**Rensselaer County Continuum of Care Governance Charter**

**Amendments Approved October 20, 2015**

**Effective October 15, 2013**

**Mission**

The mission of the Rensselaer County Continuum of Care (RCCoC) is to work to ensure a seamless continuum of housing and supportive services aimed at the elimination of homelessness in Rensselaer County.

**II Purpose and Responsibilities**

In order to fulfill its mission, the RCCoC takes on the following responsibilities for Rensselaer, New York:

1. Hold meetings of the full membership in accordance with HUD regulations;
2. Invite new members to join in accordance with HUD regulations;
3. Adopt and follow a written process to select a board to act on behalf of RCCoC in accordance with HUD regulations;
4. Appoint additional committees, subcommittees, or workgroups;
5. Develop, follow, and update annually this governance charter in accordance with HUD regulations;
6. Consult with recipients and subrecipients of HUD funds through RCCoC to establish

performance targets, monitor performance, evaluate outcomes, and take action against poor performers as per HUD regulations;

1. Evaluate outcomes of projects funded under the Emergency Solutions Grants program

and the Continuum of Care program, and report to HUD;

1. Establish and operate either a centralized or coordinated assessment system that provides an initial comprehensive assessment of the needs of individuals and families for housing and service, which would be updated as necessary;
2. Establish and consistently follow written standards for providing Continuum of Care assistance in accordance with HUD regulations;
3. Designate and operate an HMIS in accordance with HUD regulations;
4. Develop a Continuum of Care plan in accordance with HUD regulations;
5. Prepare an application in response to HUD Continuum of Care Notice of Funding Availability (NOFA); using the process that complies with HUD regulations.
6. Facilitate dialogue and strategic action among public, private and non- profit sectors to prevent and end homelessness and promote affordable housing.

#### Ill Membership

* 1. **Open Membership**
		1. Membership in RCCoC will be open to individuals and organizations committed to ending homelessness in Rensselaer County.
		2. At least annually, the RCCoC will issue a public invitation for new members.
		3. The RCCoC will endeavor to include members of all relevant organizations in the covered counties, including but not limited to nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, housing advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve veterans, and homeless or formerly homeless individuals.
		4. Organizations can have more than one member. In such instances, the organization will pay only one dues fee and will have one vote.

#### Membership Meetings

* + 1. The RCCoC will hold meetings of the full membership, with published agendas, at least semi-annually, in October and May. A meeting agenda will be prepared and distributed prior to each meeting, along with a draft of the minutes from the prior meeting. Any changes to meeting dates or times will be announced in advance and members will be notified by e-mail.
		2. The October membership meeting will be the Annual Meeting. Members will be notified at least two weeks in advance of the Annual meeting.
		3. RCCoC budget will be presented to and approved by membership at the Annual meeting. Budget modifications which are not significant may be approved by the Board in between the membership meetings.
		4. Special meetings may be called by request in writing by five members of the Continuum or a majority of the officers. As much advance notice of special meetings as possible will be provided.
		5. RCCoC has a Code of Conduct. Members who violate this code may lose their

membership.

#### Voting

* + 1. A quorum is defined as those members present at the meeting.
		2. Each member will have one vote, with the, exception of organizations with multiple members, as described above in A 4.
		3. In the case when the organization has more than one applicant, if the applicant is acting

in a representative capacity, she must state the name of the organization she is

representing and submit authorization from that organization of her representative capacity.

* + 1. A motion will be passed by a majority of the *vote.* Where a matter of procedure is in

question, RCCoC shall defer to *Robert's Rules of Order.*

* 1. **Dues**
		1. An individual or organization becomes a member of the RCCoC by paying annual dues.

Organizations with multiple members will only need to pay one dues fee.

* + 1. The Board will make recommendations to the membership regarding the dues amount and how dues will be used, and the membership will vote on the recommendations. Dues will be established based on the RCCoC's anticipated expenses as provided in the annual budget.
		2. The RCCoC will make accommodations for those individuals or organizations unable to pay the full dues.
		3. The Board will identify an organization or a bank to hold the dues.

**IV RCCoC Board**

1. **Establishment of the Board**
	1. The RCCoC has adopted the process described below for selection of a Board to act on behalf of the Continuum.

2. The process will be reviewed, updated, and approved by RCCoC at least once *every* five

years.

1. **Board Composition**
2. The RCCoC Board will be comprised of between 5 and 11members.
3. The Board will include Officers (see next section}.
4. The Board will include a currently or formerly homeless person.
5. The homeless/formerly homeless person and the Officers will make recommendations for the remaining Board seats, endeavoring to ensure that all relevant community partners and all geographical areas *covered* by the RCCoC are represented equitably.
6. The RCCoC membership will vote on all proposed Officers and Board members.
7. Mid-term Board vacancies will be filled by individuals recommended by one or more remaining Board members and approved by majority vote of the Board for the unexpired portion of term.
8. **Officers**
9. Board officer positions will include Chair, Vice-Chair, Secretary and Treasurer.
10. Officer Responsibilities will be:
	1. Chair: The Chair will call, set agendas for, and preside over all Board meetings.
	2. Vice-Chair: The Vice-Chai r will assume all of the Chair's duties in his/her absence.
	3. Secretary: The Secretary will be responsible for providing notice of any meeting, and taking and distributing minutes. The Secretary will track Board and general membership attendance.
	4. Treasurer: The Treasurer will be responsible for establishing an annual budget,

recommending annual dues amount, and collecting dues.

1. Officers will serve two-year, staggered terms, with the exception of the first term. Officers will serve two-year terms. There are no term limits on Officer positions.
2. **Terms**
	1. Board members will serve two-year, staggered terms.
	2. There will be no term limits for Board members.

4. The homeless representative may choose to serve a one year term at their convenience.

1. **Purpose and Powers of Executive Board**
	1. The Executive Board shall implement the RCHSC mission and purpose, including setting objectives and plans for the achievement of the RCHSC purpose and mission, implementing HUD C of C requirements, selecting applicants, the collaborative applicant or unified funding agency and HMIS lead, designing and implementing a collaborative process for the development, submission and approval of the annual application for HUD funding and ensuring that planning, systems development and implementation and program performance reviews occur in a collaborative and constructive manner.
2. The Executive Board shall determine annual dues and fees as may be required to accomplish the mission and purpose of the RCHSC.
3. The Executive Board shall report to the membership at the quarterly membership meetings.
4. The Executive Board may appoint ad hoc committees composed of members and

nonmembers of the RCHSC and may also establish other standing committees upon a 2/3 vote of the Executive Board. (with ratification by membership ?)

1. The Executive Board shall appoint its own members to participate in standing committees.
2. Roles and Responsibilities of the Board
	1. The Board will be responsible for identifying a Collaborative Applicant, which must be approved by the membership.
3. The Board will assist the RCCoC in coordinating efforts amongst RCCoC members to fulfill all CoC responsibilities.
4. Board members can be terminated by the Board for violating the Code of Conduct

and/or excessive absenteeism. In considering absenteeism, participation in Board meetings, full membership meetings, and Committee meetings will be reviewed. After such a review, the Board may make a recommendation for removal of that member from the Board. If such a recommendation is made, the Secretary will notify Board members of the need for a Special Meeting.

1. Meetings
2. The RCCoC Board will meet at least quarterly. A meeting agenda will be prepared and distributed prior to each meeting, along with a draft of the minutes from the prior meeting. Any changes to meeting dates or times will be announced in advance and members will be notified by e-mail.
3. A quorum is defined as a majority of members of Board present.
4. A majority vote is required for passage of any measure. Members may not vote by proxy and are not eligible to vote unless physically present.

V Committees

1. **Outreach Committee** is responsible for expanding the RCHSC’s community engagement and outreach to include, but not be limited to, community service agencies as well as the homeless population through street outreach, and coordinating an annual homeless Point-In-Time Count (only ES, TH, PH, shelters); conducting homeless awareness activities; participating in local planning, and any other activities identified and voted on by the membership.
2. **Goals & Data Committee** is responsible for the review and discussion of HMIS data quality issues, while working with the HMIS System Administrator to ensure proper and effective HMIS policies and procedures; the review of program performance; the review the previous year's Continuum of Care application (NOFA), annual Housing Inventory, and the Continuum of Care's performance relative to its goals. Two representatives from this Committee will take part in the quarterly HMIS Advisory Committee meetings.
3. **Strategic Planning Committee** is responsible for the review, preparation, and formulation of the Rensselaer County plan to end homelessness with respect to system planning, review of data, needs, and gaps in the overall implementation and coordination of the housing and service system.
4. **Rensselaer County Veterans Challenge to End Homelessness Committee** is responsible for utilizing comprehensive outreach and engagement strategies to identify Veterans experiencing homelessness. The Committee also works hand in hand with Coordinated Entry to ensure that Veterans are prioritized and housed appropriately.
5. **Coordinated Entry Committee** is responsible for creating the coordinated entry process in Rensselaer County. It reviews all stages of the assessment, referral, application, vacancy posting and acceptance/denial processes.
6. **NOFA/Applications Committee** is responsible for the design, operation and collaborative process for the development of relevant government funding applications, including funding priorities and the number and type of applicants through the Rank and Review Process.
7. **Code of Conduct**
	1. RCCoC Board members must represent the interests of all people served by RCCoC programs and not favor special interests inside or outside the purview of the Board.
	2. RCCoC Board members will not use the Board or their service on the Board for their own personal interest. "Interest" is defined as a situation in which a Board member or a member of his/her family has an interest in, financial or otherwise, whether as owner, fiduciary, employee, or consultant, or supplier of goods or services, any agency under the purview of the Board.
	3. RCCoC Board members will keep confidential information confidential.
	4. RCCoC Board members will respect and support the decisions of the Board.
	5. RCCoC Board members will approach all Board issues with an open mind, prepared to make the best decisions for everyone involved.
	6. RCCoC Board members will do nothing to violate the trust of those who appointed them to the Board, or of those whom they serve.
	7. RCCoC Board members will never exercise authority as a Board member except when acting in a meeting with the full Board, or as delegated by the Board.
	8. RCCoC Board members will complete annually a Statement of Disclosure, identifying any interests in any agencies under the purview of the Board (see Appendix 1).
	9. When an RCCoC Board member or his/her family has an interest in an agency on which the Board must take a vote, that member shall abstain from participating in the discussion of the matter and from voting on the matter.
8. **RCCoC HMIS**

The RCCoC will:

1. Designate a single Homeless Management Information System (HMIS) for the geographic area;

1. Designate an eligible applicant to manage the RCCoC HMIS, which will be known as the HMIS Lead;
2. Review, revise, and approve a privacy plan, security plan, and data quality plan for the

HMIS.

1. Ensure consistent participation of recipients and subrecipients in the HMIS; and
2. Ensure the HMIS is administered in compliance with requirements prescribed by HUD.
3. Develop an HMIS Charter (see Appendix 2).
4. **Planning, Written Standards, Policies and Procedures, Coordinated Entry**
5. **Planning**

Overseen by the Board, the RCCoC will annually review the process for the following:

* + 1. Coordinating the implementation of the housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. Specifically focusing on outreach, engagement, assessment,

shelter, housing, supportive services, and

prevention strategies.

* 1. Planning for and conducting an annual point-in-time count of homeless persons within the geographic area that meets the following requirements:
		1. Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons.
1. Persons living in emergency shelters and transitional housing projects must be

counted as sheltered homeless persons.

1. Other requirements established by HUD by Notice.
	1. Conducting an annual gaps analysis of the homeless needs and services available within the RCCoC geographic area;
	2. Providing information required to complete the Consolidated Plan covered by the

RCCoC geographic area;

* 1. Consulting with State and local government Emergency Solutions Grants (ESG) program recipients within the RCCoC's geographic area on the plan for allocating ESG program funds and reporting on and evaluating the performance of ESG program recipients and subrecipients.
1. **Written Standards & Policies and Procedures**

The RCCoC will annually review both the *Written Standards* and the *Policies and Procedures* for funded programs in compliance with HUD regulations. The RCCoC Board will be responsible for ensuring the *Written Standards* as well as the *Polices and Procedures* include the following:

* 1. Policies and procedures for evaluating individuals' and families' eligibility for assistance under this part;
	2. Policies and procedures for determining and prioritizing which eligible individuals and

families will receive transitional housing assistance;

* 1. Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;
	2. Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and
	3. There will be an annual review of the Policies and procedures to guide the operation of the coordinated entry system to comply with any requirements established by HUD by Notice.
	4. Standards that determine what percentage or amount of rent each program participant

must pay while receiving rapid rehousing assistance;

* 1. Standards will be reviewed in consultation with Emergency Solutions Grants program funds within the geographic area.
	2. If the RCCoC is designated a high-performing community, written standards as well as policies and procedures will be developed in accordance with HUD regulations.
1. Applying for **HUD** Funds The RCCoC will:
2. Design, operate, and follow a collaborative process for the development of applications and approve the submission of applications in response to NOFAs published by HUD.
3. Establish priorities for funding projects;
4. Determine if one application for funding will be submitted for all RCCoC projects or if more than one application will be submitted;
	1. If more than one application will be submitted, RCCoC will designate an eligible applicant to be the collaborative applicant that will collect and combine the required application information from all applicants and for all projects that the RCCoC has selected for funding. The collaborative applicant will also apply for Continuum of Care planning activities. If the Continuum is an eligible applicant, it may designate itself;
	2. If only one application will be submitted, that applicant will be the collaborative applicant and will collect and combine the required application information from all RCCoC projects that the Continuum has selected for funding and apply for Continuum of Care planning activities;
5. Retain all of its responsibilities, even if it designates one or more eligible applicants other than itself to apply for funds on behalf of the Continuum. This includes approving the Continuum of Care application.
6. Establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers.
7. Coordinated Entry System
	1. The RCCoC will operate a coordinated entry system that will provide a comprehensive assessment of the needs of individuals and families for housing and services. It is designed to be easily accessed by individuals and families seeking

housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.

The system is designed to coordinate program participant intake, assessment, and provision of referrals. The RCCoC Board will oversee the operation of the coordinated entry system.

1. **Amendments**

**A.** This Charter will be reviewed annually and updated as needed.

B. Amendments or changes to this Charter will be recommended by the Board to the Membership at the Annual meeting. Majority vote of membership will be required for passage. The RCCoC will notify members of any proposed changes to this Governance Charter at least two weeks in advance of the Annual meeting.

Appendix 1 STATEMENT OF DISCLOSURE

The Rensselaer County Continuum of Care Governance Charter requires an annual disclosure of interests in all programs and agencies under the purview of the Board. "Interest" is defined as a situation in which a Board member or a member of his/her family has an interest in, financial or otherwise, whether as owner, fiduciary, employee or consultant, or supplier of goods or services, any program or agency under the purview of the Continuum of Care Board. "Family" shall, at a minimum, include a domestic partner or dependent children.

I hereby identify that I have an interest (as defined above) in the following programs or agencies: Name of agency/program \_

Name of Person ------------------ o self o family member

Role --------------------

Name of agency/program ----------------------

Name of Person ------------------ o self o family member Role

|  |  |  |
| --- | --- | --- |
| Name of agency/program --------------Name of Person ----------------- | ----- o self | ----o family member |
| Role  |  |  |

Signature of Board Member Date

# Appe nd ix 2

CARES Regional HMIS Governance Charter

### The following document describes the governance responsibilities for the CARES Regional HMIS and patiicipating agencies. This will apply to all CoCs i n contract with CARES for HMIS System Administration.

Planning and Software Selection

*HMIS Planning and Strategic Activities* - CARES, Inc. will ensure that activities related to HMIS growth and use are developed, reviewed regularly, and in accordance with the CoC's goals.

*HMIS Program Milestones Development* - CARES, Inc. Identifies general milestones for project management, including trai ning, expanded system functionality, etc.

### *Universal Data Elements* - CARES, Inc. ensures that the HMIS is able to manage the collection of each data variable and corresponding response categories for the Universal Date Elements as outlined in the HMIS Data and Technical Standards.

*Progmm-Specific Data Elements* - CARES, Inc. ensures that the HMIS is able to manage the collection of each data variable and correspond ing response categories for the Program-specific data elements as outlined in the HMIS Data and Technical Standards.

*Unduplicated Client Records* - CARES, Inc. ensures the HMIS is able to generate a summary report of the number of unduplicated client records that have been entered into the HMIS.

*APR Reporting* - CARES, Inc. ensures the HMIS is consistently able to produce a reliable APR. *HMIS Reports* - CARES, Inc. ensures the HMIS generates other client served, utilization summary, and demographic repotts both at the system and program levels for purposes of understanding the nature and extent of homelessness in the CoC.

HMIS Management and Operations - Governance and Management

*HMIS Governance Strncture* - CARES, Inc. ensures a HMIS governance model is developed and formally documented between the HMIS Lead Agency/grantee and the community planning body(ies). Ensures that a formal agreement that outlines management processes, responsibilities, decision-making structures, and oversight of the HMIS project has been executed (as evidence by a Memorandum of Understand ing, Letter of Agreement, or similar such documentation).

CARES, Inc also regularly monitors the HMIS Lead/Grantee and the CoC HMIS Oversight entity on adherence to the agreement.

*HMIS Ove1"Sigltt Inclusive Participation* - The CoC ensures membership of the HMIS steering committee or advisory board is inclusive of decision makers representing the CoC and community.

### *HMIS Technical Support* - CARES, Inc. provides technical expettise commensurate with the general HMIS program oversight; provides timely suppoti on high level technical matters; reviews and authorizes HMIS Software changes in response to the changing requirements of participating agencies; and, generally reviews and authorizes special issues brought to it by pmiicipating agencies. *HMIS Software Technical Support* - CARES, Inc. provides technical expertise commensurate with the requirements of the HMIS software and/or system; provides timely support on software technical matters; is responsible for implementation of authorized changes to the HMIS software and processes; and, generally implements resolutions to any special issues authorized by the HMIS Technical Suppoti Entity within the software and/or overall system.

*HMIS IT Issue Tracking -* CARES, Inc. maintains a regularly updated list of HMIS system service requests, activities, deliverables, and resolutions.

*HMIS IT Issue Monitoring (Community Levelj* - CARES, Inc. regularly reviews HMIS System service requests, activities, deliverables and resolutions. Provides authoritative supp01t when necessary to expedite IT issue resolution.

*HMIS Staff Organization Citart* - CARES, Inc. maintains a current and accurate\_ organization chatt that clearly identifies all team members, roles and responsibilities, and general work activities/functions. This organization chart is available for review upon request to Nancy Chiarella, CARES, Inc. (518) 489-4130 x l 03 or nchiarella@caresny.org

*HMIS Software Tmining* - CARES, Inc. provides regular training on software usage, software and data security, and data entty techniques to participating agencies. Develops, updates, and disseminates data entry tools and training materials. Monitors and insures system.

*HMIS User Feedback -* CARES, Inc. manages and maintains mechanisms for soliciting, collecting, and analyzing feedback from end users, program managers, agency executive directors, and homeless persons. Feedback includes i mpressions of operational milestones and

progress, system functionality, and general HMIS operations. Examples of feedback include satisfaction surveys, questionnaires, and focus groups

*System Opemtion and Maintenance* - CARES, Inc. is responsible for the day to day operation and maintain of the HMIS System.

*HMIS Management Issues* - CARES, Inc. ensures that the HMIS is managed in accordance to CoC policies, protocols, and goals.

*HMIS Progmm Milestones Monitoring -* CARES, Inc. monitors milestones, notes variances, and reports variances to CoC membership.

### *Agency and Progmm HMIS Participation* - CARES, Inc. regularly monitors program and agency­ level patticipation in HMIS via comparison of point-in-time census of beds/slots versus clients served and repotts findings to CoC on a regular basis. Evidence of monitoring reports are available for review.

*AHAR Participation* - CARES, Inc. ensures patticipation in the AHAR (Annual Homeless Assessment rep01t).

### *Client Consent* - Each Participating Agency ensures the completion and documentation of client consent, as appropriate with the CoC's Client Consent Policies and Protocols.

*Data and System Security* - CARES, Inc. ensures adherence by agency staff with the HMIS data and system security protocols as outlined by the CoC and the HUD HMIS Data and technical Standards.

*Data Quality Standards* - The CoC Data Quality Committee, in conjunction with CARES, Inc and the Advisory Committee's base standards, outlined in the Policy and Procedure manual, develops and enforces community level data quality plan and standards.

*Universal Data Elements* - CARES, Inc. ensures the collection of each data variable and corresponding response categories on all clients served by McKinney Vento funding.

Other

*Program-Specific Data Elements* - CARES, Inc. ensures the collection of each data variable and corresponding response categories specific to their program type on all clients served by McKinney Vento fund i ng.

*Data Quality Reports* - CARES, Inc. regularly runs and disseminates data quality reports to participating programs that indicate levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards.

*Data Quality Reports* - CARES, Inc. provides technical assistance and training in response to data quality rep01ts disseminated to patticipating programs that ind icate levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards.

*Data Quality Repol'ts* -CARES, Inc. regularly runs and disseminates data quality

### rep01is The CoC Data Committee that indicate cross program levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards.

*Data Quality Reports* - The CoC Data Committee regularly reviews data quality reports at

### community planning level on data entry completion, consistency with program model, and timeliness as compared to the community data quality standards.

HMIS Policy Development and Oversight

*Client Co11fide11tiality a11d Privacy Tl'(li11i11g* - CARES, Inc. provides regular training on client confidentiality and privacy requirements to intake staff, data entry staff and reporting staff at participating agencies. CARES, Inc. also ensures all agencies have sufficient privacy policies and protocols in place.

*Pe1forma11ce Measul'eme11t Tl'ai11i11g* - The CoC Lead Agency provides regular training and

### guidance on program performance measurement.

*Comm1111ity Planning Goals and Objectives Tl'aini11g* - The CoC Lead Agency provides training and regularly reviews the progress of the Community Planning Goals and Objectives.

*Business Pl'(lctices Training* - The CoC Lead Agency provides training and guidance on

### business practices to support CoC and HMIS policies (CoC-specific protocols, ethnics, strategies for communication, etc.)

*Progl'am Funding Tl'aini11g a11d Orientation* - The CoC Lead Agency ensures all required HMIS

### participants (McKinney-Vento funded programs such as ESG, SHP, S+C, SRO, and HOPWA projects that target homeless) have received training and orientation on regulations petiaining to McKinney Vento.

*Pal'ticipati11g Agency Documentation* - CARES, Inc. maintains documentation of the number of

### participating agencies (utilizing the system) is up-to-date. A comparative analysis of planned versus actual deployments at the project level is maintained by The CoC Data Committee.

*Participation Rates* -The CoC Data Committee regularly reviews and monitors the HMIS coverage rates of the CoC. If coverage rates have not achieved a 75% level of participation, can provide an explanation for the barriers to implementation at specific agencies. Ensures that ongoing engagement activities and harder res\_olution are occurring with nonpaiiicipating

agencies.

*Participation Rates* - CARES, Inc. provides regular repotis on HMIS patiicipation rates to CoC Subcommittee. The CoC Data Committee is encouraged to create and keep and up to date analysis of agency-specific barriers with potential solutions.

*Policies and Procedttl'es* - CARES, Inc. ensures the existence and use of HMIS Policies and

### Procedures.

*Agency Participation Agl'eement* - CARES, Inc. ensures and maintains written agreements with participating agencies that describes the protocols for participation in the HMIS.

*Data Sharing Agreements* -There is currently no data sharing within the CARES Regional HMIS.

### *HMIS End-User Agl'eement* - CARES, Inc. ensures and Maintains a written agreement with each authorized user of the HMIS, that defines pa\_rticipation protocols, including trai nmg criteria, consent protocols, system use, and prtvacy and secunty standards.

*Client Consent* - CARES, Inc. ensures that the CoC and/or implementing jurisdiction geography of

the HMIS grantee has a defined and documented client consent protocol for use as baseli ne practice among all participating HMIS users.

*Data Release* - CARES, Inc. ensures that the CoC and/or implementing jurisdiction geography of

the HMIS grantee has a defined and documented HMIS data release protocol that governs release of all data from the HMIS.

**Other Federal Requirements**

### *Drug-Free Workplace* - CARES, Inc. has adopted a drugfree workplace policy. The policy is posted and available for Review.

*Homeless Client Participation* - The CoC is responsible to ensure the patiicipation of at least one

### homeless person or formerly homeless person participates in policymaki ng. Patiicipation

can include but is not limited to governing board leadership, advisory committees, staff positions, and sub-committee positions.

*Conflict of Interest* - CARES, Inc. has adopted a conflict of interest policy for board members,

### staff, and volunteers.

*Equal Opportunity and Non-Discrimination Policy* - CARES, Inc. has adopted an equal opportunity and non-discrimination