

Before Starting the CoC Application

The CoC Consolidated Application consists of three parts, the CoC Application, the CoC Priority Listing, and all the CoC's project applications that were either approved and ranked, or rejected. All three must be submitted for the CoC Consolidated Application to be considered complete.

The Collaborative Applicant is responsible for reviewing the following:

1. The FY 2018 CoC Program Competition Notice of Funding Available (NOFA) for specific application and program requirements.
2. The FY 2018 CoC Application Detailed Instructions which provide additional information and guidance for completing the application.
3. All information provided to ensure it is correct and current.
4. Responses provided by project applicants in their Project Applications.
5. The application to ensure all documentation, including attachment are provided.
6. Questions marked with an asterisk (*), which are mandatory and require a response.

1A. Continuum of Care (CoC) Identification

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1A-1. CoC Name and Number: GA-507 - Savannah/Chatham County CoC

1A-2. Collaborative Applicant Name: Chatham-Savannah Authority for the Homeless

1A-3. CoC Designation: CA

1A-4. HMIS Lead: Chatham-Savannah Authority for the Homeless

1B. Continuum of Care (CoC) Engagement

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1B-1. CoC Meeting Participants. For the period from May 1, 2017 to April 30, 2018, using the list below, applicant must: (1) select organizations and persons that participate in CoC meetings; and (2) indicate whether the organizations and persons vote, including selecting CoC Board members.

Organization/Person Categories	Participates in CoC Meetings	Votes, including selecting CoC Board Members
Local Government Staff/Officials	Yes	Yes
CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes
Law Enforcement	Yes	Yes
Local Jail(s)	Yes	No
Hospital(s)	No	No
EMS/Crisis Response Team(s)	No	No
Mental Health Service Organizations	Yes	Yes
Substance Abuse Service Organizations	Yes	Yes
Affordable Housing Developer(s)	Yes	Yes
Disability Service Organizations	Yes	No
Disability Advocates	Yes	No
Public Housing Authorities	Yes	Yes
CoC Funded Youth Homeless Organizations	Yes	No
Non-CoC Funded Youth Homeless Organizations	Yes	No
Youth Advocates	Yes	Yes
School Administrators/Homeless Liaisons	Yes	Yes
CoC Funded Victim Service Providers	No	No
Non-CoC Funded Victim Service Providers	Yes	No
Domestic Violence Advocates	Yes	No
Street Outreach Team(s)	Yes	No
Lesbian, Gay, Bisexual, Transgender (LGBT) Advocates	No	No
LGBT Service Organizations	No	No
Agencies that serve survivors of human trafficking	Yes	Yes
Other homeless subpopulation advocates	Yes	Yes
Homeless or Formerly Homeless Persons	Yes	Yes
Mental Illness Advocates	Yes	Yes
Substance Abuse Advocates	Yes	Yes

Other:(limit 50 characters)		
Veteran's Administration	Yes	Yes
Department of Family and Children Services	Yes	Yes

1B-1a. Applicants must describe the specific strategy the CoC uses to solicit and consider opinions from organizations and/or persons that have an interest in preventing or ending homelessness. (limit 2,000 characters)

The CoC solicits input from a variety of stakeholders. Homeless/formerly homeless, faith-based organizations, neighborhood associations, homeless service providers, local government, law enforcement, the business community, the school board, and the Housing Authority of Savannah are represented at quarterly public meetings and representatives of several aforementioned serve on the Board, including the PHA, the local public school board, and city council. The VA and DBHDD reps serve on the board also. A 'Savannah Vets at Home' workgroup meets monthly to address the issue of ending Veteran Homelessness and have created a By-Name list to assist in this process. Staff from Old Savannah City Mission (faith-based) serves on the board, the Executive Committee and the Membership/Rules committee. City of Savannah staff sits on the Needs Assessment Committee. Consumer input is gathered from surveys collected throughout the year and annual community meetings. City staff and the CoC collaborate to develop ESG performance standards and evaluations and to make ESG funding decisions.

**1B-2.Open Invitation for New Members. Applicants must describe:
 (1) the invitation process;
 (2) how the CoC communicates the invitation process to solicit new members;
 (3) how often the CoC solicits new members; and
 (4) any special outreach the CoC conducted to ensure persons experiencing homelessness or formerly homeless persons are encouraged to join the CoC.
 (limit 2,000 characters)**

A public invitation is extended annually to anyone interested in ending homelessness in our community. The local CoC consists of interested individuals and representatives from relevant organizations, and members are selected to ensure diverse representation of professional skills and experience, leadership capacity, influence capacity and organizational and special interest representation. Meeting notices and invitations to join are sent to the lead agency's email contact list; often, other agencies or contacts suggest other members and those suggestions are followed. Special outreach is made to the homeless and formerly homeless as we perform the regular duties of our agency. Interested parties contact the lead agency throughout the year for information and guidance as to how to become a part of the CoC; face to face meetings are held to explain the CoC and its processes and those who wish to join are invited to do so.

1B-3.Public Notification for Proposals from Organizations Not Previously Funded. Applicants must describe how the CoC notified the public that it will accept and consider proposals from organizations that have not previously received CoC Program funding, even if the CoC is not applying for new projects in FY 2018, and the response must include the date(s) the CoC publicly announced it was open to proposals. (limit 2,000 characters)

Funding opportunities are posted on the agency website. They are also announced in the local newspaper, the Savannah Morning News. Notices are sent to agencies representing the faith-based community, service providers, local government, the school board, etc., and are also sent to the CoC Lead Agency’s distribution list, which includes CoC-funded and non-funded agencies. Throughout the year, face-to-face meetings are held with new organizations that express an interest in participating, and they are provided information and technical assistance about the application and its requirements. The CoC is open to proposals from any entity that has not previously received funds in this competition, if they, at minimum, have an active Board of Directors and are a 501C3, comply with HUD priorities, have satisfactory experience in grants management and have a quality plan to serve the target population. They must also demonstrate the ability to leverage resources.

1C. Continuum of Care (CoC) Coordination

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1C-1. CoCs Coordination, Planning, and Operation of Projects. Applicants must use the chart below to identify the federal, state, local, private, and other organizations that serve individuals, families, unaccompanied youth, persons who are fleeing domestic violence who are experiencing homelessness, or those at risk of homelessness that are included in the CoCs coordination, planning, and operation of projects.

Entities or Organizations the CoC coordinates planning and operation of projects	Coordinates with Planning and Operation of Projects
Housing Opportunities for Persons with AIDS (HOPWA)	Yes
Temporary Assistance for Needy Families (TANF)	Yes
Runaway and Homeless Youth (RHY)	Yes
Head Start Program	Yes
Funding Collaboratives	Yes
Private Foundations	Yes
Housing and services programs funded through U.S. Department of Justice (DOJ) Funded Housing and Service Programs	Yes
Housing and services programs funded through U.S. Health and Human Services (HHS) Funded Housing and Service Programs	Yes
Housing and service programs funded through other Federal resources	Yes
Housing and services programs funded through State Government	Yes
Housing and services programs funded through Local Government	Yes
Housing and service programs funded through private entities, including foundations	Yes
Other:(limit 50 characters)	
Georgia/U.S. Department of Labor	Yes

1C-2. CoC Consultation with ESG Program Recipients. Applicants must describe how the CoC:
(1) consulted with ESG Program recipients in planning and allocating ESG funds; and
(2) participated in the evaluating and reporting performance of ESG Program recipients and subrecipients.
(limit 2,000 characters)

The ESG jurisdiction, the City of Savannah, works closely with the CoC lead agency to determine how funds will be allocated. The CoC lead provides HIC, PIT and other relevant HMIS data to the City; the two work collaboratively to determine standards, outcome targets and performance measures for ESG

recipients. Annual workshops to discuss the ESG funding process and community priorities are held. Agencies' HMIS performance and their success in meeting HUD priorities are reviewed. ESG funded agencies are also monitored annually by city staff. Feedback from CoC members is provided to the City through public hearings, workshops, and CoC members also complete surveys. ESG funds are allocated to individuals and families based on the gaps and priorities identified. ESG funds and CoC funds are used in conjunction to support a comprehensive continuum of housing and supportive services for the homeless or those at risk. The City and the CoC jointly review and score applications.

1C-2a. Providing PIT and HIC Data to Consolidated Plan Jurisdictions. Did the CoC provide Point-in-Time (PIT) and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions within its geographic area? Yes to both

1C-2b. Providing Other Data to Consolidated Plan Jurisdictions. Did the CoC provide local homelessness information other than PIT and HIC data to the jurisdiction(s) Consolidated Plan(s)? Yes

1C-3. Addressing the Safety Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors. Applicants must describe:

- (1) the CoC's protocols, including the existence of the CoC's emergency transfer plan, that prioritizes safety and trauma-informed, victim-centered services to prioritize safety; and**
 - (2) how the CoC maximizes client choice for housing and services while ensuring safety and confidentiality.**
- (limit 2,000 characters)**

SAFE Shelter, a 48-bed Domestic Violence facility, provides emergency shelter, 24-hour crisis hotline, support groups, outreach, case management, job assistance, financial assistance, transportation, legal advocacy, community education, teen dating violence education and awareness, and transitional housing. It addresses the safety needs of domestic violence, dating violence, sexual assault, and stalking survivors. The agency has reciprocal agreements with other dv facilities in the region; if the local facility is at capacity or it is too dangerous for the victim to stay in the area, they are relocated. Male victims are housed with hotel/motel vouchers. Clients may choose not to enter the shelter; outreach, counseling and support groups are still available to them. SAFE utilizes an HMIS alternative system to protect client anonymity. Non DV providers are trained to ask about personal safety and dv issues before entering client information into HMIS; those who may be at risk are connected to the DV service provider where they will be able to access safe housing and services, locally or in another area in the region. Coordinated Entry, centralized at the office of the CoC lead agency, helps to determine and secure the most appropriate response to each individual or family's housing needs. Prioritization

is determined based on physical danger, potential reoccurrence of violence, minors in the household and age. Each assessment produces a score and populates a confidential placement on the waitlist with de-identified information.

1C-3a. Applicants must describe how the CoC coordinates with victim services providers to provide annual training to CoC area projects and Coordinated Entry staff that addresses best practices in serving survivors of domestic violence, dating violence, sexual assault, and stalking. (limit 2,000 characters)

The CoC's Coordinated Entry system includes safety and planning protocols for this specific population. There is only one agency in the community that specifically serves victims of domestic violence and that is Safe Shelter. The agency provides Best Practice training at least once annually to the service provider community on how to serve survivors of domestic violence, dating violence, sexual assault, and stalking. Best practices in serving domestic violence survivors is also regularly covered in one or more of the service provider quarterly meetings. The CoC lead agency has staff out-stationed in the facility, and she presents at the agency case conference at least once annually. All training includes the Coordinated Entry staff.

1C-3b. Applicants must describe the data the CoC uses to assess the scope of community needs related to domestic violence, dating violence, sexual assault, and stalking, including data from a comparable database. (limit 2,000 characters)

Safe Shelter uses a comparable HMIS database, APRICOT, and provides statistics and other data about the issue in the local CoC. The statistics inform on community needs as they relate to dv and the issue of homelessness. Safe Shelter also hosts an annual resource fair in which community service providers participate. The agency has established safety and planning protocols, and the community's service provider organizations work with the agency to ensure those measures are in place when serving a domestic violence victim. The CoC lead agency staffs monthly in collaboration with the agency and coordinated entry staff. The local CoC prioritizes victims of domestic violence, etc., regardless of their score on the assessment tool, if that violence has occurred in the most recent six months in efforts to effectively address the unique needs of this population.

1C-4. DV Bonus Projects. Is your CoC No applying for DV Bonus Projects?

1C-5. PHAs within CoC. Applicants must use the chart to provide information about each Public Housing Agency (PHA) in the CoC's geographic areas:

- (1) Identify the percentage of new admissions to the Public Housing or Housing Choice Voucher (HCV) Programs in the PHA who were experiencing homelessness at the time of admission;**
- (2) Indicate whether the PHA has a homeless admission preference in its**

**Public Housing and/or HCV Program; and
 (3) Indicate whether the CoC has a move on strategy. The information
 should be for Federal Fiscal Year 2017.**

Public Housing Agency Name	% New Admissions into Public Housing and Housing Choice Voucher Program during FY 2017 who were experiencing homelessness at entry	PHA has General or Limited Homeless Preference	PHA has a Preference for current PSH program participants no longer needing intensive supportive services, e.g. move on?
Housing Authority of Savannah	22.00%	Yes-Public Housing	Yes

If you select "Yes--Public Housing," "Yes--HCV," or "Yes--Both" for "PHA has general or limited homeless preference," you must attach documentation of the preference from the PHA in order to receive credit.

1C-5a. For each PHA where there is not a homeless admission preference in their written policy, applicants must identify the steps the CoC has taken to encourage the PHA to adopt such a policy. (limit 2,000 characters)

Not applicable

1C-5b. Move On Strategy with Affordable Housing Providers. Does the CoC have a Move On strategy with affordable housing providers in its jurisdiction (e.g., multifamily assisted housing owners, PHAs, Low Income Tax Credit (LIHTC) developments, or local low-income housing programs)? Yes

Move On strategy description. (limit 2,000 characters)

The Housing Authority of Savannah's move on strategy operates in the following manner: as Shelter Plus Care and VASH participants no longer require supportive services and their vouchers are needed for other homeless individuals who qualify for the respective programs, their voucher is converted to a Housing Choice Voucher.

1C-6. Addressing the Needs of Lesbian, Gay, Bisexual, Transgender (LGBT). Applicants must describe the actions the CoC has taken to address the needs of Lesbian, Gay, Bisexual, and Transgender individuals and their families experiencing homelessness. (limit 2,000 characters)

Several measures have been put in place to ensure that anti-discrimination

policies are enforced within the community, and a CoC-wide anti-discrimination policy that applies to all projects regardless of funding has been implemented. The CoC prohibits discrimination based on age, sex, gender, LGBT status, marital status or disability, and agencies in the community are most often funded by CoC, ESG, and/or local government which prohibits discrimination in their written policies. CoC service provider agencies accommodate any group of persons presenting for assistance together regardless of the household composition. If a household voluntarily provides information regarding marital status, sexual orientation, or gender identity of one or more of its members, that information is collected but no inquiries about such are made. Appropriate referrals are made based on household needs, whether traditional or non-traditional, including referrals made to the local school system when minor children are included in the household. Agencies are also required to participate in trainings about diversity, inclusion, and transgender empowerment and CoC wide training with providers about how to effectively implement the HUD equal access final rule and the gender identity final rule regardless of sexual orientation or gender identity.

1C-6a. Anti-Discrimination Policy and Training. Applicants must indicate if the CoC implemented a CoC-wide anti-discrimination policy and conducted CoC-wide anti-discrimination training on the Equal Access Final Rule and the Gender Identity Final Rule.

1. Did the CoC implement a CoC-wide anti-discrimination policy that applies to all projects regardless of funding source?	Yes
2. Did the CoC conduct annual CoC-wide training with providers on how to effectively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity (Equal Access Final Rule)?	Yes
3. Did the CoC conduct annual CoC-wide training with providers on how to effectively implement Equal Access to Housing in HUD Programs in Accordance with an Individual's Gender Identity (Gender Identity Final Rule)?	Yes

1C-7. Criminalization of Homelessness. Applicants must select the specific strategies the CoC implemented to prevent the criminalization of homelessness in the CoC's geographic area. Select all that apply.

Engaged/educated local policymakers:	<input checked="" type="checkbox"/>
Engaged/educated law enforcement:	<input checked="" type="checkbox"/>
Engaged/educated local business leaders:	<input checked="" type="checkbox"/>
Implemented communitywide plans:	<input checked="" type="checkbox"/>
No strategies have been implemented:	<input type="checkbox"/>
Other:(limit 50 characters)	
	<input type="checkbox"/>
	<input type="checkbox"/>

	<input type="checkbox"/>
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- 1C-8. Centralized or Coordinated Assessment System. Applicants must:**
- (1) demonstrate the coordinated entry system covers the entire CoC geographic area;**
 - (2) demonstrate the coordinated entry system reaches people who are least likely to apply homelessness assistance in the absence of special outreach;**
 - (3) demonstrate the assessment process prioritizes people most in need of assistance and ensures they receive assistance in a timely manner; and**
 - (4) attach CoC’s standard assessment tool.**
- (limit 2,000 characters)**

Coordinated Entry is a collaboration of the multiple service provider agencies in the local CoC, including government and faith-based agencies. Services range from prevention of homelessness to permanent housing placements. The system, designed to streamline the intake, assessment, and referral processes, covers the CoC’s entire geographical area. It is designed to be easily accessible by individuals and families seeking housing or services, is well advertised, and includes a uniform, comprehensive and standardized assessment tool designed to ensure that homeless persons and persons at risk of homelessness are matched, as quickly as possible, with the intervention that will most efficiently and effectively end their homelessness. CE uses the VI-SPDAT. Special effort is made by outreach staff to identify the chronically homeless and engage them in services. They visit homeless camps and other known locations where the homeless congregate and pass out brochures and flyers describing available services seeking to reach those with the highest barriers to accessing assistance or those least likely to apply in the absence of special outreach. Currently centralized, it is accessible to all homeless individuals, including those with disabilities and those of limited English proficiency. All homeless individuals and families entering the system complete the VI-SPDAT, which considers the household’s situation and identifies the best type of housing intervention to address their situation. Homeless housing programs, including permanent supportive housing and transitional housing, fill available spaces in their programs from the master list of eligible households, the prioritization list. To ensure the neediest are housed first (and operating on the model of Housing First), the master list is prioritized based on VI-SPDAT scores, length of time homeless, severity of need, and local population priorities.

1D. Continuum of Care (CoC) Discharge Planning

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1D-1. Discharge Planning–State and Local. Applicants must indicate whether the CoC has a discharge policy to ensure persons discharged from the systems of care listed are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply (note that when "None:" is selected no other system of care should be selected).

Foster Care:	<input type="checkbox"/>
Health Care:	<input checked="" type="checkbox"/>
Mental Health Care:	<input checked="" type="checkbox"/>
Correctional Facilities:	<input checked="" type="checkbox"/>
None:	<input type="checkbox"/>

1D-2. Discharge Planning Coordination. Applicants must indicate whether the CoC actively coordinates with the systems of care listed to ensure persons who have resided in them longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply (note that when "None:" is selected no other system of care should be selected).

Foster Care:	<input checked="" type="checkbox"/>
Health Care:	<input checked="" type="checkbox"/>
Mental Health Care:	<input checked="" type="checkbox"/>
Correctional Facilities:	<input checked="" type="checkbox"/>
None:	<input type="checkbox"/>

1E. Continuum of Care (CoC) Project Review, Ranking, and Selection

Instructions

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1E-1. Project Ranking and Selection. Applicants must indicate whether the CoC used the following to rank and select project applications for the FY 2018 CoC Program Competition:

- (1) objective criteria;**
- (2) at least one factor related to achieving positive housing outcomes;**
- (3) a specific method for evaluating projects submitted by victim services providers; and**
- (4) attach evidence that supports the process selected.**

Used Objective Criteria for Review, Rating, Ranking and Section	Yes
Included at least one factor related to achieving positive housing outcomes	Yes
Included a specific method for evaluating projects submitted by victim service providers	No

1E-2. Severity of Needs and Vulnerabilities. Applicants must describe:

- (1) the specific severity of needs and vulnerabilities the CoC considered when reviewing, ranking, and rating projects; and**
- (2) how the CoC takes severity of needs and vulnerabilities into account during the review, rating, and ranking process.**

(limit 2,000 characters)

The severity of needs and vulnerabilities experienced by program participants as well as the housing and service needs of the local community were considered in the ranking and selection process. Permanent housing projects were ranked top priority with projects that provided low or no barrier access and projects that used a Housing First approach scoring higher than others that did not. The CoC also considered the populations being served, to include participants with current or past substance use, LGBTQ status, domestic violence victims, those with significant health and/or behavioral health challenges, high utilization of crisis/emergency services, coming from the streets or other unsheltered situations, particularly youth and children and vulnerability to victimization such as trafficking as well as low or no income; criminal histories were also considered. Input from participants, homeless/formerly homeless, providers and other stakeholders was also critical to the process. PSH projects for the chronically homeless top the priority list as they house the most vulnerable populations, and the only new projects submitted and considered for funding are those which increase the PSH inventory of the CoC.

1E-3. Public Postings. Applicants must indicate how the CoC made public:

- (1) objective ranking and selection process the CoC used for all projects (new and renewal);**
- (2) CoC Consolidated Application—including the CoC Application, Priority Listings, and all projects accepted and ranked or rejected, which HUD required CoCs to post to their websites, or partners websites, at least 2 days before the CoC Program Competition application submission deadline; and**
- (3) attach documentation demonstrating the objective ranking, rating, and selections process and the final version of the completed CoC Consolidated Application, including the CoC Application with attachments, Priority Listing with reallocation forms and all project applications that were accepted and ranked, or rejected (new and renewal) was made publicly available, that legibly displays the date the CoC publicly posted the documents.**

Public Posting of Objective Ranking and Selection Process		Public Posting of CoC Consolidated Application including: CoC Application, Priority Listings, Project Listings	
CoC or other Website	<input type="checkbox"/>	CoC or other Website	<input type="checkbox"/>
Email	<input type="checkbox"/>	Email	<input type="checkbox"/>
Mail	<input type="checkbox"/>	Mail	<input type="checkbox"/>
Advertising in Local Newspaper(s)	<input type="checkbox"/>	Advertising in Local Newspaper(s)	<input type="checkbox"/>
Advertising on Radio or Television	<input type="checkbox"/>	Advertising on Radio or Television	<input type="checkbox"/>
Social Media (Twitter, Facebook, etc.)	<input type="checkbox"/>	Social Media (Twitter, Facebook, etc.)	<input type="checkbox"/>

1E-4. Reallocation. Applicants must indicate whether the CoC has cumulatively reallocated at least 20 percent of the CoC’s ARD between the FY 2014 and FY 2018 CoC Program Competitions.

Reallocation: No

1E-4a. If the answer is “No” to question 1E-4, applicants must describe how the CoC actively reviews performance of existing CoC Program-funded projects to determine the viability of reallocating to create new high performing projects. (limit 2,000 characters)

The CoC actively reviews the performance of existing CoC Program-funded projects to determine the viability of reallocating. The CoC lead agency/collaborative applicant requires that CoC funded agencies provide their most recent audit, a program budget, and a program summary sheet which includes information about the number of individuals served over the previous year, the types of services made available to those served, and the number of staff and hours allotted to the program. Agencies also share their approach to the concepts of Housing First and Harm Reduction and how their practices have changed/evolved to incorporate Coordinated Entry (how they are prioritizing to

serve the most difficult first). A score sheet is then used to gauge agency performance and determine the need for reallocation.

1E-5. Local CoC Competition. Applicants must indicate whether the CoC:
(1) established a deadline for project applications that was no later than 30 days before the FY 2018 CoC Program Competition Application deadline—attachment required;
(2) rejected or reduced project application(s)—attachment required; and
(3) notify applicants that their project application(s) were being rejected or reduced, in writing, outside of e-snaps, at least 15 days before FY 2018 CoC Program Competition Application deadline—attachment required. :

(1) Did the CoC establish a deadline for project applications that was no later than 30 days before the FY 2018 CoC Program Competition Application deadline? Attachment required.	Yes
(2) If the CoC rejected or reduced project application(s), did the CoC notify applicants that their project application(s) were being rejected or reduced, in writing, outside of e-snaps, at least 15 days before FY 2018 CoC Program Competition Application deadline? Attachment required.	Did not reject or reduce any project
(3) Did the CoC notify applicants that their applications were accepted and ranked on the Priority Listing in writing outside of e-snaps, at least 15 before days of the FY 2018 CoC Program Competition Application deadline?	Yes

2A. Homeless Management Information System (HMIS) Implementation

Intructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2A-1. Roles and Responsibilities of the CoC and HMIS Lead. Does your CoC have in place a Governance Charter or other written documentation (e.g., MOU/MOA) that outlines the roles and responsibilities of the CoC and HMIS Lead? Attachment Required. Yes

2A-1a. Applicants must: Roles and Responsibilities of the CoC and the HMIS Lead can be found on Pgs 4-6; 2) The document type is GA HMIS By-laws
(1) provide the page number(s) where the roles and responsibilities of the CoC and HMIS Lead can be found in the attached document(s) referenced in 2A-1, and
(2) indicate the document type attached for question 2A-1 that includes roles and responsibilities of the CoC and HMIS Lead (e.g., Governance Charter, MOU/MOA).

2A-2. HMIS Policy and Procedures Manual. Does your CoC have a HMIS Policy and Procedures Manual? Attachment Required. Yes

2A-3. HMIS Vender. What is the name of the HMIS software vendor? Client Track

2A-4. HMIS Implementation Coverage Area. Using the drop-down boxes, applicants must select the HMIS implementation Coverage area. Statewide HMIS (multiple CoC)

2A-5. Bed Coverage Rate. Using 2018 HIC and HMIS data, applicants must report by project type:
(1) total number of beds in 2018 HIC;
(2) total beds dedicated for DV in the 2018 HIC; and

(3) total number of beds in HMIS.

Project Type	Total Beds in 2018 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ES) beds	381	48	169	50.75%
Safe Haven (SH) beds	0	0	0	
Transitional Housing (TH) beds	403	10	119	30.28%
Rapid Re-Housing (RRH) beds	0	0	0	
Permanent Supportive Housing (PSH) beds	765	0	576	75.29%
Other Permanent Housing (OPH) beds	4	0	0	0.00%

2A-5a. To receive partial credit, if the bed coverage rate is 84.99 percent or lower for any of the project types in question 2A-5., applicants must provide clear steps on how the CoC intends to increase this percentage for each project type over the next 12 months. (limit 2,000 characters)

Agencies are often unable or unwilling to commit staff, capacity, or financial resources to participate in an HMIS system when they are unable to see the benefit of doing so. In the next 12 months, the following steps will be taken to increase this percentage for each project type, 1) meeting with providers (majority faith-based) who have non-participating HMIS beds to show them the value to their organization of participating-including assisting in identifying specific needs and avoiding duplication of services, 2) Showing agencies that HMIS will allow them to be better able to track and allocate limited resources, and to monitor outcomes and program performance, 3) Providing some CoC funding (when available) for staff to assist with data entry.

2A-6. AHAR Shells Submission: How many 2017 Annual Housing Assessment Report (AHAR) tables shells did HUD accept? 4

2A-7. CoC Data Submission in HDX. Applicants must enter the date the CoC submitted the 2018 Housing Inventory Count (HIC) data into the Homelessness Data Exchange (HDX). (mm/dd/yyyy) 04/30/2018

2B. Continuum of Care (CoC) Point-in-Time Count

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2B-1. PIT Count Date. Applicants must enter the date the CoC conducted its 2018 PIT count (mm/dd/yyyy). 01/25/2018

2B-2. HDX Submission Date. Applicants must enter the date the CoC submitted its PIT count data in HDX (mm/dd/yyyy). 04/30/2018

2C. Continuum of Care (CoC) Point-in-Time (PIT) Count: Methodologies

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**2C-1. Change in Sheltered PIT Count Implementation. Applicants must describe any change in the CoC’s sheltered PIT count implementation, including methodology and data quality changes from 2017 to 2018. Specifically, how those changes impacted the CoC’s sheltered PIT count results.
 (limit 2,000 characters)**

Not applicable

2C-2. Did your CoC change its provider coverage in the 2018 sheltered count? No

2C-2a. If “Yes” was selected in 2C-2, applicants must enter the number of beds that were added or removed in the 2018 sheltered PIT count.

Beds Added:	0
Beds Removed:	0
Total:	0

2C-3. Presidentially Declared Disaster Changes to Sheltered PIT Count. Did your CoC add or remove emergency shelter, transitional housing, or Safe Haven inventory because of funding specific to a Presidentially declared disaster, resulting in a change to the CoC’s 2018 sheltered PIT count? No

2C-3a. If “Yes” was selected for question 2C-3, applicants must enter the number of beds that were added or removed in 2018 because of a Presidentially declared disaster.

Beds Added:	0
Beds Removed:	0
Total:	0

2C-4. Changes in Unsheltered PIT Count Implementation. Did your CoC change its unsheltered PIT count implementation, including methodology and data quality changes from 2017 to 2018? If your CoC did not conduct an unsheltered PIT count in 2018, select Not Applicable. No

2C-5. Identifying Youth Experiencing Homelessness in 2018 PIT Count. Did your CoC implement specific measures to identify youth experiencing homelessness in its 2018 PIT count? Yes

2C-5a. If “Yes” was selected for question 2C-5., applicants must describe: (1) how stakeholders serving youth experiencing homelessness were engaged during the planning process; (2) how the CoC worked with stakeholders to select locations where youth experiencing homelessness are most likely to be identified; and (3) how the CoC involved youth experiencing homelessness in counting during the 2018 PIT count. (limit 2,000 characters)

The CoC enlisted the aid of homeless youth and community youth stakeholders such as the youth outreach team and volunteers from Park Place Outreach (an emergency shelter for youth ages 11-17), Greenbriar Children’s Center (an agency with programs that serve runaway and homeless youth and runs an independent living program for youth ages 18-24), and the Savannah Chatham County Public School System homeless liaison. At least two meetings were held on site at each agency location to plan the PIT process and the methods to be employed to identify known locations of this population. The homeless liaison provided data about the number enrolled in the public school system and their living arrangements, including cars, shelters, and motels. The youth outreach team also identified locations where these youth would congregate.

2C-6. 2018 PIT Implementation. Applicants must describe actions the CoC implemented in its 2018 PIT count to better count: (1) individuals and families experiencing chronic homelessness; (2) families with children experiencing homelessness; and (3) Veterans experiencing homelessness. (limit 2,000 characters)

Coordinated Entry was implemented on 1/23/18. With its implementation, special effort has been made by outreach workers to identify chronically homeless individuals and families that are eligible for permanent supportive housing. Volunteers from the local VAMC were trained on how to complete the PIT client surveys and advised on where to notate an individual’s qualifying disability and episodes of homelessness. Sheltered as well as unsheltered individuals were encouraged to complete the longer survey form, which specifically asked questions that would assist in determining their eligibility. With the largest percentage of volunteers being VA Medical clinic staff, special

attention was made to identify veterans experiencing homelessness. Lastly, with information from the Homeless Liaison at the Board of Education, known locations where families and children were experiencing homelessness could possibly be located.

3A. Continuum of Care (CoC) System Performance

Instructions

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

3A-1. First Time Homeless as Reported in HDX. In the box below, applicants must report the number of first-time homeless as reported in HDX.

Number of First Time Homeless as Reported in HDX.	1,543
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3A-1a. Applicants must:

- (1) describe how the CoC determined which risk factors the CoC uses to identify persons becoming homeless for the first time;**
- (2) describe the CoC’s strategy to address individuals and families at risk of becoming homeless; and**
- (3) provide the name of the organization or position title that is responsible for overseeing the CoC’s strategy to reduce the number of individuals and families experiencing homelessness for the first time. (limit 2,000 characters)**

There was a 9% decrease in the number of persons entering in ES, TH, PH projects who became homeless for the first time. 1) Reducing first time homelessness is a priority; an annual community forum which involves mainstream service providers and the community at large identifies any conditions that might lead to homelessness. This includes discharges from jail, the foster care system, Department of Juvenile Justice, hospitals and behavioral health facilities. CSAH, the CoC’s lead agency, has staff that participate in discharge planning and links clients to resources so that they do not become homeless. United Way and the Department of Family and Children Services are collaborative partners and provide emergency assistance and other support services. 2) Risk factors for homelessness are identified and targeted through an eligibility screening process (overcrowding, doubled-up, no housing assistance, and frequent moves); fostering community partnerships, leveraging mainstream and private resources when possible, and providing financial assistance are other efforts employed to reduce this number. 3) The CoC’s lead agency, CSAH, oversees the CoC’s strategies to reduce the number of individuals and families experiencing homelessness for the first time. The agency works collaboratively with the community’s homeless service providers in this process.

- ### 3A-2. Length-of-Time Homeless as Reported in HDX. Applicants must:
- (1) provide the average length of time individuals and persons in families remained homeless (i.e., the number);**
 - (2) describe the CoC’s strategy to reduce the length-of-time individuals and persons in families remain homeless;**

**(3) describe how the CoC identifies and houses individuals and persons in families with the longest lengths of time homeless; and
 (4) provide the name of the organization or position title that is responsible for overseeing the CoC’s strategy to reduce the length of time individuals and families remain homeless.
 (limit 2,000 characters)**

(1)The average length of time persons remained homeless in ES and TH decreased from 82 bed nights to 69 bed nights, a 16% decrease. (2,3) HMIS is used to track lengths of stay. Outreach teams work with those living on the streets and or in places not meant for human habitation. Workgroups comprised of staff from the local Public Housing Authority (HAS), the local school system, and other service providers meet monthly to brainstorm and address issues that are barriers to housing entry. Changes in process are made based on information gleaned from these meetings. CSAH staff works with landlords to encourage program participation and assist in the leasing process. Also, the Georgia Housing Voucher Program (GHVP) uses the Housing First approach. Maximizing access to and utilization of mainstream benefits such as SSI and SSDI is another step. Shannon Bishop, ESQ. (attorney) helps to obtain IDs and other necessary paperwork such as DD214s, which helps to speed up the process. (4) CSAH oversees this strategy.

3A-3. Successful Permanent Housing Placement and Retention as Reported in HDX. Applicants must:

- (1) provide the percentage of individuals and persons in families in emergency shelter, safe havens, transitional housing, and rapid rehousing that exit to permanent housing destinations; and**
- (2) provide the percentage of individuals and persons in families in permanent housing projects, other than rapid rehousing, that retain their permanent housing or exit to permanent housing destinations.**

	Percentage
Report the percentage of individuals and persons in families in emergency shelter, safe havens, transitional housing, and rapid re-housing that exit to permanent housing destinations as reported in HDX.	28%
Report the percentage of individuals and persons in families in permanent housing projects, other than rapid re-housing, that retain their permanent housing or exit to permanent housing destinations as reported in HDX.	97%

3A-3a. Applicants must:

- (1) describe the CoC’s strategy to increase the rate at which individuals and persons in families in emergency shelter, safe havens, transitional housing and rapid rehousing exit to permanent housing destinations; and**
- (2) describe the CoC’s strategy to increase the rate at which individuals and persons in families in permanent housing projects, other than rapid rehousing, retain their permanent housing or exit to permanent housing destinations.
 (limit 2,000 characters)**

(1) The CoC’s strategy to increase the rate at which those in ES, TH exit to permanent housing destinations include: a) utilizing available data sources to drive local planning and action (i.e., the AHAR, PIT) b) prioritizing the chronically homeless for housing access c) targeting necessary resources to address identified needs d) strengthening collaborations e) outreaching and engaging landlords f) removing/lowering barriers to housing (i.e. credit issues,

evictions, criminal backgrounds) g) developing additional affordable housing units (CSAH's Tiny House project for chronically homeless veterans), and g) utilizing the Housing First concept.

(2) The CoC utilizes a number of strategies to increase the rate at which those in permanent housing projects retain their permanent housing or exit to permanent housing destinations: The HMIS system (data analysis) and case management follow-up are used to monitor. Monthly case conferences are held to discuss potential evictions as well as the possibility of the need to re-house clients in a program that might better meet their particular needs. Next steps are determined so that households are prevented from returning to homelessness. Another strategy used to minimize returns to homelessness is case manager contact with the households at the six-month exit interval and again at 12 months to ensure that any voluntary exits are to other permanent housing and not homelessness; case managers ensure that households have contact information for staff; they are encouraged to make contact if they encounter any issues that could possibly jeopardize their housing stability. The Housing First approach is also a strategy the CoC uses to reduce recidivism.

3A-4. Returns to Homelessness as Reported in HDX. Applicants must report the percentage of individuals and persons in families returning to homelessness over a 6- and 12-month period as reported in HDX.

	Percentage
Report the percentage of individuals and persons in families returning to homelessness over a 6- and 12-month period as reported in HDX	5%

3A-4a. Applicants must:

- (1) describe how the CoC identifies common factors of individuals and persons in families who return to homelessness;**
- (2) describe the CoC's strategy to reduce the rate of additional returns to homelessness; and**
- (3) provide the name of the organization or position title that is responsible for overseeing the CoC's strategy to reduce the rate individuals and persons in families returns to homelessness. (limit 2,000 characters)**

1) The local CoC identifies common factors by utilizing a standard assessment tool, the VI-SPDAT. The HMIS (data analysis) and case management also assist in identifying commonalities of those who return to homelessness. This assists in our efforts to monitor and minimize returns to homelessness and allows for the evaluation of programs to help in the identification and evaluation of barriers to household stabilization. 2) Monthly case conferences are held to discuss potential evictions from TH and PSH programs as well as the possibility of the need to re-house clients in a program that might better meet their particular needs. Next steps are determined so that households are prevented from returning to homelessness. Another strategy used to minimize returns to homelessness is case manager contact with the households at the six-month exit interval and again at 12 months to ensure that any voluntary exits are to other permanent housing and not homelessness; case managers ensure that households have contact information for staff; they are encouraged to make contact if they encounter any issues that might jeopardize their housing. Clients who exit shelters and transitional housing are provided with an array of services and support after exiting into the community or while receiving housing

assistance. Those services include individualized case management; education and life skills classes. Housing First is also a strategy utilized to reduce the rate of additional returns to homelessness; the immediate provision of housing that is subsequently combined with wrap-around support services is designed to end homelessness as quickly as possible and allow households an opportunity to pursue personal goals and improve their quality of life because their basic need for shelter has been met. 3) The lead agency of the CoC, CSAH, is responsible for overseeing the strategy to reduce recidivism rates. CSAH works collaboratively with the community's homeless service providers.

3A-5. Job and Income Growth. Applicants must:

- (1) describe the CoC's strategy to increase access to employment and non-employment cash sources;**
 - (2) describe how the CoC works with mainstream employment organizations to help individuals and families increase their cash income; and**
 - (3) provide the organization name or position title that is responsible for overseeing the CoC's strategy to increase job and income growth from employment.**
- (limit 2,000 characters)**

(1,2) Several strategies are used to increase household incomes, from both employment and non-employment cash sources: 1) Case managers link households to mainstream employment opportunities through the Workforce Investment Board (which provides subsidized employment programs) and the Georgia Department of Labor. Goodwill Industries and Vocational Rehabilitation are also partnering in these efforts. The availability of work supports such as child care and transportation assistance can also play a large role in whether a household will be able to obtain and sustain employment. The CoC lead agency employs a Life Skills Coordinator that teaches skills necessary to obtain employment. Non-employment income is increased by ensuring that all program participants are screened for eligibility and enrolled in mainstream resources such as SSI, SSDI, TANF, Medicaid and VA benefits. The CoC lead agency is co-located with DFCS, which provides access to such mainstream benefits as FS, TANF, and Medicaid. The Department of Behavioral Health and Disabilities (DBHDD) Region 5 employs SOAR trained staff qualified to expedite applications for mainstream benefits and lead agency staff also complete SOAR training. Training was offered in April 2018 and one staff member attended. Another training will be offered in December and another staff member will attend. 3) CSAH is responsible for overseeing the strategy to increase job and income growth from employment.

3A-6. System Performance Measures Data Submission in HDX. Applicants must enter the date the CoC submitted the System Performance Measures data in HDX, which included the data quality section for FY 2017 (mm/dd/yyyy) 05/29/2018

3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Instructions

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

- 3B-1. DedicatedPLUS and Chronically Homeless Beds. In the boxes below, applicants must enter:**
- (1) total number of beds in the Project Application(s) that are designated as DedicatedPLUS beds; and**
 - (2) total number of beds in the Project Application(s) that are designated for the chronically homeless, which does not include those that were identified in (1) above as DedicatedPLUS Beds.**

Total number of beds dedicated as DedicatedPLUS	0
Total number of beds dedicated to individuals and families experiencing chronic homelessness	92
Total	92

3B-2. Orders of Priority. Did the CoC adopt the Orders of Priority into their written standards for all CoC Program-funded PSH projects as described in Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing? Attachment Required. Yes

3B-2.1. Prioritizing Households with Children. Using the following chart, applicants must check all that apply to indicate the factor(s) the CoC currently uses to prioritize households with children during FY 2018.

History of or Vulnerability to Victimization (e.g. domestic violence, sexual assault, childhood abuse)	<input checked="" type="checkbox"/>
Number of previous homeless episodes	<input checked="" type="checkbox"/>
Unsheltered homelessness	<input checked="" type="checkbox"/>
Criminal History	<input type="checkbox"/>
Bad credit or rental history	<input type="checkbox"/>
Head of Household with Mental/Physical Disability	<input checked="" type="checkbox"/>

3B-2.2. Applicants must:

- (1) describe the CoC’s current strategy to rapidly rehouse every household of families with children within 30 days of becoming homeless;**
 - (2) describe how the CoC addresses both housing and service needs to ensure families successfully maintain their housing once assistance ends; and**
 - (3) provide the organization name or position title responsible for overseeing the CoCs strategy to rapidly rehouse families with children within 30 days of becoming homeless.**
- (limit 2,000 characters)**

1)The CoC is currently working on strategies to rapidly re-house families with children within 30 days of becoming homeless. Coordinated Entry is currently centralized at the CoC lead agency and each new homeless family is referred to the program director and assessed on the day that they present. The CoC does not have any RRH funds presently, but staff works with community housing providers and makes referrals to try to rehouse these families as quickly as possible based on their prioritization. CSAH and the HAS, the local public housing authority, has a set aside of 10 units in public housing specifically for families. For those units, the time frame from referral to lease up is 1 to 2 weeks. The local community has a critical shortage of affordable housing, and addressing this shortage is necessary to accomplish this goal. One strategy that is being considered is for the lead agency to delve into housing development and management and one project, targeted to chronically homeless veterans, is underway. Other strategies include engaging and recruiting private landlords and expediting unit inspections. 2) Although there is limited affordable housing, the CoC provides case management and stabilization services to ensure families successfully maintain their housing when assistance ends. Referrals and assistance to assure that participants secure government benefits for which they were eligible are provided. Interventions such as negotiation with landlords to address rent arrears or forestall eviction are used. Job training and work force supports to promote income growth are also included, where appropriate. Other referrals where deemed appropriate such as education, medical care, mental health services, substance abuse treatment, childcare, and/or transportation are made. 3) CSAH as lead agency is responsible for overseeing this effort but works collaboratively with its community partners.

3B-2.3. Antidiscrimination Policies. Applicants must check all that apply that describe actions the CoC is taking to ensure providers (including emergency shelter, transitional housing, and permanent supportive housing (PSH and RRH) within the CoC adhere to antidiscrimination policies by not denying admission to or separating any family members from other members of their family or caregivers based on age, sex, gender, LGBT status, marital status, or disability when entering a shelter or housing.

CoC conducts mandatory training for all CoC and ESG funded service providers on these topics.	<input type="checkbox"/>
CoC conducts optional training for all CoC and ESG funded service providers on these topics.	<input type="checkbox"/>
CoC has worked with ESG recipient(s) to adopt uniform anti-discrimination policies for all subrecipients.	<input type="checkbox"/>
CoC has worked with ESG recipient(s) to identify both CoC and ESG funded facilities within the CoC geographic area that may be out of compliance, and taken steps to work directly with those facilities to come into compliance.	<input type="checkbox"/>
CoC has sought assistance from HUD through submitting AAQs or requesting TA to resolve non-compliance of service providers.	<input type="checkbox"/>

3B-2.4. Strategy for Addressing Needs of Unaccompanied Youth Experiencing Homelessness. Applicants must indicate whether the CoC's strategy to address the unique needs of unaccompanied homeless youth includes the following:

Human trafficking and other forms of exploitation	Yes
LGBT youth homelessness	Yes
Exits from foster care into homelessness	Yes
Family reunification and community engagement	Yes
Positive Youth Development, Trauma Informed Care, and the use of Risk and Protective Factors in assessing youth housing and service needs	Yes

3B-2.5. Prioritizing Unaccompanied Youth Experiencing Homelessness Based on Needs. Applicants must check all that apply from the list below that describes the CoC's current strategy to prioritize unaccompanied youth based on their needs.

History or Vulnerability to Victimization (e.g., domestic violence, sexual assault, childhood abuse)	<input checked="" type="checkbox"/>
Number of Previous Homeless Episodes	<input checked="" type="checkbox"/>
Unsheltered Homelessness	<input checked="" type="checkbox"/>
Criminal History	<input type="checkbox"/>
Bad Credit or Rental History	<input type="checkbox"/>

**3B-2.6. Applicants must describe the CoC's strategy to increase:
(1) housing and services for all youth experiencing homelessness by providing new resources or more effectively using existing resources, including securing additional funding; and
(2) availability of housing and services for youth experiencing unsheltered homelessness by providing new resources or more effectively using existing resources.
(limit 3,000 characters)**

The CoC's strategies to increase housing and services for all youth experiencing homelessness include working with the SCCPSS homeless liaison, youth outreach teams, providers of youth services and volunteers to gather statistics and information about the population to more effectively serve this population. The CoC lead also works with the homeless liaison to try to increase family stability and promote family reunification efforts. The lead agency works with the two agencies in the community who provide services specifically to this population, Park Place Outreach and Greenbriar Children's Center (agency has a program and provides housing for youth aging out of foster care) to also promote family reunification, when possible. Another strategy is to secure/develop enough permanent housing to end youth homelessness. CoC service provider agencies met earlier in the year to strategize on applying for funds through the HUD Youth Homelessness Demonstration Program, designed to address systemic responses to youth

homelessness and significantly reduce the number of youth experiencing homelessness.

3B-2.6a. Applicants must:

- (1) provide evidence the CoC uses to measure both strategies in question 3B-2.6. to increase the availability of housing and services for youth experiencing homelessness;**
 - (2) describe the measure(s) the CoC uses to calculate the effectiveness of the strategies; and**
 - (3) describe why the CoC believes the measure it uses is an appropriate way to determine the effectiveness of the CoC's strategies.**
- (limit 3,000 characters)**

Evidence the CoC uses to measure efforts to increase the availability of housing and services for youth includes data collected through the HMIS system (PIT, AHAR) as well as information gathered from the school board homeless liaison, youth outreach teams, and youth service providers. The measure(s) the CoC uses to calculate the effectiveness of the strategies are in the process of being developed; with input from the service providers who provide services for runaway and homeless youth as well as the community's other homeless service providers, the CoC will develop measure(s) that it believes will be appropriate in determining the effectiveness of the CoC's strategies.

3B-2.7. Collaboration–Education Services. Applicants must describe how the CoC collaborates with:

- (1) youth education providers;**
 - (2) McKinney-Vento State Education Agency (SEA) and Local Education Agency (LEA);**
 - (3) school districts; and**
 - (4) the formal partnerships with (1) through (3) above.**
- (limit 2,000 characters)**

The CoC collaborates with the Savannah Chatham County Public School System (SCCPS) homeless liaison; she identifies homeless families and informs them of their eligibility for McKinney-Vento educational services; the liaison fills a required seat on the collaborative applicant's Board of Directors. The liaison participates in monthly community-wide case conferences and presents at least once each school year to ensure that homeless service providers are aware of school district policy, etc. The CoC and liaison work together to ensure that homeless students are not discriminated against. The liaison also presents McKinney-Vento information and requirements to school district personnel annually. The school board includes a student residency questionnaire in each student registration packet, which is given to each household to facilitate the process of identifying this target population. Included in the packet is a leaflet detailing eligible services under McKinney-Vento. CoC lead agency staff attend and participate in meetings held by the LEA.

3B-2.7a. Applicants must describe the policies and procedures the CoC adopted to inform individuals and families who become homeless of their eligibility for education services.

(limit 2,000 characters)

Providers of youth and homeless services inform participant families of their eligibility for McKinney-Vento services. Homeless service providers are required to ensure that homeless households or unaccompanied youth are immediately informed of the educational requirements of McKinney-Vento and their rights. Those who enter shelter is assigned a case manager, and as a part of the household case plan, the case manager ensures that school-age children are immediately enrolled in school. Parents are informed of the right to keep their children in the school previously attended before homelessness until the end of the school year. Transportation is arranged with the school board and bus tickets are provided until the request takes effect. Case managers' files are reviewed regularly and ISPs are checked to ensure that the requirements of McKinney-Vento are being met. The homeless liaison participates in monthly community wide case conferences and presents at these meetings at least once each school year, typically at the beginning, to ensure that homeless service providers are aware of school district policy. The CoC and liaison work together to ensure that safeguards are in place so that homeless students are not discriminated against. The liaison also presents McKinney-Vento information and requirements to school district personnel. The school board includes a student residency questionnaire in each student registration packet, which is given to each household to facilitate the process of identifying this target population. Included in the packet is a leaflet detailing eligible services under McKinney-Vento. The CoC and its collaborative partners identify eligible participants for CoC or ESG programs through the intake and assessment process for each provider. Referrals and linkages are made to the appropriate agency.

3B-2.8. Does the CoC have written formal agreements, MOU/MOAs or partnerships with one or more providers of early childhood services and supports? Select "Yes" or "No". Applicants must select "Yes" or "No", from the list below, if the CoC has written formal agreements, MOU/MOA's or partnerships with providers of early childhood services and support.

	MOU/MOA	Other Formal Agreement
Early Childhood Providers	No	Yes
Head Start	No	Yes
Early Head Start	No	Yes
Child Care and Development Fund	No	No
Federal Home Visiting Program	No	No
Healthy Start	No	No
Public Pre-K	No	Yes
Birth to 3 years	No	No
Tribal Home Visting Program	No	No
Other: (limit 50 characters)		

3B-3.1. Veterans Experiencing Homelessness. Applicants must describe the actions the CoC has taken to identify, assess, and refer Veterans

**experiencing homelessness, who are eligible for U.S. Department of Veterans Affairs (VA) housing and services, to appropriate resources such as HUD-VASH, Supportive Services for Veterans Families (SSVF) program and Grant and Per Diem (GPD).
(limit 2,000 characters)**

To identify, assess, and refer homeless Veterans for eligible Veterans Affairs Services, the CoC hosts a collaborative working group that meets twice a month; it is appropriately named the Savannah Vets @Home committee. The committee is comprised of 10 organizations and the Coordinated Entry program director that contribute to completing and working a by-name list of veterans identified in the community. CoC street outreach and PATH teams make appropriate linkages to the VAMC for eligible primary care medical services. Once eligible, the committee makes direct referrals to the local SSVF provider to be assessed for Rapid Rehousing Services. The veteran's committee also staffs eligible veterans from the HUD-VASH interest list that walk into the VAMC for services and are also identified through SSVF outreach efforts. In addition to housing resources offered through HUD-VASH and SSVF, the VAMC can also make referrals to the Ralph Johnson VA Medical Center in Charleston, SC for possible Grant and Per Diem options until housing comes available through HUD-VASH. Veterans are also linked to Coordinated Entry for housing placement through other community housing options. One option is the Cove at Dundee, specifically designed for chronically homeless veterans. Once complete, the project will house 72 veterans. By December 2018, 24 units will be complete.

3B-3.2. Does the CoC use an active list or by name list to identify all Veterans experiencing homelessness in the CoC? Yes

3B-3.3. Is the CoC actively working with the VA and VA-funded programs to achieve the benchmarks and criteria for ending Veteran homelessness? Yes

3B-3.4. Does the CoC have sufficient resources to ensure each Veteran experiencing homelessness is assisted to quickly move into permanent housing using a Housing First approach? No

3B-5. Racial Disparity. Applicants must: No
(1) indicate whether the CoC assessed whether there are racial disparities in the provision or outcome of homeless assistance;
(2) if the CoC conducted an assessment, attach a copy of the summary.

4A. Continuum of Care (CoC) Accessing Mainstream Benefits and Additional Policies

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

- 4A-1. Healthcare. Applicants must indicate, for each type of healthcare listed below, whether the CoC:**
- (1) assists persons experiencing homelessness with enrolling in health insurance; and**
 - (2) assists persons experiencing homelessness with effectively utilizing Medicaid and other benefits.**

Type of Health Care	Assist with Enrollment	Assist with Utilization of Benefits?
Public Health Care Benefits (State or Federal benefits, Medicaid, Indian Health Services)	Yes	Yes
Private Insurers:	Yes	Yes
Non-Profit, Philanthropic:	Yes	Yes
Other: (limit 50 characters)		
Chatham Care (targeted Healthcare for HIV/Aids)	Yes	Yes

- 4A-1a. Mainstream Benefits. Applicants must:**
- (1) describe how the CoC works with mainstream programs that assist persons experiencing homelessness to apply for and receive mainstream benefits;**
 - (2) describe how the CoC systematically keeps program staff up-to-date regarding mainstream resources available for persons experiencing homelessness (e.g., Food Stamps, SSI, TANF, substance abuse programs); and**
 - (3) provide the name of the organization or position title that is responsible for overseeing the CoC’s strategy for mainstream benefits. (limit 2,000 characters)**

1)The CoC lead agency is co-located in the Department of Family and Children Services building and works with DFCS staff to assist the homeless in applying for and receiving mainstream benefits, including Food Stamps and TANF. Agency staff works with Region 5 to assist consumers in applying for SSI, and the PATH team works with Recovery Place (private) and Gateway Behavioral Health in enrolling clients in substance abuse programs. Collaborations with several agencies facilitate health insurance enrollment for program participants. Those agencies include the Social Security Administration (Medicaid, Medicare), Curtis V. Cooper Primary Health Center, St. Mary’s Health Center, Medbank, and Chatham County Safety Net. 2) The CoC lead agency ensures that program staff have current information by accessing and providing

educational materials and staff participates by attending trainings in in-person and web-based trainings and workshops. 3)The CoC lead agency, CSAH, is responsible for addressing this performance measure.

4A-2.Housing First: Applicants must report:

- (1) total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition; and**
- (2) total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition that have adopted the Housing First approach—meaning that the project quickly houses clients without preconditions or service participation requirements.**

Total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition.	7
Total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition that have adopted the Housing First approach—meaning that the project quickly houses clients without preconditions or service participation requirements.	7
Percentage of new and renewal PSH, RRH, Safe-Haven, SSO non-Coordinated Entry projects in the FY 2018 CoC Program Competition that will be designated as Housing First.	100%

4A-3. Street Outreach. Applicants must:

- (1) describe the CoC’s outreach;**
- (2) state whether the CoC's Street Outreach covers 100 percent of the CoC’s geographic area;**
- (3) describe how often the CoC conducts street outreach; and**
- (4) describe how the CoC tailored its street outreach to persons experiencing homelessness who are least likely to request assistance. (limit 2,000 characters)**

1) Street Outreach, a mobile component, is designed to engage unsheltered individuals and families experiencing homelessness; 2) it covers 100% of the CoC’s geographical area of Savannah/Chatham County. 3) Primary outreach service hours are 8:00am to 5:00pm five days a week, but hours include early morning and late evening. Agencies make referrals and staff is sent to locations to identify, engage, and develop a trusting relationship with those living in vehicles, homeless camps, and other places not designed for human habitation. They are assisted in finding suitable shelter, including emergency shelter and/or transitional housing. The team spends approximately 90% of its time at feeding or clothing sites, city squares, and street/alley locations. 4) To reach the least likely to request assistance, outreach includes direct outreach and marketing, the use of 211, having access to Spanish speaking interpreters, and ensuring that locations providing homeless services are accessible for those with disabilities. In addition, referrals are made to the outreach manager from other community service providers, including CSAH's collaborative partners: Georgia Legal Services, Georgia Regional, J.C. Lewis Heath Center, the Savannah-Chatham County Police Department, Curtis V. Cooper Primary Health Care Center, and the Department of Family and Children Services. Lastly, there are self-referrals (persons facing eviction or living in condemned housing). The outreach manager initiates conversation with the potential client

and helps with shelter and necessities. He then does a brief intake and assessment to determine eligibility and needs as well as which available services are most appropriate and desirable to the client. If an individual agrees to participate in services, the outreach manager will call the service location and schedule an immediate meeting with the case manager for a full intake and deliver the individual/family to that location.

4A-4. Affirmative Outreach. Applicants must describe:

(1) the specific strategy the CoC implemented that furthers fair housing as detailed in 24 CFR 578.93(c) used to market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, gender identify, sexual orientation, age, familial status or disability; and

(2) how the CoC communicated effectively with persons with disabilities and limited English proficiency fair housing strategy in (1) above. (limit 2,000 characters)

1)To further fair housing and market housing and supportive services to eligible persons, the CoC ensures that access points are available throughout the community to reach diverse populations who are least likely to seek assistance, if not for special outreach. Mobile outreach teams work with the jails, hospitals, and a mobile emergency medical team to market housing and services to these populations. United Way 211 is also a marketing resource and partners with the CoC in the process. Service provider training on fair housing and anti-discrimination which includes gender identity, sexual identity, and LGBTQ populations occurs at least annually. 2)To ensure meaningful access for persons with disabilities, CSAH ensures that people with disabilities are afforded equal access to buildings and services. Reasonable efforts to (1) identify and remove barriers to access, including physical barriers, procedural barriers, and communication barriers; (2) take steps to implement accommodations so that all services, including communication, are as effective for people with disabilities as they are for others and that they are equally available to people with disabilities. Persons with disabilities have been/are accommodated in the following manners: providing a sign language interpreter for a deaf individual, using a service that can interpret for those with limited English proficiency, allowing the presence of a companion animal or support person for someone with an anxiety disorder, removing physical barriers for someone with mobility issues, and for someone who can't read, reading written information orally. Vital documents and materials are made available in the most frequently encountered language, LEP training for staff, bilingual staff and contracted translation service provider are all utilized to provide communicate effectively with persons with disabilities.

4A-5. RRH Beds as Reported in the HIC. Applicants must report the total number of rapid rehousing beds available to serve all household types as reported in the Housing Inventory Count (HIC) for 2017 and 2018.

	2017	2018	Difference
RRH beds available to serve all populations in the HIC	0	0	0

4A-6. Rehabilitation or New Construction No

Costs. Are new proposed project applications requesting \$200,000 or more in funding for housing rehabilitation or new construction?

4A-7. Homeless under Other Federal Statutes. No
Is the CoC requesting to designate one or more of its SSO or TH projects to serve families with children or youth defined as homeless under other Federal statutes?

4B. Attachments

Instructions:

Multiple files may be attached as a single .zip file. For instructions on how to use .zip files, a reference document is available on the e-snaps training site:
<https://www.hudexchange.info/resource/3118/creating-a-zip-file-and-capturing-a-screenshot-resource>

Document Type	Required?	Document Description	Date Attached
1C-5. PHA Administration Plan–Homeless Preference	No	PHA Administratio...	09/10/2018
1C-5. PHA Administration Plan–Move-on Multifamily Assisted Housing Owners' Preference	No	PHA Move On strategy	09/13/2018
1C-8. Centralized or Coordinated Assessment Tool	Yes	Coordinated Asses...	09/13/2018
1E-1. Objective Criteria–Rate, Rank, Review, and Selection Criteria (e.g., scoring tool, matrix)	Yes	CoC Project Scori...	09/14/2018
1E-3. Public Posting CoC-Approved Consolidated Application	Yes		
1E-3. Public Posting–Local Competition Rate, Rank, Review, and Selection Criteria (e.g., RFP)	Yes		
1E-4. CoC's Reallocation Process	Yes	CoC's Reallocatio...	09/13/2018
1E-5. Notifications Outside e-snaps–Projects Accepted	Yes	Notification of P...	09/13/2018
1E-5. Notifications Outside e-snaps–Projects Rejected or Reduced	Yes	Notification of R...	09/10/2018
1E-5. Public Posting–Local Competition Deadline	Yes	Public Posting	09/13/2018
2A-1. CoC and HMIS Lead Governance (e.g., section of Governance Charter, MOU, MOA)	Yes	GA HMIS By-laws	09/10/2018
2A-2. HMIS–Policies and Procedures Manual	Yes	HMIS Policy and P...	09/10/2018
3A-6. HDX–2018 Competition Report	Yes	2018 HDX Competit...	09/13/2018
3B-2. Order of Priority–Written Standards	No	PSH Written Stand...	09/14/2018

3B-5. Racial Disparities Summary	No		
4A-7.a. Project List–Persons Defined as Homeless under Other Federal Statutes (if applicable)	No		
Other	No		
Other	No		
Other	No		

Attachment Details

Document Description: PHA Administration Plan-Homeless Preference MOU

Attachment Details

Document Description: PHA Move On strategy

Attachment Details

Document Description: Coordinated Assessment Tool

Attachment Details

Document Description: CoC Project Scoring Tool

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description: CoC's Reallocation Process

Attachment Details

Document Description: Notification of Projects Accepted

Attachment Details

Document Description: Notification of Rejection

Attachment Details

Document Description: Public Posting

Attachment Details

Document Description: GA HMIS By-laws

Attachment Details

Document Description: HMIS Policy and Procedures Manual

Attachment Details

Document Description: 2018 HDX Competition Report

Attachment Details

Document Description: PSH Written Standards of Assistance

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Submission Summary

Ensure that the Project Priority List is complete prior to submitting.

Page	Last Updated
1A. Identification	09/11/2018
1B. Engagement	09/11/2018
1C. Coordination	09/12/2018
1D. Discharge Planning	09/11/2018
1E. Project Review	09/13/2018
2A. HMIS Implementation	09/11/2018
2B. PIT Count	09/11/2018
2C. Sheltered Data - Methods	09/11/2018
3A. System Performance	09/11/2018
3B. Performance and Strategic Planning	09/13/2018
4A. Mainstream Benefits and Additional Policies	09/12/2018
4B. Attachments	Please Complete

Submission Summary

No Input Required

MEMORANDUM OF UNDERSTANDING

Chatham Savannah Authority for the Homeless And The Housing Authority of Savannah

Whereas, **The Chatham Savannah Authority for the Homeless (CSAH)** is a 501 C3 non-profit organization concerned with providing permanent housing options, case management and supportive services for homeless persons through its unified case management system, and

Whereas, **The Housing Authority of Savannah (HAS)** is a public-body politic which provides decent, safe and sanitary housing for Savannah's low- and very low income populations while also focusing on the educational, job training and economic self-sufficiency needs of the residents of public housing neighborhoods, and

Whereas, **The Chatham Savannah Authority for the Homeless and The Housing Authority of Savannah** are both members of the local Continuum of Care Consortium and express commitment to reducing the time individuals and families spend in shelters, and

Whereas, **CSAH** and **HAS** desire to enter into a Memorandum of Understanding to provide a housing opportunity in the public housing neighborhoods of Yamacraw Village and Simon Frazier Homes for pre-screened families with income, referred by **CSAH** who are prepared to move out of local shelters.

Now, therefore be it resolved that:

CSAH will:

1. Verify that households are homeless.
2. Pre-screen households to estimate eligibility based on HUD requirements for public housing.
3. Assist the pre-screened applicants through the application process with **HAS**.
4. Maintain documentation of each household referred to **HAS**.
5. Provide on-going counseling including site visits, to address any issues while the households are transitioning to multi-family apartments and adjusting to following all the terms and conditions of the **HAS** Lease.
6. Maintain all information shared by **HAS** with **CSAH** in confidence. Any requests for release of information will be referred to **HAS**.

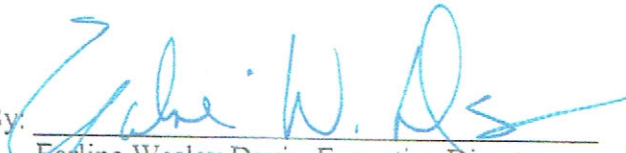
HAS will:

1. Accept applications from **CSAH** pre-screened homeless families only (this MOU excludes single person households).
2. Reserve up to five (5) units in both Yamacraw Village and Simon Frazier

- Homes for **CSAH** referred applicants, as available.
3. Conduct all eligibility screening, inspections and certifications as required per HUD regulations.
 4. Contact **CSAH** if a household is in jeopardy of losing housing.
 5. Maintain all information shared by **CSAH** with **HAS** in confidence. Any requests for release of information will be referred to **CSAH**.
 6. Residents housed per this agreement shall be responsible to comply with all terms and conditions of the *HAS Lease* which include but are not limited to: monthly rent, security deposit, utility bills and other charges that may be assessed for lease violations.

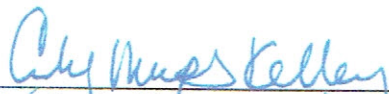
This Agreement becomes effective on September 1, 2017. It may be modified at any time by written consent of both parties and may be cancelled by either party with 30 days written notice.

The Housing Authority of Savannah

By: 
Earline Wesley Davis, Executive Director

Date: 9/25/2017

Chatham Savannah Authority for the Homeless

By: 
Cindy Murphy Kelley, Executive Director

Date: 9/21/17

4-III.C. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

Local Preferences [24 CFR 982.207; HCV p. 4-16]

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

PHA Policy

No local preferences have been established. However, as Shelter Plus Care and VASH participants no longer require supportive services and their vouchers are needed for other homeless individuals who qualify for the respective programs, their voucher will be converted to a Housing Choice Voucher.

Income Targeting Requirement [24 CFR 982.201(b)(2)]

HUD requires that extremely low-income (ELI) families make up at least 75 percent of the families admitted to the HCV program during the PHA's fiscal year. ELI families are those with annual incomes at or below the federal poverty level or 30 percent of the area median income, whichever number is higher. To ensure this requirement is met, a PHA may skip non-ELI families on the waiting list in order to select an ELI family.

Low-income families admitted to the program that are "continuously assisted" under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

PHA Policy

The PHA will monitor progress in meeting the income targeting requirement throughout the fiscal year. Extremely low-income families will be selected ahead of other eligible families on an as-needed basis to ensure the income targeting requirement is met.

2018 GA-507-PROJECT PERFORMANCE & COC PRIORITY SCORING CRITERIA
Permanent Supportive Housing

Applicant Agency _____

HUD PROJECT NAME _____

HUD Project Type:

- Permanent Supportive Housing Transitional Housing SSO only

Project Threshold Criteria		Scoring	
<p>Agency demonstrates they have the capacity to carry out and implement the proposed project. Eligible <u>renewing</u> projects are considered to have met threshold unless other information is available to the contrary.</p>		<p>Pass/Fail</p>	

Performance Criteria	Goal	Points Available	Scoring	Data Source	Reviewer Score
<p>1. <u>ALL Projects</u>-Did the agency expend (100%) all grant funds awarded for last grant award period.</p>	<p>100% of award</p>	<p>10</p>	<p>95% or greater spent=10 90-94% spent=9 85-89% spent=8 80-84% spent=7 Below 79%=0</p>	<p>Applicant App or Financial Report</p>	<p>_____</p>

Performance Criteria	Goal	Points Available	Scoring	Data Source	Reviewer Score
<p>2. All Projects-Has the recipient Maintained consistent Quarterly Drawdowns for the most recent Grant Term related to this renewal project request?</p>	YES	10	YES=10 NO=0	LOCCs drawdown	_____
<p>3. All Projects-HMIS Data Quality-% Of Universal Data Elements with 'don't know Or refused or missing data in HMIS greater than 5% overall</p>	less than 5%	10	0-5%=10 6-10%=5 10% or more=0	HMIS data report	_____
<p>4. PERMANENT HOUSING PROJECT The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within 13 to 24 months</p>	less than 5%	10	0-5%=10 5-10%=5 10% or more	HMIS System Performance Report	_____
<p>5. Housing Stability % of persons who remained in the PH program as of end of year or exited to PH during year</p>	80%	20	80% or greater=20 75-79%=15 70-74%=5 Below 70%=0	Applicant App	_____

Performance Criteria	Goal	Points Available	Scoring	Data Source	Reviewer Score
<u>6. Increased Income</u> % of stayers who gained or increased (earned) income From entry to exit	20%	20	20%=20 15-20%=10 Less than 15%=0		_____
<u>7. Increased Income</u> % of stayers who gained or increased income (non-employment/mainstream benefits) entry to exit	56% or greater	20	56% or greater=20 46-55%=18 26-45%=15 Below 25%=0		_____

2018 GA-507-PROJECT PERFORMANCE & COC PRIORITY SCORING CRITERIA

Transitional Housing Projects

Project Threshold Criteria		Scoring	
<p>Agency demonstrates they have the capacity to carry out and implement the proposed project. Eligible renewing projects are considered to have met threshold unless other information is available to the contrary.</p>		<p>Pass/Fail</p>	

Performance Criteria	Goal	Points Available	Scoring	Data Source	Reviewer Score
<p>1. All Projects- Did the agency expend (100%) all grant funds awarded for last grant award period.</p>	<p>100% of award</p>	<p>10</p>	<p>95% or greater spent=10 90-94% spent=9 85-89% spent=8 80-84% spent=7 Below 79%=0</p>	<p>Applicant App or Financial Report</p>	<p>_____</p>
<p>2. All Projects- Has the recipient Maintained consistent Quarterly Drawdowns for the most recent Grant Term related to this renewal project request?</p>	<p>YES</p>	<p>10</p>	<p>YES=10 NO=0</p>	<p>LOCCs drawdown</p>	<p>_____</p>

Performance Criteria	Goal	Points Available	Scoring	Data Source	Reviewer Score
3. All Projects - HMIS Data Quality-% Of Universal Data Elements with 'don't know Or refused or missing data in HMIS greater than 5% overall	less than 5%	10	0-5%=10 6-10%=5 10% or more=0	HMIS data report	_____
4. TRANSITIONAL HOUSING PROJECT The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within 13 to 24 months	less than 5%	10	0-5%=10 5-10%=5 10% or more	HMIS System Performance Report	_____
5. Housing Stability % of persons who remained in the PH program as of end of year or exited to PH during Year	80%	20	80% or greater=20 75-79%=15 70-74%=5 Below 70%=0	Applicant App	_____
6. Increased Income % of stayers who gained or increased(earned or mainstream benefit) income From entry to exit	20%	20	20%=20 15-20%=10 Less than 15%=0		_____
7. Exits to Permanent Housing % of persons who exited to permanent housing (subsidized or non-subsidized) during the program Year	80%	20	80% or greater=20 70%-80%=10 Below 70%=0		_____

2018 GA-507-PROJECT PERFORMANCE & COC PRIORITY SCORING CRITERIA
Supportive Services Only (SSO)

Project Threshold Criteria		Scoring	
<p>Agency demonstrates they have the capacity to carry out and implement the proposed project. Eligible renewing projects are considered to have met threshold unless other information is available to the contrary.</p>		<p>Pass/Fail</p>	

Performance Criteria	Goal	Points Available	Scoring	Data Source	Reviewer Score
<p>1. All Projects-Did the agency expend (100%) all grant funds awarded for last grant award period</p>	<p>100% Of award</p>	<p>10</p>	<p>95% or greater spent=10 90-94% spent=9 85-89% spent=8 80-84% spent=7 Below 79%=0</p>	<p>Applicant App or Financial Report</p>	<p>_____</p>
<p>2 All Projects-Has the recipient Maintained consistent Quarterly Drawdowns for the most recent Grant Term related to this renewal project request?</p>	<p>YES</p>	<p>10</p>	<p>YES=10 NO=0</p>	<p>LOCCs drawdown</p>	<p>_____</p>

Performance Criteria	Goal	Points Available	Scoring	Data Source	Reviewer Score
3. All Projects-HMIS Data Quality-% Of Universal Data Elements with 'don't 5% know Or refused or missing data in HMIS greater than 5% overall	less than 5%	10	0-5%=10 6-10%=5 10% or more=0	HMIS data report	_____
4. Program Targets/Prioritizes priority target populations The project incorporates working with special populations (Veterans, Chronically homeless, youth ages 24 and below and/or victims of domestic violence)	50% or greater	20	50% or greater=20 20-49%= 10 less than 20%=0	Project Application	_____
5. Project Participants Were the number of project participants served consistent with the number proposed In project application	100%	20	100%=20 60-99%=10 Below 60%=0	Project Application	_____
6. Program defined Performance Measures What was the actual % of persons who accomplished this measure	80%	20	80% or greater=20 51-79%=10 Below 51%=0	HMIS report	_____

NEW PROJECTS RATING TOOL

Print Report Card

Print Blank Template

New Projects

Rating Complete

0%

Instructions on Awarding Points

POINTS AWARDED
MAX POINT VALUE

Project Name:

Organization Name:

Project Type:

Project Identifier:

RATING FACTOR

EXPERIENCE

A. Describe the experience of the applicant and sub-recipients (if any) in working with the proposed population and in providing housing similar to that proposed in the application.

B. Describe experience with utilizing a Housing First approach. Include 1) eligibility criteria; 2) process for accepting new clients; 3) process and criteria for exiting clients. Must demonstrate there are no preconditions to entry, allowing entry regardless of current or past substance abuse, income, criminal records (with exceptions of restrictions imposed by federal, state, or local law or ordinance), marital status, familial status, actual or perceived sexual orientation, gender identity. Must demonstrate the project has a process to address situations that may jeopardize housing or project assistance to ensure that project participation is terminated in only the most severe cases.

C. Describe experience in effectively utilizing federal funds including HUD grants and other public funding, including satisfactory drawdowns and performance for existing grants as evidenced by timely reimbursement of sub-recipients (if applicable), regular drawdowns, timely resolution of monitoring findings, and timely submission of required reporting on existing grants.

Experience Subtotal 0 out of 30

DESIGN OF HOUSING & SUPPORTIVE SERVICES

A. Extent to which the applicant

1. Demonstrates understanding of the needs of the clients to be served.

2. Demonstrate type, scale, and location of the housing fit the needs of the clients to be served

3. Demonstrate how clients will be assisted in obtaining and coordinating the provision of mainstream benefits

4. Demonstrate type and scale of the all supportive services, regardless of funding source, meet the needs of the clients to be served.

5. Establish performance measures for housing and income that are objective, measurable, trackable, and meet or exceed any established HUD, HEARTH or CoC benchmarks.

B. Describe the plan to assist clients to rapidly secure and maintain permanent housing that is safe, affordable, accessible, and acceptable to their needs.

C. Describe how clients will be assisted to increase employment and/or income and to maximize their ability to live independently.

Design of Housing & Supportive Services Subtotal 0 out of 25

TIMELINESS

A. Describe plan for rapid implementation of the program documenting how the project will be ready to begin housing the first program participant. Provide a detailed schedule of proposed activities for 60 days, 120 days, and 180 days after grant award.

Timeliness Subtotal 0 out of 10

FINANCIAL

A. Project is cost-effective - comparing projected cost per person served to CoC average within project type.

B. Audit

1. Most recent audit found no exceptions to standard practices

2. Most recent audit identified agency as 'low risk'

3. Most recent audit indicates no findings

C. Documented match amount

D. Budgeted costs are reasonable, allocable, and allowable

Financial Subtotal 0 out of 45

PROJECT EFFECTIVENESS

Coordinated Entry Participation - 95% of entries to project from CE referrals

Project Effectiveness Subtotal 0 out of 5

OTHER AND LOCAL CRITERIA

Other and Local Criteria Subtotal 0 out of 0

TOTAL SCORE 0 out of 115

Weighted Rating Score 100 out of 100

PROJECT FINANCIAL INFORMATION

Coc funding requested

Amount of other public funding (federal, state, county, city)

Amount of private funding

TOTAL PROJECT COST

NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED TAB

Janice Sheffield

From: Janice Sheffield <janice@homelessauthority.org>
Sent: Friday, August 31, 2018 10:41 AM
To: 'Pyoungquist@unionmission.org'; 'Josua Rine'; 'Lynn Coleman'; 'Bonny Taylor'; 'Tom McBeth'; 'Terry Tolbert'; 'Margo King'; 'Libby Tyre'; 'pwaye@Savannahga.Gov'; 'Kerri Reid'; 'Stacey Murray'; 'khagin@gatewaybhs.org'; 'Selena Kelly'
Cc: 'Cindy Kelley'; 'Janice Sheffield'
Subject: FY 2018 Savannah/Chatham County CoC Application

Good morning,

Thank you for your submission of an application for the Savannah-Chatham County Continuum of Care (CoC) funding for FY 2018. As the Collaborative Applicant for HUD funding, after review, CSAH wishes to notify you that your project application(s) submitted to the CoC have been accepted for submission in the upcoming HUD NOFA application, which is due September 18, 2018. Project ranking information will be shared with each of you shortly; I will be sending the Tier 1 and Tier 2 chart to you as well. This information will also be posted on CSAH's website.

As you recall, your projects were due to me by August 17th. I will be in contact with each of you regarding any corrections or adjustments that will need to be made, if necessary, before the grant submission. If you have any questions, you may contact me at (912) 790-3400. CSAH looks forward to partnering with each of you this upcoming year as we all work to end homelessness in our community.

Best Regards,
Janice

Janice E. Sheffield
Associate Director
Chatham-Savannah Authority for the Homeless (CSAH)
janice@homelessauthority.org
Phone: (912) 790-3400 Fax: (912) 790-3403
www.homelessauthority.org

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Janice Sheffield

From: Janice Sheffield <janice@homelessauthority.org>
Sent: Tuesday, July 03, 2018 4:54 PM
To: 'Josua Rine'; 'Pyoungquist@unionmission.org'; 'LaMonica Graham'; 'Gena Taylor'; 'Pam Gordon'; 'Tom McBeth'; 'Terry Tolbert'; 'Margo King'; 'Katie Hagin'; 'Kerri Reid'; 'Patricia Waye'; 'Lynn Coleman'; 'Bonny Taylor'; 'libby.tyre@dca.ga.gov'
Cc: 'Cindy Kelley'
Subject: NOFA overview and deadlines
Attachments: Continuum of Care Overview and Due dates FY 2018.doc

All,

Attached is a preliminary overview along with due dates for this year's NOFA. You will receive another email soon which will include the presentation date for project applicants.

Please pay particular attention to the timeline at the bottom of the document.

As always, if you have any questions, please feel free to call me.

Thanks,
Janice

Janice E. Sheffield
Associate Director
Chatham-Savannah Authority for the Homeless (CSAH)
janice@homelessauthority.org
Phone: (912) 790-3400 Fax: (912) 790-3403
www.homelessauthority.org

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**CONTINUUM OF CARE
FY2018 NOFA APPLICATION
OVERVIEW AND DUE DATES**

The following are the Renewal Projects (in no particular order) to be submitted in this year's NOFA competition:

<u>Applicant Name</u>	<u>Project Name</u>	<u>Project Component</u>
(1) Union Mission	Eagles Landing SHP	Permanent Housing
(2) HAS	Shelter + Care	Permanent Housing
(3) Greenbriar	Supportive Housing	Transitional Housing
(4) EOA	Tom D. Austin House	Transitional Housing
(5) CSAH	Unified Case Mgmt	Supportive Services Only
(6) GHFA (DCA)	Union Mission S + CR	Permanent Housing
(7) City of Savannah	S + C (City 54)	Permanent Housing
(8) CSAH	SSO-CE	Coordinated Entry
(9) CSAH	HMIS Lead 2017	HMIS

- As in previous years, the Continuum of Care must rank/prioritize all projects (except CoC Planning projects) in Tier 1 and/or Tier 2.
- The only components to be funded in FY 2018 are permanent housing, transitional housing, Supportive Services Only and HMIS (no homeless prevention component).
- HUD is only considering new projects where funding has been made available through reallocation, bonus or DV (domestic violence) bonus. NO new Supportive Services projects will be considered (except SSO-CE).
- Reallocated funds may be used for dedicated HMIS projects and SSO projects for a centralized or coordinated assessment system, in addition to projects that are 100% dedicated to the chronically homeless, rapid rehousing projects, and joint transitional and rapid rehousing projects.

TIMELINE: The Collaborative Applicant must submit the FY 2018 NOFA application in e-snaps by 8pm Tuesday, September 18, 2018.

- **There will be no Agency presentations this year**
- **Friday, August 17, 2018-** All completed **Project Applications** must be submitted in E-snaps to the CoC lead agency.
- **Wednesday, September 4, 2018-** CoC Notification to Project Applicants of acceptance, rejection, or reduction in the FY2018 competition
- **Tuesday, September 18, 2018- HUD Due Date-**The Collaborative Applicant will submit the Continuum of Care **Consolidated Application, Project Applications and Priority Listings** to HUD via E-snaps by September 16, 2018.

Continuum of Care

ANNOUNCEMENTS

[2018 NOFA Information](#)

[FY 2017 GA 507 Continuum of Care Application](#)

[FY 2017 GA 507 Continuum of Care Project Rankings](#)

September 26, 2017 - The NOFA application is due for submission on September 28, 2017

Revised Project Application Deadline

Please note that all applications are now due by 5:00 pm, August 28, 2017, and should be sent electronically to Janice E Sheffield at janice@homelessauthority.org

July 14, 2017 HUD released the 2017 NOFA on July 14th. The application process for this year's NOFA has not yet been finalized, but is in the process of being developed; key documents and other information will be linked below as they become available. All 2017 prospective applicants, both new and renewal, are advised to check the website frequently for updates. Please notify Janice E. Sheffield at janice@homelessauthority.org of the intent to apply by **August 18, 2017**.

[FY 2017 Continuum of Care \(CoC\) Program Competition: Funding Availability](#)

Savannah-Chatham County Continuum of Care 2017 application for New Permanent Housing projects.

In accordance with the U.S. Department of Housing and Urban Development's FY2017 Notice of Funding Availability (NOFA), the Chatham-Savannah Authority for the Homeless, lead agency for the Savannah-Chatham County Continuum of Care, seeks requests for proposals for New Permanent Supportive housing projects. Funding in the competition is limited, but some reallocated funds and a permanent supportive housing bonus will be available for permanent housing projects. New permanent housing projects must follow the Housing First model, participate in the community's Coordinated Entry system, follow the CoC's established priorities for the admission of homeless individuals and families, and utilize mainstream resources whenever possible to provide supportive services. The competition opened on July 14, 2017 and will close on September 28, 2017. Applications will be available for download below. Please contact Janice Sheffield at janice@homelessauthority.org for any questions or additional information. **Applications are due by 5:00pm, September 7, 2017**, and should be sent electronically to Janice E. Sheffield at janice@homelessauthority.org.

[2016 CoC Consolidated Application](#)

[2016 Project Rankings](#)

The Savannah-Chatham County Continuum of Care (referred to as "Continuum" or "CoC") is the county-wide plan to address homelessness in Chatham County Georgia. The plan represents key stakeholder organizations and individuals utilizing a systems approach. This system organizes, funds and provides outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; and permanent housing. It also includes community awareness and education, homeless/at-risk of homeless prevention strategies and efforts to reduce the overall number of homeless individuals.

The Chatham-Savannah Authority for the Homeless (CSAH) is the lead agency for CoC plan implementation. The twenty-one (21) member Continuum of Care Board is responsible for making key strategy decisions for the CoC. CSAH in collaboration with the Continuum of Care Board serves as the U. S. Department of Housing and Urban Development's (HUD's) recognized decision making body for the Continuum rule at 24 CFR 578, Subpart B, entitled "Establishing and Operating a Continuum of Care."

ANNOUNCEMENTS

SEPTEMBER 18, 2018

THE NOFA Application must be submitted electronically in E-snaps to HUD by 8:00pm, September 18, 2018.

PROJECT APPLICATION DEADLINE

All Project applications are due by 5:00p.m., Friday, August 17, 2018, and should be sent electronically through E-snaps to GA-507 CoC.

On June 28, 2018, HUD released the 2018 NOFA. Key documents and additional information will be linked below as they become available. All 2018 prospective applicants, both new and renewal, are advised to check this website frequently for updates. Please notify Janice E. Sheffield at janice@homelessauthority.org of the intent to apply by **August 3, 2018**.

FY2018 Continuum of Care (CoC) Program Competition: Funding Availability

<https://www.hudexchange.info/resource/5719/fy-2018-coc-program-nofa>

Savannah-Chatham County Continuum of Care 2018 application for NEW Permanent Housing Projects

In accordance with the U.S. Department of Housing and Urban Development's FY2018 Notice of Funding Availability (NOFA), the Chatham-Savannah Authority for the Homeless, lead agency for the Savannah-Chatham County Continuum of Care, seeks requests for proposals (RFPs) for New Permanent Supportive housing projects. Funding in the competition is limited, but a permanent supportive housing bonus will be available for permanent housing projects. New permanent housing projects must follow the Housing First model, participate in the community's Coordinated Entry system, follow the CoC's established priorities for the admission of homeless individuals and families, and utilize mainstream resources whenever possible to provide supportive services. The competition will close on September 18, 2018. Applications will be available for download at <http://www.homelessauthority.org>. Please contact Janice Sheffield at janice@homelessauthority.org for any questions or additional information. **Applications are due by 5:00pm, Friday August 17, 2018**, and should be sent electronically to Janice E. Sheffield at janice@homelessauthority.org.

AFFIDAVIT OF PUBLICATION
SAVANNAH MORNING NEWS

STATE OF GEORGIA,
COUNTY OF CHATHAM

Personally appeared before me, Alaina Fincher, to me known who being sworn, deposes and says: That he/she is the authorized agent of GateHouse Media, Georgia Holdings, Inc., d. b. a. Savannah Morning News in Chatham County, Georgia;

That he/she is authorized to make affidavits of publication on behalf of said company; That said newspaper is of general circulation in said county and in the area adjacent thereto; That said newspaper in the legal organ for publication in Chatham County, Georgia; That he/she has reviewed the regular editions of the Savannah Morning News, published:

July 25, 2018

July 29, 2018

_____, 2018

_____, 2018

And finds that the following advertisement to wit:



appeared in each of said editions.

Sworn to and subscribed before me;

Al Fincher

(Deponent)

This 30 day of July, 2018

Eugene J Cronk

Notary Public; Chatham County, GA.

EUGENE J CRONK
Notary Public, Chatham County, Georgia
My Commission Expires January 24, 2022



GA HMIS BY-LAWS 2018

Georgia HMIS Steering Committee

By-Laws

Section I: Name

The name of the organization shall be Georgia Homeless Management Information System (GA HMIS) Steering Committee. This committee serves the following Continua of Care (CoC), known collectively as the “GA HMIS Collaborative”:

GA-500	Atlanta
GA-501	Georgia Balance of State
GA-502	Fulton County
GA-503	Athens-Clarke County
GA-504	Augusta-Richmond County
GA-506	Marietta-Cobb County
GA-507	Savannah-Chatham County
GA-508	DeKalb County

Section II: Purpose

The GA HMIS Collaborative operates a Homeless Management Information System (HMIS) to record and store client -level information about the numbers, characteristics, and needs of persons who use homeless housing and supportive services and for persons who receive assistance for persons at risk of homelessness.

The Governance Structure and Authorities for the CoC’s HMIS are prescribed by federal statutes and HUD regulations that can be accessed at <https://www.hudexchange.info/resource/1491/hmis-tools-governance-structure-steering-committee/> -regulations –and -notices/. The HMIS is used to aggregate data about the extent and nature of homelessness over time; produce an unduplicated count of homeless persons; understand patterns of service use; and measure the effectiveness of homeless assistance projects and programs. Data produced is used for planning and education.

Because the CoCs listed in Section I share a single Homeless Management Information System (HMIS), it is crucial for the HMIS to be managed collaboratively and transparently, and for uniform priorities and standards to be established across the whole HMIS implementation, for the good of all participating CoCs. These By-laws outline the authority of the GA HMIS Steering Committee, the governance roles, responsibilities, and relationship of Georgia’s aforementioned participating CoCs and the HMIS Lead Agency. The Georgia Housing and Finance Authority (Authority), the grantee has designated the Georgia Department of Community Affairs (DCA) to serve as the HMIS Lead for the Georgia HMIS Collaborative.

The purpose of the GA HMIS Steering Committee (Committee) is to collaboratively manage the implementation and administration of the shared HMIS in accordance with the requirements established by the U.S. Department of Housing and Urban Development (HUD), its Federal partners, and the shared priorities of the GA HMIS Collaborative. Additionally, the Steering Committee strives to identify ways to help provider agencies record, report, and improve their services through the shared HMIS by serving as a conduit between CoCs and the HMIS Lead.

The benefits derived from utilizing the HMIS system include: Understanding the extent and scope of homelessness, producing an unduplicated count, identifying service gaps, informing program design and policy decisions, and development of a forum for addressing community-wide issues.

Section III: Responsibilities

Responsibilities of the Continua of Care

Each CoC listed in Section I has agreed to participate in the statewide HMIS implementation through a Memoranda of Agreement (MOA) with DCA on behalf of the GHFA, and has agreed to collaboratively govern HMIS through these by-laws. The responsibilities listed below will be carried out in accordance with each CoC's governing processes. At a minimum, each CoC agrees to carry out the following responsibilities:

- Adopt and/or re-affirm adoption of these by-laws and participate in an annual review and request updates to these by-laws;
- Appoint two voting members, in writing, as specified in Section IV, to serve on the GA HMIS Steering Committee to provide oversight of the implementation and represent the Continuum in GA HMIS decision-making;
- Accept the HMIS software chosen by the GA HMIS Collaborative as the designated software for its Continuum;
- Designate the HMIS Lead chosen by the GA HMIS Collaborative to manage the Continuum's HMIS and apply for/receive HUD HMIS funding on behalf of their CoC;
- Require that all agencies and users in their respective CoC jurisdiction comply with the GA HMIS policies and procedures of the GA HMIS Collaborative;
- Ensure that service providers in their respective CoC jurisdiction adequately meet the minimum HMIS participation requirements as established by the GA HMIS Steering Committee;
- Designate at least one user in the CoC to be a CoC HMIS Administrator, who would be authorized to have administrative-level access to the data for the specific CoC for purposes of providing oversight and user support, as well as to monitor agency compliance with Federal Data Standards;
- Direct all requests and concerns to the HMIS Lead, including, but not limited to, software vendor management, HMIS enhancements, system errors, and project status to allow the HMIS Lead to more efficiently manage communications and centralize feedback and input across all participating CoCs;
- Require that participating agency users meet the minimum training requirements established by the GA HMIS Steering Committee;
- Participate in the commitment of funding the implementation of the GA HMIS project;
- Ensure HMIS privacy and security protocols are integrated into agency policies and practices;
- Conduct ongoing data analysis and evaluation to help drive planning and funding decisions; and
- Prepare, review, and submit all HUD required Continuum-level reports (i.e., Housing Inventory Chart, Point in Time Count, Annual Homeless Assessment Report, and System Performance Measures) with support from the HMIS Lead.

CoCs may individually identify additional priorities, policies, procedures, and requirements for their respective CoC, so long as no conflict is created with the priorities, policies, procedures, and requirements created by the GA HMIS Steering Committee under authority of these by-laws, and provided they assume the burden of enforcing any additional requirements.

Responsibilities of the HMIS Lead

The HMIS Lead agrees, at a minimum, to carry out the following responsibilities to the best of its ability:

Project Management

- Oversee the day-to-day operations and management of the GA HMIS;
- Enter into an Memorandum of Agreement with each CoC for the provision of HMIS services;
- Obtain and maintain GA HMIS Participation Agreements with all participating agencies and users;
- Administer HUD HMIS awards for all Continua participating in the GA HMIS Collaborative, in accordance with the MOAs between GHFA and these jurisdictions and in concert with these by-laws;
- Provide staff support for GA HMIS Steering Committee meetings;
- Develop and maintain a process for the Committee to submit, track, review, and approve requests for system enhancements and development projects; and
- Develop and maintain a tracking and communication process that will allow the Committee to stay informed about vendor activities related to compliance, enhancements, bug fixes, and new development projects.
- Develop a process for software development request.

System Functionality

- Enter into a formal contractual relationship with the GA HMIS vendor that outlines the requirements and responsibilities of the vendor, including those required by HUD and its Federal partners through its data and technical standards, rules, notices, etc.;
- Monitor the vendor's software system for compliance with all current data and technical standards, statute, regulation, and notices;
- Monitor the vendor's software system for compliance with any other required standards set by other federal partner and state programs that require HMIS use;
- Provide assistance to the GA HMIS Collaborative that the GA HMIS Steering Committee deems necessary to ensure that the comparable database used statewide by Victim Service Providers meets the minimum standards set forth by HMIS regulations and notices;
- Monitor that the software vendor provides reasonable development timeframes, provides CoCs with the ability to produce all HUD required reports, including related reports needed to assess data quality, timeliness, and completeness; and,
- Provide CoC Administrators, the CoC-identified user who is authorized to have administrative-level access to the data in a specific CoC for purposes of providing oversight and user support with tools necessary to monitor agency compliance with Federal Data Standards, including reports and access to raw agency data; and
- Ensure that the software continues to meet the needs of the GA HMIS Collaborative.

Policies and Procedures

- Develop and maintain GA HMIS Policies and Procedures in accordance with HUD requirements and notices and CoC needs for approval by the GA HMIS Steering Committee;
- Develop and maintain a privacy plan, security plan, and data quality plan for the HMIS in accordance with HUD requirements for approval by the GA HMIS Steering Committee; As specified by MOA with each CoC, assist CoCs in monitoring participating agency compliance with security, privacy, and confidentiality policies; and
- Develop minimum general participation and timeliness standards for agencies for approval by the GA HMIS Steering Committee.

Training and Technical Assistance

- Develop minimum training requirements for participating agency users for approval by the GA HMIS Steering Committee;
- Ensure required basic training is available to participating agency staff and accessible on a regular basis;
- Identify and provide additional training that may be needed to ensure good data quality for HUD and the federal partners;
- Ensure technical assistance and help desk support is available and accessible to participating agencies on a regular basis; and
Ensure CoCs have access to reports, technical assistance, and training required to develop a data quality improvement plan when necessary.

Responsibilities of the GA HMIS Steering Committee

Except where stated otherwise in these by-laws, the GA HMIS Steering Committee has authority on all matters regarding HMIS and is responsible for providing oversight of the HMIS implementation, and for providing counsel, guidance, and assistance to the staff members, governing bodies, and contributing providers within each of the eight (8) participating CoCs. The Steering Committee agrees, at a minimum, to carry out the following responsibilities to the best of its ability:

- Participate in decision making and approve system-wide priorities, policies, protocols, procedures, and other requirements needed to implement the GA HMIS, including but not limited to Standard Operating Procedures, privacy policies, security policies, data quality standards, timeliness standards, and provide input and direction to the HMIS Lead;
- Collaborate on goals and objectives that support shared HMIS activities;
- Disseminate information to the respective CoCs about GA HMIS, the Steering Committee, and HMIS Lead activities, policies, procedures, and training;
- Provide counsel, guidance, and assistance to HMIS staff within their respective CoC;
- Identify, develop, and implement strategies for improving HMIS coverage and data quality throughout the geographic region of the participating Georgia CoCs;
- Provide support to individual CoCs in their efforts to identify and eliminate potential barriers to the use and improvement of the GA HMIS;

- Confirm that the comparable database used statewide by Victim Service Providers meets the minimum standards set forth by HMIS regulations and notices;
- Monitor for the collaborative availability of funding for the implementation of the GA HMIS project.

Section IV: Membership and Officers

Committee Composition

The GA HMIS Steering Committee is a partnership of representatives from each of the participating Continua of Care listed in Section I, and the HMIS Lead, and contains one class of member. Each CoC shall have equal voting rights except as may be provided elsewhere in these by-laws. The Committee is composed of the following:

1. Two representatives from each Continuum of Care (one from the Collaborative Applicant, and one with a solid technical understanding of HMIS, such as an HMIS power user). Each CoC shall designate their two representatives by whatever means established within that CoC and provide those names to the HMIS Committee Chairs in writing within the timeframes stated elsewhere in these by-laws.
2. One representative from the HMIS Lead Agency, appointed by the chief official of the HMIS Lead.

Appendix A lists the appointments by each CoC and by the HMIS Lead. Necessary changes to Appendix A do not constitute a change to these by-laws and do not require Committee approval.

Terms of Office

Each Steering Committee member shall serve with no term limit. Each CoC can change their appointees at any time to ensure their membership is reflective of the CoC needs as stated in the section below.

Appointment of Committee Members

Each CoC and the HMIS Lead is responsible for the appointment of a designee to the HMIS Steering Committee Chairs in writing.

Unanticipated vacancies will be filled as outlined in Section IX.

Officers

The GA HMIS Steering Committee shall have two co-chairs, one elected chair and one chair being filled by the HMIS Lead. Any member of the GA HMIS Steering Committee is eligible to serve as a chair. The elected chair position shall be filled by a simple majority vote. The newly elected chair shall assume office at the close of that meeting and shall serve a term of one year. Elected chairs may only serve a maximum of two full terms consecutively. If an officer is elected due to a need to fill a vacancy, that officer will serve for the remainder of the vacating officer's term. This partial term will not count toward the consecutive term limitation. The current designated HMIS Lead shall fill the non-elected co-chair position without any term limitations until such time that a new HMIS Lead is designated by the GA HMIS collaborative.

The elected chairperson's duties will be to:

1. Serve as primary point of contact for the Steering Committee;
2. Co-facilitate and preside over GA HMIS Steering Committee meetings with the HMIS Lead;
3. Facilitate the development of meeting agendas with the HMIS Lead; and
4. Encourage communication and participation of all Steering Committee members.
5. Monitor effectiveness of the HMIS Lead.

The HMIS Lead's duties as a co-chair will be to:

1. Record and distribute meeting minutes;
2. Co-facilitate and preside over GA HMIS Steering Committee meetings with the elected chairperson;
3. Maintain the committee and subcommittee appointment lists;
4. Co-develop and disseminate the meeting agendas; and
5. Distribute meeting notices

The Chairpersons shall be ex-officio members of all committees created by this Steering Committee.

Section V: Subcommittees

Any member of the HMIS Steering Committee is eligible to serve on any subcommittees and are approved by a simple majority vote of the GA HMIS Steering Committee Members.

Standing Committees

Governance and Policy Subcommittee

The Governance and Policy Subcommittee is responsible for keeping these by-laws and any related appendices up to date. In addition, it will assist the HMIS Lead in policy and procedures development and maintenance by providing feedback during initial drafts. At a minimum, this means conducting an annual review of the by-laws, appendices, and all related policies and procedures and recommending changes to the Steering Committee for approval.

The Governance and Policy Subcommittee is also responsible for working with the HMIS Lead and other relevant organizations to develop and approve a template for MOAs for approval by the respective CoCs. The purpose of this is to ensure that each CoC has the same minimum requirements in their MOA and that CoCs do not add requirements that conflict with the goals of the GA HMIS Collaborative as a whole.

Data Collection, Reporting & Evaluation Subcommittee

The Data Collection, Reporting & Evaluation Subcommittee members work in conjunction with the HMIS Lead in reviewing, evaluating and analyzing data collection and processes not only for HUD programs, but also other federal partners such as Veterans Affairs and Health and Human Services, and other faith-based and non-profit agencies not participating in HMIS. This committee will make recommendations to the GA HMIS Steering Committee to encourage potential areas of change/improvement. This committee will also provide input on any updates to the Data Quality Plan.

Ad Hoc Subcommittees

The GA HMIS Steering Committee may create ad hoc subcommittees as it deems necessary to carry out the work of the Georgia HMIS Implementation. Ad hoc committee participation is not restricted to GA HMIS Steering Committee members and may include any individual from the at-large GA HMIS collaborative. However, at a minimum, each ad hoc committee must have a chair, and that chair must be an existing GA HMIS Steering Committee member. If non-GA HMIS Steering Committee members will be included in an ad hoc subcommittee, the GA HMIS Steering Committee will develop a process for nominating a slate of candidates from all Participating CoCs and a process for approving subcommittee members. The creation of any ad hoc meetings will be documented in the minutes of the meeting in which the subcommittee was created.

Section VI: Meetings and Attendance

General Meetings

At a minimum, the GA HMIS Steering Committee will conduct six meetings per year, with increased frequency when needed. A minimum of two weeks advance notice of meeting dates, times, and locations will be provided to all GA HMIS Steering Committee members, as well as posted on the <https://dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing/homeless-management-information-system-hmis> website. The meetings for the following calendar year will be scheduled during the last meeting of each calendar year so that members may plan accordingly.

Any action required or permitted to be taken by the GA HMIS Steering Committee may be taken without a meeting, if all members of the Steering Committee unanimously consent to taking action without a meeting. If consent is not collected at a meeting (i.e. consent is collected through electronic means instead), written consents must be filed with the minutes of the proceedings of the Steering Committee. Action by written consent has the same force and effect as the in-person vote of the Steering Committee members. Written consent includes electronic written communication such as email.

Members must maintain adequate participation to ensure continuity in the process. Remote access to the meetings will be provided as needed, and remote participation will serve as attendance. "Adequate participation" is defined as either a) a minimum member attendance of 4 meetings per year, if only six meetings are held, or b) if more than six meetings are held in a particular year, a minimum of 75% of the meetings held.

Should a member experience a last -minute issue that prevents attendance, the member shall notify the Co-Chairs via telephone or email.

A Committee member or officer may be removed if the member is in violation of the attendance policy stated above.

Section VII: Voting

Each Continuum of Care shall have one vote. Committee actions shall require a majority vote from a quorum of the Steering Committee (5 of 8 CoCs). A quorum shall be defined as a simple majority of the CoCs, subject to the provision that at least one member (or Proxy) from each of the Continua be present. A minimum of five of the eight CoCs must be present for any vote to occur. Voting by simple majority shall prevail except as may be provided elsewhere in these by-laws. The HMIS Lead shall retain the right to settle any matters resulting in a tie vote.

Electronic Voting

Electronic voting is allowed, if vote responses represent a quorum of CoCs. A simple majority vote from 5 of 8 CoCs is required.

Proxy Voting

At times, situations (such as geographic constraints) may occur that make it difficult or impossible for a CoC to vote at some meetings.

The CoC who wishes to use a third party to vote for the respective CoC will issue the third party a written proxy statement. A copy of the written proxy statement shall be forwarded to the one of the co-chairs at least 24 hours in advance of the meeting date on which the proxy shall be placed in effect.

The proxy statement will provide the following information:

1. The name of the CoC issuing the proxy;
2. The party who will vote (a non-committee member can be designated); and
3. Whether the proxy is limited to the vote on a particular question or if the proxy is valid for all votes at a specific meeting.

A proxy statement shall only be valid for a specific meeting and the proxy statement will expire upon adjournment of that meeting. While a proxy allows a vote to be cast in the event of a CoC's absence, from an attendance perspective, the member(s) are considered absent when a proxy is used.

Section VIII: Resignation, Replacement, and Removal of members and officers

A Committee member or Chairperson may resign from the Steering Committee by:

1. Submitting a written notice to the Chairperson, or
2. A CoC may choose to replace their respective Steering Committee members at any time by submitting a written notice to the Chairperson.

A Committee member or officer may only be removed if a meeting is called specifically for this reason and only if the member:

1. Commits a violation of the Conflict of Interest Code as outlined in Section X;
2. Commits a violation of the Code of Conduct as outlined in Section XI; or
3. For just cause, as defined below.

If a member wishes to call a meeting for the purpose of removal of another member, they must first notify the Chairpersons, at which point, notice must be sent by one of the Chairpersons to both the Collaborative Applicant and Board of the potentially affected CoC, and all GA HMIS Steering Committee members, stating that the proposed removal is the purpose of the meeting and include the reasons for the proposed removal. The person recommended for removal and any additional representation desired by the affected CoC shall have the opportunity to speak on his or her behalf prior to a vote of the Steering Committee. The Steering Committee may deliberate without the person recommended for removal present, prior to a vote. A member or officer may only be removed from the Steering Committee by a 2/3 majority vote of the remaining Steering Committee members.

Just cause is defined as (but is not limited to):

1. Charged with a crime that would subject the member to debarment, suspension, disqualification or other exclusion from participating in a federally funded transaction pursuant to federal law.
2. Unprofessional behavior or acts of moral turpitude.
3. As defined by a 2/3 majority of the Steering Committee.

Section IX: Unanticipated Vacancies

Aside from vacancies due to lack of appointment, as described in Section IV of this document, unanticipated vacancies in a CoC position on the Steering Committee shall be filled, in writing, by the respective CoC.

Steering Committee members who are appointed due to an unanticipated vacancy will complete the remaining term of the committee member he or she was replacing.

Aside from a vacancy due to lack of appointment, as described in Section IV of this document, an unanticipated vacancy of the HMIS Lead representative shall be filled within thirty (30) days through appointment, in writing, by the chief official of the HMIS Lead. During this allotted time frame, the HMIS Lead forfeits its single vote.

Section X: Conflict of Interest

A Conflict of Interest Code shall govern the performance, behavior, and actions of the GA HMIS Steering Committee and its members.

1. No Committee Member shall participate in the selection, award, or administration of a bid or contract supported by Federal funds if a conflict of interest is real or apparent to the reasonable person.

2. Conflicts of interest may arise when any Committee Member has a financial, family, or any other beneficial interest in the vendor firm selected or considered for an award.
3. No Committee Member shall do business with, award contracts to, or show favoritism toward a member of his/her immediate family, spouse's family or to any company, vendor or concern who either employs or has any relationship to a family member; or award a contract or bid which violates the spirit or intent of Federal, State and local procurement laws and policies established to maximize free and open competition among qualified vendors.
4. Committee Members shall neither solicit nor accept gratuities, gifts, consulting fees, trips, favors or anything having a monetary value in excess of one hundred dollars (\$100) from a vendor, potential vendor, or from the family or employees of a vendor, potential vendor or bidder; or from any party to a sub-agreement or ancillary contract.
5. As permitted by law, rule, policy or regulation, the Steering Committee shall pursue appropriate legal, administrative or disciplinary action against a committee member, vendor or vendor's agent who is alleged to have committed, has been convicted of or pled no contest to a procurement related infraction. If said person has been convicted, disciplined, or pled no contest to a procurement violation, said person shall be removed from any further responsibility or activities on behalf of the Steering Committee.

Section XI: Code of Conduct

GA HMIS Steering Committee members are expected to conduct themselves with courtesy and respect, and the utmost civility and decorum.

At all times, the best interest of the GA HMIS Collaborative should influence the decisions made by the GA HMIS Steering Committee members. Personal relationships must not result in special considerations, including bias, nepotism, or favoritism that influences the performance of their official duties in a manner contrary to the interest of the GA HMIS Collaborative.

GA HMIS Steering Committee members are expected to exercise adequate control and supervision over matters for which they are individually responsible.

Section XII: CoC Withdrawal from the GA HMIS Collaborative

CoCs may withdraw from the GA HMIS Collaborative at any time by submitting written notice to the GA HMIS Steering Committee chairpersons; however, any CoC that does so will forfeit their access to both the HMIS Lead and the HMIS Implementation identified by the GA HMIS Collaborative. If a CoC fails to adopt these by-laws or amendments to these by-laws, such failure shall constitute a decision to withdraw from the GA HMIS Collaborative.

Section XIII: Exceptions to GA HMIS Steering Committee Authority

HMIS Lead changes

In the event that the HMIS Lead for the GA HMIS Collaborative must be changed, and this change is not initiated by the HMIS Lead, the GA HMIS Steering Committee must seek a 2/3 majority approval of the CoCs in the GA HMIS Collaborative to initiate the process. Additionally, the documented process by which the new HMIS Lead is selected, regardless of the reason a change was initiated, must also be approved by a 2/3 majority vote of the CoCs in the GA HMIS Collaborative.

HMIS Software changes

In the event that the HMIS Software must be changed, the GA HMIS Steering Committee must seek a 2/3 majority approval of the CoCs in the GA HMIS Collaborative to initiate the process. Additionally, the documented process by which the new HMIS Software is selected must also be approved by a 2/3 majority vote of the CoCs in the GA HMIS Collaborative.

Section XIV: By-Laws

Adoption

These by-laws shall be in effect upon approval by a 2/3 majority vote of the CoCs listed in Section I. Each CoC is responsible for determining the process by which they vote. Approval shall be by signatures which are documented and stored by the Chairpersons.

Annual Review

These by-laws shall be reviewed by the Governance and Policy Subcommittee not less than annually. Any proposed changes will be provided to the full GA HMIS Steering Committee membership for comments at least 21 calendar days in advance of the next regularly scheduled meeting, at which point the process outlined in Section XV will be followed if amendments are needed.

Section XV: Amendments

Recommendations to change or amend these by-laws may be made by any GA HMIS Steering Committee Member and shall be submitted at a regular meeting of the GA HMIS Steering Committee. Proposals shall stand for action and be open for discussion among members. If the proposal is accepted by a majority vote of the GA HMIS Steering Committee, the change(s) will be proposed to the Board of each CoC. Final changes must be voted on by each CoC, with each CoC voting by its established method. Each CoC will have 30 calendar days to submit their written vote to the HMIS Lead for record and tabulation.

If approved by a 2/3 majority of CoCs, the proposed change(s) will be accepted and the HMIS Lead shall update the document to reflect the changes and will distribute updated copies to all members before the next regular GA HMIS Steering Committee meeting.

Acknowledgement and Acceptance of GA HMIS Bylaws

The Continuum of Care, a member of the Georgia HMIS Collaborative, (CoC Name)

- Accepts and adopts these Bylaws for the GA HMIS Steering Committee.
- Appoints the following two people to be the CoC representatives on the GA HMIS Steering Committee.

CoC Representative 1

Name/Title Agency/Company

Relationship to CoC Contact email/phone number

CoC Representative 2

Name/Title Agency/Company

Relationship to CoC Contact email/phone number

Individual Authorized to enter into this Agreement

Printed Name Signature

Authorizing Role for the CoC Date



GA HMIS Policies and Standard Operating Procedures

This document details the policies, procedures, guidelines, and standards that govern the operations of the GA Homeless Management Information System (GA HMIS).

GA HMIS Policies and Standard Operating Procedures

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GA HMIS Policies and Standard Operating Procedures

Introduction

This document details the policies, procedures, guidelines, and standards that govern the operations of the GA Homeless Management Information System (GA HMIS). It outlines the roles and responsibilities of all agencies and persons with access to GA HMIS data, and it contains important and useful information about the ways in which GA HMIS data is secured and protected. All Providers using the GA HMIS should read this document in full and train every end user within its agency and programs to understand its contents as necessary. Appendix A is the End User Participation Agreement, which includes a statement that the user has read and understands these operating procedures as per the Agency Participation Agreement.

The US Department of Housing and Urban Development (HUD), other federal and state Partners, and the GA Collaborative, also known as Continuums of Care (CoCs), require GA HMIS to provide unduplicated statistical demographic reports on the numbers and characteristics of clients served as well as on program outcomes. In order to address the reporting requirements mandated by HUD, the Department of Community Affairs has implemented an electronic management information system that will provide the necessary demographic information and reports. This system is called the GA Homeless Management Information System (GA HMIS) and is administered by the GA Department of Community Affairs (DCA). All Providers funded by HUD, the federal partners, as well as some providers funded locally are required to participate in the GA HMIS, and some privately funded providers participate on a voluntary basis.

Providers participating in the GA HMIS are required to collect and record HUD required data elements for all new and continuing clients in the HMIS. Data entry should be completed within 48 hours for all projects including Emergency Shelters. All Providers using the GA HMIS are also required to comply with HUD's *HMIS Data and Technical Standards* available at www.hudhre.info and on the DCA website at <http://www.dca.state.ga.us/housing/specialneeds/programs/hmis.asp>.

Georgia recognizes the importance of maintaining confidential client records in a secure environment to ensure that the information is not misused or accessed by unauthorized people. The following Policies and Standard Operating Procedures (SOP) have been developed to establish standards for the collection, storage and dissemination of confidential information by the users of the GA HMIS. Georgia has developed a privacy policy regarding the use and disclosure of data in the GA HMIS and by programs operated directly by GA HMIS (see Appendix C for a copy of this policy).

The GA HMIS is an "open" system which allows for the sharing of client-level data electronically between collaborating agencies, which must adhere to the GA HMIS privacy policy as well as the policies and operating procedures in this document. Agencies may also be able to share information through other methods unrelated to the GA HMIS, as outlined in their specific program policies. Data shared outside of GA HMIS is not able to be controlled or monitored by GA; therefore this data is not covered by the GA

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HMIS privacy policy. DCA as the HMIS Lead and the GA HMIS System Administrators for the GA HMIS are the only entities with access to all client-level information, including personal identifiers, contained in the GA HMIS. Acceptable uses and disclosures of the data are outlined in the GA HMIS privacy policy. For example, DCA may disclose data that is required under a court order issued by a judge, to protect the health and safety of those being served in its programs, and may use de-identified data for research and analysis purposes. Except in rare cases, DCA does not provide access to client-level data containing personal identifiers to any non-Participating agency. Additionally, HUD does not require any client-level information from the GA HMIS for the programs it funds. Thus, only de-identified and/or aggregate-level data is shared with non-participating agencies and HUD.

GA HMIS Goals

The goals of the GA HMIS are to support and improve the delivery of homeless services in the jurisdictions it serves. Inclusive in these goals is the improvement of the knowledge base about homelessness that contributes to an enlightened and effective public response to homelessness. The GA HMIS is a tool that facilitates the following:

- *Improvements in service delivery* for clients as case managers assess the client's needs, inform the client about available services on site or through referral, help the client find and keep permanent housing, and improve service coordination when information is shared between programs within one agency that are serving the same client.
- *A confidential and secure environment* that protects the collection and use of all client data including personal identifiers.
- *The automatic generation of standard reports* required by HUD or other stakeholders and funders, including participation in the national Longitudinal System Analysis (LAS) formerly known as the Annual Homelessness Assessment Report (AHAR).
- *Generation of system-level data* and analysis of resources, service delivery needs and program outcomes for Georgia's homeless population.
- *A data collection and management* tool for authorized agencies to administer and supervise their programs.

GA recognizes the need to maintain each client's confidentiality, and will treat the personal data contained within the GA HMIS with respect and care. As the guardians entrusted with this personal data, GA has both an ethical and a legal obligation to ensure that data is collected, accessed and used appropriately. Of primary concern to GA are issues of security (i.e. encryption of data traveling over the Internet, the physical security of the GA HMIS servers), and the policies governing the release of this information to the public, government and funders. Meeting the needs of homeless persons served by GA HMIS and its Providers is the underlying and most basic reason for having the GA HMIS, and employing it for continued improvements in program quality.

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Incorporation and Modification of Other Documents

The GA HMIS End User Agreement, the GA HMIS Agency Participation Agreement, the GA HMIS Privacy Policy, the GA HMIS Client Consent and the GA HMIS Custom Development Policy are incorporated into this Agreement, restated in full, and are attached to this Agreement as Appendices A, B, C, D and E respectively. All five of these documents may be amended from time to time at the discretion of DCA and the GA HMIS Steering Committee, and all parties are bound by such amendments. Notice of any amendments will be done through DCA's current website at: <http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp>

Definitions

Agency Administrator: The person responsible for system administration at the agency level. This person is appointed by an Agency's Executive Director.

Authorized/Participating Agency: Any agency, organization or group who has a GA HMIS Participation Agreement and/or contract with DCA and that is allowed access to the GA HMIS ClientTrack application. These Agencies connect independently to the application via the Internet.

Client: shall mean any recipient requesting services by a Provider or any recipient of services offered by a Provider or Authorized/Participating Agency.

Client-level Data: Data collected or maintained about a specific person. This type of data can be de-identified for purposes of data analysis, which means that personally identifying information is removed from the record for reporting.

CoC HMIS Administrator: The designated individual(s) that provides local support to the respective CoC.

Database: An electronic system for organizing data so it can easily be searched and retrieved; usually organized by fields and records.

Encryption: Translation of data from plain text to a coded format. Only those with the "key" have the ability to correctly read the data. Encryption is used to protect data as it moves over the internet.

Firewall: A method of controlling access to a private network, to provide security of data. Firewalls can use software, hardware, or a combination of both to control access.

GA HMIS: The specific HMIS system utilized by the GA HMIS CoCs and other participating jurisdictions.

GA HMIS Lead Staff: The entity that provides oversight of GA HMIS.

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GA HMIS System Administrators: This person has the highest level of user access in GA HMIS and has full access to all user and administrative functions.

HMIS: Homeless Management Information System. This is a generic term for any system used to manage data about homelessness and housing.

HUD HMIS Data and Technical Standards: The initial HUD Data & Technical Standards were published July 30, 2004 Federal Register, Vol. 69, No. 146, pp. 45888 through 45934. The Department of Housing and Urban Development (HUD), the Department of Health and Human Services (HHS), and the Department of Veterans Affairs (VA) released the [2017 HMIS Data Standards](#) on May 2, 2017. The HMIS Data Standards provide communities with baseline data collection requirements developed by HUD, HHS, and VA.

Identifying Information: Information that is unique to an individual and that may be used to identify a specific person. Examples of identifying information are name and social security number.

Provider: Shall mean any organization within a CoC that provides outreach, shelter, housing, employment and/or social services to homeless people. For the purposes of this document, the term “provider” is synonymous with “Authorized Agency.”

Server: A computer on a network that manages resources for use by other computers in the network. For example, a file server stores files that other computers (with appropriate permissions) can access. One file server can “serve” many files to many client computers. A database server stores a data file and performs database queries for client computers.

User: An individual who has approved login credentials to access the GA HMIS *ClientTrack* software.

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Organization and Management of GA HMIS

Program Management

Policy: The Georgia Department of Community Affairs (DCA) is responsible for project management and coordination of the GA HMIS. DCA contracts with Eccovia who provides System Administration for the GA HMIS and is responsible for baseline training, system changes, reporting, custom reporting, addressing end user tickets and system change coordination. The GA HMIS Lead Staff is the primary contact for necessary or desired system-wide changes. In this role, the GA HMIS Lead Staff endeavors to provide a uniform GA HMIS that yields the most consistent data for client management, agency reporting, and service planning.

Procedure: All concerns relating to the policies and procedures of the HMIS should be addressed with the GA HMIS Lead Staff.

System Administration

Policy: DCA contracts with Eccovia who provides System Administration for the GA HMIS and is responsible for baseline training, system changes, reporting, custom reporting, addressing end user tickets and system coordination and administration. In the absence of the System Administrator, the backup staff member/proxy for responding to Authorized Agencies is a member of the DCA HMIS Lead team.

Procedure: The GA HMIS System Administrators administers the day-to-day operations of the GA HMIS and is governed by Georgia Bylaws Code of Conduct. Among other things, this Code of Conduct governs access to the Georgia data (client level or otherwise). All system-wide questions and issues should be directed to the GA HMIS System Administrators or the HMIS Lead, if the System Administrator is absent. DCA, the HMIS Lead and the GA HMIS Collaborative are ultimately responsible for all final decisions regarding planning and implementation of the GA HMIS.

CoC HMIS Administration: The CoC HMIS Administrator is selected by the respective CoC management. The CoC HMIS Administrator is responsible for providing support to the agencies within their respective CoC. This support may consist of troubleshooting, additional training, communicating policies and procedures, monitoring data quality, assisting with federal reporting requirements and working with the System Administrators and the HMIS Lead.

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Agency Administration

Policy: Each Authorized Agency must designate a staff member to be the GA HMIS Agency Administrator who is responsible on a day-to-day basis for enforcing the data and office security requirements under these Policies and Standard Operating Procedures. While one person per Authorized Agency may be designated as the Agency Administrator; a backup Administrator should be considered.

Procedure: The Executive Director of the Authorized Agency must identify an appropriate Agency Administrator and provide that person's name and contact information to the GA HMIS System Administrators and respective CoC HMIS Administrator. Changes to that information over time should be reported immediately to the GA HMIS System Administrators and the respective CoC HMIS Administrator. The GA HMIS Lead Staff is responsible for maintaining a current list of Agency Administrators.

Agency Administrators are responsible for the following:

- Serves as the primary contact between the Authorized Agency, GA HMIS System Administrator, the HMIS Lead and the CoC HMIS Administrator.
- Must have a valid email address and be an active, trained user.
- Communicates the need to remove end users from the GA HMIS immediately upon termination from agency, placement on disciplinary probation, or upon any change in duties not necessitating access to GA HMIS information. All changes must be relayed to the GA HMIS System Administrators or proxy.
- Must be technically proficient with web-based software since he/she will be responsible for maintaining the Authorized Agency's GA HMIS User list and contact information.
- Has access to all client data, user data, and agency administration information for the Authorized Agency; thus, is responsible for the quality and accuracy of this data.
- Ensures the stability of the agency connection to the Internet and *GA HMIS system ClientTrack* system, either directly or in communication with other technical professionals.
- Ensures Privacy Posting is posted and visible to all clients.
- Monitors and enforces compliance with standards of client confidentiality and ethical data collection, entry, and retrieval at the agency level.

User Access Levels

Policy: All GA HMIS Users will have a level of access to data that is appropriate to the duties of their position so that information is recorded and accessed on a "need to know" basis. All users should have the level of access that allows efficient job performance without compromising the security of the GA HMIS or the integrity of client information.

Procedure: Each CoC Representative (and/or its CoC HMIS Administrator) will identify the level of access each end user will have to the GA HMIS system ClientTrack database. Privilege levels are detailed below:

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- Manage Clients - The ability to create and edit client records and enroll clients in programs
- Manage Programs - The same privileges as “Manage clients” with the addition of the ability to edit relevant program profile information
- Manage Users - The same privileges as “Manage Programs” with the addition of the ability to manage user access and permission to programs
- Manage Agency - The same privileges as “Manage Users” with the addition of the ability to edit Agency information and create/ manage sites
- HMIS Lead – A “super user” privilege level used by the DCA HMIS Lead staff to allow “Manage Agency” access to multiple agencies (a service area).
- System Administrator - Full privileges to GA HMIS - GA HMIS System Administrators, Help Desk, and programmers only

GA Communication with Authorized Agencies

Policy: The GA HMIS Lead Staff is responsible for relevant and timely communication with CoC Representative, who is then in turn responsible to communicate to each agency regarding the GA HMIS. The GA HMIS Lead Staff will communicate system-wide changes and other relevant information to agencies as needed.

Procedure: General communications from the GA HMIS Lead Staff will be directed towards all users. Specific communications will be addressed to the person or people involved. The GA HMIS Lead Staff will be available via email, phone, and mail. The GA HMIS email list will also be used to distribute HMIS information. While specific problem resolution may take longer, the GA HMIS System Administrators will strive to respond to Authorized Agency questions and issues within 24 hours of receipt. CoC HMIS Administrators and Agency Administrators are responsible for distributing information to any additional people at their agency who may need to receive it, including, but not limited to, Executive Directors, client intake workers, and data entry staff. Agency Administrators are responsible for communication with all of their agency’s users.

System Availability

Policy: GA and GA HMIS will provide a highly available database server and will inform users in advance of any planned interruption in service.

Explanation: A highly available database affords agencies the opportunity to plan data entry, management, and reporting according to their own internal schedules. Availability is the key element in maintaining an HMIS that is a useful tool for Authorized Agencies to use in managing programs and services.

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Procedure: No computer system achieves 100% uptime. Downtime may be experienced for routine maintenance, in the event of a disaster, or due to systems failures beyond the control of GA HMIS System Administrators or the GA HMIS Lead Staff. In the event of disaster or routine planned server downtime, the GA HMIS Lead Staff will use Constant Contact to send correspondence that informs users of the cause and duration of the interruption in service. The HMIS ClientTrack system is backed up every four hours and the entire system is backed up daily so it can be restored as quickly as possible if necessary.

Inter-Agency Data Sharing

Policy: GA HMIS is an “open” system, meaning that data can be shared between all GA HMIS participating agencies. Whether data is actually shared or not is determined on a per client basis, based on user input and client data sharing preferences.

Explanation: The need for client confidentiality and the benefit of integrated case management needs to be balanced. In light of new regulations for Coordinated Entry and community needs, the privacy and security policies were designed to permit Inter-Agency data sharing while still safeguarding client confidentiality.

Procedure: When new clients are entered into GA HMIS, the initiating user must set the Client’s data sharing permission based on the Client’s response on the Consent to Share form, before data sharing is permitted. These permissions control the information that is shared about the client globally.

Users must record the actual responses received by the client when setting up the client’s electronic data sharing policy. Users may be monitored to ensure compliance with this policy at any time by Agency Administrators, the CoC HMIS Administrators, or the GA HMIS System Administrators, in which case users will need to provide a copy of the Consent to Share forms that are requested. Any user found to not adhere to the data sharing permissions allowed by the client will be required to go through the Privacy, Security and Confidentiality training. If violations continue, the user may be subject to being permanently banned from GA HMIS, and may face possible legal action. If a user feels it is in the best interest of the client, they may further restrict the client’s electronic sharing policy by setting sharing to Restrict to Org, but users may never choose to implement a less restrictive data sharing policy without collecting a new Release of Information form that has been signed by the client and permits less restrictive data sharing.

Ethical Data Use

Policy: Data contained in the GA HMIS will only be used to support or report on the delivery of homeless and housing services in Georgia. Each GA HMIS End User will affirm the principles of ethical data use and client confidentiality contained in the GA HMIS Policies and Standard Operating Procedures Manual, the GA HMIS Agency Participation Agreement, and the GA HMIS End User Agreement. Each Authorized

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Agency must have a written privacy policy, including specific policies related to employee misconduct or violation of client confidentiality. All GA HMIS End Users are expected to understand their Agency's privacy policy.

Procedure: All GA HMIS users will sign a GA HMIS System End User Agreement before being given access to the GA HMIS. Any individual or Authorized Agency misusing, or attempting to misuse GA HMIS data will be denied access to the database, and his/her relationship with the GA HMIS may be terminated. Any Authorized Agency for which the relationship with the GA HMIS is terminated may likely be de-funded by the Continuum of Care in which they are located because of the statutory requirement to participate in the Continuum's HMIS.

Access to Core Database

Policy: Only the GA HMIS System Administrators/GA HMIS Lead Staff will have direct access to the GA HMIS database through any means other than the GA HMIS user interface, unless explicitly given permission by GA HMIS System Administrators/GA HMIS Lead Staff.

Procedure: /GA HMIS Lead Staff will employ updated security methods to prevent unauthorized database access.

Client Rights and Confidentiality of Records

Policy: The GA HMIS System operates under a protocol of *inferred consent* to include client data in the GA HMIS. Each Authorized Agency is required to post a sign about their privacy policy in a place where clients may easily view it (i.e. - at the point of intake, on a clipboard for outreach providers, in a case management office). The privacy posting should include a statement about the uses and disclosures of client data as outlined in this document. Written authorization for inclusion of a client's data in GA HMIS is not required, but is inferred when a client accepts the services offered by the program.

Clients may opt out of GA HMIS or be unable to provide basic personal information. Clients have the right of refusal to provide personal identifying information to the GA HMIS. In these cases, it will be the responsibility of the CoC to provide alternative methods to capture the information outside of the HMIS system. Such refusal or inability by the client to produce the information shall not be a reason to deny eligibility or services to a client. When a client exercises his/her right of refusal, de-identified demographic (anonymous) information may be entered into the GA HMIS for federal reporting purposes.

Each Authorized Agency shall take appropriate steps to ensure that authorized users only gain access to confidential information on a "need-to-know" basis in accordance with this document and their own Privacy Policy. Duly authorized representatives of GA may inspect client records (including electronic records) at any time, although non-GA HMIS staff will not, as a matter of routine, be permitted to access

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protected private information. GA System Administrators, CoC HMIS Administrators, the HMIS Lead and Authorized Agencies will ensure the confidentiality of all client data as described in this document.

Explanation: The data in the GA HMIS is personal data, collected from people in a vulnerable situation. GA HMIS System Administrators, CoC HMIS Representatives, CoC Administrators, the HMIS Lead and Authorized Agencies are ethically and legally responsible to protect the confidentiality of this information. The GA HMIS will be a confidential and secure environment protecting the collection and use of client data.

Procedure: Access to client data will be controlled using restrictive access policies. Each Authorized Agency must develop and make available a privacy policy related to client data captured in GA HMIS and through other means. A posting that summarizes the privacy policy must be placed in an area easily viewed by clients, and must also be placed on the Authorized Agency's web site (if they have one). Only individuals authorized to view or edit individual client data in accordance with the stated privacy policies and these Standard Operating Procedures will have access to that data.

Authorized Agency Grievances

Policy: Authorized Agencies will contact the GA HMIS System Administrators to resolve GA HMIS problems including but not limited to operation or policy issues. If an issue needs to be escalated, the GA HMIS System Administrators may contact GA HMIS Lead Staff for further guidance. The GA HMIS Lead Staff and the CoC HMIS Steering Committee will have final decision-making authority over all grievances that arise pertaining to the use, administration, and operation of the GA HMIS.

Procedure: Users at Authorized Agencies will bring GA HMIS problems or concerns to the attention of their Agency Administrator. If problems, concerns, or grievances cannot be addressed by the Agency Administrator, the Agency Administrator will contact their respective CoC HMIS Representative, who may ask for these issues to be stated in writing. If the grievance requires further attention, the GA HMIS Lead Staff may consult with Georgia's legal counsel. The Georgia HMIS Lead along with the GA HMIS Steering Committee shall have final decision-making authority in all matters regarding the GA HMIS.

Client Grievances

Policy: Clients must contact the Authorized Agency with which they have a grievance for resolving of GA HMIS problems. Authorized Agencies will report all GA HMIS related client grievances to the respective CoC Representatives, who in turn, will report these grievances to the GA HMIS Lead Staff. If the Authorized Agency's grievance process has been followed without resolution, the Authorized Agency may escalate the grievance to the respective GA CoC Representative as outlined in the "Authorized Agency Grievances" section.

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Procedure: Each Authorized Agency is responsible for answering questions, complaints, and issues from their own clients regarding the GA HMIS. Authorized Agencies will provide a copy of their privacy policy and/or copies of the GA HMIS Privacy Policy or GA HMIS Policies and Standard Operating Procedures upon client request. Client complaints should be handled in accordance with the Authorized Agency's internal grievance procedure, and then escalated to the appropriate CoC Representative in writing if no resolution is reached. The GA HMIS Lead Staff is responsible for the overall use of the GA HMIS, and will respond if users or Authorized Agencies fail to follow the terms of the GA HMIS agency agreements, breach client confidentiality, or misuse client data. Authorized Agencies are obligated to report all GA HMIS related client problems and complaints to their CoC Representative, who will determine the need for further action. Resulting actions might include further investigation of incidents, clarification or review of policies, or sanctioning of users and Agencies if users or Agencies are found to have violated standards set forth in GA HMIS Agency Agreements or the Policies and Standard Operating Procedures Manual. If a client request that their data is no longer shared, the user will have the client sign an updated Client Consent to Share - Revocation form that will be retained in the clients file and change their sharing restrictions to Restrict to Org in the HMIS system.

Authorized Agency Hardware/Software Requirements

Policy: Authorized Agencies will provide their own computers and method of connecting to the Internet, and thus to the GA HMIS ClientTrack system. If possible and as funds permit, GA HMIS Lead Staff or the respective CoC may choose to assist Authorized Agencies in obtaining computers and Internet access for the GA HMIS.

Procedure: Contact your local CoC Representative for the current status or assistance.

Hardware/Software Requirements: GA HMIS is web-enabled software; all that is required to use the database is a computer, a valid username and password, and the ability to connect to the Internet using internet browser software (Chrome, Internet Explorer, Firefox, etc.). There is no unusual hardware or additional GA HMIS-related software or software installation required. The following workstation specifications are recommended.

Minimum Workstation Requirements

- Computer: PC 500 MHz or better
- Web Browser: Google Chrome 4.0.249 or higher, Microsoft Internet Explorer 5 or higher, Mozilla Firefox 3.0 or higher, or Netscape Navigator 6.0 or higher
- Hard Drive: 2 GB
- 64 MB RAM
- Internet Connectivity (broadband or high-speed)
- SVGA monitor with 800 x 600+ resolutions
- Keyboard and Mouse

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Recommended Workstation Requirements

- Computer: 1 Gigahertz Pentium Processor PC
- Browser: Google Chrome 17.0.963 or higher, Microsoft Internet Explorer 8.0 or higher (preferred)
- 20 GB Hard Drive
- 512 MB RAM
- Broadband Internet Connection - 128 Kbps (hosted version) or LAN connection
- SVGA monitor with 800x600 + resolution
- Keyboard and mouse

Although there is no unusual hardware or additional GA HMIS related software required to connect to the database, the speed and quality of the Internet connection and the speed of the hardware could have a profound effect on the ease of data entry and report extraction. A high-speed Internet connection, like a DSL or ISDN line with speeds at or above 128.8 Kbps, is preferred, as is a computer with speeds above 166MHz. Google Chrome 17.0.963 or higher is the recommended platform to eliminate certain technical problems.

Authorized Agency Technical Support Assistance

Policy: GA HMIS System Administrators and the GA HMIS Lead Staff will provide technical assistance including a help desk, training, and ongoing software support for users of the GA HMIS. Technical issues with the GA HMIS software should be addressed by submitting a ticket while logged into the ClientTrack system or submit an email at GAHMISsupport@dca.ga.gov. Internal hardware and internet connectivity issues should be addressed by the Authorized Agency's internal IT staff to the extent possible.

Procedure: Hardware and connectivity issues not related to the GA HMIS software are not under the control of the GA HMIS Lead Staff or GA HMIS System Administrators and should be addressed by the Authorized Agency's internal IT staff. Authorized Agencies may send an email to GAHMISsupport@dca.ga.gov for technical support to learn what is necessary to connect to the GA HMIS ClientTrack system as well as to request assistance with the application itself.

Videos, Guides, Etc.

Policy: The GA System Administrators and the GA HMIS Lead Staff will provide an array of materials to assist all GA HMIS End Users on use and functionality of the system. Each GA HMIS End User will be required to view several videos and complete an assessment prior to obtaining system access. These videos, documentation, forms, etc. will be posted in the GA HMIS webpage <http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp>.

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Explanation: A variety of training methods and materials target various learning styles to provide software users with information about how the software product is used. Videos and reference guides will provide specific technical instruction to GA HMIS End Users about how to use GA HMIS ClientTrack.

Procedure: The GA HMIS System Administrators and GA HMIS Lead Staff will create, distribute and update the necessary videos, reference guides, etc. These will include procedures that are held in common for all Authorized Agencies.

Monitoring and Evaluation

Policy: The GA HMIS Lead Staff and participating CoCs will regularly monitor and evaluate the effectiveness of the GA HMIS Implementation and, based on the information received, will continue to make enhancements to the GA HMIS system and the Policies and Standard Operating Procedures as necessary.

Explanation: Monitoring and evaluation helps ensure security and proper usage of the GA HMIS system.

Procedure: The GA HMIS System Administrators will conduct internal system monitoring. This information will be shared with the CoCs and may be used by the CoC to monitor programs funded through the CoC as required by HUD. The HMIS Lead is authorized to conduct monitoring on behalf of the GA HMIS System Administrators and/or their CoC.

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Security and Access

User Access

Policy: Only the GA HMIS System Administrators or the GA HMIS Lead Staff will be authorized to grant user access to GA HMIS. User accounts will be unique for each user and may not be exchanged or shared with other users.

Explanation: Unique user names and passwords are the most basic building block of data security. Not only is each user name assigned a specific access level, but in order to provide to clients or program management an accurate record of who has altered a client record, when it was altered, and what the changes were (called an “audit trail”) it is necessary to log a user name with every change. Exchanging or sharing user names seriously compromises the security of the GA HMIS system, and *will be considered a breach of the system user agreement* and will trigger appropriate repercussions and/or sanctions for the user and agency.

Procedure: Users are not able to access any data until they are trained, all agreements are collected, and the account is activated by GA HMIS staff. The GA System Administrator and GA HMIS Lead Staff will have access to the list of active end user names. Additionally, Agency Administrators will monitor the users in their agency to ensure that accounts are current.

User Changes

Policy: The Authorized Agency Administrator will notify the System Administrator and GA HMIS Lead Staff of needed changes to the Authorized Agency user accounts. This includes revoking authorization for staff who are no longer with the agency and any needed changes to the users’ agency access and privilege levels, etc.

Procedure: The Agency Administrator is required to inform the System Administrator through the ticketing system within the ClientTrack application of the need to revoke the user account of a terminated employee immediately upon termination of employment. For employees with user access otherwise leaving the agency, the user account should be revoked at the close of business on the person’s last day of employment.

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Passwords

Policy: GA End Users will have access to the GA HMIS ClientTrack system via a user name and password. Passwords must be changed a minimum of once every 90 days. Users will keep passwords confidential. Under no circumstances shall a user share a password nor shall they post their password in an unsecured location; to do so *will be considered a breach of the system user agreement* and will trigger appropriate repercussions and/or sanctions for both the user and agency.

Procedure: Upon sign in with the user name and temporary password, the user will be required by the software to select a unique password that will be known only to him/her. Every 90 days, end users will be prompted to change their password. See Section entitled “User Access” for additional detail on Password security.

Password Recovery

Policy: The GA HMIS System Administrators and GA HMIS Lead Staff DO NOT have access to User account passwords.

Procedure: In the event of a lost or forgotten password, the end user will use the password recovery option to reset their password. The system will ask the user for their email address, and then ask for the answer to their security question. As an extra layer of security, End Users may not choose where the password reset email is sent. Once the security question is answered correctly, an email will be sent only to the email address listed in the End User’s account profile. If this account is no longer active, the End User must request assistance from the System Administrator or HMIS Lead to reactivate their account. This request must be sent to the GAHMISsupport@dca.ga.gov address. Once users receive the Password reset email which contains a temporary Password, Users must login and change their password immediately before gaining access to Agency and Client data. Each request for a new password is logged in an audit trail.

Extracted Data

Policy: GA HMIS end users will maintain the security of any client data extracted from the database and stored locally, including all data used in custom reporting. GA HMIS users will not electronically transmit any unencrypted client data across a public network. Any custom reports (electronic or printed) which are shared with non-Participating agency, must remove Client and Household names.

Procedure: Data extracted from the database and stored locally will be stored in a secure location (not on floppy disks/CDs or other temporary storage mechanisms like flash drives or on unprotected laptop computers, for example) and will not be transmitted outside of the private local area network unless it is

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properly protected via encryption or by adding a file-level Password. The GA HMIS System Administrators will provide help in determining the appropriate handling of electronic files. All security questions will be addressed to the GA HMIS System Administrators via the internal ticketing system. Breach of this security policy will be considered a violation of the user agreement, which may result in personnel action and/or agency sanctions.

Data Access Computer Requirements

Policy: Users will ensure the confidentiality of client data, following all security policies in the GA HMIS Policies and Standard Operating Procedures Manual and adhering to the standards of ethical data use, regardless of the location of the connecting computer. All Policies and Procedures and security standards will be enforced regardless of the location of the connecting computer. The participating CoC may restrict access to the GA HMIS system to specific computers in the future.

Explanation: Because GA HMIS is web-enabled, software end users could conceivably connect to the database from locations other than the Authorized Agency itself, using computers other than agency-owned computers. Connecting from a non-agency location may introduce additional threats to data security, such as the ability for non-GA HMIS users to view client data on the computer screen or the introduction of a virus. If such a connection is made, the highest levels of security must be applied, and client confidentiality must still be maintained. This includes only accessing the GA HMIS via a computer that has virus protection software installed and updated.

Procedure: Each Authorized Agency and Agency Administrator is responsible for:

- a) Physical space: Authorized Agencies must take reasonable steps to ensure client confidentiality when authorized users are accessing the GA HMIS system. Authorized end users are required to conduct data entry in a protected physical space to prevent unauthorized access to the computer monitor while confidential client information is accessible.
- b) Use of a non-agency computer located in a public space (i.e. internet café, public library) to connect to HMIS is discouraged.
- c) Time-Out Routines: Time-out (login/logout) routines on every computer to shut down access to the GA HMIS ClientTrack system when a computer is unattended. Time-out routines will be engaged at a minimum after 10 minutes of inactivity or at other intervals as GA HMIS Steering Committee determines.
- d) Each computer that accesses GA HMIS ClientTrack system must have current virus software that updates automatically installed.
- e) If the GA HMIS ClientTrack system is accessed over a network, the network must be protected by a hardware or software firewall at the server. A stand-alone machine that accesses the GA HMIS client data must also have a hardware or software firewall installed and active. This may be the firewall protection included as part of the operating system or the virus protection software installed on the computer.

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Questions about security of the GA HMIS should be referred to the GA HMIS System Administrators via the internal ticketing system.

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Agency Participation Requirements

GA HMIS Agency Participation Agreements

Policy: Only Authorized Agencies will be granted access to the GA HMIS ClientTrack system. The GA CoCs shall make the sole determination to identify Authorized Agencies that will participate in their Continuum of Care. The Executive Director of each Authorized Agency will be required to sign a “GA HMIS Agency Participation Agreement” (Appendix B) binding their organization to the GA HMIS Policies and Standard Operating Procedures and all applicable Federal, State, and local laws and regulations regarding the handling of client data before access is granted.

Procedure: Authorized Agencies will be given a copy of the GA HMIS Agency Participation Agreement, the Policies and Standard Operating Procedures Manual, and any other relevant GA HMIS paperwork prior to any end user for the agency accessing the ClientTrack system. The Executive Director should review and then sign the paperwork and return to the GA HMIS Lead Staff. The Agency account must be setup first prior to activating an end user account under that agency.

User Accounts

Policy: In order to activate an account, an end user review and sign the GA HMIS End User Agreement and send to the GA HMIS Lead Staff. Additionally, Agency end users will be trained to use GA HMIS ClientTrack system by completing the initial end user video playlist or by the System Administrator at a training sessions scheduled by the GA HMIS System Administrators or GA HMIS Lead Staff. Once training has been completed, the end user will complete the associated training assessment and then will activate each user’s account.

Sharing of accounts, User IDs, or Passwords is strictly prohibited. Users may not even share accounts, User IDs, or Passwords with management within their agency.

Procedure: Each Agency Administrator (or Executive Director) will identify the authorized users for the agency. These authorized user names should be submitted to the GA HMIS System Administrators via the internal ticket system of the need to set up new authorized end user accounts.

GA HMIS System User Agreements

Policy: Each Authorized Agency User will sign a GA HMIS Collaborative System User Agreement before being granted access to the GA HMIS.

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Explanation: Before being granted access to the GA HMIS, each user must sign a GA HMIS End User Agreement, stating that he/she will abide by the GA HMIS Policies and Standard Operating Procedures Manual, will appropriately maintain the confidentiality of client data, and will only collect, enter, and retrieve data in the GA HMIS relevant to the delivery of services to people in housing crisis.

Procedure: The GA HMIS Lead Staff will distribute GA HMIS System End User Agreements to new GA HMIS Users for signature. The user will sign the GA HMIS System End User Agreement and the agreement will be faxed, mailed or emailed/scanned to the GA HMIS Lead Staff. The GA HMIS Lead Staff will also file the signed GA HMIS System End User Agreements for all users. The existence of a signed GA HMIS End User Agreement for each active user will be verified in any on-site reviews or may be checked during regular monitoring of contracts. Allowing a user access to the GA HMIS system without a signed user agreement is a violation of the GA HMIS Policies and Standard Operating Procedures and may result in sanctions.

Training

Policy: The GA HMIS System Administrators and GA HMIS Lead Staff are responsible for defining training needs and organizing training sessions for Authorized Agencies. Various training options will be provided, to the extent possible, based on the needs of GA HMIS end users. GA HMIS ClientTrack training materials will be provided on <http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp> that may be used by Agency Administrators, CoC Representatives and CoC Admins to provide extra training opportunities.

Explanation: In order for the GA HMIS to be a benefit to clients, a tool for Authorized Agencies and a guide for planners, all users must be adequately trained to collect, enter, and extract data.

Procedure: The GA HMIS System Administrators and GA HMIS Lead Staff will provide access to training for all GA HMIS users. The GA HMIS System Administrators and GA HMIS Lead Staff will provide support to Agency Administrators, CoC Representatives and CoC Admins, who will in turn provide for end user training above and beyond the initial training.

Contract Termination Initiated by Authorized Agency

Policy: Authorized Agencies that are not required to use the GA HMIS may terminate the GA HMIS Agency Participation Agreement with or without cause upon 30 days written notice to GA HMIS and according to the terms specified in the GA HMIS Agency Participation Agreement. In the event of termination of the GA HMIS Agency Participation Agreement, all data entered into the GA HMIS will remain an active part of the GA HMIS system.

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Explanation: While Authorized Agencies who are not required to use the GA HMIS may terminate the GA HMIS Agency Participation Agreement, the data entered prior to that termination would remain part of the database. This is necessary for the database to provide accurate information over time and information that can be used to guide planning for community services in GA. The termination of the GA HMIS Agency Participation Agreement may affect other contractual relationships with DCA, HUD, or other funders.

Procedure: For Authorized Agencies that are not required to use the GA HMIS and that are terminating the GA HMIS Agency Participation Agreement, the person responsible for signing the GA HMIS Agency Participation Agreement (or a person in the same position within the agency) will notify the GA HMIS System Administrators 30 days or more prior to the date of termination. In all cases of termination of GA HMIS Agency Participation Agreement, the GA HMIS System Administrators will disable all user accounts from that Authorized Agency on the date of termination of agreement.

Contract Termination Initiated by GA

Policy: DCA may terminate the GA HMIS Agency Participation Agreement for non-compliance with the terms of the agreement or with the GA HMIS Policies and Standard Operating Procedures with written notice to the Authorized Agency. DCA may also terminate the GA HMIS Agency Participation Agreement with or without cause with 30 days written notice to the Authorized Agency and according to the terms specified in the GA HMIS Agency Participation Agreement. If a GA HMIS contract is terminated under the terms of that contract, the GA HMIS Agency Participation Agreement(s) for GA HMIS access for that/those Agency (ies) will also be terminated. In that case, access may be renegotiated by DCA and the agency if appropriate and in accordance with these standard operating procedures. The termination of the GA HMIS Agency Participation Agreement or contract with DCA may affect other contractual relationships with GA, HUD, or other funders. In the event of termination of the GA HMIS Agency Participation Agreement or GA HMIS contract, all data entered into the GA HMIS will remain a part of the GA HMIS. If termination of the GA HMIS Agency Participation Agreement occurs, all Authorized Agency end user accounts will be disabled on the date the GA HMIS Agency Participation Agreement is terminated.

Explanation: While DCA may terminate the GA HMIS Agency Participation Agreement with the Authorized Agency, the data entered by that Authorized Agency prior to termination of the agreement would remain part of the database. This is necessary for the database to provide accurate information over time and information that can be used to guide planning for community services in GA. The termination of the GA HMIS Agency Participation Agreement may affect other contractual relationships with GA, HUD, or other funders.

Procedure: Any GA HMIS Authorized Agency regardless of their funding can be terminated if they demonstrate willful neglect or disregard of the Standard Operating Procedures. If the agreement with an authorized agency or collaborative of authorized agencies is terminated, that/those Agency (ies) will be terminated from GA HMIS. For Authorized Agencies that are not required to use the HMIS system and

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which the GA HMIS Agency Participation Agreement is terminated, the GA HMIS System Administrators will notify the CoC Representative 30 days or more from the date of termination. The CoC will notify the Provider Agency. In all cases of termination of the GA HMIS Agency Participation Agreement, the GA HMIS System Administrators will disable all user accounts from that Provider Agency on the date of termination of agreement.

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Data Collection, Quality Assurance and Reporting

Required Data Collection

Policy: Authorized Agencies funded by HUD (as either a recipient or subrecipient) are required to participate in HMIS by HUD. Other providers contracted by other State or Federal departments may also be required to participate in the GA HMIS. All Authorized Agencies that participate in HMIS are considered “Covered Homeless Organizations” (CHO) and are required to comply with HUD’s *HMIS Data and Technical Standards* unless those standards are in conflict with local laws. This includes the collection of required data elements.

Authorized Agencies shall collect and enter all HUD required data elements on every client served by the Provider upon intake into the Provider’s facility or program. Authorized Agencies may choose to collect more client information for their own case management and planning purposes or to comply with requirements from their CoC or funders.

Timeliness of Data Entry: Providers are required to enter basic client intake data into the GA HMIS within 48 hours of a client being served which includes their entry or exit from their Program.

Procedure: Each agency should review and enter all HUD required data into GA HMIS as specified by HUD per Program Type.

Client Consent

Policy: Each agency must post a sign at each intake or comparable location and on its web site (if applicable) explaining the reasons for data collection for those seeking services. Consent for entering of data into GA HMIS may be inferred when the proper privacy notice is posted and if the client accepts the services offered. If a client chooses to not share their data through GA HMIS, all of the client’s data may still be collected and stored in GA HMIS, but data sharing must be disabled for that client’s record (i.e. “locked”).

Explanation: Privacy Policies should be in effect for each agency to both inform clients about the uses and disclosures of their personal data and to protect the agency by establishing standard practices for the use and disclosure of data. Each client must give permission for the disclosure and/or use of any client data outside of the privacy policy developed and posted by the agency. Client consent notices must contain enough detail so that the client may make an informed decision. Clients may withdraw permission to have their personal protected information in the HMIS, or may make a request to see copies of his or her client record.

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Procedure: Authorized Agencies will develop a privacy posting, which will be posted in appropriate areas for client review.

Client Consent Forms for Data Sharing

Policy: GA HMIS participating/authorized agencies must use the GA HMIS Client Consent to Share form to collect all clients' sharing consent (Appendix F). Each agency should include in its privacy policy that data collected by the agency is disclosed to the DCA HMIS Lead as part of its administrative responsibility for the GA HMIS and that the data may be used for analysis and reporting purposes. DCA HMIS Lead will only report aggregate and/or de-identified data as part of its responsibilities, and agrees to maintain the data with the highest level of confidentiality and within the security guidelines set forth in this document.

Procedure: Each client must have a signed GA HMIS Client Consent to Share form on file which records their permission (or lack thereof) before users can share their data via GA HMIS.

Appropriate Data Collection

Policy: GA HMIS end users will only collect client data relevant to the delivery of services to people in housing crises as required by HUD and/or required by funders or by law.

Explanation: The purpose of the GA HMIS is to support the delivery of homeless and housing services in Georgia. The database should not be used to collect or track information not related to serving people in housing crises or otherwise required for policy development, planning, or intake purposes.

Procedure: Agency Administrators will ask the GA HMIS System Administrators for any necessary clarification of appropriate data collection. The GA HMIS System Administrators, in consultation with GA HMIS Steering Committee, will make decisions about the appropriateness of data being entered into the database. The GA HMIS Lead Staff may periodically audit an agency's data collection practices to ensure the database is being used appropriately.

Ownership

Policy: The GA HMIS, including any and all data stored in the GA HMIS, is the property of the DCA. DCA has authority over the creation, maintenance, and security of the GA HMIS. Violations of the GA HMIS Agency Participation Agreement, the Standard Operating Procedures, and Privacy Policies may be subject to discipline and/or termination of access to the GA HMIS.

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Procedure: The GA HMIS Agency Participation Agreement includes terms regarding the maintenance of the confidentiality of client information, an acknowledgement of receipt of the Policies and Standard Operating Procedures Manual, and an agreement to abide by all policies and procedures related to the GA HMIS including all security provisions contained therein. Because programs participating in the GA HMIS are funded through different streams with different requirements, DCA shall maintain ownership of the database in its entirety in order that these funders cannot access data to which they are not legally entitled.

Data Entry - Client Profile Sharing Level

Policy: Users will accurately record the real time data sharing level(s) indicated by the client. Repeated violation of this policy may lead to personnel action and or action against the Authorized Agency, including but not limited to immediate termination of user and/or agency access.

Procedure: Client information will not ever be shared unless the user expressly sets up a data sharing policy in the client's profile. It is imperative that, once a data sharing policy is set up for a client, users at an Authorized Agency keep this information current, modifying a current policy record or creating a new policy record as necessary, in accordance with changes to the client's GA HMIS Client Consent to Share form.

Additional Customization

Policy: Authorized Agencies may request additional desired customization (such as special reports) directly from the respective CoC Representative. Agency or CoC level customizations will be considered by the GA HMIS Steering Committee on a case-by-case basis. Appendix E covers the GA HMIS Custom Development Policy if the customization requires development.

Explanation: It is the responsibility of individual Agencies to determine the best way to use GA HMIS for internal data collection, tracking, and reporting. This may include purchasing additional customization.

Procedure: Authorized Agencies will contact their CoC Representative in order to discuss additional customization needs.

GA HMIS Policies and Standard Operating Procedures

Data Integrity

Policy: GA HMIS users will be responsible for the accuracy of their data entry. Authorized Agency leadership will be responsible for ensuring that data entry by users is being conducted in a timely manner and will also ensure the accuracy of the data entered. Data may also be used to measure program efficacy, which impacts funding opportunities during competitive funding processes such as the annual Continuum of Care application to HUD or annual ESG applications.

Procedure: It is the responsibility of each Authorized Agency and the respective CoC to monitor the quality and accuracy of its GA HMIS data. However, the GA HMIS Lead Staff may periodically audit data integrity. In order to test the integrity of the data contained in the GA HMIS, the GA HMIS System Administrators will perform periodic data integrity checks on the GA HMIS. The data integrity checks will include reporting of “overlaps,” possible verification of data and comparison to hard files, as well as querying for internal data consistency and null values. Any patterns of error will be reported to the GA HMIS Lead Staff and the GA HMIS Steering Committee. When patterns of error have been discovered, users will be required to make corrections where possible, correct data entry techniques, and improve the accuracy of their data entry.

Quality Control: Data Integrity Expectations

Policy: Accurate and consistent data entry is essential to ensuring the usefulness of the GA HMIS. Authorized Agencies will provide acceptable levels of timeliness and accuracy. Authorized Agencies without acceptable levels of data quality may incur sanctions as instituted by the respective CoC until the problems are addressed.

Procedure: The Continuum of Care will perform data integrity checks on its respective GA HMIS authorized agencies.

On-Site Review

Policy: The DCA Lead may perform reviews of an Authorized Agency’s procedures related to the GA HMIS as part of monitoring. Additional monitoring may take place by funding bodies or CoCs.

Procedure: Reviews enable the GA HMISs Lead and the CoCs to monitor compliance with the Policies and Standard Operating Procedures Manual and GA HMIS Agency Participation Agreements. The exact procedures for on-site reviews will be determined in advance of the actual on-site review.

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Client Data Retrieval

Policy: Any client may request to view, or obtain a printed copy of, his or her own records contained in the GA HMIS. This information should be made available to clients within a reasonable time frame of the request. No client shall have access to another client's records in the GA HMIS.

Procedure: A client may ask to see his or her own record. The Agency Administrator, will verify the client's identity and print all requested information. The client may request changes to the record. The agency can follow applicable laws regarding whether to change information based on the client's request. A log of all such requests and their outcomes should be kept on file in the client's record.

Public Data Retrieval

Policy: The GA HMIS Lead Staff will address all requests for data from entities other than Authorized Agencies or clients. No individual client data will be provided to any group or individual that is neither the Authorized Agency that entered the data or the client him or herself without proper authorization or consent.

Procedure: All requests for data from anyone other than an Authorized Agency or a client must be directed solely to GA HMIS Lead Staff. GA may also issue periodic public reports about homelessness and housing issues in the areas covered by GA HMIS. No individually identifiable client data will be reported in any of these documents.

Data Retrieval Support/Reporting

Policy: Authorized CoC HMIS Administrators will create and run CoC- level and agency-level reports.

Explanation: Authorized CoC HMIS Administrators and the System Administrators have the ability to create and execute reports on CoC –wide and agency-wide data, depending on their privilege level. This allows Authorized CoC HMIS Administrators to support CoC-level and agency-level goals.

Procedure: The CoC HMIS Administrators will be trained in the use of reporting tools by the System Administrator. The System Administrator will provide query functionality and templates for reports specifically for GA HMIS. The System Administrator may assist with the development of or running of reports/queries.

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DATA SHARING & SECURITY

- Clients are uniquely identified by a database-managed identity field.
- GA HMIS maintains the following:
 - a. User permissions are assigned by role and by Agency/Site
 - b. Users are logged out of the system after a configurable period of inactivity (20 minutes)
 - c. Passwords must be changed periodically (90 days)
 - d. Inactive end users must contact the System Administrator to re-activate the end user account.
- GA HMIS uses HTTPS/SSL Standards for data transmission.
- Passwords must be updated every 90 days, and cannot be reused.

DISASTER RECOVERY

- Disaster recovery for the GA HMIS application is managed by Eccovia.
- A full back up of the Database is performed nightly. Incremental and Transactional backups are done periodically during the day. All back up files are moved off site.

GA HMIS Policies and Standard Operating Procedures

Appendix A: GA HMIS End User Participation Agreement

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Appendix A: GA HMIS End User Participation Agreement

Agency Name (Please Print): _____

User Name (Please Print): _____

In this End User Participation Agreement, “Agency” refers to the agency named above. Agency recognizes the privacy of client needs in the design and management of the Georgia HMIS (“GA HMIS”). These include both the need to continually improve the quality of homeless and housing services with the goal of eliminating homelessness in our community, and the need to vigilantly maintain client confidentiality, treating the personal data of our most vulnerable populations with respect and care.

GA HMIS End Users (“Users”) have a moral and a legal obligation to ensure that the data is being collected, stored, accessed and used appropriately. It is also the responsibility of each User to ensure that client data is only used for the purposes for which it was collected. Proper user training; compliance with the terms and conditions as stated in the User Agreement, and the GA HMIS Privacy Policy.

Relevant points regarding client confidentiality include:

- A client consent form must be signed by each client whose data is shared with a GA HMIS participating agency via the GA HMIS system. Users may not share client data with other GA HMIS participating agencies via the GA HMIS system without obtaining this written permission from the client.
- Client consent may be revoked by that client at any time by completing the GA HMIS Client Consent to Share Revocation Form at any GA HMIS participating agency.
- No client may be denied services for failure to provide consent for GA HMIS data sharing or collection.
- With the exception of case notes, Clients have a right to inspect, receive a copy of, and request changes to their GA HMIS records.
- Users will maintain GA HMIS data in such a way as to protect the identity of clients from further participating agencies, individuals or entities.
- Any User failing to protect client confidentiality as set forth in this User Agreement and the GA HMIS Privacy Policy, may be denied access to the GA HMIS.

I have received and read a copy of the GA HMIS End User Participation Agreement, the GA HMIS Privacy Policy, and the GA HMIS Policies and Procedures Manual and affirm the following:

1. I have received GA HMIS Privacy Policy.
2. I have read and will abide by the terms of the GA HMIS User Agreement, the GA HMIS Privacy Policy and the GA HMIS Policies and Procedures Manual.
3. I will maintain the confidentiality of client data in the GA HMIS as outlined above and as outlined in the User Agreement, the GA HMIS Privacy Policy, and the GA HMIS Policies and Procedures Manual.
4. I will only collect, enter, and extract data in the GA HMIS relevant to the delivery of services to homeless, at risk of becoming homeless, and formerly homeless people experiencing a crisis in our community.

User Signature

Date

GA HMIS Policies and Standard Operating Procedures

Appendix B: GA HMIS Agency Participation Agreement

GA HMIS Policies and Standard Operating Procedures

Appendix B: GA HMIS Agency Participation Agreement

_____ (“Agency”) has elected to participate in the Homeless Management Information System (“HMIS”). The HMIS software is licensed by the Georgia Housing Finance Authority, who has designated it to be solely administered by the Georgia Department of Community Affairs (“DCA”). Agency is entering into this HMIS Participation Agreement for Agencies (“Agreement”). The HMIS is a database that collects and maintains information on the characteristics and service needs of clients. The system collects and stores client-level data, which can be used to generate unduplicated and aggregate reports to determine the use and effectiveness of the services being provided to the homeless population.

In consideration of their mutual undertakings and covenants, the Agency and DCA agree as follows:

1. General Understandings:

- A. Definitions. In this Agreement, the following terms will have the following meanings:
- i. “Agency” (sometimes called “Participating Agency”) refers to any service provider or organization signing this document that is participating or planning to participate in the HMIS.
 - ii. “Agency staff” refers to employees, volunteers, contractors, or any other agents of the Agency.
 - iii. “Client” refers to a person receiving services from the Agency.
 - iv. “DCA” refers to the Georgia Department of Community Affairs.
 - v. “De-Identifying Information” (also referred to as “non-identifying” information) refers to data that has specific Client demographic information removed, to allow use of the data without identifying a specific Client.
 - vi. “End User” refers to Agency employees, volunteers, contractors, or any other agents of the Agency authorized to have, and having, access to the HMIS.
 - vii. “Enter(ing)” or “entry” refers to the entry of any Client information into the HMIS.
 - viii. “GA HMIS Privacy Policy” is a document related to the processing of protected personal client information by end users of the GA HMIS.

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- ix. “GA HMIS End User Agreement/Code of Ethics is a document outlining the agreement between the End User and DCA.
- x. “GHFA” refers to the Georgia Housing Finance Authority.
- xi. “HMIS” refers to the Homeless Management Information System.
- xii. “HMIS staff” refers to the employees, contractors, or agents of DCA assigned to administer the HMIS, as well as to analyze, review and report on the data contained in HMIS.
- xiii. “GA HMIS Policies and Procedures” is a document referring to the day to day policies and procedures to be followed.
- xiv. “Identifying Information” (also referred to as confidential data or confidential information) refers to information about a Client that can be used to distinguish or trace the Client’s identity, either alone or when combined with other personal or identifying information using methods reasonably likely to be used.
- xv. “Information” refers to both De-Identifying Information and Identifying Information.
- xvi. “Share(ing),” or “information share(ing)” refers to entering information into HMIS, or providing Identifying Information to other agencies, organizations, individuals, or providers that participate in the HMIS.

B. Use and Disclosure. Whenever Agency enters information into HMIS, such Identifying Information will be available to the HMIS staff who may use it to: administer HMIS, conduct analysis, coordinate services, and prepare reports to be submitted to others in a de-identifying form. Identifying Information entered into the GA HMIS may also be viewed by other agencies that participate in the HMIS who are serving that client with appropriate authorization, have executed a GA HMIS End User Agreement and have agreed to be bound by the GA HMIS Privacy Policy (“Privacy Policy”) and GA HMIS Policies and Procedures (“HMIS Policies”). Agency may use and disclose HMIS Identifying Information only in accordance with the above documents.

C. Incorporation and Modification of Other Documents. The GA HMIS End User Agreement, the GA HMIS Agency Agreement, GA HMIS Privacy Policy, the GA HMIS Client Consent and the GA HMIS Custom Development Policy are incorporated into this Agreement, restated in full, and are attached to this

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Agreement as Appendices A, B, C, D and E respectively. All five of these documents may be amended from time to time at the discretion of DCA, and all parties are bound by such amendments. Notice of any amendments will be done through DCA's website at:

<http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp>

D. Access. Agency agrees to allow DCA and its subcontractors access to information provided by the Agency in accordance with this Agreement and to carry out its duties with respect to the HMIS, which includes without limitation, HMIS administration, testing, problem identification and resolution, management of the HMIS database, and data aggregation and analysis activities, as permitted by applicable state and federal laws and regulations.

2. Confidentiality:

A. Agency shall not:

- i. enter information into the HMIS which it is not authorized to enter, or
- ii. share information that Agency is not authorized to share.

By entering information into the HMIS, Agency represents that it has the authority to enter such information into the HMIS. To the best of Agency's knowledge, any information entered into the HMIS does not violate any of the Client's rights, under any relevant federal, state, or local confidentiality laws, regulations or other restrictions applicable to Client information.

If Agency is subject to any laws or requirements which restrict Agency's ability either to disclose or enter certain data elements into HMIS, Agency will ensure that any entry it makes in the HMIS or disclosure of any data elements complies with all applicable laws or other restrictions. Agency is solely responsible for determining if any disclosures of Client information are restricted under any state or federal laws and regulations including but not limited to the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and the Federal Drug and Alcohol Confidentiality Regulations, 42 CFR Part 2 ("Confidentiality Regulations").

B. To the extent that information entered by Agency into the HMIS is or becomes subject to disclosure restrictions, Agency will immediately inform DCA in writing of such restrictions and submit by mail to the address given herein for written notices.

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3. Display of Notice:

Pursuant to the notice published by the Department of Housing and Urban Development (“HUD”) on July 30, 2004, Agency will prominently display at each intake desk (or comparable location) the Privacy Policy provided by DCA, that explains generally the reasons for collecting Identifying Information in the HMIS and the Client rights associated with providing Agency staff with Identifying Information. It is Agency’s responsibility to ensure that each Client understands his or her rights. Additionally, if Agency maintains a public webpage, the current version of the Privacy Policy must be posted on the webpage. The current form of Privacy Policy, which may be modified from time to time at DCA’s discretion, is attached to and incorporated into this Agreement by reference, and is available from DCA or on its website, <http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp>

4. Information Collection, Release and Sharing Consent:

A. Collection of Identifying Information. Agency must collect information by lawful and fair means, and with the knowledge or consent of the Client.

Any Identifying Information collected by the Agency must be relevant to the purpose for which it is to be used. To the extent necessary for those purposes, Identifying Information should be accurate, complete and timely.

B. Sharing. Prior to sharing any of a Client’s information with an agency or organization, except as provided in the Privacy Policy, Agency will provide the Client with a copy of its GA HMIS Consent to Share Form (“Consent”). Following an explanation regarding the entity or individual that the information will be shared with and how it will be used, the Agency will obtain the informed consent of the Client by having the Client sign the Consent Form.

If a Client does not sign the Consent form, information may not be shared with other agencies except as may be allowed in the Privacy Policy. Agency shall keep all copies of the signed Consent form for a period of seven (7) years after the Client last received services at or from the Agency. Such forms shall be available for inspection and copying by DCA and/or the U.S. Department of Housing and Urban Development, at any time.

C. Refusal of Services. Agency may not refuse or decline services to a Client or potential Client if that person:

- i. objects to the entry of its information in the HMIS; or

GA HMIS Policies and Standard Operating Procedures

- ii. refuses to share his or her personal information with the Agency or cannot remember certain information; however, some information may be required by the program to determine eligibility for housing or services, to assess needed services, or to fulfill reporting requirements.

5. HMIS Policies and Procedures:

Notwithstanding any other provision of this Agreement, Agency's use of and participation in the HMIS, and the use, disclosure, and submission of data to and from the HMIS shall, at all times, be governed by the Privacy Policy and the HMIS Policies, as may be revised from time to time. The Privacy Policy shall control any disagreements between the referenced documents.

6. Disclosure to Third Parties:

Agency shall not release any Identifying Information received from the HMIS to any other person or organization without the written informed Consent of the Client, unless such disclosure is required by law or in accordance with the Privacy Policy.

7. Client Inspection/Correction:

Upon receipt of a written request from a Client, Agency shall allow the Client to inspect and obtain a copy of his or her own information during regular business hours. Agency is not required to provide a Client access to information (a) compiled in reasonable anticipation of, or for use in, a civil, criminal or administrative action or proceeding; (b) about another individual; (c) obtained under a promise of confidentiality if disclosure would reveal the source of the information; and (d) which, if disclosed, would be reasonably likely to endanger the life or physical safety of any individual. Agency must allow a Client to correct information that is inaccurate or incomplete; provided, however, that prior to correcting such information, Agency shall consult with DCA. Such consultation is necessary to ensure proper coordination between the Agency's response and the capabilities of the HMIS system, unless the requested correction is a routine correction of a common data element for which a field exists in HMIS (e.g., date of birth, prior residence, social security number, etc.). Agency is not required to remove any information as a result of a correction, but may, in the alternative, mark information as inaccurate or incomplete and may supplement it with additional information.

8. Security:

Agency shall maintain the security and confidentiality of information in the HMIS and is responsible for the actions of its employees, contractors, volunteers, or agents and their proper training and supervision. Agency agrees to follow the HMIS Policies. At its discretion, DCA may conduct periodic

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assessments of Agency to monitor its compliance. The steps Agency must take to maintain security and confidentiality include, but are not limited to:

A. Access. Agency will permit password-protected access to the HMIS only to authorized Agency staff who need information from the HMIS for legitimate business purposes (such as to provide services to the Client, to conduct evaluation or research, to administer the program, or to comply with regulatory requirements). Agency will limit the access of such staff to only those records that are immediately relevant to their work assignments.

B. End User Code of Ethics. Prior to permitting any End User to access HMIS, Agency will require the End User to sign an End User Code of Ethics. Agency will comply with and enforce the End User Code of Ethics and will inform DCA immediately in writing of any breaches of the End User Code of Ethics.

- i. any staff, volunteer or other person who has been granted an End User ID and password and is found to have committed a breach of system security and/or Client confidentiality will have his/her access to the database revoked immediately.
- ii. in the event of a breach of system security or Client confidentiality, the Director of the Agency or designee shall notify DCA in writing immediately, but in no event later than twenty-four (24) hours. This correspondence should be sent to address given herein for notice. Any Agency that is found to have had breaches of system security and/or Client confidentiality shall enter a period of probation, during which technical assistance shall be provided to help the Agency prevent further breaches.

Probation shall remain in effect until DCA has evaluated the Agency's security and confidentiality measures and found them compliant with the policies stated in this Agreement and the End User Code of Ethics. Subsequent violations of system security may result in suspension from the HMIS.

C. Computers: Security for data maintained in the HMIS depends on a secure computing environment. Computer security is adapted from relevant provisions of the Department of Housing and Urban Development's ("HUD") "Homeless Management Information Systems (HMIS); Data and Technical Standards Proposed Rule" (Docket No. FR 5475-P-01- Fed. Reg. Vol. 76, No. 237 (December 9, 2011/Proposed Rules). Agencies are encouraged to directly consult that document for complete documentation of HUD's standards relating to HMIS, and hereby agree to incorporate any changes to HUD policy into their computing environment on the timeline specified by HUD. Agency will allow access to the HMIS only from computers which are:

- i. protected from viruses by commercially available virus protection software (a) that includes, at a minimum, automated scanning of files as they are accessed by End Users

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- on the system on which the HMIS application is accessed and (b) with virus definitions that are regularly updated from the software vendor;
- ii. protected with a secure software or hardware firewall between, at least, the workstation and any systems (including the internet and other computer networks) located outside of the Agency;
 - iii. maintained to ensure that the computer operating system running the computer used for the HMIS is kept up to date in terms of security and other operating system patches, updates, and fixes;
 - iv. accessed through web browsers with 128-bit encryption (e.g., Internet Explorer, and Google Chrome). Some browsers have the capacity to remember passwords, so that the End User does not need to type in the password when returning to password-protected sites. This default shall not be used with respect to the HMIS; the End User is expected to physically enter the password each time he or she logs on to the system; and
 - v. staffed at all times when in public areas. When computers 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. These steps should minimally include (a) logging off the HMIS system, (b) physically locking the computer in a secure area, (c) shutting down the computer entirely, or (d) using a password protected screen saver.

D. End User Authentication: Agency will permit access to HMIS only with use of an End User authentication system consisting of an End User name and a password which the End User may not share with others. Written information pertaining to End User access (e.g., End User name and password) shall not be stored or displayed in any publicly accessible location. Passwords shall be between eight and twelve characters long and include both letters and numbers. Passwords shall not be, (or include) the End User name, the HMIS vendor's name, the HMIS name, the Agency's name, or consist entirely of any word found in the common dictionary or any of the forenamed words spelled backwards. The use of default passwords on initial entry into the HMIS application is allowed so long as the End User changes the default password on first use. Individual End Users must not be able to log on to more than one workstation at a time, or be able to log on to the network at more than one location at a time. Passwords and End User names shall be consistent with guidelines issued from time to time by HUD and DCA. Passwords and End User names shall not be exchanged electronically without DCA's approval.

E. Hard Copies: The Agency must secure any paper or other hard copy containing Identifying Information that is generated either by or for the HMIS, including, but not limited to reports, data entry forms and signed consent forms. Any paper or other hard copy generated by or for the HMIS that

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contains such information must be supervised at all times when it is in a public area. If Agency staff is not present, the information must be secured in areas that are not publicly accessible. Agencies wishing to dispose of hard copies containing Identifying Information must do so by shredding the documents or by other equivalent means with written approval by DCA. Written information specifically pertaining to End User access (e.g., End User name and password) must not be stored or displayed in any publicly accessible location.

F. Training/Assistance: Agency will ensure End Users have received the required GA HMIS Privacy, Security and Confidentiality Training and the End User Onboarding Training prior to accessing the HMIS system. Agency will participate in such training as is provided from time to time by DCA. Representatives of DCA will be reasonably available during DCA's defined weekday business hours for technical assistance (e.g., troubleshooting and report generation).

9. Information Entry Standards:

A. Information entered into HMIS by Agency will be truthful, accurate, complete and timely to the best of the Agency's knowledge.

B. Agency will not solicit from Clients or enter information about Clients into the HMIS database unless the information is required for a legitimate business purpose such as to provide services to the Client, to conduct evaluation or research, to administer the program, or to comply with regulatory requirements.

C. Agency will only enter information into the HMIS database with respect to individuals which it serves or intends to serve, including through referral.

D. Agency will enter information into the HMIS database within seven (7) days of data collection.

E. Agency will not alter or over-write information entered by another Agency.

DCA reserves the right to, in its sole discretion, delete or segregate information entered into the HMIS by an Agency, or take any other appropriate measures, to maintain the accuracy and integrity of the HMIS or to avoid compromising the HMIS' goal of maintaining unduplicated counts of Clients.

10. Use of the HMIS:

A. Agency will not access Identifying Information for any individual for whom services are neither being sought nor provided by the Agency.

B. Agency may report non-identifying information to other entities for funding or planning purposes. Such non-identifying information shall not directly identify individual Clients.

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C. Agency and DCA will report only non-identifying information in response to requests for information from the HMIS, including but not limited to requests for information related to research

D. Agency will not use the HMIS in violation of any federal or state law, including, but not limited to, copyright, trademark and trade secret laws, and laws prohibiting the transmission of material which is threatening, harassing, or obscene. Software licensing was purchased from ClientTrack, Inc. (“Supplier”) to implement the HMIS. Without limiting the foregoing covenant, Agency agrees that the data and information related to the software licensed by Supplier, and related documentation and support services, may be confidential and proprietary information (“Confidential Information”) of the Supplier and agrees to use such Confidential Information only in connection with Agency’s authorized use of the HMIS and support services and further agrees not to disclose such Confidential Information to any third party, other than as required by law. Furthermore, Agency acknowledges and agrees that the Supplier will retain all right, title, interest and ownership in and to the HMIS software, including any customization or modification thereof, and Agency will not copy any documentation related to the HMIS software other than for internal business purposes, nor shall Agency disassemble, decompose or reverse engineer the HMIS software, except as otherwise provided herein, use the HMIS software on behalf or for the benefit of any other person or entity or otherwise infringe upon any of the Supplier’s trademarks, trade secrets, copyrights, patents or other intellectual property rights. Agency shall include all Supplier copyright and other proprietary notices on any copy of the documentation related to HMIS software reproduced, used, or made available by Agency.

E. Agency will not use the HMIS to defraud federal, state or local governments, individuals or entities, or conduct any illegal activity.

F. Agency shall not use the HMIS to aggregate data to compare the performance of other participating Agencies, without the express written consent of DCA and each of the Participating Agencies being compared.

G. Notwithstanding any other Section of this Agreement, the parties may use or disclose for any lawful purpose information that: (a) is in the possession of the party prior to the time of the disclosure to the party through the HMIS and was not acquired, directly or indirectly, from the HMIS; or (b) is made available to the party by a third party who has the legal right to do so.

11. Proprietary Rights of the HMIS:

A. Agency or HMIS Staff shall assign passwords and access codes for all Agency Staff that meet other privacy, training and conditions contained within this Agreement.

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B. Agency or HMIS Staff shall not assign passwords or access codes to any other person not directly connected to or working for the Agency.

C. Agency shall be solely responsible for all acts and omissions of its End Users, and all other individuals who access the HMIS either through the Agency or by use of any password, identifier or log-on received or obtained, directly or indirectly, lawfully or unlawfully, from the Agency or any of the Agency's Authorized End Users, with respect to the HMIS and/or any confidential and/or other information accessed in connection therewith, and all such acts and omissions shall be deemed to be the acts and omissions of the Agency. Each Agency shall certify:

- i. that its End Users have received training regarding the confidentiality of HMIS information under all applicable federal, state, and local laws and agree to protect the Information in compliance with such laws and this Agreement;
- ii. that its End Users shall only access the HMIS for purposes approved by the Agency and that are consistent with this Agreement;
- iii. that its End Users have agreed to hold any passwords, or other means for accessing the HMIS, in a confidential manner and to release them to no other individual or entity. Agency shall ensure that all End Users understand that sharing passwords and other means for accessing the HMIS is expressly prohibited;
- iv. that its End Users agree and understand that their failure to comply with the terms of this Agreement may result in their exclusion from the HMIS and may constitute cause for disciplinary action by the Agency; and
- v. that it has restricted access to the HMIS only to the End Users that the Agency has identified pursuant to this Section.

D. Agency shall inform the CoC Administrator or System Administrator at DCA via email to terminate the rights of an End User immediately upon the End User's termination or resignation from his or her position. The Agency is responsible for following up to verify that the End User is removed from the system. It shall be the responsibility of the Agency to routinely ensure that End Usernames and passwords are current and to immediately notify HMIS staff in the event that End Usernames and passwords are not current.

E. Agency shall be diligent not to cause in any manner or way, corruption of the HMIS, and Agency agrees to be responsible for any damage it may cause.

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12. Data Collection & Evaluation Committee:

DCA will consult with the Data Collection & Evaluation Committee under the Georgia HMIS By-Laws from time to time regarding issues such as revision to the form of this Agreement. Written Agency complaints that are not resolved may be forwarded to the Data Collection & Evaluation Committee under the GA HMIS By-Laws, which will try to reach a voluntary resolution of the complaint. Unresolved issues would then go to the Steering Committee for resolution.

13. Limitation of Liability and Indemnification:

Note: Under sections 13 and 14, the term DCA includes both GHFA and DCA. It is the intention of the parties that all limitations of liability and indemnification agreed to apply to DCA also apply to GHFA. Parties acknowledge that this is an essential provision of this Agreement.

A. Except as provided in Section 13, no party to this Agreement shall assume any additional liability of any kind due to its execution of this Agreement or its participation in the HMIS system. It is the intent of the parties that each party shall remain liable, to the extent provided by law, regarding its own acts and omissions; but that no party shall assume additional liability on its own behalf or liability for the acts of any other person or entity through participation in HMIS except for the acts and omissions of its own employees, volunteers, agents or contractors unless any such liability is expressly created herein. The parties specifically agree that this Agreement is for the benefit of the parties only and creates no rights in any third party.

B. IT IS EXPRESSLY AGREED THAT IN NO EVENT SHALL DCA BE LIABLE TO AGENCY FOR ANY SPECIAL, DIRECT, INDIRECT, CONSEQUENTIAL, EXEMPLARY, OR OTHER DAMAGES, INCLUDING BUT NOT LIMITED TO LOSS OR PROFITS OR REVENUES, LOSS OF USE, LOSS OF INFORMATION/DATA, OR OTHER DAMAGES NOT SPECIFIED HEREIN. This is agreed whether a claim for any such liability or damages is premised upon breach of contract, breach of warranty, negligence, strict liability, equitable theory, tort, or any other theories of liability, even if DCA has been apprised of the possibility or likelihood of such damages occurring. Parties acknowledge that this is an essential provision of this Agreement, with adequate consideration made.

C. Agency agrees to indemnify, defend and hold harmless DCA including its directors, officers, employees, representatives, and agents from and against any and all claims and liabilities (including, without limitation, all damages, costs, and expenses, including legal fees and disbursements paid or incurred) arising from the intentional acts or omissions, negligence, or strict liability of Agency, its directors, officers, employees, representatives, or agents, or Agency's breach of this Agreement. This Section shall survive the termination of this Agreement.

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D. Without limiting any other provision of this Agreement, Agency and its End Users shall be solely responsible for all decisions and actions taken or not taken involving services, treatment, patient care, utilization management, and quality management for their respective Clients resulting from or in any way related to the use of the HMIS or the Information made available thereby. Agency and End Users shall have no recourse against, and hereby waive, any claims against DCA for any loss, damage, claim or costs relating to or resulting from its own use or misuse of the HMIS.

E. HMIS uses available technology to match Client identities with their records in the HMIS to provide Agencies with information regarding Clients. Because Client information is maintained in multiple places and because not all information is kept in a standard fashion, it is possible that false matches may occur or that there may be errors or omissions in the information provided to Agency. To that end, it is incumbent upon the Agency and its End Users to verify the Client's information before the information is relied upon in providing services to a Client. Neither DCA nor the HMIS in general independently verifies or reviews the information transmitted through the HMIS for accuracy or completeness. Further, neither DCA nor the HMIS make any representations or promises regarding the continued participation of any particular Agency in the HMIS. Agencies may be added to or deleted from the HMIS at any time and such changes may be beyond the control of DCA or the HMIS and may occur without prior notice to Agency.

F. Agency acknowledges and agrees that the HMIS is an information management tool only and that it contemplates and requires the involvement of Agencies and End Users that are qualified to maintain, collect and enter information into the HMIS. Agency further acknowledges and agrees that DCA has not represented its services as having the ability to perform any tasks that constitute the practice of medicine or of other professional or academic disciplines. DCA shall not be responsible for any errors, misstatements, inaccuracies, or omissions regarding the content of the HMIS, although every effort has been made to ensure its quality and accuracy. Agency assumes all risk for selection and use of the content in the HMIS.

G. All data to which access is made through the HMIS originates from Agencies, and not from DCA. All such data is subject to change arising from numerous factors, including without limitation, changes to Client information made at the request of the Client, changes in the Client's condition, the passage of time and other factors. DCA neither initiates the transmission of any data nor monitors the specific content of data being transmitted. Without limiting any other provision of this Agreement, DCA shall have no responsibility for or liability related to the accuracy, content, currency, completeness, content or delivery of any data either provided by Agency, or used by Agency, pursuant to this Agreement.

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H. Access to the HMIS and the information obtained by Agency pursuant to the use of those services are provided “as is” and “as available.” Agency is solely responsible for any and all acts or omissions taken or made in reliance on the HMIS or the information in the HMIS, including inaccurate or incomplete information.

I. DCA shall not be liable for any cessation, delay or interruption of services, nor for any malfunction of hardware, software or equipment for whatever reason.

14. Disclaimer of Warranties:

DCA makes no warranties, express or implied, including warranties of merchantability or fitness for a particular purpose, to any Agency or any other person or entity as to the services of the HMIS or as to any other matter.

15. Notice

All notices under this Agreement to DCA will be made as follows. This Notice address may be modified in writing.

Georgia Department of Community Affairs
60 Executive Park South, NE
Atlanta, GA 30329
ATTN: Jeanette Pollock

Notices to the Agency under this Agreement will be made according to the Authorized Officer at the mailing address specified in the signature block of this Agreement. This Notice address may be modified in writing.

16. Prohibition of Unauthorized Customization

For customization of any features of HMIS that may be desired by an Agency, Agency will first contact their local Continuum of Care, who will forward any such request directly to DCA for approval. DCA has the absolute right to approve or disapprove of any requested modification at its’ sole discretion. Such requests will not be unreasonably withheld. Agency understands that it may be liable for the complete cost of any such approved customization.

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17. Survival

The following provisions shall survive any termination of this Agreement: Sections 1, 2, 4B, 5, 6, 7, 8E, 9, 10, 11c, 11e, 13, 14, 15, 17. It is the intention of the parties that termination does not relieve any party of any obligations detailed in the Agreement generally up until the point the Agreement is terminated.

18. Term

This agreement will continue until terminated by either party pursuant to the provisions contained herein.

19. Additional Terms and Conditions

A. Agency will abide by such guidelines as are promulgated by HUD and DCA from time to time regarding administration of the HMIS.

B. Agency and DCA intend to abide by applicable State and Federal laws. Should any term of this Agreement be inconsistent with applicable law, or should additional terms be required by applicable law, Agency and DCA agree to modify the terms of this Agreement so as to comply with applicable law.

C. Neither DCA nor Agency will transfer or assign any rights or obligations regarding the HMIS without the written consent of the other party.

D. This Agreement will be in force until terminated by either party. Either party may terminate this Agreement with thirty (30) days written notice, for any reason. Either party may also terminate this Agreement immediately upon a material breach of this Agreement by the other party, including but not limited to a breach of the HMIS Policies or Privacy Policy by Agency. Upon termination of this Agreement, Agency shall remain liable for (and nothing in this Agreement shall prevent DCA from recovering) any fees, costs, or expenses that have been incurred prior to the termination of this Agreement.

DCA and the remaining Participating Agencies will maintain their rights to use all of the information previously entered by Agency except to the extent a restriction is imposed by the Client or applicable law.

E. Copies of Agency data will be provided to the Agency upon termination of this Agreement at the Agency's written request to DCA made within sixty (60) days after the termination of this Agreement. Information will be provided on hard drive or other mutually agreed upon media. Unless otherwise specified in writing, copies of data will be delivered to Agency within sixty (60) calendar days of receipt

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of written requests for data copies. DCA reserves the right to charge Agency DCA's actual costs for providing such data to Agency.

F. Except as otherwise provided, no action taken by either party, or its officers, employees or agents, pursuant to this Agreement, shall be deemed to constitute an action of the other party, or shall be construed to place the parties in a relationship of partners, joint ventures, principal and agent, or employer and employee, or shall be deemed to confer upon either party any express or implied power, right or authority to enter into any agreement or commitment, express or implied, or to incur any obligation or liability on behalf of the other party except as expressly provided herein. DCA and Agency intend and agree that they and their respective agents or employees shall serve as independent contractors and not as employees of the other party, and this Agreement shall not be considered a hiring by either party or a contract of employment.

G. During the term of this Agreement, Agency shall not (without the written consent of DCA) directly or indirectly, hire, employ or attempt to hire or employ any person who is an employee of DCA, or who was within the preceding twelve (12) month period an employee of DCA, or in any way solicit, induce, bring about, influence, promote, facilitate, encourage, cause or assist or attempt to cause or assist any current employee of DCA to leave his or her employment with DCA.

H. This Agreement may be amended or modified, and any of the terms, covenants, representations, warranties or conditions of this Agreement may be waived, only by a written instrument executed by the Parties, or in the case of a waiver, by the party waiving compliance.

I. Any waiver by any party of any condition, or of the breach of any provision, term, covenant, representation or warranty contained in this Agreement, in any one or more instances, shall not be deemed to be or construed as a further or continuing waiver of any such condition or breach of any other condition or the breach of any other provision, term, covenant, representation, or warranty of this Agreement.

J. Neither party shall assign its rights or delegate its duties hereunder without the prior written consent of the other, which consent will not be unreasonably withheld. All of the terms, provisions, covenants, conditions and obligations of this Agreement shall be binding on and inure to the benefit of the successors and assigns of the parties hereto.

K. Any notice required or permitted to be given under this Agreement shall be conclusively deemed to have been received by a party Three days after mailing, or upon actual signature date for registered/certified mail.

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L. This Agreement sets forth the entire understanding between the parties with respect to the matters contemplated by this Agreement and supersedes and replaces all prior and contemporaneous agreements and understandings, oral or written, with regard to these matters.

M. If any provision of this Agreement is determined to be invalid or unenforceable, such invalidity or unenforceability shall not affect the validity or enforceability of any other provisions of this Agreement that can be given effect without the invalid or unenforceable provisions, and all unaffected provisions of this Agreement shall remain in full force and effect as if this Agreement had been executed without such invalid or unenforceable provisions.

N. The Parties affirm that this Agreement has been entered into in the State of Georgia and will be governed by and construed in accordance with the laws of the State of Georgia, notwithstanding any state's choice of law rules to the contrary. Any action to enforce, challenge or construe the terms or making of this Agreement or to recover for its breach shall be litigated exclusively in a state court located in the State of Georgia, DeKalb County, or in Federal Court in the Northern District of Georgia.

O. Headings used in this Agreement are for the convenience of the parties, and shall not be used to assist in the interpretation of the Agreement.

P. This Agreement may be executed in two or more counterparts, each of which will be deemed an original, but all of which together shall constitute one and the same instrument.

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In Witness Whereof, Agency and DCA have, through their duly authorized representatives, entered into this Agreement. The parties, having read and understood the foregoing terms of this Agreement, do by their respective signatures dated below hereby agree to the terms thereof.

Agency Name: _____

Name of Authorized Officer: _____

Signature of Authorized Officer: _____

Date: _____

Title of Authorized Officer: _____

Agency Street Address: _____

Mailing Address for notice (if different): _____

Telephone: _____ Facsimile: _____

Email: _____

DCA

Name of Authorized Officer: _____

Signature of Authorized Officer: _____

Date: _____

Title of Authorized Officer: _____

Department of Community Affairs
60 Executive Park South, NE
Atlanta, Georgia 30329

GA HMIS Policies and Standard Operating Procedures

Appendix C: GA HMIS Privacy Policy

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Appendix C: GA HMIS Privacy Policy

This notice describes the privacy policy of the Georgia Homeless Management Information System (“GA HMIS”). GA HMIS is administered by the HMIS Lead Agency, the Georgia Department of Community Affairs (“DCA”), operating on behalf of the Georgia Housing and Finance Authority (GHFA). DCA administers GA HMIS on behalf of the regional homeless services planning bodies (individually referred to as “Continuum of Care” or “CoC” and collectively referred to as “The Collaborative” or “CoCs”) in Georgia that participate in the statewide GA HMIS implementation. DCA may amend this GA HMIS Privacy Policy at any time, and will maintain a record of any changes made, as well as post new versions on the GA HMIS website located at <http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp>.

This notice applies to the personal information of individuals whose personal data is collected or maintained in hard copy or in electronic formats in the GA HMIS.

In relation to this personal information, users entering data in the GA HMIS:

- Collect personal client information only when appropriate or required by entities providing funding for homeless services (“the Funder or Funders”);
- May use or disclose information in order to facilitate service delivery;
- May also use or disclose information to comply with legal requirements or other obligations as described in the notice;
- Will not disclose personal information without written consent unless specifically stated within the notice; and
- Assume that, unless stated otherwise, persons applying for or receiving services from one of the GA HMIS Participating Agencies agree to allow users of the GA HMIS to collect, use, or disclose information as described in this notice.

Each person providing personal information may:

- Inspect his/her personal information that is maintained in the GA HMIS, with the exception of case notes;
- Ask the agency entering data for the GA HMIS to correct inaccurate or incomplete information within the record;
- Ask about the GA HMIS’ privacy policy or practices;
- File a grievance regarding GA HMIS’ privacy policies and practices. DCA will respond to questions and complaints;
- Request a copy of this full notice for more details.

A. What this notice covers

1. This notice describes the privacy policy and practices of the GA HMIS, administered by DCA, which is the lead agency for the GA HMIS. DCA’s main office is located at 60 Executive Park South,

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Atlanta, GA 30329. DCA's phone number for purposes of GA HMIS is (404) 679-4840. Information about GA HMIS is on DCA's web site which is located at:

<http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp>.

2. The policy and practices in this notice cover the processing of protected personal client information by users of the GA HMIS within The Collaborative. This notice covers all personal information policies set forth by DCA in its role as a program administrator for CoC programs and in its role as the administrator of the GA HMIS. GA HMIS Participating Agencies may have additional privacy policies on information entered and accessed by users.
3. Protected Personal information (PPI) is any information GA HMIS maintains about a client that:
 - Allows identification of an individual directly or indirectly; **and**
 - Can be manipulated by a reasonably foreseeable method to identify a specific individual; **Or**
 - Can be linked with other available information to identify a specific client.

When this notice refers to personal information, it means PPI.

4. DCA and each CoC in The Collaborative have adopted this policy in accordance with the Homeless Management Information Systems Data and Technical Standards and subsequent HMIS notices issued by the U.S. Department of Housing and Urban Development (HUD) and their federal partners through the U.S. Interagency Council on Homelessness (USICH). DCA's policies and practices are consistent with those standards and with industry standard best practices. DCA's policies are also consistent with requirements outlined in other applicable state and local laws.
5. This notice informs clients, staff, contractors, GA HMIS Participating Agency users, Funders and others how personal information is processed by the GA HMIS Collaborative.
6. DCA may amend this notice and change the policy or practices at any time. Amendments may affect personal information that DCA or the GA HMIS Participating Agencies obtained before the effective date of the amendment. Any changes to this privacy policy will be posted as a notice at <http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp>.
7. DCA and/or GA HMIS Participating Agencies will provide a written copy of this notice to any individual or organization that requests one. DCA also maintains a copy of this notice on its website located at <http://www.dca.ga.gov/housing/specialneeds/programs/hmis.asp>.

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B. How and Why We Collect Personal Information

1. DCA (including DCA's contractors), CoC Administrator Agencies (an agency other than DCA, duly authorized in writing by a respective CoC, to have an employee(s) with access to the client-level data of that specific CoC for purposes of system administration activities), and the GA HMIS Participating Agencies may collect and/or maintain personal information for some or all the following purposes:
 - To provide or coordinate services to clients;
 - To locate other programs that may be able to assist clients;
 - For functions related to payment or reimbursement from others for services provided by DCA or DCA's contractors;
 - To carry out administrative functions, including legal, audit, personnel, oversight, contract monitoring, program evaluation, and other management functions;
 - To comply with government and Funder reporting obligations;
 - For research, data analysis, and community reporting purposes, including reporting to the GA HMIS Steering Committee to inform policy decisions; and
 - When required by law.
2. DCA (including DCA's contractors), CoC Administrator Agencies, and the GA HMIS Participating Agencies use only lawful and fair means to collect and/or maintain personal information.
3. By seeking assistance at one of the GA HMIS Participating Agencies and providing personal information, it is assumed that a person consents to the collection of information as described in this notice and that the collected information may be entered into the GA HMIS.
4. DCA (including DCA's contractors), CoC Administrator Agencies, and the GA HMIS Participating Agencies may also obtain information about those seeking services from:
 - Other individuals who are accompanying the person seeking services, such as a guardian, caretaker, or advocate;
 - Referring organizations and/or service providers (with proper written consent);
 - DCA's contractors and/or GA HMIS Participating Agency users that are providing services.
5. GA HMIS Participating Agencies are required to post a sign at their intake desks or offices explaining the reasons personal information is requested. GA HMIS Participating Agencies may have additional policies not required by DCA that they must follow, but at a minimum, they must adhere to this Notice. While GA HMIS Participating Agencies are required to adopt their own privacy policies and postings for data collection unrelated to GA HMIS, DCA provides a posting template to GA HMIS Participating Agencies which reads:

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Privacy Posting

Georgia Homeless Management Information System

The U.S. Department of Housing and Urban Development (HUD) and other federal and state partners require that each jurisdiction that receives homeless funding have a Homeless Management Information System (HMIS) in place. Therefore, this Agency is required to participate in the GA Homeless Management Information System (GA HMIS), a computerized system that collects and stores basic information about the persons who receive services from this Agency. The goal of the GA HMIS is to assist us in determining your needs and to provide a record for evaluating the services we are providing to you.

We only collect information that is needed to provide you services, or that we consider relevant to helping us understand the scope and dimensions of homelessness in order to design effective service delivery. We do not use or disclose your information without written consent, except when required by our funders or by law, or for specific administrative or research purposes outlined in our privacy policy. By requesting and accepting services from this project, you are giving consent for us to enter your personal information into the GA HMIS.

The collection and use of all personal information is guided by strict standards of confidentiality as outlined in our privacy policy. A copy of our agency's Privacy Policy and a copy of the Georgia HMIS Privacy Policy is available upon request for your review.

C. Usage and Disclosure of Personal Information

1. **DCA, CoC Administrator Agencies, and the GA HMIS Participating Agencies** may use or disclose personal information for the following purposes:
 - a) To provide or coordinate services for individuals to help them end their homelessness. GA HMIS may be used to share portions of client records (with written consent) with GA HMIS Participating Agencies that, at a minimum, must adhere to this notice and may have additional privacy policies and that may allow different uses and disclosures of the information;
 - b) For functions related to payment or reimbursement for services;
 - c) To carry out administrative functions, such as legal, audit, personnel, oversight, contract monitoring, program evaluation, and other management functions;
 - d) When required by law to the extent that use or disclosure complies with and is limited to the requirements of the law.
 - e) To avert a serious threat to health or safety if:
 - It is believed in good faith 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

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- The use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat.
- f) To report about an individual that DCA, a CoC Administrator Agency, or a GA HMIS Participating Agency reasonably believes 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 under any of the following circumstances:
- where the disclosure is required by law and the disclosure complies with and is limited to the requirements of the law;
 - if the individual agrees to the disclosure; or
 - to the extent that the disclosure is expressly authorized by statute or regulation; and
 - DCA, a CoC Administrator Agency, or a GA HMIS Participating Agency believes the disclosure is necessary to prevent serious harm to the individual or other potential victims; or
 - if the individual is unable to agree because of incapacity, then a law enforcement or other public official authorized to receive the report must represent that the PPI for which disclosure is sought is not intended to be used against the individual, and must represent 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
 - when DCA, a CoC Administrator Agency, or a GA HMIS Participating Agency makes a permitted disclosure about a victim of abuse, neglect or domestic violence, DCA, the CoC Administrator Agency, or the GA HMIS Participating Agency will promptly inform the individual who is the victim that a disclosure has been or will be made, except if:
 - i. in the exercise of professional judgment DCA, the CoC Administrator Agency, or the GA HMIS Participating Agency believes informing the individual would place the individual at risk of serious harm, or
 - ii. DCA, the CoC Administrator Agency, or the GA HMIS Participating Agency would be informing a personal representative (such as a family member or friend) and reasonably believe the personal representative is responsible for the abuse, neglect or other injury; such that informing the personal representative would not be in the best interests of the individual as DCA determines in the exercise of professional judgment.

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- g) To a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct) under the following circumstances:
- In response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena;
 - If the law enforcement official makes a written request for PPI that:
 - i. is signed by a supervisory official of the law enforcement agency seeking the PPI;
 - ii. states that the information is relevant and material to a legitimate law enforcement investigation;
 - iii. identifies the PPI sought;
 - iv. is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought; and
 - v. states that de-identified information could not be used to accomplish the purpose of the disclosure.
 - If it is believed in good faith that the PPI constitutes evidence of criminal conduct that occurred on the premises of DCA or the premises of a GA HMIS Participating Agency;
 - In response to a written request as described above 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
 - If 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 if the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which it is sought.
- h) To comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.
2. ***DCA and CoC Administrator Agencies*** may use or disclose personal information for activities set forth below and for activities DCA determines to be compatible with such activities. DCA assumes that you consent to the use or disclosure of your personal information for such purposes.
- a) To carry out maintenance and operation of GA HMIS.

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- b) To create de-identified (anonymous) information that can be used for research and statistical purposes without identifying clients.
 - c) For academic research purposes, release of PPI will be allowed if research is:
 - Conducted by an individual or institution that has or enters into a formal relationship with DCA and/ or with a CoC Administrator Agency, if the research is conducted by either:
 - i. 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 DCA and/ or the CoC Administrator Agency, (other than the individual conducting the research); or
 - ii. an institution for use in a research project conducted under a written research agreement approved in writing by DCA and/ or the CoC Administrator Agency; and
 - The formal relationship is contained in a written research agreement that must:
 - i. establish rules and limitations for the processing and security of PPI in the course of the research;
 - ii. provide for the return or proper disposal of all PPI at the conclusion of the research;
 - iii. restrict additional use or disclosure of PPI, except where required by law;
 - iv. require that the recipient of data formally agree to comply with all terms and conditions of the agreement;
 - The written research agreement 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
3. Before DCA, a CoC Administrator Agency, or the GA HMIS Participating Agencies make any use or disclosure of your personal information that is not described herein and above, we will seek your consent.

D. How to Inspect and Correct Personal Information

1. Clients may inspect and have a copy of their PPI that is maintained in GA HMIS, with the exception of case notes. DCA, a CoC Administrator Agency, and/or the GA HMIS Participating Agency, will respond to any such request made by a client within a reasonable time frame, usually 2-3 business days. GA HMIS Participating Agency staff will offer to explain any information in the file. For data that is maintained by DCA as the administrator of GA HMIS but was not entered by the DCA staff, DCA may require that the request for inspection be managed through the GA HMIS Participating Agency that entered the information.

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2. DCA, a CoC Administrator Agency, and/or the GA HMIS Participating Agency will consider requests for correction of inaccurate or incomplete personal information from clients. If DCA, a CoC Administrator Agency, and/or the GA HMIS Participating Agency agrees that the information is inaccurate or incomplete, the personal information may be deleted or supplemented with additional information.
3. To inspect, get a copy of, or ask for correction of personal information, a client can contact any GA HMIS Participating Agency staff member at the GA HMIS Participating Agency at which he or she received services. The appropriate GA HMIS Participating Agency staff member will be located to assist with the review and/or correction of the file within a reasonable time period, usually 2-3 business days.
4. DCA, a CoC Administrator Agency, and/or a GA HMIS Participating Agency may deny a direct request for inspection or copying of personal information if:
 - the information was compiled in reasonable anticipation of litigation or comparable proceedings;
 - the information is about another individual;
 - the information was obtained under a promise of confidentiality and if the disclosure would reveal the source of the information; or
 - disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.
5. If a request for access or correction is denied, the organization that denies the request (DCA, the CoC Administrator Agency, and/or the GA HMIS Participating Agency) will explain the reason for the denial. DCA, the CoC Administrator Agency, and/or the GA HMIS Participating Agency will also include, as part of the personal information that is maintained, documentation of the request and the reason for the denial.
6. DCA, a CoC Administrator Agency, and/or a GA HMIS Participating Agency may reject repeated or harassing requests for access or correction

E. Data Quality

1. The Collaborative collects only personal information that is relevant to the purposes for which it plans to use it or as required for reporting to our Funders. To the extent necessary for those purposes, The Collaborative seeks to maintain only personal information that is accurate, complete, and timely.

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2. DCA may implement 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, DCA may choose to remove identifiers from the information so that the data can be maintained for analysis purposes.
3. DCA may keep information for a longer period if it chooses or if it is required to do so by statute, regulation, contract, or other requirement.

F. Complaints and Accountability

1. DCA, on behalf of The Collaborative, accepts and considers questions or complaints about GA HMIS' privacy and security policies and practices. To file a complaint or question, a person should do the following:
 - If the complaint is about one of the GA HMIS Participating Agencies using GA HMIS, the client should first follow the questions and/or grievance procedure of that organization. If the grievance cannot be resolved at the GA HMIS Participating Agency level, the question/complaint should be addressed to DCA in writing or in person for resolution. DCA's main office is located at 60 Executive Park South, Atlanta, GA 30329. DCA's phone number for purposes of GA HMIS is (404) 679-4840;
 - If the complaint is received by DCA, in writing or in person, about a GA HMIS Participating Agency or about an internal program, it will be reviewed by the staff responsible for administering GA HMIS first. If the question or complaint cannot be resolved at that level it will be brought to the attention of the GA HMIS Steering Committee and/or DCA's Office of General Counsel, whichever is most appropriate for the particular situation.
2. All members of DCA (including employees, volunteers, affiliates, contractors and associates), CoC Administrator Agencies and GA HMIS Participating Agencies are required to comply with this notice. Each individual with access to GA HMIS must receive and acknowledge receipt of a copy of this notice and pledge to comply with this notice in writing.

G. Privacy Policy Change History

Each copy of this notice will have a history of changes made to the document. This document's change history is as follows:

- Version 1 – 2005 - Initial Policy
- Version 2 – New policy Draft (Insert approval date here and remove drafts below)
 - October 19th, 2015 (Initial revised Draft)
 - Appendix D: GA HMIS Client Consent Form December 14th, 2015 (2nd revised Draft)
- Version 3 – GA HMIS Interim Policies and Standard Operating Procedures
 - December 2017
- Version 4 – GA HMIS Policies and Standard Operating Procedures – January 2018

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Appendix D: GA HMIS Client Consent Form

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Appendix D: GA HMIS Client Consent Form

Georgia Homeless Management Information System (GA HMIS) Collaborative Client Consent to Share Information

The Georgia Homeless Management Information System (“GA HMIS”) is an online database that is used to collect information (data) about clients accessing housing and homeless services throughout the State of Georgia. Organizations that receive homeless funding from the US Department of Housing and Urban Development (HUD) and other federal and state partners are required to collect and store basic information about the persons who receive their services. This organization participates in the GA HMIS and by requesting and accepting services from this agency you are providing consent to enter your personal information into the GA HMIS. This information is utilized to determine your needs and provide supportive services to you and your household, and information is shared with other organizations that use this database, based on your signed consent.

What type of information may be shared in the HMIS?

We collect general and Protected Personal Information about you and record it in GA HMIS. Depending on your situation, this may include, but is not limited to:

- Your basic identifying information (including name, Social Security Number, date of birth, gender, race/ethnicity, marital and family status, household relationships, contact information, veteran status, disability status, etc.)
- Your history of homelessness and housing (including your current housing status and where and when you have accessed services)
- Your income information (sources and amounts of household income, employment information, work skills) and other resources, such as non-cash benefits
- Your legal history/information
- Your general, self-reported medical history including any mental health and substance abuse issues (however, detailed medical or treatment information will never be shared), and type of health insurance
- Your service needs and the outcomes of services provided
- Your emergency contact information

How do you benefit from sharing your information?

The information you provide to GA HMIS helps us coordinate the most effective services for you and/or your family. By sharing your information, you may be able to avoid being screened more than once, get faster and more personalized services, and minimize how many times you have to tell your ‘story.’ Collecting this information also gives us a better understanding of homelessness in your local area and the effectiveness of the services provided in your area.

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Who can have access to your information?

The GA HMIS participating organizations can have access to your data. These organizations may include homeless service providers, other social services organizations, housing providers, and healthcare providers. System users at participating organizations who have access to your information have signed an agreement to maintain the security and confidentiality of your information.

How is your personal information protected?

Your information in the HMIS is secured by passwords and encrypted transmission technology. In addition, each participating organization and system user must sign an agreement to maintain the security and confidentiality of the information. Your information is protected by the federal HMIS Privacy Standards. In some instances, depending on the services provided by a participating organization, your information may also be protected by additional Federal and/or State regulations, which may require additional written consent prior to any disclosure.

By signing below, you understand that:

- You have the right to receive services even if you do not sign this consent form.
- Signing this consent form does not guarantee you services.
- You have the right to receive a copy of this consent form.
- Your consent allows your record to be updated by any participating organization with which you interact without you being required to sign another consent form.
- This consent is valid for seven (7) years from the date after the Protected Personal Information was created or updated.
- You may cancel your consent at any time, but your cancellation must be done either in writing or by completing the Client Revocation of Consent to Share Information form. You further understand that any cancellation of this consent will not retroactively change information that has already been disclosed or actions already taken under your previous authorization.
- The GA HMIS Privacy Policy contains more detailed information about how your information may be used and disclosed.
- Upon your request, we will provide you with:
 - A copy of the Client Revocation of Consent to Release Information;
 - A copy of the GA HMIS Privacy Policy;
 - A copy of your full HMIS records (apart from case notes) within five (5) business days of your request;
 - A current list of participating organizations that have access to your data.
- If you find inaccurate or incomplete Protected Personal Information in your records, you have the right to request a correction.
- Aggregate or statistical data that is released from HMIS will not disclose any of your Protected Personal Information.

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- You have the right to file a grievance against any organization you feel has violated your confidentiality.
- If you need to be referred to another agency for services, certain information may need to be forwarded through HMIS to facilitate a referral. If you do not provide consent to share your information, it may negatively affect participating providers from addressing your service needs in a coordinated fashion.
- You are not waiving any rights protected under Federal and/or Georgia law.

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SIGNATURE AND ACKNOWLEDGEMENT

Your signature below indicates that you have read (or been read) this client consent form and have received answers to your questions. Please indicate your sharing preference by choosing one of the options below:

- I consent to allow my information, and that of my minor children (if applicable, as listed below), to be shared via the GA HMIS as described in this consent form.
- I consent to allow my information, and that of my minor children (if applicable, as listed below), to be shared via the GA HMIS; however, I wish to limit that sharing as specified in the Client Consent to Share Information – Supplement form.
- I do not consent to allow my information to be shared via the GA HMIS. I understand that this choice may negatively affect the quality of services the GA HMIS participating providers are able to provide.

Client/ Legal Guardian Name (Please print): _____ **DOB:** _____

Last 4 digits of SS _____

Signature _____ Date _____

Minor Children (if any):

Client Name: _____ DOB: _____ Last 4 digits of SS _____

Client Name: _____ DOB: _____ Last 4 digits of SS _____

Client Name: _____ DOB: _____ Last 4 digits of SS _____

For Agency Personnel Use Only:

Print Name of Organization

Print Name of Organization Staff

Signature of Organization Staff

Date

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Appendix E: GA HMIS GA HMIS Custom Development Policy

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Appendix E: GA HMIS Custom Development Policy

The GA HMIS Collaborative has approved the following policy for a CoC or federal partner (SSVF, VA, PATH and HOPWA) who desires to enhance or customize Georgia's HMIS system. GA HMIS Bylaws and Policies require that any CoC or federal partner (collectively, "HMIS Partners") abide by HMIS Standard Operating Procedures.

Georgia Housing Finance Agency (GHFA) is under a contract with Eccovia to provide HMIS services ("GA HMIS Agreement"). The Georgia Department of Community Affairs (DCA) administers the HMIS system and is charged with ____ as the HMIS Lead. Any HMIS Partner's customization or enhancement of the HMIS system must adhere to the GA HMIS Agreement and this policy.

- A. Initiation of HMIS Customization or Enhancement. Any HMIS Partner may initiate a discussion with Eccovia to draft a concept or specification documents. This specification process must be wholly at Eccovia or the HMIS Partner's expense. DCA nor GHFA will be subject to time or costs for specification discussions without DCA's written consent. If a HMIS Partner requests DCA's participation in the specification process, DCA's time will not exceed 15 hours unless otherwise directed by the GA HMIS Collaborative.
- B. Approval by DCA. After a HMIS Partner has completed the specification process and documented a scope of work, the HMIS Partner will submit the proposed work for DCA's approval.
 - a. DCA shall not unreasonably withhold approval.
 - b. Approval will not exceed ten (10) business days absent extraordinary circumstances. If there are extraordinary circumstances, DCA will notify the HMIS Partner at least five (5) business days in advance.
 - c. DCA will review the proposed scope of work to:
 - i. Evaluate the scope's consistency with HUD regulations or contractual requirements;
 - ii. Whether the proposed scope of work will interfere with the HMIS system's normal operations; and
 - iii. The scope's consistency with this policy and the GA HMIS Agreement.

DCA will note any concerns and notify the HMIS Partner. DCA's concerns must be resolved prior to DCA granting approval.

- C. Funding. Any customization or enhancement projects that use funds allocated to the HMIS Partner via the GA Cost Sharing Plan must adhere to GHFA and HUD requirements. DCA must agree to any funding commitments regarding funds allocated to DCA. No other agency or entity may obligate DCA time or resources. Payments to Eccovia must be distributed across the term of any agreement and associated with concrete measurable deliverables. The CoC and DCA will

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document a payment schedule to ensure that no payment is duplicated and that sufficient funds are retained until the final deliverable to ensure Eccovia's compliance with the agreement.

- D. Ongoing Support. Customizing or expanding the HMIS system will require additional DCA time and resources after implementation. Therefore, DCA will calculate an additional charge to the HMIS Partner for ongoing support of the changes calculated on the level of effort and complexity. DCA will provide this cost to the HMIS Partner during the approval process.
- E. Contract Provisions. The agreement between Eccovia and the HMIS Partner shall adhere to the format attached to this policy. The attached agreement contains terms that define the parties' relationships and must be signed by GHFA.

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GA HMIS Custom Development Agreement

THIS AGREEMENT (hereinafter “Agreement”), dated as of the (numeric) day of (month), 2017, is entered into by and between the Georgia Housing and Finance Authority (“GHFA”) and (name of Continuum of Care), (“CoC”) and Eccovia, Inc. (“Eccovia”).

WHEREAS, GHFA entered into an agreement with Eccovia on October 12, 2016 for HMIS software services (“GA HMIS Agreement”); and

WHEREAS, the CoC desires to develop or customize the HMIS system to provide additional functionality and services; and

WHEREAS, the GA HMIS Agreement prohibits Eccovia from developing or customizing the HMIS system without GHFA’s consent; and

[if GHFA responsible to pay]: WHEREAS, CoC was awarded a HMIS grant through HUD’s NOFA application process; and

[if GHFA responsible to pay]: WHEREAS, GHFA, as directed by HUD, is responsible to administer CoC’s HMIS grant; and

WHEREAS, GHFA consents to the CoC contracting for development or customization of the HMIS [if GHFA responsible to pay]: and agrees to issue payment from the CoC’s HMIS grant for such services pursuant to the terms of this Agreement.

NOW, THEREFORE, the parties hereby agree as follows:

1. Scope of Work. Eccovia shall perform fully and faithfully the services described in Exhibit A (“Scope of Work”), attached hereto and incorporated by reference.

2. Pricing. Eccovia agrees to provide the services described in the Scope of Work _____ [add] _____.

[If CoC is responsible to pay]: CoC must adhere to Eccovia’s standard terms, which generally provide for a portion due upon execution then additional invoices due as the project deliverables are completed. Invoices are due net 30 days.

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[If GHFA responsible to pay]: GHFA must adhere to Eccovia’s standard terms, which generally provide for a portion due upon execution then additional invoices due as the project deliverables are completed. Invoices are due net 30 days.

3. Termination. GHFA, Eccovia or CoC may terminate this Agreement pursuant to the termination provisions in the GA HMIS Agreement. Termination of this Agreement will not affect the GA HMIS Agreement. Eccovia shall receive payment for all services performed up to the effective date of cancellation.

4. This Agreement is subject to GA HMIS Agreement. This Agreement, including any development or customization of the HMIS system pursuant to this Agreement, must adhere to requirements and restrictions in the GA HMIS Agreement, which is attached hereto and incorporated by reference, including but not limited to the following provisions:

Section 2, “Approval of Material Changes”: GHFA must approve any changes to the HMIS prior to implementation.

Section 5(E), “Satisfaction”: All work performed on the HMIS shall be done to the reasonable satisfaction of DCA.

Section 5(F), “Standards”: The HMIS shall comply with all data and technical standards set forth by HUD.

5. Responsible Parties. Subject to the terms and provisions of this Agreement, the CoC is solely responsible to monitor and ensure that Eccovia completes the deliverables as defined in the Scope of Work. GHFA shall not be responsible to monitor Eccovia’s compliance with the Scope of Work. However, GHFA has the discretionary right to determine that Eccovia has failed to complete a deliverable or has violated the terms of this Agreement or the GA HMIS Agreement. In the event GHFA makes this determination, GHFA may require that Eccovia and/or the CoC remedy the failure or violation.

The CoC shall designate a project manager to oversee this Agreement and Eccovia’s performance.

6. GHFA’s Limited Liability. Any dispute by CoC regarding Eccovia’s performance under this Agreement shall only be between Eccovia and CoC [if GHFA responsible to pay]: and shall not affect GHFA’s duty to pay. CoC shall not hold GHFA liable for claims or damages relating to Eccovia’s performance or nonperformance under this Agreement [if GHFA responsible to pay]: or GHFA’s release of funds to Eccovia.

[if GHFA responsible to pay]: The parties recognize that CoC has an interest in funds paid by GHFA from its HMIS grant and shall have the right to recover same from Eccovia if warranted and in addition to any

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other allowed damages in the event of Eccovia's breach of this Agreement. Payment in full by GHFA shall release GHFA from any liability under this Agreement but shall not constitute acceptance of the deliverables or operate to bar or waive claims regarding Eccovia's performance.

7. Indemnification of GHFA. CoC and Eccovia hereby release and discharge GHFA and agree to indemnify, protect and hold harmless GHFA with respect to any claim, demand, liability, loss, penalty, cost or expense (including court costs and reasonable attorneys' fees) arising out of or occurring in connection with this Agreement. The parties intend that GHFA shall not be liable for any costs or damages in connection with this Agreement. CoC and Eccovia shall, at their sole expense, participate in the defense or any suit or action brought against GHFA. No settlement or compromise entered into by CoC or Eccovia stemming from a demand, action or suit shall be effective to bind GHFA unless entered into with GHFA's express written approval.

8. Amendment. No amendment to this Agreement is effective unless reduced to writing and signed by all parties.

9. Conflict. All terms of the GA HMIS Agreement shall be incorporated herein and applicable to the parties' relationships in this Agreement. If there is a conflict between this Agreement and the GA HMIS Agreement, this Agreement will take precedence.

Permanent Supportive Housing Standards of Assistance

Updated May 9, 2018

The Chatham-Savannah Continuum of Care has developed the following program standards to provide specific guidelines, which ensure that people who are in need of homelessness assistance receive a similar, effective level of care no matter which provider serves them.

Admission

All Permanent Supportive Housing (PSH) programs must participate in the Continuum of Care's Coordinated Entry System and must admit only people who have been referred to them by staff at the CoC's Single Point of Entry.

PSH programs are required to verify that the people who they serve are chronically homeless, using HUD's definition of chronicity¹. Verification of disability and income are also required. This information must be documented in accordance with HUD recordkeeping and reporting requirements. Reporting, retention and records access requirements may vary by program funding source.

Diversion

When people experiencing homelessness find resolutions to housing issues on their own, it makes existing Emergency Shelter, Transitional Housing and Permanent Housing resources go further. Emergency Shelters should support clients' self-resolution efforts as appropriate.

Service

Permanent Supportive Housing programs must only provide assistance to individuals with disabilities or families that include at least one adult or child who has a disability.

PSH program participants must enter into a renewable lease or sublease agreement for an initial term of at least one year. Lease payments must not exceed the current Fair Market Rent for Chatham County published by HUD². PH programs must help individuals served to understand and adhere to their lease or sublease.

PSH participants may be required to pay for utilities.

Individuals served by PSH programs must be placed into affordable housing that provides private living areas that are not shared with other tenants.

PSH programs must place no limit on housing tenure.

Organizations operating PSH programs must demonstrate good faith efforts to rapidly rehouse individuals served who have lost their housing due to eviction, when indicated. These efforts must be

¹ ["Flowchart of HUD's definition of chronic homelessness"](#), HUD, 2016

² [Fair Market Rates Documentation System](#), Economic and Market Analysis Division, HUD

documented. Individuals who have been evicted must continue to have access to other care, treatment or services offered by the PH program, to the extent consistent with staff's and other individuals' safety.

PSH programs must work with individuals served to establish regular phone, email or face-to-face contact between each individual and staff. Individuals served should be encouraged to attend PSH program meetings and other activities. These contacts, meetings and activities must be documented.

PSH programs must follow all Coordinated Entry System policies and procedures, and a PSH program representative must regularly attend CoC service provider meetings.

PSH programs must possess at least one form of accreditation, and must provide proof of that accreditation to the Continuum of Care.

Staff

PSH staff must be trained in:

- Evidence based or accepted case management practices, and must use these practices.
- Communication and advocacy skills.

PSH staff must be knowledgeable in Fair Housing rules and regulations. There must be at least one staff member who is skilled in locating properties and negotiating with landlords.

Before an individual is placed into housing, PSH staff must make certain that the housing meets all applicable safety regulations, in accordance with applicable laws and regulations, and PSH program policy.

Recordkeeping

Permanent Supportive Housing programs are required to use the Continuum of Care's Homeless Management Information System (HMIS) and must enter into the HMIS all data required by HUD. They must also fully participate in the Continuum of Care's annual homeless point in time count and the CoC's weekly bed availability reporting process.

PSH programs' internal record keeping processes must minimally meet nonprofit best practices.

Consumer Rights

Permanent Supportive Housing programs must comply with Public Accommodations laws and regulations (such as the [Americans with Disabilities Act](#)), which prohibit exclusion, segregation, and unequal treatment based on protected classes and require reasonable accommodations for people with disabilities.

PSH programs receiving CoC funds must not discriminate against individuals based on the composition of their families, the age of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. However, housing may be limited to families with children who are under the age of 18³.

³ ["Equal Access to Housing Final Rule"](#), HUD, 2012

People entering PSH programs must be provided access to housing without any requirements to participate in social, behavioral or physical health care, treatment or services. PSH providers must respect the right of the individual served to choose, modify, or refuse care, treatment or services at any time.

Individuals served by PSH programs must be informed of the facility's Grievance Policy during the intake process. Sample Grievance Policies are available from the CoC Lead Agency and the CoC.

Each organization operating a PSH program must offer individuals opportunities to provide input to the permanent housing support services program, including serving on committees and governing bodies, and serving as peer advocates.

PSH programs must:

- Educate each individual served about their policies and procedures regarding housing opportunities; the array of care, treatment or services provided by the organization; and how to access after-hours emergency care.
- Evaluate the need for and use a variety of asservice engagement strategies when working with individuals served.
- Be able to demonstrate that, although they cannot require the individual to do so, they encourage the individual on an ongoing basis, through the application of a motivational interviewing approach, to participate in social, behavioral, or physical health care, treatment or services.

Discharges

Permanent Supportive Housing programs are required to have a written discharge policy and are required to enforce it evenly.