



**San Luis Obispo  
Countywide 10 Year  
Plan to End  
Homelessness**

*We envision a future in which the housing and comprehensive services necessary to remain housed are available for all, affording everyone maximum self-sufficiency, and the opportunity to be productive and participating members of our community*

**HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)  
Meeting Agenda**

July 21, 2021, 1 p.m.

Members and the public may participate by Zoom video call:  
<https://us06web.zoom.us/j/82283281567?pwd=RTNYWjI5V2N2QlI5VE16VnZzcnIuMUT09>

Or dial in:  
+1 720 707 2699  
Meeting ID: 822 8328 1567  
Passcode: 909456

1. Call to Order and Introductions
2. Public Comment
3. Consent: Approval of Minutes
4. Action/Information/Discussion
  - 4.1. Discussion Item: Emergency Housing Vouchers
  - 4.2. Action Item: Vote to Recommend Awards for \$3,365,435.40 in Homeless Housing, Assistance and Prevention Program (HHAP) Round 1 Funding
  - 4.3. Action Item: Approve the 2021 Revisions to the San Luis Obispo County CoC HMIS Policies and Procedures
  - 4.4. Discussion Item: Encampment Committee
  - 4.5. Discussion Item: Ten-Year Plan Update
5. Committee Updates
6. Future Discussion/Report Items
7. Updates and Requests for Information

8. Next Meeting: Wednesday 15<sup>th</sup> September at 1pm

9. Adjournment

**HOMELESS SERVICES OVERSIGHT COUNCIL**

**HSOC Meeting**

**May 19, 2021 1:00 p.m.**

**Members and the public were able to participate by Zoom call.**

<b>MEMBERS PRESENT</b>	<b>MEMBERS ABSENT</b>	<b>STAFF &amp; GUESTS</b>
Anna Miller Bettina Swigger Bill Crewe Brenda Mack Carlyn Christianson Caroline Hall Dawn Addis Dawn Ortiz-Legg Devin Drake Grace McIntosh Janna Nichols Jessica Thomas Kathy McClenathen Kristen Barneich Mark Lamore Mary Ann Reiss Nicole Bennett Rick Gulino Scott Smith Shay Stewart Steve Martin Susan Funk Susan Lamont	Amelia Grover Anne Robin Jeff Smith	Abby Lassen Anne Wyatt Brandy Graham Cara Vereschagin Carolyn Berg Christina Trezza-Horn Daniela Garcia Elaine Archer Elaine Mansoor George Solis Jan Maitzen Jeff Al-Mashat Jessica Lorance Joanna Kelsey Nocket Laurel Weir Leon Shordon Lisa Howe Lori Hoffman Mimi Rodriguez Rita Holland Russ Francis Sue Warren Theresa Harpin

		Tom Sherman Wendy Lewis Yael Korin
<b>AGENDA ITEM</b>		<b>CONCLUSIONS/ACTIONS</b>
1. Call to Order and Introductions	Susan Funk called the meeting to order at 1pm.	
2. Public Comment	Kelsey introduced herself as the new Homelessness Response Manager for the City of San Luis Obispo.  Daniela Garcia introduced herself as Classified Coordinator-Homeless & Foster Youth Services with the San Luis Obispo County Office of Education.	
3. Consent: Approval of Minutes		Devin made a motion to approve the minutes, seconded by Kristen. The minutes were approved with all in favor, none opposed and no abstentions.
4. Action/Information/Discussion		
4.1. Discussion Item: Update on Rent Relief Program Implementation	Janna reported on the status of the California COVID-19 Rent Relief Program. There are 178 applications currently in progress in SLO county, and 246 which have been completed. This means that 42% of applications have been started and not completed, which is a concern. 5Cities Homeless	

	<p>Coalition (5CHC) works with anyone who requests assistance with the application; the 42% of people who have started but not completed an application are people who have not requested assistance. Janna has asked the State for people's names so 5CHC can reach out and offer assistance. Janna confirmed that the high proportion of people not completing an application is being seen throughout California. Abby confirmed that many communities are experiencing the same issues, and the County is talking to the State about the issues with the program. There are some differences, in that SLO County's program is part of the State's program, while some other communities have opted to run their programs independently, and so are able to do their own marketing and outreach.</p> <p>More than \$2 million has been requested, and \$30,000 had been paid out as of May 12<sup>th</sup>. Progress has been very slow, as getting people to apply to the program has been a major challenge. 5CHC has found that people have often been paying their rent, at the cost of other debts such as utility bills, which are not eligible expenses under the program. Governor Newsom has introduced a change to the program in which landlords will receive 100% rather than 80% of payment arrears. This may have an effect on the number of people who apply to the program, as landlords will have more incentive to participate.</p> <p>Elaine Mansoor shared that the biggest concern for</p>	
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	<p>the Salvation Army, who are also administering the program, is the unknown timeline. The Salvation Army has not been able to do much outreach so far, as they have not yet received the contract from the State.</p> <p>Janna shared that 5CHC is also experiencing difficulties with outreach, as the program keeps changing. Dawn Ortiz-Legg and Abby are working on ways to improve communications, e.g. through setting up pop up tents or information fairs. The Committee discussed the possibility of pushing a message out on social media. Abby noted that SLO County's publicity must be consistent with the State's, so there may be limitations on what can be done here. County staff will look into this and send a follow up to the full HSOC.</p>	<p>County staff to look into what can be done regarding social media messaging about the Rent Relief program, and send a follow up to the full HSOC.</p>
<p>4.2. Discussion Item: May Update on Homelessness to the Board of Supervisors</p>	<p>Laurel provided some background on the May 4<sup>th</sup> meeting of the Board of Supervisors. County staff provided a report on the homelessness situation in the county, including updates on regional framework, the process for updating the Ten-Year Plan, and the HSOC Encampment Committee's recommendations.</p> <p>Carolyn reported that the Board unanimously supported moving forward with the regional framework and communications strategy. The Homeless Action Team is currently focused on near term actions, e.g. developing safe parking and blue</p>	

	<p>bag programs, but also has longer term plans to build trust with individuals in encampments, to move them towards resources. The County is hoping to recruit a consultant for the Ten-Year Plan update by the end of June.</p> <p>Susan Funk thanked the HSOC members who took the time to call in to the May 4<sup>th</sup> Board of Supervisors meeting with comments in support of the County and HSOC's recommendations on homelessness. Susan noted that the challenge will be how to get all constituencies on board, as no initiative can be successful unless all are involved.</p> <p>In response to a question from Yael about where the Encampment Committee's recommendations are now sitting, Carolyn clarified that the recommendations were incorporated into the report to the Board of Supervisors. The reason the County is focusing only on the safe parking and blue bag programs at present is because these have buy-in from all incorporated Cities and the County. The other recommendations are still options for consideration, but the Cities had concerns with the potential implications of some recommendations, and so more time is needed to explore this. Some of the recommendations will be incorporated into the Ten-Year Plan and Regional Action Plan work.</p> <p>Yael reported that Los Osos Community Advisory</p>	
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	Council (LOCAC) has put together a committee to look into solutions for unhoused residents, and are moving ahead with plans for a tiny house village.	
4.2.1. Ten-Year Plan and Regional Framework Update	Susan Funk reported that County staff have been working on a strategy for the Ten-Year Plan Review Committee, which recommends a relatively small working group to be the core of the work, and which would reach out to the various constituencies including the HSOC, city managers, and the Board of Supervisors. The recommendation is to include an elected official, a representative from a provider agency, County government staff, a representative from the housing community, someone with lived experience of homelessness, and a representative from one of the City governments. The recommendation is to incorporate regional diversity and different perspectives.	
4.3. Discussion Item: American Rescue Plan Act (ARPA)	Laurel shared that the American Rescue Plan Act (ARPA) authorized additional funding for housing programs. One of the upcoming opportunities is Emergency Housing Vouchers. 156 of these vouchers which will be distributed by the Housing Authority of San Luis Obispo (HASLO). The Emergency Housing Vouchers will function like regular housing vouchers, but with an expiration date of 2030. If vouchers are issued then returned, they can only be reissued until September 2023. Referrals will come through the Coordinated Entry system rather than the standard	

	<p>waiting list.</p> <p>Elaine Archer clarified that vouchers will most likely need to be distributed by early 2022. Scott stated that it will be a challenge to find this many rental units, but this is always a challenge that HASLO meets.</p>	
<p>4.3.1. Emergency Homeless Vouchers and Need for Special HSOC Meeting in June</p>	<p>Laurel reported that there is a relatively short turnaround time to get all the Emergency Housing Vouchers leased up. The first step is to draw up a Memorandum of Understanding (MoU) between the Continuum of Care (CoC) and HASLO, so that referrals can be made from the Coordinated Entry system to HASLO. Because of this, there will need to be a special meeting of HSOC in June, to get the MoU approved and sent to the Board of Supervisors in time for HASLO to begin issuing vouchers in July.</p> <p>The Special meeting will most likely be held in the week of June 7<sup>th</sup>. County staff will send out a Doodle poll.</p>	
<p>4.3.2. Supplemental HOME Program Funds</p>	<p>Lori shared that the County will be receiving supplemental HOME program funding of around \$3.3 million through ARPA. This additional funding can be used for eligible activities that go beyond the usual HOME program activities, including tenant based rental assistance, supportive services, and the development and purchase of home units for permanent housing. The County anticipates this</p>	

	funding will form part of the 2022 Action Plan NOFA (Notice of Funding Availability), which will be issued at the beginning of fall.	
4.4. Discussion Item: Upcoming State and Federal Funding Opportunities		
4.4.1. California Emergency Solutions Grant Continuum of Care Allocation	Laurel shared that the State will be issuing its annual ESG (Emergency Solutions Grant) NOFA at the end of May. Once this is released, the County will issue its own RFP (Request for Proposals). The ESG program typically has a very tight turnaround period, but the same eligible activities and will most likely provide the same amount of funding. Given the short windows for applications, agencies considering applying to this program should look at what has been funded in previous years and begin preparing for applications now.	
4.4.2. U.S. Department of Housing and Urban Development (HUD) Continuum of Care Program	Laurel shared that the County is expecting the NOFA for HUD's (US Department of Housing & Urban Development) annual CoC (Continuum of Care) funding program in June-July.	
4.4.3. Governor's Proposed Budget	Laurel shared that the Governor is proposing to provide funding for a second round of the Homekey program. This would release around \$1 billion for the acquisition of motels and other properties to be	

	<p>converted into housing for families experiencing homelessness and families at risk of homelessness. The proposed budget includes increases for other programs that assist homeless people, such as CalWorks, Bringing Families Home, and the Housing Disability and Advocacy Program. The proposed budget also sets aside \$50 million for encampment focused funding, although this will not be a block grant and the State is focusing on very large encampments, so it is not clear if SLO County would receive any of this money.</p>	
<p>4.5. Discussion Item: Homeless Emergency Aid Program (HEAP) Update</p>	<p>Janna provided a report on 5CHC’s youth project, funded through HEAP (Homeless Emergency Aid Program). 5CHC are working in partnership with People’s Self Help Housing to build transitional housing units in Pismo Beach, known as the Pismo Terrace project. This work is expected to be completed in June 2023. On the case management side of this project, 5CHC have had contact with 82 homeless youth, and have reunified 6 youth with family members. Research shows particular youth vulnerabilities within SLO county: youth with low household income are at 162% increased risk of homelessness; LGBT youth are at 120% increased risk; unmarried parenting youth are at 200% increased risk; and youth with less than a high school diploma or GED are at 346% increased risk of homelessness.</p>	

<p>4.6. Discussion Item: Preventing, Preparing for and Responding to the Impacts of COVID-19</p>	<p>Laurel reported that County Public Health will be closing its mass vaccination clinics on June 4th, and will be providing mobile clinics instead. These can be organized with agencies serving people who are homeless, via this link:  <a href="https://www.recover slo.org/en/mobile-clinics.aspx">https://www.recover slo.org/en/mobile-clinics.aspx</a></p>	
<p>4.6.1. Update on Efforts to Vaccinate People Experiencing Homelessness</p>	<p>Janna reported that the vaccination rate is lagging at around 50% of the county. The Vaccine Task Force is working with Public Health to encourage people in the homeless community to get vaccinated. The one-shot Johnson &amp; Johnson vaccine is now available again, making it easier for people to become vaccinated. Wendy reported that ECHO (El Camino Homeless Organization) has distributed around one hundred vaccines and are in the process of organizing another vaccination drive, but it has taken a lot of work to convince homeless people to get vaccinated.</p>	
<p>4.7. Discussion Item: Winter Warming Centers Recap</p>	<p>Laurel shared that the HSOC Executive Committee received an update on Winter Warming Centers at its April meeting, and asked for the updates to be shared with the full HSOC.</p> <p>Wendy reported that ECHO ran its center from November to the end of March. This center was open every day and provided safe overnight shelter for 141 people, averaging around 15 people per night. Eighteen people who attended have moved into other</p>	

	<p>ECHO facilities, eight of whom are now permanently housed. There was initially some resistance from the local community, but this abated.</p> <p>Grace reported that CAPSLO's (Community Action Partnership of San Luis Obispo) warming center was open from November to March, but only opened if there was a 50% chance of rain or the temperature dropped under 38 degrees. As such, the shelter was only open for 19 nights, but in that time served 79 people, a little under half of whom have since started using CAPSLO's other services.</p> <p>Janna reported that 5CHC operated a warming center on the same parameters as CAPSLO, so this center was also open for 19 nights. They experienced challenges with a location due to sites being closed due to COVID or needed as a vaccination center. A couple of people who attended the warming center have since been housed, and several have engaged in 5CHC's case management program.</p> <p>Caro reported that Los Osos Cares also operated a warming center for 19 nights, providing safe shelter for around 8 people per night. This represents fewer people than in past years, and is most likely due to the breaking up of the encampment at Los Osos some months prior.</p>	
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<p>4.8. Discussion Item: Situational Update/Roundtable</p>	<p>Susan Funk shared that in its April meeting, the HSOC Executive Committee discussed the situation in SLO county. People are becoming homeless faster than agencies can move them into housing, and due to public pressure, the law enforcement response has been to focus on clearing out encampments. There are a lot of efforts to help people at present which are not strategically connected to each other. The Council discussed this and confirmed this is an accurate assessment of the situation. Agencies are now seeing more people approaching for help.</p>	
<p>5. Committee Updates</p>	<p>Scott reported that the Housing Committee’s May meeting was canceled due to a clash with the Board of Supervisors meeting.</p> <p>Janna reported that the Finance &amp; Data Committee met, and looked at the new statewide data collection system. Janna has asked County staff to prepare a data report for an upcoming HSOC meeting.</p> <p>Devin reported that the Services Coordinating Committee met, and all discussion items were covered in this full HSOC meeting, except for an item on coastal outreach events, which the County and agencies are looking into starting back up again in a COVID-safe way.</p> <p>The Encampment Committee did not meet, as its recommendations were going to the Board of</p>	

	Supervisors for review at the time.	
6. Future Discussion/Report Items	None	
7. Next Regular Meeting: Wednesday 21st July at 1pm		
8. Adjournment	Susan adjourned the meeting at 3:15pm.	

**HOMELESS SERVICES OVERSIGHT COUNCIL**  
**HSOC Special Meeting**  
**June 8, 2021 1:00 p.m.**  
**Members and the public were able to participate by Zoom call.**

<b>MEMBERS PRESENT</b>	<b>MEMBERS ABSENT</b>	<b>STAFF &amp; GUESTS</b>
Amelia Grover Anne Robin Bettina Swigger Brenda Mack Carlyn Christianson Caroline Hall Devin Drake Grace McIntosh Janna Nichols Kathy McClenathen Kristen Barneich Mark Lamore Mary Ann Reiss Rick Gulino Scott Smith Steve Martin Susan Funk	Anna Miller Bill Crewe Dawn Addis Dawn Ortiz-Legg Jeff Smith Jessica Thomas Nicole Bennett Shay Stewart Susan Lamont	Abby Lassen Angela Smith Brandy Graham Cara Vereschagin Daniela Garcia Dee Torres Elaine Archer Elaine Mansoor George Solis Jan Maitzen Jeff Al-Mashat Jessica Lorange Kelsey Nocket Laurel Weir Leon Shordon Michael Arcuri Riley Smith Rita Holland Russ Francis Sheena Jones Tom Sherman Wendy Lewis Yael Korin Yesenia Alonso

AGENDA ITEM		CONCLUSIONS/ACTIONS
1. Call to Order and Introductions	Susan called the meeting to order at 1pm.	
2. Public Comment	Devin announced that the League of Women Voters are hosting a panel on homelessness on Monday 21 <sup>st</sup> July, 12 noon-1pm via Zoom. The panel will include Devin, Janna and Susan, with Supervisor Ortiz-Legg moderating. More information to follow.	
3. Action/Information/Discussion		
<p>3.1. Action Item: Vote to 1) authorize the HSOC Chair to sign a Memorandum Of Understanding (MOU) with the Housing Authority of San Luis Obispo for the administration of the Emergency Housing Voucher program, and 2) authorize the HSOC Executive Committee to approve amendments to the MOU if needed at a later date and to report back to the HSOC on any amendments approved by the Executive Committee</p>	<p>Laurel provided some background on this item. Emergency Housing Vouchers are available under the American Rescue Plan Act (ARPA). HASLO (Housing Authority of San Luis Obispo) will receive 156 of these vouchers. The vouchers can only be issued (or reissued if returned) by September 30<sup>th</sup> 2023. Funding for the vouchers will expire in September 2030. Eligibility for these vouchers is more restrictive than regular housing vouchers. Eligible groups are people who are homeless, people at risk of homelessness, and people fleeing domestic violence and human trafficking. Homeless recipients must be referred through Continuum of Care's (CoC's) Coordinated Entry system. A Memorandum of Understanding (MOU) is needed for this to happen. The County has met with HASLO and the agencies involved in Coordinated Entry, and has adapted a template provided by HUD (US Department of Housing &amp; Urban Development) for this purpose. The</p>	

	<p>MOU has been approved by County Counsel, and now needs to be approved by HSOC. The next step is for the Board of Supervisors to approve the MOU at their meeting on June 22<sup>nd</sup>.</p> <p>Elaine Archer shared that HUD may redistribute vouchers, or distribute additional vouchers, depending on how many of the 156 have been issued by November 2021-January 2022.</p> <p>Brenda asked why Transitional Food &amp; Shelter (TFS) are not included on the list of agencies in the MOU. Elaine Archer responded that HASLO will enter into a separate MOU with them. The MOU that HSOC is reviewing is with the Coordinated Entry agencies, which does not include TFS.</p> <p>Bettina asked how the Emergency Housing Vouchers program is being communicated to people on the current waiting list. Elaine Archer responded that HASLO has sent a letter to people on the waiting list, asking them to confirm whether they were homeless when they entered the list (which would make them eligible), and if so, requesting permission to cross-reference their names with the Coordinated Entry list.</p> <p>Susan asked how many people on the current waiting list may be eligible for the Emergency Housing Vouchers. Elaine answered that this is likely to be a low number, as people who are both homeless and</p>	
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	<p>have a disability are eligible for the mainstream vouchers which HASLO received last year. Many people on the waiting list meet this criteria, while there is a much shorter list of people who are homeless but do not have a disability.</p> <p>Susan asked about the priority listing, and whether currently homeless people who are not at high risk of COVID are included. Elaine Archer clarified that homelessness is a requirement for all categories. Scott agreed that this will be made clearer in the MOU.</p> <p>Yael asked if the funding through this program can be used for other activities than paying rent, such as for housing. Laurel confirmed that this program is only for vouchers to pay rent, but there is also supplemental HOME program funding under ARPA, for which the County's Planning &amp; Building Department is receiving around \$3 million. Agencies will be able to apply for this funding via the Planning &amp; Building Department's annual Action Plan application process in the fall.</p> <p>Brenda suggested that case managers help people to fill out forms and find a place to rent, as people facing homelessness are not necessarily in a position where they are able to do this.</p>	<p>Mary Ann Reiss made a motion to authorize the HSOC Chair to sign a Memorandum of Understanding (MOU) with the Housing Authority of San Luis Obispo for the administration of the Emergency Housing Voucher program, and to authorize the HSOC Executive Committee to approve amendments to the MOU if needed at a later date and to report back to the HSOC on any amendments approved by the Executive Committee, seconded by Devin. The motion was passed with all in favor, none opposed and no abstentions.</p>
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<p>3.2. Action Item: Vote to use 1) a Census Methodology for the 2022 Homeless Point in Time Count of Sheltered Persons; 2) an Observational Count Combined with a Sampling Methodology for obtaining demographic and survey information for unsheltered persons experiencing homelessness; and 3) a contractor to plan and carry out the count in accordance with this methodology</p>	<p>George shared that HUD requires CoCs to conduct a full sheltered and unsheltered PIT (Point in Time) Count every two years. 2021 would have been a year that SLO County CoC carried out a full PIT Count, but due to COVID, HUD allowed CoCs to apply for an exception. As such, SLO County CoC only carried out the sheltered count in January. HUD have not yet confirmed that a full sheltered and unsheltered count will be required in 2022, but their direction is that CoCs should plan for one. Planning takes several months, so the County is asking HSOC to approve moving forward with preparations for an observational count of the whole County, a sampling methodology for demographic information, and releasing an RFP (Request for Proposals) to hire a vendor to assist with the planning process. Janna added that the Finance &amp; Data Committee considered this item at their last meeting and are recommending this for approval.</p> <p>Carlyn noted that there were issues with the last observational count, concerning communication with volunteers in a clear and consistent way. There was confusion over what to do depending on the weather, and which volunteers were tasked with going to which groups of unsheltered homeless people.</p>	<p>Carlyn made a motion to use a Census Methodology for the 2022 Homeless Point in Time Count of Sheltered Persons, an Observational Count Combined with a Sampling Methodology for obtaining demographic and survey information for unsheltered persons experiencing homelessness, and a contractor to plan and carry out the count in accordance with this methodology, seconded by Janna. The motion was passed with all in favor, none opposed and no abstentions.</p>
<p>4. Next Regular Meeting: Wednesday 21st July at 1pm</p>		

5. Adjournment	Susan Funk adjourned the meeting at 1:40pm.	
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**HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)  
ACTION ITEM  
JULY 21, 2021**

**AGENDA ITEM NUMBER: 4.2**

**ITEM: VOTE TO RECOMMEND \$3,365,435.40 IN GRANT AWARDS FOR THE COUNTY AND  
COC ALLOCATIONS OF THE HOMELESS HOUSING, ASSISTANCE AND PREVENTION  
(HHAP) PROGRAM FUNDING**

**ACTION REQUIRED:**

Vote to recommend to the Board of Supervisors \$3,365,435.40 in grant awards under the Homeless Housing, Assistance and Prevention (HHAP) Program.

**SUMMARY NARRATIVE:**

On July 31, 2019, the Governor signed into law Assembly Bill 101 (AB101), creating the *Homeless Housing, Assistance and Prevention Program (HHAP)*. HHAP was initially authorized as a one-time, block grant program to support regional coordination and expansion or development of local capacity to address homelessness. Subsequently, a second round of HHAP was authorized in 2020.

The HHAP grant provides funds to Counties, large cities, and Continuums of Care and is administered by the California Homeless Coordinating and Financing Council (HCFC), a subdivision of the California Business, Consumer Services and Housing Agency (BCSH).

***Eligible Activities and Program Considerations***

1. Rental assistance and rapid rehousing;
2. Operating subsidies in new and existing affordable or supportive housing units, emergency shelters, and navigation centers. Operating subsidies may include operating reserves;
3. Landlord Incentives (including, but not limited to, security deposits and holding fees);
4. Outreach and coordination (which may include access to job programs) to assist vulnerable populations in accessing permanent housing and to promote housing stability in supportive housing;

5. Systems support for activities necessary to create regional partnerships and maintain a homeless services and housing delivery system, particularly for vulnerable populations including families and homeless youth;
6. Delivery of permanent housing and innovative housing solutions (such as hotel and motel conversions);
7. Prevention and shelter diversion to permanent housing; and
8. New navigation centers and emergency shelters based on demonstrated need. Demonstrated need for new navigation centers and emergency shelters shall be based on the following:
  - a. The number of available shelter beds in the jurisdiction;
  - b. The shelter vacancy rate in the summer and winter months;
  - c. The percentage of exits from emergency shelters to permanent housing solutions; and
  - d. A plan to connect residents to permanent housing.

Additionally, HSC § 50218(b) mandates that Administrative Entities use at least 8 percent of their funds for services specific to the needs of homeless youth. In addition, up to 7 percent of a program allocation may be used for a jurisdiction's administrative costs incurred to administer the funds. This does not include staff costs or other costs directly related to implementing or carrying out activities funded by the program allocation.

HHAP projects must be consistent with Housing First practices and align with evidenced-based or promising practices as identified in the State's document [Promising & Evidence-Based Practices \(ca.gov\)](#). In addition, the State will measure the success of the HHAP grant not only by specific program outcomes but also in part by whether or not there are decreases in the unsheltered population of homeless persons in the county.

### ***Grant Awards***

Two HHAP grants under Round 1 were awarded to serve homeless persons in San Luis Obispo County: 1) the County was awarded \$1,618,453.62, and 2) the CoC was awarded \$1,746,981.78. The County's Homeless Services Oversight Council (HSOC) has designated the County of San Luis Obispo to be the Administrative Entity (AE) for the CoC's HHAP grant.

On December 6, 2019, the state released the HHAP Notice of Funding Availability (see [https://www.bcsb.ca.gov/hcfc/hhap\\_program.html](https://www.bcsb.ca.gov/hcfc/hhap_program.html)). On December 18, 2019, the Homeless Services Oversight Council (HSOC) voted to prioritize the following activities for HHAP Round 1 funding:

1. Bringing projects funded by the Homeless Emergency Aid Program (HEAP) to completion;
2. Creating new shelter and case management programs on the North Coast; and
3. Projects that fill other critical gaps in the homeless services system.

On January 28, 2020, the Board of Supervisors authorized submission of applications for the two grants of HHAP Round 1 funding available to the county. On May 19, 2020, the California Homeless Coordinating and Financing Council executed Standard Agreements with the County for both the CoC and County allocations.

Due to the impacts of the pandemic and the need to prioritize the award of time-sensitive COVID-related funding, the County delayed issuing the HHAP Round 1 Request for Proposals until Spring 2021.

***Request for Proposals***

On April 20, 2021, the County of San Luis Obispo released the local HHAP RFP (Request for Proposals) and convened a public information session on April 27, 2021 for the purpose of providing relevant information and addressing questions related to the HHAP Round 1 grant from prospective applicants.

**Amounts Available for HHAP Round 1 Application**

<b>County Allocation</b>			
<b>Total HHAP County Allocation</b>	<b>7% Reserve for County Admin*</b>	<b>8% set aside to serve homeless youth**</b>	<b>Total Available for Application</b>
<b>\$1,618,453.62</b>	<b>\$113,292</b>	<b>\$129,746</b>	<b>\$1,505,161</b>

<b>CoC Allocation</b>			
<b>Total HHAP CoC Allocation</b>	<b>7% Reserve for CoC Admin*</b>	<b>8% set aside to serve homeless youth**</b>	<b>Total Available for Application</b>
<b>\$1,746,981.78</b>	<b>\$122,288</b>	<b>\$139,758</b>	<b>\$1,624,693</b>

\*Administrative funds refer to the cost of the County to administer the CoC and County grants. This does not include staff costs or other costs directly related to implementing or carrying out activities funded by the program allocation. These costs should be included in the subrecipient applications.

\*\*A minimum of 8% of total funding is reserved for activities assisting homeless and at-risk youth. Applicants may request more than the minimum amount to assist youth.

### ***Grant Review Committee***

A total of 21 applications were received, requesting a total of \$9,514,720. In a few instances, such as those noted below, duplicate applications were submitted by an agency for each of the two grants. Copies of all applications may be found here: <https://www.slocounty.ca.gov/Departments/Social-Services/Homeless-Services/Funding-Availability.aspx>

Staff conducted threshold reviews of all applications, including checks for debarment, and eligibility of activities. Staff also reviewed and scored applications on project readiness, organizational experience with HMIS (Homeless Management Information System), the extent to which the project was consistent with evidence-based practices, and for North Coast projects, the extent to which the project would add to homeless assistance available on the North Coast.

The Grant Review Committee convened on June 30, 2021, and was staffed by, Laurel Weir, George Solis, Russell Francis, and Leon Shordon. The committee consisted of representatives from the County, local grantmaking institutions, and a non-conflicted representative from the North Coast who was recommended by Supervisor Gibson.

Staff led discussion of the applications and provided information from the staff review. The committee met twice on June 30 with a break in between so that staff could consult with applicants to obtain any additional information needed to help the committee and to consult with the applicant about the impact to the proposed project about the impact of partially funding the project, should the committee decide to recommend partial funding.

After discussion of the applications at the first meeting, the committee met for the second meeting to hear the results of staff inquiries, further discuss the applications and vote on recommendations. In accordance with the HSOC priorities approved for the HHAP Round 1 grant, the committee voted to prioritize bringing HEAP projects to completion and funding one or more projects on the North Coast. To comply with the requirements of the HHAP grant, the Committee also voted to recommend funding for a youth project for each of the HHAP grants (CoC and County).

### ***HEAP Project Review***

Because there was not sufficient funding to fully fund all recommended projects, with regard to HEAP projects, the committee prioritized activities related to capital costs and operational costs to bring programs up to intended staffing. Four applications were received for the HEAP capital projects and two applications were received for HEAP-funded Youth projects. The Housing Authority of San Luis Obispo (HASLO) submitted identical applications for its Paso Homekey and Atascadero Shelter projects for the CoC and County allocations, and People's Self-Help Housing (PSHH) submitted duplicate applications for its Pismo Terrace project.

The 5Cities Homeless Coalition (5CHC) submitted two Youth project applications – one for the CoC allocation and one for the County allocation -- for non-capital projects previously funded by HEAP. These applications were not duplicative and each application proposed separate activities that complemented and enhanced the activities proposed in the other application. Because the projects were not originally HEAP capital projects and because the HHAP grant requires a set-aside for youth funding, the two Youth applications were considered by the committee as youth grants.

### ***North Coast Project Review***

With regard to selecting programs that serve the North Coast, the committee took into consideration a number of factors, including the number of persons who would be housed, the program's expected impact on the unsheltered population on the North Coast, project readiness, program feasibility, and program sustainability.

One project, the Los Osos Tiny House Villages, was removed from consideration because initial staff review determined the capital project was not far enough along in the pre-development process to meet the threshold for project readiness for the HHAP Round 1 grant at this time. After review of applications and additional information obtained by staff from the project applicants, four projects were considered to meet the criteria for consideration as a project serving the North Coast: the Salvation Army's applications under the CoC allocation for Permanent Supportive Housing Operations and for their Permanent

Supportive Housing II program; an application from Transitions Mental Health Association for a North Coast Housing program, and an application from the Community Partnership of San Luis Obispo for Outreach and Case Management. The committee voted to recommend three years of funding for TMHA's proposed project and one year of funding for CAPSLO's street outreach program that serves the North Coast.

### ***Youth Project Review***

Two youth-focused project applications were received. The 5Cities Homeless Coalition submitted one application under each of the two grants. The applications were not duplicative and were intended to be complementary, such that both projects, when fully funded, would equal one complete youth project.

The committee recommended full funding for the two youth projects and gave staff direction to review all recommended projects that applied for both grants and recommend how funding should be split. Staff conducted the review and submitted these recommendations to the committee for final review and approval. To ensure all activities proposed in the youth projects could be carried out, staff recommended the activities be split across the two grants in a different way than initially proposed in the 5CHC proposals. All activities originally proposed by 5CHC in its two youth grant applications would still be funded under the final recommendations approved by the committee.

### ***Final Recommendations***

The Committee voted to make the following recommendations:

<b>Applicant Agency</b>	<b>Project Name</b>	<b>Allocation</b>	<b>Request</b>	<b>Recommendation</b>
5Cities Homeless Coalition	Youth Program	CoC	\$ 210,844	\$ 179,302 *
		County	\$ 145,534	\$ 177,076 *
PSHH	Pismo Terrace	County	\$ 1,237,345	\$ 1,187,345
HASLO	Rehab	CoC	\$ 1,184,704	\$ 1,048,544
		County		\$ 61,742
TMHA	North Coast	CoC	\$ 454,051	\$ 396,847
CAPSLO	40 Prado	County	\$ 157,996	\$ 78,998
<b>TOTAL</b>				<b>\$ 3,129,854</b>

\* The total request for the 5Cities Homeless Coalition Youth Program, across both CoC and County allocations, was \$356,378. The total recommendation across the two funding allocations is \$356,378.

### **Financial Considerations**

Approval of this item by the HSOC and the Board would result in over \$3 million in funding being made available to assist homeless persons in the county. Two of the projects being funded – People’s Self-Help Housing’s Pismo Terrace project and the Housing Authority of San Luis Obispo’s Paso Homekey and Atascadero Shelter project – have previously received grants from the Homeless Emergency Aid Program (HEAP). The HSOC had previously voted to prioritize HEAP projects with a goal of bringing those projects to fruition.

### **Staff Comments**

Because there was insufficient funding available to fully fund all the recommended projects, the committee prioritized certain types of activities for each grant and took into consideration grant impacts and other criteria noted above. Additionally, with input obtained by staff from applicants, the committee also considered how partial funding would affect the outcomes, services, and impact of the grant.

With regard to HEAP recommendations, the grant review committee voted to fully fund capital costs requested for the Project Homekey program, along with operational costs to allow the shelter to increase operations from 12 hours to 24 hours a day. The committee also voted to fund the 1 1/2 years of operations of a job training program at the ECHO shelter that would allow ECHO to begin the program that was intended to accompany improvements made from the HEAP grant. The committee also voted to fully fund infrastructure costs for PSHH’s Pismo Terrace project, including costs for new improvements that are needed as a result of the pandemic, but did not include funding for a Housing Navigator position that was not part of the original HEAP grant.

Staff note that the County has a second round of HHAP funding to award later this year and that projects not funded by the HHAP Round 1 grant could be considered for Round 2. In addition, the state budget for Fiscal Year (FY)21-22 will include new funding for two additional rounds of the HHAP grant.

**Appendix A: Funding Requests**

<b>HHAP Round 1 Applications – County Allocation</b>					
<b>Applicant Agency</b>	<b>Project Name</b>	<b>Project Type</b>	<b>Request</b>	<b># People Served</b>	<b>HEAP Continuation?</b>
5Cities Homeless Coalition	5Cities Homeless Coalition Youth Program	Systems Support	\$ 145,534	90	Yes
5Cities Homeless Coalition	South County Homeless Outreach	Outreach & Coordination	\$ 81,440	120	No
5Cities Homeless Coalition	RRH and Homeless Prevention Serving Immigrant Families	Rental Assistance & Rapid Rehousing	\$ 31,366	30	No
Community Action Partnership of San Luis Obispo	40 Prado Outreach and Case Management	Outreach & Coordination	\$ 157,996	700	No
Housing Authority of San Luis Obispo	Rehabilitation and Homeless Services - Paso Homekey & Atascadero Shelter	Permanent Housing & Innovative Housing	\$ 1,184,704	1860	Yes
People's Self Help Housing	Los Osos Tiny House Village	Permanent Housing & Innovative Housing	\$ 650,000	25	No
People's Self Help Housing	Pismo Terrace	Permanent Housing & Innovative Housing	\$ 1,237,345	60	Yes
Salvation Army	The Salvation Army Encampment and Street Outreach Program	Outreach & Coordination	\$ 249,998	700	No

Attachment 4.2

Salvation Army	The Salvation Army Homeless Prevention and Rapid Rehousing Program	Rental Assistance & Rapid Rehousing	\$ 1,079,352	257	No
Stand Strong	Rapid Rehousing for Domestic & Sexual Violence Survivors	Rental Assistance & Rapid Rehousing	\$ 35,000	229	No
Transitional Food & Shelter	Medically Fragile Homeless(MFH): Increased Capacity Sustained	Operating Subsidies	\$ 150,241	48	No
Transitions Mental Health Association	4th Street Studios	Permanent Housing & Innovative Housing	\$ 400,000	20	No

<b>HHAP Round 1 Applications – CoC Allocation</b>					
<b>Applicant Agency</b>	<b>Project Name</b>	<b>Project Type</b>	<b>Request</b>	<b># People Served</b>	<b>HEAP Continuation?</b>
5Cities Homeless Coalition	5Cities Homeless Coalition Homeless Youth Program	Systems Support	\$ 210,844	65	Yes
5Cities Homeless Coalition	South County Homeless Outreach	Outreach & Coordination	\$ 82,466	120	No
5Cities Homeless Coalition	RRH and Homeless Prevention Serving Immigrant Families	Rental Assistance & Rapid Rehousing	\$ 31,366	30	No

Attachment 4.2

Housing Authority of San Luis Obispo	Rehabilitation and Homeless Services - Paso Homekey & Atascadero Shelter	Permanent Housing & Innovative Housing	\$ 1,184,704	1860	Yes
People's Self Help Housing	Pismo Terrace	Permanent Housing & Innovative Housing	\$ 1,237,345	60	Yes
Salvation Army	The Salvation Army Permanent Supportive Housing Operations	Operating Subsidies	\$ 323,862	8	No
Salvation Army	The Salvation Army Permanent Supportive Housing (PSH) House II	Permanent Housing & Innovative Housing	\$ 375,000	4	No
Transitional Food & Shelter	Medically Fragile Homeless (MFH): Increased Capacity Sustained	Operating Subsidies	\$ 212,106	48	No
Transitions Mental Health Association	North Coast Housing	Outreach & Coordination	\$ 454,051	700	No

**HOMELESS SERVICES OVERSIGHT COUNCIL (HSOC)  
ACTION ITEM  
July 21, 2021**

**AGENDA ITEM NUMBER: 4.3**

**ITEM:** Approve the 2021 revisions to the San Luis Obispo County CoC HMIS Policies and Procedures

**ACTION REQUIRED:** Vote on the recommendation of the HSOC Finance and Data Committee to approve the 2021 revisions to the San Luis Obispo County CoC HMIS Policies and Procedures

**SUMMARY NARRATIVE:**

A Homeless Management Information System (HMIS) is a local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Each Continuum of Care (CoC) is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards. The HSOC designated the County of San Luis Obispo as the lead agency for HMIS per 24 CFR 578.7, and employs the System Administrator.

The Responsibilities of the CoC, per 24 CFR 578.7, also states that the CoC, in consultation with the collaborative applicant and the HMIS Lead, must develop, follow, and update annually a governance charter, which will include all procedures and policies needed to comply with subpart B, and with HMIS requirements as prescribed by HUD.

The San Luis Obispo County CoC HMIS Policies and Procedures were last updated in October 2016. HUD Technical Assistance reviewed the 2016 version of the HMIS Policies and Procedures and provided feedback and recommendations to HMIS staff in Fall of 2019.

In 2020, HMIS staff, based on recommendations from HUD Technical Assistance, updated the HMIS Participating Agency Agreement, HMIS Privacy Policy, HMIS Privacy Posted Notice and the HMIS Grievance Form, in consultation with the HSOC Finance and Data Committee and with approval from the full HSOC. The above-mentioned revised documents are incorporated into the revised HMIS Policies and Procedures by way of reference.

On July 7<sup>th</sup>, 2021, the HSOC Finance & Data Committee voted to approve the 2021 revisions to the HMIS Policies and Procedures and send to the full HSOC for approval.

**BUDGET/FINANCIAL IMPACT:**

No financial impact to the HSOC

**STAFF COMMENTS:**

Staff recommends that this item be adopted to be in compliance with 24 CFR 578.7.

San Luis Obispo County Continuum of Care  
Homeless Management Information System

# **Policies and Procedures**

Originally approved: 1/1/2010

County Of San Luis Obispo  
3433 S. Higuera St  
San Luis Obispo, CA 93401  
(805) 781-1600

Version 2 November 27, 2012  
Version 3 January 6, 2014  
Version 4 October 27, 2016  
Version 5 Summer 2021

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## **Contact Information**

### **San Luis Obispo Continuum of Care CA-614**

#### **Collaborative Applicant**

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3433 S. Higuera St  
San Luis Obispo, CA 93401

#### **HMIS Lead Agency**

County of San Luis Obispo  
Department of Social Services  
3433 S. Higuera St  
San Luis Obispo, CA 93401

[ss\\_hmissupport@co.slo.ca.us](mailto:ss_hmissupport@co.slo.ca.us)

### **HMIS Vendor**

Bell Data Systems, Inc.  
PO Box 2785  
Matthews, NC 28106

## **Governing Regulations and Standards**

A Homeless Management Information System (HMIS) is the information system designated by a local Continuum of Care (CoC) to comply with the requirements of CoC Program interim rule 24 CFR 578. It is a locally-administered data system used to record and analyze client, service, and housing data for individuals and families who are homeless or at risk of homelessness.

The HMIS Program is administered by the U.S. Department of Housing and Urban Development (HUD) through the Office of Special Needs Assistance Programs (SNAPS) as its comprehensive data response to the congressional mandate to report annually on national homelessness. It is used by all projects that target services to persons experiencing homelessness within SNAPS and the Office of HIV/AIDS Housing. It is also used by other Federal Partners from the U.S. Department of Health and Human Services (HHS) and the U.S. Department of Veterans Affairs and their respective programs to measure project performance and participate in benchmarking of the national effort to end homelessness.

The HMIS Data Standards were first published by HUD in 2004. The original standards served as the foundation for software developers in constructing HMIS applications. HUD, in

collaboration with its Federal Partners, has continued to update the HMIS Data Standards regularly thereafter. Each updated document supersedes the previously released HMIS Data Standards. The most recent HMIS Data Standards can be found on the [HUD Exchange HMIS Data Standards Page](#).

## 1. OVERVIEW

This document provides the framework for the ongoing operations of the San Luis Obispo County CoC Homeless Management Information System hereafter referred to as “HMIS” and “SLO County-HMIS.” HUD requires all grantees and subrecipients receiving Emergency Solutions Grant (ESG) and Continuum of Care (CoC) funds to participate in HMIS, with the exception of domestic violence shelters (DV providers). Comparable databases are required for use by providers of services for victims of domestic violence, as described in the [Violence Against Women Act \(VAWA\)](#). It is the San Luis Obispo County CoC HMIS Lead’s responsibility to ensure the compliance of comparable databases. Other federal and state partners also require HMIS participation for grantees and subrecipients.

While HMIS is not a requirement of all funding sources, SLO County CoC works closely with all agencies regardless of funding source, to articulate the benefits of HMIS and to strongly encourage their participation in order to achieve a comprehensive and accurate understanding of the county’s homelessness response system.

The HMIS and its operating policies and procedures are structured to comply with the most recently released [HMIS Data Standards](#). Recognizing that other Federal, State and local laws may further regulate agencies, the San Luis Obispo County CoC may negotiate its procedures and/or execute appropriate business agreements with Partner Agencies so they are in compliance with applicable laws.

### **Roles and Responsibilities**

The Homeless Services Oversight Council (HSOC) is the CoC Governing Board for the San Luis Obispo County CoC. The HSOC was created by the San Luis Obispo County Board of Supervisors in 2009 to guide and oversee the implementation of the County’s 10-Year Plan to End Homelessness. The HSOC provides oversight for the management and operation of the San Luis Obispo County CoC HMIS.

In 2014, the HSOC designated the County of San Luis Obispo as the HMIS Lead as required by 24 CFR 578.7.

The HSOC Finance and Data Committee is responsible for governance of data collection and reporting, including the bi-annual Point in Time Count and HMIS.

Bell Data Systems, Inc., is the contracted HMIS vendor for the San Luis Obispo County CoC.

### **Governing Principles**

Governing Principles establish the values that are the basis for all policy statements and subsequent decisions.

### **Operating Procedures**

Operating Procedures will provide specific policies and steps necessary to inform, instruct, and educate users of HMIS.

### **Obligations and Agreements**

It is the obligation of each agency to read, understand, and adhere to the policies, procedures, and conditions set forth in this document. All participants in the HMIS agree to follow the policies and procedures set forth by HUD in the current [HMIS Data Standards](#).

## **2. Purpose**

### **Long-term Mission**

The long-term Mission of HMIS is to enhance service delivery and data collection capabilities by sharing information. Accurate information will put the County of San Luis Obispo in a better position to secure funding from various sources and help plan better for future needs.

HMIS is designed to be an integrated network of homeless and other service providers that use a central database to collect, track and report uniform information on client needs and services. This system will not only meet Federal requirements but also enhance service planning and delivery.

### **Fundamental Goal**

The fundamental goal is to document the demographics of homelessness in San Luis Obispo County according to HUD's Strategy for Homeless Data Collection, Analysis and Reporting. Data that is gathered via intake interviews and program participation will be used to complete HUD Annual Reports. Data required by HUD may also be analyzed to provide unduplicated counts and anonymous aggregate data to policy makers, service providers, advocates, and the general public.

### **Potential Benefits**

Potential benefits for homeless men, women, children and case managers include: improved service coordination by sharing information among agencies who are serving the same clients.

Potential benefits for agencies and program managers include a more complete understanding of clients' needs and outcomes through aggregated data, which will also be used to advocate for additional resources, complete grant applications, conduct evaluations of program services, and report to funding agencies such as HUD.

Potential benefits for policymakers lie in the County's participation in HMIS, allowing for the collection of county-wide data, providing the capacity to generate HUD Annual Reports for agencies, and allowing access to aggregate information both at the city and county levels that will assist in the completion of other service reports. This information will be used to inform policymakers addressing homelessness at local, state and federal levels.

### **3. GOVERNING PRINCIPLES**

Described below are the overall governing principles upon which all decisions pertaining to HMIS are based.

Participants are expected to read, understand, and adhere to the spirit of these principles.

#### **Confidentiality**

The protection of clients' rights and privileges is crucial to the successful operation of HMIS. These policies and procedures will ensure clients' privacy without impacting the delivery of services.

Policies regarding client data are founded on the premise that a client owns his/her personal information. Policies are in place to protect client, agency, and the SLO County CoC's interests. Collection, access and disclosure of client data through HMIS will only be permitted by the procedures set forth in this document.

#### **Data Integrity**

Client data is a valuable and sensitive asset of HMIS. These policies will ensure integrity and protection of this asset from accidental or intentional unauthorized modification, destruction or disclosure.

#### **System Availability**

The availability of a centralized data repository is necessary to achieve an aggregation of unduplicated homelessness statistics. The San Luis Obispo County CoC will strive for the broadest deployment and availability of the HMIS.

#### **Compliance**

Violation of the policies and procedures set forth in this document will have serious consequences. Any deliberate or unintentional action resulting in a breach of confidentiality or loss of data integrity may result in the withdrawal of system access for the offending entity.

## **4. ROLES and RESPONSIBILITIES**

### **Homeless Services Oversight Council**

- Provide oversight to the HMIS Lead
- Approval of HMIS policy forms and documentation
- Ensure Agency participation and feedback
- Secure and award HMIS Funding
- Release of aggregate data
- Resolution of breaches in security cases
- Compliance with HMIS Policies & Procedures

### **HMIS Lead**

- Liaison to HUD for HMIS issues
- Negotiate software vendor contracts
- Evaluate potential Partner Agencies for HMIS Participation
- Ensure Compliance with HMIS Policies & Procedures
- Authorized agent for Agency Participation Agreements
- Creation of Project forms and documents
- Maintain up to date information on the HMIS website
- Monitoring end user licenses
- Point of contact with software vendor
- User administration
- Add & Remove user rights
- Manage concurrent licenses
- Develop training curriculum
- Ensure documentation of training
- Provide confidentiality training
- Provide initial software training for Agency Administrators and end users
- Provide end user support
- Review security of Participating Agencies via site visits
- Monitor data quality and timeliness
- Assure vendor adherence to HMIS Data and technical Standards
- Application Customization
- Aggregate data reporting and extraction per agency needs
- Assist Partner Agencies with agency-specific data collection and reporting needs
- Manage User licenses

## **HMIS Partner Agency**

### **Agency Administrator**

- Serve as Authorizing Agent for Partner Agency
- Designate Partner Agency HMIS users
- Designate Partner Agency Technical support
- Monitor Agency compliance with Policies & Procedures
- Hold executed Client Informed Consent forms
- Serve as Authorizing Agent for user ID requests
- Ensure compliance with HMIS Policies & Procedures
- Ensure data quality and timeliness
- Ensure data is corrected on monthly data quality reports or per request of HMIS Lead
- Attend HSOC Finance and Data Committee meetings
- Monitor security of staff workstations
- Maintain their agency's internet connectivity
- Ensure virus protection and spyware detecting software is installed on all computers that access HMIS and ensure a virus scan is run at least once a week
- Run data integrity reports, run down discrepancies and make corrections

### **Partner Agency User**

- Attend and participate in HMIS training provided by the County of San Luis Obispo
- Safeguard client privacy through compliance with confidentiality policies
- Collect data as specified in end user training and as directed in compliance with the HMIS Policies and Procedures
- Enter data within 3 business days of program entry or exit
- Adhere to the HMIS Policies & Procedures

## **5. OPERATING PROCEDURES**

### **HMIS Participation**

Any agency may participate in HMIS if they have an executed [HMIS Participating Agency Agreement](#) with the HMIS Lead and filled out the User Access Request form required for each licensed user. Each participating agency is responsible for their clients' data. Any agency that is a provider of homeless services to clients in and around San Luis Obispo county is eligible and encouraged to participate in contributing data to HMIS. The HMIS Lead will determine if there are available user licenses available within the HMIS grant. The HMIS Lead reserves the right to provide up to two (2) HMIS user

licenses per agency, based on the size of the client population, at no cost to the agency. An Agency may purchase additional user licenses.

Agencies participating in the San Luis Obispo County CoC HMIS shall commit to abide by the governing principles of HMIS and adhere to the terms and conditions set forth in this document and the [HMIS Participating Agency Agreement](#).

## **Minimum Participation Standards**

HMIS partner agencies and users must collect all of the universal data elements, as defined by HUD, for all clients receiving services in programs participating in the San Luis Obispo County HMIS. Additionally, all participating agencies are responsible for ensuring that Common Program Specific Data Elements, as defined by the [HMIS Data Standards](#), are collected from all clients that are served by applicable HUD funded programs. Other optional data elements may also be required for certain programs, as decided by the Homeless Services Oversight Council (HSOC) in partnership with the Coordinated Entry Case Managers.

## **Connectivity and Computer Requirements**

Participating Agencies must have Internet connectivity for each workstation accessing HMIS. To optimize performance, all agencies are encouraged to secure a high speed Internet connection.

## **Site Security**

### **Assessment**

Prior to allowing access to the HMIS, the Partner Agency's Administrator and Technical Support person will meet with the HMIS Lead to review and assess the security measures in place. They will assess agency information security protocols. This review shall in no way reduce the responsibility for agency information security, which is the full and complete responsibility of the Partner Agency, its Agency Administrator, and Technical Support personnel.

### **Annual Security Audit**

Depending on available resources at the County level, an annual security audit will be held to confirm security at participating HMIS Partner Agencies.

### **Workstation**

Prior to requesting user access for any staff member, the Partner Agency Administrator will need to assess the operational security of the user's workspace by confirming that each workstation has:

- Anti-spyware software and virus protection properly installed

- A full-system scan has been performed within the last week
- Each workstation has and uses a hardware or software firewall
- Screens that “go to sleep” after 5 minutes of inactivity and require a password to re-activate
- Screens positioned so that data is not visible to others
- Does not have usernames and/or passwords posted in visible locations

At a minimum, any workstation accessing HMIS shall have anti-virus software with current virus definitions (24 hours) and perform frequent full-system scans (weekly).

## **Training**

All users accessing HMIS must first complete the San Luis Obispo CoC HMIS training. Users must read, understand, and sign the [Partner Agency End User Agreement](#). All users will be held accountable to that agreement. Training for privacy and security measures will occur annually, and all participating agencies and users must attend the training. Additionally, users must pass a test to access the live site. Users must comply with the most recent [HMIS Data Standards](#).

## **Scheduling**

The Partner Agency Administrator will coordinate with the HMIS Lead to schedule training for the users. Users will be trained in the operation of the HMIS (how to access the system, how to enter data, how to run reports). Refresher trainings will be offered throughout the year. Training videos are offered on the County’s HMIS YouTube channel. Prior access to this YouTube channel will be given to each user.

## **Quiz**

At the end of the training, the user will be given an assessment. The user must pass with 80% accuracy before being given access to the system.

## **Follow-up**

The HMIS Lead will provide training with each participating HMIS Partner Agency. Before a Partner Agency “goes live,” the HMIS Lead will make on-site visits as needed to ensure that the HMIS Partner Agency becomes proficient in the use of HMIS.

The HMIS Lead, in partnership with the HMIS vendor will provide regular training for HMIS Users including annual HMIS Data Standard updates, and privacy and security refresher training.

## **User Accounts & Passwords**

### **Adding New Users**

The Partner Agency Administrator will submit a [HMIS User Account Request Form](#) to the HMIS Lead to set-up the user's access in HMIS. The HMIS Lead will not accept HMIS User Account Requests without approval from the Partner Agency Administrator or the Agency Executive Director.

### **Access Rights**

Access to the HMIS will only be approved for those staff members that require access for business purposes only. The user's access rights will be determined by the Partner Agency Administrator and the HMIS Lead.

### **Password and User ID Assignment**

Upon completion of training and signing the [Partner Agency End User Agreement](#), the user will be assigned a unique ID and password to access the rights assigned that user within the HMIS. Users should not allow anyone else use of their assigned unique user ID. A user should never use an ID that is not assigned to them nor should passwords be shared and or communicated in any format. To do so is considered a breach of security and users can have their HMIS access revoked.

### **Changing Passwords**

When the user logs onto the system for the first time they will be prompted to change their password to a password only they know. Passwords must consist of at least 8 characters, a combination of at least one upper case letter, at least one lower case letter, and at least one special character.

Passwords must be changed every 90 days. If they are not changed within that time period, they will expire and the user will be locked out of the system. Three consecutive unsuccessful attempts to login will disable the User ID until the HMIS Lead or Partner Agency Administrator reactivates the account [These standards are required by the software].

In the event a user's password has expired, or the user forgets their password, the HMIS Lead or the Partner Agency Administrator will reset the user's password.

### **Changing Users' Rights**

As a user's needs change, the rights assigned to that user within the HMIS need to change as well. It is important that the Partner Agency Administrator notifies the HMIS Lead of these changes as soon as possible so that rights can be added and removed as appropriate.

### **Deactivating Accounts**

It is important that a user account be deactivated in the system when he or she leaves the agency or otherwise becomes inactive. It is a breach of security to have unused user accounts active. The Partner Agency

Administrator will notify the HMIS Lead within two (2) business days if a staff member leaves the Agency.

Access may be immediately rescinded when any HMIS user is suspected of breaching the [Partner Agency User Agreement](#), violating the Policies & Procedures, or breaching confidentiality or security, while an investigation by the HMIS Lead and the Partner Agency is conducted. If the user is found to have breached or violated the above, and the Partner Agency does not otherwise permanently inactivate the user from the system (termination of employment, reassignment of duties) the HMIS Lead has the right to permanently inactivate the account thereby denying access to the system for that user.

## **Collection and Entry of Client Data**

Each Partner Agency will develop policies, procedures, and confidentiality rules for collecting HMIS data in accordance with the most recent [HMIS Data Standards](#) and their own agency's needs. Client Data will be gathered according to these policies, procedures and confidentiality rules.

### **Client Authorization**

Client Data will only be shared with Partner Agencies if the Client consents, has signed the [Release of Information Authorization](#), and the signed Informed Consent & Release of Information Authorization is available on record. All Universal and Common Program Specific Data Elements from the current [HMIS Data Standards](#) should be collected, subject to client consent. Additional data may also be collected to support other programs.

### **Data Quality Plan**

A Data Quality plan is a systematic approach for the CoC to establish and define data quality expectations. Data quality is a key component for HUD reporting purposes such as the System Performance Measures (SPM), Longitudinal Systems Analysis Report (LSA), Annual Performance Report (APR), Point-In-Time (PIT) Count and Housing Inventory Count (HIC), as well as reporting purposes for federal and state partners. In addition, HUD ties data quality to overall CoC competitiveness for funding.

In order to qualify as “participating in the HMIS,” all HMIS Participating Agencies must meet the data quality benchmarks as described in the [San Luis Obispo County CoC HMIS Data Quality Plan](#). These benchmarks apply to all HMIS Participating Agencies, whether or not the agency provides the data directly into the HMIS or submits it to the HMIS Lead Agency for input into HMIS, including the following mandated projects: HUD Continuum of Care (HUD CoC) & Emergency Solutions Grant (ESG), US Department of Veterans Affairs Supportive Services for Veterans Families (VA SSVF), and US Department of Health and Human Services Runaway and Homeless

Youth (HHS RHY) Substance Abuse and Mental Health Services Administration Projects for Assistance in Transition from Homelessness (SAMHSA PATH).

### **Data Timeliness**

Per the [San Luis Obispo County CoC HMIS Data Quality Plan](#), HMIS data must be entered into HMIS in real time or within three (3) business days from the point of the event (intake/enrollment, service delivery, annual assessments, or exit/discharge).

### **Entry and Exit Data**

Client program entry and exit dates should be recorded for all program participants. Entry dates should record the first day of services or program entry with a new program entry date for each period/episode of services. Exit dates should record the last day of residence in a program's housing before the participant leaves the shelter/housing or the last day a service was provided in a program.

### **Data Quality Monitoring**

The HMIS Lead will perform monthly data integrity checks on the HMIS data, which will include the following steps:

- Run HUD Required Data Elements, Data Incongruities Reports, and other data quality reports based on program, and grant requirements;
- Notify Partner Agency Administrator of findings and timelines for correction;
- Re-run reports for errant agencies/programs, as requested. Follow up with Partner Agency Administrators if necessary;
- Notify Agency Executive Director if Partner Agency Administrators are not responsive to required corrective actions; and
- Notify HSOC Finance and Data Committee regarding any uncorrected data quality issues.

### **Release and Disclosure of Client Data**

Once collected, providers have obligations about how PII (Personally Identifiable Information) may be used and disclosed. Uses and disclosures either are required by HUD (e.g., participants' access to their own information, oversight of compliance with the HMIS data privacy and security standards) or are permitted by HUD (e.g., to provide services, reporting to funders). HUD's required and permitted uses and disclosures must be stated in the [CoC's HMIS Privacy Notice](#).

Per the [2004 HMIS Data and Technical Standards](#), HUD permits the following uses and disclosures of PII without participant consent, provided that the uses and disclosures are listed in the [CoC's HMIS Privacy Notice](#).

If any of these uses and disclosures is not listed in the HMIS Privacy Notice, consent is required:

- To provide or coordinate services to an individual
- For functions related to payment or reimbursement for services
- To carry out administrative functions, including but not limited to legal, audit, personnel, oversight, and management functions
- For creating de-identified information from PII

Per the [2004 HMIS Data and Technical Standards](#), HUD also permits the following types of uses and disclosures of PII without participant consent, provided that these additional uses and disclosures are listed in the Privacy Notice. If any of these uses and disclosures is not listed in the Privacy Notice, consent is required:

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

Per the [2004 HMIS Data and Technical Standards](#), HUD requires two mandatory disclosures regardless of their inclusion in the Privacy Notice:

- Participants' access to their own information
- Disclosures for oversight of compliance with HMIS data privacy and security standards

Certain uses and disclosures may also be prohibited or otherwise restricted by other federal, state, or local laws. For instance, recipients of Violence Against Women Act funding are prohibited from disclosing PII without the participant's written consent.

- The Agency must decide for each of their programs whether to obtain consent through implied (posted privacy notice), verbal, or informed (written authorization) methods. Regardless of the type of consent method used, all consent must be obtained fairly and in good faith. The HUD HMIS Data and Technical Standards allow agencies to collect data using implied consent at minimum, given that some agencies service a high volume of clients. The standards also recognize that there may be a need for greater privacy protection and recommend informed consent in those cases. The three forms of consent are described briefly below.
- **Implied consent** (posted privacy notice): HMIS data collection is explained and the client gives their information freely, without directly being asked to participate.

- **Verbal consent:** The client verbally agrees to participate in HMIS data collection.
- **Informed consent** (written authorization): The client signs a form to agree to participate in HMIS data collection.
- The Agency can decide by program how to obtain consent based on what is the most practical method for the program type (e.g., verbal consent for call-based referrals versus informed consent for housing programs). Consent must be obtained in a consistent manner within each program, meaning that all of a program's clients must provide the same form of consent. Agencies that serve non-English speaking clients should provide consent information in a language that their clients can understand (e.g., Spanish).

### **HMIS Privacy Posted Notice**

HUD's HMIS Privacy and Security Standards specify the guidelines for the privacy and security of personal information collected and stored in an HMIS. The standards require each covered HMIS Participating Agency to publish a [HMIS Privacy Posted Notice](#). The standards establish baseline privacy requirements for the HMIS Participating Agencies. A HMIS Participating Agency must post a sign at each intake desk (or comparable location) that explains generally the reasons for collecting this information. Consent of the individual for data collection may be inferred from the circumstances of the collection.

### **HMIS Privacy Notice**

The [HMIS Privacy Notice](#) applies to all San Luis Obispo County CoC HMIS Participating Providers and addresses how information about clients may be used and disclosed at Providers as well as client rights over their information. The HMIS Privacy Notice may be amended at any time, and amendments may affect information obtained before the date of the amendment. The agency will provide copies of the privacy notice to any client upon request. The agency should also include a copy of the HMIS Privacy Notice on their organization website.

### **Clients' Rights to Data**

Upon written request, clients shall be given a printout of all data specifically relating to them, within 10 working days (or 10 working days after the data has been entered if the data has not been entered at the time the request is made.) A client may also request in writing a report of data sharing events, including dates, agencies, persons, and other details pertaining to their client specific data within 10 working days (or 10 working days after the data has been entered if the data has not been entered at the time the request is made.)

Aggregate data that does not contain any client-specific identifying data may be shared with internal and external agents without specific client permission.

This policy will be made clear to clients as part of the Informed Consent procedure.

### **Grievance Policy**

Per the SLO County HMIS Privacy Notice, the client has the right to ask questions of, or submit grievances to, the provider regarding privacy and security policies and procedures.

The [HMIS Grievance Form](#) will be used for clients who feel their privacy rights have been violated by an HMIS Participating Agency. The form is to only be used after the client has worked with the agency to resolve an HMIS issue. The client will submit the form to the HMIS Lead and will be reviewed by the HSOC Finance and Data Committee to recommend resolution between client and agency.

### **Technical Support**

Support Requests include issue reporting, requests for enhancements (features), or other general technical support shall be submitted by Agency Administrators and users to the HMIS Lead. The HMIS Lead will only provide support for issues specific to the HMIS software and systems, not for technical support of hardware being used by HMIS users.

### **Request for Support**

The following is the preferred procedure when a user requires technical support:

The user should evaluate the immediacy of the issue. If the user needs immediate resolution of the issue because the issue is hindering the user from being able to enter the data into the system, the user should contact the HMIS Lead at [ss\\_hmissupport@co.slo.ca.us](mailto:ss_hmissupport@co.slo.ca.us).

Most common emergent issues are a forgotten password, a password that is not working, or the user is trying to access the system from a computer that he or she has not accessed the system from before.

Bell Data Systems will not issue new user accounts or change user rights without prior authorization from the HMIS Lead.

If the issue is not immediate or is a suggestion, the user should consider discussing it with the Partner Agency Administrator for appropriateness before submitting it. The user or the Partner Agency Administrator may email the HMIS Lead specifying the severity of the issue and its impact on their work, specific steps to reproduce the issue, and any other documentation that might facilitate the resolution of the issue (screen

shots can be very helpful). The user should also provide contact information and best times to be reached. The user is welcome to bring discussions to the annual HMIS conference or to any of the live trainings to discuss enhancements or issues that they may experience while using the system.

### **Changes to the System**

The HMIS Lead, in consultation with the Homeless Services Oversight Council, will evaluate the request and respond accordingly. Agency-specific customizations will be evaluated for their impact on the other agencies usability of the system as a whole.

If the HMIS Lead determines that the cause of the reported issue is outside the scope of control of the HMIS software and systems, the issue may be returned to the User or a meeting with the agency's IT department may be necessary.

The HMIS Lead may consolidate such requests from multiple Partner Agencies, if appropriate, and strive to resolve issues in priority order according to their severity and impact.

In cases where issue resolution may be achieved by the end user or other Partner Agency personnel, the HMIS Lead will provide instructions via email or phone to the Partner Agency.

All necessary customization will be completed by the HMIS Lead.

## **Participation Termination**

### **Agency Termination**

The Partner Agency shall inform the HMIS Lead in writing of their intention to terminate an [HMIS participation agreement](#). The HMIS System Administrator will then inactivate all users from that agency at the appropriate time.

In the unlikely event that a Partner Agency is found to be in violation of the terms of the HMIS, the Partner Agency and the HMIS Lead will work to resolve the conflict(s). If the HMIS Lead is unable to resolve the conflict(s), the Partner Agency will be notified in writing of the intention to terminate that Partner Agencies participation in the HMIS. The HMIS Lead will then inactivate all users from that agency.

All Partner Agency-specific information contained in the HMIS will remain in the system. The agency will be responsible for any cost of obtaining a hard copy or digital copy of HMIS information.

### **User Termination**

If there is a suspected breach in security, especially client confidentiality, the HMIS Lead reserves the right to suspend the user account of the user in question or the entire agency's user accounts, if the problem is agency wide, until the San Luis Obispo CoC is convinced that the client information is secure.

## **CHANGES TO THE POLICIES AND PROCEDURES DOCUMENT**

### **Revisions**

The HMIS Lead will coordinate the compilation and revisions of all HMIS documents in consultation with the HSOC Finance and Data Committee.

### **Distribution**

A copy of the revised Policies and Procedures document will be distributed to the partner agencies. Partner Agencies will be asked to sign a receipt acknowledging they have received the revised Policies and Procedures. It is the agency's responsibility to make sure everyone participating in the HMIS has access to a copy of the document, reads it, understands it, and agrees to comply with it. If anyone participating in the HMIS has issue with any revision, they may contact the HMIS Lead and voice their concern. They must, however, comply with the revisions or stop using the system until the issue is resolved.

### **Funding**

The San Luis Obispo County CoC current HUD grant for HMIS provides support for an HMIS. Therefore, the CoC is committed to providing services to HUD-funded programs, all users, as well as non-funded programs in San Luis Obispo County. The current HUD grant for HMIS provides for a limited number of user licenses. While it may not be possible to meet every agency's full requirements for licenses within the HUD grant, the HMIS Lead will endeavor to ensure that every agency participating will have their minimum requirements met from the HUD grant. The San Luis Obispo County CoC will decide funding responsibilities for additional licenses as the needs arise.

### **HMIS Data Standards**

This document should, at a minimum, reflect the baseline requirements listed in the most current [HMIS Data Standards](#). Users of HMIS are required to comply with the [HMIS Data Standards](#). Failure to comply with these standards carries the same consequences, as does failure to comply with these Policies and Procedures. In any instance where these Policies and Procedures are not consistent with the current [HMIS Data Standards](#), the [HMIS Data Standards](#) take precedence. Should any inconsistencies be identified, notice should be made to the HMIS Lead.

For agencies or programs where HIPAA (Health Insurance Portability and Accountability Act) applies, HIPAA requirements take precedence over both the HUD HMIS Data Requirements and these policies and procedures.

## 6. GLOSSARY OF TERMS

**Bell Data:** The HMIS vendor that is currently used by San Luis Obispo County.

**Client:** Any persons who is, has been, or will be entered into HMIS.

**CoC:** Continuum of Care

**End User:** Any person given access to the database for entering or updating HMIS data.

**HIPAA:** Health Insurance Portability and Accountability Act

**HMIS:** Homeless Management Information System

**HSOC:** Homeless Services Oversight Council

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