



## **Fairfield County Regional Continuum of Care Operating Guidelines**

### **Article I**

#### **Section 1: Name:**

**The name of the collaborative is Fairfield County Regional Continuum of Care  
AKA: Opening Doors of Fairfield County (ODFC)**

#### **Section 2: ODFC Regional CoC Mission:**

The mission of ODFC is to prevent and end homelessness in Fairfield County.

ODFC coordinates the strategies of advocacy, prevention, housing, employment, and services to ensure that episodes of homelessness are rare and of short duration and that all citizens within the region have access to safe, affordable housing.

ODFC comprises civic, religious, political, business, and not-for-profit leaders, as well as other regional stakeholders. The ODFC region includes Bridgeport, Brookfield, Darien, Easton, Fairfield, Greenwich, Monroe, Newtown, New Canaan, New Fairfield, Norwalk, Redding, Ridgefield, Shelton, Sherman, Stamford, Stratford, Trumbull, Weston, Westport and Wilton. Danbury is part of the ODFC Region for purposes of planning and coordinating efforts to prevent and end homelessness, except for the process of submitting a Consolidated NOFA Application to HUD.

#### **Section 3: Fiscal (Deferred)**

#### **Section 3A: Fiscal Calendar (Deferred)**

### **4. The Collaborative Applicant for ODFC will serve as the administrative point of contact.**

#### **Collaborative Applicant**

- The Collaborative Applicant is responsible for submitting the Consolidated NOFA Application to HUD electronically in e-snaps, on behalf of the CoC.
- The Collaborative Applicant will be responsible for submitting the Planning Grant Application to HUD. The process for use of the planning funding will be determined by the Coordinating Council. All planning funding will be used in accordance with HUD's guidelines.

**Article II: These Operating Guidelines shall serve as the governing structure for ODFC.**

**Section 1: PURPOSE & RESPONSIBILITIES**

**Section 1A: To establish and maintain a regional CoC.**

To receive funding through the U.S. Department of Housing and Urban Development (HUD), under the HEARTH Act (formerly, the McKinney Vento Homeless Assistance Act), geographic regions are required to establish and maintain a CoC. The ODFC region shall be considered to be the Regional CoC covering the towns of Bridgeport, Brookfield, Darien, Easton, Fairfield, Greenwich, Monroe, Newtown, New Canaan, New Fairfield, Norwalk, Redding, Ridgefield, Shelton, Sherman, Stamford, Stratford, Trumbull, Weston, Westport and Wilton.

**Section 1B: Coordination and development of services and housing.**

ODFC assists in the coordination and development of services and housing for homeless and those at risk of homelessness with housing needs through planning, education and advocacy. To achieve this purpose, ODFC seeks to:

1. Enhance the knowledge of the service and housing providers to address the needs of homeless and formerly homeless persons in the ODFC region.
2. Identify housing needs of homeless in Fairfield County on an ongoing basis.
3. Identify the gaps and needs of homeless households in the ODFC region on an ongoing basis and actively engage in efforts to capitalize on available local, state and federal resources to address these gaps and needs.
4. Support planning and development of housing and services to meet prioritized needs within The ODFC region.
5. Participate in the development and operation of a coordinated access system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services and helps direct those persons to appropriate providers, and which account for the unique needs of and available resources within all communities served. Assist homeless service providers in increasing collaboration and developing a more efficient provision of services.
6. Evaluate outcomes of projects funded under Continuum of Care programs and report to HUD.
7. Ensure that there is a single, functioning Homeless Management Information System (HMIS) and uniform manner to collect data for the ODFC area. Ensure there is at least an annual Point in Time count of homeless persons in the ODFC region.
8. Work with local public and private organizations to address housing and homelessness issues.
9. Align and implement a strategic plan to end homelessness, including setting goals associated with the plan and assessing work completed towards those goals.

10. Develop and implement community based and regional service evaluation tools to ensure competent, equitable and effective service-delivery for homeless and housing services.
11. Oversee annual application to U.S. Department of Housing and Urban Development (HUD) for homelessness assistance grants.

## **Article III**

### **Section 1: Committees**

ODFC shall be comprised of regionally focused committees who work with the local workgroups. These committees shall include, but shall not be limited to:

- Coordinating Council
- Executive Committee
- Standards and Evaluations Committee
- Coordinated Access and Crisis Response Committee
- Communications and Advocacy Committee
- Housing Committee
- Finance Committee
- Health and Housing Stability Committee
- Economic Security Committee
- Nominating Committee
- Funders' Collaborative
- Funding Oversight Subcommittee
- Youth Engagement Team Initiative (YETI)
- Youth Advisory Board

### **Section 2: The Coordinating Council of The ODFC Regional CoC**

The Coordinating Council is the decision making body of ODFC, and is considered the Board of Directors. The Council provides planning for ODFC and encourages the cooperation of members, preparation of reports, the evaluation of systems and the development of necessary procedures to implement policies ratified by ODFC. The role of the council includes (but is not limited to):

1. Ensuring all committees have at least one active chair.
2. Approving recommendations to ODFC policies and procedures.
3. Ensuring committees are implementing strategies and activities of ODFC.
4. Facilitating ongoing planning and strategy development.
5. Approving committee recommendations.

6. Facilitating fundraising for ODFC.
7. Reviewing and approving the annual HUD submission.
8. Representing ODFC to the public, elected officials and other community and statewide groups.
9. Making a public invitation for new members to ODFC at least annually.
10. Facilitating meetings of the full ODFC membership with published agendas no less than twice a year.
11. Facilitating ODFC Coordinating Council meetings with published agendas quarterly.
12. Ensuring operating guidelines are reviewed, updated and approved at least once every five (5) years.

## **Section 2A: ODFC Coordinating Council Composition**

The Coordinating Council serves as the Board of Directors for ODFC. The ODFC Coordinating Council is made up of representatives from each of Greater Bridgeport Opening Doors, Greater Norwalk Opening Doors, Stamford Greenwich Opening Doors, and the Danbury Continuums, including homeless or formerly homeless persons as well as other community stakeholders.

The Coordinating Council shall consist of a cross section of regional leaders including, but not limited to, municipal representatives, legislative representatives, local businesses and representatives from public, private, and not for profit organizations. The composition of the Coordinating Council shall not exceed a 35% share from greater Bridgeport, greater Norwalk Stamford-Greenwich, or Danbury communities. For the purposes of calculating representation, members of the Coordinating Council from agencies or organizations who provide substantial services in two pre-merger Continuum of Care communities shall be counted as ½ of a representative in each, representatives from agencies or organizations who provide substantial services in three pre-merger communities, shall be counted as 1/3 of a representative in each, and representatives from agencies or organizations who provide substantial services in all four pre-merger communities, including agencies and organizations with statewide interests, shall be counted as ¼ of a representative in each. Members of the Coordinating Council from agencies and organizations with state-wide interests shall not exceed 25% of the entire council. The Coordinating Council will total not more than 43 members. The Coordinating Council shall strive to achieve the participation of relevant members of organizations and projects serving homeless subpopulations within The ODFC region and may include but is not limited to:

1. Representatives from local government
2. Representation from philanthropic individuals/organizations
3. Representation from local housing and service providers
4. Members of the business community

5. Local clergy
6. Local hospitals
7. Local emergency response (police, fire services, etc.)
8. Regional representative from educational institutions and Boards of Education
9. Veterans Administration
10. Chambers of Commerce
11. Housing developers
12. Regional social services departments
13. Homeless or formerly homeless individual(s)
14. Representatives of the Collaborative Applicant
15. Representatives of Emergency Solution Grant (ESG) Funded Services
16. Representation from Domestic Violence provider
17. Representation from Emergency Shelter providers

No member shall serve more than six years consecutively.

## **Section 2B Meetings**

The Coordinating Council shall meet at least quarterly.

1. Upon a request, in writing, by at least four members of the Coordinating Council, a special meeting shall be called by the (Chair) at any time.
2. Attendance will be recorded at all Coordinating Council meetings. Members are expected to have at least a 65% attendance rating at all Coordinating Council Committee meetings.
3. Telephonic attendance at meetings is permitted.
4. Members are expected to follow the Operating Guidelines and Code of Conduct.
5. A member may resign at any time by submitting a written resignation to the Coordinating Council Co-Chairs. Resignation shall be effective upon receipt of notification.

## **Section 2C: Voting of the Coordinating Council**

1. The ODFC Coordinating Council operates by consensus whenever possible. Whenever a vote is necessary, each Coordinating Council member in good standing shall be entitled to one vote upon any motion.

2. A simple majority (50% plus 1) of the membership shall constitute a quorum for all in-person or telephonic votes. Two-thirds of the membership shall constitute a quorum for all electronic votes.
3. A simple majority vote of members shall be used to settle issues that reach an impasse.
4. Officers shall not vote unless necessary to break a tie.
5. No member shall vote on any issue where there could be a conflict of interest. (Refer to Conflict of Interest guideline.)
6. All meetings shall be open to the public, and guests are welcome to attend, but do not hold voting power.
7. Roberts Rules of Order (10<sup>th</sup> Edition) shall govern procedural questions where no operating guideline definition exists.

## **Section 2D: Nominating Committee**

A Nominating Committee shall be composed of four (4) members of the Coordinating Council. Every summer in June or July, the steering committee of each local Opening Doors continua (greater Bridgeport, greater Norwalk, Stamford – Greenwich, and Danbury) will select one (1) member to serve on the Nominating Committee. The Nominating Committee shall solicit suggestions for any recommended appointments to the Coordinating Council, Executive Committee, Officers, and Committee Co-Chairs. The Nominating Committee may meet in person, electronically or telephonically. There are no term limits on Nominating Committee members.

The Nominating Committee shall slate Members of the Coordinated Council to staggered three year terms. Any member who serves eighteen (18) months or less of a partial term to fill an unexpected vacancy shall be permitted to serve two additional complete terms. At the Annual Meeting, the full Coordinating Council shall vote on the full slate for Coordinating Council. If the Coordinating Council votes against the slate, the Nominating Committee shall offer an alternative slate to the Coordinating Council which will take place at the discretion of the Nominating Committee at either the Annual Meeting or at the next scheduled Coordinating Council meeting

The Nominating Committee shall make recommendations to the Coordinating Council for filling vacancies on the Coordinating Council on a rolling basis. Recommendations shall be presented electronically to the Coordinating Council at least five (5) days prior to any meetings at which new members will be considered. The Nominating Committee shall consider the membership goals set out in Section 2.A. above in its consideration of new members. Anyone who is selected to fill a vacancy shall remain in office for the duration of the term of office that was vacated. Nominations from the floor will not be permitted.

The Executive Committee shall be comprised of the Co-Chairs, Treasurer, Secretary, and fifteen (15) additional members of the Coordinating Council. At least three (3) members of the Executive Committee shall be primarily associated with an organization whose principle business office is located in each of Greater Bridgeport Opening Doors, Greater Norwalk Opening Doors, Stamford Greenwich Opening Doors, and Danbury. Three (3) additional members shall be “Members at Large” who will not be restricted geographically. To fill vacancies on the Executive Committee, the Nominating Committee shall meet and select a slate of candidates. The slate of Executive Committee members shall be presented electronically to the Coordinating Council at least seven (7) days prior to the Annual Meeting at which the Coordinating Council shall vote on the slate. Unexpected vacancies may be filled at any meeting following the same process as outlined for Annual Meetings. That person shall remain on the Executive Committee for the duration of the term of office that was vacated. Members of the Nominating Committee may be considered for membership on the Executive Committee.

To fill expired terms of officers, the Nominating Committee shall meet and select a slate of candidates. The slate of officers shall be presented electronically to the Coordinating Council at least seven (7) days prior to the Annual Meeting. Unexpected vacancies may be filled at any meeting following the same process as outlined for Annual Meetings. Anyone filling an unexpected vacancy shall remain in office for the duration of the term of office that was vacated. Members of the Nominating Committee may be considered eligible for election to all officer positions.

#### **Section 2E: Election of officers of the Coordinating Council**

1. The officers of the Coordinating Council shall be two co-chairs, one treasurer, and one secretary.
2. The officers will be slated by the Nominating Committee and elected by a majority vote of the Coordinating Council members at the Annual meeting. Elections will be held at the annual meeting in which each term expires. If the Coordinating Council votes against the slate, the Nominating Committee shall offer an alternative slate to the Coordinating Council which will take place at the discretion of the Nominating Committee at either the Annual Meeting or at the next scheduled Coordinating Council meeting. Candidates must have demonstrated knowledge of ODFC affairs and participated on the Coordinating Council for a minimum of one (1) year prior to election.
3. The officers shall serve a three year staggered term and can serve up to two consecutive terms. Any officer who served a partial term by filling an unexpected vacancy shall not be barred from serving two additional complete terms as long as the partial term was less than 18 months.

#### **Section 2F: Coordinating Council Officer Responsibilities**

1. Developing meeting agendas and facilitating Coordinating Council meetings.
2. Managing operational issues as needed.
3. Coordinating Council Officers may not serve as a committee chair during their leadership term.
4. The Secretary shall record all meeting minutes and keep records of ODFC.
5. The Treasurer is responsible for keeping the board apprised of the financial state of ODFC and shall make recommendations on the annual budget and the cost of contracts and potential resources required by the community to meet the short and long term goals of ODFC.

## **Section 2G: Ad-Hoc Committees**

The Coordinating Council shall be empowered to create, as needed, Ad-Hoc Committees.

## **Section 3: Coordinating Council Committees**

### **Section 3A: General Responsibilities**

ODFC Committees will facilitate the implementation of the goals of the HEARTH Act and Opening Doors-CT Committee responsibilities.

### **Section 3B: Committee Membership**

1. Although all committee meetings are open to the public, only committee members may vote in committee meetings. Committee members shall be appointed by the Chairs of the Committees. Anyone may request to join a Committee by sending a resume to any of the Chairs. Chairs shall have the discretion to determine the size and desired constituency of their committees.
2. Committee member responsibilities shall include:
  - a. Attending and actively participating in meetings throughout the year.
  - b. Representing the interest of the region.
  - c. Sharing information related to the committee with respective stakeholders.
  - d. Taking on tasks related to the respective committee's activities.

### **Section 3C: Selection of Committee Co-Chairs**

1. The Nominating Committee shall slate the Co-Chairs of all Committees. If the Coordinating Council votes against the slate, the Nominating Committee shall offer an alternative slate to the Coordinating Council.
2. Co-Chair terms shall be limited to consecutive three year terms and shall follow a staggered schedule.
3. No individual shall simultaneously co-chair more than one committee.



4. The Standards and Evaluation Committee will have three chairs – one each from Greater Bridgeport Opening Doors, Greater Norwalk Opening Doors, and Stamford Greenwich Opening Doors. In the event that the Standards and Evaluation Committee shall take up business unrelated to the Annual Consolidated NOFA Application, Danbury CoC shall be provided with a Co-Chair position that may be selected by the Danbury CoC steering committee.

### **Section 3D: Committee Co-Chair Responsibilities**

1. Facilitating the implementation goals and strategies of the Regional Alliance strategic plan, and the required HUD Community Performance Outcomes.
2. Ensuring committee membership is representative of the community's diversity, including: consumers, housing authorities, municipal government, faith communities, non-profit service providers (shelter, transitional and supportive housing, employment, healthcare providers, domestic violence, HIV/AIDS, mental health, substance abuse, Veterans services, youth services, etc.).
3. Facilitating committee meetings and overseeing all committee affairs.
4. Convening ad-hoc subcommittees as needed for time limited tasks.
5. Attending Executive Committee meetings to represent their committee and acting as a go-between to other committees.
6. Developing meeting agendas and ensuring that meeting minutes are recorded and distributed to committee members prior to the next meeting.
7. Maintaining a current membership list and document meeting attendance.
8. Ensuring meetings are held in accordance with the ODFC Operating Guidelines and that committee business and voting is conducted on appropriate matters.

### **Section 3E: Committee Meetings**

1. Committees shall meet at least five (5) times per year.
2. Committees shall adopt their own meeting schedule and inform The ODFC Coordinating Council of meeting dates and times.
3. Each committee member shall be entitled to a single vote.

### **Section 3F: Roles & Duties of Committees**

1. Executive Committee:
  - a. Composition of the Executive Committee will be slated by the Nominating Committee and voted on by members of the Coordinating Council.
  - b. Powers, Duties: Between meetings of the Coordinating Council the Executive Committee may exercise all powers and duties ascribed to the Coordinating Council except the amendment of the Bylaws and shall not act in conflict with actions or policies of the Coordinating Council. The reports of action from all Executive Committee meetings shall be electronically distributed to the

membership of the Coordinating Council within one (1) week of any Executive Committee meeting. Minutes taken by the Executive Committee shall be distributed to the Coordinating Council for confirmation by the Coordinating Council at its next regular meeting.

- c. Meetings: The Executive Committee shall meet not less than five (5) times per year or specially upon call of the Chair, or upon request of 30% of members. Notice of such special meetings shall be given at least 24 hours prior to the meeting. Notice of special meetings may be waived by unanimous consent of members of the Executive Committee noted in the minutes of such meetings. Attendance of any member of the Executive Committee shall constitute a waiver of notice of the meeting.
- d. Electronic Participation: Members of the Executive Committee may participate in a meeting of the Executive Committee by means of a conference telephone or similar communications equipment affording all persons participating in the meeting the ability to hear each other, and participation in the meeting by means of electronic equipment shall constitute presence in person at such meeting. Electronic voting is considered permissible. However, if the electronic or telephonic participation is not possible due to poor communication equipment or connection, the Executive Committee Member may not participate or vote.
- e. Quorum: A quorum shall consist of the presence of not less than fifty- one (51 %) percent of the members of the Executive Committee.

## 2. Role of Health and Housing Stability Committee

- a. Reducing medical vulnerability and frequent use of health care systems.
- b. Supporting the housing stability of vulnerable families, children, and youth.
- c. Breaking the cycle of homelessness and re-incarceration in order to successfully re-integrate ex-offenders and reduce recidivism.
- d. Other responsibilities as determined by the Committee membership.

## 3. Role of Housing Committee

- a. Expand opportunities for rent subsidies.
- b. Stimulate the development of supportive housing and of mixed-income communities.
- c. Embed strategies to prevent and end homelessness within cohesive State and municipal housing policies that set clear outcome targets.
- d. Aggressively leverage and compete for Federal rent subsidies, housing development dollars, and service funding linked to housing.
- e. Other responsibilities as determined by the Committee membership.

## 4. Role of Finance Committee

- a. Review budget and make recommendations to Coordinating Council or Executive Committee.
  - b. Monitor ODFC expenditures and notify the Coordinating Council or Executive Committee of any predicted or actual variance from the annual budget.
  - c. Present mid-year and year end budget to Executive Committee
  - d. Present budget to Coordinating Council once a year which will include year-end summary and an upcoming year recommendation
  - e. Other responsibilities as determined by the Committee membership.
  - f. Review contracts that have been recommended by other committees and make recommendations to Coordinating Council or Executive Committee.
  - g.
5. Role of Crisis Response and Coordinated Access Committee
  - a. Create and implement Universal Application.
  - b. Create and implement a Regional Coordinated Access system.
  - c. Develop a process to prioritize individuals and families for housing resources including but not limited to: Emergency Shelter, PSH and Rapid Rehousing.
  - d. Other responsibilities as determined by the Committee membership.
6. Role of Communications and Advocacy Committee
  - a. Develop and implement communications plans both internally with ODFC and to the general public.
  - b. Other responsibilities as determined by the Committee membership.
7. Role of Standards and Evaluations Committee:
  - a. Committee duties:
    - i. Establish performance targets appropriate for population and program type
    - ii. Establish remedial action protocol for low performing grantees.
    - iii. Establish written standards for providing assistance, as outlined in HUD Interim Rule § 575.7(a)(9). Ensure compliance with HUD standards.
    - iv. Monitor Homeless Management Information System (HMIS) participation and compliance.
    - v. Monitor grantee performance, evaluate outcomes and take action against poor performers, as appropriate.
    - vi. Monitor ESG funded programs and provide performance targets and feedback to appropriate funding entities.
8. Role of Economic Security Committee

- a. Link workforce system resources (skill development, job development) with the housing assistance system to create effective pathways to employment for vulnerable populations.
- b. Align public sector programs to ensure effective systems coordination with shared goals.
- c. Expand income growth for persons with disabilities.
- d. Other responsibilities as determined by the Committee membership.

9. Role of Youth Engagement Team Initiative (YETI)

- a. Engage youth, schools, youth-serving agencies, Local Implementation Service Team (LIST) members, providers, designated CAN representatives, and other stakeholders in the efforts to develop, implement, and evaluate a coordinated community plan to prevent and end youth homelessness by 2020.
- b. Work in collaboration with youth and young adults to refine the existing crisis response system to better engage, assess, serve, and house homeless youth and young adults in each community.
- c. Ensure successful implementation of a regional Youth Count.
- d. Other responsibilities as determined by the Committee membership.

10. Role of Youth Advisory Board

- a. Review, provide feedback, and make recommendations to ODFC on any community applications for new funding opportunities directed at serving and housing homeless or unstably housed youth.
- b. Provide input to ODFC leadership on policies that relate to preventing and ending youth homelessness.
- c. Ensure successful implementation of a regional Youth Count.
- d. Other responsibilities as determined by the Committee membership.

11. Role of Funders' Collaborative

- a. Align funders goals to the goals of ODFC
- b. Bring together the Funding Oversight Subcommittee.
- c. Role of Funding Oversight Subcommittee.
  - i. Provide an impartial, non-conflicted review of the CoC's decision making process and conclusions related to HUD funding applications and priorities.
  - ii. Review the scoring protocol and tool, ranking, and reallocation decisions of the Standards and Evaluation Committee in preparation of the Consolidated NOFA Application to HUD and amend it as benefits the CoC.

- iii. Make final determinations on reallocation of HUD funded projects.
- iv. Serve as final arbiter on other decisions that constitute conflicts of interest for funded agencies.

d.

## **Article IV**

### **Section 1: Consultant Functions**

1. ODFC may contract with various consultants to perform tasks that assist with the administration of ODFC, assist with strategizing on how best to prevent and end homelessness, and to assist with performance evaluation and grant applications.
2. The Coordinating Council shall select any consultants hired by ODFC through its Collaborative Applicant or other fiscal agent and may request the advice of committees as appropriate. Any consultant hired at the behest of ODFC shall be accountable to the Coordinating Council of ODFC.

## **Article V ODFC Regional CoC Code of Conduct**

### **Compliance with Policies**

Members will conduct ODFC business in accordance with the Operating Guidelines of ODFC including conflict of interest and information management policies.

### **Section 1: Code of Conduct**

This ODFC Code of Conduct represents high standards which should be regarded as minimum expectations for conduct. Members will act in accordance with and maintain the highest standards of professional integrity, impartiality, diligence, creativity and productivity. ODFC business will be conducted in a manner that reflects the highest standards in accordance with federal, state, and local laws and regulations.

All members of ODFC shall conduct themselves at all times with the highest ethical standards. Members shall be required to follow the ODFC Code of Conduct.

#### **1. Confidentiality/Professional Conduct**

Members must maintain the highest standards of confidentiality regarding information obtained directly or indirectly through their involvement with ODFC. This includes but is not limited to information about members and their organizations and funded agencies. Members must also avoid inadvertent disclosure of confidential information through casual or public discussion, which may be overheard or misinterpreted.

#### **2. Impartiality**

Member agencies shall act impartially and with integrity.

Members will:

- Not knowingly be a party to or condone any illegal or improper activity.
- Not directly, or indirectly, seek personal gain which would influence, or appear to influence, the conduct of their duties.
- Not exploit ODFC professional relationships for personal or professional gain.
- Be alert to the influences and pressures that interfere with the professional discretion and impartial judgment required for the performance of members.

### **3.Fraud**

- Fraudulent acts will not be tolerated.

### **4. Gifts or honoraria**

- It is not permissible to offer or accept gifts, gratuities, excessive favors or personal rewards intended to influence ODFC decisions or activities.

### **5. Harassment**

- Harassment will not be tolerated.

### **6. Laws and Regulations**

- ODFC business will be conducted in a manner that reflects the highest standards and in accordance with all federal, state, and local laws and regulations.

## **Section 2: Conflict of Interest**

Any member of ODFC who has a financial, personal, or official interest in, or conflict with any matter pending before the committee on which he/she is serving, shall report that potential conflict of interest to the committee. If the conflict is of such nature that it prevents or may prevent that member from acting on the matter in an impartial manner, they will voluntarily excuse him/herself and will refrain from voting on said item.

## **Section 3: Nondiscrimination**

The members, officers, and persons served by the Continuum shall not discriminate against any member of ODFC because of race, color, religious creed, age, marital status, national origin, sex, sexual orientation, familial status, gender identity or gender expression, or disability and will follow all state and federal regulations regarding nondiscrimination.

## **Section 4: Amendments**

These Operating Guidelines may be amended by a 2/3 majority vote at a meeting of the Coordinating Council, with a quorum present, provided that the proposed amendment(s) shall have been submitted in writing to each member at 10 business days before action is taken by the Coordinating Council.





## ODFC Operating Guidelines Appendix: A



APPENDIX: Adopted By Coordinating Council on June 8, 2015

*Excerpted From Notice CPD-14-012: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons*

**Order of Priority in CoC Program-funded Permanent Supportive Housing Beds Dedicated to Persons Experiencing Chronic Homelessness and Permanent Supportive Housing Prioritized for Occupancy by Persons Experiencing Chronic Homelessness**

**(a) First Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.** A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and

- ii. The CoC or CoC Program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs (see Section I.D.3. of this Notice for definition of severe service needs).

**(b) Second Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness.** A chronically homeless individual or head of household, as defined in 24 CFR 578.3, for which both of the following are true:

- i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,

- ii. The CoC or CoC program recipient has **not** identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

**(c) Third Priority—Chronically Homeless Individuals and Families with the Most Severe Service Needs.** A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- i. The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than one year; and

ii. The CoC or CoC program recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

**(d) Fourth Priority—All Other Chronically Homeless Individuals and Families.** A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

- i. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length the four occasions is **less than** 12 months; and
- ii. The CoC or CoC program recipient has **not** identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

**DEFINITIONS OF KEY TERMS:**

**Chronically Homeless.** The definition of "chronically homeless" currently in effect for the CoC Program is that which is defined in the CoC Program interim rule at 24 CFR 578.3, which states that a chronically homeless person is:

**(a)** An individual who:

- i. Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- ii. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years; and
- iii. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;

**(b)** An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition [as described in Section I.D.2.(a) of this Notice], before entering that facility; or

**(c)** A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition [as described in Section I.D.2.(a) of this Notice, including a family whose composition has fluctuated while the head of household has been homeless.

**3. Severity of Service Needs.** This Notice refers to persons who have been identified as having the most severe service needs.

**(a)** For the purposes of this Notice, this means an individual for whom at least one of the following is true:

i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; or

ii. Significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing.

Severe service needs as defined in paragraphs i. and ii. above should be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool that can identify the severity of needs such as the Vulnerability Index (VI), the Service Prioritization Decision Assistance Tool (SPDAT), or the Frequent Users Service Enhancement (FUSE). The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual.

**(b)** In states where there is an alternate criteria used by state Medicaid departments to identify high-need, high cost beneficiaries, CoCs and recipients of CoC Program-funded PSH may use similar criteria to determine if a household has severe service needs instead of the criteria defined paragraphs i. and ii. above. However, such determination must not be based on a specific diagnosis or disability type.

Adopted by ODFC Coordinating Council on June 8, 2015

### CT 503 Housing First Principles

Approved by ODFC Interim Coordinating Council 2015.6.8

Housing First is a programmatic and systems approach that centers on providing homeless people with housing quickly and *then* providing services as needed using a low barrier approach that emphasizes community integration, stable tenancy, recovery and individual choice.

#### Low barrier approach to entry:

- Housing First offers individuals and families experiencing homelessness immediate access to permanent supportive housing without unnecessary prerequisites. For example:
  - a. Admission/tenant screening and selection practices do not require abstinence from substances, completion of or compliance with treatment, or participation in services.
  - b. Applicants are not rejected on the basis of poor or lack of credit or income, poor or lack of rental history, minor criminal convictions, or other factors that might indicate a lack of “housing readiness.”
  - c. Blanket exclusionary criteria based on more serious criminal convictions are not applied, though programs may consider such convictions on a case by case basis as necessary to ensure the safety of other residents and staff.
  - d. Generally, only those admission criteria that are required by funders are applied, though programs may also consider additional criteria on a case by case basis as necessary to ensure the safety of tenants and staff. Application of such additional criteria should be rare, and may include, for example, denial of an applicant who is a high risk registered sex offender by a project serving children, or denial of an applicant who has a history of domestic violence involving a current participant.

#### Community integration and recovery:

- Housing is integrated into the community and tenants have ample opportunity and are supported to form connections outside of the project.
  - a. Housing is located in neighborhoods that are accessible to community resources and services such as schools, libraries, houses of worship, grocery stores, laundromats, doctors, dentists, parks, and other recreation facilities.
  - b. Efforts are made to make the housing look and feel similar to other types of housing in the community and to avoid distinguishing the housing as a program that serves people with special needs.
  - c. Services are designed to help tenants build supportive relationships, engage in personally meaningful activities, and regain or develop new roles in their families and communities.
  - d. Services are recovery-based and designed to help tenants gain control of their own lives, define their personal values, preferences, and visions for the future, establish meaningful individual short and long-term goals, and build hope that the things they want out of life are attainable. Services are focused on helping tenants achieve the things that are important to them and goals are not driven by staff priorities or selected from a pre-determined menu of options.

#### Lease compliance and housing retention

- Tenants are expected to comply with a standard lease agreement and are provided with services and supports to help maintain housing and prevent eviction.
  - a. Leases do not include stipulations beyond those that are customary, legal, and enforceable under Connecticut law.
  - b. No program rules beyond those that are customary, legal, and enforceable through a lease are applied (e.g., visitor policies should be equivalent to those in other types of permanent, lease-based housing in the community).
  - c. Services are designed to identify and reduce risks to stable tenancy and to overall health and well-being.
- Retention in housing is contingent only on lease compliance and is not contingent on abstinence from substances or compliance with services, treatment or other clinical requirements. For example:
  - a. Tenants are not terminated involuntarily from housing for refusal to participate in services or for violating program rules that are not stipulated in the lease.
  - b. Transitional housing programs offer participants due process to resolve issues that may result in involuntary discharge (unless immediate risk to health and safety)
  - c. PH providers only terminate occupancy of housing in cases of noncompliance with the lease or failure of a tenant to carry out obligations under Connecticut's Landlord and Tenant Act (Chapter 830 of the Connecticut General Statute <http://www.cga.ct.gov/2011/pub/chap830.htm>).
  - d. In order to terminate housing, PH providers are required to use the legal court eviction process.

#### Separation of housing and services

- Projects are designed in such a manner that the roles of property management (e.g., housing application, rent collection, repairs, and eviction) and supportive services staff are clearly defined and distinct.
  - a. Property management and support service functions are provided either by separate legal entities or by staff members whose roles do not overlap.
  - b. There are defined processes for communication and coordination across the two functions to support stable tenancy.
  - c. Those processes are designed to protect client confidentiality and share confidential information on a need to know basis only.

#### Tenant Choice

- Efforts are made to maximize tenant choice, including type, frequency, timing, location and intensity of services and whenever possible choice of neighborhoods, apartments, furniture, and décor.
- Staff accepts tenant choices as a matter of fact without judgment and provides services that are non-coercive to help people achieve their personal goals.
- Staff accepts that risk is part of the human experience and helps tenants to understand risks and reduce harm caused to themselves and others by risky behavior.

- Staff understands the clinical and legal limits to choice and intervenes as necessary when someone presents a danger to self or others.
- Staff helps tenants to understand the legal obligations of tenancy and to reduce risk of eviction.
- Projects provide meaningful opportunities for tenant input and involvement when designing programs, planning activities and determining policies.