

**CoC NY-511: Binghamton/Uniontown, Broome, Chenango, Cortland, Delaware, Otsego,
& Tioga Counties**

Policies & Procedures

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CoC NY-511 Mission

The Coalition is dedicated to improving the lives of individuals and families at-risk of or experiencing homelessness by advocating for and providing permanent solutions for the problems of homelessness with a focus on racial equity in the Southern Tier of New York State. The values of racial equity and centering voices of people with lived experience are integral to the work of the Coalition.

Value Statement

To accomplish this mission, the Coalition has adopted a set of values that guide its actions, orienting the Coalition in specific ways towards its mission. The Coalition (through the Board and its committees) will endeavor to make funding, program, and policy actions that are aligned with its stated values. These values will guide the actions of all Coalition Committees established under these Policies & Procedures:

- *Recommendations and decisions will reflect the diversity of people experiencing homelessness.*
- *The Coalition will promote equity for communities of color disproportionality affected by homelessness.*
- *Decisions and recommendations made by the Board and Committees will reflect a cross-sector and regional approach.*
- *The Coalition will operate with transparency and inclusiveness.*
- *Members of the Coalition take shared responsibility and accountability for addressing unconscious biases in decision-making.*
- *Coalition leadership will establish clearly defined roles and responsibilities and communicate decisions clearly and widely.*

Ending homelessness for all requires creating a homelessness response system that centers client voices, responds to community needs, and eliminates inequities.

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Article 1: Coalition Structure, Membership, and Meetings

1.01 Coalition Membership

The Coalition shall be composed of community representatives that are organized to plan for and provide a system of outreach, engagement, and assessment; emergency services; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of persons at-risk or experiencing homelessness within the Coalition's geographic area.

Coalition membership is open to everyone. Members of the Coalition represent and may include human services agencies, businesses, faith organizations, homeless or formerly homeless persons, community members, and public agency representatives.

1.02 Coalition Member Responsibilities

Coalition member responsibilities include, but are not limited to, attendance of at least nine (9) Coalition meetings per year with no more than 3 unexcused absences and active participation in at least one (1) committee. Coalition member agencies are responsible for designating an agency representative to cast votes on Coalition business at Meetings of the Membership and for ensuring an agency representative is in attendance at Coalition and committee meetings. Additionally, Coalition members are responsible for:

Ensuring the operation of the Coalition: The Coalition shall, on an annual basis and in accordance with voting policy and procedure, ensure the operation of the Coalition by establishing, reviewing, and updating Operating Policies and Procedures. The Coalition shall, on an annual basis and in accordance with voting policy and procedure, designate Coalition Board of Directors Members to act as its leadership board. Coalition Membership will work to maintain a level of diversity that is proportional to the population served in NY-511 among the membership of its Board of Directors. Functioning as HUD Continuum of Care (CoC) NY-511 and maintaining HUD compliance as such.

A) Designating and monitoring a Collaborative Applicant: The Coalition shall, on an annual basis and in accordance with voting policy and procedure, designate and establish monitoring policies and procedures for an eligible entity to act as its Collaborative Applicant. The Coalition shall, on an annual basis, enter into a formal, written contract with the Collaborative Applicant for services.

B) Designating and monitoring an HMIS Lead Agency: The Coalition shall, on a triannual basis and in accordance with voting policy and procedure, designate and establish monitoring policies and procedures for an eligible entity to act as its HMIS Lead Agency. The Coalition shall, on a triannual basis, enter into a formal, written contract with the HMIS Lead for HMIS services and shall:

- a. Establish HMIS Policies and Procedures: The Coalition shall, on an annual basis and in accordance with its committee structure and voting policy and procedure, review, update, and authorize HMIS policies and procedures, including privacy, security, and data quality standards and their associated monitoring/improvement plans.
- b. Ensure HMIS compliance: The Coalition shall, on an annual basis and in accordance with its committee structure and voting policy and procedure, monitor, review,

- update, and authorize HMIS activities to ensure compliance with HUD and other federal state, and local requirements.
- c. Ensure HMIS Participation: The Coalition shall monitor that all recipients of financial assistance under the Coalition and ESG programs and any programs funded previously through McKinney-Vento Act (SHP, SPC, SRO) are using the HMIS to collect client-level data on persons served.
 - d. Designate the HMIS software: The Coalition shall, on a triannual basis and in accordance with voting policy and procedure, designate a single software solution as its HMIS software.
- C) Conducting Strategic Planning: The Coalition shall establish a strategic plan for preventing and ending homelessness within its geographic boundaries. The Coalition shall establish an evidence-based system for system monitoring and evaluation to support strategic planning and reporting. The Coalition will monitor, review, and update the goals outlined in the Strategic Plan on an annual basis.
- D) Establishing a performance-based program evaluation system for conducting a fair and transparent funding allocation procedure: To ensure that funding allocation is conducted in a manner to support the Coalition's strategic planning, the Coalition shall, on an annual basis and in concert with the data-evidenced needs of persons at-risk or experiencing homelessness within its geographic boundaries, establish an HMIS data-dependent, performance-based policy and procedure for determining funding allocations. The funding allocation procedure will include:
- a. Ensuring integrated strategic planning with ESG and the Con Plan
 - b. Establishing and monitoring performance measures and targets for the Coalition's broader homeless service system, in accordance with the Coalition's strategic plan
 - c. Establishing and monitoring performance measures, targets, and outcomes for Coalition programs, including HUD CoC and ESG programs, in accordance with the Coalition's strategic plan
 - d. Establishing policies and procedures for reallocation discussions with HUD CoC and ESG projects that perform poorly
- E) Establishing and operating a system of coordinated entry: The Coalition shall establish and operate a system of coordinated entry, assessment and referral for persons at-risk of and experiencing homelessness within its geographic boundaries.
- F) Establishing Written Standards: The Coalition shall establish written standards that ensure all persons at-risk of or experiencing homelessness gain access to, are assessed for, and referred to needed services in a consistent, fair, equitable, and fair manner. The Written Standards also include the Emergency Transfer Plan¹ for Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking.
- G) Report the outcomes of ESG and CoC projects to HUD annually: The Coalition shall ensure that its programs meet all requirements for reporting outcomes to HUD, other federal, state, and local entities in an accurate, complete, and timely manner.
- H) Staying current with and knowledgeable about all federal, state, and local funding and policy change: The Coalition shall establish a policy and procedure for ensuring that its members stay current and knowledgeable about all applicable federal, state, and local funding requirements and policy.

¹ *STHC's Emergency Transfer Plan is clearly outlined in the CoC's Written Standards and meets the requirements under 24 CFR 578.99(j)(8). (24 CFR 578.7(d)).*

- I) Adherence to the Code of Conduct outlined in *Section 1.06* below.
- J) Coalition members and staff are encouraged to complete the Diversity Assessment Tool annually, and new members and staff are encouraged to complete the Diversity Assessment Tool as part of the membership application form, as it is essential that the CoC tracks its strengths and deficits to provide the most effective leadership.

1.03 Membership Recruitment and Outreach

The Coalition will identify and address membership gaps in essential sectors, from key providers or other vital stakeholders. The Governance Committee will recruit members to ensure that it meets all membership requirements set forth in its by-laws, including representation of certain populations and certain organizations. At least annually, the STHC will issue a public invitation for new members. Each member agency must have an active representative on at least one (1) committee. The Governance Committee will conduct outreach to obtain membership from at least the following groups as they exist within the geographic area:

- Nonprofit homeless assistance providers
- Victim services 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
- Homeless and formerly homeless persons

1.04 Dues

The Coalition shall fix in its by-laws and shall collect such annual dues from its membership as may be necessary to enable it to maintain itself and discharge all of its duties and obligations. The Coalition Board may increase or reduce annual dues in accordance with its voting rules and recorded in the Board's official meeting minutes. Any agency, organization, corporation, or individual who wishes to be such a member and who meets the requirements defined in *Sections 1.01-1.02* above shall pay membership dues by January 31st of each calendar year. STHC's membership year shall begin on the first day of February and continue through the last day of January of the following calendar year. Should an application be submitted after the first of February, that membership will be valid through the last day of January. Membership applications can be found on the CARES website: [511 - Membership & Governing Docs | CARES of NY, Inc. \(caresny.org\)](#). Failure to meet the requirements articulated in *Sections 1.01-1.02* above will result in suspension of voting rights. The Coalition

Board will act as the fiscal officer for the dues. Membership dues shall be set by December 1st each year for the following year.

- A) **Waivers:** The Coalition reserves the right to grant waivers to organizations and individuals as it is advantageous to the Coalition. Applications for waivers of membership dues will be approved by the Coalition Board, in accordance with its voting rules, and recorded in the Board's official meeting minutes.
- B) **Eligibility for Waivers:** Eligibility criteria for waivers granted to an organization or individual member will be determined on an individual basis. Eligibility for waivers will be determined on financial hardship.
- C) Voluntary donations to the Coalition by an individual and/or organization for Coalition or committee activities shall not be considered payment of dues.
- D) Organizations who are granted a waiver or reduction will offset its dues with 'in-kind' assistance by providing a representative from their organization on at least one (1) subcommittee. The choice of subcommittee will be decided with the assistance of the Board to ensure subcommittee coverage is adequate. The member agency must also guarantee 75% participation at committee and membership meetings.

Non-dues paying members with a waiver may attend coalition meetings, sit on committees at any level, and vote on committee matters, but are not eligible for membership on the Board of Directors. Persons with lived experience are exempt from dues contributions and are eligible for membership on the Board of Directors.

1.05 Coalition Meetings

- A) Meetings of the Membership will be held the third Wednesday of each month. As a courtesy, a written notice of and agenda for each regular meeting shall be posted to the Coalition Member and Key Partner list serves and other social media, as appropriate, 7 calendar days prior to each regularly scheduled meeting, and this posting shall constitute sufficient notice of the meeting. Coalition meetings may be held by videoconference, Skype, and other forms of video communication.
 - a. **Special Meetings:** The Coordinator (or President in the Coordinator's absence) shall utilize the regular meeting notification policy and procedure for calling a special meeting of the membership. The posting of the special meeting notice and agenda will constitute sufficient notice of the special meeting.

1.06 Code of Conduct

STHC Members shall maintain the highest standard of conduct; act with fairness, integrity, and dignity, and in a manner not detrimental to the interest of the public, their employer or the STHC. Members shall not violate any laws in the performance of their duties within the STHC.

STHC (Coalition) Members shall:

- Serve their Coalition faithfully, respect confidentiality, and avoid conflicts of interest and activities for personal gain at the expense of the Coalition or fellow members
- Communicate in a manner that is respectful and honest, and refrain from making disparaging remarks toward or about fellow Coalition members
- Foster an environment where the interaction among members is conducted fairly, and avoid discrimination, harassment and/or abuse of any sort
- Serve all members of the Coalition impartially, provide no special privilege to any individual member, and accept no personal compensation from a member except with the

- knowledge and consent of the Coalition's governing Board
- Maintain competence in promoting Coalition objectives through continued professional development
- Support the Coalition in its efforts to advance the profession of housing and services for the homeless
- Advise the Coalition Board President and Vice President regarding any contemplated actions or decisions which they know to be illegal or unethical; and shall further advise the Board President and Vice President of the possible consequences of proceeding with such actions or decisions.

This Code of Conduct serves to enhance public confidence in the integrity and service of the Southern Tier Homeless Coalition members. Adherence to this Code is required for Membership in the Coalition, and the Coalition shall interpret and enforce the Code in the manner set out in the Coalition's formal discipline process (as specified in the Coalition's Bylaws).

As a Member of this Coalition, I agree to abide by this Code.

Signature

Printed Name

Agency Name (if applicable)

Date

1.07 Communication

To ensure communication and transparency in Coalition business, the Coalition shall maintain, at a minimum, un-moderated Coalition Member and Key Partner list serves to facilitate the operation of Coalition business.

1.08 Grievance Procedure

The Coalition shall put in place a written grievance policy. The policy shall include both an informal grievance procedure and a formal grievance procedure.

1.09 Reporting of Alleged Violations of Coalition By-Laws, Policies, and Procedures

The Coalition Board members are charged with administering the Code of Conduct, Whistleblower Protection Policy, Conflicts of Interest & Related Party Transaction Conflicts Policies, Audit Oversight Policy, and Prohibited Conduct Policy in accordance with Articles 10-11 of the Coalition's Corporate By-Laws. Copies of the policies shall be made publicly available.

1.10 Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Coalition by-laws, policies, or procedures or submitting a grievance must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any

allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false shall be viewed as a serious disciplinary offense, which may include loss of membership and/or voting privileges.

1.11 Whistleblower Policies

Persons presenting alleged violations of the Coalition by-laws, policies, and procedures or submitting a grievance in accordance with Article 10 Section 5 of the Coalition's Corporate By-Laws shall be protected from retaliation.

The Coalition and the board shall not retaliate against any officer, board member or individual who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of the Coalition or the board that the individual reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate of public policy concerning the health, safety, welfare, or protection of the environment.

Article 2: Committees

All members of the Coalition will be required to identify, on an annual basis, which committee(s) of which they will be an active member.

At least the following populations and categories will be represented:

- Substance Users
- Veterans
- Homeless
- Mentally Ill
- Domestic Violence
- Community
- Youth
- HMIS
- Criminal Justice
- HIV/AIDS
- LGBT
- Chronically Homeless
- Legal
- Families with Children
- Education
- Grantee Representatives
- ESG Recipients
- Formerly Homeless

2.01 Participation

Each member of the Coalition will participate in at least one committee annually. Coalition member agencies are responsible for ensuring an agency representative is in attendance at Coalition and committee meetings.

2.02 Meetings and Action of Committees

All committees will meet on a regular basis. All Committees shall take meeting minutes and attendance. Committees may be given roles, responsibilities, and authorities at the discretion of the Coalition Board of Directors. A committee may nominate and approve its chair and co-chair without approval of the Coalition Board. If a committee chair or co-chair is not nominated and approved within the committee structure, the Coalition Board may appoint one. All meetings of committees are subject to the Open Meetings Act and all provisions thereof.

2.03 Terms

The term of a standing Committee Chair or Ad Hoc Committee Chair will be determined by the committee.

Article 3: Finances

3.01 Disbursement of Funds

All expenditures of organizational funds are to be monitored by the Treasurer and Board of Directors. Absent an emergency situation (e.g., major water problem), expenditures exceeding \$1000.00 for any one item or service must be approved by the Board. In the event of an emergency, the President, with the approval of at least one Officer may spend additional funds required to abate or resolve the emergency. It is understood that organizational funds needed to cover routine expenditures, such as utility bills and contractual agreements, may be made as needed without Board approval; however, they will be monitored by the Treasurer.

The Coalition may establish certain accounts for use and appropriation of ad hoc committees. In such event, the use of such funds must be reported to the Treasurer as used and a monthly accounting of such funds must be made by the ad hoc committee chairperson to the Coalition. The Coalition may limit the use and scope of use of such funds at any time. The Coalition may close such account at any time. The Treasurer will be a signatory on any such account created by the Coalition.

3.02 Officers Eligible to Sign Checks

All disbursement of funds not described in Paragraphs 1, 2, and 3 of this Article, shall be made by check signed by two officers. Those eligible to sign shall be President, Vice President, Treasurer and Secretary.

See Appendix D (Financial Policy) for further information.

Article 4: Mandatory Filings

4.01 Mandatory Filings

The Coalition Executive Board shall be responsible for ensuring that all mandatory filings, including Federal and State tax returns, are completed and submitted in a timely manner in order to maintain non-profit status.

Article 5: Continuum of Care Communication

5.01 Transparency

To ensure communication and transparency in CoC business, the CoC shall maintain, at a minimum, un-moderated CoC Member and Key Partner list serves to facilitate the operation of CoC business.

Between CoC meetings, the CoC leaders will keep members involved by the following methods:

- Maintaining a directory of CoC members, as well as updating and distributing it regularly
- Establishing working groups to move the work of the CoC forward between meetings
- Encouraging partners with similar interests to join forces, either by sharing information/best practices or working on strategies to collaborate and support each other's efforts
- Sharing information regularly to maintain a focus on homelessness in general and the Continuum in particular

5.02 Information Sharing

Methods of sharing information between CoC meetings will include:

- Information sent out via email list
- Information added to the CoC website, including:
 - o Information on the work of the Continuum
 - o Resources
 - o Plans and implementation
 - o Research and data
 - o Funding availability

Article 6: Collecting Continuum of Care Needs Data and Inventorying System Capacity

6.01 Collection Methods

Annually, the CoC should review the housing and services available to people experiencing homelessness within the community. The methods to undertake this review include:

- Homeless Counts
- Housing Inventory
- Services Inventory

The CoC should determine how to conduct the counts and inventories taking into consideration that these activities are also required by HUD. HUD's recommendations for conducting homeless counts and housing/services inventories are described below and should serve as a guide to the CoC in determining the methods to adopt each year.

HOMELESS COUNTS

The Continuum of Care Application for McKinney-Vento homeless assistance funding requires CoCs to produce "statistically reliable, unduplicated counts or estimates of homeless persons in sheltered and unsheltered locations at a one-day point in time." CoCs are also asked to report the number of homeless persons in seven subpopulation categories:

- Chronically homeless
- Severely mentally ill
- Chronic substance abusers
- Veterans
- Persons with HIV/AIDS
- Victims of domestic violence
- Unaccompanied youth (under 18 years of age)

HUD encourages CoCs to base population and subpopulation estimates on local data stored in Homeless Management Information Systems (HMIS) and/or collected through shelter and street counts.

Aside from the HUD mandate to collect this information, there are many reasons why the CoC chooses to collect accurate, reliable data on our local homeless populations:

- To identify community-specific service needs and gaps
- To further understand the causes of homelessness and design more effective responses
- To use in planning and program development
- To raise public awareness of the challenges facing people experiencing homelessness
- To accurately measure and identify the needs of populations that are the hardest to serve

The CoC will coordinate a point-in-time count of sheltered and unsheltered homeless people in the last ten days of January (between January 22nd and 31st) at least once every two years (on odd-numbered years). If resources allow, the CoC will conduct this count annually.

Sheltered Homeless Count

The sheltered count is an inventory of people accessing shelter on a particular evening. It will include homeless people who are spending the night in:

- Emergency shelters
- Cold weather shelters
- Domestic violence shelters
- Residential programs for runaway/ homeless youth
- Transitional housing
- Hotel/motel/apartment voucher arrangements paid by a public/private agency because the person or family is homeless and
- Permanent supportive housing for homeless persons (Information on persons living in permanent supportive housing units will be used to determine the capacity rate of those programs; they will not be included in the total homeless count number)

The following information will be collected in the sheltered count:

- Number of households with dependent children (couples or single parents/guardians with children)
- Number of persons in households with dependent children (adults and children)
- Number of households without dependent children (households composed of individuals including unaccompanied youth, couples, and other adult-only households)
- Number of persons in households without dependent children (adults and unaccompanied

youth)

The following populations will not be included in the count number reported to HUD:

- Persons who are living doubled up in conventional housing
- Formerly homeless persons who are residing in Section 8 SRO, Shelter Plus Care, SHP permanent housing or other permanent housing units
- Children or youth, who because of their own or a parent's homelessness or abandonment, now reside temporarily and for a short, anticipated duration in hospitals, residential treatment facilities, emergency foster care, detention facilities and the like
- Adults living in mental health facilities, chemical dependency facilities, or criminal justice facilities

To collect Sheltered Count data, the CoC will:

- Extract the data from HMIS OR
- Use extrapolation techniques to estimate the number and characteristics of sheltered homeless persons from data gathered at most emergency shelters and transitional housing programs OR
- Send surveys to housing providers collecting the required data on the specified night of the sheltered count

If the CoC decides to survey housing providers to collect data, the CoC will:

- Provide written instructions to providers to explain the protocol for completing the sheltered point-in-time count
- Train providers on the protocol and data collection forms used to complete the sheltered point-in-time count
- Remind all agencies of the scheduled count and follow-up with providers to ensure the maximum possible response rate from all programs
- Use HMIS to verify data collected from providers for the sheltered count
- Use strategies to ensure that each sheltered and unsheltered homeless person was not counted more than once during the point in time count

Unsheltered Homeless Count

The unsheltered count is an inventory of people experiencing homelessness who are not accessing shelter either by choice or due to a lack of shelter bed availability. The count will include homeless people found in places not meant for human habitation, including streets, parks, alleys, parking ramps, parts of the highway system, transportation depots and other parts of transportation systems (e.g. subway tunnels, railroad cars), all-night commercial establishments (e.g. movie theaters, laundromats, restaurants), abandoned buildings, building roofs or stairwells, chicken coops and other farm outbuildings, caves, campgrounds, vehicles, and other similar places.

The following information will be collected in the unsheltered count:

- Number of households with dependent children (couples or single parents/guardians with children)
- Number of persons in households with dependent children (adults and children)
- Number of households without dependent children (households composed of

individuals including unaccompanied youth, couples, and other adult-only households)

- Number of persons in households without dependent children (adults and unaccompanied youth)

To collect Unsheltered Homeless Count data, the CoC will choose one or a combination of the following methods:

- Conduct a known location count (a point-in-time count based on observation of unsheltered persons without interviews)
- Conduct a known location count with interviews (a point-in-time count combined with either interviewing all unsheltered homeless persons encountered during the public places count or a sample of these individuals.)
- Conduct a service-based count (interview people using non-shelter services, such as soup kitchens and drop-in centers, screen for homelessness, and count those that self-identify as unsheltered homeless persons; in order to obtain an unduplicated count, every person interviewed must be asked where they were sleeping on the night of the point-in-time count)
- Extract data from HMIS (use HMIS to collect, analyze or report data on unsheltered persons)

To ensure reliable data from the unsheltered count, the CoC will:

- Conduct trainings for point-in-time enumerators
- Use HMIS to check for duplicate entries or for some other purpose
- Use strategies to ensure that each unsheltered homeless person was not counted more than once during the point-in-time count

Subpopulations

The CoC will also coordinate a count of persons who fall into certain subpopulations, using data from a point-in-time count conducted during the last ten days of January (between January 22nd and 31st) at least once every two years (on odd-numbered years). If resources allow, the CoC will conduct this count annually.

Only adults will be included in the subpopulations count, except for the Unaccompanied Youth (those under age 18) category. Subpopulation data is required for sheltered persons and optional for unsheltered persons, with the exception of Chronic Homeless status.

Data collected for the subpopulation analysis includes:

- Chronic homeless status
 - o Length of time the person has been homeless this time
 - o How many times the person has been homeless in the past 3 years
 - o Whether the person has a disability
- Disability status by category
 - o Severe mental illness
 - o Chronic substance abuse
 - o HIV/AIDS
- Victim of domestic violence
- Veterans
- Unaccompanied youth (under 18)

To collect subpopulation data, the CoC will:

- Extract the data from HMIS OR
- Conduct interviews with a random or stratified sample of sheltered homeless adults and unaccompanied youth, extrapolating the results to the entire sheltered homeless population to provide statistically reliable subpopulation estimates for all sheltered persons OR
- Conduct interviews with every homeless person staying in an emergency shelter or transitional housing program on the night designated for the point-in-time count OR
- Ask providers to use individual client records (e.g., case management files) to provide the CoC with subpopulation data for each adult and unaccompanied youth living in a sheltered program on the night designated for the point-in-time count

If the CoC does not collect this information from HMIS, the CoC will:

- Provide written instructions to providers to explain the protocol for completing the subpopulations count
- Train providers on the protocol and data collection forms used to complete the subpopulations count
- Remind all agencies of the scheduled count and follow-up with providers to ensure the maximum possible response rate from all programs

Housing Inventory

Every year the CoC will collect data to complete a housing inventory. This inventory will occur at a single point-in-time in the last ten days in January. The date of the housing inventory will be the same date as the point-in-time sheltered and unsheltered count. If the CoC conducts the homeless count every-other year, the housing inventory must be conducted every year and will occur in the last ten days in January.

For each program that houses persons experiencing homelessness, the CoC will collect data on:

- The number of beds and units currently serving individuals and families
- The number of beds and units created in the past year (“new inventory”)
- The number of beds and units that are fully funded but not yet serving homeless people (“under development”)

Housing inventory data must be obtained from all emergency shelters, transitional housing, and permanent supportive housing programs in the CoC, including those programs that do not receive HUD funding. Data collected from permanent supportive housing programs will be focused only on the beds and units that are dedicated to housing persons who are formerly homeless. The number of vacant emergency shelter, transitional housing, and permanent supportive housing units must be collected for the unmet need determination.

To collect Housing Inventory data, the CoC will annually:

- Use HMIS data to complete the Housing Inventory Chart OR
- Conduct a housing inventory survey (via mail, fax, e-mail, web-based, phone or on-site) of homeless providers, which will include the previous year’s Housing Inventory Chart and instruct providers to review and update housing inventory information on the specified night of the housing inventory

If the CoC decides to collect housing inventory information via a survey, the CoC will:

- Provide written instructions to all homeless providers on how to report an accurate bed inventory
- Systematically train provider-level staff on how to obtain an accurate bed inventory
- Include definitions of key terms used in the inventory chart, such as seasonal and overflow beds (these definitions can be found in the instructions accompanying the CoC Application); for projects serving both individuals and families, it may also be helpful to provide guidance on how to distinguish between family units, family beds, and individual beds
- Follow-up with providers (e.g., via telephone, email, or in-person) to ensure the maximum possible response rate and accuracy of the housing inventory information
- After receiving the inventory information, confirm the information with each provider to verify the accuracy of the data

6.02 Services Inventory

The CoC will collect information on the services available to homeless people. This service inventory will include:

- Prevention activities
 - o Mortgage assistance
 - o Rental assistance
 - o Utilities assistance
 - o Counseling/ Advocacy
 - o Legal Assistance
- Outreach
 - o Street Outreach
 - o Mobile Clinic
 - o Law Enforcement
- Supportive Services
 - o Case Management
 - o Life Skills
 - o Substance Use
 - o Mental Health Counseling
 - o Healthcare
 - o HIV/AIDS
 - o Education
 - o Employment
 - o Childcare
 - o Transportation

Article 7: Determining Unmet Need and Prioritizing Gaps in the Continuum of Care Homeless System

Annually, the CoC should review the data collected as a result of the homeless counts and housing/services inventories, and determine what housing and services are needed given the homeless populations. The methods to undertake this review include:

- Determining Housing Needs
- Calculating Unmet Needs

- Prioritizing Gaps

There are many methods available to conduct these reviews. The CoC should determine how it will conduct these reviews guided by HUD's recommendations, which are described below.

Each year the CoC must tell HUD what housing for homeless people we need in our community, including the need of families and individuals for Emergency Shelter beds, Transitional Housing beds, and Permanent Supportive Housing beds. This information is also necessary for the long-term program and strategic planning that we do as a community.

HUD's standardized methodology for calculating unmet need uses point-in-time and Coordinated Entry System data as well as local provider expertise to calculate an initial estimate of unmet need. Because the estimates from the standardized methodology may not reflect all that is known about the homeless population in our community, the CoC may also convene key community stakeholders to discuss the initial estimates and determine if adjustments are necessary to reflect other local information.

7.01 Determining Housing Needs

Unmet need reflects the difference between a CoC's bed capacity and the number of homeless persons in the CoC at one point-in-time. Thus, most information for the unmet need calculation is collected as part of the point-in-time homeless count and housing inventory process, except the housing needs of the community. To determine the housing needs of homeless persons who are residing in emergency shelter, transitional housing, and persons who are unsheltered, the CoC will gather expert opinions of homeless assistance providers and review duplicate data as demonstrated through Coordinated Entry reports.

The CoC will obtain the housing needs of sheltered homeless persons by asking each emergency shelter and transitional housing provider listed in the Housing Inventory Charts to estimate the percentage of their clients that need emergency shelter, transitional housing, and permanent housing to ultimately resolve their homeless situation.

When determining housing needs, the CoC will remember that:

- Each person or family should be placed in the one program type that will best assist the household in resolving homelessness
- The calculation of unmet need for each program type (emergency shelter, transitional housing, or permanent supportive housing) should be done separately for unaccompanied individuals and persons in families with children; this is necessary to accurately reflect the bed capacity needs for each group

7.02 Calculating Unmet Need

The CoC will begin by using the following standardized formulas for calculating unmet need by program type (emergency shelter, transitional housing, and permanent supportive housing):

- Unmet need for Emergency Shelter (ES) = (The number of unsheltered homeless persons who need ES + the number of persons currently in ES who will only need ES) - (Total number of ES beds + ES beds under development)
- Unmet need for Transitional Housing (TH) = (The number of unsheltered homeless persons

- who need TH + the number of persons in ES who need TH + the number of persons in TH who will only need TH) - (Total number of TH beds + TH beds under development)
- Unmet need for Permanent Supportive Housing (PSH) = (The number of unsheltered homeless persons who need PSH + the number of persons in ES who need PSH + the number of persons in TH who need PSH) - (Total number of vacant PSH beds + PSH beds under development)

7.03 Adjusting Unmet Need for Local Realities

The CoC will convene local providers and other knowledgeable persons to discuss the initial unmet need calculations. The CoC may then adjust the unmet need numbers in the way that best represents the unmet need in our community. This discussion and unmet need adjustment may include:

- CoC stakeholders meeting and reviewing data to determine the CoC's unmet need
- The CoC applying results from local studies or other data sources to help determine unmet need
- The CoC using local point-in-time enumeration data and applying national or other local statistics to calculate unmet need
- The CoC using HMIS data (e.g., counts of homeless persons, analysis of subpopulation needs as compared with specialized program beds, or bed inventory) to calculate unmet need
- The CoC applying results from national studies or other national statistical information on homelessness to help determine unmet need

7.04 Prioritizing Gaps

In order to develop strategies to address the unmet needs identified above, the CoC will determine and prioritize gaps in the Continuum of Care.

Process for Determining Relative Priorities

Determining gaps and their relative priority are fundamental steps in the CoC strategic planning process. Decisions regarding the relative priority of gaps are the basis for developing strategies to deploy new resources or re-deploy existing resources to best assist people who are homeless to obtain and maintain permanent housing and self-sufficiency.

All CoC members (homeless providers and other stakeholders) will be invited to be involved in the decision-making process to determine and prioritize gaps.

To determine and prioritize gaps, the CoC will:

- Use Homeless count, housing and service inventories, and unmet need data at monthly committee meetings
- CoC members will consider and discuss several criteria when prioritizing unmet needs, including:
 - o Vulnerability of sub-populations (because of age, diagnosis)
 - o Groups not yet served versus those with some housing resources in place
 - o Relative need among sub-populations
 - o Whether a certain need is growing and if so, how rapidly
 - o Users of high-end services (e.g., hospitalization, detoxification)

- o Gaps in each major housing type (transitional, permanent supportive housing, and permanent housing)
- o Whether there are sufficient services to serve persons already in emergency shelter, transitional housing programs, or permanent housing
- o What services are missing to help people move to permanent housing or permanent supportive housing
- o What services are essential to certain subgroups, and whether they are missing
- o Are there major gaps in the homeless system or missing linkages among components of the system (i.e. outreach, intake, referral, assessment)
- A list of housing, service and system gaps will be created
- CoC members will then vote to prioritize the gaps
- The gaps that receive the most votes shall be set as the highest priority
- Low priority does not mean that there is not an unmet need; rather, it means that relative to other unmet needs or gaps, it is less of a priority

Specific to HUD Continuum of Care Program Homeless Assistance Grants, projects will be reviewed and prioritized annually via the protocol outlined in the CoC's *CoC Program Competition Evaluation Process Instructions*.

Article 8: Reviewing and Prioritizing Projects for Funding

Continuum of Care Homeless Assistance Grants are administered by HUD under the McKinney-Vento Homeless Assistance Act.

8.01 General Procedure

HUD CoC Funds are granted based on a national competition following the Notice of Funding Opportunity (NOFO). Immediately when HUD's Continuum of Care NOFO is released, the CoC coordinates the following process:

- The NOFO Committee considers community priorities, then designs and presents scoring tools and materials to the CoC for approval; the CoC considers and approves the scoring tools and materials.
 - o Community priorities have already been discussed through the CoC strategic planning, needs assessment, and gaps analysis process (please see the Gaps Analysis/ Needs Assessment Policy for more details)
- Information regarding the NOFO and the community's process and requirements are disseminated to all CoC and other interested parties (all homeless service and housing providers in the continuum of care area) via the following open solicitation methods:
 - o Letters/emails
 - o Responses to public inquiries
 - o Outreach to faith-based groups
 - o Announcements at CoC meetings
 - o Announcements at other meetings
 - o Published in newspapers
- Any agency interested in applying for funds will be required to complete a Letter of Interest and must be submitted by the posted due date
- Applications and additional information are collected and reviewed according to procedures described below

- A Rating & Ranking Committee is created according to procedures described below
- The Rating & Ranking Committee conducts an interview with each applicant where the committee will provide feedback on the application, ask questions for clarification purposes, and pinpoint any errors or omissions in the application
- Final project applications are collected and submitted to HUD

8.02 Funding Priorities and Local Need

Services and housing for homeless are needed in all aspects within our community, however, there are specific areas that are of greatest need and will be a funding priority for the CoC. Creating funding priorities is driven by the community's needs assessment and gaps analysis. All organizations in the CoC that participate in the gaps analysis process have a voice in determining the community's priorities for funding. Funding priorities are established through a fair and open process using objective criteria. (Please see the Gaps Analysis/ Needs Assessment Policy for more details.)

Through this gaps analysis process, the following areas have been identified as funding priorities:

- Permanent Supportive Housing serving all target populations
 - In the event that the applications exceed the amount available, priority will be given for projects serving 1) chronically homeless, 2) individuals, and 3) families
- Renewals of successful operating projects are a priority to remain funded if the need for the project still exists in the community
 - The CoC will review each project at the time it seeks renewal funding to determine if the project is performing satisfactorily and is meeting the needs of persons it proposed to serve or whether local needs have changed and other subpopulations or types of assistance should be given preference
- To maximize the funds available to new projects, renewal projects may apply for only one year of funding (if, after all projects have been submitted, the community has not requested the full amount available from HUD, renewal projects may be approved for multiple-year funding)
- Remaining funds (after the funding of successful one-year renewals) from the HUD designated Pro Rata amount for our CoC are available through the competitive application process.

8.03 Procedures for Project Application Submissions

- Proposals must be submitted via e-snaps by the identified due date
- A PDF version of the application and all additional requested information must be emailed to the HMIS Administrator/CoC Coordinator
- Specifics regarding due dates, submission requirements, and proposal format will be distributed and reviewed

8.04 Application Eligibility Threshold Review

Projects must pass a threshold review before being submitted to the Rating & Ranking Committee. A pre- designated representative of the CoC will complete the threshold review to verify the eligibility of:

- Applicant

- Project
- Activity
- Completeness of application

This review will take place prior to the applications submission to the Rating & Ranking Committee for reading and scoring. Proposals not completely meeting threshold review criteria will not be forwarded to the Rating & Ranking Committee for further consideration. Proposals completely meeting eligibility threshold review criteria will be submitted to the Rating & Ranking Committee and will be scored according to the scoring criteria.

8.05 Rating & Ranking Committee Policies

Eligible proposals will be prioritized for inclusion in CoC's coordinated application by the Rating & Ranking Committee. Applications not scoring high enough will not be placed on the project funding request in Exhibit 1.

Goals for each application cycle will be based on specific evaluation criteria, and the HUD Committee will establish minimum requirements in order to maximize competitiveness of the Continuum's application. Examples of these application minimums include, but are not limited to, housing/service funding ration requested and amount of leverage.

Scoring tools are created by the HUD Application Committee and approved by the Executive Committee of the CoC. Using these scoring tools, the Rating & Ranking Committee will review the following objective rating measures to assess the performance of projects seeking funding:

- CoC monitoring findings
- HUD monitoring findings
- Independent audits
- HUD APRs for performance results
- Unexecuted grants
- Site visits
- Surveys of program clients
- Project readiness
- Expenditure of grant funds (fast or slow)
- Cost effectiveness of the project
- Provider organization experience
- Provider organization capacity
- Project presentation
- CoC membership involvement
- HMIS participation involvement
- Match funds committed to project
- Leverage letters committed to project
- Percentage of housing funds requested
- Other priorities, to be determined by the CoC (based on NOFO priorities)

The CoC recruits Rating & Ranking Committee members who are knowledgeable about homelessness and housing in the area and who are broadly representative of the relevant sectors, subpopulations, and geographic areas. The Rating & Ranking Committee will be

composed of representatives from a cross-section of groups which might include: Faith-based and non-profit providers of homeless services and housing; housing developers; city representatives; Kings and Tulare Counties employees; mental health; substance abuse; veteran's services; and consumers.

- Rating & Ranking Committee members must sign a statement declaring that they have no conflict of interest and a confidentiality agreement
- Members must be appointed every year, their eligibility verified, and approved by the NOFO Committee
- Members must be able to dedicate time for application review and committee meetings as directed by the NOFO Committee or their designee
- Rating & Ranking Committee members (3-5) are trained. The Rating & Ranking Committee Training includes:
 - o Information regarding homeless activities, needs, services, definitions, and other issues that are pertinent to the CoC
 - o A background of McKinney Vento and the local process
 - o The role of the Rating & Ranking Committee
 - o Review of the scoring tools, applications, and resources
- Rating & Ranking Committee members receive eligible applications and scoring materials
- All Rating & Ranking Committee members review all applications over a one-week period
- Rating & Ranking Committee meets to review and discuss each application together and to individually score them; the CoC HUD consultant is present at the Panel meeting to record decisions of the Panel and any comments/ recommendations they have for applicants
 - o The Panel discusses the merits of each proposal, scores the applications, and turns in score sheets to CARES
 - o Overall raw scores are calculated by CARES
 - o The Committee determines the rank of all projects considering all available information
 - o During deliberation, the CoC consultant will provide technical assistance by responding to questions of the Panelists, correcting technical inaccuracies if they arise in conversation, and reminding the Panelists of their responsibilities if they step outside their purview
- Scoring results are delivered to applicants with a reminder about the appellate process.
 - o Applications which do not meet the threshold requirements will not be included in the Priority List in Exhibit 1, and therefore will not be forwarded to HUD for consideration
 - o If more applications are submitted than the CoC has money to fund, the lowest-scoring applications will not be included in the Priority List in Exhibit 1, and therefore will not be forwarded to HUD for consideration

8.06 Policy for Appeals of Rating & Ranking

All agencies receive their project scores and are offered the opportunity to debrief with CARES. Debriefing allows agencies the opportunity to request clarification regarding how/why Application question/s received certain scores. Debriefings are required if agencies are considering an appeal. Agencies may choose to appeal project score/s within the allotted time frame (see the **Appeals**

Process outlined below). After all debriefings with CARES are completed and appeals considered by the Rating and Ranking Panel, the project ranking is presented to the Board for approval.

- **Who May Appeal?**

An agency may appeal a decision concerning a Renewal or New/Bonus project application submitted by that agency.

- **What May Be Appealed?**

The appeals process applies to project scoring and ranking *only*. *There is no appeal for project tiering*. An appeal may *not* be based on the following:

- Failure to answer any question/s on the application
- Failure to submit required attachments to the application
- Failure to submit the application by the required deadline

- **Any mathematical errors found by an applicant will be corrected by CARES.**

- **Timing of an Appeal**

Formal appeals may be submitted by a project within **3 (three) business days** of debriefing. Appeals must be submitted in writing to CARES (hschmidhamer@caresny.org), who will then forward to the impartial committee determined by the NOFO Committee. The written appeal must consist of a brief statement no longer than one page, and can be in the form of a letter, memo or email.

- **Appeals Decisions**

Appeals will be considered by an impartial committee determined by the NOFO Committee. The impartial committee will communicate its final decision. Appeals are decided by majority vote of the impartial committee, and once decided, are final and may not be overturned by the NOFO Committee, Board or Membership.

Final Prioritized List of Applications

The final prioritized list of proposals must be approved by the general membership of the CoC. Any CoC members with a conflict of interest (e.g. employed by an applicant agency) must abstain from the vote approving the priority list. This list will be forwarded to HUD; individual applications and supporting documentation, signature pages, and required attachments must be incorporated into the final Exhibit 1 of the Continuum of Care application. Funding is typically based upon the prioritized list of applicants who were submitted, however, actual awards/award amounts are determined by HUD.

Article 9: Homeless Management Information System

The primary purpose of a Homeless Management Information System (HMIS) is to aggregate data on homelessness at local and national levels to accurately describe the scope of homelessness and the effectiveness of efforts to ameliorate it. Beyond data collection, HMIS provides significant opportunities to improve access to and delivery of services for people experiencing homelessness and to strengthen community planning and resource allocation.

9.01 HMIS Participation

All ESG and HUD Continuum of Care funded agencies must participate in HMIS. Non-ESG and HUD Continuum of Care funded agencies are also required to participate in HMIS in the following

order:

- 1) Providers of emergency shelter, transitional housing, and homeless outreach services, regardless of whether they receive funding through the McKinney-Vento Act
- 2) Providers of permanent supportive housing funded by other HUD programs (HOPWA, CDBG, and HOME)
- 3) Homelessness prevention programs, supportive services only programs, and non-federally funded permanent housing programs.

The CoC will encourage all providers to include all of their homeless-dedicated beds in HMIS. The CoC will work to ensure at least 65% bed coverage for emergency shelter, transitional housing, and permanent supportive housing. The CoC will review and assess its HMIS bed coverage annually.

9.02 HMIS Committee

The HMIS Committee has created separate HMIS Policies and Procedures which include the following policies:

- HMIS access, use, and data dissemination
- Agency participation requirements
- Ensuring security and confidentiality of information within the system
- Ensuring that only trained, designated staff have access to the data
- Monitoring security and confidentiality requirements for participating agencies
- Reviewing the quality of client-level and program-level data
- Assessing compliance with HMIS Data and Technical Standards
- Conducting trainings on privacy/ethics, data security, data quality, and HMIS software
- Developing streamlined, user-friendly means for collecting and inputting data
- Conducting trainings to help agencies implement HMIS policies

The HMIS Committee will provide ongoing outreach to agency and community leadership to cultivate and maintain support and understanding of the HMIS initiative.

9.03 Operational Use of HMIS

The HMIS must:

- Collect unduplicated counts of individuals and families experiencing homelessness
- Analyze patterns of use of applicable assistance provided for the Continuum of Care
- Provide information to project sponsors and applicants for needs analyses and funding priorities
- Be developed in accordance with standards established by HUD, including standards that provide for—
 - o Encryption of data collected for purposes of HMIS
 - o Documentation, including keeping an accurate accounting, proper usage, and disclosure, of HMIS data
 - o Access to HMIS data by staff, contractors, law enforcement, and academic researchers
 - o Rights of persons receiving services under HUD Homeless Assistance Grant-funded programs
 - o Criminal and civil penalties for unlawful disclosure of data
 - o Such other standards as may be determined necessary by HUD

9.04 HMIS Systems Administrator

The HMIS Systems Administrator is responsible for the following:

- Providing operation, security, maintenance, system auditing, and technical support of HMIS central hardware, software, and connectivity
- Setting up and managing user accounts, access levels, and passwords
- Providing technical and user support for HMIS software, including agency account set-up, system monitoring and testing, problem diagnosis and resolution, and routine software and information maintenance
- Providing and coordinating ongoing training and technical support for the system
- Coordinating regular end-user meetings to discuss software updates, data entry, report writing, and system management issues
- Serving as initial point of contact for end-user questions and concerns
- Assessing compliance with the HMIS Policies and Procedures
- Maintaining contact with the software product developer to ensure consistent and uniform communication among product support personnel and the community
- Generating information on the community's homeless and housing situation for community planning, advocacy, and funder reporting requirements
- Assisting end users in the creation of custom reports and queries
- Monitoring and approving the dissemination of data collected through the HMIS
- Providing regular aggregate data reports to agencies and the greater community

Article 10: CoC Project Reporting Requirements: Annual Performance Reports

Annual Performance Reports (APRs) are required by HUD on an annual basis to track the progress and accomplishments of HUD's Continuum of Care Homeless Assistance Programs. The APR gathers information on how programs assist homeless persons to obtain and remain in permanent housing, increase skills and income, and attain greater self-determination. This information is used by HUD and Congress to assess outcomes from federal funding. The APR is also useful to the CoC, grantees, and sponsors as a planning and management tool to analyze client demographics and service needs; to evaluate project outcomes; to make improvements; and to set future goals for their projects.

1. Grantees and sponsors receiving HUD Continuum of Care Homeless Assistance funding must report their annual progress to HUD through an Annual Performance Report (APR) submitted for each year in which HUD funding is provided.
 - o A separate APR must be submitted for each HUD grant received
 - o If a project extension is received for a partial year, then an APR must be submitted for the operating year and another APR submitted for the extension period
 - o For grants being transferred, the exiting grantee must complete an APR as of the time of transfer
2. Information must be collected and maintained on each participant in the HUD-funded project for the APR. If the project serves more people than those served with the HUD

funds, the APR should only include data on those served with the HUD funds.

- o Standard client data collection tools should be used to collect the information for the APR, such as the HUD-developed optional worksheets attached to the APR form or a locally-developed data collection tool (ideally, information should be collected through the HMIS; however, data can be collected manually or through an alternative computerized system)
 - o Data collection and retention responsibilities should be clearly assigned and included in employee job descriptions, or in Memoranda Of Understanding with other agencies, if they are responsible for collecting the data
 - o All staff providing services to clients should be trained in how to accurately use the data collection forms
 - o Data must be turned in to the Continuum of Care's HMIS on a periodic basis
3. Grantees and sponsors must respond to all questions in the APR unless a written agreement has been reached with the HUD Field Office identifying questions which can be answered using estimates or skipped.
4. Information to be collected for the APR includes:
- o General project information, including the dates of the operating year and the program type and component
 - o Client information, including household type, demographic and special needs information, prior living situation, income, length of stay in the project, supportive services received while in the project, reason for leaving the project and destination upon leaving the project
 - o Progress in achieving program goals
 - o Financial information, including match and project expenditures for the operating year
 - Grantees and sponsors must track and keep records documenting the match received and utilized
 - A Cash Match Documentation file should be kept for each project, including grantee cash expended, matching funds committed in the technical submission and actual match amounts received
 - For Supportive Housing Program grant recipients, cash match tracking must be kept by source and by use and activity (e.g. match received and expended on housing operations should be tracked separately from match received and expended on supportive services)
 - For Shelter Plus care grants, a standard data collection tool should be developed for collecting service match information from supportive services providers about the supportive services they have provided; data should be collected at regular intervals
5. Files for each project's APR must be maintained, including at a minimum:
- o The client and financial information used to complete the APR
 - o Grantee name and contact information
 - o Project sponsor name and contact information
 - o Operating start date
 - o Date of reminder notice
 - o APR due date

- o Date of overdue notice, if applicable
 - o Date received
 - o Dates of any interim correspondence regarding requests for additional information, if applicable
 - o Date of approval letter
 - o Date APR was submitted to local HUD office
6. The APR must be submitted within 90 days after the end of each operating year.
 - o The due date for the APR should be part of the grantee/sponsor's master calendar for tracking grant compliance activities
 7. Projects should use the APR data collected to evaluate and improve the project, for needs assessment, trend analysis and future planning.

Article 11: Annual Homeless Assessment Report

The Annual Homeless Assessment Report (AHAR) is a report by HUD to the U.S. Congress on the extent and nature of homelessness in America. It is based on data from Homeless Management Information Systems and on information from Continuum of Care (CoC) Exhibit 1s. The AHAR provides estimates of the number of homeless persons nationally, a descriptive profile of homeless persons, and an analysis of service use patterns. For CoC's gathering and submitting this data to HUD, the local AHAR report provides useful information on homelessness and service needs at the local level.

11.01 Data Collection Method

The HMIS Lead agency for the CoC is responsible for completing the local AHAR. Client level data for the AHAR will be collected through the Homeless Management Information System (HMIS) based on HUD's universal data elements which all communities receiving HUD Homeless Assistance funding are required to collect and maintain and which are the same data elements used to generate HUD's Annual Performance Reports (APRs).

- Unduplicated data will be collected for the four standard AHAR reporting categories: Emergency Shelter-Individuals, Emergency Shelter-Families, Transitional Housing-Individuals and Transitional Housing-Families. Data will also be collected for any supplemental reporting categories established by HUD.
- In order to participate in the AHAR, the CoC's HMIS must be capable of:
 - o Producing a one day point-in-time count, average day count, and longitudinal counts.
 - o Identifying clients with multiple program use—e.g., how many people in ES-IND were also served in TH-IND.
 - o Counting persons by household type—e.g., individual adult male, adult in household with children, or unaccompanied youth.
 - o Generating frequencies by basic demographic characteristics.
 - o Cross-tabulating total length of stays within each program-household type, by gender and age.
 - o Totaling the number of households with children by program type.

All agencies receiving HEARTH funding will submit on monthly basis information to the HMIS on each client served, including data needed for the AHAR report.

11.02 Data Quality

The CoC has established continuum-wide data quality control procedures to ensure the accuracy and completeness of AHAR data collected and reported. These procedures address data collection as well as running of reports, data review, and obtaining feedback on the data.

The AHAR data review will address at a minimum the following three areas. In areas where problems are identified, concrete steps to address the problem will be identified and carried out.

- HMIS bed coverage (total # of beds in HMIS divided by # of beds in the CoC) must be at least 50% in one or more of the reporting categories. If bed coverage is lower, the CoC will work to increase provider participation.
- Bed utilization data (# of people served on a given night divided by the # of available beds that same night) must be based on accurate entry and exit dates for clients. For utilization rates below 60% or above 105%, the CoC will contact the provider and review raw data.
- Data completeness as evidenced by a low rate of missing data across all questions. If the percentage of missing data is high, the CoC will contact providers to identify and address problems.

The AHAR data will also be reviewed to identify:

- CoC, program or user level problems
- Client level problems records
 - Anomalies between data collected between similar programs
- Anomalies between data collected in recent period vs. previous ones
- Other discrepancies

The CoC will work with participating providers regarding the AHAR data collected to confirm accuracy of information collected.

The CoC will provide quarterly HMIS trainings on data collection and quality for front-line staff who are engaged in data entry activities.

On an annual basis (according to HUD's designated data collection schedule), the CoC will de-duplicate and aggregate the client information collected to produce and submit a local AHAR data report using a standardized template.

- The AHAR data collection period is October 1st to September 30th of each year.
- The CoC will submit the aggregated local AHAR report electronically through the AHAR Exchange to the HUD-designated private research firm, responsible for compiling the national AHAR.
- A draft AHAR report will be submitted by the HUD-designated date.
- The CoC will work with the AHAR Research team to correct any data problems and submit a final AHAR report by the HUD-designated date.

Appendix A: Rating & Ranking Committee Conflict of Interest
and Confidentiality Statement

Definition of Conflict of Interest

No person with a “conflict of interest” may serve on the Rating & Ranking Committee. A conflict of interest exists if:

- 1) You are now, or within the last year have been, or have a current agreement to serve in the future as, a Board member, staff member or paid consultant of an organization making a proposal for funding; or
- 2) Your employer or an organization on whose Board of Directors you sit, now has, or within the last year has had, a contractual relationship with an organization making a proposal for funding. However, under this second definition of “conflict of interest,” no conflict exists if your employer, or the organization on whose Board of Directors you sit, is a funding entity or organization whose mission includes providing services and/or funding to other service providers; or
- 3) Any other circumstance exists which impedes your ability to review and rank the proposals for funding objectively, fairly, and impartially.

Confidentiality

In addition to avoiding Conflicts of Interest, the Rating & Ranking Committee should maintain confidentiality surrounding the rating and ranking process. To demonstrate respect for the organizations being considered, Rating & Ranking Committee discussions and information about specific applications should be kept confidential.

Acknowledgement

I have read and understand the definition of “Conflict of Interest.” No conflict of interest prohibits me from serving on the Rating & Ranking Committee. Should I later become aware of a conflict of interest, I immediately will resign from the Rating & Ranking Committee.

Signature

Date

Appendix B: Approving Committees for Planning Lead, HMIS Lead, and CE Lead Work

Task	Board	Governance	HMIS/CE Committee	Membership	NOFO
Coordinated Entry Lead					
Review/Revise Coordinated Entry Policies & Procedures	<input checked="" type="checkbox"/> 2 nd	<input type="checkbox"/>	<input checked="" type="checkbox"/> 1 st	<input type="checkbox"/>	<input type="checkbox"/>
HMIS Lead					
Approve PIT Methodology Forms	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> 1 st	<input type="checkbox"/>	<input checked="" type="checkbox"/> 2 nd
Approve the Longitudinal Systems Analysis (LSA)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> 1 st	<input type="checkbox"/>	<input checked="" type="checkbox"/> 2 nd
Approve the System Performance Measures (SPMs)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> 1 st	<input type="checkbox"/>	<input checked="" type="checkbox"/> 2 nd
Review the Longitudinal Systems Analysis (LSA)	<input checked="" type="checkbox"/> 1 st	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> 2 nd	<input type="checkbox"/>
Review/Revise HMIS Policies & Procedures	<input checked="" type="checkbox"/> 2 nd	<input type="checkbox"/>	<input checked="" type="checkbox"/> 1 st	<input type="checkbox"/>	<input type="checkbox"/>
Planning Lead					
Approve CARES Scope of Work	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Approve CoC Registration	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Approve HIC/PIT Process	<input checked="" type="checkbox"/> 2 nd	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> 1 st
Approve Monitoring Tools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> 2 nd	<input checked="" type="checkbox"/> 1 st
Approve NOFO Priorities/Written Standards	<input checked="" type="checkbox"/> 2 nd	<input checked="" type="checkbox"/> 3 rd	<input type="checkbox"/>	<input checked="" type="checkbox"/> 4 th	<input checked="" type="checkbox"/> 1 st
Approve Rank & Review Process	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> 2 nd	<input checked="" type="checkbox"/> 1 st
Approve Rank & Review Team	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> 2 nd	<input checked="" type="checkbox"/> 1 st
Approve Rank & Review Tiering	<input checked="" type="checkbox"/> 2 nd	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> 3 rd (if time)	<input checked="" type="checkbox"/> 1 st

Approve Rank & Review Tool (Part 1 & 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> 2 nd	<input checked="" type="checkbox"/> 1 st
Complete Grant Inventory Worksheet (GIW) (Agencies Must Confirm their own numbers first)	<input checked="" type="checkbox"/> 3 rd	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> 2 nd	<input checked="" type="checkbox"/> 1 st
Review the System Performance Measures (SPMs)	<input checked="" type="checkbox"/> 1 st	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> 2 nd	<input type="checkbox"/>
Review/Revise By-Laws	<input checked="" type="checkbox"/> 2 nd	<input checked="" type="checkbox"/> 1 st	<input type="checkbox"/>	<input checked="" type="checkbox"/> 3 rd	<input type="checkbox"/>
Review/Revise Grievance Policies & Procedures	<input type="checkbox"/>	<input checked="" type="checkbox"/> 1 st	<input type="checkbox"/>	<input checked="" type="checkbox"/> 2 nd	<input type="checkbox"/>
Review/Revise Operating Policies & Procedures	<input checked="" type="checkbox"/> 2 nd	<input checked="" type="checkbox"/> 1 st	<input type="checkbox"/>	<input checked="" type="checkbox"/> 3 rd	<input type="checkbox"/>

Appendix C: Timeline of Annual Activities

	HIC/PIT	Competition/ Application	Governance	ESG	Data
January	<ul style="list-style-type: none"> • Finish unsheltered PIT preparation (Unsheltered PIT Leads/NOFO Committee) 	<ul style="list-style-type: none"> • Approve Rank & Review Timeline (NOFO Committee) 		<ul style="list-style-type: none"> • Convene ESG Volunteer Panel to Review ESG Applications (NOFO Committee selects the Panel; Panel Convened by City of Binghamton) 	
February	<ul style="list-style-type: none"> • Confirm/Collect sheltered information (Planning Lead/HMIS Lead) 	<ul style="list-style-type: none"> • CoC Registration (Planning Lead drafts/Board votes to approve) • Approve Rank & Review Process (NOFO Committee Approves/then sent to membership for approval) 	<ul style="list-style-type: none"> • Annual Membership Renewal/New Membership Applications (Planning Lead Sends; Board Secretary Collects) • Collect Membership Dues (Planning Lead sends; Treasurer Collects; Accountant tracks receipt of the dues; Accountant/Secretary should compare to make sure all members have paid dues) • Update Membership/Stakeholder Listserv (Secretary/Accountant will determine; CARES will update accordingly) 		<ul style="list-style-type: none"> • SPMs Review *Depend on HUD's timing (HMIS Committee/NOFO Committee/Membership)

	HIC/PIT	Competition/ Application	Governance	ESG	Data
March	<ul style="list-style-type: none"> • Confirm/Collect unsheltered information (Unsheltered PIT Leads/HMIS Lead) • Confirm/Collect sheltered information (Planning Lead/HMIS Lead) 	<ul style="list-style-type: none"> • Approve Rank & Review Tool Part 1 (NOFO Committee/Approved by Board/Membership) • Complete GIW (Planning Lead/Board/membership votes to approve) 	<ul style="list-style-type: none"> • Annual Membership Renewal/New Membership Applications (Planning Lead Sends; Board Secretary Collects) • Collect Membership Dues (Planning Lead sends; Treasurer Collects; Accountant tracks receipt of the dues; Accountant/Secretary should compare to make sure all members have paid dues) 		<ul style="list-style-type: none"> • SPMs Submitted (HMIS Lead)
April	<ul style="list-style-type: none"> • Enter Data into HDX (HMIS Lead) • Draft memo of annual changes in numbers for HIC/PIT for board/membership review (Planning Lead) • Vote to approve submission of HIC/PIT data (Board/Membership) • Submit finalized data to HUD (HMIS Lead) 	<ul style="list-style-type: none"> • Approve Rank & Review Tool Part 2 (NOFO Committee/Approved by Board/Membership) 		<ul style="list-style-type: none"> • Make ESG Allocation Recommendations to City of Binghamton (NOFO Committee /Members hip) 	
May		<ul style="list-style-type: none"> • Review NOFO Priorities/Written Standards (Governance Committee Approves/Then) 	<ul style="list-style-type: none"> • Review By-Laws Annually (Governance Committee/then sent to Board/Membership) 		

	HIC/PIT	Competition/ Application	Governance	ESG	Data
		<p>Board/Membership Approve)</p> <ul style="list-style-type: none"> • CoC Application *Depending on HUD (Planning Lead) • Appoint Rank & Review Team (NOFO Committee/Approval by Membership) 			
June		<ul style="list-style-type: none"> • Review NOFO Priorities/Written Standards (Governance Committee) • CoC Application (Planning Lead) • Appoint Rank & Review Team (NOFO Committee/Approval by Membership) 	<ul style="list-style-type: none"> • Review By-Laws Annually (Governance Committee/then sent to Board/Membership) • Nominations for Board Slate (Governance Committee) 		
July		<ul style="list-style-type: none"> • Written Standard Approval (Board/Membership) • CoC Application (Planning Lead/CoC-funded agencies) 	<ul style="list-style-type: none"> • Approve By-Laws (Board/Membership) • Nominations for Board Slate (Governance Committee) • Plan the CoC 101 presentation and Annual meeting (Planning Lead/Board) • Membership Drive (Community Awareness Committee) 		
August		<ul style="list-style-type: none"> • CoC Application (Planning Lead) • Approve Rank & Review Tiering 	<ul style="list-style-type: none"> • Annual Meeting: Approve Board Slate, Train Membership on By-Laws, CoC 101 Presentation, 		

	HIC/PIT	Competition/ Application	Governance	ESG	Data
		(Board/Membership)	Committee Sign-Ups (Planning Lead leads in collaboration with Board, occurs at Membership)		
September		<ul style="list-style-type: none"> Submit CoC Application (Planning Lead writes & submits/ board and membership vote to approve) 	<ul style="list-style-type: none"> Review CE P&P/Manual (CE Committee/Board/Membership Approval) 	<ul style="list-style-type: none"> Send Request for ESG Applications to Membership (Planning Lead/City of Binghamton) 	
October		<ul style="list-style-type: none"> Draft CoC Debriefing (Planning Lead) 	<ul style="list-style-type: none"> Review CE P&P/Manual (CE Committee/Board/Membership Approval) 		<ul style="list-style-type: none"> LSA Review (HMIS Committee/Board/Membership)
November	<ul style="list-style-type: none"> Approve PIT Date (NOFO Committee) Review HIC/PIT Process (Planning Lead/HMIS Lead draft; Board approves) Select Unsheltered PIT Leads (NOFO Committee) 	<ul style="list-style-type: none"> Present CoC Debriefing to the Board (Planning Lead) 	<ul style="list-style-type: none"> Draft Scopes of Work (Planning Lead/HMIS Lead) 		

	HIC/PIT	Competition/ Application	Governance	ESG	Data
December	<ul style="list-style-type: none"> • Approve PIT Collection Forms (NOFO Committee) • Collect Agency Methodology Forms (NOFO Committee) • Train Unsheltered PIT Leads (Planning Lead) 		<ul style="list-style-type: none"> • Review/Approve Scopes of Work for Contractors (Board) • Review/Approve Memoranda of Understanding (Board) 		<ul style="list-style-type: none"> • LSAs submitted *Depends on HUD (HMIS Lead)

Appendix D: Financial Policy

CONTINUUM OF CARE (NY-511) COALITION FOR THE HOMELESS OF THE SOUTHERN

Tier, NY, INC., aka Southern Tier Homeless Coalition (here in after referred to as STHC)

FINANCIAL POLICIES AND PROCEDURES

STHC is a nonprofit New York corporation organized under section 501c3 of the Internal Revenue Code. Like most nonprofit organizations, its principal funding sources are derived from private and governmental grants and individual donors. To protect the investment of its stakeholders, STHC is committed to conducting its financial operations within the confines of an effective internal control environment. The following policies and procedures have been implemented to achieve this goal. Segregation of duties has been incorporated to the greatest extent possible. In certain instances where such segregation may not be feasible due to member limitations, compensating controls have been implemented.

This document refers to the following financial positions: Board President, Board Vice President, Board Treasurer, Accountant.

STHC's financial statements are prepared on a monthly basis. Net revenues and expenses are classified based on the existence or absence of donor-imposed restrictions.

- Revenue, from cost-reimbursement governmental grants, is recognized when eligible expenses are incurred.
- Revenue, from governmental fees for service, is recognized in the period earned.
- Contributions are recorded when received.
- Contributions of donated non-cash assets are recorded at their fair values in the period received.

A. BOOKKEEPING PROCEDURES

1. Cash Receipts, Bank Deposits and Receivables

In order to accurately account for all cash received, the following procedures are to be followed:

- All mail is to be opened by the Board President, Treasurer, or Accountant.
- All checks are given to the Treasurer or Accountant.
- The Accountant will then photocopy and file each copy.
- Checks are restrictively endorsed "For Deposit Only". Any cash (paper currency or coin) will be recorded on receipts and labeled with an explanation as to its source and purpose.
- The completed deposit is to be brought to the bank by the Accountant for processing within one week of receipt
- The Accountant will record each transaction in Quickbooks (the CoC's accounting program which is password protected).
- A copy of the deposit slip is to be attached to the copy of the corresponding check and filed in the deposit file.

STHC shall adhere to donor/funder restrictions imposed by said donors/funders.

2. Cash Disbursements and Payables

STHC does not utilize a purchase order system. All major purchases (over \$500.00) require Executive Board and CoC approval. Prior to any vendor payment being made to an unincorporated independent contractor, a completed Form W-9 is to be obtained.

- All mail is to be opened by either the Board President, Treasurer, or Accountant.
- Vendor invoices with appropriate supporting documentation are to be forwarded to the Board President, Treasurer, and Accountant for verification, signature and approval. Approved vendor invoices are to be given to the Accountant for recording in Quickbooks.
- The accounting category will be indicated by the Board President and/or Treasurer and/or Accountant.
- All paid invoices must be maintained in the paid invoice file.
- All disbursements are made by pre-numbered checks or online via debit.
- Voided checks are preserved and filed after "VOID" is written on them.
- Checks should NOT be made payable to Cash.
- A copy of each signed check should be attached to the corresponding invoice/documentation.
- Signed checks should be mailed within 48 hours of signing.

3. Check Printing and Signing

- The Accountant will inform the President of payment(s) that need to be made.

- The Board President will sign and approve all payment(s).
- The Accountant will then complete the requested check and the Treasurer, Board President or designated officers will sign the check(s).
- All prepared and signed checks are to be photocopied and attached to corresponding documentation.
- Debit payments are approved by the Board President who initials the confirmation of completed transactions.

4. Bank Reconciliations

- Bank reconciliations are to be completed on a monthly basis by the Accountant and reviewed by the Finance Committee.
- The Treasurer and Board President should initial the bank reconciliation upon review.
- Any material discrepancies are to be reported to the Board President and the Treasurer.

5. eLOCCS Drawdown

- The Treasurer or Accountant will complete bi-weekly drawdowns on STHC's line of credit on eLOCCS.
- The Board President will approve, by signature, all receipts of drawdowns made by the Treasurer or Accountant.
- The CoC eLOCCS Administrator is responsible for creating drawdown user accounts.

6. Payments

- Payments are prepared on a bi-weekly basis or an as needed basis by the Treasurer.
- The Board President gives final approval and approves any check distribution.
- The Accountant inputs the payment into Quickbooks and payment is made via check.

7. Journal Entries

- All journal entries are prepared by the Accountant and reviewed on a quarterly basis by the Finance Committee.
- The Finance Committee works with the Accountant to periodically

reconcile the general ledger totals.

8. Accounting Records

- Paper accounting records are kept by the Accountant and are locked each evening.
- Unused checks are kept locked in a double locked area.
- Electronic accounting records are kept on a computer-based system that is password protected and backed up.

B. BUDGETS, FINANCIAL STATEMENTS AND COMMUNICATION TO FINANCE COMMITTEE

Annually or as needed, the Board President and Treasurer prepare a budget for the corporation's fiscal year. This draft is then reviewed with the Finance Committee, modified if necessary, then submitted to the full CoC for approval.

Financial statements are to be prepared on a monthly basis from information contained in Quickbooks accounting software. Financial statements are created by the Accountant for review and then submitted to the Finance Committee for approval prior to the CoC monthly meeting for membership approval.

Grant program budgets are maintained separately for the varying grant years. Grant budgets are developed from and reconciled to the corporation's board-approved budget, which may be modified as new grant funds are projected. STHC's Board President, or designated applicant, is authorized to review and sign grant contracts and budgets only with CoC approval. During the course of the grant, these budgets are individually monitored (usually via the grantor's required reports) for any upcoming modification needs.

C. LINE OF CREDIT

STHC will establish a line of credit with HUD through the eLOCCS system. All requests for drawdowns on the line of credit are to be presented and executed by the Treasurer or Accountant, who is designated by HUD as the User. Additionally, all drawdowns will be authorized by the Board President who is designated by HUD as the Coordinator.

The CoC Board of Directors are to be kept apprised on a regular basis regarding all drawdowns.

D. GRANT TRACKING AND MANAGEMENT

All grants are to be managed according to the best practices and specific grant contract language.

Monthly grant entries should be done for each grant, in preparation of any monthly reports and vouchers, and journaling entries should reflect monthly income for that month, as well as covered expenses.

For HUD funding, STHC's Board President authorizes the Treasurer or Accountant to complete

eLOCCS drawdowns. Each grant should be entered as a separate Cost Center.

Grant expenses will be periodically compared to what is budgeted and variances analyzed. Income and expenses will be converted to a percentage basis as part of the analysis to determine if the grant expenses are on par with what is budgeted. Reviews will be conducted to determine if additional income is needed or if expenses must be curtailed.

E. COST ALLOCATION PROCEDURE References

2CFR 200 Uniform Administrative Requirements, Cost Principles and Audit Requirements.

Direct Costs, Allocated Costs and Indirect Costs defined.

The total cost of a grant program is comprised of the allowable direct costs incident to its performance plus its allocable portion of allocated and indirect costs. The term "applicable credits" is defined above. The terms "direct costs", "allocated costs" and "indirect costs" are defined in the following way.

Direct Costs: A direct cost is any cost that can be identified with a particular program or cost objective. For example, the entire salary of an individual who spends all of his or her time working on a single program can be charged as a direct cost to that program.

Allocated Costs: An allocated cost can directly benefit more than one program or function and can, therefore be allocated (or charged) to the benefiting programs or functions on some reasonable and equitable basis. For example, an individual spends his or her time working on a number of different programs that the agency operates. Salary and related fringe benefits can be charged to the respective programs based on the number of hours reported to each program on employee time sheets.

Indirect Costs: Indirect costs (aka Shared Cost) are those costs that are incurred by an agency that are not readily chargeable to a particular program or function, but benefit all programs and functions operated by the agency. Indirect costs are necessary to the overall operation of the agency, but a direct relationship to a specific program cannot be shown, generally, these kinds of costs are identified, pooled and charged against individual programs or funding sources using a predetermined rate.

Process

Each expense will be evaluated for the most applicable method in this order of preference – Direct, Allocated and Indirect.

Direct Cost Principles

Direct costs shall be claimed whenever possible based on the nature of the expense.

Allocated Cost Principles

When Direct costing does not apply, Allocated costing is the next best choice.

When an expense is not reasonable able to be attributed Direct or Allocated, it must be charged based on an Indirect Cost Rate. When indirect costs are charged, they shall be distributed equitably to all programs or functions of the agency using a rate designed to recover the costs established through the indirect cost plan.

Many larger nonprofits have an approved Federal Indirect Cost Rate. However, STHC does not.

F. EQUIPMENT

Equipment with an individual cost over \$1,000.00 and a useful life of three or more years will be reported as an Asset of the corporation and depreciated over its estimated useful life per generally accepted accounting procedures.

Equipment to be purchased with a value in excess of \$5,000.00 will be researched with price comparisons from at least three qualified vendors..

Equipment is labeled as property of the corporation, plus other identifying information if not readily apparent.

Equipment inventory is maintained in a binder, including serial number, date of purchase, warranty expiration and source of funding. Inventory is reconciled at least every two years.

G. CONSULTANTS

Consulting services to be purchased with a value in excess of \$1,000.00 will be researched with price comparisons and proposals/bids from at least three qualified consultants. An exception may apply when a service requires specialized knowledge and a recognized expert has no comparable alternatives. The \$1,000.00 limit applies to one-time purchases and contracts with an expected cumulative value over the course of any 12-month period.

Before work can be started, the following items must be received:

- A completed W-9 form
- A signed and dated confidentiality agreement
- A current workers compensation insurance certificate (if applicable)
- A signed and dated contract
- A signed Conflict of Interest statement

All consultants will be issued a Form 1099 as required by the IRS.

H. INDEPENDENT AUDIT

An annual audit or review will be completed for STHC. The audit or review will be conducted by an independent certified public accountant. This report deals with the credibility of the organization's financial reporting and accounting procedures. The outcome of the annual audit or review will be presented to the CoC at the next meeting following its completion.

The Treasurer and Board President will plan a meeting with the independent accountant(s) at the end of the audit to discuss any issues raised, review the audit journal entries, evaluate the audit process and plan improvements for the following year.

In the event that STHC receives Federal or State grant funds equal to or in excess of the limits that require an A-3 federal grant audit or state grant audit, such audit in compliance with generally accepted accounting standards will be completed and submitted to the appropriate governmental agency.

Signature of Board President

Date

Printed Name of Board President

Date