filing of the grievance complaint.

The Grievance Committee will meet within five (5) working days of receipt of the grievance documentation to review the complaint. The Grievance Applicant may be but, is not required to be present.

After meeting, deliberating, and rendering a decision on the grievance, notification of the grievance decision must be sent in writing, to the grievance applicant and to the Tri-County CoC Board within three (3) working days of the decision.

In all instances when a conflict of interest is present, parties shall recuse themselves from voting on and otherwise influencing the outcome of matters referred to the Grievance Committee.

Article XI- Conflict of Interest

All individuals and representatives of organizations who have a financial interest, other conflict of interest, or perceived conflict of interest in the Tri-County CoC, HUD application, or other topic of discussion, may not vote, nor participate in discussions related to CoC Board recommendations for funding as per Interim Rule 578,95 (All individuals and representatives of organizations who have a financial interest, other conflict of interest, or perceived conflict of interest in the Tri-County CoC, HUD application, or other topic of discussion, may not vote, nor participate in discussions related to CoC Board recommendations for funding as per Interim Rule 578,95 (<https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml#seqnum578.95>).

Article XII- Nondiscrimination Section

The members, officers, and persons served by the Tri-County CoC shall not discriminate against any CoC member because of race, color, religious creed, age, marital status, national origin, sex, sexual orientation, gender identity or gender expression, intellectual disability, or physical disability and will follow all state and federal regulations regarding nondiscrimination.

Article XIII- Amendments Section

Amendments to these By-Laws may be proposed in writing by any three (3) or more CoC members or by recommendation of the CoC Collaborative Applicant at any regular or special meeting and the same shall be voted upon by CoC Board at the next regular or special meeting, provided that at least ten (10) days written notice of the amendment and of the intention to vote thereon shall have been given to all members by mailing such notice to their addresses appearing on the records of the CoC.

A majority vote at a meeting of the Tri-County CoC Board is required to approve any amendments to these By Laws, provided that the proposed amendment(s) shall have been submitted in writing to each member at least 10 business days before action is taken by the CoC Board. A two-thirds (67%) vote of the CoC Board shall be required to adopt such amendment.

Article XIV: Review

The CoC Board will review the By-Laws annually for necessary additions and/or adjustments.

Adopted on: _____

Chair: _____

Vice Chair: _____