Before Starting the CoC Application

The CoC Consolidated Application is made up of two parts: the CoC Application and the CoC Priority Listing, with all of the CoC’s project applications either approved and ranked, or rejected. The Collaborative Applicant is responsible for submitting both the CoC Application and the CoC Priority Listing in order for the CoC Consolidated Application to be considered complete.

The Collaborative Applicant is responsible for:

1. Reviewing the FY 2017 CoC Program Competition NOFA in its entirety for specific application and program requirements.
2. Ensuring all questions are answered completely.
3. Reviewing the FY 2017 CoC Consolidated Application Detailed Instructions, which gives additional information for each question.
4. Ensuring all imported responses in the application are fully reviewed and updated as needed.
5. The Collaborative Applicant must review and utilize responses provided by project applicants in their Project Applications.
6. Some questions require the Collaborative Applicant to attach documentation to receive credit for the question. This will be identified in the question.

- Note: For some questions, HUD has provided documents to assist Collaborative Applicants in filling out responses. These are noted in the application.
- All questions marked with an asterisk (*) are mandatory and must be completed in order to submit the CoC Application.

For CoC Application Detailed Instructions click here.
1A. Continuum of Care (CoC) Identification

Instructions:
For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1A-1. CoC Name and Number:  MO-500 - St. Louis County CoC

1A-2. Collaborative Applicant Name:  Saint Louis County

1A-3. CoC Designation:  CA

1A-4. HMIS Lead:  Saint Louis County
1B. Continuum of Care (CoC) Engagement

Instructions:
For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1B-1. From the list below, select those organization(s) and/or person(s) that participate in CoC meetings. Using the drop-down boxes, indicate if the organization(s) and/or person(s): (1) participate in CoC meetings; and (2) vote, including selection of CoC Board members. Responses should be for the period from 5/1/16 to 4/30/17.

<table>
<thead>
<tr>
<th>Organization/Person Categories</th>
<th>Participates in CoC Meetings</th>
<th>Votes, including electing CoC Board Members</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Government Staff/Officials</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>CDBG/HOME/ESG Entitlement Jurisdiction</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Law Enforcement</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Local Jail(s)</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Hospital(s)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>EMT/Crisis Response Team(s)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Mental Health Service Organizations</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Substance Abuse Service Organizations</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Affordable Housing Developer(s)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Disability Service Organizations</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Disability Advocates</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Public Housing Authorities</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>CoC Funded Youth Homeless Organizations</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Non-CoC Funded Youth Homeless Organizations</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Youth Advocates</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>School Administrators/Homeless Liaisons</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>CoC Funded Victim Service Providers</td>
<td>Not Applicable</td>
<td>No</td>
</tr>
<tr>
<td>Non-CoC Funded Victim Service Providers</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Domestic Violence Advocates</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Street Outreach Team(s)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Lesbian, Gay, Bisexual, Transgender (LGBT) Advocates</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>LGBT Service Organizations</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Agencies that serve survivors of human trafficking</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Other homeless subpopulation advocates</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Homeless or Formerly Homeless Persons</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Other:(limit 50 characters)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Applicant: St. Louis County
Project: MO-500 CoC Registration FY 2017

FY2017 CoC Application Page 3 09/28/2017
Applicant must select Yes, No or Not Applicable for all of the listed organization/person categories in 1B-1.

1B-1a. Describe the specific strategy(s) the CoC uses to solicit and consider opinions from organizations and/or persons that have an interest in preventing or ending homelessness. (limit 1000 characters)

The St. Louis County CoC publicizes meetings via a website, email, and listservs. Our Membership Committee recruits consumer involvement and hosts consumer focus groups to solicit information about gaps, quality, ease of access, and overall satisfaction with services. Homeless/formerly homeless individuals attend CoC meetings, providing feedback on policies and decision making processes. Faith-based organizations attend meetings and offer housing options for consumers. With approximately 90 police departments across the County, participation in the CoC varies. Police Crisis Intervention teams participate in the CoC and annual PIT counts, which has improved our count, as well as referrals and outcomes for consumers. School districts are engaged as well. Finally, our Special Populations and Issues Committee has supported the development of a Youth Advisory Board which engaged in planning for ending youth homelessness.

1B-2. Describe the CoC’s open invitation process for soliciting new members, including any special outreach. (limit 1000 characters)

Applications for new membership are available at all CoC general meetings. Recruitment emails for the CoC are routinely posted on listservs of community led initiatives working to address homelessness including the Homeless Adolescent Task Force and Keeping Kids in District School (KKIDS) Collaborative. The CoC partnered with KKIDS on a back to school event at our September 2017 meeting with school district liaisons presenting information about addressing homelessness in schools. The Membership Committee and the CoC Chair have actively reached out to representatives with transportation, banking, hospital, mental health, and education systems to engage them in the CoC and encourage their membership/participation. Finally, the CoC Membership Committee has organized a “Bring-a-Friend” event for our November 2017 meeting, encouraging members to bring representatives of constituencies not adequately represented in the CoC including housing developers, local businesses, landlords, etc.

1B-3. Describe how the CoC notified the public that it will accept and consider proposals from organizations that have not previously received CoC Program funding in the FY 2017 CoC Program Competition, even if the CoC is not applying for new projects in FY 2017. The response must
include the date(s) the CoC made publicly knowing they were open to proposals.
(limit 1000 characters)

Following St. Louis County Procurement rules, a request for proposals (RFP) was published on August 7, 2017 on the following website: www.stlouisco.com/YourGovernment/CountyDepartments/Procurement. Additionally, the Chair of the CoC sent an email to 351 individuals advising them of the availability of the RFP on the County’s website. Within the RFP, St. Louis County indicated that they were seeking "seeking new project(s) under the 2017 HD Continuum of Care Notice of Funding Availability (page 5)."

Further, the RFP indicated that, "St. Louis County Homeless Services Program intends to be as inclusive as possible in the solicitation. The objective is to receive several high quality proposals that articulate clear and aggressive strategies for housing and other services designed to assist homeless consumers."
1C. Continuum of Care (CoC) Coordination

Instructions:
For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1C-1. Using the chart below, identify the Federal, State, Local, Private and Other organizations that serve homeless individuals, families, unaccompanied youth, persons who are fleeing domestic violence, or those at risk of homelessness that are included in the CoCs coordination; planning and operation of projects. Only select "Not Applicable" if the funding source(s) do not exist in the CoC’s geographic area.

<table>
<thead>
<tr>
<th>Entities or Organizations the CoC coordinates planning and operation of projects</th>
<th>Coordinates with Planning and Operation of Projects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing Opportunities for Persons with AIDS (HOPWA)</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Temporary Assistance for Needy Families (TANF)</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Runaway and Homeless Youth (RHY)</td>
<td>Yes</td>
</tr>
<tr>
<td>Head Start Program</td>
<td>Yes</td>
</tr>
<tr>
<td>Housing and service programs funded through Department of Justice (DOJ) resources</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Housing and service programs funded through Health and Human Services (HHS) resources</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Housing and service programs funded through other Federal resources</td>
<td>Yes</td>
</tr>
<tr>
<td>Housing and service programs funded through state government resources</td>
<td>Yes</td>
</tr>
<tr>
<td>Housing and service programs funded through local government resources</td>
<td>Yes</td>
</tr>
<tr>
<td>Housing and service programs funded through private entities, including foundations</td>
<td>Yes</td>
</tr>
<tr>
<td>Other:(limit 50 characters)</td>
<td></td>
</tr>
</tbody>
</table>

1C-2. Describe how the CoC actively consults with Emergency Solutions Grant (ESG) recipient’s in the planning and allocation of ESG funds. Include in the response: (1) the interactions that occur between the CoC and the ESG Recipients in the planning and allocation of funds; (2) the CoCs participation in the local Consolidated Plan jurisdiction(s) process by providing Point-in-Time (PIT) and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions; and (3) how the CoC ensures local homelessness information is clearly communicated and addressed in Consolidated Plan updates. (limit 1000 characters)

The St. Louis County Department of Human Services (DHS) and the Office of Community Development (OCD) lead the development of the Consolidated Plan. Together they hold public hearings, address comments and feedback, and
evaluate program effectiveness. DHS collects data from partners on applicable ESG activities. DHS and OCD also provide PIT and HIC data for the Consolidated Plan, enabling effective planning and funding decisions for ESG. The Hearth Act requires the CoC to be active in funding decisions and selection of providers. The CoC board decides on funding priorities, which are posted for comment and feedback, prior to the posting of an RFP. The CoC Rank and Review committee ranks projects and recommends ESG recipients and funding levels. DHS is responsible for the monitoring of ESG recipients, and distributes monitoring results to the CoC board. This feedback is provided in the annual Action Plan to determine if objectives are being met and funding is used appropriately.

1C-3. CoCs must demonstrate the local efforts to address the unique needs of persons, and their families, fleeing domestic violence that includes access to housing and services that prioritizes safety and confidentiality of program participants. (limit 1000 characters)

Victim service providers are very active within the CoC. They attend CoC meetings and actively participate on a variety of CoC committees and subcommittees. Domestic Violence (DV) providers offer valuable and ongoing input on services for DV survivors. They are active in regional coordinated entry process and are established front door organizations who are also involved with the development and refinement of the CoC’s Front Door Manual. Creating a safe situation for the client and their family is critical to the CoC when determining housing options for DV victims and other agency collaboration. The confidentiality of the DV clients is maintained at the CoC level and with our HMIS provider. Organizations such as schools, employment centers, and other supportive service sites that work with DV providers are sensitive to the need for confidentiality and provide services that promote safety, empowerment, and the need for stability.

1C-3a. CoCs must describe the following: (1) how regular training is provided to CoC providers and operators of coordinated entry processes that addresses best practices in serving survivors of domestic violence; (2) how the CoC uses statistics and other available data about domestic violence, including aggregate data from comparable databases, as appropriate, to assess the scope of community needs related to domestic violence and homelessness; and (3) the CoC safety and planning protocols and how they are included in the coordinated assessment. (limit 1,000 characters)

St. Louis County DV service providers participate in the Regional CoC Service Delivery Committee to ensure that survivors, or those fleeing, are prioritized for housing. The Regional CoC Coordinated Entry (CE) process generates a priority list weekly and includes household served in DV shelters. The CE process works to ensure that individuals/families are matched with available and appropriate RRH and PSH opportunities. Processes for protecting the safety and confidentiality are in place. DV providers across our region participate specialized DV networks that work to set policies and priorities to protect DV survivors. Finally, DV shelters and transitional housing programs receive funds from fees associated with municipal court costs per a statewide
statute that augment funding for DV services across the State.

1C-4. Using the chart provided, for each of the Public Housing Agency's (PHA) in the CoC's geographic area: (1) identify the percentage of new admissions to the Public Housing or Housing Choice Voucher (HCV) Programs in the PHA’s that were homeless at the time of admission; and (2) indicate whether the PHA has a homeless admission preference in its Public Housing and/or HCV program.

Attachment Required: If the CoC selected, "Yes-Public Housing", "Yes-HCV" or "Yes-Both", attach an excerpt from the PHA(s) written policies or a letter from the PHA(s) that addresses homeless preference.

<table>
<thead>
<tr>
<th>Public Housing Agency Name</th>
<th>% New Admissions into Public Housing and Housing Choice Voucher Program during FY 2016 who were homeless at entry</th>
<th>PHA has General or Limited Homeless Preference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing Authority of St. Louis County</td>
<td>0.00%</td>
<td>No</td>
</tr>
<tr>
<td>Wellston Housing Authority</td>
<td>0.00%</td>
<td>No</td>
</tr>
<tr>
<td>Kirkwood Housing Authority</td>
<td>0.00%</td>
<td>No</td>
</tr>
</tbody>
</table>

1C-4a. For each PHA where there is not a homeless admission preference in their written policies, identify the steps the CoC has taken to encourage the PHA to adopt such a policy.

(limit 1000 characters)

St. Louis County Department of Human Services has reached out to the Housing Authority of St. Louis County (HASLC), the Wellston Housing Authority (WHA), and the Kirkwood Housing Authority (KHA). Currently none of the housing authority entities offer a preference to homeless individuals or families. Recent conversations with the HASLC, the largest PHA in our service area, have been promising as they have requested additional information to present to their executive leadership for consideration and discussion. The waiting list for HASLC is frequently closed due to limited capacity. Establishing a preference would ensure those most in need are served when the list is open. Conversations with KHA indicated that they serve a senior population which is not a primary need of our CoC. Finally, the CoC has invited all PHAs in our area to attend CoC meetings and to consider becoming CoC members.

1C-5. Describe the actions the CoC has taken to: (1) address the needs of Lesbian, Gay, Bisexual, Transgender (LGBT) individuals and their families experiencing homelessness, (2) conduct regular 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, including Gender Identity Equal Access to Housing, Fina Rule; and (3) implementation of an anti-discrimination policy.

(limit 1000 characters)
The Planning Committee, Service Delivery Committee, and the Special Population and Issues Committee collaboratively schedule annual training for CoC members and service providers to address the implementation of equal access to housing, and will work to implement the newly adopted anti-discrimination policy. Our strategies for implementing the non-discrimination policy include working with St. Louis County's Department of Human Services (DHS) to ensure that appropriate anti-discrimination policy language is included in all contracts and that the language is consistent with the CoC's policy and applicable federal, state, and local laws. Additional training addressing the needs of LGBT individuals and their families is also provided by the CoC annually.

1C-6. Criminalization: Select the specific strategies implemented by the CoC to prevent the criminalization of homelessness in the CoC's geographic area. Select all that apply.

| Engaged/educated local policymakers: | X |
| Engaged/educated law enforcement: | X |
| Engaged/educated local business leaders | |
| Implemented communitywide plans: | |
| No strategies have been implemented | |
| Other:(limit 50 characters) | |
1D. Continuum of Care (CoC) Discharge Planning

Instructions:
For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1D-1. Discharge Planning-State and Local: Select from the list provided, the systems of care the CoC coordinates with and assists in state and local discharge planning efforts to ensure those who are discharged from that system of care are not released directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply.

<table>
<thead>
<tr>
<th>System of Care</th>
<th>Option</th>
</tr>
</thead>
<tbody>
<tr>
<td>Foster Care</td>
<td>X</td>
</tr>
<tr>
<td>Health Care</td>
<td>X</td>
</tr>
<tr>
<td>Mental Health Care</td>
<td></td>
</tr>
<tr>
<td>Correctional Facilities</td>
<td>X</td>
</tr>
<tr>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

1D-1a. If the applicant did not check all the boxes in 1D-1, provide: (1) an explanation of the reason(s) the CoC does not have a discharge policy in place for the system of care; and (2) provide the actions the CoC is taking or plans to take to coordinate with or assist the State and local discharge planning efforts to ensure persons are not discharged to the street, emergency shelters, or other homeless assistance programs. (limit 1000 characters)

Not applicable, all boxes were checked.

1D-2. Discharge Planning: Select the system(s) of care within the CoC’s geographic area the CoC actively coordinates with to ensure persons who have resided in any of the institutions listed below longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply.

<table>
<thead>
<tr>
<th>System of Care</th>
<th>Option</th>
</tr>
</thead>
<tbody>
<tr>
<td>Foster Care</td>
<td>X</td>
</tr>
<tr>
<td>Health Care</td>
<td>X</td>
</tr>
</tbody>
</table>

Applicant: St. Louis County  
Project: MO-500 CoC Registration FY 2017  
COC_REG_2017_149389
<table>
<thead>
<tr>
<th>Service Type</th>
<th>Yes/No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mental Health Care</td>
<td>X</td>
</tr>
<tr>
<td>Correctional Facilities</td>
<td>X</td>
</tr>
<tr>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>
1E. Continuum of Care (CoC) Project Review, Ranking, and Selection

Instructions

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1E-1. Using the drop-down menu, select the appropriate response(s) that demonstrate the process the CoC used to rank and select project applications in the FY 2017 CoC Program Competition which included (1) the use of objective criteria; (2) at least one factor related to achieving positive housing outcomes; and (3) included a specific method for evaluating projects submitted by victim service providers.

<table>
<thead>
<tr>
<th>Attachment Required: Public posting of documentation that supports the process the CoC used to rank and select project application.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Used Objective Criteria for Review, Rating, Ranking and Section</td>
</tr>
<tr>
<td>Included at least one factor related to achieving positive housing outcomes</td>
</tr>
<tr>
<td>Included a specific method for evaluating projects submitted by victim service providers</td>
</tr>
</tbody>
</table>

1E-2. Severity of Needs and Vulnerabilities

CoCs must provide the extent the CoC considered the severity of needs and vulnerabilities experienced by program participants in their project ranking and selection process. Describe: (1) the specific vulnerabilities the CoC considered; and (2) how the CoC takes these vulnerabilities into account during the ranking and selection process. (See the CoC Application Detailed Instructions for examples of severity of needs and vulnerabilities.)

(limit 1000 characters)

The CoC reviews HUD priorities in the NOFA and uses these, in addition to local priorities to develop our RFP. In our 2017 RFP, we included a section specific to Services to High Needs Populations defined as: chronically homeless individuals and/or families; participants entering project with zero income; participants entering project with more than one disability; and, participants entering project from a place not meant for human habitation.

Our 2017 scoring rubric used by the Rank and Review Committee to evaluate both new and renewal projects, awarded points to programs serving a high needs population. Points were awarded if at least 30% of the individuals/families served met the definition of a high needs population. Additional points were awarded to programs serving 50% or more. On-going monitoring results of existing projects that serve these populations are taken...
into consideration when making decisions to reallocate existing funds within the continuum.

1E-3. Using the following checklist, select: (1) how the CoC made publicly available to potential project applicants an objective ranking and selection process that was used for all project (new and renewal) at least 2 days before the application submission deadline; and (2) all parts of the CoC Consolidated Application, the CoC Application attachments, Priority Listing that includes the reallocation forms and Project Listings that show all project applications submitted to the CoC were either accepted and ranked, or rejected and were made publicly available to project applicants, community members and key stakeholders.

Attachment Required: Documentation demonstrating the objective ranking 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. Attachments must clearly show the date the documents were publicly posted.

<table>
<thead>
<tr>
<th>Public Posting</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>CoC or other Website</td>
<td>x</td>
</tr>
<tr>
<td>Email</td>
<td>x</td>
</tr>
<tr>
<td>Mail</td>
<td></td>
</tr>
<tr>
<td>Advertising in Local Newspaper(s)</td>
<td></td>
</tr>
<tr>
<td>Advertising on Radio or Television</td>
<td></td>
</tr>
<tr>
<td>Social Media (Twitter, Facebook, etc.)</td>
<td></td>
</tr>
</tbody>
</table>

1E-4. Reallocation: Applicants must demonstrate the ability to reallocate lower performing projects to create new, higher performing projects. CoC’s may choose from one of the following two options below to answer this question. You do not need to provide an answer for both.

Option 1: The CoC actively encourages new and existing providers to apply for new projects through reallocation.
Attachment Required - Option 1: Documentation that shows the CoC actively encouraged new and existing providers to apply for new projects through reallocation.

Option 2: The CoC has cumulatively reallocated at least 20 percent of the CoC’s ARD between FY 2013 and FY 2017 CoC Program Competitions.
No Attachment Required - HUD will calculate the cumulative amount based on the CoCs reallocation forms submitted with each fiscal years Priority Listing.
Reallocation: Option 1

Attachment Required - provide documentation that shows the CoC actively encouraged new and existing providers to apply for new projects through reallocation.

1E-5. If the CoC rejected or reduced project application(s), enter the date the CoC and Collaborative Applicant notified project applicants their project application(s) were being rejected or reduced in writing outside of e-snaps.

Attachment Required: Copies of the written notification to project applicant(s) that their project application(s) were rejected. Where a project application is being rejected or reduced, the CoC must indicate the reason(s) for the rejection or reduction.

1E-5a. Provide the date the CoC notified applicant(s) their application(s) were accepted and ranked on the Priority Listing, in writing, outside of e-snaps.

Attachment Required: Copies of the written notification to project applicant(s) their project application(s) were accepted and ranked on the Priority listing.
## Reallocation Supporting Documentation

Attachment Required - provide documentation that shows the CoC actively encouraged new and existing providers to apply for new projects through reallocation.

<table>
<thead>
<tr>
<th>Document Type</th>
<th>Required?</th>
<th>Document Description</th>
<th>Date Attached</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reallocation Supporting Documentation</td>
<td>No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Attachment Details

Document Description:
2A. Homeless Management Information System (HMIS) Implementation

Instructions:
For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2A-1. Does the 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?
Yes

Attachment Required: If “Yes” is selected, a copy of the sections of the Governance Charter, or MOU/MOA addressing the roles and responsibilities of the CoC and HMIS Lead.

2A-1a. 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. In addition, indicate if the page number applies to the Governance Charter or MOU/MOA.
Page 1 contains Roles and Responsibilities for the CoC and HMIS Lead

Yes

2A-3. What is the name of the HMIS software vendor?
Municipal Information Systems, Inc.

2A-4. Using the drop-down boxes, select the HMIS implementation Coverage area.
Regional (multiple CoC)

2A-5. Per the 2017 HIC use the following chart to indicate the number of beds in the 2017 HIC and in HMIS for each project type within the CoC. If a particular project type does not exist in the CoC then enter "0" for all cells
Emergency Shelter (ESG) beds

<table>
<thead>
<tr>
<th>Project Type</th>
<th>Total Beds in 2017 HIC</th>
<th>Total Beds in HIC Dedicated for DV</th>
<th>Total Beds in HMIS</th>
<th>HMIS Bed Coverage Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Shelter (ESG) beds</td>
<td>201</td>
<td>59</td>
<td>120</td>
<td>84.51%</td>
</tr>
<tr>
<td>Safe Haven (SH) beds</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Transitional Housing (TH) beds</td>
<td>210</td>
<td>0</td>
<td>96</td>
<td>45.71%</td>
</tr>
<tr>
<td>Rapid Re-Housing (RRH) beds</td>
<td>156</td>
<td>0</td>
<td>156</td>
<td>100.00%</td>
</tr>
<tr>
<td>Permanent Supportive Housing (PSH) beds</td>
<td>363</td>
<td>304</td>
<td>83.75%</td>
<td></td>
</tr>
<tr>
<td>Other Permanent Housing (OPH) beds</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

2A-5a. To receive partial credit, if the bed coverage rate is below 85 percent for any of the project types, the CoC must provide clear steps on how it intends to increase this percentage for each project type over the next 12 months. (limit 1000 characters)

The transitional housing bed coverage rate is impacted by 5 youth programs that do not participate in HMIS, 3 of which were new on the HIC this year. The emergency shelter bed coverage rate is slightly below 85% due to a voucher bed program for clients with HIV and an emergency shelter for youth choosing not to participate in HMIS, which are new on the HIC this year. The CoC has been focused on increasing outreach to these agencies. The CoC has met with these youth TH agencies to discuss further CoC involvement, including expanding the use of HMIS to the non-participating projects. The PSH bed coverage rate is below 85% due to a program for veteran families that receives no funding from the VA being added to the 2017 HIC. This agency has been involved in conversations with the CoC regarding HMIS participation for the purposes of Coordinated Entry participation.

2A-6. Annual Housing Assessment Report (AHAR) Submission: How many Annual Housing Assessment Report (AHAR) tables were accepted and used in the 2016 AHAR?

12

2A-7. Enter the date the CoC submitted the 2017 Housing Inventory Count (HIC) data into the Homelessness Data Exchange (HDX). (mm/dd/yyyy)

05/01/2017
2B. Continuum of Care (CoC) Point-in-Time Count

Instructions:
For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2B-1. Indicate the date of the CoC's 2017 PIT count (mm/dd/yyyy). If the PIT count was conducted outside the last 10 days of January 2017, HUD will verify the CoC received a HUD-approved exception.

01/25/2017

2B-2. Enter the date the CoC submitted the PIT count data in HDX. (mm/dd/yyyy)

04/28/2017
2C. Continuum of Care (CoC) Point-in-Time (PIT) Count: Methodologies

Instructions:
For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2C-1. Describe any change in the CoC’s sheltered PIT count implementation, including methodology and data quality changes from 2016 to 2017. Specifically, how those changes impacted the CoCs sheltered PIT count results. (limit 1000 characters)

The 2016 sheltered PIT count was done using paper surveys collected from HMIS participating agencies and the DV agencies. For 2017, all agencies again completed paper surveys. In addition, the surveys from HMIS participating agencies were then validated against HMIS data. If discrepancies between the paper form and the HMIS report occurred, both forms were returned to the agency. Agencies were required to correct the data and report back accurate numbers.

This two-step validation process led to more accurate PIT numbers for 2017. After all data was validated by agencies, the HMIS lead compiled all PIT and HIC data into a single data base. The sheltered PIT data was aggregated from the single database per HUD data submission guidance and entered into HDX.

2C-2. Did your CoC change its provider coverage in the 2017 sheltered count? Yes

2C-2a. If “Yes” was selected in 2C-2, enter the change in provider coverage in the 2017 sheltered PIT count, including the number of beds added or removed due to the change.

<table>
<thead>
<tr>
<th>Beds Added:</th>
<th>211</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beds Removed:</td>
<td>145</td>
</tr>
<tr>
<td>Total:</td>
<td>66</td>
</tr>
</tbody>
</table>

2C-3. 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 2017 sheltered PIT count? No
2C-3a. If "Yes" was selected in 2C-3, enter the number of beds that were added or removed in 2017 because of a Presidentially declared disaster.

| Beds Added: | 0 |
| Beds Removed: | 0 |
| Total: | 0 |

2C-4. Did the CoC change its unsheltered PIT count implementation, including methodology and data quality changes from 2016 to 2017? Yes

CoCs that did not conduct an unsheltered count in 2016 or did not report unsheltered PIT count data to HUD in 2016 should compare their efforts in 2017 to their efforts in 2015.

2C-4a. Describe any change in the CoC’s unsheltered PIT count implementation, including methodology and data quality changes from 2016 to 2017. Specify how those changes impacted the CoC’s unsheltered PIT count results. See Detailed Instructions for more information. (limit 1000 characters)

In 2016 the CoC made the decision to focus the PIT Count predominately on North St. Louis County, in areas where the homeless were known to gather, due to limited resources. In 2017 the CoC developed additional volunteer resources which allowed for a better count effort. Specifically in 2017 St. Louis County was divided into nineteen (19) geographic regions. On the day of the street count, homeless professionals, trained outreach teams and experienced volunteers canvased hotspots within their assigned regions. “Hotspots” included, but were not limited to, hospital emergency rooms, lunch sites, warming centers, riverfront encampments, drop-in centers, parks, laundromats, libraries and other public places. Many of these locations were identified by the homeless community, law enforcement from the different municipalities and the St. Louis County Continuum of Care Point In Time and Special Population and Issues Committees.

2C-5. Did the CoC implement specific measures to identify youth in their PIT count? Yes

2C-5a. If "Yes" was selected in 2C-5, describe the specific measures the CoC; (1) took to identify homeless youth in the PIT count; (2) during the planning process, how stakeholders that serve homeless youth were engaged; (3) how homeless youth were engaged/involved; and (4) how the CoC worked with stakeholders to select locations where homeless youth are most likely to be identified. (limit 1000 characters)

The CoC worked with the HMIS lead agency to identify all emergency shelters and transitional housing agencies serving homeless youth in the community.
The HMIS lead agency contacted each of these agencies to determine whether the clients they serve should be included in the PIT Count. If it was determined that the youth they serve should be included in the PIT count, they were asked to complete the project level PIT form. For the unsheltered count, youth were engaged to help identify likely "hot spots" for surveyors to visit. Youth assisted in the development of a special survey tool for use during the PIT count. Also, area school districts completed survey forms for children known to be homeless. These forms were cross referenced against other information to avoid duplication.

2C-6. Describe any actions the CoC implemented in its 2017 PIT count to better count individuals and families experiencing chronic homelessness, families with children, and Veterans experiencing homelessness. (limit 1000 characters)

The CoC worked closely with the HMIS lead agency to identify all agencies that serve persons who should be included in the PIT count. This collaboration identified new agencies to be included in the PIT count this year. The HMIS lead agency worked closely with those agencies to obtain accurate PIT numbers, including comparing the data to the HMIS where applicable. This resulted in a more accurate count of persons experiencing chronic homelessness, families with children, and veterans. These efforts, when combined with our improved process for covering the entire 523 square miles in St. Louis County, significantly improved our PIT count.
3A. Continuum of Care (CoC) System Performance

Instructions
For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

3A-1. Performance Measure: Reduction in the Number of First-Time Homeless. Describe: (1) the numerical change the CoC experienced; (2) the process the CoC used to identify risk factors of becoming homeless for the first time; (3) the strategies in place to address individuals and families at risk of becoming homeless; and (4) the organization or position that is responsible for overseeing the CoC’s strategy to reduce or end the number of individuals and families experiencing homelessness for the first time.
(limit 1000 characters)

The data indicates the number of first time homeless in non-permanent housing increased by 11% between 2015 and 2016, and by 15% when including permanent housing. The increase is due to better bed coverage rates which results in a larger universe of people, many of them first time homeless.

To identify specific risk factors contributing to homelessness, shelter residents were asked to identify factors leading to their shelter stay. Respondents indicated high utility debt was their most critical issue. This led to a strategic decision to allocate a larger portion of ESG funds to prevention activities. The CoC’s Coordinated Entry system, using a screening tool designed to identify those at high risk for homelessness, is focusing on identifying those most in need of prevention and diversion assistance and making warm referrals to providers who can provide assistance.

The CoC’s Planning Committee is responsible for overseeing the strategy for the CoC.

3A-2. Performance Measure: Length-of-Time Homeless. CoC’s must demonstrate how they reduce the length-of-time for individuals and families remaining homeless. Describe (1) the numerical change the CoC experienced; (2) the actions the CoC has implemented to reduce the length-of-time individuals and families remain homeless; (3) how the CoC identifies and houses individuals and families with the longest length-of-time homeless; and (4) identify the organization or position that is responsible for overseeing the CoC’s strategy to reduce the length-of-time individuals and families remain homeless.
(limit 1000 characters)

The number of persons homeless in the CoC increased by 14% in 2016, however, the increase in the length of time people were homeless was only 5
days. To reduce length of time homeless, the CoC reviewed the policies and procedures of providers to ensure the focus of case management was to move participants to permanent housing. Emergency shelter and transitional housing providers are helping participants develop housing plans and connecting them with resources to stabilize their housing situation. The CoC is streamlining the coordinated entry process; identifying bottlenecks and inefficiencies to ensure the process rapidly moves people to stable housing. CE prioritizes persons who are homeless the longest and are the most in need of service. These strategies are working. Data for FY 2017 shows a decrease in length of time homeless, from 56 to 40 days for ES and SH, and from 98 to 70 days for ES, SH, and TH. The CoC Planning Committee is responsible for overseeing this strategy.

3A-3. Performance Measures: Successful Permanent Housing Placement and Retention
Describe: (1) the numerical change the CoC experienced; (2) the CoCs strategy to increase the rate of which individuals and families move to permanent housing destination or retain permanent housing; and (3) the organization or position responsible for overseeing the CoC’s strategy for retention of, or placement in permanent housing.
(limit 1000 characters)
The CoC’s strategy to increase positive transitions and PH retention rates focuses on the following: 1. Encourage providers ensure lease/participation agreements don’t penalize individuals not involved in services or fail to stay sober. 2. Enhance case manager training to increase their ability to work with clients to address behaviors jeopardizing housing. 3. Explore the feasibility of establishing a fund to pay security deposits and reimburses landlords when CoC clients cause damage to their units. The goal is to increase landlords’ willingness to house and retain homeless tenants. 4. Work with a local technology firm to develop an affordable housing website providing landlords a free platform to list properties available for rent. These strategies are working. Data for FY 2017 shows exits to/retention of PH increased by 3%.

The CoC Planning Committee is responsible for overseeing the strategy.

Describe: (1) the numerical change the CoC experienced, (2) what strategies the CoC implemented to identify individuals and families who return to homelessness, (3) the strategies the CoC will use to reduce additional returns to homelessness, and (4) the organization or position responsible for overseeing the CoC’s efforts to reduce the rate of individuals and families’ returns to homelessness.
(limit 1000 characters)
Total returns to homelessness dropped to 7% in 2016 from 11% in 2015. However, the rate increased by 13% for TH and by 2% for PH. The CoC’s strategy to address this issue is two-fold. 1. An “Acuity Review Panel” is being established that will work with clients who are involuntarily terminated from a housing program. This focused intervention is intended to engage the client in the most appropriate services and prevent a return to homelessness.
2. A more diverse training curriculum is being developed for case managers within the CoC. Some of the topics include: motivational interviewing, SOAR, landlord-tenant law, and use of the SPDAT/VI-SPDAT

The CoC Planning Committee is responsible for overseeing the strategy.

3A-5. Performance Measures: Job and Income Growth
Describe: (1) the strategies that have been implemented to increase access to employment and mainstream benefits; (2) how the CoC program-funded projects have been assisted to implement the strategies; (3) how the CoC is working with mainstream employment organizations to help individuals and families increase their cash income; and (4) the organization or position that is responsible for overseeing the CoC's strategy to increase job and income growth from employment, non-employment including mainstream benefits.
(limit 1000 characters)

The percentage of system stayers with earned income was the same for 2016 compared to 2015. The percent with total income declined by 4%. System leavers with earned income and increased total income declined by 9%.

To help clients gain income the strategy is to strengthen case management capabilities. Providers are using job training classes, resume writing, and mock interviewing sessions to support clients in their job search efforts. The CoC has relationships with employment agencies who assist in matching clients to job openings. These strategies are working. Data for FY 2017 shows earned income for system leavers increased by 12%. To increase non-employment income, Case managers are screening participants to verify they receive all non-employment benefits for which they are eligible. If a client is not receiving a benefit, staff assist the individual with the process of applying for the income.

The CoC Planning Committee is responsible for overseeing the strategy.

3A-6. Did the CoC completely exclude a geographic area from the most recent PIT count (i.e. no one counted there, and for communities using samples in the area that was excluded from both the sample and extrapolation) where the CoC determined there were no unsheltered homeless people, including areas that are uninhabitable (deserts, forests).

No

3A.6a. If the response to 3A-6 was “Yes”, what was the criteria and decision-making process the CoC used to identify and exclude specific geographic areas from the CoCs unsheltered PIT count? (limit 1000 characters)

Not applicable, as the answer to the above question was no.
3A-7. Enter the date the CoC submitted the System Performance Measures data in HDX, which included the data quality section for FY 2016. (mm/dd/yyyy)

06/05/2017
3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Instructions
For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

3B-1. Compare the total number of PSH beds, CoC program and non CoC-program funded, that were identified as dedicated for yes by chronically homeless persons in the 2017 HIC, as compared to those identified in the 2016 HIC.

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homelessness persons identified on the HIC.</td>
<td>104</td>
<td>37</td>
<td>-67</td>
</tr>
</tbody>
</table>

3B-1.1. In the box below: (1) "total number of Dedicated PLUS Beds" provide the total number of beds in the Project Allocation(s) that are designated as Dedicated PLUS beds; and (2) in the box below "total number of beds dedicated to the chronically homeless:" provide the total number of beds in the Project Application(s) that are designated for the chronically homeless. This does not include those that were identified in (1) above as Dedicated PLUS Beds.

| Total number of beds dedicated as Dedicated Plus |                  |
| Total number of beds dedicated to individuals and families experiencing chronic homelessness |                  |
| Total | 0 |

3B-1.2. Did the CoC adopt the Orders of Priority into their 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. Yes

3B-2.1. Using the following chart, check each box to indicate the factor(s) the CoC currently uses to prioritize households with children based on need during the FY 2017 Fiscal Year.

| History of or Vulnerability to Victimization | X |
| Number of previous homeless episodes | X |
3B-2.2. Describe: (1) the CoCs current strategy and timeframe for rapidly rehousing every household of families with children within 30 days of becoming homeless; and (2) the organization or position responsible for overseeing the CoC’s strategy to rapidly rehouse families with children within 30 days of becoming homeless. (limit 1000 characters)

The CoC is part of a regional Coordinated Entry process which was implemented in January 2017. Implementing Coordinated Entry across the region has been complicated. Currently we have a waiting list of more than 1,300 households which makes it impossible to rehouse every household within 30 days. The CoC has been actively working with the CoCs across the region to eliminate barriers. Within our CoC we have been implementing strategies including: training for case managers; ensuring that service providers are implementing a Housing First approach to services; streamlining the Coordinated Entry process by revising the implementation manual; and reaching out to housing developers and landlords to identify new sources of affordable housing.

The CoC Executive Committee is responsible for overseeing the totality of the strategies.

3B-2.3. Compare the number of RRH units available to serve families from the 2016 and 2017 HIC.

<table>
<thead>
<tr>
<th>Number of CoC Program and non-CoC Program funded PSH units dedicated for use by chronically homelessness persons identified on the HIC.</th>
<th>2016</th>
<th>2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>29</td>
<td>47</td>
<td>18</td>
</tr>
</tbody>
</table>

3B-2.4. Describe the actions the CoC is taking to ensure emergency shelters, transitional housing, and permanent supportive housing (PSH and RRH) providers within the CoC adhere to anti-discrimination 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. (limit 1000 characters)

The CoC provides specific training for providers regarding anti-discrimination at least annually. Through the contracting and monitoring process, St. Louis County Department of Human Services (DHS) works to ensure that agencies adhere to federal anti-discrimination policies including not denying admission to,
or separating family members or caregivers based on age, sex, gender, LGBT status, marital status or disability when entering any shelter or housing program funded by DHS through federal, state, or local funds. Additionally, the CoC has recently developed and approved an anti-discrimination policy that is consistent with existing St. Louis County policies to ensure consistency of policies.

3B-2.5. From the list below, select each of the following the CoC has strategies to address the unique needs of unaccompanied homeless youth.

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Selection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Human trafficking and other forms of exploitation?</td>
<td>Yes</td>
</tr>
<tr>
<td>LGBT youth homelessness?</td>
<td>Yes</td>
</tr>
<tr>
<td>Exits from foster care into homelessness?</td>
<td>Yes</td>
</tr>
<tr>
<td>Family reunification and community engagement?</td>
<td>Yes</td>
</tr>
<tr>
<td>Positive Youth Development, Trauma Informed Care, and the use of Risk and Protective Factors in assessing youth housing and service needs?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

3B-2.6. From the list below, select each of the following the CoC has a strategy for prioritization of unaccompanied youth based on need.

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Selection</th>
</tr>
</thead>
<tbody>
<tr>
<td>History or Vulnerability to Victimization (e.g., domestic violence, sexual assault, childhood abuse)</td>
<td>X</td>
</tr>
<tr>
<td>Number of Previous Homeless Episodes</td>
<td>X</td>
</tr>
<tr>
<td>Unsheltered Homelessness</td>
<td>X</td>
</tr>
<tr>
<td>Criminal History</td>
<td>X</td>
</tr>
<tr>
<td>Bad Credit or Rental History</td>
<td>X</td>
</tr>
</tbody>
</table>

3B-2.7. Describe: (1) the strategies used by the CoC, including securing additional funding to increase the availability of housing and services for youth experiencing homelessness, especially those experiencing unsheltered homelessness; (2) provide evidence the strategies that have been implemented are effective at ending youth homelessness; (3) the measure(s) the CoC is using to calculate the effectiveness of the strategies; and (4) why the CoC believes the measure(s) used is an appropriate way to determine the effectiveness of the CoC’s efforts. (limit 1500 characters)

The CoC has actively pursued additional funding to increase the availability of housing and services for youth experiencing homeless including the Youth Homeless Demonstration Project funding opportunity. Additionally, we have partnered with youth serving organizations to develop strategies for addressing youth homelessness. Our shared strategies include: 1) Actively working with the County's Children's Service Fund (CSF) and the Department of Human Services (DHS) to encourage the prioritization of funds for shelter and outreach programming for homeless youth; 2) Working across agencies to eliminate silos to make programs available to youth, regardless of the differences in definitions.
of what constitutes a homeless youth; 3) Working with the regional CoCs to ensure that youth are included in the Coordinated Entry Process; 4) Working as a CoC to ensure that Housing First strategies work for homeless youth.; 5) Providing training on best practices for ending youth homelessness; 6) Planning, including conducting gaps analysis, to evaluate what additional efforts can be implemented; and 7) Having Runaway and Homeless Youth funded agencies participate in our HMIS to better assess youth homelessness. We are using the PIT Count and counts provided by other partners that use a differing definition of youth homelessness to support the evaluation of total youth homelessness and whether our shared strategies are having an impact.

3B-2.8. Describe: (1) How the CoC collaborates with youth education providers, including McKinney-Vento local educational authorities and school districts; (2) the formal partnerships the CoC has with these entities; and (3) the policies and procedures, if any, that have been adopted to inform individuals and families who become homeless of their eligibility for educational services. (limit 1000 characters)

There are 22 public school districts in St. Louis County as well as a County-wide Special School District. In the past several years, the CoC has worked collaboratively with school districts to implement a back to school program that supports homeless families with children. These efforts have resulted in several districts joining the CoC and others informally participating in CoC meetings (without becoming members). Currently the three school districts are formal members of the CoC. Four additional districts routinely attend CoC meetings. Other school districts reach out to CoC members to seek resources for homeless families with children and have been encouraged to attend meetings and join the CoC. Additionally, the CoC ensures that homeless service providers and youth serving organizations have up-to-date information regarding their rights and access to educational services.

3B-2.9. Does the CoC have any written formal agreements, MOU/MOAs or partnerships with one or more providers of early childhood services and supports? Select “Yes” or “No”.

<table>
<thead>
<tr>
<th>Early Childhood Providers</th>
<th>MOU/MOA</th>
<th>Other Formal Agreement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Head Start</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Early Head Start</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Child Care and Development Fund</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Federal Home Visiting Program</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Healthy Start</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Public Pre-K</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Birth to 3</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Tribal Home Visiting Program</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Other: (limit 50 characters)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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3B-3.1. Provide the actions the CoC has taken to identify, assess, and refer homeless Veterans who are eligible for Veterans Affairs services and housing to appropriate resources such as HUD-VASH and Supportive Services for Veterans Families (SSVF) program and Grant and Per Diem (GPD).

Members of the St. Louis County Continuum of Care make every effort to identify assess, and refer homeless veterans who are eligible for Veteran Affairs (VA) services and housing to appropriate resources such as the HUD-VASH and SSVF Programs. They do this through the connection the service providers have with each other and in particular with the St. Louis VA's Homeless Program at the VA Hope Recovery Center. The Hope Recovery Center completes an assessment on each Veteran to include a VI-SPADAT intake by which the veteran is then referred to the appropriate program based on their needs assessment. St. Louis County CoC is working closely with St. Louis City CoC and those of surrounding counties to use a coordinated entry system to specifically identify homeless veterans. Additionally, the County funds a hotel voucher program with ESG funds and MO Veterans Commission funding for veterans.

| 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 is assisted to quickly move into permanent housing using a Housing First approach? | No |
4A. Continuum of Care (CoC) Accessing Mainstream Benefits and Additional Policies

Instructions:
For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

4A-1. Select from the drop-down (1) each type of healthcare organization the CoC assists program participants with enrolling in health insurance, and (2) if the CoC provides assistance with the effective utilization of Medicaid and other benefits.

<table>
<thead>
<tr>
<th>Type of Health Care</th>
<th>Yes/No</th>
<th>Assist with Utilization of Benefits?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Health Care Benefits (State or Federal benefits, e.g. Medicaid, Indian Health Services)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Private Insurers:</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Non-Profit, Philanthropic:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other: (limit 50 characters)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4A-1a. Mainstream Benefits

CoC program funded projects must be able to demonstrate they supplement CoC Program funds from other public and private resources, including: (1) how the CoC works with mainstream programs that assist homeless program participants in applying for and receiving mainstream benefits; (2) how the CoC systematically keeps program staff up-to-date regarding mainstream resources available for homeless program participants (e.g. Food Stamps, SSI, TANF, substance abuse programs); and (3) identify the organization or position that is responsible for overseeing the CoCs strategy for mainstream benefits. (limit 1000 characters)

A primary focus of CoC providers working with homeless populations is adequacy of income to sustain housing and promote stability. An important element of income for many homeless individuals and families is mainstream benefits. The CoC employs several strategies to ensure service providers remain up-to-date on mainstream resources available for homeless program participants including: 1) improving training for case managers across the CoC including both members and non-members; 2) providing annual training, coordinated by the Service Delivery Committee, on a range of issues including changes in programs and policies for mainstream benefits; and 3) publicizing the availability of resources from Legal Services of Eastern MO to support families needing to appeal denied benefits. The CoC’s Service Delivery Committee is responsible for overseeing this strategy.
4A-2. Low Barrier: Based on the CoCs FY 2017 new and renewal project applications, what percentage of Permanent Housing (PSH) and Rapid Rehousing (RRH), Transitional Housing (TH), Safe-Haven, and SSO (Supportive Services Only-non-coordinated entry) projects in the CoC are low-barrier?

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of PH (PSH and RRH), TH, Safe-Haven and non-Coordinated Entry SSO project applications in the FY 2017 competition (new and renewal)</td>
<td>10.00</td>
</tr>
<tr>
<td>Total number of PH (PSH and RRH), TH, Safe-Haven and non-Coordinated Entry SSO renewal and new project applications that selected “low barrier” in the FY 2017 competition.</td>
<td>10.00</td>
</tr>
<tr>
<td>Percentage of PH (PSH and RRH), TH, Safe-Haven and non-Coordinated Entry SSO renewal and new project applications in the FY 2017 competition that will be designated as “low barrier”</td>
<td>100.00%</td>
</tr>
</tbody>
</table>

4A-3. Housing First: What percentage of CoC Program Funded PSH, RRH, SSO (non-coordinated entry), safe-haven and Transitional Housing; FY 2017 projects have adopted the Housing First approach, meaning that the project quickly houses clients without preconditions or service participation requirements?

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of PSH, RRH, non-Coordinated Entry SSO, Safe Haven and TH project applications in the FY 2017 competition (new and renewal).</td>
<td>10.00</td>
</tr>
<tr>
<td>Total number of PSH, RRH, non-Coordinated Entry SSO, Safe Haven and TH renewal and new project applications that selected Housing First in the FY 2017 competition.</td>
<td>10.00</td>
</tr>
<tr>
<td>Percentage of PSH, RRH, non-Coordinated Entry SSO, Safe Haven and TH renewal and new project applications in the FY 2017 competition that will be designated as Housing First.</td>
<td>100.00%</td>
</tr>
</tbody>
</table>

4A-4. Street Outreach: Describe (1) the CoC's outreach and if it covers 100 percent of the CoC's geographic area; (2) how often street outreach is conducted; and (3) how the CoC has tailored its street outreach to those that are least likely to request assistance. (limit 1000 characters)

Owing to a lack of resources and funding, Street Outreach services are limited to: 1) winter outreach on the coldest days to identify homeless individuals and get them into shelter; 2) Crisis intervention teams of local police departments; and 3) outreach to youth funded in a limited fashion through the CoC with additional supports provided by the County's Children's Service Fund, and ESG grant funds.

4A-5. Affirmative Outreach
Specific strategies the CoC has 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 identity, sexual orientation, age, familial status, or disability; who are least likely to apply in the absence of special outreach. Describe: (1) the specific strategies that have been implemented that affirmatively further fair housing as detailed in 24 CFR 578.93(c); and (2) what measures have been taken to provide effective communication to persons with disabilities and those with limited English proficiency. (limit 1000 characters)

Affirmatively furthering fair housing and supportive services to eligible
individuals without regard to race, color, national origin, religion, sex, gender identity, sexual orientation, age, familial status or disability, particularly among those who are least likely to apply is essential to the success of the CoC and the individuals we serve. Our strategies for addressing these issues include: 1) Annual training on equal access and fair housing issues; 2) Monitoring of funded agencies to ensure their policies comport with all federal, state and county policies regarding anti-discrimination, fair housing, and equal access; 3) Consultation with our local disability access organization, Paraquad; and 4) Ensuring that information available to homeless individuals and families is available through multiple channels and that interpretation and/or translation services are available as needed from the International Institute and other organizations serving immigrant populations.

4A-6. Compare the number of RRH beds available to serve populations from the 2016 and 2017 HIC.

<table>
<thead>
<tr>
<th>RRH beds available to serve all populations in the HIC</th>
<th>2016</th>
<th>2017</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>RRH beds available to serve all populations in the HIC</td>
<td>97</td>
<td>156</td>
<td>59</td>
</tr>
</tbody>
</table>

4A-7. Are new proposed project applications requesting $200,000 or more in funding for housing rehabilitation or new construction?  
No

4A-8. Is the CoC requesting to designate one or more SSO or TH projects to serve homeless households with children and youth defined as homeless under other Federal statues who are unstably housed (paragraph 3 of the definition of homeless found at 24 CFR 578.3).  
No
**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

<table>
<thead>
<tr>
<th>Document Type</th>
<th>Required?</th>
<th>Document Description</th>
<th>Date Attached</th>
</tr>
</thead>
<tbody>
<tr>
<td>01. 2016 CoC Consolidated Application: Evidence of the CoC's communication to rejected participants</td>
<td>Yes</td>
<td>Award Letters</td>
<td>09/27/2017</td>
</tr>
<tr>
<td>02. 2016 CoC Consolidated Application: Public Posting Evidence</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>03. CoC Rating and Review Procedure (e.g. RFP)</td>
<td>Yes</td>
<td>RFP with Rank and...</td>
<td>09/24/2017</td>
</tr>
<tr>
<td>05. CoCs Process for Reallocating</td>
<td>Yes</td>
<td>Reallocation</td>
<td>09/28/2017</td>
</tr>
<tr>
<td>06. CoC's Governance Charter</td>
<td>Yes</td>
<td>HMIS Governance C...</td>
<td>09/27/2017</td>
</tr>
<tr>
<td>07. HMIS Policy and Procedures Manual</td>
<td>Yes</td>
<td>HMIS Policy and P...</td>
<td>09/27/2017</td>
</tr>
<tr>
<td>08. Applicable Sections of Con Plan to Serving Persons Defined as Homeless Under Other Fed Statutes</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>09. PHA Administration Plan (Applicable Section(s) Only)</td>
<td>Yes</td>
<td>PHA Administration...</td>
<td>09/27/2017</td>
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<tr>
<td>10. CoC-HMIS MOU (if referenced in the CoC's Governance Charter)</td>
<td>No</td>
<td>HMIS Lead Contrac...</td>
<td>09/27/2017</td>
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<tr>
<td>11. CoC Written Standards for Order of Priority</td>
<td>No</td>
<td></td>
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<tr>
<td>12. Project List to Serve Persons Defined as Homeless under Other Federal Statutes (if applicable)</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>13. HDX-system Performance Measures</td>
<td>Yes</td>
<td>System Performance...</td>
<td>09/24/2017</td>
</tr>
<tr>
<td>14. Other</td>
<td>No</td>
<td>System Performance...</td>
<td>09/24/2017</td>
</tr>
<tr>
<td>15. Other</td>
<td>No</td>
<td></td>
<td></td>
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Attachment Details

Document Description: Award Letters

Attachment Details

Document Description:

Attachment Details

Document Description: RFP with Rank and Review Criteria

Attachment Details

Document Description: Rank and Review Criteria

Attachment Details

Document Description: Reallocation

Attachment Details

Document Description: HMIS Governance Charter
Attachment Details

Document Description: HMIS Policy and Procedures

Attachment Details

Document Description:

Attachment Details

Document Description: PHA Administration Plan

Attachment Details

Document Description: HMIS Lead Contract (MOU)

Attachment Details

Document Description:
Document Description:

Attachment Details

Document Description: System Performance Measures

Attachment Details

Document Description: System Performance Measures Data Quality

Attachment Details

Document Description: CoC Bylaws
Submission Summary

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

<table>
<thead>
<tr>
<th>Page</th>
<th>Last Updated</th>
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<tbody>
<tr>
<td>1A. Identification</td>
<td>08/24/2017</td>
</tr>
<tr>
<td>1B. Engagement</td>
<td>09/26/2017</td>
</tr>
<tr>
<td>1C. Coordination</td>
<td>09/28/2017</td>
</tr>
<tr>
<td>1D. Discharge Planning</td>
<td>08/29/2017</td>
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<tr>
<td>1E. Project Review</td>
<td>09/28/2017</td>
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<td>1F. Reallocation Supporting Documentation</td>
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<td>2A. HMIS Implementation</td>
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<td>2B. PIT Count</td>
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<tr>
<td>2C. Sheltered Data - Methods</td>
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<tr>
<td>3A. System Performance</td>
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<td>3B. Performance and Strategic Planning</td>
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<tr>
<td><strong>4A. Mainstream Benefits and Additional Policies</strong></td>
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<td>--------------------------------------------------</td>
<td>-----------------</td>
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<tr>
<td><strong>4B. Attachments</strong></td>
<td>Please Complete</td>
</tr>
<tr>
<td><strong>Submission Summary</strong></td>
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NOTICE OF FINAL RANKING FOR HUD FISCAL YEAR (FY) 2017 CONTINUUM OF CARE PROGRAM APPLICATION

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The final ranking of projects in response to the FY2017 NOFA is as follows:

<table>
<thead>
<tr>
<th>Rank</th>
<th>Agency/Project Name</th>
<th>Project Status</th>
<th>Service Type</th>
<th>Requested Amount (on Summary Sheet)</th>
<th>Grant Inventory Worksheet (GIW)</th>
<th>Final Amount</th>
<th>Difference</th>
<th>Tier</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>DMH SZN</td>
<td>Renewal</td>
<td>PSH</td>
<td>$92,880</td>
<td>$99,382</td>
<td>$99,382</td>
<td>$6,502</td>
<td>Tier 1</td>
</tr>
<tr>
<td>2</td>
<td>DMH SZF</td>
<td>Renewal</td>
<td>PSH</td>
<td>$116,100</td>
<td>$124,076</td>
<td>$124,076</td>
<td>$7,976</td>
<td>Tier 1</td>
</tr>
<tr>
<td>3</td>
<td>DMH SZA</td>
<td>Renewal</td>
<td>PSH</td>
<td>$108,360</td>
<td>$115,780</td>
<td>$115,780</td>
<td>$7,420</td>
<td>Tier 1</td>
</tr>
<tr>
<td>4</td>
<td>DMH SZQ</td>
<td>Renewal</td>
<td>PSH</td>
<td>$264,732</td>
<td>$283,263</td>
<td>$283,263</td>
<td>$18,531</td>
<td>Tier 1</td>
</tr>
<tr>
<td>5</td>
<td>DMH SZL</td>
<td>Renewal</td>
<td>PSH</td>
<td>$91,459</td>
<td>$93,783</td>
<td>$91,459</td>
<td>-2,324</td>
<td>Tier 1</td>
</tr>
<tr>
<td>6</td>
<td>DMH SZE</td>
<td>Renewal</td>
<td>PSH</td>
<td>$218,124</td>
<td>$232,974</td>
<td>$232,974</td>
<td>$14,850</td>
<td>Tier 1</td>
</tr>
<tr>
<td>7</td>
<td>Salvation Army</td>
<td>Renewal</td>
<td>PSH</td>
<td>$279,876</td>
<td>$314,908</td>
<td>$279,876</td>
<td>-$35,032</td>
<td>Tier 1</td>
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<tr>
<td>8</td>
<td>Employment Connection</td>
<td>Renewal</td>
<td>PSH</td>
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<td>Tier 1</td>
</tr>
<tr>
<td>9</td>
<td>Youth in Need</td>
<td>Renewal</td>
<td>CE</td>
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<td>$16,189</td>
<td>$16,189</td>
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<tr>
<td>10</td>
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<td>$244,001</td>
<td>$244,001</td>
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<td>Tier 1($198,406) Tier 2($45,595)</td>
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</table>

Total  $1,718,777 $1,838,788 $1,774,056
<table>
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<tr>
<th>Rank</th>
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<tr>
<td>11</td>
<td>Youth in Need</td>
<td>New</td>
<td>TH/RRH</td>
<td>$71,360</td>
<td>N/A</td>
<td>$64,732</td>
<td>-$10,000</td>
<td>Tier 2</td>
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<tr>
<td>12</td>
<td>Employment Connection</td>
<td>New</td>
<td>RRH</td>
<td>$226,628</td>
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<td>$201,033</td>
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<tr>
<td>13</td>
<td>Every Child's Hope</td>
<td>New</td>
<td>RRH</td>
<td>$175,698</td>
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<td>$146,743</td>
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<td>N/A</td>
<td><strong>$412,508</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The above noted ranking and funding decisions were finalized after careful consideration of Department of Mental Health’s performance measures and fund utilization. The funding noted above aligns with CoC priorities while ensuring the Saint Louis County CoC remains competitive.

Sincerely,

Andrea Jackson Jennings
Director, Department of Human Services

Enclosure

cc: Tom Fee
   Director, Family and Community Services

Chaunceia Mayfield,
Program Manager, Homeless Services Program
September 25, 2017

Youth In Need
1815 Boone’s Lick Road
St. Charles, MO 63301
ATTN: Colleen Condren, Regional Director

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<td>5</td>
<td>DMH SZL</td>
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<td>PSH</td>
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<td>DMH SZE</td>
<td>Renewal</td>
<td>PSH</td>
<td>$218,124</td>
<td>$232,974</td>
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</thead>
<tbody>
<tr>
<td>11</td>
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<td>TH/RRH</td>
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</tr>
</tbody>
</table>

| Total | $473,686 | N/A | $412,508 |

The above noted ranking and funding decisions were finalized after careful consideration of the Youth In Need’s proposal. A $10,000 reduction in funding was based on funding availability pursuant to CoC priorities while ensuring the Saint Louis County CoC remains competitive.

Sincerely,

Andrea Jackson Jennings
Director, Department of Human Services

Enclosure

cc: Tom Fee
Director, Family and Community Services

Chaunceia Mayfield,
Program Manager, Homeless Services Program
September 25, 2017

Department of Mental Health
1706 East Elm Street
P.O. BOX 687
Jefferson City, MO 65102
ATTN: Liz Hager-Mace, Housing Director

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<td>-$35,032</td>
<td>Tier 1</td>
</tr>
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<td>8</td>
<td>Employment Connection</td>
<td>Renewal</td>
<td>PSH</td>
<td>$287,056</td>
<td>$314,432</td>
<td>$287,056</td>
<td>-$27,376</td>
<td>Tier 1</td>
</tr>
<tr>
<td>9</td>
<td>Youth in Need</td>
<td>Renewal</td>
<td>CE</td>
<td>$16,189</td>
<td>$16,189</td>
<td>$16,189</td>
<td>$0</td>
<td>Tier 1</td>
</tr>
<tr>
<td>10</td>
<td>Epworth</td>
<td>Renewal</td>
<td>TH</td>
<td>$244,001</td>
<td>$244,001</td>
<td>$244,001</td>
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</tr>
<tr>
<td></td>
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<td><strong>Total</strong></td>
<td><strong>$1,718,777</strong></td>
<td><strong>$1,838,788</strong></td>
<td><strong>$1,774,056</strong></td>
<td></td>
</tr>
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9666 Olive Blvd, Suite 510 • Saint Louis, MO 63132 • PH 314/615-4453 • FAX 314/615-4420
Relay MO 800-735-2966
Web http://www.stlouisco.com
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</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>Youth in Need</td>
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<td>$71,560</td>
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<tr>
<td>12</td>
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<td>$226,628</td>
<td>N/A</td>
<td>$201,033</td>
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<tr>
<td>13</td>
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<td>RRH</td>
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<td>$146,743</td>
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<td>PH Bonus</td>
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<td><strong>Total</strong></td>
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<td><strong>$412,508</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
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The above noted ranking and funding decisions were finalized after careful consideration of Department of Mental Health’s performance measures and fund utilization. The funding noted above aligns with CoC priorities while ensuring the Saint Louis County CoC remains competitive.

Sincerely,

[Signature]

Andrea Jackson Jennings  
Director, Department of Human Services

Enclosure

cc: Tom Fee  
   Director, Family and Community Services

   Chaunceia Mayfield,  
   Program Manager, Homeless Services Program
September 25, 2017

Department of Mental Health
1706 East Elm Street
P.O. BOX 687
Jefferson City, MO 65102
ATTN: Liz Hager-Mace, Housing Director

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<tbody>
<tr>
<td>1</td>
<td>DMH SZN</td>
<td>Renewal</td>
<td>PSH</td>
<td>$92,880</td>
<td>$99,382</td>
<td>$99,382</td>
<td>$6,502</td>
<td>Tier 1</td>
</tr>
<tr>
<td>2</td>
<td>DMH SZP</td>
<td>Renewal</td>
<td>PSH</td>
<td>$116,100</td>
<td>$124,076</td>
<td>$124,076</td>
<td>$7,976</td>
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</tr>
<tr>
<td>3</td>
<td>DMH SZA</td>
<td>Renewal</td>
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<td>$115,780</td>
<td>$115,780</td>
<td>$7,420</td>
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</tr>
<tr>
<td>4</td>
<td>DMH SZQ</td>
<td>Renewal</td>
<td>PSH</td>
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<td>$283,263</td>
<td>$283,263</td>
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</tr>
<tr>
<td>5</td>
<td>DMH SZL</td>
<td>Renewal</td>
<td>PSH</td>
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<td>$93,783</td>
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<td>Tier 1</td>
</tr>
<tr>
<td>6</td>
<td>DMH SZE</td>
<td>Renewal</td>
<td>PSH</td>
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<td>$232,974</td>
<td>$232,974</td>
<td>$14,850</td>
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</tr>
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<td>7</td>
<td>Salvation Army</td>
<td>Renewal</td>
<td>PSH</td>
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<td>CE</td>
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<td>$16,189</td>
<td>$0</td>
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<td>10</td>
<td>Epworth</td>
<td>Renewal</td>
<td>TH</td>
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<td>$244,001</td>
<td>$244,001</td>
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<td>Tier 2 ($198,406)</td>
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Total $1,718,777 $1,838,788 $1,774,056
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<td>New</td>
<td>RRH</td>
<td>$175,698</td>
<td>N/A</td>
<td>$146,743</td>
<td>-$25,583</td>
<td>PH Bonus</td>
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<tr>
<td></td>
<td>Total</td>
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<td></td>
<td>$473,686</td>
<td>N/A</td>
<td>$412,508</td>
<td></td>
<td></td>
</tr>
</tbody>
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Sincerely,

[Signature]

Andrea Jackson Jennings
Director, Department of Human Services

Enclosure

cc: Tom Fee
    Director, Family and Community Services

    Chaunceia Mayfield,
    Program Manager, Homeless Services Program
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<td>PSH</td>
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<td>DMH SZF</td>
<td>Renewal</td>
<td>PSH</td>
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<td>PSH</td>
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<td>$115,780</td>
<td>$115,780</td>
<td>$7,420</td>
<td>Tier 1</td>
</tr>
<tr>
<td>4</td>
<td>DMH SZQ</td>
<td>Renewal</td>
<td>PSH</td>
<td>$264,732</td>
<td>$283,263</td>
<td>$283,263</td>
<td>$18,531</td>
<td>Tier 1</td>
</tr>
<tr>
<td>5</td>
<td>DMH SZL</td>
<td>Renewal</td>
<td>PSH</td>
<td>$91,459</td>
<td>$93,783</td>
<td>$91,459</td>
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<td>Tier 1</td>
</tr>
<tr>
<td>6</td>
<td>DMH SZE</td>
<td>Renewal</td>
<td>PSH</td>
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<td>CE</td>
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<td>$0</td>
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<tr>
<td>10</td>
<td>Epworth</td>
<td>Renewal</td>
<td>TH</td>
<td>$244,001</td>
<td>$244,001</td>
<td>$244,001</td>
<td>$0</td>
<td>Tier 1</td>
</tr>
</tbody>
</table>

Total: $1,718,777 / $1,838,788 / $1,774,056
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<td>N/A</td>
<td>$64,732</td>
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<td>12</td>
<td>Employment Connection</td>
<td>New</td>
<td>RRH</td>
<td>$226,628</td>
<td>N/A</td>
<td>$201,033</td>
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</tr>
<tr>
<td>13</td>
<td>Every Child's Hope</td>
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<tr>
<td></td>
<td>Total</td>
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<td>$473,686</td>
<td>N/A</td>
<td>$412,508</td>
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<td></td>
</tr>
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</table>

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Sincerely,

Andrea Jackson Jennings  
Director, Department of Human Services

Enclosure

cc: Tom Fee  
Director, Family and Community Services

Chaunceia Mayfield,  
Program Manager, Homeless Services Program
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<td>Renewal</td>
<td>TH</td>
<td>$244,001</td>
<td>$244,001</td>
<td>$244,001</td>
<td>$0</td>
<td>Tier 1, Tier 2 ($198,406, $45,595)</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
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<td></td>
<td><strong>$1,718,777</strong></td>
<td><strong>$1,838,788</strong></td>
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September 25, 2017

Department of Mental Health
1706 East Elm Street
P.O. BOX 687
Jefferson City, MO 65102
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The above noted ranking and funding decisions were finalized after careful consideration of Department of Mental Health’s performance measures and fund utilization. The funding noted above aligns with CoC priorities while ensuring the Saint Louis County CoC remains competitive.

Sincerely,

[Signature]

Andrea Jackson Jennings
Director, Department of Human Services

Enclosure

cc: Tom Fee
    Director, Family and Community Services

    Chauceia Mayfield,
    Program Manager, Homeless Services Program
September 25, 2017

Employment Connection
2838 Market St.
St. Louis, MO 63103
ATTN: Brenda Mahr

NOTICE OF FINAL RANKING FOR HUD FISCAL YEAR (FY) 2017 CONTINUUM OF CARE PROGRAM APPLICATION

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The above noted ranking and funding decisions were finalized after careful consideration of Employment Connection’s performance measures and fund utilization. A $27,376 reduction in funding aligns with fund utilization of the Project Homecoming program while ensuring the Saint Louis County CoC remains competitive.

Sincerely,

Andrea Jackson Jennings
Director, Department of Human Services

Enclosure

cc: Tom Fee
    Director, Family and Community Services

Chaunceia Mayfield,
Program Manager, Homeless Services Program
September 25, 2017

Employment Connection
2838 Market St.
St. Louis, MO 63103
ATTN: Brenda Mahr, CEO

NOTICE OF FINAL RANKING FOR HUD FISCAL YEAR (FY) 2017 CONTINUUM OF CARE PROGRAM APPLICATION

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Total | $1,718,777 | $1,838,788 | $1,774,056 |
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Sincerely,

Andrea Jackson Jennings
Director, Department of Human Services

Enclosure

cc: Tom Fee
    Director, Family and Community Services

    Chaunceia Mayfield,
    Program Manager, Homeless Services Program
September 25, 2017

The Salvation Army Midland Division
P.O. Box 21787
St. Louis, MO 63109-0787
ATTN: Gary Busiek

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The above noted ranking and funding decisions were finalized after careful consideration of Salvation Army’s performance measures and fund utilization. A $35,032 reduction in funding aligns with fund utilization of the Homes of Hope program while ensuring the Saint Louis County CoC remains competitive.

Sincerely,

Andrea Jackson Jennings
Director, Department of Human Services

Enclosure

cc: Tom Fee
   Director, Family and Children Services

   Chaunceia Mayfield,
   Program Manager, Homeless Services Program
Saint Louis COUNTY
HUMAN SERVICES

September 25, 2017

Every Child’s Hope
8240 St. Charles Rock Rd.
St. Louis, MO 63114
ATTN: Mr. Michael Brennan, CEO

NOTICE OF FINAL RANKING FOR HUD FISCAL YEAR (FY) 2017 CONTINUUM OF CARE PROGRAM APPLICATION

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The final ranking of projects in response to the FY2017 NOFA is as follows:

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<td>DMH SZN</td>
<td>Renewal</td>
<td>PSH</td>
<td>$92,880</td>
<td>$99,382</td>
<td>$6,502</td>
<td>Tier 1</td>
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<td>2</td>
<td>DMH SZF</td>
<td>Renewal</td>
<td>PSH</td>
<td>$116,100</td>
<td>$124,076</td>
<td>$7,976</td>
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</tr>
<tr>
<td>3</td>
<td>DMH SZA</td>
<td>Renewal</td>
<td>PSH</td>
<td>$108,360</td>
<td>$115,780</td>
<td>$7,420</td>
<td>Tier 1</td>
</tr>
<tr>
<td>4</td>
<td>DMH SZQ</td>
<td>Renewal</td>
<td>PSH</td>
<td>$264,732</td>
<td>$283,263</td>
<td>$18,531</td>
<td>Tier 1</td>
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<td>5</td>
<td>DMH SZL</td>
<td>Renewal</td>
<td>PSH</td>
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<td>$91,459</td>
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</tr>
<tr>
<td>6</td>
<td>DMH SZE</td>
<td>Renewal</td>
<td>PSH</td>
<td>$218,124</td>
<td>$232,974</td>
<td>$14,850</td>
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<tr>
<td>7</td>
<td>Salvation Army</td>
<td>Renewal</td>
<td>PSH</td>
<td>$279,876</td>
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<td>8</td>
<td>Employment Connection</td>
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<td>PSH</td>
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<td>Tier 1</td>
</tr>
<tr>
<td>9</td>
<td>Youth in Need</td>
<td>Renewal</td>
<td>CE</td>
<td>$16,189</td>
<td>$16,189</td>
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<td>Tier 1</td>
</tr>
<tr>
<td>10</td>
<td>Epworth</td>
<td>Renewal</td>
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<td>$244,001</td>
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<td></td>
<td></td>
<td><strong>Total</strong></td>
<td><strong>$1,718,777</strong></td>
<td><strong>$1,774,056</strong></td>
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9666 Olive Blvd, Suite 610 • Saint Louis, MO 63132 • PH 314/615-4453 • FAX 314/615-4420
Relay MO 800-735-2986
Web http://www.stlouisco.com
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<td>$64,732</td>
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<tr>
<td>12</td>
<td>Employment Connection</td>
<td>New</td>
<td>RRH</td>
<td>$226,628</td>
<td>N/A</td>
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<td></td>
<td><strong>$473,686</strong></td>
<td><strong>N/A</strong></td>
<td><strong>$412,508</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The above noted ranking and funding decisions were finalized after careful consideration of Every Child’s Hope’s proposal. A $25,583 reduction in funding was based on funding availability pursuant to CoC priorities while ensuring the Saint Louis County CoC remains competitive.

Sincerely,

Andrea Jackson Jennings  
Director, Department of Human Services

Enclosure

cc: Tom Fee  
Director, Family and Community Services  

Chaunceia Mayfield,  
Program Manager, Homeless Services Program
September 25, 2017

Epworth Children and Family Services
110 N. Elm Ave.
Webster Groves, MO 63119
ATTN: Michelle Meier, Senior Program Director

NOTICE OF FINAL RANKING FOR HUD FISCAL YEAR (FY) 2017 CONTINUUM OF CARE PROGRAM APPLICATION

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<td>PSH</td>
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<td>DMH SXL</td>
<td>Renewal</td>
<td>PSH</td>
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<td>$2,324</td>
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<td>$0</td>
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| Total | $1,718,777 | $1,838,788 | $1,774,056 |

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The above noted ranking and funding decisions were finalized after careful consideration of Epworth’s proposal. A total of $244,001 (Tier 1 $198,406; Tier 2 $45,595) in funding was based on funding availability pursuant to CoC priorities while ensuring the Saint Louis County CoC remains competitive.

Sincerely,

[Signature]

Andrea Jackson Jennings
Director, Department of Human Services

Enclosure

cc: Tom Fee
Director, Family and Community Services

Chaunceia Mayfield,
Program Manager, Homeless Services Program
September 25, 2017

Youth In Need
1815 Boone's Lick Road
St. Charles, MO 63301
ATTN: Colleen Condren, Regional Director

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<td></td>
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The above noted ranking and funding decisions were finalized after careful consideration of Youth In Need’s proposal. $16,189 in funding was based on funding availability pursuant to CoC priorities while ensuring the Saint Louis County CoC remains competitive.

Sincerely,

[Signature]

Andrea Jackson Jennings
Director, Department of Human Services

Enclosure

cc: Tom Fee
   Director, Family and Community Services

Chauciea Mayfield,
   Program Manager, Homeless Services Program
1. Addition of Detailed Scope of Services the Application Requirements on page 7 and Attachment H – Application Requirements Checklists on page 28.
   a. Proposal Cover Sheet (General Agency Information)
   b. Table of Contents
   c. Director of Project
   d. Project Narrative
   e. Detailed Scope of Services (To include the number of clients to be served and/or units provided)
   f. Project Budget & Detailed Budget Narrative (Attachment A)
   g. Fiscal Compliance Section (Attachment B)
   h. Programmatic Compliance Section (Attachment C)
   i. Authorized Signature Form (Attachment D)
   j. E VERIFY IMMIGRATION LAWS AFFIDAVIT IN EXCESS OF $5000.00 (Attachment E)
   k. Exceptions to Section 8 (Attachment F)
   l. Housing First Checklist (Attachment G)
   m. Application Requirements Checklist (Attachment H)

2. Addition of Agency Summary Package as a required supplemental document to section 14 on page 8.

3. Addition of Housing First Checklist Attachment G to the Application Requirements, page 27.


5. The County has decided that the Pre-Proposal Conference is not mandatory. However, it is highly recommended to afford Agencies the opportunity to gain any needed clarification on the proposal requirements and process. Future Scoring Criteria will include bonus points for attending the Pre-Proposal Conference.
SAINT LOUIS COUNTY DEPARTMENT OF HUMAN SERVICES
REQUEST FOR PROPOSALS

HOMELESS SERVICES PROGRAMS

Continuum of Care Program 2017
Request For Proposal #2017- 49 - PR

Proposal Due Date: August 25, 2017 4:00 p.m. Prevailing Central Time

Submit Proposals To:
Division of Procurement,
St. Louis County Government
8th Floor, 41 S. Central Ave.
Clayton, MO 63105

Submit:
2 (two) printed, signed original proposals
6 additional copies of the original proposal
6 copies of the Agency Summary Packet

Important Notice:
Effective immediately upon release of this Request for Proposals (RFP), and until notice of contract award, all official communications from Proposers regarding the requirements of this RFP shall be directed to the Director, Division of Procurement, 8th floor, 41 S. Central Avenue, Clayton, MO 63105 at purchasing@stlouisco.com. The Director, Division of Procurement, or designee shall distribute all official changes, modifications, responses to questions or notices relating to the requirements of this RFP by posting the same to the St. Louis County website with the RFP. Any other information of any kind from any other source shall not be considered official, and Proposers relying on other information do so at their own risk.
ST. LOUIS COUNTY  
DEPARTMENT OF HUMAN SERVICES, HOMELESS SERVICES PROGRAM  
REQUEST FOR PROPOSAL  

CONTINUUM OF CARE GRANT FUNDING YEAR 2017

GENERAL AGENCY INFORMATION- Information required in this section is in reference to the agency submitting the proposal.

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<th>A. Applying Agency</th>
<th>E. Type of Organization</th>
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<td>Public Non Profit</td>
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<th>B. Address</th>
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<table>
<thead>
<tr>
<th>C. Contact Person, Title, Phone, &amp; E-Mail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name Title</td>
</tr>
<tr>
<td>Name Title</td>
</tr>
</tbody>
</table>

Name, Title & email address of persons authorized to sign contract

<table>
<thead>
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<th>Name Title</th>
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Signature Date

FOR ST. LOUIS COUNTY PROCUREMENT OFFICE USE ONLY

Date Received: Time Received:

Received By:

Proposals Due: August 25, 2017 by 4:00 p.m.
Return Proposal to: St. Louis County: Attn: Saint Louis County: Attention Procurement 8th Floor, 41 South Central Avenue Clayton, MO 63105
TABLE OF CONTENTS

Section 1: The Project
Section 2: RFP Schedule, Instructions and Communications
Section 3: County Insurance Requirements
Section 4: Scope of Work
Section 5: Term of Contract
Section 6: Proposal Contents
Section 7: Evaluation of Proposals
Section 8: Contract Requirements
Section 9: Attachments
Attachment A: Project Budget
Attachment B: Fiscal Compliance
Attachment C: Programmatic Compliance
Attachment D: Authorized Signature Form
Attachment E: E-Verify Work Authorization
Attachment F: Exceptions to Section 8
Attachment G: Checklist
SECTION 1: The Project:
The St. Louis County Department of Human Services is the Collaborative Applicant and the Grants Administrator for the St. Louis County Continuum of Care (CoC). Our goal is to reduce the prevalence of homelessness in our region by developing permanent solutions for homeless individuals and families. Over the past several years, the St. Louis County’s Homeless Services Program has played an active role in supporting efforts to prevent, reduce, and end homelessness in St. Louis County, and it has led initiatives to improve delivery of services to homeless individuals and families. Emergency Shelter, Transitional Housing, Permanent Supportive Housing, Rapid Rehousing, Prevention, and Homeless Management Information System (HMIS) services are contracted through a variety of nonprofit partners in the St. Louis area.

In the period of time between 2013 and 2016, the St Louis County Continuum of Care (CoC) was transformed from an informal network of service providers to an effective coordinating body that powers the service delivery to homeless populations in the community, with the St. Louis County's Homeless Services Program serving as the Collaborative CoC Applicant and administrative entity. The Homeless Services Program team and the St. Louis County’s CoC together serve a pivotal role in ensuring that services are effectively in line with both funder guidelines and a broad vision for reducing and ending homelessness.

A turning point in Homeless Services’ planning was achieved in January 2016 when a regional agreement among multiple Continuum of Care was initiated to transition to a new system of intake of homeless clients into the CoC network of provider agencies. A Homeless Hotline had been the traditional point of access for homeless people. Eligibility was on a first-come first-served basis, and the overall bed capacity could serve only 40% of people in need of immediate shelter and other housing. The new system of Coordinated Entry is opening multiple points of entry, where assessment and immediate shelter is to be provided, followed by placement in housing and prevention of loss of housing where possible. The intention is to allow clients to be placed directly into an appropriate housing intervention and streamline the use of resources, rather than funneling all clients through shelter, when shelter may not be the most appropriate intervention.

The St. Louis County Department of Human Services, Homeless Services Program, located at 9666 Olive Blvd., Suite 510, St. Louis, MO 63132 is requesting proposals for programs that address the need for Transitional Housing (TH), Permanent Housing (PH) and Rapid Rehousing for St. Louis County individuals and families who are homeless. The Continuum of Care Grant 2017 funds are available through a Request for Proposals. These funds are governed by applicable federal, state, and local laws, regulations and requirements, and by policies and expectations of the St Louis County Department of Human Services. Please refer to The Continuum of Care Grant regulations at 24CFR Part 578 for complete information regarding eligible costs and program requirements and the Continuum of Care Grants Program Components Quick Reference listed on the St. Louis County web site.

Notice to Proposers:
This Request for Proposals (RFP) is for funding to be made available during calendar year 2017-2018 for Continuum of Care grants. It is important to be aware that a twenty-five percent (25%) match will be required for each Continuum of care grant awarded to agencies.

Project Priorities:
The intention of this RFP is to encourage applicant agencies to focus their proposed activities on HUD priorities, local needs, and strategies to address them. The goal is to align projects and priorities in order to facilitate maximum benefit and outcomes for homeless clients. The Saint Louis County Department of Human Services Homeless Services Program, is requesting proposals for projects and programs that address the need for permanent housing for Saint Louis County individuals and families. The Saint Louis County CoC has identified priority homeless populations as the Chronic homeless, Veterans, Families with minor children, Youth (16-24 years old), Domestic Violence survivors, and medically frail. This is a new project under the U.S. Department of Human and Urban Development (HUD) Notice of Funding Availability (NOFA) FY2017 CoC Program (24 CFR part 578) and has very specific requirements. The Housing First Model must be applied to this project. The total funding available is $226,628.00. St. Louis County may choose one proposal or multiple proposals.
St. Louis County is seeking new project(s) under the 2017 HUD Continuum of Care Notice of Funding Availability. Projects should fall into one of four categories:

- The creation of new Permanent Supportive housing that will serve 100 percent chronically homeless families and individuals through permanent housing bonus; or reallocation if available.
- The creation of rapid re-housing that will serve homeless individuals, youth or families coming directly from a place not meant for human habitation or emergency shelters, and includes persons fleeing domestic violence situations and other persons meeting the criteria of paragraph (4) of the definition of homelessness through permanent housing bonus.
- Expansion of existing Permanent Supportive Housing programs that are currently eligible for renewal.

St. Louis County is seeking interested organizations that demonstrate the attributes listed below:

- Competent and cooperative management with a vision for staffing and support
- A commitment and ability to ensure that customer service oriented staff are available to serve homeless, throughout the period of performance of the project(s)
- A willingness to integrate resources and activities with other organizations
- Flexibility in deploying human resources and an ability to adapt to change as economic conditions and operational needs evolve

St. Louis County Homeless Services Program intends to be as inclusive as possible in the solicitation. The objective is to receive several high quality proposals that articulate clear and aggressive strategies for housing, and other service designed to assist homeless consumers. The resulting contracts with the successful proposers will be for a twelve-month period. **Agencies are required to submit a proposal and the Agency Summary Packet.**

A. Functions and Requirements:

St. Louis County Department of Human Services, Homeless Services Program will be responsible for administration and oversight of the contracts. The sub-recipient must have the management capacity to administer a grant program and will be responsible for intake, eligibility determination, and follow-up services. The agency or organization providing the service activities will be subject to an extensive set of reporting and monitoring requirements as developed by St. Louis County Department of Human Services, Homeless Services Program. These reports will be required as necessary to carry out monitoring and evaluation of activities as mandated by HUD HEARTH Final Rule regulations. The full HEARTH Final Rule text may be found at: [https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf](https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf)

Agencies and organizations submitting a proposal should be familiar with the basic requirements outlined in the HEARTH Final Rule, CoC Program interim rule (24 CFR 578), and should provide evidence in the proposal of the necessary staff skills, knowledge, and abilities to see that these requirements are met. Interested applicants should read the 2017 HUD NOFA in its entirety in order to ensure a comprehensive understanding of the CoC program requirements. The full 2017 HUD NOFA text may be found at: [https://www.hudexchange.info/resources/documents/FY-2017-CoC-Program-Competition_NOFA.pdf](https://www.hudexchange.info/resources/documents/FY-2017-CoC-Program-Competition_NOFA.pdf)

The sub-recipient must have the management capability to submit a reimbursement request for services rendered on a monthly basis to the St. Louis County Homeless Services Program. Requests for reimbursement shall be submitted to the St. Louis County Homeless Services Program no later than the 15th day following the month for which reimbursement for those services was requested.

*Late and re-submitted requests for reimbursement may be disallowed and denied payment if submitted after 15 (fifteen) days past the original due date.*

B. This RFP is not in itself an offer to work nor does it commit St. Louis County to fund any proposals submitted.
St. Louis County is not liable for any costs incurred in the preparation or research of proposals. St. Louis County reserves the right to make an award to any proposer or to make no awards, if that is deemed to serve the best interest of the St. Louis County Region. In addition, St. Louis County reserves the right to:

1. Amend or withdraw this RFP at any time
2. Reject any and all proposals
3. Re-issue this RFP

C. Disclaimers

1. Failure to follow the RFP process can result in the outright rejection of a proposal. Any existing sub-recipient with St. Louis County is prohibited from utilizing any funds currently awarded to respond to this RFP.
2. All commitments made by St. Louis County are contingent upon the availability of Continuum of Care Grant 2017 funds.

D. In the event it becomes necessary to revise any part of this RFP, a written addendum will be issued. Any amendment to this RFP shall be valid only if in writing and issued by St. Louis County. Verbal conversations or agreements with any officer, agent, or employee of St. Louis County which may modify any terms or obligations of this RFP shall be invalid.

E. St. Louis County may require proposers selected to participate in negotiations without discussion of an offer with the proposer. Proposals should be submitted in the most favorable terms from a price and technical standpoint. St. Louis County reserves the right to request any additional data or discussion/presentation in support of the written proposal at any time, prior to the execution of a contract.

F. Upon award, that sub-recipient assumes full responsibility for administration of the program activity and expenditures of funds in accordance with the corresponding federal or local grant funding regulation. Each sub-recipient will be liable for any disallowed or illegal expenditure of funds or program operation conducted under this contract. Disallowed or illegal costs will be subject to repayment from non-federal funds to St. Louis County by the sub-recipient.

G. Type of Contract

1. The RFP is for a cost-reimbursement contract.
2. Conflict of interest policies issued by St. Louis County will be effective throughout all phases of this procurement process.

SECTION 2: RFP SCHEDULE, INSTRUCTIONS AND COMMUNICATIONS

2.1 Listed below are the milestone dates of activities related to this RFP. In the event these dates change, Proposers will be notified via addendum posted on the St. Louis County ("County") website. It is County’s goal to meet the dates specified.

<table>
<thead>
<tr>
<th>Milestone</th>
<th>Estimated Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Request For Proposal Issuance</td>
<td>August 7, 2017</td>
</tr>
<tr>
<td>Pre-Proposal Conference (Mandatory Attendance)</td>
<td>August 10, 2017</td>
</tr>
<tr>
<td>Deadline for Questions &amp; Clarifications</td>
<td>August 11, 2017</td>
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<tr>
<td>Issuance of final Addendums</td>
<td>August 18, 2017</td>
</tr>
<tr>
<td>Proposals Due 4:00 p.m.</td>
<td>August 25, 2017</td>
</tr>
</tbody>
</table>

2.2 Instructions:

1. Direct all inquiries and correspondence in writing to:

   St. Louis County Division of Procurement
   ATTN: Director of Procurement
2. Contact with any representative, other than that outlined herein, concerning this RFP is prohibited. "Representative" shall include, but not be limited to, all elected and appointed officials, and employees of County and the agencies within St. Louis County. Any Proposer engaging in such prohibited communications may be disqualified at the sole discretion of the County Director of Procurement.

3. Any questions regarding the RFP shall be submitted in writing by August 11, 2017 at 2:00 p.m. Central Standard Time, to allow time for posting of any necessary addendums before the submission deadline. Questions may be submitted via email at [preuter@stlouisco.com]

4. A pre-proposal conference to review the RFP will be held on August 10, 2017 the St. Louis County Department of Public Health, 6121 N. Hanley Rd. Berkeley, MO 63134, Community Room 1048 at 1:30 – 3:30 p.m. Attendance is required at the pre-proposal conference.

5. Organizations should read all contents of the RFP before beginning their response.

6. Responses to all requested information should be typed in 12-point font, double spaced and answered completely, honestly, and to the best of your organization’s ability. Fancy bindings and other presentations beyond that required by the RFP should not be included.

7. Applications received by Saint Louis County Homeless Services Program will be screened to ensure that all basic information has been provided and minimum requirements are met. The Saint Louis County Homeless Services Program review committee will certify proposals for the ranking and review process which will follow the evaluation criteria.

8. Eight (8) copies of the completed proposal must be submitted. Two (2) copies must bear the original signature of the agency official authorized to enter into contract with Saint Louis County. Six (6) completed copies of the Agency Summary Packet must also be submitted in addition to the proposal.

9. All copies must be received in sealed envelopes stating Continuum of Care Grant 2017-RFP-49PR

10. Proposals that are either hand or courier delivered will be dated and time stamped with a receipt issued.

11. Proposals that are mailed will be dated and time stamped upon receipt.

12. Proposals that are faxed, scanned or email will not be accepted.

13. Organize the application pages sequentially, starting with the front page of this application, as follows:

   a. Proposal Cover Sheet (General Agency Information)
   b. Table of Content for the Proposal
   c. Project Narrative - Scope of Services
   d. Director of Project
   e. Project Budget (Attachment A)
   f. Fiscal Compliance Section (Attachment B)
   g. Programmatic Compliance Section (Attachment C)
   h. Authorized Signature Form (Attachment D)

14. The following documents should be attached to the originals only in the order given below; it is not necessary to number these documents:

   a. Evidence of 501(c)(3) status
   b. Articles of Incorporation
   c. Organizational By-Laws
   d. Current List of the Board of Directors and Officers
e. Authorized Signature Page (Please provide two original copies)

f. 2016 Agency Budget, including Financial Sources and Uses

2. 2015 Audit (or Q4 2016 Financial Statements and Balance Sheet if 2015 Audit is not complete)

h. Proof of General Liability Insurance

2.3 Submission and Opening of Proposals

1. Proposals shall be submitted in a sealed envelope labeled “Continuum of Care Grant 2017-RFP-49PR”. Proposers using commercial carriers shall ensure that the proposal is marked on the outermost wrapper. The proposal, in the form of two original and six copies shall be received by no later than 4:00 p.m. Central Standard Time on August 25, 2017 at the Saint Louis County Division of Procurement, 41 S. Central, 8th Floor, St. Louis, Missouri, 63105. Any proposals received after the time specified for the receipt of proposals shall not be considered unless the Proposer provides and County accepts reasons demonstrating good cause for the delay. It is the responsibility of the Proposer to ensure that the package is received at the right location before the outlined deadline of August 25, 2017 at 4:00 p.m. Central Standard Time.

2. Saint Louis County reserves the right to accept or reject any or all proposals and to waive any irregularities in the proposals if such waiver does not substantially change the offer or provide a competitive advantage to any Proposer.

3. No proposals submitted by email or facsimile, or any modifications to previously submitted proposals, made by email or facsimile, shall be considered. If a proposal is sent by mail, allowance shall be made by the Proposer for the time required for such transmission.

4. A legally authorized representative of the Proposer shall sign the proposal. All Proposers must complete and submit two (2) original Attachment 2 – Authorized Signatures.

5. No responsibility shall be attached to any person for premature opening of a Proposal not properly identified.

6. Saint Louis County is subject to Chapter 610 of the Revised Statutes of Missouri. The contents of proposals submitted in the RFP process, with selected exceptions, shall be open records and be open to inspection by interested parties after a contract is executed.

7. All opened proposals become the property of Saint Louis County.

8. No corrections are permitted after the closing time. If a correction is required, the Proposer shall submit an amendment to the original proposal identifying the section, article, and page number(s) of the change made in a sealed envelope entitled AMENDMENT and labeled with the RFP number, title, Proposer name, and proposal due date.

9. Failure of the Proposer to comply with the requirements of this RFP or evidence of unfair proposal practices are causes for rejection of the proposal.

10. This RFP does not commit Saint Louis County to make an award, nor shall Saint Louis County pay any costs incurred by Proposers in the preparation and submission of proposals, or costs incurred in making necessary studies for the preparation of proposals.

2.4 Formation of Agreement:

1. Saint Louis County intends to enter into negotiation in an effort to reach a mutually satisfactory agreement, which represents a contractual obligation and shall be executed by both Saint Louis County and the Proposer. The language contained in Section 8 of this RFP, “Contract Requirements” shall be included in the negotiated agreement. The agreement shall be based on the proposal documents, the proposal submitted by the selected Proposer and items resulting from the associated negotiations.

2. Saint Louis County reserves the right to award based on the Proposal determined to be in the best interest of Saint Louis County.
2.5 Modification or Withdrawal of Proposal:

1. Proposals may be withdrawn any time prior to the scheduled closing time for receipt of proposals; no proposal may be modified or withdrawn for a period of one-hundred twenty (120) calendar days thereafter.

2. Proposers are responsible for submitting proposals, and any modifications or revisions, so as to reach the County Division of Procurement by the time specified in the RFP documents. Any proposal, modification, or revision received at the County Division of Procurement after the exact time specified for receipt of offers is "late" and shall not be considered and shall be returned unopened.

3. Prior to the date and time designated for receipt of proposals, proposals submitted early shall be withdrawn only by written notice to County. Such notice shall be received by County prior to the designated date and time for receipt of proposals.

4. Withdrawn proposals may be resubmitted up to the time designated for receipt of proposals provided that they are then fully in conformance with this RFP.

5. If an emergency or unanticipated event interrupts normal County business or processes so that proposals cannot be received at the office designated for receipt of proposals by the exact time specified in the solicitation, and urgent County requirements preclude amendment of the RFP, the time specified for receipt of proposals shall be deemed to be extended to the same time of day specified in the RFP on the first work day on which normal County business resume.

SECTION 3: County Insurance Requirements:

Professional Liability Insurance

The successful proposer ("Contractor") agrees to carry the following insurance coverage during the period of this contract and will provide County with Certificates of Insurance for all required coverage prior to commencement of the work under this contract.

Indemnification/ Liability Insurance

The contractor agrees to defend and indemnify the county against claims for bodily injury, death, and property damage which arises in the course of the Contractor's performance of the agreement with respect to the degree to which the County is free from responsible for consequential or compensatory damages arising from the late performance or nonperformance of this agreement caused by circumstances which are beyond the County's control.

The insurance coverage shall include, but not necessarily be limited to, general liability, errors and omissions, professional liability, etc. Written evidence of the insurance coverage shall be provided by the Contractor to the County. Evidence of self-insurance coverage or of another alternate risk financing mechanism may be utilized provided that submitted before or upon award of the contract.

Contractor shall provide County with notice of policy cancellation, termination or modification of any kind within (30) thirty calendar days of the change.

SECTION 4: Scope of Work:

Services Required: Please review and print the HUD Exchange Continuum of Care Program Guidance. https://www.hudexchange.info/programs/coc/

The Housing and Urban Development Continuum of Care Service Scope shall include, but is not limited to the following components:

Permanent Supportive Housing:
The CoC Program funds two types of permanent housing: permanent supportive housing (PSH) for persons with disabilities and rapid re-housing (RRH). PSH is permanent housing, subject to review based on need, with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families
with an adult or child member with a disability achieve housing stability. RRH emphasizes housing search and relocation services and short- and medium-term rental assistance to move homeless persons and families (with or without a disability) as rapidly as possible into permanent housing. Eligible categories for CoC funding include:

- **Leasing Costs**
  Leasing is an eligible cost category under the PSH program components. Funds may be used to lease individual units or all or part of structures. Rents must be reasonable and, in the case of individual units, the rent paid may not exceed HUD Fair Market Rents. Leasing funds may not be used for units or structures owned by the recipient, sub-recipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership where the partnership owns the structure without a HUD-authorized exception. When leasing funds are used to pay rent on units, the lease must be between the recipient or the sub-recipient and the landowner, with a sublease or occupancy agreement with the program participant. The recipient may, but is not required to, charge the program participant an occupancy charge, consistent with the parameters specified in the interim rule.

- **Rental Assistance Costs**
  Rental assistance is an eligible cost category under the PSH program components and may be tenant based (TBRA), sponsor-based (SBRA), or project-based (PBRA), depending upon the component type. Rental assistance may be short-term for up to 3 months; medium-term for 3 to 24 months; or long-term for more than 24 months. The length of assistance depends upon the component type under which the cost is funded. Recipients must serve as many program participants as identified in their funding application to HUD. However, if the amount reserved for the term of the grant exceeds the amount needed to pay actual costs, the excess funds may be used to cover property damage, rent increases, or the rental needs of a greater number of program participants.
  - **TBRA.** Program participants select any appropriately sized unit within the CoC's geographic area, although recipients or sub-recipients may restrict the location under certain circumstances to ensure the availability of the appropriate supportive services. Except for victims of domestic violence, program participants may not retain their rental assistance if they relocate to a unit outside of the CoC’s geographic area without prior written permission by the St. Louis County DHS and HUD.
  - **SBRA.** Program participants must reside in housing owned or leased by a sponsor organization and arranged through a contract between the recipient and the sponsor organization.
  - **PBRA.** Program participants must reside in housing provided through a contract with the owner of an existing structure whereby the owner agrees to lease subsidized units to program participants. Program participants may not retain their rental assistance if they relocate to a unit outside the project. When rental assistance funds are used to pay rent on units, the lease must be between the program participant and the landowner. Each program participant, on whose behalf rental assistance payments are made, must pay a contribution toward rent consistent with the requirements of the interim rule.

- **Supportive Services Costs**
  Supportive services are eligible costs under the PSH program component. The CoC Program interim rule specifies all eligible services and clarifies that any cost not listed in the rule is ineligible. Services must be offered to residents of PSH for the full period of their residence. Recipients and sub-recipients are required to perform an annual assessment of the service needs of their program participants and to adjust services accordingly. Eligible costs include the cost of providing services, the salary and benefits of staff providing services, and materials and supplies used in providing services.

- **Operating Costs**
  Operating costs are eligible under the PSH program component. Funds may be used to pay the day-to-day operating costs in a single structure or individual housing units. Examples of eligible operating costs include maintenance (such as scheduled replacement of major systems), repair, building security (when CoC Program funds pay for more than 50 percent of the facility by unit or area), electricity, gas, water, furniture, equipment, property insurance, and taxes. These costs may not be combined with rental assistance costs within the same unit or structure.

- **Administration**
  Administration costs include expenses related to the overall administration of the grant such as management, coordination, monitoring, and evaluation activities and environmental review. Administration funds are shared equally with the applicant and the Department of Human Services.
Rapid Rehousing:
Rapid Re-Housing (RRH) assistance aims to help individuals or families who are homeless move as quickly as possible into permanent housing and achieve stability in that housing through a combination of rental assistance and supportive services. Communities have demonstrated and research has shown that RRH is a valuable strategy for quickly transitioning individuals and families directly from shelter into permanent housing with needed supports. CoC RRH grant funds may be used to provide short- and/or medium-term rental assistance and limited supportive services (i.e. housing stability case management, landlord-tenant mediation, tenant legal services, credit repair) to help an individual or family that is homeless move as quickly as possible into permanent housing and achieve stability in that housing. Supportive services may be provided up to 6 months after rental assistance has stopped. See 24 CFR 576.104

- **Supportive Services Costs**
  Supportive services are eligible costs under the RRH program component. The CoC Program interim rule specifies all eligible services and clarifies that any cost not listed in the rule is ineligible. Services must be offered to residents of RRH for the full period of their residence. Recipients and sub-recipients are required to perform an annual assessment of the service needs of their program participants and to adjust services accordingly. Eligible costs include the cost of providing services, the salary and benefits of staff providing services, and materials and supplies used in providing services.

- **Operating Costs**
  Operating costs are eligible under the RRH program component. Funds may be used to pay the day-to-day operating costs in a single structure or individual housing units. Examples of eligible operating costs include: maintenance (such as scheduled replacement of major systems), repair, building security (when CoC Program funds pay for more than 50 percent of the facility by unit or area), electricity, gas, water, furniture, equipment, property insurance, and taxes. These costs may not be combined with rental assistance costs within the same unit or structure.

- **Administration**
  Administration costs include expenses related to the overall administration of the grant such as management, coordination, monitoring, and evaluation activities and environmental review. Administration funds are shared equally with the applicant and the Saint Louis County DHS.

4.1 Qualifications

**Requirements of Proposers:**

A. **Freedom of Information Act:**
Proposing organizations should note that under the requirements of the Freedom of Information Act (FOIA), the contents of your proposal or other information submitted to St. Louis County Homeless Services Program is subject to public release upon request, except those items specifically exempt from disclosure. The proposer shall mark as "proprietary" those parts of its proposal that it deems proprietary. However, the proposer is alerted that this marking is advisory only and not binding on St. Louis County Homeless Services Program. If there is a request from the public under FOIA to inspect any part of the proposal so marked, St. Louis County Homeless Services Program will advise the proposer and request further justification in support of the "proprietary" marking. If St. Louis County Homeless Services Program determines, after receipt of the justification, that the material is releasable, the proposer will be notified immediately. Under no circumstances will a proposal or any part of a proposal be released prior to the contract award decision.

B. **E-Verify:**
The winning proposer must subscribe to and use E-Verify to ensure all staff and potential staff working under this contract meets the illegal immigrant policies set forth by the State of Missouri.

C. **Confidentiality Agreement**
The successful proposer must have all staff and volunteers that work with participant’s files and related information complete a State of Missouri approved Confidentiality Agreement before working with any confidential information, whether verbal or written.

D. **Contractor Status**
The contractor staff shall not represent himself / herself to be an employee of St. Louis County. Therefore, the contractor shall assume all legal and financial responsibility for taxes, FICA, employee fringe benefits, workers compensation, employee insurance, minimum wage requirements, overtime, etc., and agrees to indemnify, save, and hold St. Louis County, its officers, agents, and employees, harmless from and against, any and all loss; cost (including attorney fees); and damage of any kind related to such matters. The contractor will be responsible for informing their staff of the above statements.

E. Invoice Submission
Contractor will submit monthly invoices by the 15th of each to St. Louis County Department of Human Service- Homeless Services Program, 6666 Olive Blvd, Suite 510, St. Louis, Missouri 63132. Invoicing format will be provided to the Contractor upon execution of the contract. Failure to submit invoices by the 15th of each month will be considered a violation of the potential contractor.

4.2 Application Requirements:

Director of the Project Narrative:
Identify the person primarily responsible for directing/managing the project described in the narrative. Include detailed information pertinent to her/his experience and expertise. Limit narrative to one page. Bold the title.

Definitions: The following definitions shall apply to this Request for Proposal process:

- Contract means a legal and binding agreement between two or more competent parties, for a consideration for the procurement of services identified by and resulting from this RFP process.
- Contractor means a person or organization who is a successful proposer as a result of the RFP and who enters into a contract with St. Louis County for such services.
- Proposer means the person or organization that responds to this RFP by submitting a proposal for services as required in the RFP document.
- Request for Proposals (RFP) means the solicitation document issued by St. Louis County through its Department of Human Services, Homeless Services Program

4.4 Documentation/Deliverables

SECTION 5: Terms of Contract:

Requested Term (one year)
October 1, 2017 through September 30, 2018. Prospers must be prepared to implement all prospered services on day one of the contract period.

Section 6: Proposal Contents:

6.1 Project Narrative:

Proposal Requirements: To standardize proposals and to be considered for ranking, proposals shall be submitted in the following format: (Limit this narrative section to three pages, numbered)

6.2 Each Proposal shall include a description of the Proposer’s capacity to meet the RFP requirements including but not limited to the financial capacity of the firm, the size of the technical staff, and the ability to perform the desired work within the defined contract period. Proposer must provide a narrative addressing the following criteria, regardless of funding category, in order to be reviewed and ranked by the review committee for this grant program: Please bold each section title:

6.3 Provide qualifications and experience in providing similar services. The Proposer shall demonstrate that it possesses the experience necessary to successfully perform the services required by this RFP and the ability to work in a responsive and cooperative manner with County staff. List key personnel who would be assigned to work on the proposed project, their title and specific role, a description of the extent of the staff experience and expertise
with work related to proposed services.

6.4 Describe the Proposer’s proposed approach for providing the services. This section should include a detailed breakdown and description of the specific steps that will be followed to perform the services required by this RFP. Proposers may elect to include in this section any innovative methods or concepts that might be beneficial to the services provided as long as the requirements established in this RFP are met.

6.3 In this section also include two (2) references of organizations for whom Proposer has provided similar services (to those sought by this RFP) within the last five (5) years. Each reference must include the organization’s name, mailing address, contact name, contact telephone, email information, and the specific service(s) provided by the Proposer.

6.4 A description of the population being served and the number to be served

6.5 A description of measurable outcomes to include plans for moving clients to stability.

6.6 A description of the reputation of the applicant organization for providing client centered services, being financially sound, and any partnerships/collaborations with other agencies.

6.7 A description of the organization’s involvement in the St. Louis County Continuum of Care, including membership status, committee representation, and collaborations with Continuum of Care members.

6.8 An explanation and description of how Housing First principles are being implemented in the proposed activities.

6.9 A statement on the Board of Directors of the applicant organization as it pertains to current or formerly homeless participation and diversity as a whole.

Section 7: Evaluation of Proposals:

As part of the selection process, the following scoring criteria will be used to evaluate proposals.

<table>
<thead>
<tr>
<th>Continuum of Care Grant Scoring Criteria</th>
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<tbody>
<tr>
<td><strong>General Information</strong></td>
</tr>
<tr>
<td>0-15 pts All required documents submitted and submitted on time</td>
</tr>
<tr>
<td>0-5 pts Priority Housing Service.</td>
</tr>
<tr>
<td><strong>Alignment with Opening Doors</strong></td>
</tr>
<tr>
<td>0-3 pts Project dedicates beds for persons experiencing chronic homelessness.</td>
</tr>
<tr>
<td>0-1 pts Project prioritizes beds for persons experiencing chronic homelessness</td>
</tr>
<tr>
<td>0-12 pts Project serves a priority population (Chronic, Families with children, Youth 16-24, Vets, Medically Frail and Domestic Violence).</td>
</tr>
<tr>
<td>0-3 pts Project demonstrated commitment to participate in Coordinated Entry system, use standardized assessment tool selected by CoC, and comply with Coordinated Entry policies and procedures.</td>
</tr>
<tr>
<td><strong>Experience</strong></td>
</tr>
<tr>
<td>0-10 pts Experience of applicant working with the proposed population and in providing housing similar to the proposed in the application.</td>
</tr>
<tr>
<td>0-24 pts Commitment to Housing First practices.</td>
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<tr>
<td>0-5 pts Experience in effectively utilizing funds including HUD grants and other public funding.</td>
</tr>
<tr>
<td><strong>Design of Housing and Supportive Services</strong></td>
</tr>
<tr>
<td>0-15 pts Extent to which applicant demonstrates ...</td>
</tr>
<tr>
<td>a. Understanding of need of clients to be served</td>
</tr>
<tr>
<td>b. Type, scale and location fits the need of clients</td>
</tr>
<tr>
<td>c. Type and scales of supportive service to meet the needs of clients</td>
</tr>
<tr>
<td>d. How clients will be assisted in obtaining mainstream resources</td>
</tr>
<tr>
<td>e. Establishes performance measures for housing and income that are objective, trackable and meet or exceed HUD and CoC benchmarks</td>
</tr>
<tr>
<td>Points</td>
</tr>
<tr>
<td>--------</td>
</tr>
<tr>
<td>0-5 pts</td>
</tr>
<tr>
<td>0-5 pts</td>
</tr>
</tbody>
</table>

**Fiscal Practices**

<table>
<thead>
<tr>
<th>Points</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-20 pts</td>
<td>Budget costs are reasonable, allocable and allowable</td>
</tr>
<tr>
<td>0-3 pts</td>
<td>Total Program Sources Leveraged from Source other than CoC program funds are equal to or more than 10% of the Project’s total leverage requirement.</td>
</tr>
</tbody>
</table>

**Timeliness**

<table>
<thead>
<tr>
<th>Points</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-10 pts</td>
<td>Plan for a rapid implementation of the program, documenting how the project will be ready to begin providing services on the first day of the grant cycle.</td>
</tr>
</tbody>
</table>

**Project Effectiveness**

<table>
<thead>
<tr>
<th>Points</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-3 pts</td>
<td>Coordinated Entry participation</td>
</tr>
</tbody>
</table>

**Community Involvement**

<table>
<thead>
<tr>
<th>Points</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-5 pts</td>
<td>Attendance at CoC General meetings</td>
</tr>
<tr>
<td>0-1 pts</td>
<td>Attendance participation in CoC Committees</td>
</tr>
<tr>
<td>0-1 pts</td>
<td>Participation in the Executive Board, as an Officer</td>
</tr>
<tr>
<td>0-10 pts</td>
<td>Current status of HMIS implementation plan</td>
</tr>
</tbody>
</table>

**Bonus Points**

<table>
<thead>
<tr>
<th>Points</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-5 pts</td>
<td>Agency will be expanding its existing PSH beds/units</td>
</tr>
<tr>
<td>0-5 pts</td>
<td>RR projects that will serve homeless individuals and families including youth up to age 24</td>
</tr>
<tr>
<td>0-3 pts</td>
<td>No HUD agency findings or corrective actions within the last 12 months</td>
</tr>
</tbody>
</table>

**SECTION 8: Contract Requirements:**

**8.1 Contract Terms:** The following contract terms, in addition to requirements and services identified herein shall be included in the contract entered into by the County and the successful Proposer.

A response, this section is required. Proposer shall acknowledge acceptance of the contract terms or state "Take Exception" to each specific term and offer alternative language. Proposer shall specifically list any exceptions taken (by number) in Attachment F. If no exceptions are taken, Proposer may acknowledge acceptance of the contract terms by stating such position on Attachment F.

**8.2 Independent Proposer:** The relationship of the Proposer to the County shall be that of independent Proposer and no principal agent or employer-employee relationship is created by the contract.

**8.3 Conflict of Interest:** The Proposer shall not employ as a director, officer, employee, agent, or subcontractor any elected or appointed official of the County or any member of his/her immediate family.

**8.4.1 Non-Discrimination of Employment:** The Proposer shall not discriminate against any employee or applicant for employment because of race, creed, color, gender, sexual orientation, gender identity or national origin, age, marital status, or disability. Proposer shall take affirmative action to insure that applicants are employed and that employees are treated during their employment without regard to race, creed, color, gender, sexual orientation, gender identity or national origin, age, marital status, or disability. Such action shall include, but not be limited to, the following: employment upgrading, demotion or transfer, rates of pay or other forms of compensation, and selection for training including apprenticeship. In the event of Proposer’s noncompliance with the provisions of this paragraph, the contract may be terminated or suspended in whole or in part and Proposer may be declared ineligible for further County contracts.

**8.4.2 Obligations and Subcontracts:** The Proposer agrees to be responsible for the accuracy and timeliness of the work submitted in the fulfillment of its responsibilities under this contract, whether completed by the
8.5 Changes in Contract:

The Contract may be changed only upon the written agreement of the parties.

8.7 Governing Law: This Contract is made and entered into in St. Louis County, Missouri, and the laws of the State of Missouri shall govern the construction of this contract and any action or causes of action arising out of this contract. Any and all claims or causes of action arising out of this contract shall be litigated in the Twenty-First Judicial Circuit Court of the State of Missouri.

A. Termination: The County shall have the right to terminate the contract immediately in the exercise of its absolute and sole discretion, upon written notice to the Proposer. After receipt of such notice, the contract shall automatically terminate without further obligation of the parties. Proposer must provide 90 days written notice to County of intent to terminate this contract.

B. Funding Out: This contract shall terminate at such time, if any, that the County Council fails to appropriate sufficient sums in the budget year for which the contract applies to pay the amount due.

C. Wording Conflicts: Should there be a conflict in wording between the contract and the Proposer's RFP response, the contract shall prevail. The Proposer's RFP response shall be attached and incorporated into the contract.

D. Indemnification: Proposer agrees to defend, indemnify and hold harmless the County, its elected and appointed officials, employees and volunteers from and against any and all liability for damage arising from injuries to persons or damage to property occasioned by any acts or omissions of the Proposer, its subcontractors, agents, servants or employees.

8.8 Homeless Definition:

The Contractor agrees to conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for CoC assistance along with the types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under § 576.400(d) and the written standards established under § 576.400(e). The Contractor agrees to re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once annually.

Contractor agrees to certify and maintain records that all homeless clients meet the HUD definition of homelessness, as defined in the HEARTH Homeless Definition Final Rule published in the Federal Register on December 5, 2011. Contractor agrees to use Attachment I to document all clients' homelessness, chronic homelessness, and at-risk of homelessness status.

Additionally, the Contractor agrees to certify and maintain records as applicable for clients who meet the HUD definition of chronic homelessness, meaning the individual or head of household (or if there is no adult in the family, a minor head of household) and meets the following conditions:

- Lives in a place not meant for human habitation, a safe haven, or an emergency shelter; and
- Has been homeless continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in the above paragraph. Stays in institutional care facilities for fewer than 90 days will not constitute a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven or an emergency shelter immediately before entering the institutional care facility.
- Has a disabling condition that is any of the following:
  - a disability as defined in Section 223 of the Social Security Act;
o a physical, mental, or emotional impairment that is expected to be of long-continued and indefinite duration, substantially impedes an individual’s ability to live independently, and is of such a nature that it could be improved by more suitable housing conditions
o a developmental disability as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act;

- The disease of acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiological agency for acquired immunodeficiency syndrome (HIV+).

Contractor agrees that clients who meet the HUD definition of at-risk of homelessness (as defined in 24 CFR Part 576 Sub-Part A § 576.2), including that the individual or family has an annual income below 30 percent of area median income as determined by HUD, are only eligible for services. When determining the annual income of an individual or family, the Contractor agrees to use the standard for calculating annual income under 24 CFR 5.609.

8.9 St. Louis Continuum of Care Membership:

The Contractor shall be an active member of the St Louis Continuum of Care. Active membership is defined within the St Louis CoC bylaws as follows:

- Serving as a participating member of the St Louis Continuum of Care;
- Serve on an appropriate Committee and attend meetings;
- Support and work toward implementing the goals of the Continuum of Care and share information and services within the Continuum;
- Input client information using the Homeless Management Information System (HMIS) or comparable HMIS database as required. Update the HMIS database as required.
- Work and cooperate with the Department of Human Services to secure new and expanded resources to serve homeless and at-risk individuals and families.
- Participate in ongoing staff development and technical assistance workshops provided by Department of Human Services.

Front Door Assessment & Referral Process

The St. Louis County Continuum of Care, in partnership with the St. Louis City Continuum of Care, has initiated a process to improve the delivery of housing and shelter services for families and individuals who experience homelessness or great risk of homelessness in our region. This process, the Homeless System Front Door Assessment Process, institutes consistent and uniform assessment processes to determine the most appropriate response to each individual or family’s immediate and long-term housing needs.

Representatives of the St. Louis County Continuum of Care worked closely with the Service Delivery Committee of the St. Louis City Continuum of Care to institute this process with a set of guiding principles that inform the design, implementation, and oversight of the system of care for persons experiencing a housing crisis in our region. Jointly the members of the Continuums of Care and homeless assistance providers work to-

- Rapidly exit people from their homelessness to stable housing
- Ensure that the hardest to serve, with the greatest needs, are served
- Serve clients as efficiently and effectively as possible
- Ensure transparency and accountability throughout the referral and assessment process

8.10 Special Conditions:

A. Contractors which are primarily religious organizations agree not to impose undue religious influence in their delivery of services per this contract in accordance with the principles as referenced in 24 CFR Part 576 Sub-Part B 576.22. There will not be discrimination at any level on the basis of religious.

B. As a provider of services to the homeless and/or at risk individuals and families in St. Louis County, the agency agrees to fulfill the following requirements:
• Serve as an active participating member of the St. Louis County Continuum of Care by attending General Membership Meetings and involvement in committees as outlined in the St. Louis County CoC Governance Charter.
• Support and work toward implementing the goals of the St. Louis County Continuum of Care by adopting Housing First.
• Input appropriate client information using Homeless Management Information System (HMIS) or HMIS comparable database as required.
• Work and cooperate with the Department of Human Services to secure new and expanded resources to serve homeless and at-risk individuals and families.
• Develop creative plans and approaches to address the needs of homeless and at-risk individuals and families.
• Participate in ongoing staff development and technical assistance workshops provided by Department of Human Services.

8.11 Fair and Equal Access Housing:
The Contractor agrees to ensure fair and equal access to housing by adhering to the following guidelines regarding client eligibility and intake procedures:

• County residency will not be a condition of occupancy. Last permanent address will have no bearing on program eligibility.
• Photo ID shall not be required.
• Intoxicated individuals or those who are under the influence of drugs may be admitted to the program, but may be ask to exit the program if the safety of others is compromised.
• “Families” are defined as a group of two or more people residing together, whether they are related or unrelated. Shelters that accept families must accept units that self-identify as families—proof of blood or legal relation cannot be required. [24 CFR 5.403]
• The age and gender of a child under age 18 will not be used as a basis for denying any family’s admission. [24 CFR 576.102(b)]
• Marital status shall not be a basis for discrimination. Projects that accept couples must accept unmarried couples. [24 CFR 5.105(a)]
• Sexual orientation will not be a basis for discrimination. Projects that accept couples must accept same-sex couples. [24 CFR 5.105(a)]
• A criminal record (including sex offenses and violent crime) will not be a basis for discrimination. The only exception shall be if there is in residence, at that housing, at least one family with a child under the age of 18. [24 CFR 5.105(a)]
• Participation in services/treatment will not be a condition of occupancy, except in the case of designated drug-treatment residential facilities. [24 CFR 576.400(e)2]

8.12 Homeless Participation:

Contractor agrees to ensure homeless participation in the CoC program through the following:

• Providing for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Continuum of Care Grant (CoC); and
• To the maximum extent practicable, involving homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under CoC, in providing services assisted under CoC, and in providing services for occupants of facilities assisted under CoC. This involvement may include employment or volunteer services.
8.13 Residency Requirement:

The Contractor shall provide available services to individuals and families who are eligible to receive services provided by this contract. Eligibility to receive service will not be dependent on whether a client’s last known permanent address was within the St. Louis County limits.

All referrals for emergency shelter, permanent housing or other services will be in accordance to the St. Louis County Continuum of Care Homeless System Front Door Assessment Process.

8.14 Monitoring Requirements:
All Contracts will be monitored by the Department of Human Services to ensure fiscal and programmatic compliance by the Contractor with city, state and federal rules and regulations.

8.15 Budget:
Contractor agrees to expend funds and request reimbursement according to the budget for the period of October 1st, 2017 through September 30th, 2018. (Attachment A). All amendments to this budget must be approved by the Manager of the Homeless Services Division. Budget amendment must be submitted two (2) months prior to the required date of change and must include complete supporting documentation. One (1) budget amendment per one (1) contract year is allowable. Any budget amendment amount greater than 10% of the total grant award or of significant change of financial/programmatic needs to be approved by HUD.

8.16 Sanctions:
Contractor shall be in default of this contract for any use of grant funds for a purpose other than as authorized by the applicable Federal, State and local regulations. Upon due notice to the Contractor of the occurrence of any such default and the provision of a reasonable opportunity to respond, The County may take one or more of the following action:

- Issue a letter of warning advising the Contractor of the default, establishing a date by which corrective actions must be completed and putting the Contractor on notice that more serious actions will be taken if the default is not corrected or is repeated; or
- Direct the Contractor to establish and maintain a management plan that assigns responsibilities for carrying out remedial actions; or
- Direct the Contractor to suspend, discontinue or not incur cost for the affected activity; or
- Reduce or recapture the grant; or
- Direct the Contractor to reimburse the program accounts for cost inappropriately charged to the program; or

Other appropriate action including, but not limited to, any remedial action legally available, such as affirmative litigation seeking declaratory judgment, specific performance, damages, temporary or permanent injunctions and any other available remedies.

8.17 Contingent Fee: Proposer warrants that no agreement has been made with any person or agency to solicit or secure this Agreement upon an understanding for a gratuity, percentage, brokerage or contingent fee in any form to any person excepting bona fide employees of Proposer or bona fide established commercial or sales agencies. For breach of this Warranty County may by written notice terminate the right of the Proposer to proceed under this Agreement, and will be entitled to pursue the same remedies against the contractor as it could pursue in the event of a breach of this Agreement. As a penalty in addition to any other damages to which it may be entitled to by law. County may recover exemplary damages in an amount to be determined by the County, which amount will not be less than three (3) nor more than ten (10) gratuity, commission, percentage, brokerage or contingent fee. The rights and remedies of County as provided in this Paragraph will not be exclusive and are in addition to any other rights or remedies as provided by law.

8.18 Drug Free Work Place:
The Contractor agrees to comply with the requirements of the Drug-Free Workplace Act of 1988 (P.L. 100-690, Section 5151 through 5160).

8.19 Contract Management:
All inquiries, problems or concerns related to this contract as a whole, shall be directed to the Homeless Services Program Manager.

8.20 No Assignment Contract:
The Contractor in the submission of their bid may identify that services under this contract would be provided by collaborating partner agencies. Contractor shall not assign any additional interest in the contract, nor transfer any interest in this contract without the prior written consent of the County. The County shall not assign any interest in this contract and shall not transfer any interest in this contract (whether by assignment or novation) without the prior written consent of the Contractor.

8.21 Funding Acknowledgement/Right to Review
A. The Contractor and its sub recipients shall identify the source of funding for the services provided under this Contract in all publicity about the services, including all material published about the Contract and on all equipment purchased for the services (if applicable). Any publications, printed materials or oral presentations describing this project must include the statement: “This project is funded wholly or in part by St. Louis County Department of Human Services and HUD.” The Contractor shall agree to display the St. Louis County and St. Louis Continuum of Care Logo and any appropriate HUD Logo in a prominent location in the facility.

B. The County reserves the right to review any printed materials and/or description about this contract or the program for any purpose.

C. All Financial and Activity Reports relative to this contract must be maintained and available for audit and review by the County, Federal Grants Section of the Comptroller’s Office and independent auditors with or without prior notice.

8.22 Contract Fees: The fees quoted by the successful Proposer shall remain firm during the contract term.
SECTION 9 ATTACHMENTS:

Attachment A must be completed in full and returned with the completed proposal.

Reimbursement Request Due Date:
The first reimbursement request must be submitted by the 15th of the following month from the first day of the contract period.

Project Budget Request:
Examples are listed. The budget categories must be customized, as needed for each. Include a separate budget for each component of funding in which you are applying (i.e. Transitional Housing, Rapid Rehousing and Permanent Supportive Housing). CoC requires a 25% match.

ATTACHMENT A—PROJECT BUDGET
Please provide a one page budget narrative to include explanation of each line item.

<table>
<thead>
<tr>
<th>Itemized Line Item</th>
<th>Total Budget</th>
<th>Grant Request (75%)</th>
<th>Match (25%) State the Match Name</th>
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<tbody>
<tr>
<td>Example: Sally Smith, Case Manager, .5FTE</td>
<td>$5,000</td>
<td>$3,750</td>
<td>$1,250</td>
</tr>
<tr>
<td>Program Staff</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Food</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transportation—Bus Passes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shelter Operations</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Match Only: Volunteer Hours</td>
<td>0</td>
<td>0</td>
<td>($10/hr. x # of hours)</td>
</tr>
</tbody>
</table>

20
ATTACHMENT B - FISCAL COMPLIANCE

1. Is your agency not-for-profit? ______ If the answer is “no”, stop here. You are not eligible to apply.

2. Does your agency have a current Fiscal Policy and Procedures Manual in place? _____________________________

3. Are the accounting systems computerized or manual? _____________________________
   If computerized, are they mainframe or software such as Quick Books? _____________________________

4. Do you have an audited financial statement for the last completed fiscal year? ________ if yes, attach as per the checklist on the last page. If not, please explain.

5. How many people are on your accounting staff? ________ Please list the title and the amount of time spent on accounting for the grant funds, particularly if they perform other non-accounting functions. Attach a separate page if necessary.

6. What approximate percentage of your total budgeted revenue is from Federal Funds _____ State Funds _____ Local Funds ________ Donations ________ Contributions ________?

7. Does your agency have a written cost allocation plan in place? ________ If yes, how often is the cost allocation plan updated? _____________________________

8. If your agency has multiple funding sources, do you have time sheets that reflect these various sources? ________ Are payroll costs allocated based on actual hours and not budgeted hours to the various funding sources? ________

9. Please list your sources for match and attach to this sheet award letters or letters of intent.

10. Please describe the projected rate at which awarded funds will be expended.

11. Do you have an inventory system? ________

12. Is your payroll done internally or by an outside agency? _____________________________
1. Are your agency’s services accessible to persons with disabilities?

   Yes [ ]  No [ ]

   Is your facility accessible to persons with disabilities?

   Yes [ ]  No [ ]

   If your facility or services are not accessible, you must explain how you will serve persons with disabilities. Limit narrative to one page, and attach as 13a.

2. Has your agency adopted a formal process for termination of assistance, including a grievance procedure?

   Yes [ ]  No [ ]

   If yes, attach the grievance procedure as page 13b. Note: before entering into a contract with the Department of Human Services, you must have a formal process for termination of assistance and a grievance procedure in place.

3. Do you provide services to victims of family violence?

   Yes [ ]  No [ ]

   If yes, please discuss the procedures your agency has in place to ensure the confidentiality of client records and client location. Limit narrative to one page, and attach as 13c.

4. Does your agency have any persons who are homeless or formerly homeless currently serving as board members or advisors in any of the programs operated by your agency? Do you have any current employees who are formerly homeless?

   Yes [ ]  No [ ]

   If yes, indicate their position as board member [ ] advisor [ ] employee [ ].

   If No, you must have a formal plan in place indicating how you will involve them in your agency’s program(s) before entering into a contract with the Department of Human Services. Attach narrative as page 13d.

5. Please attach your agency’s Board-approved Client Confidentiality Policy and all client Release of Information Forms. Attach as pages 11 a, b, c, etc.
ATTACHMENT D—AUTHORIZED SIGNATURE FORM

ATTACHMENT D
AUTHORIZED SIGNATURES

List the name and title of those individuals in your organization who are authorized to execute proposals, contracts, and other documents and/or instruments on behalf of the organization. Specify if more than one signature is required.

<table>
<thead>
<tr>
<th>Name (Typed)</th>
<th>Signature</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td>Name (Typed)</td>
<td>Signature</td>
<td>Title</td>
</tr>
</tbody>
</table>

The undersigned, being duly sworn, deposes and says that the foregoing is a true statement of facts concerning the individual, corporation, co-partnership or joint venture herein named, as of the date indicated:

Name of Firm - Be Exact

Sworn to before me this day of ________________________,

Notary Public

Authorized Signature(s)

Corporate Seal(s)

Notary Seal
ATTACHMENT E
E-VERIFY IMMIGRATION LAWS AFFIDAVIT IN EXCESS OF $5000.00
INSTRUCTIONS FOR COMPLIANCE WITH SECTION 285.530(2) R.S. Mo.

Missouri Revised Statutes Section 285.530(2) requires recipients of St. Louis County contracts in excess of $5,000 to provide an affidavit and documentation showing that the contracting party participates in a federal work authorization program with respect to employees working on the contracted services:

As a condition for the award of any contract or grant in excess of five thousand dollars by the state or by any political subdivision of the state to a business entity, or for any business entity receiving a state-administered or subsidized tax credit, tax abatement, or loan from the state, the business entity shall, by sworn affidavit and provision of documentation, affirm its enrollment and participation in a federal work authorization program with respect to the employees working in connection with the contracted services. Every such business entity shall also sign an affidavit affirming that it does not knowingly employ any person who is an unauthorized alien in connection with the contracted services. Section 285.530(2) R.S.Mo.

Business Entities:
Pursuant to 285.530(2) R.S.Mo., business entities awarded St. Louis County contracts in excess of $5,000 must affirm their enrollment and participation in a federal work authorization program with respect to the employees working on the contracted services by:

(1) Submitting a completed, notarized copy of the WORK AUTHORIZATION AFFIDAVIT FOR BUSINESS ENTITIES form, and
(2) Providing documentation affirming the business entity’s enrollment and participation in a federal work authorization program (see below) with respect to the employees that are working in connection with the contracted services.

A Federal work authorization program is an electronic verification of work authorization program or any equivalent federal work authorization program operated by the United States Department of Homeland Security. The E-Verify program is an internet-based work authorization program and is a widely-used worker verification program offered by the Department of Homeland Security.

Information on the E-Verify program can be found at www.uscis.gov/e-verify or at www.uscis.gov/portal/site/uscis by clicking on the E-Verify icon on the left side of the screen. The E-Verify Memorandum of Understanding ("MOU") can be found at www.gov/files/nativedocuments/MOU.pdf.

Acceptable documents to show enrollment and participation in the E-Verify program consists of the following two pages of the E-Verify Memorandum of Understanding (MOU): 1) a valid, completed copy of the first page identifying the employer, and (2) a valid, completed copy of the signature page signed by the employer and the Department of Homeland Security – Verification Division.

Individuals or Sole Proprietorships

Pursuant to 208.009 R.S.Mo., no alien who is unlawfully present in the United States shall receive any contract from local governments, including St. Louis County. Accordingly, individuals or sole proprietorships awarded any contract with St. Louis County must complete a WORK AUTHORIZATION CERTIFICATION FOR INDIVIDUALS form and choose one of the three options listed. The required documents must be attached to the form indicating which option you choose in order to show compliance with Section 208.009 R.S.Mo. If you choose option two (#2), then you must also complete and return a WORK AUTHORIZATION AFFIDAVIT FOR INDIVIDUALS form.

Failure to Comply:
Compliance with Section 285.530(2) R.S.Mo. is required for any contract with St. Louis County in excess of $5,000. If a business entity that is awarded a contract does not complete and return the required documents and/or affidavits to St. Louis County as part of the contract, this failure will be deemed a breach of the terms of such contract. St. Louis County, Missouri has the right to refuse to honor any contracts or orders, both present and future, with any business entity that does not provide the affidavits and/or documents required by 285.530(2) R.S.Mo. to St. Louis County. Pursuant to Section 208.009 R.S.Mo., no contract for any amount shall be awarded to any individual by St. Louis County without documents showing proof of that person’s citizenship or lawful presence, or by individual affidavit averring to the individual’s citizenship or lawful presence in the United States.
WORK AUTHORIZATION AFFIDAVIT FOR BUSINESS ENTITIES
PURSUANT TO 285.530 RSMo.
(FOR ALL CONTRACTS IN EXCESS OF $5,000.00)

County of ___________ )
)SS.

State of ___________ )

My name is __________________________ (title) of __________________________ (name of business). I am the
________________________________ (name of business). I am authorized to make this affidavit and have personal knowledge of the facts stated herein. I hereby affirm that
the aforementioned business is enrolled in and participates in a federal work authorization program operated by the
United States Department of Homeland Security with respect to all employees working in connection with this
contract. I have attached documentation to this affidavit to show enrollment and participation by the aforementioned
business in a federal work authorization program, as required by Section 285.530 R.S.Mo. In addition, I affirm that
this business does not knowingly employ any person who is an unauthorized alien in connection with the work on
this contract.

Further, Affiant sayeth not.

________________________
Signature of Affiant

________________________
Printed Name

________________________
Title

Subscribed and sworn to before me this ___ day of __________, 20___.

________________________
Notary Public

(Attach documentation of enrollment/participation in a federal work authorization program)
ATTACHMENT F
EXCEPTIONS TO SECTION 8

__ No exceptions are taken.

<table>
<thead>
<tr>
<th>Paragraph No.</th>
<th>Proposer's alternative language</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
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ATTACHMENT G – CHECKLIST:

Organize application pages as follows, numbering sequentially starting with the front page of this application as page 1. Please make sure section headings are bold.

__ Front page of the application (General Agency Information)
__ Table of Contents
__ Introduction and RFP and Timetable
__ Scope of Services
__ Director of Project
__ Project Budget & Budget Narrative (Attachment A)
__ Fiscal Compliance section (Attachment B)
__ Programmatic Compliance section (Attachment C)
__ Authorized Signature Form (Attachment D) (NOTE: this must be signed if you do not have one on file with St. Louis County OR if you have had a change in the authorized signatories)
__ E VERIFY IMMIGRATION LAWS AFFIDAVIT IN EXCESS OF $5000.00 (Attachment E)
__ Exceptions to Section 8 (Attachment F)
Price Proposal and Schedule (Attachment G)

Checklist (Attachment H)

Please attach the following to the original only in the order given below; do not number the following:

- Evidence of 501(c) (3) status
- Articles of Incorporation
- By-Laws
- List of Board of Directors and Officers
- 2015 Audit or Q4 2016 Financial Statements and Balance Sheet, if 2015 Audit is not complete.
- Proof of General Liability Insurance
### Evaluation of Proposals:
As part of the selection process, the following scoring criteria will be used to evaluate proposals.

#### Continuum of Care Grant Scoring Criteria

##### General Information

<table>
<thead>
<tr>
<th>Score</th>
<th>Criteria</th>
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<tbody>
<tr>
<td>0-15 pts</td>
<td>All required documents submitted and submitted on time</td>
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<tr>
<td>0-5 pts</td>
<td>Priority Housing Service.</td>
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##### Alignment with Opening Doors

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<tr>
<th>Score</th>
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<tbody>
<tr>
<td>0-3 pts</td>
<td>Project dedicates beds for persons experiencing chronic homelessness.</td>
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<tr>
<td>0-1 pts</td>
<td>Project prioritizes beds for persons experiencing chronic homelessness</td>
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<tr>
<td>0-12 pts</td>
<td>Project serves a priority population (Chronic, Families with children, Youth 16-24, Vets, Medically Frail).</td>
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<td>0-3 pts</td>
<td>Project demonstrated commitment to participate in Coordinated Entry system, use standardized assessment tool selected by CoC, and comply with Coordinated Entry policies and procedures.</td>
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##### Experience

<table>
<thead>
<tr>
<th>Score</th>
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<tbody>
<tr>
<td>0-10 pts</td>
<td>Experience of applicant working with the proposed population and in providing housing similar to the proposed in the application.</td>
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<tr>
<td>0-22 pts</td>
<td>Commitment to Housing First practices.</td>
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<td>0-5 pts</td>
<td>Experience in effectively utilizing funds including HUD grants and other public funding.</td>
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##### Design of Housing and Supportive Services

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<tr>
<td>0-15 pts</td>
<td>Extent to which applicant demonstrates ... a. Understanding of need of clients to be served b. Type, scale and location fits the need of clients c. Type and scales of supportive service to meet the needs of clients d. How clients will be assisted in obtaining mainstream resources e. Establishes performance measures for housing and income that are objective, trackable and meet or exceed HUD and CoC benchmarks</td>
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<td>Service Type</td>
<td>Rapid Re-Housing</td>
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<tr>
<td>Service Type</td>
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# CoC FY 2017 Scoring Sheets
## Ranking and Review

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<th>Permanent Housing</th>
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Rank and Review Process:

The Rank and Review Committee (RRC) met on 8/29/2017 to review both renewal and new project requests. Using a scoring tool for each type of project which considered: housing type, population served, experience (new only), program design (new only), timeline for implementation (new only), performance measure achievement (renewals only), fund utilization (renewals only), and involvement in the CoC.

The RRC made its recommendations to the CoC Executive Committee (EC), and the EC met on 9/15/2017 to review recommendations. The EC made its final decision on the rank and related funding decisions on renewal projects using data (performance measures and spending history) combined with CoC priorities to establish the final renewal project ranking. New proposals were also reviewed by the EC for consistency with CoC priorities to create the final ranking. In each case, decisions by the RRC and EC were data-driven.

Reallocation decisions were made based on the previous spending history of two permanent housing projects (PH) that failed to expend their full grant awards in previous years. The RRC reviewed expenditures for FY15 and FY16 to adequately consider each project’s ability to fully spend future grant awards. The committee recommended funds be recaptured from the projects over concern the spend down problems would continue if funding continued at current levels. Reallocation amounts should not adversely affect the number of clients each project is able to serve.

NO PROJECTS WERE REJECTED
Saint Louis County, Missouri
Homeless Management Information System

Governance Charter
Introduction
This governance charter is established to identify the roles and responsibilities of the Continuum of Care, the HMIS Lead and the HMIS Committee regarding the HMIS.

The Continuum of Care
The Executive Board of the Continuum of Care for St Louis County has the following HMIS related responsibilities:
- Designate an eligible applicant to serve as HMIS Lead and to manage the HMIS system
- Execute a formal agreement between the CoC and HMIS Lead that clearly defines the roles and responsibilities of each party
- Select an HMIS software solution that complies with HUD's data collection, management and reporting standards
- Provide oversight for key HMIS policies
- Work with the HMIS lead to ensure consistent provider participation
- Establish data quality benchmarks
- Ensure the quality of HMIS data

The HMIS Lead
The CoC has designated Institute for Community Alliances (ICA) as the HMIS Lead. Its key responsibilities in this role are to:
- Ensure that there are written Policies and Procedures for operation of the HMIS
- Enter into written participation agreements with each organization contributing data to the CoC's HMIS
- Oversee the day to day administration of the HMIS system through the HMIS System Administrator
- Provide technical support to participating agencies through the HMIS System Administrator
- Monitor participating agencies for compliance with HMIS Policies and Procedures
- Monitor updates to HUD Guidelines and communicate such to HMIS Committee
- Provide reports to the HMIS Committee and Executive Board relating to outcomes and established data quality benchmarks

The HMIS Committee
The HMIS Committee is made up of CoC representatives, the HMIS Lead and representatives of HMIS participating organizations.
- The HMIS Committee makes recommendations to the CoC on HMIS policies and procedures
- Regularly reviews data quality reports
- Supports and protects the rights and privacy of clients
- Contributes to strategic planning for HMIS growth.
- Members of the HMIS Committee will serve as representatives on regional HMIS committees as is necessary or desired.
HMIS Policies and Procedures

To the extent that any part of the Continuum of Care’s HMIS Policy and Procedure Manual is found to conflict with applicable state or federal laws or regulations, then the HMIS Lead will work to amend the section(s) to resolve the conflict.

The HMIS Lead may also identify policy and/or procedures to be amended based on operation of the system. If the HMIS Lead identifies policies and/or procedures that need to be amended:

- The HMIS Committee may/shall designate a specific committee or workgroup to explore the concern and to develop a recommendation for consideration by the full HMIS Committee
- While a single committee may be identified as the primary entity generally responsible for overseeing the Policy and Procedure Manual, another committee may be designated to explore a specific concern/recommendation
- Proposed revisions must be presented to and approved by the Continuum of Care Executive Board. After approval, a list of all revisions, including the date revised and a brief description of the change, will be incorporated into the HMIS Policy and Procedures Manual and listed in the manual’s Table of Contents

Charter Amendments

This governance charter shall be reviewed at least annually, but may be amended and updated at any duly called meeting of the Continuum of Care.

By: [Signature]
Chair, Executive Board of the St Louis County Continuum of Care

By: [Signature]
Institute for Community Alliances
St. Louis County Continuum of Care
BYLAWS

ARTICLE I: ORGANIZATION

Section 1: Name

The name of the organization is the St. Louis County Continuum of Care (CoC).

Section 2: Geographic Area

The geographic area served is St. Louis County, Missouri.

Section 3: Address

The principal address for the CoC is the office of the St. Louis County Department of Human Services, Homeless Programs Division, 9666 Olive Boulevard, Suite 510, St. Louis, MO 63132.

ARTICLE II: VISION, MISSION, AND PURPOSE

Section 1: Vision

The St. Louis County CoC envisions a community in which every person deserves and has access to safe, habitable, stable, and appropriate housing.

Section 2: Mission

The St. Louis County CoC seeks to prevent, reduce, and end homelessness through the effective planning and coordination of a community-wide response to homelessness that includes a full menu of prevention resources; supportive services; and emergency, transitional, and permanent housing options.

Section 3: Purpose

The purpose of the St. Louis County CoC is two-fold: (1) to carry out the responsibilities of a Continuum of Care as defined by legislation and the U.S. Department of Housing and Urban Development (HUD) and (2) to ensure that the community response to homelessness considers factors beyond the responsibilities required legislatively and by HUD so that the unique needs of our community are addressed. Responsibilities of the CoC include but are not limited to the following:

1. To establish and operate a centralized or coordinated system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services;
To ensure that the centralized or coordinated assessment system is easily accessed by individuals and families seeking services; is well advertised; includes a comprehensive and standardized assessment tool; and follows fair and equitable written standards for screening, determining eligibility, and administering assistance;

3. To coordinate and implement a system to identify and meet the needs of those experiencing or at-risk of homelessness within the geographic area, including-

- planning for and conducting point-in-time counts of homeless persons within the geographic area;
- conducting an annual gaps analysis of the homeless needs and services available within the geographic area;
- providing information necessary to complete the Consolidated Plan(s) submitted to HUD for the geographic area; and
- consulting with State and local Emergency Solutions Grant (ESG) program recipients within the CoC on the plan for allocating ESG program funds and reporting on and evaluating the performance of ESG program recipients and subrecipients;

4. To designate a Homeless Management Information System (HMIS) and a lead agency to manage the HMIS;

5. To prepare and oversee the application of Continuum of Care grant funds from HUD and other applications for funding as appropriate. Preparation and oversight activities include the following-

- designing, operating, and following a collaborative process for the development of applications, as well as approving the submission of applications in response to a NOFA published by HUD;
- establishing priorities for funding projects within the geographic area;
- determining how many and which applications will be submitted;
- selecting a Collaborative Applicant to submit an application on behalf of the St. Louis County CoC; and
- establishing a clearly defined set of responsibilities for both the CoC and its designated Collaborative Applicant related to the application of CoC and other grant funds.
6. To assist in the coordination of other funding resources - federal, state, local, or private - of targeted homeless programs and other mainstream resources.

**ARTICLE III: MEMBERSHIP**

**Section 1: Membership Composition**

Membership in the St. Louis County CoC will be composed of individuals and agencies concerned with the development and coordination of homeless assistance and prevention programs. Membership is open and will include, but not be limited to the following:

- Nonprofit homeless providers,
- Victim service providers,
- Faith-based organizations,
- Governments,
- Businesses,
- Advocates,
- Public housing agencies,
- School districts,
- Social service providers,
- Mental health agencies,
- Hospitals,
- Universities,
- Affordable housing developers,
- Law enforcement,
- Organizations that serve homeless and formerly homeless veterans, and
- Homeless and formerly homeless individuals.

**Section 2: Membership Defined**

Membership in the St. Louis County CoC is open to any organization or individual that is committed to preventing, reducing, and ending homelessness.

- Organizations include nonprofit, for profit, governmental, and faith-based entities.

- Individuals include persons who are not affiliated with any organization within the CoC. An individual is considered affiliated with an organization if he/she is employed by, on the board of directors of, an active volunteer with, or a member of the organization. Individual members may include persons who are currently or formerly homeless.

Initial membership in the CoC will be determined by an individual's or organization's attendance at monthly meetings of the Homeless Service Network Board/Coe for the 18 months prior to the date of the enactment of these bylaws. Agencies and individuals who attended at least 50% of Homeless Service Network Board/Coe meetings in the previous 18 months will be considered active members of the CoC. Individuals and organizations must also complete an application for membership that includes the names of authorized delegates who may vote on behalf of the organization.

Individuals and organizations that wish to join the CoC after the enactment of the bylaws must also complete an application for membership and attend CoC meetings for six consecutive months following the submission of said application. Upon verification of meeting these requirements by the Secretary of the CoC, the individual or organization seeking membership
will be considered an active member of the CoC and will be entitled to all the rights and
privileges thereof.

To remain an active member in good standing with the CoC, an individual or organization must
meet the following criteria:

- Attend 75% of the meetings of the full Continuum of Care each calendar year. Initially, the
  full CoC will meet monthly with the frequency of the meetings to be reviewed and
decided upon at least annually by the Executive Committee of the CoC. In no instance
shall the number of meetings of the full CoC be less than four times per year.

- Participate in at least one standing committee of the CoC and attend 75% of applicable
  committee meetings each calendar year. See Article VI, Section 2 for a description of
  CoC standing committees.

When absences occur due to illness, hardship or other unavoidable circumstance, exceptions may
be made on a case-by-case basis to the attendance requirements for membership at the discretion
of the Executive Committee. Exceptions shall require approval by a simple majority of the
members present at any Executive Committee meeting in which a quorum is present. See Article
IV, Section 2 for the definition of quorum for the purposes of the Executive Committee.

ARTICLE IV: OFFICERS AND EXECUTIVE COMMITTEE

Section 1: Officer Positions

Three officers will coordinate the work of the CoC: Chair, Vice Chair, and Secretary.

Section 2: Executive Committee

The Executive Committee shall be comprised of the Chair and Vice Chair of the CoC; the Chairs
of the CoC Standing Committees described in Article VI, Section 2 of these bylaws; no more
than eight at-large members selected from the active membership of the CoC; the Manager of the
Homeless Services Program of the St. Louis County Department of Human Services; and, in the
event that St. Louis County is not designated as the Collaborative Applicant, a representative of
the entity serving as Collaborative Applicant for the Continuum of Care. The Secretary shall
also serve on the Executive Committee but shall not have a vote.

At-large positions on the Executive Committee are intended to create opportunities for balanced
representation of consumers, service providers by types and populations served, and other
community partners. The Executive Committee shall, on an annual basis, evaluate the
composition of the Committee and make recommendations regarding the types of individuals or
entities to be targeted for nomination to the Committee as openings arise.

A simple majority of Executive Committee members must be present to constitute a quorum for
voting purposes.

Section 3: Nomination, Election, and Appointment
The CoC will nominate and recommend to the committee a slate of candidates for the Chair and Vice Chair positions of the CoC as well as the three at-large positions on the Executive Committee. Only individuals who are active members of the CoC and persons representing organizations that are active members of the CoC may be nominated for these positions. The positions will be voted on by the full, active membership of the CoC every two years at the December meeting.

The position of Secretary shall be filled by appointment with a staff member from the St. Louis County Department of Human Services. The Manager of the Homeless Programs Division of the Department of Human Services shall be responsible for making this appointment. The Secretary shall serve at the pleasure of the Manager of the Homeless Programs Division.

Should the Chair or Vice-Chair resign or be removed from the CoC before completing a term of office, the Executive Committee will appoint a member from the committee to finish the term of office. In the event that the Vice-Chair is appointed to replace the Chair due to the Chair's resignation or removal or if the Vice-Chair is elected to succeed the Chair after expiration of the Chair's term, the Vice-Chair position shall be filled via an election and shall not be appointed by the Executive Committee.

Should an at-large member of the Executive Committee resign or be removed from her/his position on the Executive Committee, the Executive Committee will appoint an active member of the CoC to finish the term.

Appointments shall require approval by a simple majority of the members present at any Executive Committee meeting in which a quorum is present.

Section 4: Terms of Service

Officers shall be elected for a two-year term except that the Vice Chair shall initially be elected for a one year term to allow for staggering of the terms of the Chair and Vice Chair. Upon expiration of the initial term, the Vice Chair will be elected for a two-year term.

Section 5: Duties

Chair

The Chair of the CoC is responsible for scheduling and facilitating meetings, preparing meeting agendas, notifying members of upcoming meetings, and overseeing all business conducted by the CoC. The Chair of the CoC shall also serve as the Chair of the Executive Committee.

Vice Chair

The Vice Chair will assist and support the Chair in the completion of her/his duties. The Vice Chair will facilitate meetings of the CoC in the event that the Chair is unable to attend. In the event that the Chair is unable to temporarily fulfill her/his duties due to illness, medical or family
leave, or other temporary circumstance, the Vice Chair will assume the Chair's responsibilities until her/his return. Should the Chair, for any reason, be unable to complete a term of office then the Vice Chair will assume the position of Chair and a new Vice Chair will be appointed by the Executive Committee to complete the term.

In the absence of the Secretary at any meeting of the CoC, the Vice Chair will serve as Secretary. In the absence of both the Chair and the Secretary, the Vice Chair will appoint a CoC member in attendance to serve as Secretary for the meeting.

Secretary

The Secretary will ensure that all minutes of meetings and records of the CoC and its committees are compiled and preserved. The Secretary is responsible for sending a draft of minutes from the most recent meeting to CoC members at least five business days prior to the next meeting of the CoC to ensure that members have adequate time to review before approving or recommending revisions at the upcoming meeting.

The Secretary will maintain records of attendance for all CoC meetings and will call roll of active members for any items up for vote during meetings.

ARTICLE V: MEETINGS AND VOTING

Section 1: Meetings

Regular meetings of the CoC will convene on the first Wednesday of every month at 8:30 a.m. Meetings cancelled due to inclement weather or other circumstance will be rescheduled at the discretion of the CoC Chair. The Chair may convene additional meetings as needed to conduct business necessary to achieve the mission and purpose of the CoC.

Section 2: Voting

Organizations

Each active member organization shall be entitled to an unlimited number of delegates, but an organization shall have only one vote. Only active members of the CoC will have voting privileges.

Nonprofit, For Profit, and Faith-Based Entities

If two active member organizations are closely linked but organized separately for IRS tax purposes, then each organization is entitled to its own vote. Organizations operating under the same umbrella for IRS tax purposes are entitled to only one vote. (e.g. If all programs and organizations operating under the Catholic Charities umbrella utilize the same 501c3, then Catholic Charities and its related entities are entitled to only one vote. However, if each of the entities under the Catholic Charities umbrella of organizations maintains a separate 501c3 then each agency is entitled to its own vote.)
Local, State, and Federal Government Entities

Active members from local, state, or federal government entities who represent different departments within the applicable level of government shall be entitled to one vote per department; however, subdivisions or programs within the same department will not be recognized for individual voting rights (e.g. The St. Louis County Department of Human Services includes the Veteran’s Programs, Homeless Programs, Residential Programs, etc. The Department of Human Services could have delegates on the CoC from each of these subdivisions/programs, but the Department would be entitled to only one vote. An unrelated department within St. Louis County Government such as the Police Department would also be entitled to its own vote but representatives from programs or subdivisions within the Police Department such as the Community Response Team or officers from different precincts would be considered delegates of the Police Department and would not be entitled to individual votes.)

Individuals

Active individual members, including those who are currently or formerly homeless, who are not affiliated with any organization within the CoC are entitled to one vote. An individual is considered affiliated with an organization if he/she is employed by, on the board of directors of, an active volunteer with, or a member of the organization.

Voting by Proxy

Any organizational member unable to be present at the time of a vote may send a representative of the organization to vote by proxy. Likewise, an individual member may also designate a proxy of her or his choosing to vote on her/his behalf. The Chair must receive written notification prior to the meeting be called to order to approve any vote by proxy.

Quorum

A simple majority of CoC members who are eligible to vote must be present to constitute a quorum.

Conflict of Interest

Each member of the CoC shall exercise good faith and honesty in all dealings and transactions related to the CoC.

No member shall use her/his position or knowledge gained from the CoC in such a Way as to permit a conflict to arise between the interest of the CoC and her/his own individual or organizational interest.

If a matter arises in which a member has, or may have, a conflict of interest, the situation shall be promptly disclosed to the Executive Committee of the CoC. The Executive Committee will vote
to determine whether or not a conflict or potential conflict exists and what action is needed to ameliorate the conflict when applicable.

Any member having a possible conflict of interest on any matter before the CoC may not use her/his personal influence with the CoC or its members. This requirement should not be construed as preventing a member from stating her/his individual or organizational position in the matter, nor from answering pertinent questions from other members.

No CoC member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents. Organizational members shall recuse themselves from any vote or ranking and review of applications for funding opportunities in which their own organization has an application under consideration.

Section 3: Removal of Members or Officers

Members or Officers of the CoC may be removed from the CoC and/or the office held for violating the conflict of interest provisions of the bylaws, engaging in activities or behaviors that are detrimental to the mission and purpose of the CoC, or for other good cause. Removal from the CoC requires a two-thirds majority vote of active members attending a regular or specially called meeting of the CoC convened by the Chair. A quorum must be present to vote on the removal of a member or officer.

ARTICLE VI: COMMITTEES

Section 1: Executive Committee

The Executive Committee is responsible for providing direction and leadership to the CoC in strategic planning and goal setting; establishing priorities for and making decisions regarding the use of funding for the CoC; approving recommendations of ranking and review committee; conducting business on behalf of the CoC in the event of an emergency, disaster, or imminent funding deadline; overseeing the election and appointment of officers and at-large members; and engaging in official communication and entering into agreements on behalf of the CoC.

The Executive Committee is also responsible for the selection and appointment of the CoC Collaborative Applicant and the HMIS Lead Agency. The organizations selected to serve as the Collaborative Applicant and HMIS Lead shall serve in their applicable roles for a period of two years except that the organizations first selected as the Collaborative Applicant and HMIS Lead will serve in this role for the duration of the contract period for the CoC application submitted to HUD in January 2014.

Section 2: Standing Committees

The Standing Committees of the CoC are as follows:
Planning Committee

The Planning Committee will be responsible for the development of strategic goals and objectives for the CoC. The committee will research and develop effective policies, practices, and service delivery strategies within the CoC. This includes the development of a Centralized or Coordinated Assessment System. The committee will review current homeless data and trends, conduct gaps analysis surveys, assess progress toward meeting goals and objectives, and make recommendations regarding the use of resources.

Point-In-Time Count Committee

The Point-In-Time Count Committee will plan and coordinate the census counts of sheltered and unsheltered homeless persons required by HUD.

HMIS Committee

The primary role of the HMIS Committee will be to direct the activities of the HMIS Lead Agencies and oversee the development and adoption of new policies governing the operation of the HMIS within Saint Louis County. This includes the development of written protocols for monitoring of CoC-funded program performance, including participation in HMIS. The committee will approve the implementation of recently created data quality and security plans, and will be responsible for the review of HMIS monitoring reports presented by the HMIS Lead Agency. The committee will be comprised of CoC members representing each of the program types operating within the continuum.

Ranking and Review Committee

The Ranking and Review Committee will evaluate applications for funding administered by the Homeless Programs Division of the St. Louis County Department of Human Services. The committee will develop instrumentation and procedures to ensure a fair and unbiased review of funding applications that takes into consideration the guidelines and priorities established by HUD and other funders. The committee will ensure that proposed projects meet eligibility criteria for funding and will rank and prioritize applications. The committee will submit its recommendations to the Executive Committee for approval.

Membership Committee

The Membership Committee is responsible for recruiting and retaining a diverse slate of individuals and organizations for membership in the CoC. The committee will ensure that membership composition in the CoC reflects the requirements outlined by HUD and detailed in Article III, Section 1 of these bylaws. Special attention will be given to the recruitment of individuals who are homeless and formerly homeless. The Membership Committee will also be responsible for creating and organizing meaningful opportunities for consumer feedback and input into the planning, delivery, and evaluation of services within the CoC.
Special Populations and Issues Committee

The Special Populations and Issues Committee will focus on identifying and addressing needs of and issues affecting specific subpopulations of individuals and families experiencing homelessness (e.g., homeless youth, school-age children, veterans, members of the LGBT community, survivors of domestic violence, etc.).

Directors' Policy Committee

This committee, whose members have historically been staff from the St. Louis County Department of Human Services and executive staff from County-funded agencies, serves as an opportunity for information sharing and planning related to CoC funding and policy. Participation in this committee is contractually required for agencies receiving HUD, Housing Resource Commission, and other funds that pass through the County. This committee will continue to meet for the duration of any existing contracts. Upon expiration of these existing contracts, the functions of the Directors' Policy Committee will be absorbed by the broader CoC and its Planning Committee.

Section 3: Ad Hoc Committees

Ad Hoc Committees will be convened as determined necessary by the general membership or Executive Committee of the CoC.

Section 4: Meetings and Membership

All individual and organization members of the CoC must actively participate, as described in Article III, Section 2 of these bylaws, in a Standing Committee of the CoC.

Members may self-select the committee(s) they wish to join. If voluntary membership in a particular committee is too low to adequately conduct the business required of said committee, the Executive Committee may vote to appoint members to said committee as needed.

All Standing Committees shall meet a minimum of four times per calendar year.

Each Standing and Ad Hoc Committee shall elect a Chair and Vice Chair who will organize and facilitate committee meetings and assist the committee in developing and achieving goals. Each committee Chair and Vice Chair shall be elected for a one-year term except that the term of the first Chair and Vice Chair shall last only from the date of election through the end of the calendar year in which elected. Subsequent elections for one-year terms will take place each January.

Committees shall keep records of membership, meeting minutes, and attendance. An updated membership list shall be submitted to the Secretary of the CoC quarterly on the last business day of January, April, July, and October. Meeting minutes and attendance records shall be submitted to the Secretary of the CoC within ten business days following each committee meeting.
ARTICLE VII: REVIEW AND AMENDMENTS TO BYLAWS

The Bylaws of the CoC may be revised, amended, or repealed with the approval of the majority of all voting-eligible members of the CoC. A vote to revise, amend, or repeal the bylaws may be taken up at any regular or specially called meeting of the CoC, provided that any changes shall have been presented in their final form and discussed at the preceding regular monthly meeting of the CoC. Notification for any such meetings must clearly state that the revision, amendment, or repeal of the bylaws is being considered.

The CoC shall review, update as appropriate, and approve the Bylaws at least once every five years.

Bylaws accepted by vote on: January 6, 2016

Chair Signature: [Signature]

Vice Chair Signature: [Signature]
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Appendices

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I. **Overview**
Regulations were issued by the United States Department of Housing and Urban Development for the Homeless Management Information System (HMIS) in 2004, 2010 and 2014. Compliance with this system is required of social services agencies receiving funds from the US Department of Housing and Urban Development, the US Veterans Administration and US Department of Health and Human Services. The 2014 Data Standards describe the types of data that agencies participating in a Continuum of Care must collect from clients receiving homeless services. These regulations allow for the uniform collection data clients across agencies and across jurisdictions. Additionally the rules protect privacy and confidentiality for clients.

The rules apply to agencies receiving Emergency Shelter Grants, Supportive Housing Program grants, Shelter plus Care grants, Section 8 SRO programs, HOPWA grants and other funders within the Continuum of Care. If your agency assists victims of domestic violence with specific programs, additional regulations will apply. Consult with your funding agency or an attorney for more information regarding collecting and using data regarding domestic violence victims.

Clients are required to provide the participating agency with their names and other personal information as a condition of obtaining services. An agency can decline to serve a client who refuses to provide personal information required in the HMIS system.

II. **Release of Information**
Except for first party access to information and any required disclosures for oversight of compliance with HMIS privacy and security standards, all uses and disclosures are permissive and are not mandatory. This means your agency should err on the side of not disclosing information you have collected, except to the extent the information must be in the database you are using. Uses and disclosures not specified in the privacy notice can be made only with the consent of the individual or when required by law.

III. **Client Notification**
You must post notification at each intake desk of your agency advising clients of the Privacy Notice. You must also provide the clients with the short version of the Privacy Notice (Appendix B) which advises them that they can request a copy of the full policy (Appendix A).

The agency must provide reasonable accommodations for persons with disabilities throughout the data collection process. This manual includes various versions of the Privacy Notice.
IV. Staff Training
All staff should be familiar with the requirements of the Privacy Notice. As part of the training, each employee and volunteer of your agency who collects, reads, or is otherwise exposed to client information must be given a copy of the full Privacy Notice, be allowed to read it, then must sign the Acknowledgment enclosed in this manual as Appendix H to confirm he or she has read and understood the policy.

V. Post on the Web Page
Your Privacy Notice should be posted on the agency's web page. If your agency's address is generally not published elsewhere on your web site, ensure that the address does not appear in the Privacy Notice before it is posted.

VI. Chief Privacy Officer
Your agency must designate a Chief Privacy Officer, who should be an administrator. The Chief Privacy Officer will manage questions and complaints about the Privacy Notice.

VII. Requests for Data by Law Enforcement and Government Agencies
Open Access
There are many situations in which police or other government officials request information from shelters and other service providers.

Police are not entitled to enter your agency's buildings without a court order, search warrant, or your permission.

Clients as Victims
It is advisable to allow police to enter your building when a client is the victim of a crime. It is appropriate to allow police to interview your client.

Court Orders and Warrants
There are limited circumstances in which police should be allowed enter to your agency in search of a person or information.

Your agency should comply with a court order which allows police entry to your agency.

Your agency should comply with a search warrant ordering access to your building. Ask to see the warrant, and identify specific items police are authorized to locate. A search warrant may also authorize law enforcement to look for a person in your agency. Officers may rightfully enter your agency and arrest the person named in the warrant.

An arrest warrant alone does not authorize police to enter your building. You are not required to allow entry or provide information to law enforcement officers.
when they do not present a court order, subpoena or search warrant. Many agencies have cooperative relationships with police. Voluntarily giving information to police can harm the trust relationship you have with clients.

Clients Suspected of Crime
Without a court order or warrant, you should not confirm that a certain client is at your shelter, and you should not provide any information about the person. Even if the person is wanted for a crime, law enforcement can arrest your client only when they possess a court order or search and arrest warrants.

If a client is wanted for a serious crime such as child abuse, murder, or other felony, you should consider advising the client to turn himself or herself in to the police. If he or she refuses, and you believe the crime is so serious that you should not be serving the client, you have the right to advise him or her to leave immediately, unless your program has leases for rental of housing. Programs that provide services and shelter, but not longer-term leases for individual housing units, can remove people from their premises without going through a court procedure.

Probation and Parole Officers
Very often, your clients may be on probation or parole for prior offenses. Probation and Parole officers have no special privileges allowing them entry into your agency’s buildings. They can enter your buildings with your permission or with a search warrant (with the police). While offenders consent to parole officers searching their homes when they are on parole, that consent does not apply to your agency’s premises.

Subpoenas
When your agency is served with a Subpoena for records, you must determine whether you are legally allowed to comply. In many cases, a subpoena seeks medical records or other information of a confidential nature. An attorney should be consulted. An attorney can file a Motion to Quash and a judge will determine whether the records must be produced. Usually, a subpoena would give you several days to comply. If you must appear in court or at a deposition before you can contact an attorney, you should state your objections to the subpoena in writing and provide them to the attorney or the court.

Refer questions about law enforcement requests to your attorney.

Hotel/Motel Program
Clients who stay in the hotel/motel program are affected by specific laws. Contact your attorney or local legal office for information.

Child Abuse and Mandatory Reporting
Certain service providers are mandated to provide credible evidence of child
abuse. This obligation would supersede any policy that would prohibit the reporting of child abuse. Mandatory reporters should comply with state guidelines for reporters.

VIII. HMIS Security Plan

The HMIS Lead is responsible for establishing a security plan, which must be approved by the Saint Louis County Continuum of Care. This security plan must address the areas of User access, data collection, maintenance, use, disclosure, transmission, destruction of data, and a communication plan for reporting and responding to security incidents. In addition to the security plan, the HMIS Lead must develop a Disaster Recovery Plan and verify that the HMIS Vendor has a Disaster Recovery Plan as well.

HMIS User Access
All users are required to sign a HMIS User Agreement and complete HMIS User Training before receiving access to the HMIS. Credentials will not be issued without a signed User Agreement being on file with the HMIS Lead and the HMIS Agency Administrator. All HMIS training participants will be given a copy of the HMIS User Agreement. Potential Users will be responsible for completing the User Agreement, obtaining the required signatures and returning the form to the HMIS Lead before User Credentials will be issued. Once all required paperwork is complete, User Credentials can be obtained by calling the HMIS Help Desk.

Establishing a New Partner Agency
Homeless service providers that are interested in obtaining access to the HMIS system will be required to first contact the HMIS Lead, who will process the request and engage the CoC as necessary.

Once the homeless service provider has been approved for access to the HMIS system, the New Partner Agency will receive a copy of an HMIS participation agreement to review and obtain the appropriate signatures. The HMIS participation agreement will be sent to the HMIS Lead. Once all agreements are finalized, the HMIS Lead will contact the new partner agency regarding obtaining access and new user training.

Data Access Policies
HMIS Users will receive a unique username and establish a password. Usernames and passwords are never to be shared, or documented in a visible or accessible location, which would compromise the integrity and security of the HMIS system. HMIS Users will automatically be prompted to change their HMIS password on a routine basis. If a password is lost or forgotten, the HMIS User should contact the HMIS helpdesk.

HMIS Users must log off the HMIS system or lock the computer any time they step away from the workstation. Automatic password protected screen savers, or network
log-off, should be implemented on each computer used for HMIS. Additionally, the HMIS system is set up to auto-log off users who are inactive on the site after a maximum of 10 minutes.

Any paper documentation, such as client authorization forms, should be filed in a locked, secure area and not left unattended. All paper and electronic documentation for any client in the HMIS system must be stored and maintained for a minimum of seven years.

IX. HMIS Privacy Plan

Data Collection Limitation Policy
Partner agencies will enter into the HMIS only client information deemed necessary to provide quality service. Partner agencies, in collaboration with the Saint Louis County CoC, will make a determination of what qualifies as essential for services.

Partner agencies reserve the right to decline services for clients choosing not to share information needed to confirm program eligibility. The agency assumes that, by requesting services from the agency, the client agrees to allow them to collect information and to use or disclose it as described in the privacy notice and otherwise as allowed or required by law.

Client Notification
Partner Agencies must post notification at each intake desk of the agency advising clients of the Privacy Notice (Appendix A). Clients must also be provided with the short version of the Privacy Notice (Appendix B) which advises them that they can request a copy of the full policy.
The HMIS Privacy Notice should be posted on the agency's web page. Agency should ensure that the address does not appear in the Privacy Notice before it is posted on their website, if the address is not public knowledge.

In addition to the posted notification signs, any client who agrees to allow HMIS User access to their HMIS profile must sign a Client Authorization form. This form must be updated annually.
The agency must provide reasonable accommodations for persons with disabilities throughout the data collection process. Various versions of the Privacy Notice will be made available through the HMIS Lead.

Limitations of HMIS Use
Partner agencies will use and disclose personal information from HMIS only in the following circumstances:

1) To provide or coordinate services to an individual.
2) For functions related to payment or reimbursement for services.
3) To carry out administrative functions including, but not limited to legal, audit, personnel, planning, oversight or management functions.
4) For research, where identifying information has been removed.
5) Contractual research where privacy conditions are met.
6) To make a disclosure required by law, when the disclosure complies with and is limited to the requirements of the law. Instances where this might occur are during a medical emergency, to report a crime against staff of the agency or a crime on agency premises, or to avert a serious threat to health or safety, including a person’s attempt to harm himself or herself.
7) To comply with government reporting obligations.
8) In connection with a court order, warrant, subpoena or other court proceeding requiring disclosure.

Client Rights to Access and Request Correction of Files

Any client receiving services from a Partnering Agency has the following rights:

1) **Access to program records.** Clients have the right to review their records in a program in the HMIS. A written request should be made to the HMIS Agency Administrator, who should follow-up on the request within five working days.

2) **Access to full records.** Clients have the right to review their full record in the HMIS. They may make a written request through the HMIS Agency Administrator, who will request approval from the HMIS Lead within five working days.

3) **Correction of an HMIS record.** A client has the right to request corrections be made to his or her HMIS record to ensure information is accurate. This guarantees fairness in its use.

4) **Refusal.** A client has a right to refuse to provide personal information for inclusion in HMIS. The agency’s ability to assist a client depends on the documentation of certain private information, and service providers may decline to provide services to a client who refuses to provide this data.

5) **Agency’s Right to Refuse Inspection of an Individual Record.** The agency may deny a client the right to inspect or copy his or her personal information for the following reasons:
   i. information is compiled in reasonable anticipation of litigation or comparable proceedings;
   ii. information about another individual other than the agency staff would be disclosed;
   iii. information was obtained under a promise of confidentiality other than a promise from the provider and disclosure would reveal the source of the information; or
   iv. Information reasonably likely to endanger the life or physical safety of any individual if disclosed.

6) **Harassment.** The agency reserves the right to reject repeated or harassing requests for access or correction. However, if the agency
denies a client's request for access or correction, written documentation regarding the request and the reason for denial will be provided to the client. A copy of that documentation will also be included in the client record.

**Data Sharing**
At initial project intake, the client should receive verbal explanation and written documentation about utilization of the HMIS system for Saint Louis County Continuum of Care. If a client is willing to share information with HMIS, they must sign a Client Authorization form. Any information that will be shared, beyond what is covered by the Client Authorization for HMIS, will require additional written consents and release of information by the client.

The client does have the right to revoke written authorization at any time. Once the client has revoked their authorization, no new information may be utilized in HMIS but all historical data remains accessible by the provider.

All Partner Agencies are expected to uphold federal, state, and local confidentiality regulations to protect records and privacy. If an agency is covered by the Health Insurance Portability and Accountability Act (HIPAA), the HIPAA regulations prevail.

**Protected Agencies and Domestic Violence Agencies**
Protected agencies serve populations that require special security and privacy considerations. Populations include medically fragile, at-risk youth, and those served by Shelter+Care programs. Protected agencies contribute data to HMIS; however, the services provided by the agencies remain hidden beyond basic identification of clients.

Domestic violence agencies are prohibited from entering data into the HMIS. If domestic violence agencies receive CoC or ESG funding, they are required to have a comparable database, and the HMIS lead will work with agencies to ensure the databases meet standards. Agencies are required to report aggregate data for reporting purposes.

**HMIS Data Release Policy and Procedures**

**Client-Level Data:**
HMIS Users may access client-level data for their specified project only after completing appropriate client authorization. Client authorization is good for up to one year. After one year, only historical record information will be available for the project unless an updated client authorization is filed.

Client-level data may also be viewed by only the HMIS Lead and HMIS Vendor for purposes of compliance, software correction, data quality resolution, and other required tasks related to HMIS privacy, security, and data quality standards.

No identifiable client data are to be released to any person, agency or organization without written consent by the client, unless otherwise required by law.
Mandated Reporting
Mandatory reporters should comply with state guidelines for reporters. This obligation supersedes any agency policies that prohibit disclosure of identifying information.

Court-Ordered Subpoenas
There are many situations in which police or other government officials request information from shelters and other service providers. If an HMIS Partner Agency is served with a Subpoena for records, the agency must immediately contact the HMIS Lead and the Chair of the Executive Board of the Saint Louis County Continuum of Care. Once it is established the exact information requested in the subpoena, the Partner Agency and HMIS Lead will work in collaboration to gather the appropriate documentation. Due to the fact HMIS Partner Agencies have data sharing, it is vital to work with the HMIS Lead to only provide information from the listed Partner Agency requested in the subpoena.

Program-Level (aggregate) Data:
The HMIS Lead will supply the CoC Executive Committee a report analyzing program-level data on a quarterly basis. These quarterly reports will be utilized to help inform systematic practice for the Continuum of Care.

Agencies will be able to request access to aggregate-level data. The HMIS Agency Administrator will make requests through the HMIS Lead, who will outline appropriate use and dissemination of aggregated data. Training and support will be made available through the HMIS Lead. No individually identifiable client data will be reported in any of these reports.

Data Entry Policy: Agency/HMIS users will be responsible for the accuracy of their data entry. Missing data rates are expected to be kept below 10%. For housing programs, client entry and exit dates are expected to be recorded in a timely manner. Client entry dates are required to be entered with 24 hours of a client moving into housing. Client exit dates must be entered within 48 hours of the Client leaving housing.

Procedure: The Agency must maintain standards for periodically checking data for completeness, accuracy and timeliness. The CoC will also define and maintain a data quality plan to help all Agencies monitor data quality. The Systems Administrator will perform regular data quality checks using the Data Quality Plan. Any patterns of error will be reported to the Agency Administrator. When patterns of error have been discovered, users will be required to correct the data, data entry processes (if applicable) and will be monitored for compliance.
X. **HMIS Data Quality Plan**

It is ultimately the responsibility of the Saint Louis County Continuum of Care Executive Committee and HMIS Lead to ensure quality data is submitted to HUD. In an effort to direct service provisions in an effective and efficient manner and assist the Saint Louis County CoC in obtaining strategic goals, the HMIS Lead is responsible for setting Data Quality benchmarks and a Data Quality Plan (as approved by the Saint Louis County CoC).

HMIS Data Quality reviews of client-level data will be used by the HMIS Lead to monitor data quality and indicate possible additional trainings needed for improvement. HMIS Data Quality reviews of program-level data will be used by the HMIS Lead to report continuum-wide improvement suggestions, and recommendations for integrations with other mainstream and Federal Programming data. Program-level data quality may also be used by various Saint Louis Continuum of Care committees for system analysis and evaluations.

**Data Quality Standards and Monitoring**

- All data entered will be accurate.
- In all reports of shelter, housing or services provided for a client, the client must be eligible to receive the services from the listed provider.
- Universal data elements at minimum must be entered into the HMIS system within 24 hours of entry into a project and complete appropriate discharge within 48 hours of exit from a project.
- Per HUD data standards, blank entries in required data fields are not allowed.
- Entries of “client does not know” or “client refused” in required data fields will not exceed 10 percent required for CoC reporting.
- HMIS Agency Administrators will perform monthly data quality checks using the Data Quality Plan.
- Any patterns of errors identified by users will be reported to the HMIS Agency Administrator. When patterns of error have been discovered, users will be required to correct the data, data entry processes (if applicable) and will be monitored for compliance.
- Any pattern of error between Partner Agencies should be reported to the HMIS Lead.

**Data Collection Requirements**

Partner Agencies are responsible for completing, at minimum, the HUD defined Universal Data Elements (UDE’s) and any HUD Program-specific Data Elements required for the agency’s project. Partner Agencies may also be required to collect data elements determined by the HMIS Advisory Committee as vital. Partner Agencies will do their due diligence to collect and verify client information upon client initial program enrollment or as soon as possible. Any information collected by the Partner Agency must be documented into HMIS within 24 hours of entry into a project and complete appropriate discharge within 48 hours of exit from a project.
Data Quality Training Requirements

In order for the HMIS system to be a benefit to clients, a tool for Partner Agencies and a guide for planners, all users must be adequately trained to collect, enter, and extract data. The HMIS Lead will be responsible for developing an annual training schedule. The annual training schedule must include various types and levels of training— for HMIS Agency Administrators, beginning users and advanced users. Trainings can be offered either directly or through HMIS Lead approved, contracted trainers.

End-User Initial Training

All HMIS Users must complete approved training before being given access to HMIS. Users should be trained on: user of HMIS software and the confidentiality/security requirements of the Privacy Notice. As part of the training, each employee and volunteer of your agency who collects, reads, or is otherwise exposed to client information must be given a copy of the full Privacy Notice, be allowed to read it, then must sign the Acknowledgment enclosed in this manual as Appendix C to confirm they have read and understood the policy.

It is encouraged that all HMIS Users also receive agency-specific training in order to fulfill Partner Agency expectations for entering data.

Ongoing Training

In order to remain current on HUD standards and local continuum expectations, all HMIS users are required to complete annual training and training on all HMIS software updates. These ongoing trainings can be in the form of: attendance to User Group meetings, HMIS Lead approved online/in-person trainings, and individualized meeting with HMIS Lead representatives. The HMIS Lead and HMIS Agency Administrators will communicate training opportunities to users.

Annual reviews for data quality, security and privacy standards compliance will be conducted to ensure agencies are meeting requirements. The HMIS Lead will work with HMIS Agency Administrators to schedule annual site-visits to ensure compliance across the Saint Louis County CoC.
You may keep this summary of the policy. A copy of the full privacy notice is available upon request.
Appendix C: Employee Acknowledgment

____________________________________
Agency Name

Employee Acknowledgment of Privacy Notice

I, ____________________________________________________________________________________________, hereby acknowledge that I have received, read and pledge to comply with the Homeless Management Information System Privacy Notice.

____________________________________  ______________________________________
Date  Name
Appendix A: Full Privacy Policy (sample)

Homeless Management Information System
Privacy and Security Notice

A written copy of this policy is available by request.

I. Purpose

This notice describes the privacy policy of Municipal Information Systems, Inc. The policy may be amended at any time. We may use or disclose your information to provide you with services and comply with legal and other obligations. We assume that, by requesting services from our agency, you agree to allow us to collect information and to use or disclose it as described in this notice and as otherwise required by law.

The Homeless Management Information System (HMIS) was developed to meet a data collection requirement made by the United States Congress and the Department of Housing and Urban Development (HUD). Congress passed this requirement in order to get a more accurate count of individuals who are homeless and to identify the need for and use of different services by those individuals and families. We are collecting statistical information on those who use our services and report this information to a central data collection system.

In addition, many agencies in this area use HMIS to keep computerized case records. This information may be provided to other HMIS participating agencies. The information you may agree to allow us to collect and share includes: basic identifying demographic data, such as name, address, phone number and birth date; the nature of your situation and the services and referrals you receive from this agency. This information is known as your Protected Personal Information or PPI.

Generally, all personal information we maintain is covered by this policy. Generally, your personal information will only be used by this agency and other agencies to which you are referred for services.

Information shared with other HMIS agencies helps us to better serve our clients, to coordinate client services, and to better understand the number of individuals who need services from more than one agency. This may help us to meet your needs and the needs of others in our community by allowing us to develop new and more efficient programs. Sharing information can also help us to make referrals more easily and may reduce the amount of paperwork.

Maintaining the privacy and safety of those using our services is very important to us. Information gathered about you is personal and private. We collect information only when appropriate to provide services, manage our organization, or as required by law.
II. Confidentiality Rights

This agency has a confidential policy that has been approved by its Board of Directors. This policy follows all HUD confidentiality regulations that are applicable to this agency, including those covering programs that receive HUD funding for homeless services. Separate rules apply for HIPPA privacy and security regulations regarding medical records.

This agency will use and disclose personal information from HMIS only in the following circumstances:

9) To provide or coordinate services to an individual.
10) For functions related to payment or reimbursement for services.
11) To carry out administrative functions including, but not limited to legal, audit, personnel, planning, oversight or management functions.
12) Databases used for research, where all identifying information has been removed.
13) Contractual research where privacy conditions are met.
14) Where a disclosure is required by law and disclosure complies with and is limited to the requirements of the law. Instances where this might occur are during a medical emergency, to report a crime against staff of the agency or a crime on agency premises, or to avert a serious threat to health or safety, including a person's attempt to harm himself or herself.
15) To comply with government reporting obligations.
16) In connection with a court order, warrant, subpoena or other court proceeding requiring disclosure.

III. Client rights:

Any client receiving services from your agency has the following rights:

7) **Access to his/her record.** A client has the right to review his or her record in the HMIS. He or she may request review of the record within five working days.

8) **Correction of an HMIS record.** A client has the right to request that his or her HMIS record is correct so that information is accurate. This ensures fairness in its use.

9) **Refusal.** Your agency's ability to assist a client depends on the documentation of certain personal identifying information. You may decline to provide services to a client who refuses to provide this data.

10) **Agency's Right to Refuse Inspection of an Individual Record.** You may deny a client the right to inspect or copy his or her personal information for the following reasons:

b. information is compiled in reasonable anticipation of litigation or comparable proceedings;
c. Information about another individual other than the agency staff would be disclosed;

d. Information was obtained under a promise of confidentiality other than a promise from this provider and disclosure would reveal the source of the information; or

e. Information reasonably likely to endanger the life or physical safety of any individual if disclosed.

11) **Harassment.** The agency reserves the right to reject repeated or harassing requests for access or correction. However, if the agency denies your request for access or correction, you will be provided written documentation regarding your request and the reason for denial. A copy of that documentation will also be included in your client record.

12) **Grievance.** You have the right to be heard if you feel that your confidentiality rights have been violated, if you have been denied access to your personal records, or if you have been put at personal risk, or harmed. Our agency has established a formal grievance process for you to use in such a circumstance. To file a complaint or grievance you should contact our Chief Privacy Officer.

IV. **HOW YOUR INFORMATION WILL BE KEPT SECURE:**

Protecting the safety and privacy of individuals receiving services and the confidentiality of their records is of paramount importance to us. Through training, policies, procedures and software, we have taken the following steps to make sure your information is kept safe and secure:

1) The computer program we use has the highest degree of security protection available.

2) Only trained and authorized individuals will enter or view your personal information.

3) Your name and other identifying information will not be contained in HMIS reports that are issued to local, state or national agencies.

4) Employees receive training in privacy protection and agree to follow strict confidentiality standards before using the system.

5) The server/database/software only allows individuals access to the information. Only those who should see certain information will be allowed to see that information.

6) The server/database will communicate using 128-bit encryption—an Internet technology intended to keep information private while it is transported back and forth across the Internet. Furthermore, identifying data stored on the server is also encrypted or coded so that it cannot be recognized.

7) The server/database exists behind a firewall, which is a program designed to keep hackers and viruses away from the server.
8) The main database will be kept physically secure, meaning only authorized personnel will have access to the server/database.
9) System Administrators employed by the HMIS and the agency support the operation of the database. Administration of the database is governed by agreements that limit the use of personal information to providing administrative support and generating reports using aggregated information. These agreements further inscribe the confidentiality of your personal information.

V. BENEFITS OF HMIS AND AGENCY INFORMATION SHARING:

Information you provide us can play an important role in our ability and the ability of other agencies to continue to provide the services that you and others in the community are requesting.

Allowing us to share your name results in a more accurate count of individuals and the services they use. Obtaining an accurate count is important because it can help us and other agencies:

1) Better demonstrate the need for services and the specific types of assistance needed in our area.
2) Obtain more money and other resources to provide services.
3) Plan and deliver quality services to you and your family.
4) Assist the agency to improve its work with families and individuals who are homeless.
5) Keep required statistics for state and federal funders, such as HUD.

VI. COMPLIANCE WITH OTHER LAWS

This agency complies with all other federal, state and local laws regarding privacy rights. Consult with an attorney if you have questions regarding these rights.

VII. PRIVACY NOTICE AMENDMENTS:

The policies covered under this Privacy Notice may be amended over time and those amendments may affect information obtained by the agency before the date of the change. All amendments to the Privacy Notice must be consistent with the requirements of the Federal Standards that protect the privacy of consumers and guide HMIS implementation and operation.

Appendix D: Sign for Intake Desks
Notice to Public

We collect personal information directly from you for reasons that are discussed in our privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate. You may request a copy of our full Privacy Notice.
Option 2

We collect personal information from you to:

1) Better understand your needs
2) Improve our services
3) Comply with federal, state & local laws
4) Provide reports for our funders

We only ask for information we truly need - nothing more.

Want more details?  Ask to see our Privacy Statement.
The PHA currently has no Preference for Homeless Individuals/Families.
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Section I - Introduction

The Housing Choice Voucher Program (Section 8) helps eligible households afford decent, safe and sanitary housing by paying a portion of their rent each month. At the time of this writing, the Authority is assisting approximately 6,000 families in this manner, scattered throughout 95 municipalities and 60 ZIP code areas. Approximately 3,000 landlords participate in the program and over 5,100 households are on a list awaiting future assistance.

Managing the Housing Choice Voucher Program is a large, complex undertaking. The scope, policies and procedures of this program may change at any time without prior - or contemporaneous - publication in this or any other document.

This Administrative Plan is intended to provide general information concerning the scope, policies and procedures of the Authority's Housing Choice Voucher Program. It is a general overview and is not intended to be a compilation of all material facts concerning the program.

While every attempt has been made to be accurate, no warranty of accuracy is made. Any errors that are found will be corrected in future editions.
Section II - Brief Description of the Housing Choice Voucher Program

Rental assistance programs were created by the 8th section of Title II of the 1937 Housing Act, as amended. Private owners contract with the Authority to rent to lower-income households. The Authority pays owners the difference between the rent residents pay (approximately 30% of their adjusted gross income) and the market rent of the units. Usually no significant rehabilitation is required. The assistance is normally vested in the resident, not the unit. If the resident wants to move at the expiration of a lease and has satisfied all obligations under the program, the assistance follows the resident to a new unit. Rents must be approved by the Authority.

Owner Recruitment and Retention:

Recruitment

HASLC is responsible for ensuring that very low income families have access to all types and ranges of affordable housing in our jurisdiction, particularly housing outside areas of poverty or minority concentration. A critical element in fulfilling this responsibility is for HASLC to ensure that a sufficient number of owners, representing all types and ranges of affordable housing in our jurisdiction, are willing to participate in the HCV program.

HASLC will conduct owner outreach to ensure that owners are familiar with the program and its advantages. HASLC will actively recruit property owners with property outside areas of poverty and minority concentration. These outreach strategies will include:

- Holding owner recruitment/informational meetings once a month
- Participating in community based organizations comprised of private property and apartment owners and managers
- Developing working relationships with owners and real estate brokers associations

Retention

In addition to recruiting owners to participate in the HCV program, HASLC must also provide the kind of customer service that will encourage participating owners to remain active in the program.

All HASLC activities that may affect an owner’s ability to lease a unit will be processed as rapidly as possible, in order to minimize vacancy losses for owners.

HASLC will provide owners with a brochure that explains the program, including HUD and HASLC policies and help new owners succeed through activities such as:

- Providing the owner with a designated HASLC contact person
- Coordinating inspection and leasing activities between HASLC, the owner and the family
- Initiating telephone contact with the owner to explain the inspection process,
- Providing written information about how the program operates, including answers to frequently asked questions
- Additional services may be undertaken on an as-needed basis, and as resources permit
Section III - Waiting List

1. Random Selection (Lottery) Waiting List

A. Opening and closing of the waiting list

The waiting list will be reviewed regularly (normally every six months) and compared to the anticipated need for households in the next six-month period. The Authority may - within its sole discretion - open or close the waiting list.

B. Registrations

A prospect must be a family and must be income-eligible. HUD’s definition of family includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity or marital status: A family may be a single person or a group of people. For purposes of this section a single, pregnant female is considered a family, not a single person. A multi-person family may, or may not, include children. A child who is temporarily (6 months or less) away from the home because of placement in foster care is considered a family member. A family may consist of one or more elderly or disabled persons living with one or more live-in aides.

Gender identity means actual or perceived gender characteristics. Sexual orientation means homosexuality, heterosexuality, or bisexuality.

No person who claims to be the head of a household may register unless he or she has attained 18 years of age or unless otherwise required by law. The Authority will, in its sole discretion, determine if a group of persons is a family.

As a cost saving measure that will also offer efficiency to HASLC clients and employees, we are transitioning to an online application process with the next opening of our Section 8 waiting list.

C. Random selection process

To allocate scarce resources and to give every prospect an equal opportunity to be selected without an unduly long wait, the Authority employs a waiting list lottery system.

Registrations are entered into a Pre-Random Selection pool. After all prospects for a given application period have been entered, the pool is closed. Staff then indicates the number of prospects to be selected and the computer randomly selects that number from the pool. All prospects receive notification informing them whether they have been selected or not. Selected prospects are called in the order they were randomly selected.

D. Maintenance/updating of waiting list

1. A prospect may update the preliminary registration by completing our Preliminary Registration Information Update form available online.

2. A prospect may also change their address by mailing a letter stating their new address, their old address, and their social security number.

3. Note that even if a prospect on the waiting list becomes a participant in another Authority housing program, it is the prospect’s - not the Authority’s - responsibility to change their address on the waiting list by using a Preliminary Registration Information Update form or by sending in a letter.
4. The Authority will remove a prospect’s name from the waiting list when:

   a. The prospect requests in writing that their name be removed,

   b. The prospect does not meet eligibility selection criteria,

   c. The prospect fails to respond in a reasonable time, generally 60 days, or, if applicable, a specified time to a written request for information or written request to declare their continued interest in the program, or

   d. A written request for information or written request to declare a prospect’s continued interest in the program cannot be delivered by the U.S. Postal Service to the prospect at the prospect’s last known address on file at the Authority.

   e. The HASLC must deny the eligibility of a prospect if he/she does not disclose a SSN and/or provide documentation of such SSN, except for individuals who do not contend eligible immigration status, and for individuals age 62 or older as of January 21, 2010, whose initial determination of eligibility was begun before January 31, 2010. However, if the applicant is otherwise eligible to participate in the program, the applicant may maintain his/her place on the waiting list pending disclosure within 30 days.

2. Preference Waiting List

   a. Approved referrals from any homeless programs with which the Housing Authority has a cooperation agreement to the extent that the number of such referrals does not exceed the number of specially earmarked vouchers or units designated for such referrals;

   b. Approved referrals of displaced households from a designated public improvement, development or redevelopment program.

   c. Approved referrals of households experiencing extreme hardship due to a sudden loss of shelter – no alternatives with and/or resources for shelter – because of fire, flood, government condemnation or other good cause, but only when the principle reason for the loss of shelter was not caused by a household member, and not to exceed five such households a month;

   d. Approved referrals from a designated witness protection program;

   e. Approved referrals of households in danger of losing their housing assistance from Missouri state sponsored rental assistance programs, not to exceed 200 vouchers total; and

   f. Approved referrals from any transitional housing programs with which the Housing Authority has a cooperation agreement, not to exceed 10 Vouchers issued per calendar year. (Note: The St. Louis County Department of Human Services or its designee must certify that each referred household has met all the requirements of – and has successfully completed – the transitional housing program before making a referral to the Housing Authority for final approval.)

   g. Section 8 Voucher allocations which target special populations - such as families displaced by the Authority or families living in project-based Section 8 units at the end of a contract - will be made available to the targeted populations without regard to normal waiting list policies and procedures.

   h. Approved referrals from Division of Family Services for the Family Unification Program, not to exceed 200 vouchers. FUP is a program under which vouchers are provided to families for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child or
children, in out-of-home care; or the delay in the discharge of the child, or children, to the family from out-of-home care. There is no statutory limitation on the time a family may receive housing assistance under the program.

i. Approved referrals from The Veteran’s Administrations for the VA Supported Housing Program (VASH) not to exceed the allocations granted, currently 60. VASH is a program under which vouchers are provided to homeless veterans with case management and clinical services provided by the VA through its community medical centers.

3. Moderate Rehabilitation (Mod Rehab) Waiting List

The moderate rehabilitation program provides project-based rental assistance for low income families. The program was designed in 1978 to upgrade rental units with deficiencies requiring a moderate level of upgrading. The program was repealed in 1991 and no new projects are authorized for development. Assistance is limited to properties previously rehabilitated pursuant to a housing assistance payment (HAP) contract between an owner and the Authority.

Eligible families are placed on HASLC’s Mod Rehab Waiting List as they are referred by the Mod Rehab owner. Owners select families for occupancy of a particular unit after screening each family. When the family has leased-up, they pay 30% of their adjusted income towards the rent.

4. Family Self Sufficiency (FSS) Waiting List

Family self-sufficiency (FSS) is a HUD program that encourages communities to develop local strategies to help voucher families obtain employment that will lead to economic independence and self-sufficiency. HASLC’s work with welfare agencies, schools, businesses, and other local partners to develop a comprehensive program that gives participating FSS family members the skills and experience to enable them to obtain employment that pays a living wage.

Families that are selected to receive a voucher or who currently receive assistance through the housing choice voucher program are eligible for participation in the FSS program.

When the Family Self Sufficiency waiting list is open, prospects as well as participants complete a form to indicate whether or not they are interested in the Family Self-Sufficiency Program. The forms are signed and dated by the prospect or participant and if interested, a copy is given to the Section 8 Supervisor responsible for the FSS waiting list who adds those interested to the waiting list in date order. As slots open up, people are called from the waiting list.
Section IV - Determination of Eligibility and Selection of Households

A. Calling households from the Random Selection Waiting List

To achieve optimal use of the HCV funds while stabilizing the program, the Housing Authority uses a HUD spreadsheet titled “HCV Leasing and Spending Projection”. HASLC will determine whether there is adequate funding to issue vouchers, approve moves to higher cost units and areas, and continue subsidizing all current participants by comparing HASLC’s annual budget authority to the annual total HAP needs on a monthly basis. The total HAP needs for the calendar year will be projected by establishing the actual HAP costs year to date. To that figure, HASLC will add anticipated HAP expenditures for the remainder of the calendar year. Projected HAP expenditures will be calculated by multiplying the projected number of units leased per remaining months by the most current month’s average HAP. The projected number of units leased per month will take into account the average monthly turnover of participant families. If the total annual HAP needs equal or exceed the annual budget authority, or if HASLC cannot support the cost of the proposed subsidy commitment (voucher issuance or move) based on the funding analysis, HASLC will be considered to have insufficient funding.

Pre-Random Selection registrations are accepted online only, when the waiting list is open.

B. Special selection of registrants

1. Operation Bootstrap no longer exists as a separate program. It has been incorporated into the Family Self Sufficiency program.

2. Family Self Sufficiency program prospects are selected from those who express an interest at initial certification, recertification or from those who have previously expressed an interest in writing. If interested households exceed available allocations, prospects are placed on a FSS waiting list in the date order in which they expressed an interest. After an initial interview, prospects will be asked to confirm their interest in participating and willingness to abide by program rules or relinquish their place on the FSS waiting list.

3. If the Authority receives additional Vouchers for a homeless program, it will attempt to integrate them with its current program for homeless households and use the same prospect selection criteria.

4. Targeted Vouchers
   a. With the approval of HUD and the need demonstrated to the Housing Authority, the Housing Authority can choose to make Vouchers available to eligible residents in the Section 8 New Construction or Substantial Rehabilitation properties whose owners choose not to renew their term of assistance.
   b. If the Housing Authority receives HUD approval to dispose of Authority-owned assisted units, the Housing Authority can choose to make Vouchers available to those eligible residents who qualify for continued assistance.

C. Interviews

1. The Authority will brief all eligible families regarding:
   a. the portability of Vouchers,
   b. the determination of the Housing Assistance Payment,
   c. the incentive for selecting a unit renting for less than the payment standards,
   d. the minimum rent the family must pay,
   e. all applicable Fair Housing and Equal Opportunity laws,
   f. Housing Quality Standards (HQS),
   g. resident responsibilities under the program, and
   h. the Family Self Sufficiency program.
2. Distributed and retained material. A Voucher will be issued after a family has completed an approved application, has been determined to be eligible and has been selected for participation. Also, at this time, the family shall be given a Voucher’s Holder's packet.

Materials distributed to eligible families may include:
- Briefing Document #BD102
- Briefing Document #BD202
- Briefing Document #BD302
- You Have a Right to Live where You Want To Live
- Website for HCV listings at www.socialserve.com
- Section 8 Existing Housing Allowances for Resident-Furnished Utilities and Other Services
- Dwelling Unit Inspection Report
- Landlord- Law
- Things You Should Know
- portability information, You Can Take It With You and portability contacts for Missouri and Illinois
- resident information sheet including resident responsibilities, fraud, restriction on renting from relatives, maximum initial rent burden (40% rule)
- reasons the Authority may deny or terminate assistance
- policies and procedures concerning informal hearings
- a brochure on lead-paint poisoning
- general information/helpful numbers
- voucher, including term of voucher
- explanation of voucher extension policy
- sample resident authorization to occupy new unit (pink slip)
- brochure on housing discrimination
- map showing school districts in Missouri

Materials retained from eligible families may include:
- all income verification
- Voucher’s Holder's Statement (request for copy of tax return)
- Disclosure Statement and Notification Concerning Lead Poisoning
- Authorization for Release of Information
- Employment/Banking Verification
- Verification of Social Security Numbers
- Personal Declaration form.
- Citizenship Declaration on all family members
- Criminal Disclosure statement
- Verification of Income form
- Summary of Rental Assistance Briefing
- Notice to Clients concerning Violence Against Women Act (VAWA)
- HASLC’s policies for issuing utility checks
- Client’s request for HASLC’s help to negotiate rent
- HASLC’s authorization to discuss personal information with persons other than client
- HUD 52675 “Debts owed to Public Housing Agencies and Terminations” (signed by adults)
- Language Preference Selection Form

D. Verification of income and other information; determination of gross family contribution

All information relative to gross family income and assets will be verified and all verified findings will be documented and recorded. To the extent feasible, staff will use Enterprise Income Verification (EIV)
methods to verify client income. Additional verification methods – including those listed below – may also continue to be used. Staff will investigate and resolve substantial differences between EIV income and income reported through other methods. Resolution may include using a repayment agreement and/or termination of assistance.

   Employment – Client will bring in letter from employer on original letterhead with an original signature on the letter. Client will also bring in three consecutive check stubs. Staff will call personnel office and verify wages and check stubs. If check stub amounts match EIV information, employment letter is not required. If employer will not verify information, staff will determine if employer is on fax-back list and fax the income verification form. (The Work Number or InVerify) Staff will initial and date all income verification and indicate to whom they spoke and the date of the conversation. Income tax returns will also be requested from all clients.

   Self Employment – Staff will request tax returns, receipts and other pertinent records from client.

   TANF – An original letter from DFS will be requested from the client. Staff will also call the toll-free number to verify information and document the call with name, amount, date and signature.

   Initial Social Security letter – Staff will request an original letter from Social Security. Initially in program, staff will use the EIV system for verification.

   Bank statements – Bank statements will be requested from the bank if the bank will provide them at no cost. If this is impossible, staff will request 3 recent bank statements from the client;

   Child Support – Staff will obtain the 8-digit case number from the client, child support order or child support print out. Staff will call the toll-free number and document the last three payments to the client and will sign and date all pertinent forms.

   Full-Time Student verification - Caseworkers will verify all full-time student letters using the studentclearinghouse.org website. If letter is fraudulent, termination will follow.

   Zero Income – The Authority will issue a voucher to zero income households. The Head of Household and other zero income adult members must, in a manner required by the Authority, recertify at least quarterly, regarding their means of basic subsistence such as food, utilities, transportation, etc. The family may be required to provide documentation to prove that income such as unemployment benefits, TANF, SSI, etc., are not being received. A family may be removed from the program if the Authority reasonably concludes that they have unreported income. The Authority may request a credit report on adult members of the family.

Annual income is the gross amount of income anticipated to be received by the household during the twelve months after certification or recertification. Gross income is the amount of income prior to any HUD-allowable expenses or deductions and does not include income which is excluded by HUD. Annual income is used to determine if households are within applicability income limits.

Prospects are required to sign an Authorization for Release of Information initially and at each recertification in addition to other consent forms regarding release of information regarding income, assets and tax returns.

HASLC must deny or terminate assistance if any member of the family fails to sign and submit consent forms for obtaining information in accordance with program regulations.

1) A written application will be signed by the client, or by a responsible member of the client's family if the client is unable to complete and sign the application.

Federal regulations require the disclosure and verification of Social Security numbers on all prospects and residents with the exception of the following:

   a. Individuals who do not contend eligible immigration status.
   b. Individuals age 62 or older as of January 31, 2010, whose initial determination of eligibility was begun before January 31, 2010.
Immigrants must sign a declaration of eligible immigrant’s status and sign a verification consent form. Adult immigrants must certify to their status and provide a “green card” or other acceptable documentation from the Immigration and Naturalization Service. Parents may certify as to the immigration status of their minor children. Citizenship is documented via birth certificates and/or self-declaration, as appropriate.

To verify immigration status, immigrants will be entered into the Department of Homeland Security’s “SAVE” system; Systematic Alien Verification for Entitlements system by the Director of Assisted Housing or a Supervisor of Assisted Housing. The file will be documented with the results.

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the student’s eligibility must be examined along with the income eligibility of the student’s parents. In these cases, both the student and the student’s parents must be income eligible for the student to receive HCV assistance. If, however, a student in these circumstances is determined independent from his/her parents in accordance with PHA policy, the income of the student’s parents will not be considered in determining the student’s eligibility.

HASLC will consider a student “independent” from his or her parents and the parents’ income will not be considered when determining the student’s eligibility if the following four criteria are met:

The individual is of legal contract age under state law.

The individual has established a household separate from his/her parents for at least one year prior to application for occupancy or the individual meets the U.S. Department of Education’s definition of independent student.

To be considered an independent student according to the Department of Education, a student must meet one or more of the following criteria:

- Be at least 24 years old by December 31 of the award year for which aid is sought
- Be an orphan or ward of the court through the age of 18
- Be a veteran of the U.S. Armed Forces
- Have one or more legal dependents other than a spouse (for example, dependent children or an elderly dependent parent)
- Be a graduate or professional student
- Be married

The individual was not claimed as a dependent by his/her parents pursuant to IRS regulations, as demonstrated on the parents’ most recent tax forms.

The individual provides a certification of the amount of financial assistance that will be provided by his/her parents. This certification must be signed by the individual providing the support and must be submitted even if no assistance is being provided.

HASLC must terminate assistance if any family member fails to meet the eligibility requirements concerning certain individuals enrolled at an institution of higher education.

2) All information relative to previous housing, gross family income and assets will be verified. To the extent considered necessary, all verified findings will be documented and recorded in the prospect’s folder. All sensitive information is maintained in file folders in staff offices and/or in file cabinets in reasonable security and is not knowingly misused or improperly disseminated.

3) Verified information will be analyzed and a determination will be made with respect to the following:

a. eligibility of prospect as an eligible type of household,

b. eligibility of prospect with respect to income limits for admission,

c. size of unit required for the family,

d. security deposit and estimated rent,
4) Family Share of Rent – is the family’s contribution toward the gross rent. The family share may be the TTP or a higher amount, depending on the unit the family selects.

Income – includes all monetary amounts which are received on behalf of the family. For purposes of calculating the TTP, HUD regulations define what is to be included and excluded. The Authority includes all income which is not specifically excluded in these regulations.

Annual Income – is the gross amount of income anticipated to be received by the family during the 12 month period after certification or recertification. Gross income is the amount of income prior to any HUD-allowable expenses or deductions, and does not include income which has been excluded by HUD. Annual income is used to determine if prospects are within applicable income limits.

Adjusted Income – is defined as annual income less any HUD allowable expenses and deductions.

Family Rent to Owner – is the portion of the family share of rent that is paid to the owner as rent. If the family is not responsible for paying any utilities under the lease, family rent to owner equals the family’s share. Where families are responsible for directly paying some or all of the utilities, family rent to owner is calculated by subtracting the HAP amount from the rent to the owner. The rent to owner is limited by rent reasonableness. HASLC documents that the rent to the owner is reasonable in comparison to rent for other comparable unassisted units. Another limitation on rent to owner is the maximum rent standard at initial occupancy. At the time a family initially goes on the program in a specific unit – whether it is a new admission or a move to a different unit – the family’s share of rent cannot exceed 40% of the family’s monthly adjusted gross income.

Minimum Rent – is $50.00. Minimum rent refers to the TTP and includes the combined amount a family pays toward rent and/or utilities when it is applied.

The family’s portion of monthly income to be paid for rent and utilities is called the Total Resident Payment or TTP. For each eligible family with a Voucher, this amount will be the greater of 30% of adjusted gross income or $50. The Voucher program allows a family’s TTP to exceed 30%, but it may not be less than $50. The actual percentage will vary with the family’s annual income, number of minors, payment standard, and extent of medical payments, if applicable. The family’s portion of the rent may not exceed 40% of their monthly adjusted gross income at initial lease up.

If a family does not meet the 40% rule, HASLC will not consider non-verifiable income unless it was previously presented and accepted. HASLC will accept new verifiable income such as employment, unemployment, etc.

Imputed welfare income is potential annual income that is not actually received by a household as a result of an official welfare benefit reduction. Imputed welfare income is included in a family’s annual income for purposes of rent calculation for the duration of the welfare benefit reduction.

Adjusted income is the income upon which rent calculations are based – annual income less appropriate deductions and exemptions. Deductions may include child care expense, medical expense, disability expense, dependent allowance and an elderly/disabled allowance. All income not specifically excluded by law or regulation is used in rent calculation.
5) All other necessary verifications and determinations will be obtained including evidence of citizenship or immigration status, as required. Note that if a household has verifiable childcare expenses - such as canceled checks or money order receipts - the Authority will use the actual expense as an allowance if it is necessary to enable a family member to:

a. be gainfully employed – deduction may not exceed amount of employment income,

b. actively seek work and provide documented proof of such,

c. further education – academic or vocational and provide documented proof of such.

Child care expenses must be anticipated and must be for the care of children under the age of 13, including foster children. The expense must be reasonable, verifiable and not reimbursed by a source outside the family. In cases where the child care submitted is unreasonable or questionable, i.e. exceeds the employment income or cannot be verified, HASLC will use the current Division of Family Services Child Care Family Eligibility Income Guidelines.

Medical Expenses will be anticipated for the following twelve month period based upon the past twelve months experience for eligible families, unless they can provide clear documentation of an expense the family will have during the next twelve months that is of a different type than previously experienced. If such an anticipated expense was included in the last recertification, it will not again be used in a subsequent recertification.

Non-prescription medicines must be doctor-recommended in order to be considered a medical expense and will be counted toward medical expenses for families who qualify if the family furnished legible receipts.

6) Earned Income Disallowance is the earned income of a Previously Employed Person or Qualified Family used for admissions purposes, but not for rent calculation purposes. HASLC works closely with the welfare office concerning the verification of welfare benefits.

Previously employed person. Someone with disabilities who has earned – in the 12 months prior to employment – not more than would be received for 10 hours of work per week for 50 weeks at the established minimum wage.

Qualified family. A resident household whose annual income increases due to one of the following reasons:

- employment of a family member who is a person with disabilities and was previously unemployed for one or more years prior to employment
- increased earnings by a family member who is a person with disabilities during participation in any economic self-sufficiency or other job training program
- new employment or increased earnings of a family member who is a person with disabilities during or within 6 months after receiving assistance, benefits or service under any state program for temporary assistance (TANF, Welfare to Work, etc.).

7) HASLC promotes safe assisted and public housing. In furtherance of this end, HASLC will use reasonable efforts to prevent those with an unacceptable criminal history or substance abuse problem or history from being issued a Voucher or being admitted to Public Housing.

When prospects are called in from the waiting list, all adult family members (17 or more years old) must sign a release form so that the Authority can check their criminal records. If a live-in aide is approved by HASLC, he/she must also sign a release form so the Authority may check their criminal history.

If the records indicate there are one or more outstanding warrants, the Authority provides 30 days for the client to clear those warrants. If the client clears all warrants within 30 days and so informs the Authority, HASLC will then check their criminal records and make a determination of acceptability. If the client does not clear all outstanding warrants or does not so inform the Authority, the client’s name will be removed from the waiting list and be given 10 days to request a hearing.
If the client has no criminal history, or has an acceptable history, HASLC will continue further processing for admission.

If there is an unacceptable history, the Authority will give the client a letter indicating the possible denial, enclosing a copy of the criminal record (if any) on which the denial was based. The letter will provide 10 days in which to request a hearing.

The Authority will deny participation for the following reasons:

(1) Any household member is subject to a lifetime registration requirement under a state sex offender registration program. To fulfill the obligation to perform criminal background checks during the application process to determine if any member of an prospect household is subject to a lifetime registration requirement under any state sex offender registration program, HASLC has access to a national database covering sex offender registries in all states.

(2) Any household member has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.

The Authority may – in its sole discretion – deny participation for any of the following reasons:

(1) Any household member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.

(2) Any household member has been evicted from federally assisted housing in the last 3 years for drug-related criminal activity. However, the Authority may admit the household if – in its sole discretion – the Authority determines that the evicted household member has successfully completed a supervised drug rehabilitation program approved by the Authority, or that the circumstances leading to eviction no longer exist (i.e., the criminal household member has died or is imprisoned).

(3) The Authority has reasonable cause to believe that any household member’s illegal drug use may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

(4) The Authority has reasonable cause to believe that any household member’s alcohol abuse or pattern of alcohol abuse may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

(5) Any household member is currently engaged in – or has engaged in within 5 years of the admission decision – drug-related criminal activity. Among other things, any violation of the Missouri Controlled Substance Law will generally be presumed to bar participation in the Authority’s programs.

(6) Any household member is currently engaged in – or has engaged in within 10 years of the admission decision – violent criminal activity. Assault, rape, robbery, arson, murder, and crimes closely related to these five are generally presumed to bar participation in the Authority’s programs. Other criminal acts may also bar participation in the Authority’s programs if – in the sole discretion of the Authority – serious bodily harm was inflicted by or threatened by a family member.

(7) Any household member is currently engaged in – or has engaged in within 10 years of the admission decision – other criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity.
(8) Any household member is currently engaged in – or has engaged in within 10 years of the admission decision – other criminal activity that may threaten the health or safety of the owner, property management staff, or persons performing a contract administration function or responsibility on behalf of the Authority, including an Authority employee, contractor, subcontractor or agent.

(9) Any household member has failed to adhere to court and probation/parole mandated conditions for any action related to any prohibited activity.

In determining whether to deny or terminate assistance because of action or failure to act by members of the family:

(a) The Authority may consider all relevant circumstances, such as the seriousness of the case, the extent of participation or culpability of individual family members, mitigating circumstances related to the disability of a family member, and the effects of denial or termination of assistance on other family members who were not involved in the action or failure.

(b) The Authority may impose, as a condition of continued assistance for other family members, a requirement that any family members who participated in or were culpable for the action or failure will not reside in the unit. The Authority may permit innocent members of a participant family to continue receiving assistance. As a condition of continued assistance, the head of household must certify with a notarized “Affidavit of Residency” that the culpable family member has vacated the unit and will not be permitted to visit or to stay as a guest in the assisted unit. The head of household must provide two documents from the document list, showing that the family member is no longer a resident at the subsidized unit. If the tenant is a county resident, the occupancy permit for the subsidized unit must be updated to remove the member losing assistance. The revised occupancy permit must be submitted to the Housing Authority timely and will be used as one of the two documents required. The family must present evidence of the former family member’s current address upon PHA request.

(c) In determining whether to deny admission or terminate assistance for illegal use of drugs or alcohol abuse by a household member who is no longer engaged in such behavior, the Authority may consider whether such household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program, or has otherwise been rehabilitated successfully. For this purpose, the Authority may require the prospect or resident to submit evidence of the household member’s current participation in, or successful completion of, a supervised drug or alcohol rehabilitation program or evidence of otherwise having been rehabilitated successfully.

E. Determination of appropriate unit size

The Housing Authority will determine the composition of an assisted family and who can live in an assisted unit, initially and throughout a family’s participation. Except for birth, adoption or court-awarded custody, an assisted family must get Authority approval to add a new member. Additions to family or household composition may also occur with custodial care of a child through the Division of Family Services, foster children or foster adults; however, HASLC will not approve the addition of a foster child or foster adult if it will cause a violation of HQS space standards. The establishment of life partner relationships or requirements to care for elderly or disabled, immediate family members will also be considered. A family must immediately notify the Authority of any change in family size.

If the Head of Household dies, any remaining adult family member who may legally sign a lease with the current landlord, may continue to receive the Section 8 assistance as a remaining member, if the landlord is agreeable.

If the only remaining member(s) is a minor, The Housing Choice Voucher may be transferred to a caretaker if custody or legal guardianship has been awarded to a caretaker. HASLC has the right to reject a particular
individual as a caretaker based on criminal acts and drug related criminal activity as well as owing rent to
any PHA.

If a family breaks apart, the Authority will determine which - if any - remaining portion of the family
retains the Voucher. The interests of minor children, and ill, elderly or disabled family members will be
considered in making this determination. In documented cases of actual or threatened physical violence
against family members by a spouse or other member of the household, the family member who was
threatened or abused shall retain the rental assistance even if he or she has left the subsidized unit.

Resident is defined as the person or persons (other than a live-in aide) who executes the lease as lessee of a
dwelling unit. A resident must have legal capacity to enter into a lease under state and local law.

Unit size will be determined by the bedroom occupancy standards as follows. To make economic use of
limited resources, a household will be allowed the smallest number of bedrooms consistent with decent,
safe and sanitary housing, and consistent with local housing codes. The number of bedrooms allowed will
not require more than two persons to occupy the same bedroom and will not require persons of the opposite
sex to share a bedroom except for husband and wife or if at least one of the two occupants is a child under 5
years old.

1) A single parent and a child of either sex under the age of 5 years will be issued a one-bedroom
Voucher.

2) A household with 2 children of opposite sex, both under 5 years of age, will be issued a two
bedroom Voucher.

3) A household with two children of the same sex, regardless of age, will be issued a two bedroom
Voucher.

4) The Authority will issue a two bedroom Voucher to an elderly couple or elderly/disabled person
only under the following conditions:
   a) one household member must have proof of needed hospital equipment such as oxygen
   or other medical hook-up equipment, and
   b) verification of said medical equipment will need signed confirmation from the
      physician on a form furnished by the Authority.

5) The Authority will certify the household for a bedroom for a live-in attendant only if the acting
physician verifies, on the Authority's form, that the attendant is needed in order for an elderly, near-elderly
or disabled resident to be able to function on a day-to-day basis to sustain life. Only one live-in attendant
will be allowed per household. A family’s request for an additional bedroom must be in writing and must
clearly explain why the additional bedroom is necessary. The Authority may require an update of the
medical documentation, at any time, on HASLC forms, verifying the need or justification for an extra
bedroom. A State of Missouri licensed professional must provide certification of the need for an extra
bedroom or live-in aide. HASLC has the right to reject a particular individual as a live-in aide based on
criminal acts and drug-related activity as well as owing rent to any PHA.

Relatives are not automatically excluded as eligible live-in aides, however, a pre-existing household
member does not qualify as a live-in aide. When a household requests to add a relative as a live-in-aid, the
household must certify that:
   a) The live-in-aide is qualified to provide the needed care
   b) The live-in-aide was not part of the household prior to receiving program assistance
   c) There is no other reason for the aide to reside in the unit (i.e. the individual can demonstrate
      they have a previous residence they left in good standing)
   d) The live-in-aide has no other obligations (school, employment) that would take them from the
      home and hinder the care needed for the disabled participant
   e) The aide and the participant will maintain separate finances
f) The owner of the unit has approved the live-in-aide.
g) A live-in-aide will be approved for an additional 1 bedroom only. Live-in-aides requiring more than one additional bedroom will not be considered.
h) Occasional, intermittent, multiple or rotating care givers do not meet the definition of a live-in aide since 24 CFR Section 982.402(7) implies that live-in-aides must reside with a family permanently for the family unit size to be adjusted in accordance with the subsidy standards established by HASLC. Therefore, regardless of whether these caregivers spend the night, an additional bedroom will not be approved.

6) The Authority, in its sole discretion, may allow a bedroom and a deduction for a full time college student attending school within 250 miles of the assisted household's dwelling unit.

7) If a household does not have at least 51% custody of a child, the Authority, in its sole discretion, will generally not allow a bedroom and a deduction.

8) A child who is temporarily (6 months or less) away from home because of placement in foster care is considered a member of the family.

F. Vouchers will be issued upon availability. Over-issuing is within the sole discretion of the Authority.

G. Time limit for Vouchers

1. New Vouchers are generally issued for a 60- to 120-day period, based on anticipated program and market conditions. Recertifications are generally issued for a 60-day period. The family must submit required lease papers within the issuance period.

2. Extensions for the applicable voucher time periods are generally not granted and are at the discretion of the HA. Under no circumstances will the initial term plus any discretionary extension exceed 120 calendar days from the date of issuance. The decision to grant an extension for good cause may be premised on the following verified, exceptional circumstances:

a) The family or individual was not able to actively search for housing due to extenuating circumstances beyond the control of the voucher holder that must be verified, (i.e. disaster or death in the family requiring travel out of state);

b) A voucher holder suffered from severe medical difficulties, an unexpected illness or hospitalization (i.e. rehabilitation program) that must be verified, during the initial 120 day search period. Under these circumstances, the HA will extend the search period for 60 days or if such time was more than 60 days, for as many days as an applicant was hospitalized, in a rehabilitation center, or incapacitated due to illness, not to exceed 120 days;

c) An individual or member of the household requires a reasonable accommodation for a disability. The HA will extend such voucher term as is reasonably necessary so that the program may be accessible to a family member or individual who is a person with a disability;

d) A household is qualified as a “hard to house” family due to size and/or the need to accommodate for an individual or family member’s disability;

e) Accommodation to a family who is porting out, if the receiving PHA is requesting additional time to brief the family.

3. To obtain an extension, the family must make a request in writing prior to the expiration date. A statement of the efforts the family has made to find a unit must accompany the request. If a voucher is due to expire, the voucher holder may request an extension of the voucher. In order for a request for an extension to be considered by the HA, the following conditions must be met:
a) The request for an extension must be in writing.
b) The request must be made prior to the expiration of the voucher.
c) An extension is necessary as a reasonable accommodation for a person with disabilities.
d) An extension is necessary due to reasons beyond the family’s control such as serious illness or death in the family, other family emergency, family size or other special requirements making finding a unit difficult.
e) The presence of these circumstances does not guarantee that an extension will be granted.

HASLC will decide whether to approve or deny an extension request within 10 business days of the date the request is received, and will provide the family written notification of its decision.
Section V - Initial Lease Up

A. When the family finds a suitable unit, it must submit to the Housing Authority:
   - 3 completed Tenancy Addenda,
   - 3 Lead disclosures signed by both the participant and the landlord,
   - 3 Leases, and
   - 3 Request for Tenancy Approval forms (or equivalent) showing responsibility for utilities and appliances.
   - 3 signed Authorization to Change Lease forms
   - 3 signed Relative Rule notices
   - 1 Landlord W-9 form, completed

In case of any conflict between the provisions of the lease and the Tenancy Addendum, the provisions of the Addendum shall prevail.

The family must submit these documents during the unexpired term of the Voucher. Documents for multiple units may be submitted serially, but only documents related to a single unit may be submitted and processed at one time. If a unit fails to pass inspection or if the owner and the Authority cannot agree on rent, documents for another unit may be submitted and processed.

B. The Housing Authority may review the submitted papers for any inconsistencies or omissions. If the leases are approved, an initial inspection will be scheduled for unit and rent approval.

C. At the time of the initial execution of the lease the owner may collect a security deposit that is reasonable, does not exceed what is charged unassisted residents, and does not exceed the maximum amount allowable under state or local law. Owners have no claim on the Authority for damages or any other amount a resident owes under the lease.

D. Steps for approval of assisted occupancy

1. When a unit passes HQS and a rent is established, the caseworker will then put the unit on the program and submit the papers to the Accounting Department for a HAP.

Housing Quality Standards (HQS): To protect the health, welfare and safety of the clients in our Section 8 program, we will enforce HUD’s Housing Quality Standards. The HQS are a guide of acceptable conditions within a dwelling unit. A unit must pass HQS before a tenant is approved to move into the unit.

2. When the caseworker puts the unit on the program, she/he will put a hold on the check until the contract is signed by the owner and the Housing Authority.

3. Rent Reasonableness Methodology – Rental information is continuously gathered for unassisted market units throughout St. Louis City and County. The information is gathered from a variety of sources such as newspaper and magazine ads, various websites, field surveys and telephone inquiries. Location, size, unit type, age, quality, utilities, amenities, facilities and housing and maintenance services are considered.

   Staff enters this information into our rental data base and maintains the data for each zip code/census tract. Each zip code/census tract has rental data which is subdivided into age, amenities and facilities, location, maintenance, quality, size, unit type and utilities provided. Using a point system the subject property and three unassisted market units are compared to determine rent reasonableness.

   The Housing Evaluator completes a unit comparison to certify that the approved rent is reasonable and not in excess of rents currently being charged by owners of comparable unassisted units. The Rent Comparison (RC) score will become part of the unit’s permanent record.
This process is completed for each unit coming into the program, as well as any unit already on the program that has in increase or decrease in the rent for the next term.

The Housing Evaluator certifies in writing that an approved rent is reasonable and not in excess of rents currently being charged by an owner for comparable unassisted units. The Summary and Certification form is kept as part of the unit’s permanent record.

E. Portability of Vouchers

To avoid the administrative complexities of a resident using a Voucher issued in one area and used in another, the Housing Authority will attempt to negotiate with the other authority be it the issuing, or the receiving, authority.

1. If we are the receiving authority and have allocations available, we may offer a St. Louis County Voucher to the resident. Residents porting into St. Louis County and leasing up for the first time must meet HASLC income guidelines to be eligible.

2. If we are the issuing authority, we will encourage the receiving authority to offer one of their Vouchers to the resident. If the receiving authority refuses, they will administer the Voucher and bill us.

3. The Authority will consider Family Self Sufficiency Vouchers to be portable either into or out of the combined geographic area of St. Louis City and County, providing the participant can complete goals in the new location and any escrow is transferred to the receiving agency.

F. Additional Family Self Sufficiency Requirements

Households who choose FSS Vouchers will be required to agree to an Individual Training and Service Plan and execute a Contract of Participation. Households will be required to receive services directly from the Authority or another agency. If the participant’s goal includes homeownership, they must complete either HASLC’s homeownership counseling program, or a comparable program approved by HASLC.

G. Utility Allowances

The Authority reviews utility allowances at least annually. A computer spreadsheet is used to make mathematical calculations and produce Utility Allowance Schedules.

Allowances are based on standard usage tables provided by HUD, consumer experience tables provided by utility companies, and utility rate structures. The allowances attempt to approximate a reasonable consumption of utilities by an energy-conservative household of modest circumstances consistent with a safe, sanitary and healthful living environment. Linear regression analysis may be used to smooth out highly volatile utility costs.

Based on the Utility Allowance Schedules, the Authority calculates an actual utility allowance for each Section 8 tenancy. The actual utility allowance is then used in a HUD-prescribed formula to calculate resident rent.

When HUD-required calculations – for new certifications, interim or annual recertifications result in a Utility Allowance credit (also called a utility reimbursement payment) or URP the credit is paid to the resident each month.
Section VI - Resident Responsibilities

A. Continuing responsibilities. Participants in the Housing Choice Voucher Program have the following continuing responsibilities:
   a. timely payment of rent
   b. timely reporting of any change in household income
   c. timely reporting of any change in household size
   d. keeping resident-paid utilities in service
   e. making dwelling unit available for inspection upon reasonable notice
   f. keeping appointments with the Authority
   g. timely response to letters from the Authority
   h. notifying the Authority before vacating the dwelling unit
   i. except as noted in Section VI C, below, using the dwelling unit solely for residence by the family and as the family's principal place of residence, and not assigning the lease or transferring the unit,
   j. not engaging in drug-related criminal activity or violent criminal activity including criminal activity by any family member, and
   k. abiding by any further requirements imposed by the Voucher, law or regulation
   l. sign and submit consent forms for obtaining information in accordance with program regulations.

B. Family Self Sufficiency. Participants in the Family Self Sufficiency program must fulfill the requirements of their Individual Training and Service Plan and Contract of Participation. Moreover, if an FSS household does not pay its share of rent or other amounts due under their lease, or if a household commits fraud in connection with the FSS program, the Authority - in its sole discretion - may terminate any and all assistance, eliminate the household's escrow account, and/or take any other action allowed by law, regulation or policy.

C. Business in unit. Families may engage in legal for-profit activities in their assisted unit. This includes any legal internet businesses. Any use of the unit for business activities by family members must be incidental to the primary use of the unit as a residence, must be in compliance with local law, and must not be prohibited by the lease. The family must timely report the business and income from the business to the Authority. Failure to abide by these provisions may result in the termination of assistance.

D. Absence from unit. The Authority will consider a family to be absent if the head of household (or head and spouse for families with both) is (are) not residing in the unit. Families may be absent from the unit for brief periods, if the family is planning on returning to the unit. In documented cases of hospitalization, drug rehabilitation or nursing home care, the Authority will allow a maximum of 90 consecutive, or substantially consecutive, days before termination. For absence due to imprisonment, a maximum of 30 consecutive, or substantially consecutive, days is allowed. Families whose absence falls outside of these guidelines will be terminated. They may reapply if the waiting list is open.

E. Unauthorized Occupants. If it comes to the attention of the Housing Authority that a participant may have unauthorized persons residing in the subsidized unit, the Housing Authority will begin an investigation. This may include unannounced inspections of the unit, a postal check to see if a specific individual receives mail at the unit, review of the occupancy permit, police reports with self-incriminating statements regarding residency, sex offender registration information, probation and parole records of residency, and review of legal documents such as driver’s license. If the preponderance of evidence shows unauthorized occupant or occupants, the resident will be terminated from the Section 8 program.

F. Crime and Substance Abuse. HASLC will terminate participation of those with unacceptable criminal behavior or a substance abuse problem.

G. Mandatory Prohibition for Lifetime Sex Offenders. HASLC prohibits issuance of a voucher to any family that includes as a member of the household a person subject to any State’s lifetime sex offender registration requirement. Except as otherwise provided in this paragraph, HASLC must terminate assistance
to a household if any member of the household becomes subject to any State’s lifetime sex offender registration requirement. Except as otherwise provided in this paragraph, HASLC must terminate assistance to a household that was admitted to the program after June 25, 2001 that includes a member of the household who: (a) either (1) was at the time of admission, or (2) subsequently became, subject to any State’s lifetime sex offender registration requirement; and (b)(1) was either allowed to become or remain a participant in the program by reason of error or oversight by HASLC, or (2) whose registration requirement status was either uncertain under the law at the time of admission or altered by a subsequent change in the law. Assistance to the household must be terminated unless the family agrees to remove the ineligible member from the household and exclude the member from the home within ten calendar days of a written demand by HASLC for such action. Assistance to the household may still be terminated by HASLC if the family permits the ineligible member to enter the unit once he or she has been removed from the household.

H. The Authority must terminate assistance if any household member has ever been convicted of the manufacture or production of methamphetamine on the premises of federally-assisted housing.

The Authority may terminate participation for any of the following reasons:

1. any illegal use of a drug by a household member;
2. a pattern of illegal use of a drug by a household member that interferes with the health, safety or right to peaceful enjoyment of the premises by other residents;
3. a household member’s drug-related criminal activity; among other things, any violation of the Missouri Controlled Substance Law will generally lead to termination;
4. a household member’s violent criminal activity; assault, rape, robbery, arson, murder, and crimes closely related to these five will generally lead to termination; other criminal acts may also result in termination if – in the sole discretion of the Authority – serious bodily harm was inflicted by or threatened by a family member;
5. a household member’s other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents or persons residing in the immediate vicinity of the premises;
6. a household member’s abuse or pattern of abuse of alcohol that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents;
7. if any member of the household commits fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.
8. if any household member has failed to adhere to court and probation/parole mandated conditions for any action related to any prohibited activity.

The Authority may terminate assistance for criminal activity by a household member if it determines, based on a preponderance of evidence, that the household member has engaged in the activity, regardless of whether the household member has been arrested or convicted for such activity.

The Authority may consider all circumstances relevant to a particular case such as the seriousness of the offending action, the extent of participation by the leaseholder in the offending action, the effects that the eviction would have on family members not involved in the offending activity, and the extent to which the leaseholder has shown personal responsibility and has taken reasonable steps to prevent or mitigate the offending action.

The Authority may require a resident to exclude a household member in order to continue to reside in the assisted unit, if that household member has participated in or is culpable for action or failure to act that warrants termination.

As a condition of continued assistance, the head of household must certify that the culpable family member has vacated the unit and will not be permitted to visit or to stay as a guest in the assisted unit. The family must present evidence of the former family member’s current address upon PHA request. A revised
occupancy permit showing the member removed will also be required for municipalities requiring occupancy permits.

In determining whether to terminate tenancy for illegal drug use or a pattern of illegal drug use by a household member who is no longer engaging in such use, or for abuse or a pattern of abuse of alcohol by a household member who is no longer engaging in such abuse, the Authority may consider whether such household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program, or has otherwise been rehabilitated successfully. The Authority may require the resident to submit evidence of the household member’s current participation in, or successful completion of, a supervised drug or alcohol rehabilitation program or evidence of otherwise having been rehabilitated successfully.

If the Authority proposes to terminate assistance for criminal activity as indicated by a criminal record, it must notify the household of the proposed action, provide the subject of the record and the resident with a copy of the criminal record, and allow 10 days in which to request a hearing. If a hearing is requested, the Authority must give the family an opportunity to dispute the accuracy and relevance of the record at the hearing.

G. Notice to terminate lease. A family may unilaterally terminate a lease after tenancy under the lease for at least one year. The family must give the landlord and Authority the length of notice required by the lease, but no less than 30 days. A lease may not require a notice period of more than 60 days. Failure to provide sufficient notice to either the landlord or Authority is a breach of the family’s obligations and may result in termination of assistance to the family.

H. Maintenance of resident-paid utilities. A family has an obligation to pay for all utilities for which it is responsible under the lease. If a utility for which the family is responsible is disconnected or otherwise unavailable due to non-payment or other family-caused reason, the family will be given a maximum period of time to get service restored or their rental assistance will be terminated. If the Authority, in its sole discretion, determines that the absence of a utility is “life-threatening,” the family will be given 24 hours to have service restored. In other cases, 45 days will be allowed.

If a hearing is requested regarding the termination of assistance for utilities off, first time offenders whose utility or utilities have been off for less than three (3) months may continue receiving assistance if the utility is back in service by the day of their hearing. Clerical staff will check with the utility in question to see if the utility was on by the day of the hearing. Additional time will not be given. However, if this is the second time any tenant paid utility has been off for non-payment, since they have been on the program, termination will follow, whether or not the utility is back in service.

For purposes of this section, “life-threatening” always includes a loss of utility service that prevents the primary source of heat from being created or distributed throughout the dwelling unit in any calendar month in which the historical average low temperature is below freezing. Such months are December, January and February. The loss of heat-related utilities in other months, and the loss of non heat-related utilities in any month, is generally not considered “life-threatening.” However, the Authority may consider all circumstances and has the sole discretion to make a determination of “life-threatening” as it deems appropriate.

If a family is terminated for non-payment of utilities, they may reapply if the list is open. But they will not be able to receive rental assistance again until and unless they produce a letter from the affected utility(ies) stating they will be able to have service restored in their name.

I. Lease violations. The Authority must terminate assistance whenever a family is evicted from a unit assisted under the HCV program for a serious or repeated violation of the lease. Incidents of actual or threatened violence, dating violence, or stalking may not be construed as serious or repeated violations of the lease by the victim or threatened victim of such violence or stalking. A family will be considered evicted
if the family moves after a legal eviction order has been issued, whether or not physical enforcement of the order was necessary.

If a family moves after the owner has given the family an eviction notice for serious or repeated lease violations but before a legal eviction order has been issued, termination of assistance is not mandatory. However, HASLC will determine whether the family has committed serious or repeated violations of the lease based on available evidence and may terminate assistance.

Serious and repeated lease violations will include, but are not limited to, unauthorized occupants, nonpayment of rent, disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises and criminal activity. Generally, the criteria to be used are whether the reason for the eviction was through no fault of the tenant or guests.

The Authority will generally allow a reasonable time, not to exceed 60 days for a resident to pay amounts due under the lease or judgment before terminating a resident's assistance. Written documentation from the landlord will be required. If the resident's lease has expired, the resident must vacate the unit so as not to incur further rent owed.

In cases where a judgment or legitimate agreement is received from a current or prior landlord for monies due under the lease, the Section 8 resident will be notified that the household will not be recertified unless the judgment is paid in full or payments have been made in accordance with the agreement.

J. Violation of Continuing Responsibilities. The Authority may terminate a family's participation in the program if the head of household or other family members fail to fulfill any of their continuing responsibilities listed in Section VI.A above. With respect to a participant's obligation to report to the Authority information concerning, among other things, change in household income and change in household size, the obligation is the participant's and this obligation is not satisfied by the Authority receiving such information from its own investigation or from third parties, such as employers, landlords, or other governmental authorities. The Authority receives income and demographic information from a variety of sources throughout the year and caseworkers are not expected to examine this information as it comes in and compare it with the information provided by participants. Caseworkers re-examine third-party information about a participant during the certification and recertification process or when contacted in writing by the participant with new information, such as a change in income or household size. With respect to household income, the Authority has determined that in most cases it is not possible for a family to survive for 6 months with zero or very low income (defined as less 80% of what is paid under Missouri TANF) (referred to herein as Zero Income). Consequently, in such Zero-Income cases, the Authority may make additional inquiries concerning how the family pays its expenses and possible undisclosed additional sources of income. If the Authority concludes that a participant is not truthfully disclosing to the Authority all of his or her sources of income or how the family's expenses are being paid, the Authority may conclude: (a) that the participant is lying to the Authority; and (b) that the participant has failed to comply with his or her continuing responsibility to report household income; and may terminate the family's participation in the program on those grounds.
Section VII - Landlord Responsibilities

A. Continuing responsibilities. Landlords participating in the Housing Choice Voucher Program have the following continuing responsibilities:
   a. maintaining unit in conformance with HQS*,
   b. keeping landlord-paid utilities in service,
   c. timely reporting of move-outs, and
   d. abiding by any further requirements imposed by the Housing Assistance Payments Contract, law or regulation.

* Note: The HA inspector may issue a twenty-four (24) hour notice of termination to the landlord if any of the following (but not limited to) life-threatening situations are found:
   - The smell of natural gas
   - Signs of potential structural collapse
   - Unsafe condition that has the potential of starting a fire
   - Sparking electrical system
   - Main plumbing line back-up or flooding
   - No heat when outside temperature is less than 40 degrees for more than a 24-hour period
   - Any condition which seriously adversely affects the health, welfare or safety of the resident.

B. Disapproval of owner. The Authority may refuse to approve any or all units an owner requests to include in the Housing Choice Voucher Program (this is not an exclusive or exhaustive list):
   - when it is informed by HUD that the federal government has instituted an administrative or judicial action against the owner for violation of the Fair Housing Act or other federal equal opportunity requirement, and such action is pending,
   - when a court or administrative agency has determined that the owner violated the Fair Housing Act or other federal equal opportunity requirement,
   - if the owner has committed fraud, bribery or any other corrupt or criminal act in connection with a federally-assisted housing program,
   - if the owner has engaged in drug-trafficking, manufacture, sale or distribution of narcotics,
   - if the owner has a history of violating Housing Quality Standards,
   - if the owner has not paid any lawful taxes, fines or assessments, or
   - if the owner fails to abide by provisions of Section VII A, above.

C. Concealable and Other Weapons. It is the policy of the Housing Authority of St. Louis County to discourage – to the maximum feasible extent – possession of concealable and other weapons from all federally-assisted property. To implement this policy, the Authority strongly suggests that all participating Section 8 landlords take the following actions:
   • Adding a clause to their lease which prohibits all concealable and other weapons from their properties.
   • Posting notices in public access areas of their properties – such as driveways, entryways and hallways – notifying all persons of the prohibition against bringing concealable and other weapons into their properties.
   • Making sure that their residents know the prohibition against concealable and other weapons covers visitors and guests, too.

This policy is included in landlord packets and will be discussed with new and existing landlords at monthly landlord meetings.

D. Payments to Landlords. All payments to landlords will be made only by direct deposit or by check pick up from the Housing Authority by the landlord, with identification, or a representative of the landlord, with identification. These arrangements are consistent with Housing Authority policies for all Housing Authority vendors. The Housing Authority may terminate landlords from the Section 8 program who refuse to accept payment according to this policy.
Section VIII - Annual and Interim Reviews and Recertification

Clients are scheduled to be recertified at least 60 days prior to the expiration of their lease and HAP Contract. Clients are recertified annually or more often if necessitated by the termination of their unit.

The Authority will schedule an appointment for a client to be certified or recertified. If the client fails to keep the appointment for any reason, a second appointment will be scheduled. Except as described below, if the client fails to keep the second appointment, he or she may be terminated.

A third appointment may be scheduled if the reasons the client missed both of the first two appointments were beyond the client's ability to control or prevent, and the client gave prior notice to the Authority that they could not keep both of the first two appointments. The decision to schedule a third appointment is solely within the discretion of the Authority. If a client fails to keep a third appointment for any reason, he or she will be terminated.

A client will have 30 days from the date of his or her appointment to complete all steps necessary to receive, or continue to receive, rental assistance. If a client fails to do so within this time period, except for good cause as determined solely by the Authority, he or she will be terminated.

Families are required to report any change in their income within 10 days of the effective date of the change. Interim re-exams are conducted whenever an increase or decrease of more than $25/month occurs. For decreases, the change is based on when the client provides the information – the change is processed within two weeks of our receipt and is effective the following month. For increases, families are given 30 days advance notice. The resident and landlord are sent written notice of all changes.

Seasonal Employees – When annual income cannot be anticipated for a full twelve months, HASLC will use one of the following methods:

- **Method 1** Annualize current income, and conduct an interim reexamination when the income changes.
- **Method 2** Calculate the actual anticipated income from all known sources for the entire year. This means there will be no interim reexamination when the income changes as already anticipated. However, to use method 2, a history of the individual’s income from past years is needed. The method cannot be used when the future income source is “unknown” or “none”.

All information relative to gross family income and assets will be verified and all verified findings will be documented and recorded. To the extent feasible, staff will use Enterprise Income Verification (EIV) methods to verify client income. Additional verification methods – including those listed below – may also continue to be used. Staff will investigate and resolve substantial differences between EIV income and income reported through other methods. Resolution may include using a repayment agreement and/or termination of assistance.

**Employment** – Client will bring in letter from employer on original letterhead with an original signature on the letter. Client will also bring in three consecutive check stubs. Staff will call personnel office and verify wages and check stubs. If employer will not verify information, staff will determine if employer is on fax-back list and fax the income verification form. Staff will initial and date all income verification and indicate to whom they spoke and the date of the conversation.

Staff will average the last three consecutive check stubs to determine income; however, year-to-date gross wages may be used if sporadic overtime or bonus income appears on any of the last three consecutive check stubs.

Income tax returns will be requested from all clients, or if client states he/she did not file, they will be required to produce a non-filing document to verify.
Self Employment – Staff will request tax returns, receipts and other pertinent records from client.

TANF – An original letter from DFS will be requested from the client. Staff will also call the toll-free number to verify information and document the call with name, amount, date and signature.

Social Security letter – Staff use the EIV system for verification.

Bank statements – Bank statements will be requested from the bank if the bank will provide them at no cost. If this is impossible, staff will request 3 recent bank statements from the client and copy, sign and date them.

Child Support – Staff will obtain the 8-digit case number from the client, child support order or child support print out. Staff will call the toll-free number and document the last three payments to the client and will sign and date all pertinent forms.

Annual income is the gross amount of income anticipated to be received by the household during the twelve months after certification or recertification. Gross income is the amount of income prior to any HUD-allowable expenses or deductions and does not include income which is excluded by HUD.

Prospects are required to sign an Authorization for Release of Information initially and at each recertification.
Section IX - Fraud and Program Abuse

A. Resident. Among other sources, HASLC utilizes EIV methods, the HUD-established computer-based Resident Eligibility Verification System for obtaining Social Security benefits, Supplemental Security Income benefit history, resident income reports, and Internal Revenue Service tax returns to verify income.

If the Housing Authority suspects resident fraud, the caseworker will conduct an investigation concerning the matter. If any data is derived from this investigation, the caseworker will then determine if fraud has been committed. If the evidence indicates that fraud has occurred, the caseworker will send out a proposed termination form, giving the client the right to a hearing.

A client must report all material facts that would affect his or her rental assistance to the Authority in a timely manner. Failure to do so may result in termination of assistance, referral for collection, referral for criminal prosecution, and/or other remedies including, but not limited to, referral to the Regional Inspector General for Investigation, U.S. Department of Housing and Urban Development, U.S. Attorney and/or local prosecutor.

If the Authority discovers unreported income resulting in an overpayment of rental assistance, the Authority may, in its sole discretion, offer to enter into an agreement with the client to repay the amount owed.

For debts exceeding $3,000.00, or in other circumstances solely within the Authority's discretion, no agreement will be offered. In cases when an agreement is offered, the amount owed will be divided into 1 to 18 equal monthly installments. The minimum monthly installment will be the lesser of $50 or the total amount owed.

If such an agreement is offered, refusal to enter into such an agreement or failure to make a payment when due under such an agreement will result in termination of assistance, referral for collection, referral for criminal prosecution, and/or other remedies. If the client incurs a second debt, no agreement will be offered for the second debt. Termination will occur if the second debt is not paid in full.

HASLC’s calculation of a client's rent is based on the income reported by the client to HASLC. A client who reports income to the IRS that exceeds the income reported to HASLC should expect to find his/her rent based on the higher reported income. If the overpayment by HASLC exceeds $3,000.00, the client will be terminated from the program for fraud and program abuse. If the overpayment is under $3,000.00 and there is no other pending agreement, the client will be offered a repayment agreement.

If it can be justified, a termination may be avoided if the client persuades HASLC that they were a victim of fraud with respect to filing a tax return claiming a higher income than actually earned by the client. To avoid termination, as a victim of fraud, the client must:

1. file an amended return with the IRS, within 30 days, correcting the income reported by the client so that it reflects the client’s actual income and provide a copy, from the IRS, of the amended return;
2. provide HASLC with detailed information supporting the client’s claim that he/she was the victim of fraud with respect to the tax return, including, but not limited to the name of the person or persons who prepared the tax return or otherwise participated in the fraud; the address or location where the client met with or otherwise dealt with such person or persons; and all telephone numbers, email addresses and other means of communication by which one is able to contact the person who participated in the fraud.
3. HASLC will use its best judgment in determining whether a client was a victim of fraud, and is not required to find them a victim of fraud, even if the client performs all of the actions described in this section.
4. If the client files an amended return, within 30 days, HASLC will use the income reflected in the amended return in preference to the income reflected in the original, fraudulent return, in determining the tenant's share of the rent for the applicable time period.
5. If a client files a fraudulent tax return with the IRS after having a specific communication with HASLC about this issue, HASLC may terminate the client’s continued participation in the program.

The Authority may also deny or terminate assistance if the family engages in, or threatens to engage in, violence against the Authority or Authority personnel.

In any case of fraud or program abuse, the Authority may - in its sole discretion - authorize assistance or continued assistance for certain family members while denying or terminating assistance for other family members who bear a greater responsibility for any infraction(s).

B. Landlord. When the Housing Authority learns of fraud by the landlord, they will attempt to gather as much evidence as possible. The Housing Authority will then contact the landlord (and resident, if involved) and call the party(s) in for a conference or hearing. Based on the outcome of such, the Housing Authority will attempt to recoup overpayment by agreement or prosecution. The Housing Authority will also refer the matter to the Regional Inspector General for Investigation, U.S. Department of Housing and Urban Development. Also see Section VII - Landlord Responsibilities, B. Disapproval of owner, above.

C. Staff. If the Housing Authority learns of program fraud by an employee, the Housing Authority will take prospective measures as well as terminate the employee.
Section X - Payments for Resident-Caused Damages, Unpaid Resident Rent and Vacancy Loss

Claims related to properties in the Housing Choice Voucher Program are not eligible for reimbursement from the Authority for resident-caused damages, unpaid resident rent or vacancy loss. However, such claims related to properties in the Moderate Rehabilitation Program are eligible for such payments.

In general

All claims must be made in a "timely manner."

For claims related to resident-caused damages and unpaid resident rent, "timely manner" means no later than 30 days after the date the resident vacated their unit, or the last date a Housing Assistance Payment was due and payable, whichever comes last.

For vacancy loss claims, "timely manner" means no later than 30 days after the date the unit was re-rented, or 90 days after the last date a Housing Assistance Payment was due and payable, whichever comes first. Vacancy loss is paid only in cases where the resident vacated in violation of the lease.

Claims will be reduced by amounts received or entitled to be received from other sources, including payments from the resident and security deposit.

Since amounts paid pursuant to claims for resident-caused damages are a legal liability of the resident to the Authority - and may ultimately result in the termination of rental assistance - the resident has the right to request an informal hearing to appeal such claims.

All decisions of the Authority are final.

Resident-caused damages and unpaid resident rent

The landlord should call the Evaluation Department to schedule a damage inspection at a mutually convenient date and time. Evaluation will mail the landlord an Owner's Certification for Damages and Unpaid Resident Rent form. The landlord must complete this form and bring it with him or her to the inspection, or mail it in. The landlord must also immediately write a letter to the previous resident stating the date and time of the inspection, and informing the resident that he/she has a right to attend. The landlord must also bring a copy of this letter to the inspection, or mail it in. (If the landlord does not have the previous resident's new address, the original letter should be addressed to the unit he/she just vacated.)

The Authority has compiled a standardized list of damages and amounts payable for same. At the inspection, the Evaluator will complete the form. Both the Evaluator and the landlord will execute their required certifications. It is no longer necessary for the landlord to submit receipts and bills. From time to time, the standardized list of damages will be updated to reflect new items and/or prices.

The maximum amount payable for resident-caused damages (including unpaid resident rent, if any) is the lesser of the amount of damages, or two month's contract rent minus the greater of the security deposit collected, or the security deposit which could have been collected under HUD regulations.

To qualify for reimbursement of unpaid resident rent, the landlord must send copies of all collection letters and bills to the resident. The landlord must also submit a copy of the rent ledger, demonstrating that no rent has been received.

Vacancy loss

If a resident vacates a unit in violation of the lease, a landlord may be entitled to vacancy loss payment.
The landlord may keep the Housing Assistance Payment for the calendar month in which the vacancy occurred. If the vacancy continues into the following calendar month - and the landlord demonstrates that reasonable efforts have been made to re-rent the unit - the landlord may receive 80% of the contract rent prorated to that portion of the month during which the vacancy lasts.

The landlord is not entitled to any vacancy loss unless he/she
- complies with applicable law, regulation and provisions of the Housing Assistance Payments Contract,
- notifies the Authority immediately upon learning of the vacancy,
- takes all feasible actions to fill the vacancy including (but not limited to) contacting prospects on the landlord's waiting list (if any), requesting that the Authority refer eligible prospects and advertising the unit's availability, and
- does not reject any prospect except for good cause, acceptable to the Authority, pursuant to federal requirements.
Section XI - Informal Hearings

The Authority may deny or terminate assistance for a prospect or participant whenever it determines - in its sole discretion - sufficient reason exists. Denial and termination specifically include failure to approve a preference determination or inclusion on the waiting list, non-issuance of a Voucher, refusal to enter into a new HAP contract or approve a lease, termination of payments under an existing HAP contract, refusal to process portability requests or provide assistance under portability procedures, etc. (These are examples not an exhaustive list.)

The Authority is not required to provide an opportunity for an informal hearing to prospects:
- to review discretionary administrative determinations or to consider general policy issues or class grievances;
- to review the Authority's determination of the number of bedrooms entered on the Voucher;
- to review the Authority's determination that a unit located by a Voucher holder does not comply with the Authority's housing quality standards or the Authority's determination not to approve the lease for the unit; or
- to review the Authority's decision not to approve a request by a Voucher holder for an extension of the term of the Voucher.

The Authority is not required to provide an opportunity for an informal hearing to residents:
- to review discretionary administrative determinations or to consider general policy issues or class grievances;
- to review the Authority's determination that a unit does not comply with the Authority's housing quality standards, that the owner has failed to maintain or operate a contract unit to provide decent, safe and sanitary housing in accordance with the housing quality standards (including all services, maintenance and utilities required under the lease), or that the contract unit is not decent, safe and sanitary because of an increase in household size or change in household composition;
- to review a decision by the Authority to exercise any remedy against the owner under an outstanding contract, including the termination of housing assistance payments to the owner; or
- to review the Authority's decision not to approve a household's request for an extension of the term of the Voucher issued to an assisted household which wants to move to another dwelling unit with continued participation in the Section 8 program.

- if the Resident has defaulted on a repayment agreement he/she signed specifically waiving any right he/she might otherwise have to a termination hearing.

Conduct of informal hearings

The informal hearing shall be conducted by any person or persons designated by the Authority, other than a person who made or approved the decision under review or a subordinate of such person.

Hearings may be attended by a hearing officer and the following applicable persons:
- A PHA representative(s) and any witnesses for HASLC
- The resident and any witnesses for the resident
- The resident’s counsel or other representative
- Any other person approved by HASLC as a reasonable accommodation for a person with a disability

In all cases where a hearing is required, the Authority shall proceed with a hearing in a reasonably expeditious manner.

At its own expense, the family may be represented by a lawyer or other representative.

The family has a pre-hearing right to discovery of relevant Authority documents, including the right to examine their file. A file may only be reviewed at a mutually agreeable time and under the supervision of Authority personnel. The family may not remove files or documents from the Authority’s offices.
Pursuant to the family’s request, the Authority will copy relevant documents at the current per-copy and/or hourly rates then in effect. The family must pay any such charges in advance. The Authority has a parallel pre-hearing right to discovery of relevant family documents. The family must produce same at the Authority’s offices prior to the hearing. The Authority may not rely on any document that the family requested to be copied but was withheld from copying. The family may not rely on any document that the Authority requested but was withheld.

The person who conducts the hearing may regulate the conduct of the hearings. Failure to comply with the directions of the person conducting the hearing to obtain order may result in exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting or denial of the relief sought, as appropriate.

The Authority and the participant shall be given the opportunity to present written and oral evidence, and may question any witnesses. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

The person who conducts the hearing shall issue a written decision, within a reasonable amount of time, stating briefly the reasons for the decision. Factual determinations relating to the individual circumstances of the participant shall be based on the evidence presented at the hearing. A copy of the hearing decision shall be furnished promptly to the participant.

Tape recorders, etc., are not allowed at the hearing. However, the Authority will make a written record of the hearing.

Rescheduling informal hearings

Timely first requests to reschedule an informal hearing will generally be granted when:
- a client experiences a serious, unforeseeable and documentable problem which would reasonably preclude his/her attendance at the scheduled hearing, or
- a client's legal representative has a court appearance or other serious and specific time conflict which cannot be rescheduled and which would reasonably preclude his/her appearance at the scheduled hearing.

Requests to reschedule an informal hearing will generally not be granted when:
- a client is, or has a history of, acting in an irresponsible or uncooperative manner,
- a client's legal representative's problem is, at root, a failure to prepare for the hearing,
- the timeliness of the hearing is of particular importance in the opinion of the Authority,
- the hearing has been previously rescheduled, or
- the request to reschedule is made on or after the scheduled date of the hearing.

Force of hearing decisions limited

The Authority is not bound by a hearing decision:
- concerning a matter for which the Authority is not required to provide an opportunity for an informal hearing;
- in excess of the authority of the person conducting the hearing, or
- contrary to HUD regulations or requirements, or otherwise contrary to Federal, State or local law.

If the Authority determines that it is not bound by a hearing decision, the Authority shall promptly notify the participant of the determination, and of the reasons for the determination.
Section XII - Resident Moves and Inter-Program Transfers

A. Term of lease. The initial term of a lease must be for at least one year. A lease terminates upon any of the following:
- the owner terminates the lease,
- the resident terminates the lease,
- the owner and resident agree to terminate the lease,
- the Authority terminates the associated HAP contract,
- the Authority terminates assistance for the family, or
- the lease term expires.

The term of the lease and the HAP contract are the same: the term of the HAP contract follows the term of the lease. The lease ends when the HAP contract ends and the HAP contract ends when the lease ends.

The owner may offer a family a new lease for a term beginning at any time after the initial term of an old lease. The owner must give the resident at least 60 days written notice of the offer.

B. Moves with continued assistance. A family may move to a new unit if
- the assisted lease for the old unit has terminated; this includes situations when the Authority has terminated the HAP contract due to an owner’s breach, and when the lease was terminated by mutual agreement, or
- the resident has given notice of lease termination (if the resident has a right to terminate the lease on notice to the owner, for owner breach, or otherwise). Assistance may not continue if the eviction or notice to vacate is resident caused, or if the resident is not in good standing with either the Landlord or the Authority.

The Authority may prohibit more than one move by the family - either inside the Authority’s jurisdiction, or under portability procedures - during any 12-month period.

Families will generally not be allowed to transfer their assistance during the initial term of the lease. Exceptions to this policy may apply if the family can demonstrate an extraordinary reason outside of their control, the move is required due to a medical emergency, the move is needed as a reasonable accommodation to a family member with disabilities, there is a change of ownership and the HAP contract is not assigned to the new owner, or the move is the result of a family member being the victim of domestic violence, dating violence or stalking. The family will also be permitted to move if it receives a valid landlord notice to terminate the family’s tenancy after the lease term, provided the family has not committed serious or repeated lease violations.

Families will not be transferred unless the lease was properly terminated after the initial term of the lease in accordance with the lease by either the resident or landlord.

HASLC will deny the family permission to move if:
- the family has violated a family obligation, or
- the family owes HASLC or another PHA money. A housing supervisor may make exceptions to these restrictions as reasonable accommodation or if there is an emergency reason for the move over which the participant has no control, as long as the participant is current on his/her repayment agreement and the family is not moving outside the HASLC jurisdiction.

C. Portability. Under portability provisions, a family may move to anyplace in the U.S. that is under the jurisdiction of a Housing Authority.

A family may only lease a unit under portability during the first year after admission if either the head of household or spouse already had a domicile (legal residence) in the jurisdiction of the initial Authority at the time the family submitted an application for participation. For purposes of this section, transient occupancy does not constitute legal residence. If the legal residence requirement is not met, the family does not have a right to portability during the first year of assisted occupancy. In this case, the family may still...
move outside the initial Housing Authority jurisdiction but only if both the initial and receiving Housing Authorities voluntarily agree to such a move.

If HASLC is the initial Housing Authority, HASLC will be responsible for determining whether the family is income eligible for participation in the jurisdiction to which the family wants to move. If the family is not a current participant, the applicable income limit is the income limit for the area to which the family wants to move. The family may only use a Voucher to lease a unit in an area where the family is income eligible.

D. Overlapping assistance. The Authority may - in its sole discretion - overlap HAP payments if the term of an assisted lease for a new unit begins during the month a family moves out of an old unit. The overlap period may not exceed 30 days.

E. Leasing Authority-owned units. If a family wants to rent a dwelling unit owned by the Authority or any allied corporation or partnership, the family will be told - orally and in writing - that they are free to select any eligible unit. The Authority will not pressure or steer any client to an Authority-owned unit.
Section XIII - Operating Reserves

All expenditures of Operating Reserves of $25,000 or more will only be made with the specific approval of the Board of Commissioners. In granting such approval, the Board will make an affirmative determination that the expenditures are necessary and reasonable for other housing purposes consistent with state and local law.
Section XIV - Fair Housing / Equal Opportunity

A. Non-discrimination

The Authority provides for fair housing throughout its operations. No person shall be subjected to discrimination because of race, color, religion, age, sex, sexual orientation, marital status, handicap, familial status or national origin in the sale, rental or advertising of dwellings, in the provision of brokerage services, or in the availability of residential real estate-related transactions.

The protected class “national origin” extends to Limited English Proficiency (LEP) individuals. Those who fall into the LEP category are persons who do not speak English as their primary language and who are limited in their ability to read, write, speak, or understand English.

The Authority has added a “Language Preference Selection Form” asking prospects and residents in ten different languages to verify “I understand English and do not need an interpreter.”

PHA staff will arrange for an interpreter in the appropriate language as needed.

While sexual orientation, gender identity, and marital status are not considered “protected classes” under the fair housing act, regulations do extend protection to these groups in housing at the federal level.

If a family claims they have been illegally discriminated against, the Authority will give the family information on how to file a housing discrimination complaint. The Authority may also make referrals to any appropriate fair housing agency. The Authority includes a discrimination complaint form in its resident packet.

The Authority encourages landlords to make units available to Voucher program participants in all areas, including areas outside poverty and minority concentration. The Authority will provide a list of any known vacant and available handicap-accessible units upon the request of a family that includes a handicapped individual.

B. Poverty and minority deconcentration policy

The Authority specifically encourages Section 8 Voucher recipients to reside in areas with a low (40% or less) minority concentration and a low (20% or less) poverty concentration. To this end, the Authority:

a. counsels clients and provides written materials regarding the location of non-impacted areas, rental assistance portability, job opportunities, service availability, fair housing and resident/landlord law;

b. hosts and participates in meetings with landlords to publicize rental assistance programs, to recruit new landlords and to contract for additional units, particularly units outside of minority and poverty areas; and

c. uses Voucher Payment Standards not less than 100% of the published Fair Market Rents to maximize – within budgetary and programmatic limitations – the geographic area in which units are likely to be rented.

C. Family Self-Sufficiency Addendum

Any future openings for FSS Coordinator will be posted in the Authority's lobby, advertised in a newspaper of general circulation and in a minority newspaper.

All new Voucher recipients are offered the opportunity to get on the FSS waiting list including new Voucher recipients with disabilities and persons with limited English proficiency.

The Authority's headquarters and other offices are handicapped-accessible. It has a TTY phone number and utilizes such services as Deaf Interlink when necessary. It employs sign-language and other translators as necessary at no cost to clients.
The Authority briefs all new Voucher recipients on fair housing and makes referrals to fair housing agencies when warranted.

The Authority briefs all Voucher recipients on how to file a housing discrimination complaint and provides a HUD discrimination complaint form - which includes the HUD Discrimination Compliant Hotline Number - in the resident information packet clients receive.

The Authority encourages landlords to make units available to Voucher program participants in all areas, including areas outside poverty and minority concentration. The Authority provides a list of known, appropriately-sized vacant and available dwelling units to clients, including known handicapped-accessible units. The Authority also:

a. counsels clients and provides written materials regarding the location of non-impacted areas, rental assistance portability, job opportunities, service availability, fair housing and resident/landlord law;

b. hosts and participates in meeting with landlords to publicize rental assistance programs, to recruit new landlords and to contract for additional units, particularly units outside of minority and poverty areas; and

c. uses Voucher Payment Standards no less than 100% of the published Fair Market Rents to maximize - within budgetary and programmatic limitations - the geographic area in which units are likely to be rented.

The Authority records the race, ethnicity, familial status and disability status, among other attributes, of all of its clients and - within the limitations of its computer software - will generate and provide required FSS reports.
Section XV - Disclosure of Rental History

Upon written request in a form acceptable to the Authority, the Authority may provide a prospective landlord any of the following information as contained in the client file:

- the family’s current address,
- the name and address of the family’s current landlord,
- the name and address of the family’s previous landlord.

The Authority will retain a record of such requests, and the information provided pursuant to such requests, for a reasonable period of time.
Section XVI – Criminal Conviction History and Substance Abuse Records Management

The Director of Assisted Housing, the Director of Residential Properties and the Hearing Officer are responsible for implementing the following guidelines for management of two special types of client-related records:

(1) criminal conviction records received from law enforcement agencies, and
(2) records received from drug abuse treatment facilities.

Such records are used to make admit/deny decisions for initial participation or to make continuation/termination decisions for continuing participation. They will be used only for their intended purpose and will not be misused or improperly disseminated. They will be maintained in reasonable confidence and stored separately from regular client files in a designated area. Dated folders are used to facilitate record location and destruction.

If a decision is made to admit or to continue participation, records will be destroyed no later than 5 business days after the final decision is made. If a decision is made to deny admission or to terminate participation, records will be destroyed no later than 6 months after the last of the following events:

(a) the time to request an administrative hearing has elapsed,
(b) an administrative hearing decision has been rendered without commencement of litigation, or
(c) the final disposition of any decision-related litigation has been made.
Section XVII – Owner Access to Criminal History
For Prospect Screening, Lease Enforcement and Termination of Tenancy

The owners of rental dwelling units located in St. Louis County and assisted under certain federal housing programs may request that HASLC obtain and review criminal conviction records and/or sex offender registration information concerning an adult prospect or resident as follows:

(1) the owner of any federally assisted housing may request HASLC assistance in obtaining and reviewing sex offender registration information;
(2) the owner of a unit assisted under resident-based or project-based Section 8 assistance may request HASLC assistance with respect to sex offender information or other criminal records for the purpose of prospect screening;
(3) the owner of a unit assisted under project-based Section 8 assistance may request assistance with respect to sex offender information or other criminal records for purposes of eviction or lease enforcement.

An owner’s request must include – in a form acceptable to HASLC:

(1) a copy of a consent form signed by the member of a prospect’s or resident’s household who is the subject of the inquiry, and
(2)(a) the owner’s written standards for prohibiting admission of criminals or sex offenders subject to a lifetime registration requirement in accordance with 24 CFR 5.854 or 24 CFR 5.855, or
(b) the owner’s written standards for eviction of criminals or sex offenders subject to a lifetime registration requirement in accordance with 24 CFR 5.857 or 24 CFR 5.858, or
(c) the owner’s written standards for lease enforcement other than eviction against criminals or sex offenders subject to a lifetime registration requirement, and
(3) payment of a $75 fee – or other amount as may be established from time to time – to reimburse the Authority for its reasonable expenses in obtaining police records, staff time, overhead and administrative costs. (Note: the owner may not pass along this fee to residents or prospects.)

If the Authority determines that a criminal record or sex offender registration information reasonably forms a basis for owner screening, eviction or lease enforcement, it will notify the household of the proposed action, furnish a copy of any applicable criminal records or sex offender registration information to the person to whom the records or information pertains and to the prospect or resident, and provide a 10-day period in which the household may request a hearing to dispute the accuracy and/or relevance of the information.

The Authority will notify the owner whether it has received applicable criminal conviction records and, if so, whether such records reasonably form a basis for the proposed action. The Authority may release the actual criminal conviction records to the owner only if:

(1) the Authority determines that the criminal conviction records form a basis for eviction from a project-based Section 8 unit, and
(2) the owner certifies in writing that he/she will use the records only for the purpose of and only to the extent necessary to seek eviction in a judicial proceeding of a Section 8 resident based on the criminal activity by the household member described in the records.

The Authority will not release sex offender lifetime registration information to owners.
Section XVIII – Enterprise Income Verification (EIV) Records Access and Management

The Director of Assisted Housing, Director of Residential Properties, IT Manager and Purchasing Manager are responsible for implementing the following policies and procedures with respect to EIV information.

1) Appropriate online computer access to the EIV system will be granted only to those employees who have a job-related need to have such access, such as Caseworkers, Managers, Supervisors, Directors, IT personnel, etc. Such access will be promptly withdrawn when an individual no longer has a job-related need to have such access.

2) Caseworkers and Managers will insure that a Form HUD-9886 Authorization for the Release of Information / Privacy Act Notice – or its equivalent – is signed by each adult (18 or older) member of an assisted household and is filed in the client file.

3) All employees will be instructed and trained to lock their workstation or log off the HASLC network when they are away from their PCs.

4) Employees who handle files containing EIV information will be instructed and trained to keep such information reasonably private and secure, including not allowing unauthorized access to such information and by keeping such files in locked containers when not actually in use.

5) Keys to locking containers will be given only to appropriate employees, their supervisors and/or department directors. An Acknowledgment of Receipt of Keys will be executed by each employee receiving keys to containers that house EIV information. Such Acknowledgements and a master Key Accountability Record will be maintained by the Director of Assisted Housing and the Director of Residential Properties. Employees will be instructed and trained not to lend or give their keys to anyone.

6) When printed EIV information is determined to be no longer needed, employees will be instructed and trained to dispose of such information by secure means such as shredding or burning.

7) The Purchasing Manager will have all contractors who have access to areas in which EIV information is handled and/or stored to execute a Contractor Acknowledgment disclosing the prohibition against unauthorized inspection or disclosure of EIV information. The Purchasing Manager will maintain a file of such Acknowledgments.

8) The Director of Assisted Housing, Director of Residential Properties and IT Manager will conduct appropriate training sessions as needed for current and future employees concerning these policies and procedures for the handing of EIV information. They will keep a Security Awareness Training Attendance Record for all such training sessions.
Section XIX – Housing Choice Voucher Homeownership Program

The Administrative Plan – Housing Choice Voucher Homeownership Program is hereby incorporated by reference. If any conflict should arise between that Administrative Plan and this Administrative Plan for matters specifically concerning the Housing Choice Voucher Homeownership Program (HCVHP), the Administrative Plan – Housing Choice Voucher Homeownership Program shall prevail.
Section XX – The Violence Against Women Act (VAWA)

The Violence Against Women Act protects qualified residents and family members of residents who are victims of domestic violence, dating violence, or stalking from being denied admission and from being evicted or terminated from housing assistance based solely on acts of such violence against them.

Admission

A PHA, owner or landlord may not deny admissions to a prospect (male or female) who has been a victim or domestic violence, dating violence, or stalking, if the prospect otherwise qualifies for assistance or admission.

If the perpetrator is a member of the victim's household, HASLC will have the authority to require the individual to leave the household and still provide assistance to the remaining members of the household.

Termination

A PHA and owners are prohibited by VAWA from considering actual or threatened domestic violence, dating violence, or stalking as a cause for terminating the tenancy, occupancy, or program assistance of the victim. Specifically, this means that HASLC and owners may not construe such violence or stalking as a serious or repeated violation of the lease by the victim, as other good cause for terminating the tenancy or occupancy rights of the victim, or as criminal activity justifying the termination of the tenancy, occupancy rights, or program assistance of the victim.

If the perpetrator is a member of the victim's household, HASLC still has the authority to require the individual to leave the household as a condition of providing continued assistance to the remaining members of the family.

If a resident is in good standing with the landlord and HASLC and the resident/victim must relocate to protect the health and safety of the victim of domestic violence, dating violence or stalking they may move to another location even though they are breaking the lease when doing so. The victim must have a reasonable belief and proof that he or she is imminently threatened by harm from further violence if he or she remains in the present unit.

Certification of Abuse and Confidentiality

A PHA, owner, or manager may request an individual to certify that the individual is a victim of abuse and that the incidences of abuse are bona fide. The certification must be in a form acceptable to HASLC, must include the name of the perpetrator and any other statutorily required information, and the victim must provide the certification within 14 business days after the individual receives a request for such certification from HASLC, owner or manager.

Without the certification, a PHA, owner, or manager may deny or terminate assistance. All information provided to a PHA, owner or manager is confidential. Notice of these rights must be given to residents. The victim may self-certify and the certification requirement may also be satisfied with documentation signed by an employee, agent or volunteer of a victim service provider, an attorney, or a medical professional from whom the victim has sought assistance in addressing domestic violence, dating violence, or stalking or the effects of the abuse in which the professional attests under penalty of perjury (28 U.S.C. 1746) to the professional's belief that the incident or incidents in question are bona fide incidents of abuse, and the victim of domestic violence, dating violence, or stalking has signed or attested to the documentation. The statue also allows for the certification requirement to be satisfied by producing a federal, state, tribal, territorial or local police or court record.
Notification

HASLC must provide notice to residents assisted under section 8 of the United States Housing Act of 1937 of their rights, and notice to owners and managers of their rights and obligations, under section 8 as amended by VAWA.
The HCV regulations allow PHAs to deny families permission to move and to terminate Housing Assistance Payments (HAP) contracts if funding under the consolidated ACC is insufficient to support continued assistance. Insufficient funding may also impact HASLC’s ability to issue vouchers to families on the waiting list. This part discusses the methodology HASLC will use to determine whether or not HASLC has sufficient funding to issue vouchers, approve moves, and to continue subsidizing all families currently under a HAP contract.

HASLC will determine whether there is adequate funding to issue vouchers, approve moves to higher cost units and areas, and continue subsidizing all current participants by comparing HASLC’s annual budget authority to the annual total HAP needs on a monthly basis. The total HAP needs for the calendar year will be projected by establishing the actual HAP costs year to date. To that figure, HASLC will add anticipated HAP expenditures for the remainder of the calendar year. Projected HAP expenditures will be calculated by multiplying the projected number of units leased per remaining months by the most current month’s average HAP. The projected number of units leased per month will take into account the average monthly turnover of participant families. If the total annual HAP needs equal or exceed the annual budget authority, or if HASLC cannot support the cost of the proposed subsidy commitment (voucher issuance or move) based on the funding analysis, HASLC will be considered to have insufficient funding.

If HASLC determines there is a shortage of funding, prior to terminating any HAP contracts, HASLC will determine if any other actions can be taken to reduce program costs. If after implementing all reasonable cost cutting measures there is not enough funding available to provide continued assistance for current participants, HASLC will first recall unhoused vouchers (last issued, first recalled) before terminating HAP contracts as a last resort. The special purpose vouchers, Non Elderly Disabled (NED), Veterans Affairs Supportive Housing (VASH), and Family Unification (FUP) families will be the last to be recalled or terminated. Project-Based Moderate Rehabilitation is excluded from participation in these voucher reductions.

Prior to terminating any HAP contracts, HASLC will inform the local HUD field office. HASLC will terminate the minimum number needed in order to reduce HAP costs to a level within HASLC’s annual budget authority.

If HASLC decides to recall vouchers or terminate HAP contracts due to insufficient funding, HASLC will terminate vouchers and participants in the following order:

1. HASLC will recall vouchers issued to prospects from the waiting list that have not yet been approved for a unit on a “last-in, first-out” basis, with the most recently issued vouchers recalled first, except for special purpose vouchers (NED, FUP and VASH) which will be the last to be affected.

2. HASLC will terminate HAP contracts on a “last-in, first out” basis, with the most recently executed HAP contracts terminated first, with the exception of special purpose programs (NED, FUP and VASH) which will be the last to be terminated.

3. As funds become available, prior participants will be recalled in the reverse of the order terminated, on a “last-terminated, first-recalled” basis, with the last participant cancelled being the first offered reinstatement.

4. Once all prior participants have been recalled, vouchers will be reissued to prospects in the reverse of the order recalled, on a “last-terminated, first-recalled” basis.

5. Once all of the former prospects have had vouchers reissued to them, HASLC will return to its normal process of issuing vouchers to persons on the waiting list a voucher become available.
SAINT LOUIS COUNTY DEPARTMENT OF HUMAN SERVICES
HOMELESS SERVICES PROGRAM
HOUSING RESOURCES COMMISSION GRANT
BY AND BETWEEN
SAINT LOUIS COUNTY
AND
INSTITUTE FOR COMMUNITY ALLIANCES
CONTRACT# HRC-2017-01

THIS AGREEMENT, made and entered into this 1st day of January 2017 by and between SAINT LOUIS COUNTY, MISSOURI, hereinafter referred to as the "COUNTY" and Institute for Community Alliances, hereinafter referred to as the "SUBRECIPIENT."

WITNESSETH THAT:

WHEREAS, by St. Louis County Ordinance 22,497 The County levied a fee of Three Dollars ($3.00) for the recording of all instruments with the Recorder of Deeds of St. Louis County; and established a special fund for the financial assistance of agencies providing assistance to homeless persons, pursuant to the provisions of Sections 67.1062 through 67.1071, R.S.Mo. (1994); and established the St. Louis County Housing Resources Commission (hereinafter referred to as the “COMMISSION”), with authority to allocate and disburse the funds collected and appropriated pursuant to Sections 502.440 through 502.450 SLCRO 1974, as amended; and

WHEREAS, a Scope of Service, outlined below (Article II), describes the services for homeless persons the Sub recipient shall provide; and
WHEREAS, the SUBRECIPIENT has proven capability and experience in providing services to the Continuum of Care (CoC), and has the authority of the SUBRECIPIENT Board of Directors, as outlined in “Resolution Authorizing Contract”, and

WHEREAS, the COUNTY wishes to engage the services of the SUBRECIPIENT to carry out the services outlined in (II) Scope of Service;

NOW, THEREFORE, in consideration of the mutual covenants to be performed herein by the parties, it is hereby agreed.

ARTICLE I – TERM OF AGREEMENT

The term of this Agreement shall be from January 1, 2017, through December 31, 2017. SUBRECIPIENT shall provide all services for the full 12 (twelve) month period. SUBRECIPIENT may request permission from the Director of the Department of Human Services to extend the length of this agreement. Such request must be in the form of a signed letter on agency letterhead received by DHS no later than September 30, 2017. If the request is approved, DHS shall issue an amendment to this contract, indicating a new term of the agreement. Normally, the term of agreement will not be extended more than 90 days. Funds not requested within 30 days after the end of the agreement period will be recaptured.

ARTICLE II – SCOPE OF SERVICES

2.1 Services. SUBRECIPIENT shall provide specific services as described in EXHIBIT A as well as abide by other requirements enumerated in the remainder of this contract.

2.2 Confidentiality, Privacy and Security. SUBRECIPIENT shall require that persons employed by or volunteering services to the agency maintain the confidentiality of any information that would identify individuals served by the SUBRECIPIENT pursuant to this
Agreement, as required by Section 67.1069(4) R.S.Mo. (1994). SUBRECIPIENT shall adhere to the requirements of the Federal Register Volume 69, Number 146, dated July 30, 2004 as stated in the "SAINT LOUIS COUNTY DEPARTMENT OF HUMAN SERVICES, HOMELESS SERVICES PROGRAM, HOMELESS MANAGEMENT INFORMATION SYSTEM PRIVACY AND SECURITY NOTICE MANUAL, Effective January 2006," available upon request from COUNTY.

2.3 Monthly Activity Reports. SUBRECIPIENT shall submit to COUNTY monthly reports documenting services provided. These reports must be in a format approved by COUNTY, and are due no later than the 30th day following the month for which reimbursement for these services is requested. Monthly expenses shall not be reimbursed until said documents are submitted.

2.4 Network Participation. SUBRECIPIENT agrees to support and work toward implementing the goals of the CoC Network by attending each monthly Continuum of Care Meeting. In addition, the Director or first Executive Assistant agrees to attend the monthly CoC Meetings and become a member of one of the Continuum Committee meetings. SUBRECIPIENT shall cooperate with COUNTY to document need and secure new and expanded resources to serve the homeless, including development of creative plans and approaches to address the needs of the homeless.

2.5 Acknowledgement. SUBRECIPIENT shall acknowledge funding from the COUNTY by printing the Saint Louis County Department of Human Services’ logo on all printed materials funded by this grant.

2.6 Public Relations Approval. All press releases and/or printed materials, brochures, newsletters, workshops, seminars, etc., discussing the project being funded with this grant MUST be approved by COUNTY.
2.7 Inclusion. SUBRECIPIENT agrees that, to the maximum extent practicable, homeless individuals and families will be involved in constructing, renovating, maintaining and operating facilities and in providing services for occupants of this facility.

2.8 Other Requirements. SUBRECIPIENT shall comply with all federal regulations, state statutes, and local ordinances and St. Louis County policy applicable to the services performed under this Agreement including, but not limited to, the Americans with Disabilities Act, As Amended, Section 504 of the Rehabilitation Act, As Amended, and those requirements delineated in EXHIBIT A, and amplified in EXHIBITS B, C, D, E, F, and G, all of which are attached hereto.

SUBRECIPIENT shall maintain personnel manuals and/or client handbooks to include, but not be limited to, those statements outlined in Exhibits C, D, E, F, and G, of this Agreement.

2.9 Program Monitoring. SUBRECIPIENT is subject to monitoring of Program by COUNTY staff. SUBRECIPIENT shall be available for on-site visits from COUNTY staff at reasonable times as COUNTY may establish during the term of this agreement or not more than two years after the end of this agreement. Program monitoring visits evaluate compliance with federal, state and/or local regulations and requirements.

ARTICLE III – COMPENSATION

3.1 Compensation. The COUNTY agrees to reimburse the SUBRECIPIENT an amount not to exceed $75,000.00 (Seventy Five Thousand Dollars and zero cents) for services as outlined in Article II, Scope of Services and related EXHIBITS.

3.2. Budget. The SUBRECIPIENT shall expend funds as prescribed in the Budget, hereto attached as "EXHIBIT H."
3.3 Reimbursement Procedures. SUBRECIPIENT shall comply with Reimbursement Procedures and Financial Standards as stipulated in the most recent version of the “SAINT LOUIS COUNTY DEPARTMENT OF HUMAN SERVICES, HOMELESS SERVICES PROGRAM, SUBRECIPIENT REQUEST FOR REIMBURSEMENT MANUAL,” which is available upon request from COUNTY.

ARTICLE IV. -- GENERAL TERMS AND CONDITIONS

4.1 Nondiscrimination in Provision of Services. SUBRECIPIENT shall not unlawfully exclude persons from services or employment under this Agreement on the basis of sex, religion, race, national origin, age, disability, familial status, or veteran status. Additionally, SUBRECIPIENT shall comply with the Americans with Disabilities Act, As Amended, the Fair Housing Act, As Amended, and the Rehabilitation Act, As Amended as these pertain to non-exclusion of services related to any status covered by those acts.

4.2 Waiver. Failure of the COUNTY or SUBRECIPIENT to insist on performance of any of the terms of this Agreement shall not be construed as a waiver of such terms and the same shall remain in full force and effect for the total Agreement term.

4.3 Venue. In the event any actions or proceedings are initiated with respect to this Agreement, the COUNTY and the SUBRECIPIENT agree that venue thereof shall be in Saint Louis County, Missouri.

4.4 Independent Contractor. The relationship of the SUBRECIPIENT to the COUNTY shall be that of an independent contractor and no principal/agent or employer/employee relationship is created by this Agreement.

4.5 Assignment of Agreement. The SUBRECIPIENT agrees not to assign, transfer, convey, sublet, or otherwise dispose of this Agreement without the previous consent and written approval of the COUNTY.
4.6 **Hold Harmless Agreement.** The SUBRECIPIENT agrees to be responsible for any personal injury or property damage liability, losses, costs, or expenses proximately caused by or resulting from the negligent acts or omissions of the SUBRECIPIENT or any of its officers, employees, volunteers, clients, residents, or sub-contractors in the performance of this Agreement.

**ARTICLE V – TERMINATION**

5.1 **Termination.** Termination of this Agreement may occur, with or without cause, prior to the date agreed upon by the parties herein in the following manner:

a. It is understood and agreed that in the event that funds from local sources are not obtained and continued at an aggregate level sufficient to allow for the purchase of the indicated quantity of services, the obligations of each party hereunder shall thereupon be terminated immediately upon receipt of written notice.

b. It is further understood and agreed that either party at any time, without cause, upon thirty (30) days written notice, may terminate this Agreement.

c. It is further understood and agreed that either party at any time may, with cause related to adequacy of performance, terminate this Agreement immediately by written notice.

5.2 **Delivery.** Any written notice of Agreement termination or renewal shall be sent by certified mail, first class, postage paid, and notice shall be effective by deposit in the mail. Notices shall be sent to:

1. Mrs. Andrea Jackson Jennings, Director
Department of Human Services
9666 Olive Blvd., Suite 510
St. Louis, MO 63132

2. Mr. David Eberbach, Executive Director
Institute for Community Alliance
2411 Hyde Park Road, Suite B
Jefferson City, Mo 65109
6.1 The following exhibits are attached hereto and made a part of this agreement:

(Exhibits F, G, and H are to be signed by any employee who will be reimbursed under this grant and attachments made available for review at the request of the Saint Louis County Homeless Services Program)

(Exhibit H: Budget and Match pages should be completed along with obtaining signatures of Executive Director or Administrator on contracts before returning them to St. Louis County Homeless Services Program for further processing.)

EXHIBIT A – Specific Scope of Services

EXHIBIT B – Additional Requirements

EXHIBIT C – Statement of Religious Activities Prohibition

EXHIBIT D – Agency Anti-Lobbying Statement

EXHIBIT E – Conflict of Interest Statement

EXHIBIT F – Policy Regarding Sexual Harassment

EXHIBIT G – Drug-Free Workplace Statement

EXHIBIT H – Budget
WHEREFORE, the authorized officials of the parties have affixed their signatures on the date first written above.

SAINT LOUIS COUNTY, MISSOURI

INSTITUTE FOR COMMUNITY ALLIANCES
By X ____________________________
Print David Eberbach
Title: Executive Director

ATTEST:
By X ____________________________
Print Kim Grandstaff
Title: Grant Manager

X ____________________________
County Executive

ATTEST:
By X ____________________________
Administrative Director

APPROVED AS TO LEGAL FORM:
By X ____________________________
County Counselor

APPROVED:
By X ____________________________
Director, Dept. of Human Services

I hereby certify that balances sufficient to pay the Agreement sum remain in appropriation accounts against which this obligation is to be charged, to the extent County continues to receive federal funds sufficient to pay the Agreement sum.

X ____________________________
Accounting Officer, Saint Louis County
SPECIFIC SCOPE OF SERVICES

ICA will serve as the HMIS Lead for the Saint Louis County Continuum of Care. As the HMIS Lead, ICA will be responsible for the day to day operation of the HMIS. ICA will respond to CoC directives, provide technical support to participating agencies, and ensure system integrity and availability. In addition, ICA will regularly review data quality and ensure that the HMIS software is capable of meeting the required reporting needs. ICA will work with the CoC to establish written HMIS policies and provide enforcement to ensure that the HMIS is compliant with HUD HMIS requirements. ICA will monitor and enforce HUD HMIS compliance for all agencies accessing the HMIS database.

➢  Training/Technical Assistance - Ensuring Complete and Accurate Data

Training and technical assistance will provided to all agencies and users enrolled in the St. Louis County HMIS system using a variety of methods. The primary goals of training will be to:

1)  Introduce New Users to HMIS

2)  Increase the user’s proficiency with HMIS.

3)  Discuss the HMIS security and privacy policies.

Training Sessions will be offered on a published schedule in the following areas:

- New User Group Trainings: Hands-on training conducted in a computer classroom where the new user can undergo initial HMIS software training. Some new user trainings will be conducted one-on-one depending on the role specificity. The HMIS trainer will decide who would benefit from this type of training.
- **Refresher Trainings:** Additional training offered to existing users for the purpose of increasing a user's HMIS knowledge and proficiency. These trainings are designed according to user role, program type, and user needs. Refresher trainings will be conducted either one-on-one or in a small group.

- **Report Trainings:** This training is designed for agency executives and administrative staff who use HMIS data for performance measurements, grant writing, and funding reports.

- **Guiding documents and other informational materials** will be available through MISI's website to provide on-going access to training and standards as well as contact information for one-on-one training. On-site training visits to all enrolled agencies will provide additional opportunities to meet technical assistance needs. On-site individual or group technical assistance and training visits to enrolled agencies will be provided on a case-by-case basis dependent on need.

➤ **Help Desk Assistance for Agencies**

Technical Assistance staff will be available to provide support and/or training via phone and email Monday through Friday from 6:00 a.m. to 5:00 pm CST. ICA staff will ensure that all requests for assistance from enrolled agencies and funders will be responded to within 24 hours of initial contact, with follow-up as needed until the issue or request is fulfilled. ICA provides a number of ways in which Users can get assistance in addressing their issues. Users can contact technical assistance three ways:

- Submit a help ticket while in the application
- Submit an email to the Support Team
- Contact the help desk staff directly through a local phone number
Administration and Coordination

ICA will work closely with the St. Louis County Department of Homeless Services staff and will provide system administration to 14 agencies of the County Continuum of Care with unlimited number of users and projects to ensure St. Louis County’s HMIS software meets the data collection and reporting needs of agencies and staff.
ADDITIONAL REQUIREMENTS

PERSONNEL MANUAL

SUBRECIPENT must establish a Personnel Manual containing at a minimum, policies which are currently in effect for the following:

1) Non-discrimination regarding hiring practices.
2) Prohibition of religious instruction, counseling and worship.
3) Drug-free workplace and description of a continuing, drug-free awareness program.
4) Conflict of interest avoidance for all employees, officers and board members.

PERSONNEL FILES

SUBRECIPENT must ensure that each Employee Personnel File contains the following statements signed by the Employee:

1) Prohibition against religious proselytizing which contains the information prescribed in EXHIBIT C.
2) Prohibition against lobbying activities which contains the information prescribed in EXHIBIT D.
3) Conflict of Interest Avoidance which contains the information prescribed in EXHIBIT E.
4) Prohibition of Sexual Harassment in the workplace which contains the information prescribed in EXHIBIT F.
5) Drug-free workplace policy which contains the information prescribed in EXHIBIT G.
6) Confidentiality policy which contains information prescribed in “SAINT LOUIS COUNTY DEPARTMENT OF HUMAN SERVICES, HOMELESS SERVICES PROGRAM, HOMELESS MANAGEMENT INFORMATION SYSTEM PRIVACY AND SECURITY NOTICE MANUAL, Effective January 2006.” (Applies to volunteers)

PHYSICAL FACILITY

SURECIPIENT shall comply with the following requirements:

1) The Americans with Disabilities Act, As Amended as it applies to the operation, maintenance and accessibility of the facilities or housing provided.
3) The HUD logo or the letters EOE must be displayed in all advertisements or publications bearing the agency’s name if they receive HUD funding (FESG, MESG, and
CoC);
4) Non-discrimination hiring policy, drug-free workplace program, minimum wage posting, and all other postings as required by local, state, and federal agencies must be displayed in a common area accessible to all employees.
5) When possible, employ homeless individuals and families in the construction, renovation, maintenance and/or operation of the facility.
6) The agency must demonstrate compliance with accessibility standards per the agency municipality or St. Louis County code requirements. Where applicable, appropriate and reasonable accessibility modifications must be made.
STATEMENT OF RELIGIOUS ACTIVITIES PROHIBITION

1. POLICY

As a recipient of COUNTY funding, Institute for Community Alliances, provides services to homeless individuals and/or families in accordance with the Rules and Regulations contained in 24 CFR Part 576 of the Tuesday, November 7, 1989 Federal Register published by the Department of Housing and Urban Development. Additionally, the Agency understands that this information will be contained in the personnel manual for the awareness of all employees, as well as the client manual for the awareness of those who are served by the Agency.

Any Subrecipient that either represents that it may be deemed a religious or denominational institution or organization operated for religious purposes, or any Subrecipient that does not represent a religious or denominational institution or organization operated for religious purposes, shall:

a. not discriminate against any employee or applicant for employment on the basis of religion and will not limit employment or give preference in employment to persons on the basis of religion;

b. not discriminate against any persons seeking emergency shelter and related services on the basis of religion and will not limit such services or give preference to persons on the basis of religion;

c. not require religious instruction or counseling, religious worship or services, either to groups of persons or individuals receiving services from that organization/agency; not engage in religious proselytizing, nor exert other religious influence in the provision of services or the use of facilities or furnishing assisted in any way under this agreement.
AGENCY ANTI-LOBBYING STATEMENT

I. POLICY

In order to retain its tax-exempt status, Institute for Community Alliances, is prohibited from participation, intervention, or involvement, either directly or indirectly, in support of, or in opposition to any candidate for elective public office. In order that the Agency may be protected from the allegations that the private actions of its employees are in reality actions of this Subrecipient, employees, whether full-time, part time, or temporary, are prohibited from seeking elective public office.

Further, employees are prohibited from campaigning for others seeking elective public office without first having obtained the approval of the Agency. If such approval is given, all activities of the employee involved must follow guidelines designed to ensure this agency's tax exempt status is not jeopardized. It is consistent with the Agency’s programs and goals that employees accept appointive public office, especially offices of a temporary or part-time nature or non-partisan public service boards and commissions that seek to improve the social and economic conditions of the American citizenry. However, in order that the Agency’s tax-exempt status may be protected, an employee must obtain approval from the Agency before accepting an appointive public office. If such approval is given, all activities of the employee involved must be in accordance with the guidelines discussed in Section III and IV hereof, and with specific guidelines that must be issued for each particular case.

II. DEFINITIONS

Elective Public Office – as used in this procedure, the term "elective public office" refers to any position, at any level of government (including federal, state, county, municipal, school board), to which persons are elected by popular vote, including primary elections.

Interim Appointments to Elective Public office – any and all restrictions relating to an elective public office shall apply equally to an interim appointment, to a vacant elective public office when the appointment is to fill a vacancy that will later be subject to the normal election procedures governing that office.

III. PROCEDURES

A. In the event that an employee (1) decides to seek an elective office, (2) is considered for or received an interim appointment to elective public office, or (3) is appointed for an appointive public office, he shall communicate his intent to accept such position or take such action in writing to his immediate supervisor, and to the Board of Directors through the President, and shall take no action regarding such decision until a written directive has been received from the Board. Such communication shall include a complete explanation of the facts concerning the governmental position, the activities in which the
employee believes he will engage, and any other information he believes the Board should consider. Each level of supervision shall indicate in writing, to accompany the communication, his/her own knowledge of the facts surrounding the request as his/her recommendations.

B. In the case where an employee decides to seek elective public office, such employee will immediately submit his resignation from the Agency, effective no later than the date of the employee's official filing for office.

C. All other requests should be referred promptly to a committee, the composition of which shall be appointed by the Board of Directors, and such committee shall make a recommendation and issue additional guidelines to the Board.

D. Decisions on these requests must be based on the particular circumstances of each case. An employee's request may be granted if the Board can be assured that the private political activities of such employee can be kept completely separate from his/her activities as an employee. Employees must be cognizant of the fact that the circumstances of their particular activities may result in the request that employees take a non-paid leave of absence or resign, as the situation may demand.

E. At no time shall any Agency employee who is given permission to engage in campaign activities on behalf of another person seeking elective office, use his/her position with the Agency to support any person's campaign or endorse any person's elective.

F. From time to time the political involvement of an employee will be reviewed to assure that the tax-exempt status of the Agency is protected.

IV. PROHIBITED ACTION

No amount shall be paid or incurred by the Agency to influence the selection of candidates or the outcome of any election for elective public office. No facilities shall be used in any manner, which would directly or indirectly benefit any candidate for elective public office. Specifically, and without limiting the foregoing, the Agency shall not:

A. Participate in any campaign on behalf of, or in opposition to any person who is a candidate for elective public office.

B. Issue any statements orally or in any news release, endorsing or commenting on an election or candidate for elective or public office.

C. Use or permit its employees to use the Agency in connection with any campaign election or candidate for elective public office.
D. Use or permit its employees to use the facilities of the Agency, including office space, office machines, services, telephones, supplies, mailing facilities, etc., in connection with any election or candidate for elective public offices.

E. Permit any Agency employee to devote any time during the hours for which such employee is paid by the Agency to any activities in connection with any election or candidate for elective public office.

V. REQUEST RESPONSIBILITIES

Department/Project Director acquaints employees with the above policy and procedures. He/she carefully evaluates each request and makes recommendations and refers each request promptly to the next level of supervision. President makes a recommendation and ensures a Committee of the Board is convened to evaluate the request in a timely manner.
CONFLICT OF INTEREST STATEMENT

I. POLICY

All employees of Institute for Community Alliances are obligated to carry out their job duties for the sole benefit of the organization. Employees should avoid relationships where their personal interests may be in conflict with the interests of the Agency – and its clients or may impair their independence or judgment on behalf of the company. If it is determined that a conflict of interest occurs, the employee may be remanded accordingly or terminated.

II. PROCEDURES

A conflict of interest exists when the actions of an employee could involve (but are not limited to) an improper personal gain or advantage to the employee or if the actions have an adverse effect on the organization's interests. General areas of conflict of interest include, but are not limited to:

A. Financial Interest.
   1. Ownership by an employee of a financial interest in a business or firm from which the Agency obtains goods or services or which is a competitor of the Agency.

   2. Competition by an employee with the Agency in the purchase or sale of property or any property right or interest.

   3. Representation of the Agency by an employee in any transaction or activity in which the employee has a financial interest.

B. Confidential Information.
   Employees should not disclose or use confidential information about the Agency, its activities, intentions or clients.

C. Outside Activity.
   Employees should not represent themselves as a director, officer, agent, employee or member of another company, institution, agency, or organization in any activity that involves the Agency as an adverse party.

D. Gifts and Favors.
   1. Gifts and favors are not to be accepted from any business or individual who does or seeks to do business with or is a competitor of the Agency if such action is intended to influence the employee in the performance of their job duties.

   2. This does not include items of nominal value, as defined by state or federal laws and regulation, given for friendship or other reasons not related to a particular transaction of the Agency.
E. The Subrecipient director or other staff shall not be a member of the agency’s Board of Directors.
POLICY REGARDING SEXUAL HARASSMENT

All clients served by Institute for Community Alliances, are expected to be treated and to treat others with dignity and respect. Harassment of any kind, on the basis of race, color, religion, gender, national origin, ancestry, age, disability, sexual orientation, familial status, veteran status or any other basis protected by federal, state, or local laws will not be tolerated.

Sexual harassment is defined as unwelcome sexual advances. Although you may not have been a victim of sexual harassment, the fact is that 42% of women surveyed feel that they have been sexually harassed at one time or another. Men can be sexually harassed too, and it does happen.

Sexual harassment is not only limited to sexual assault. It can also include a threat, an obscene joke, an intimate touch, or a “look” that feels intimidating to others.

Examples of sexual harassment can include: touching, bumping, gesturing, patting, or requesting sexual favors; encouraging or displaying sexual literature or pictures for others to read or look at; and using obscene or sexually suggestive language that is offensive to others.

The key word in defining sexual harassment is unwelcome. When any unwanted, unwelcome, or unsolicited sexual conduct is imposed on a person who regards it as offensive or undesirable, it is sexual harassment. You need to remember that the recipient or receiver of the behavior and not the person “doing the behavior,” decides sexual harassment.

Sexual harassment in any form is not acceptable. Should anyone exhibit such behavior, please report it to a staff member immediately. Perpetrators are subject to criminal prosecution by the victim and should be reported to the police. They will be terminated from services. It is your right to expect that you will be safe and without fear of sexual harassment while a participant in this program.

I have read the statement above and I understand and agree to follow the policy contained herein.

Print Name: __________________________  Date: 11-29-16
DRUG-FREE WORKPLACE STATEMENT

Institute for Community Alliances, will provide a drug-free workplace in accordance with the Drug-Free Workplace Act of 1988 (41 U.S.C. 701) by:

(a) publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee’s workplace and specifying the action that will be taken against employees for violation of such prohibition;

(b) establishing an ongoing drug-free awareness program to inform employees about: (1) the dangers of drug abuse in the workplace; (2) the grantee’s policy of maintaining a drug-free workplace; (3) any available drug counseling, rehabilitation, and employee assistance programs; and (4) the penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

(c) making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will: (1) abide by the terms of the statement; and (2) notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

(e) notifying the agency in writing, within ten calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

(f) taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted: (1) taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or (2) requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State or local health, law enforcement, or other appropriate agency;

(g) making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f);

(h) providing the street address, city, county, state, and zip code for the site or sites where the performance of work in connection with the grant will take place. For some applicants who have functions carried out by employees in several departments or offices, more than one location may need to be specified. It is further recognized that States and other applicants who become grantees may add or change sites as a result of changes to program activities during the course of grant funded activities. Grantees, in such cases, are required to advise the HUD Field Office by submitting a revised Place of Performance form. The period covered by the certification extends until all funds under the specific grant have been expended.

I understand and agree to abide by this statement.

Name ______________________ Date 11-29-16
## 2017 HRC Budget

**Agency:** Institute for Community Alliances  

**Grant Period:** January 1, 2017 to December 31, 2017

The following expenses are eligible for reimbursement. Please indicate the amount being requested in the right hand column. **If including salary as a budget item, a list of names, positions, percentage of time spent on the grant and salaries will be required.**

<table>
<thead>
<tr>
<th>Category</th>
<th>Amount Requested</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel (salary and fringes): (use additional page below if necessary)</td>
<td></td>
</tr>
<tr>
<td>One (1) FTE System administrators – (70%), Salary (47,000)</td>
<td>32,900</td>
</tr>
<tr>
<td>Data Analyst (10%) – Salary(65,000)</td>
<td>6,500</td>
</tr>
<tr>
<td>ICA MO Director (7%) – Salary(85,500)</td>
<td>6,200</td>
</tr>
<tr>
<td><strong>Subtotal:</strong></td>
<td><strong>45,600</strong></td>
</tr>
</tbody>
</table>

**Operating Expenses:**

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount Requested</th>
</tr>
</thead>
<tbody>
<tr>
<td>Software/User Licensing- HMIS Software Fees</td>
<td>21,000</td>
</tr>
<tr>
<td><strong>Technical Assistance and Training</strong></td>
<td></td>
</tr>
<tr>
<td>related fees and HUD allowed travel expenses for TA and Training</td>
<td>3,750</td>
</tr>
<tr>
<td>Rent/Utilities/Insurance/and Office set up costs</td>
<td>3,750</td>
</tr>
<tr>
<td>Office supplies, postage, printing, phones, etc.</td>
<td>900</td>
</tr>
<tr>
<td><strong>Subtotal:</strong></td>
<td><strong>29,400</strong></td>
</tr>
</tbody>
</table>

**Contractual Expenses:**

<table>
<thead>
<tr>
<th>Subtotal</th>
<th></th>
</tr>
</thead>
</table>

**Direct Services to Clients:**

<table>
<thead>
<tr>
<th>Subtotal</th>
<th></th>
</tr>
</thead>
</table>

| Total Budget:                                                            | 75,000           |
2017 HRC Budget

Grant Period: January 1, 2017—December 31, 2017

MATCHING FUNDS

The match for Housing Resource Commission Grants is twenty-five percent. Match may be derived from public sources or private sources, and may include contributions of goods and services. Documentation regarding the required match must be included with your reimbursements and for review by the Department of Human Services staff. Please indicate match sources below.

<table>
<thead>
<tr>
<th>Category</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>State ESG for St. Louis County CoC (MHDC)</td>
<td>39,100</td>
</tr>
<tr>
<td>Total Match (25% of grant award):</td>
<td>39,100</td>
</tr>
<tr>
<td>Total of Operations + Essential Services</td>
<td>114,100</td>
</tr>
</tbody>
</table>
Front Door Assessment and Referral Process

A Coordinated Entry process has been implemented to improve the delivery of housing and shelter services for families and individuals who experience homelessness or great risk of homelessness throughout the St. Louis region. This process, the **Homeless System Front Door Assessment Process**, institutes consistent and uniform assessment processes to determine the most appropriate response to each individual or family’s immediate and long-term housing needs.

Homeless assistance providers will work to:
- Rapidly exit people from their homelessness to stable housing
- Ensure that the hardest to serve, with the greatest needs, are served
- Serve clients as efficiently and effectively as possible
- Ensure transparency and accountability throughout the referral and assessment process

**FRONT DOOR ASSESSMENT PARTNERS: ROLES AND EXPECTATIONS**

All households who enter any of the participating community shelters or who are homeless and on the street are assessed using the same Front Door Assessment tool. All providers funded by CoC or ESG are required to participate, others are invited and strongly encouraged to participate.

**Objective:** Front door assessment providers will work collaboratively with clearly defined roles and expectations that guide the day-to-day operations of the front door assessment and referral process.

**Front Door Assessment Providers**
- Complete Prevention and Diversion screening for those requesting front door services
- Complete initial Front Door VI-SPDAT assessments within 7 days of entering shelter, and begin full SPDAT assessment within 7 days of completing VI-SPDAT (full SPDAT is only completed by front door staff if no case management services are offered at shelter, otherwise shelter case management staff will complete full SPDAT).
- Make a referral in HMIS to program type appropriate for each client based on VI-SPDAT assessment and housing barriers screen.
- If client rejected by two referrals, initiate Case Conference Meeting (see Case Conference Meeting section).
- One representative from each Front Door Assessment provider participates in regular Assessment Process Management meetings to discuss referral operations and specific referral cases and make recommendations for system refinements.
- Participate in Case Conference Meetings as appropriate and as needed (only for clients the front door provides case management services for).

**Program Receiving Referrals**

**Emergency Shelters:**
- Send vacancy information to front door provider on a daily basis.
- Provider must accept 1 of every 4 referrals. Detailed documentation of reason for rejection is maintained in HMIS.
- Participate in Case Conference Meetings as appropriate, and as needed.
If case management services are provided at shelter, full SPDAT assessment is started within 7 days of VI-SPDAT being completed.

Housing Programs:
- Send vacancy information to waitlist provider on a weekly basis.
- Review Front Door referrals and conduct any additional screening processes (client interview, case review, etc.).
- Make determination to accept or reject referral within 7 days of receiving HMIS referral from Front Door Assessment provider. For PSH this may be a conditional acceptance pending final eligibility determination as required for LIHTC, Section 8 and Shelter+Care.
- Provider must accept 1 of every 4 referrals. Detailed documentation of reason for rejection is maintained in HMIS.
- Participate in Case Conference Meetings as appropriate, and as needed.
- Adhere to base-line eligibility requirements listed below.

Waitlist Provider and HMIS Staff
- Manage waiting list for participating transitional housing, rapid rehousing and permanent supportive housing programs.
- Receive program vacancy notifications and contact front door/shelter case manager to notify them of vacancies.
- Identify top priority clients for referral to vacancy. Maintain and revise order of waitlist according to VI-SPDAT scores, CoC priorities, and date of referral on a weekly basis.
- Participate in Assessment Process Management Meetings as appropriate.

**REFERRAL DECISION PROCESS**

Front Door Assessment providers will use established program referral criteria to determine the type of program appropriate for each client. The referral decision is based on a set assessment filters associated with each program type. All providers funded by CoC or ESG are required to participate, others are invited and strongly encouraged to participate.

**Program Referral Criteria- Single Adult**

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Program Referral Criteria (Assessment Filters)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rapid Rehousing</td>
<td>• VI-SPDAT Score of 4-7</td>
</tr>
<tr>
<td></td>
<td>• No income required</td>
</tr>
<tr>
<td>Transitional Housing</td>
<td>• VI-SPDAT Score of 4-7</td>
</tr>
<tr>
<td></td>
<td>• No income required</td>
</tr>
<tr>
<td></td>
<td>• Early recovery, pregnant, transitioning from DV or prison</td>
</tr>
<tr>
<td>Permanent Supportive Housing</td>
<td>• VI-SPDAT Score of 8+</td>
</tr>
<tr>
<td>Scattered Site</td>
<td>• Documented disability that impeded ability to live independently</td>
</tr>
<tr>
<td>Program Type</td>
<td>Program Referral Criteria (Assessment Filters)</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Permanent Supportive Housing</td>
<td>• VI-SPDAT Score of 8+</td>
</tr>
<tr>
<td>Facility Based</td>
<td>• Documented disability that impeded ability to live independently</td>
</tr>
<tr>
<td></td>
<td>• Previously referred to scattered Site PSH</td>
</tr>
<tr>
<td></td>
<td>• High user of hospitals/ER and/or higher score in medical section of VI-SPDAT</td>
</tr>
</tbody>
</table>

## Program Referral Criteria - Family (Two+ people in one household)

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Program Referral Criteria (Assessment Filters)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rapid Rehousing</td>
<td>• VI-SPDAT Score of 4-8</td>
</tr>
<tr>
<td></td>
<td>• No income required</td>
</tr>
<tr>
<td>Transitional Housing</td>
<td>• VI-SPDAT Score of 4-8</td>
</tr>
<tr>
<td></td>
<td>• No income required</td>
</tr>
<tr>
<td></td>
<td>• Early recovery, pregnant, transitioning from DV, young adults (18-24) with children</td>
</tr>
<tr>
<td>Permanent Supportive Housing</td>
<td>• VI-SPDAT Score of 9+</td>
</tr>
<tr>
<td>Scattered Site</td>
<td>• Documented disability that impeded ability to live independently</td>
</tr>
<tr>
<td></td>
<td>• 1 adult with 1 or more children</td>
</tr>
<tr>
<td>Permanent Supportive Housing</td>
<td>• VI-SPDAT Score of 9+</td>
</tr>
<tr>
<td>Facility Based</td>
<td>• Documented disability that impeded ability to live independently</td>
</tr>
<tr>
<td></td>
<td>• Previously referred to scattered Site PSH</td>
</tr>
<tr>
<td></td>
<td>• High user of hospitals/ER and/or higher score in medical section of VI-SPDAT</td>
</tr>
</tbody>
</table>

## Program Referral Criteria - Youth

<table>
<thead>
<tr>
<th>Program Type</th>
<th>Program Referral Criteria (Assessment Filters)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Independent Living Program/Rapid</td>
<td>• VI-SPDAT Score of 4-7</td>
</tr>
<tr>
<td>Rehousing</td>
<td>• Ages 16-24</td>
</tr>
<tr>
<td></td>
<td>• No income required</td>
</tr>
<tr>
<td>Program Type</td>
<td>Program Referral Criteria (Assessment Filters)</td>
</tr>
<tr>
<td>------------------------------</td>
<td>---------------------------------------------------------------------</td>
</tr>
<tr>
<td>Transitional Living Program</td>
<td>• VI-SPDAT Score of 8+</td>
</tr>
<tr>
<td></td>
<td>• Ages 16-24</td>
</tr>
<tr>
<td></td>
<td>• No income required</td>
</tr>
<tr>
<td></td>
<td>• Early recovery, pregnant, transitioning from DV, young adults with children</td>
</tr>
</tbody>
</table>

**MAKING REFERRALS**

- Complete *Client Intake, Assessment, and Housing Barriers Screen* and enter all information into HMIS.
- Review the *Program Criteria* for each program type and align the client’s barriers and characteristics with the program type designed to address those specific barriers and circumstances. Front Door Assessment providers will identify a single program type to which the client will be referred.
- Make a program referral in HMIS to waitlist provider.
- Once a program opening is identified for a client on the waitlist, waitlist provider staff will notify the Front Door referral provider for that client and the agency with the vacancy that will receive the referral.
- If the referral is rejected by the ‘referred to’ provider, the provider will notify the agency working with the client, and waitlist provider staff that the client has been rejected and that the next scoring client needs to be referred.

**RECEIVING REFERRALS**

- All participating emergency shelters, transitional housing, rapid rehousing and permanent supportive housing programs must fill all vacancies through the Front Door. Requests for referrals should be made if:
  - For programs with multiple partners, both agencies agree to request referral.
  - The unit is vacant and ready for move in.
  - The unit has passed inspection, if required and occupancy permit is obtained, if required.
- When a notification about a referral is received, log on to HMIS and review the client in using the client name and ID number, look up the clients *Intake, Assessment* and *Housing Barriers Screen* information. Conduct any additional screening processes (client interview, case review, etc.)
- RRH, TH and PSH projects will make determination to accept or reject referral within 7 days of receiving referral from Front Door provider. For PSH this may be a conditional acceptance pending final eligibility determination as required for LIHTC, Section 8 and Shelter+Care. Providers may schedule client interviews to collect additional data and assess for program fit. Interview must be conducted within 7 days of receipt of referral.
- If receiving agency accepts the referral, the provider contacts the Front Door provider that has contact with the client to establish move in date and arrange logistics.

**REFERRAL PRIORITIZATION**
Objective: Front Door Assessment providers will refer those experiencing homelessness for limited beds and resources based on CoC priority populations and criteria that prioritize individuals that have historically been the hardest to serve and those individuals and families that have been waiting the longest for housing.

Clients will be referred to available housing and service slots for Permanent Supportive Housing based on the following set of ranked prioritization criteria:

- Clients who meet the definition of chronic homeless and those that are at risk of becoming chronically homeless (as documented by providers that the person has a disabling condition and 4 episodes of homelessness in a three year period or 1 year of continuous homelessness)
- Clients who are veterans (as documented by DD214)
- Families with children (as documented by birth certificate(s)).
- Youth aged 16-24
- Medically frail

REFERRAL MANAGEMENT PROCESS

Objective: Front Door Assessment providers will assess client, needs, and housing barriers, and refer clients to the most appropriate housing option available.

Vacancy Notification
All participating agencies with transitional housing, rapid rehousing and permanent supportive housing programs will send information about vacancies when unit is move in ready and/or voucher is available to waitlist provider.

Centralized Waiting List
A centralized waiting list by program type for transitional housing, rapid rehousing and permanent supportive housing will be maintained by waitlist provider.

Referral Procedures
If there are no programs with vacancies, client is put on the waiting list for the most appropriate program type. (Reporting will track both the program type client scored for as well as program type that client was referred to, to identify gaps in the system.) If the client is in a priority category, client will access the next available vacancy or be placed at the top of the centralized waiting list based on the Referral Prioritization Criteria.

SECONDARY ASSESSMENTS

Re-Assessment at Emergency Shelter
If an individual or family is still an emergency shelter and more information is obtained which would change barriers to housing placement, an updated assessment can be completed by the assessor to determine if a level of care change needs to occur.

If an individual or family is still residing in shelter for more than 6 months, an updated full SPDAT assessment will be completed to determine if a level of care change needs to occur.
Mid-System Re-Assessment
If a client is placed in a program and it is determined that the household has barriers that were not identified in the original assessment which are supported by new documentation, the agency currently serving the client will update full SPDAT and Housing Barriers Screen. If the client scores for another program type, the Program will call the waitlist provider to make the referral. The client will not have to return to an emergency shelter to complete the mid-system assessment.

Moving On Assessment
For tenants ready to move on from PSH to another subsidy program or housing in the open market (not another PSH), the Housing Barriers Screen will be updated and a new referral made in HMIS if necessary.

Lateral Move
If a client housed at a facility based PSH program is determined to need less supportive services and/or would benefit from scattered site placement, a lateral move can be made, as long as the client meets the receiving program requirements. If a client is housed in a PSH scattered site program and is not succeeding (with evidence that attempts have been made to assist the client in maintaining current housing), and it is determined that the client would benefit from facility based housing in order to not return to homelessness, a lateral move can be made as long as the client meets the receiving program requirements. All lateral moves must be case conferenced with supportive services staff, landlords (if applicable), and waitlist provider staff to determine if a lateral move is appropriate and will prevent the client from returning to homelessness.

FRONT DOOR ASSESSMENT MONITORING

Objective: To support transparent operations of the referral process, the waitlist provider staff will review HMIS data, monitor the effectiveness of the referral process, and engage in case conferencing to problem solve individual referral and linkage problems as necessary.

Assessment Process Management Meetings
Assessment Process Management meetings are designed to allow transparent and systematic review of Front Door Assessment functioning. All system providers are welcome to attend. Participation is required for at least one representative from each Front Door Assessment provider and waitlist provider staff and/or HMIS staff as needed.

A typical Assessment Process Management Meeting agenda will include the following:

- Status of the Centralized Waiting List
- Review of referral process functioning
- Review of appropriate HMIS report(s) (clients served, length of stay, outcomes, etc.)
- Review VI-SPDAT refusal rates

Case Conference Meetings
Case conferences will be provided as needed. Waitlist provider staff will initially participate in these meetings via telephone and in person as schedule allows. Case conferences will review the following cases:

- Two providers reject the same client
• Provider rejects four referrals in a row

• Involuntary termination

• A client is placed in a program and it is determined that the client needs to go to another program option

• A Client VI-SPDAT refusal takes place and it has been determined client is not competent to complete the assessment

Case Conferences will assess the housing planning (placement options) for clients with most difficult/challenging barriers and the accuracy of the assessment process in making an appropriate referral. Case Conferences will include:

• Referring agency
• Receiving agency
• Waitlist provider staff
• Front Door staff (not necessary for lateral moves)

Front Door Assessment Monitoring Meetings
The Planning Committee will serve as the general oversight body for the Front Door Assessment and Referral process. The Committee will meet to review appropriate HMIS reports, discuss any assessment and referral updates to barriers, and identify major programmatic and policy questions, changes or potential impacts. A front door monitoring subcommittee will be designated to work closely with the HMIS subcommittee and formulate and report on key data measures for monitoring.

(If a client is to be involuntarily terminated from a program, the agency must notify the waitlist provider staff. Case conferences will be held to discuss appropriate placement and follow up. In cases where the client poses an immediate threat to self or others, the provider will seek emergency removal as needed to ensure safety. In cases where the client will not be returned to the program, the waitlist provider and Front Door Assessor will be notified of the removal within 24 hours and the case will be referred for case conferencing. Program exiting the client from services can refer the client back to the front door for housing/shelter planning/referral.)

[Signature]

11-29-16

Sign and Date
Measure 1: Length of Time Persons Remain Homeless

This measures the number of clients active in the report date range across ES, SH (Metric 1.1) and then ES, SH and TH (Metric 1.2) along with their average and median length of time homeless. This includes time homeless during the report date range as well as prior to the report start date, going back no further than October, 1, 2012.

*Metric 1.1: Change in the average and median length of time persons are homeless in ES and SH projects.*

*Metric 1.2: Change in the average and median length of time persons are homeless in ES, SH, and TH projects.*

a. This measure is of the client’s entry, exit, and bed night dates strictly as entered in the HMIS system.
FY2016 - Performance Measurement Module (Sys PM)

<table>
<thead>
<tr>
<th>Universe (Persons)</th>
<th>Average LOT Homeless (bed nights)</th>
<th>Median LOT Homeless (bed nights)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Persons in ES and SH</td>
<td>759</td>
<td>773</td>
</tr>
<tr>
<td>1.2 Persons in ES, SH, and TH</td>
<td>862</td>
<td>876</td>
</tr>
</tbody>
</table>

b.

This measure includes data from each client’s “Length of Time on Street, in an Emergency Shelter, or Safe Haven” (Data Standards element 3.17) response and prepends this answer to the client’s entry date effectively extending the client’s entry date backward in time. This “adjusted entry date” is then used in the calculations just as if it were the client’s actual entry date.

NOTE: Due to the data collection period for this year’s submission, the calculations for this metric are based on the data element 3.17 that was active in HMIS from 10/1/2015 to 9/30/2016. This measure and the calculation in the SPM specifications will be updated to reflect data element 3.917 in time for next year’s submission.
### Measure 2: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.

<table>
<thead>
<tr>
<th>Exit was from SO</th>
<th>Total # of Persons who Exited to a Permanent Housing Destination (2 Years Prior)</th>
<th>Returns to Homelessness in Less than 6 Months</th>
<th>Returns to Homelessness from 6 to 12 Months</th>
<th>Returns to Homelessness from 13 to 24 Months</th>
<th>Number of Returns in 2 Years</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Revised FY2015</td>
<td># of Returns</td>
<td>Revised FY2015</td>
<td># of Returns</td>
<td>% of Returns</td>
</tr>
<tr>
<td>Exit was from SO</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Exit was from ES</td>
<td>279</td>
<td>278</td>
<td>23</td>
<td>9</td>
<td>3%</td>
</tr>
<tr>
<td>Exit was from TH</td>
<td>19</td>
<td>30</td>
<td>0</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Exit was from SH</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Exit was from PH</td>
<td>26</td>
<td>18</td>
<td>1</td>
<td>1</td>
<td>6%</td>
</tr>
<tr>
<td>TOTAL Returns to Homelessness</td>
<td>324</td>
<td>326</td>
<td>24</td>
<td>10</td>
<td>3%</td>
</tr>
</tbody>
</table>

### Measure 3: Number of Homeless Persons

**Metric 3.1 – Change in PIT Counts**
## FY2016 - Performance Measurement Module (Sys PM)

This measures the change in PIT counts of sheltered and unsheltered homeless persons as reported on the PIT (not from HMIS).

<table>
<thead>
<tr>
<th></th>
<th>2015 PIT Count</th>
<th>Most Recent PIT Count</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Total PIT Count of sheltered and unsheltered persons</td>
<td>438</td>
<td>465</td>
<td>27</td>
</tr>
<tr>
<td>Emergency Shelter Total</td>
<td>203</td>
<td>269</td>
<td>66</td>
</tr>
<tr>
<td>Safe Haven Total</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Transitional Housing Total</td>
<td>176</td>
<td>148</td>
<td>-28</td>
</tr>
<tr>
<td>Total Sheltered Count</td>
<td>379</td>
<td>417</td>
<td>38</td>
</tr>
<tr>
<td>Unsheltered Count</td>
<td>59</td>
<td>48</td>
<td>-11</td>
</tr>
</tbody>
</table>

### Metric 3.2 – Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY2015</th>
<th>Revised FY2015</th>
<th>Current FY</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Unduplicated Total sheltered homeless persons</td>
<td>893</td>
<td>884</td>
<td>1018</td>
<td>134</td>
</tr>
<tr>
<td>Emergency Shelter Total</td>
<td>789</td>
<td>781</td>
<td>877</td>
<td>96</td>
</tr>
<tr>
<td>Safe Haven Total</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Transitional Housing Total</td>
<td>117</td>
<td>118</td>
<td>153</td>
<td>35</td>
</tr>
</tbody>
</table>
**FY2016 - Performance Measurement Module (Sys PM)**

**Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects**

**Metric 4.1 – Change in earned income for adult system stayers during the reporting period**

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY2015</th>
<th>Revised FY2015</th>
<th>Current FY</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults (system stayers)</td>
<td>176</td>
<td>184</td>
<td>137</td>
<td>-47</td>
</tr>
<tr>
<td>Number of adults with increased earned income</td>
<td>30</td>
<td>7</td>
<td>6</td>
<td>-1</td>
</tr>
<tr>
<td>Percentage of adults who increased earned income</td>
<td>17%</td>
<td>4%</td>
<td>4%</td>
<td>0%</td>
</tr>
</tbody>
</table>

**Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period**

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY2015</th>
<th>Revised FY2015</th>
<th>Current FY</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults (system stayers)</td>
<td>176</td>
<td>184</td>
<td>137</td>
<td>-47</td>
</tr>
<tr>
<td>Number of adults with increased non-employment cash income</td>
<td>75</td>
<td>29</td>
<td>15</td>
<td>-14</td>
</tr>
<tr>
<td>Percentage of adults who increased non-employment cash income</td>
<td>43%</td>
<td>16%</td>
<td>11%</td>
<td>-5%</td>
</tr>
</tbody>
</table>

**Metric 4.3 – Change in total income for adult system stayers during the reporting period**

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY2015</th>
<th>Revised FY2015</th>
<th>Current FY</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults (system stayers)</td>
<td>176</td>
<td>184</td>
<td>137</td>
<td>-47</td>
</tr>
<tr>
<td>Number of adults with increased total income</td>
<td>99</td>
<td>35</td>
<td>21</td>
<td>-14</td>
</tr>
<tr>
<td>Percentage of adults who increased total income</td>
<td>56%</td>
<td>19%</td>
<td>15%</td>
<td>-4%</td>
</tr>
</tbody>
</table>
## FY2016 - Performance Measurement Module (Sys PM)

### Metric 4.4 – Change in earned income for adult system leavers

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY2015</th>
<th>Revised FY2015</th>
<th>Current FY</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults who exited (system leavers)</td>
<td>29</td>
<td>37</td>
<td>47</td>
<td>10</td>
</tr>
<tr>
<td>Number of adults who exited with increased earned income</td>
<td>9</td>
<td>12</td>
<td>11</td>
<td>-1</td>
</tr>
<tr>
<td>Percentage of adults who increased earned income</td>
<td>31%</td>
<td>32%</td>
<td>23%</td>
<td>-9%</td>
</tr>
</tbody>
</table>

### Metric 4.5 – Change in non-employment cash income for adult system leavers

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY2015</th>
<th>Revised FY2015</th>
<th>Current FY</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults who exited (system leavers)</td>
<td>29</td>
<td>37</td>
<td>47</td>
<td>10</td>
</tr>
<tr>
<td>Number of adults who exited with increased non-employment cash income</td>
<td>9</td>
<td>11</td>
<td>12</td>
<td>1</td>
</tr>
<tr>
<td>Percentage of adults who increased non-employment cash income</td>
<td>31%</td>
<td>30%</td>
<td>26%</td>
<td>-4%</td>
</tr>
</tbody>
</table>

### Metric 4.6 – Change in total income for adult system leavers

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY2015</th>
<th>Revised FY2015</th>
<th>Current FY</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Number of adults who exited (system leavers)</td>
<td>29</td>
<td>37</td>
<td>47</td>
<td>10</td>
</tr>
<tr>
<td>Number of adults who exited with increased total income</td>
<td>16</td>
<td>20</td>
<td>21</td>
<td>1</td>
</tr>
<tr>
<td>Percentage of adults who increased total income</td>
<td>55%</td>
<td>54%</td>
<td>45%</td>
<td>-9%</td>
</tr>
</tbody>
</table>
**FY2016 - Performance Measurement Module (Sys PM)**

**Measure 5: Number of persons who become homeless for the 1st time**

Metric 5.1 – Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2015</th>
<th>Revised FY2015</th>
<th>Current FY</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Person with entries into ES, SH or TH during the reporting period.</td>
<td>744</td>
<td>743</td>
<td>839</td>
<td>96</td>
</tr>
<tr>
<td>Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.</td>
<td>42</td>
<td>43</td>
<td>57</td>
<td>14</td>
</tr>
<tr>
<td>Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)</td>
<td>702</td>
<td>700</td>
<td>782</td>
<td>82</td>
</tr>
</tbody>
</table>

Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2015</th>
<th>Revised FY2015</th>
<th>Current FY</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Person with entries into ES, SH, TH or PH during the reporting period.</td>
<td>855</td>
<td>844</td>
<td>998</td>
<td>154</td>
</tr>
<tr>
<td>Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.</td>
<td>68</td>
<td>70</td>
<td>103</td>
<td>33</td>
</tr>
<tr>
<td>Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)</td>
<td>787</td>
<td>774</td>
<td>895</td>
<td>121</td>
</tr>
</tbody>
</table>
**FY2016 - Performance Measurement Module (Sys PM)**

**Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD’s Homeless Definition in CoC Program-funded Projects**

This Measure is not applicable to CoCs in the FY2016 Resubmission reporting period.

**Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing**

Metric 7a.1 – Change in exits to permanent housing destinations

<table>
<thead>
<tr>
<th></th>
<th>Submitted FY 2015</th>
<th>Revised FY2015</th>
<th>Current FY</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Universe: Persons who exit Street Outreach</td>
<td>1</td>
<td>6</td>
<td>554</td>
<td>548</td>
</tr>
<tr>
<td>Of persons above, those who exited to temporary &amp; some institutional destinations</td>
<td>0</td>
<td>0</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Of the persons above, those who exited to permanent housing destinations</td>
<td>0</td>
<td>0</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>% Successful exits</td>
<td>0%</td>
<td>0%</td>
<td>1%</td>
<td>1%</td>
</tr>
</tbody>
</table>

Metric 7b.1 – Change in exits to permanent housing destinations
### FY2016 - Performance Measurement Module (Sys PM)

<table>
<thead>
<tr>
<th>Metric 7b.2 – Change in exit to or retention of permanent housing</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Universe: Persons in ES, SH, TH and PH-RRH who exited</strong></td>
</tr>
<tr>
<td>Submitted FY 2015</td>
</tr>
<tr>
<td>714</td>
</tr>
<tr>
<td><strong>Of the persons above, those who exited to permanent housing destinations</strong></td>
</tr>
<tr>
<td>Submitted FY 2015</td>
</tr>
<tr>
<td>304</td>
</tr>
<tr>
<td>% Successful exits</td>
</tr>
<tr>
<td>43%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Universe: Persons in all PH projects except PH-RRH</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations</strong></td>
</tr>
<tr>
<td>Submitted FY 2015</td>
</tr>
<tr>
<td>361</td>
</tr>
<tr>
<td>% Successful exits/retention</td>
</tr>
<tr>
<td>99%</td>
</tr>
</tbody>
</table>
This is a new tab for FY 2016 submissions only. Submission must be performed manually (data cannot be uploaded). Data coverage and quality will allow HUD to better interpret your Sys PM submissions.

Your bed coverage data has been imported from the HIC module. The remainder of the data quality points should be pulled from data quality reports made available by your vendor according to the specifications provided in the HMIS Standard Reporting Terminology Glossary. You may need to run multiple reports into order to get data for each combination of year and project type.

You may enter a note about any field if you wish to provide an explanation about your data quality results. This is not required.
# FY2016 - SysPM Data Quality

<table>
<thead>
<tr>
<th></th>
<th>All ES, SH</th>
<th>All TH</th>
<th>All PSH, OPH</th>
<th>All RRH</th>
<th>All Street Outreach</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Number of non-DV Beds on HIC</td>
<td>150</td>
<td>172</td>
<td>172</td>
<td>120</td>
<td>409</td>
</tr>
<tr>
<td>2. Number of HMIS Beds</td>
<td>150</td>
<td>137</td>
<td>137</td>
<td>120</td>
<td>174</td>
</tr>
<tr>
<td>3. HMIS Participation Rate from HIC ( % )</td>
<td>100.00</td>
<td>79.65</td>
<td>79.65</td>
<td>100.00</td>
<td>68.24</td>
</tr>
<tr>
<td>4. Unduplicated Persons Served (HMIS)</td>
<td>619</td>
<td>687</td>
<td>781</td>
<td>877</td>
<td>367</td>
</tr>
<tr>
<td>5. Total Leavers (HMIS)</td>
<td>544</td>
<td>586</td>
<td>660</td>
<td>769</td>
<td>316</td>
</tr>
<tr>
<td>6. Destination of Don't Know, Refused, or Missing (HMIS)</td>
<td>104</td>
<td>112</td>
<td>65</td>
<td>67</td>
<td>96</td>
</tr>
<tr>
<td>7. Destination Error Rate (%)</td>
<td>19.12</td>
<td>19.11</td>
<td>9.85</td>
<td>8.71</td>
<td>30.38</td>
</tr>
</tbody>
</table>
### 2017 HDX Competition Report

#### FY2016 - SysPM Data Quality

<table>
<thead>
<tr>
<th></th>
<th>All ES, SH</th>
<th>All TH</th>
<th>All PSH, OPH</th>
<th>All RRH</th>
<th>All Street Outreach</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Number of non-DV Beds on HIC</td>
<td>150</td>
<td>172</td>
<td>172</td>
<td>120</td>
<td>255</td>
</tr>
<tr>
<td>2. Number of HMIS Beds</td>
<td>150</td>
<td>137</td>
<td>137</td>
<td>120</td>
<td>174</td>
</tr>
<tr>
<td>3. HMIS Participation Rate from HIC (%)</td>
<td>100.00</td>
<td>79.65</td>
<td>79.65</td>
<td>100.00</td>
<td>40.24</td>
</tr>
<tr>
<td>4. Unduplicated Persons Served (HMIS)</td>
<td>619</td>
<td>687</td>
<td>781</td>
<td>877</td>
<td>367</td>
</tr>
<tr>
<td>5. Total Leavers (HMIS)</td>
<td>544</td>
<td>586</td>
<td>660</td>
<td>769</td>
<td>316</td>
</tr>
<tr>
<td>6. Destination of Don’t Know, Refused, or Missing (HMIS)</td>
<td>104</td>
<td>112</td>
<td>65</td>
<td>67</td>
<td>96</td>
</tr>
<tr>
<td>7. Destination Error Rate (%)</td>
<td>19.42</td>
<td>19.11</td>
<td>9.65</td>
<td>8.71</td>
<td>30.30</td>
</tr>
</tbody>
</table>