

## Before Starting the CoC Application

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

The Collaborative Applicant is responsible for:

- Reviewing the FY 2015 CoC Program Competition NOFA in its entirety for specific application and program requirements.
- Using the CoC Application Detailed Instructions for assistance with completing the application in e-snaps.
- Answering all questions in the CoC Application. It is the responsibility of the Collaborative Applicant to ensure that all imported and new responses in all parts of the application are fully reviewed and completed. When doing so, please keep in mind that:
  - This year, CoCs will see that a few responses have been imported from the FY 2013/FY 2014 CoC Application. Due to significant changes to the CoC Application questions, most of the responses from the FY 2013/FY 2014 CoC Application could not be imported.
    - For some questions, HUD has provided documents to assist Collaborative Applicants in filling out responses.
    - For other questions, the Collaborative Applicant must be aware of responses provided by project applicants in their Project Applications.
  - Some questions require that the Collaborative Applicant attach a document to receive credit. This will be identified in the question.
  - All questions marked with an asterisk (\*) are mandatory and must be completed in order to submit the CoC Application.

For Detailed Instructions click [here](#).

## 1A. Continuum of Care (CoC) Identification

### **Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**1A-1. CoC Name and Number:** PA-500 - Philadelphia CoC

**1A-2. Collaborative Applicant Name:** City of Philadelphia

**1A-3. CoC Designation:** CA

**1A-4. HMIS Lead:** City of Philadelphia

## 1B. Continuum of Care (CoC) Engagement

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**1B-1. From the list below, select those organizations and persons that participate in CoC meetings. Then select "Yes" or "No" to indicate if CoC meeting participants are voting members or if they sit on the CoC Board. Only select "Not Applicable" if the organization or person does not exist in the CoC's geographic area.**

Organization/Person Categories	Participates in CoC Meetings	Votes, including electing CoC Board	Sits on CoC Board
Local Government Staff/Officials	Yes	Yes	Yes
CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes	Yes
Law Enforcement	Yes	No	No
Local Jail(s)	No	No	No
Hospital(s)	Yes	Yes	Yes
EMT/Crisis Response Team(s)	Yes	Yes	Yes
Mental Health Service Organizations	Yes	Yes	Yes
Substance Abuse Service Organizations	Yes	Yes	Yes
Affordable Housing Developer(s)	Yes	Yes	Yes
Public Housing Authorities	Yes	Yes	Yes
CoC Funded Youth Homeless Organizations	Yes	No	No
Non-CoC Funded Youth Homeless Organizations	Yes	Yes	Yes
School Administrators/Homeless Liaisons	Yes	No	No
CoC Funded Victim Service Providers	Yes	No	No
Non-CoC Funded Victim Service Providers	Yes	No	No
Street Outreach Team(s)	Yes	No	No
Youth advocates	Yes	Yes	Yes
Agencies that serve survivors of human trafficking	Yes	Yes	Yes
Other homeless subpopulation advocates	Yes	Yes	Yes
Homeless or Formerly Homeless Persons	Yes	Yes	Yes
None	Not Applicable	Not Applicable	Not Applicable
None	Not Applicable	Not Applicable	Not Applicable
None	Not Applicable	Not Applicable	Not Applicable

**1B-1a. Describe in detail how the CoC solicits and considers the full range of opinions from individuals or organizations with knowledge of homelessness in the geographic area or an interest in preventing and ending homelessness in the geographic area. Please provide two examples of organizations or individuals from the list in 1B-1 to answer this question. (limit 1000 characters)**

Any stakeholder interested in the goals of the CoC can join the CoC. CoC Board has 5 govt. agencies, 4 nonprofit homeless service providers, 4 persons who previously experienced homelessness, and 2 community stakeholders. 1 Board member represents a local foundation that fully supports the CoC application efforts, and is committed to a community-wide planning process to prevent and end homelessness that engages additional stakeholders in subcommittees. CoC Board approved motion to support community-wide planning effort with 2015 Planning Grant funds. 1 Board member who previously experienced homelessness requested the detailed methods for monitoring CoC funded projects to ensure projects work effectively with individuals, specifically to fully obtain and retain mainstream benefits. OSH described for CoC Board the CoC Quality Improvement and Evaluation Subcommittee evaluation process, which includes site visits and interviews with participants for projects where quality is a concern.

**1B-1b. List Runaway and Homeless Youth (RHY)-funded and other youth homeless assistance providers (CoC Program and non-CoC Program funded) who operate within the CoC's geographic area. Then select "Yes" or "No" to indicate if each provider is a voting member or sits on the CoC Board.**

Youth Service Provider (up to 10)	RHY Funded?	Participated as a Voting Member in at least two CoC Meetings within the last 12 months (between October 1, 2014 and November 15, 2015).	Sat on the CoC Board as active member or official at any point during the last 12 months (between October 1, 2014 and November 15, 2015).
Youth Services, Inc.	Yes	No	No
Covenant House PA	No	Yes	Yes
Pathways PA	Yes	No	No
The Attic	No	No	No
Valley Youth House	Yes	No	No
People for People, Inc.	Yes	No	No
None	No	No	No
None	No	No	No
None	No	No	No
None	No	No	No

**1B-1c. List the victim service providers (CoC Program and non-CoC Program funded) who operate within the CoC's geographic area. Then select "Yes" or "No" to indicate if each provider is a voting member or sits on the CoC Board.**

Victim Service Provider for Survivors of Domestic Violence (up to 10)	Participated as a Voting Member in at least two CoC Meetings within the last 12 months (between October 1, 2014 and November 15, 2015).	Sat on CoC Board as active member or official at any point during the last 12 months (between October 1, 2014 and November 15, 2015).
Women Against Abuse	No	No
Dawn's Place	No	No
Congreso de Latinos Unidos, Inc.	No	No
Lutheran Settlement House	No	No
Women In Transition	No	No
Salvation Army	No	No
None	No	No
None	No	No
None	No	No
None	No	No

**1B-2. Does the CoC intend to meet the timelines for ending homelessness as defined in Opening Doors?**

Opening Doors Goal	CoC has established timeline?
End Veteran Homelessness by 2015	Yes
End Chronic Homelessness by 2017	Yes
End Family and Youth Homelessness by 2020	No
Set a Path to End All Homelessness by 2020	No

**1B-3. How does the CoC identify and assign the individuals, committees, or organizations responsible for overseeing implementation of specific strategies to prevent and end homelessness in order to meet the goals of Opening Doors?  
(limit 1000 characters)**

The Philadelphia CoC involves over 250 individuals and organizations who participate in ending homelessness, including: 1) PhillyVetsHome2015, which was structured under the 25 Cities/Rapid Results bootcamp in 2013 and uses a collective impact strategy to house 1330 veterans, reaching functional zero in 2015 through the work of a Leadership Team (PHA, VA, CoC, HUD, Mayor's Office, USICH) and a Housing Team (6 non-profit providers, VA, PHA, CoC, SSVF and GPD grantees). 2) The City's Dept of Behavioral Health, OSH, and outreach teams, with HUD and PHA, focus on ending chronic homelessness using a priority by-name list. 3) There are multiple committees focused on families, children, individuals experiencing chronic homelessness and youth. In November 2015, the CoC Board adopted a motion to develop a broad process and inclusive structure to plan to end family, youth, and all homelessness with the model used for veterans.

**1B-4. Explain how the CoC is open to proposals from entities that have not previously received funds in prior CoC Program competitions, even if the CoC is not applying for any new projects in 2015. (limit 1000 characters)**

When an organization not previously known to the CoC expresses an interest in applying for funds, contact information is recorded in a database for notification of Requests for Proposals (RFP), and RFPs are publicly available on City's website. Providers are invited to a RFP briefing session for overview of the HUD CoC, funding process, CoC housing priorities, and the scoring and ranking process for new projects. If a provider has limited/no previous experience, the CA recommends the agency partner with an experienced agency so the application for funding is competitive. The CA provides written feedback/denial and offers individualized face-to-face debrief to any applicant whose project is not recommended for funding. CoC membership is not a requirement for participation in either the renewal or the new competitive processes.

**1B-5. How often does the CoC invite new members to join the CoC through a publicly available invitation?**      Annually

## 1C. Continuum of Care (CoC) Coordination

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**1C-1. Does the CoC coordinate with other Federal, State, local, private and other entities serving homeless individuals and families and those at risk of homelessness in the planning, operation and funding of projects? Only select "Not Applicable" if the funding source does not exist within the CoC's geographic area.**

Funding or Program Source	Coordinates with Planning, Operation and Funding of Projects
Housing Opportunities for Persons with AIDS (HOPWA)	Yes
Temporary Assistance for Needy Families (TANF)	Yes
Runaway and Homeless Youth (RHY)	Yes
HeadStart Program	Yes
Other housing and service programs funded through Federal, State and local government resources.	Yes

**1C-2. The McKinney-Vento Act, as amended, requires CoCs to participate in the Consolidated Plan(s) (Con Plan(s)) for the geographic area served by the CoC. The CoC Program interim rule at 24 CFR 578.7(c)(4) requires that the CoC provide information required to complete the Con Plan(s) within the CoC's geographic area, and 24 CFR 91.100(a)(2)(i) and 24 CFR 91.110(b)(1) requires that the State and local Con Plan jurisdiction(s) consult with the CoC. The following chart asks for information about CoC and Con Plan jurisdiction coordination, as well as CoC and ESG recipient coordination.**

CoCs can use the CoCs and Consolidated Plan Jurisdiction Crosswalk to assist in answering this question.

	Number	Percentage
Number of Con Plan jurisdictions with whom the CoC geography overlaps	1	
How many Con Plan jurisdictions did the CoC participate with in their Con Plan development process?	1	100.00 %
How many Con Plan jurisdictions did the CoC provide with Con Plan jurisdiction level PIT data?	1	100.00 %
How many of the Con Plan jurisdictions are also ESG recipients?	1	
How many ESG recipients did the CoC participate with to make ESG funding decisions?	1	100.00 %

How many ESG recipients did the CoC consult with in the development of ESG performance standards and evaluation process for ESG funded activities?	1	100.00 %
--	---	----------

**1C-2a. Based on the responses selected in 1C-2, describe in greater detail how the CoC participates with the Consolidated Plan jurisdiction(s) located in the CoC's geographic area and include the frequency, extent, and type of interactions between the CoC and the Consolidated Plan jurisdiction(s). (limit 1000 characters)**

The City of Philadelphia's Office of Housing & Community Development (OHCD) is the City's applicant for HOME, CDBG, HOPWA, & ESG funding and prepares the Con Plan; the Office of Supportive Housing (OSH) is the CoC Collaborative Applicant and administers ESG funding. OHCD and OSH staff interact at least monthly through the following activities: OHCD is represented on the CoC Board and Advisory Committee. OHCD and OSH have MOUs for Housing Trust Fund, ESG, and HOME/CDBG. OSH contributes information and participates in public hearings and City Council deliberations related to the Con Plan. OHCD and OSH jointly develop and issue Requests for Proposals for Affordable Housing Development to serve individuals/families who are homeless/have special needs, and jointly review proposals for funding.

**1C-2b. Based on the responses selected in 1C-2, describe how the CoC is working with ESG recipients to determine local ESG funding decisions and how the CoC assists in the development of performance standards and evaluation of outcomes for ESG-funded activities. (limit 1000 characters)**

OSH, the CoC Collaborative Applicant, also administers ESG funding through contracts with subrecipients. ESG recipients are represented on the CoC Advisory Committee and Board, and the annual ESG spending plan is presented for approval to the Advisory Committee and Board. OSH oversees the coordination of CoC and ESG resources using PIT, HMIS, and unmet need estimates to best meet the needs of individuals and families experiencing homelessness in Philadelphia. OSH monitors performance of ESG subrecipients of both Rapid Rehousing and Emergency Shelter activities. OSH was designated by the CoC Board to lead the planning process to strengthen Coordinated Entry. Over the past year, ESG recipients have been involved in Coordinated Entry community planning processes, including the CoC's updated written standards/policies and procedures for evaluating eligibility for assistance and determining and prioritizing individuals for type of assistance.

**1C-3. Describe the how the CoC coordinates with victim service providers and non-victim service providers (CoC Program funded and non-CoC funded) to ensure that survivors of domestic violence are provided housing and services that provide and maintain safety and security. Responses must address how the service providers ensure and maintain the safety and security of participants and how client choice is upheld. (limit 1000 characters)**



CoC collaborates with victim service providers to ensure safety and confidentiality. Women Against Abuse (WAA) staff perform confidential risk and severity of abuse assessment at OSH's family/single female shelter intake site and admit clients to the 200 WAA-operated beds designated for victims of domestic violence. A city-funded collaboration between Congreso, Women in Transition, and Lutheran Settlement ensures hard to reach pops. (LGBTQ, Latina, men) and victims in general shelter population can access confidential services and supports, including emergency hotel options. WAA has access to City's housing resources: transitional housing, rapid re-housing, and PHA housing. To protect confidentiality, housing applications are submitted through secure website, physical address is not listed, access to records is limited, and client consent is required to share info with housing provider. Clients may decline up to 3 housing options & re-apply to begin the process again if desired.

**1C-4. List each of the Public Housing Agencies (PHAs) within the CoC's geographic area. If there are more than 5 PHAs within the CoC's geographic area, list the 5 largest PHAs. For each PHA, provide the percentage of new admissions that were homeless at the time of admission between October 1, 2014 and March 31, 2015, and indicate whether the PHA has a homeless admissions preference in its Public Housing and/or Housing Choice Voucher (HCV) program. (Full credit consideration may be given for the relevant excerpt from the PHA's administrative planning document(s) clearly showing the PHA's homeless preference, e.g. Administration Plan, Admissions and Continued Occupancy Policy (ACOP), Annual Plan, or 5-Year Plan, as appropriate).**

Public Housing Agency Name	% New Admissions into Public Housing and Housing Choice Voucher Program from 10/1/14 to 3/31/15 who were homeless at entry	PHA has General or Limited Homeless Preference
Philadelphia Housing Authority	46.70%	Yes-Both

**If you select "Yes--Public Housing," "Yes--HCV," or "Yes--Both" for "PHA has general or limited homeless preference," you must attach documentation of the preference from the PHA in order to receive credit.**

**1C-5. Other than CoC, ESG, Housing Choice Voucher Programs and Public Housing, describe other subsidized or low-income housing opportunities that exist within the CoC that target persons experiencing homelessness. (limit 1000 characters)**

Since 2012, the City has operated a Permanent Supportive Housing Clearinghouse to facilitate access to affordable housing for individuals and families who are homeless and/or have special needs. In addition to nearly 600 CoC units and PHA conventional/HCV units (at least 500 committed annually), the Clearinghouse serves as the state-designated Local Lead Agency for Philadelphia for developers participating in the Low Income Housing Tax Credit Program, and will administer Section 811. All City-supported affordable rental housing projects with more than 20 units must Set-Aside 10% of the units for households that are homeless with special needs, and the Clearinghouse refers to set-aside units committed under HUD’s Multifamily Initiative to End Homelessness. A total of 1743 units is managed through this centralized and automatated referral system.

**1C-6. Select the specific strategies implemented by the CoC to ensure that homelessness is not criminalized in the CoC's geographic area. Select all that apply. For "Other," you must provide a description (2000 character limit)**

<b>Engaged/educated local policymakers:</b>	<input type="checkbox"/>
<b>Engaged/educated law enforcement:</b>	<input checked="" type="checkbox"/>
<b>Implemented communitywide plans:</b>	<input type="checkbox"/>
<b>No strategies have been implemented:</b>	<input type="checkbox"/>
Enforce Local Ordinance (Sidewalk Behavior Ordinance): The primary protection against criminalization of individuals experiencing homelessness in Philadelphia is the 1999 Sidewalk Behavior Ordinance, whose final version and City Council passage were influenced heavily by advocates for homeless individuals. The ordinance requires that prior to taking any legal action against an individual outdoors, police must first attempt to connect the individual with services via outreach. Ongoing collaboration with law enforcement officials and representatives concerned with the impact of homelessness on tourism and hospitality industries, especially in Center City, occurs monthly through the “Combined Outreach” meeting, where CoC, Business Improvement District, tourism, and street outreach representatives convene to openly address concerns, issues, trends, and events that require collaboration and coordination.	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>

## 1D. Continuum of Care (CoC) Discharge Planning

### Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**1D-1. Select the systems of care within the CoC's geographic area for which there is a discharge policy in place that is mandated by the State, the CoC, or another entity for the following institutions? Check all that apply.**

Foster Care:	<input checked="" type="checkbox"/>
Health Care:	<input checked="" type="checkbox"/>
Mental Health Care:	<input checked="" type="checkbox"/>
Correctional Facilities	<input checked="" type="checkbox"/>
None:	<input type="checkbox"/>

**1D-2. Select the systems of care within the CoC's geographic area with which the CoC actively coordinates to ensure that institutionalized persons that have resided in each system of care for longer than 90 days are not discharged into homelessness. Check all that apply.**

Foster Care:	<input checked="" type="checkbox"/>
Health Care:	<input checked="" type="checkbox"/>
Mental Health Care:	<input checked="" type="checkbox"/>
Correctional Facilities:	<input type="checkbox"/>
None:	<input type="checkbox"/>

**1D-2a. If the applicant did not check all boxes in 1D-2, explain why there is no coordination with the institution(s) and explain how the CoC plans to coordinate with the institution(s) to ensure persons discharged are not discharged into homelessness.  
(limit 1000 characters)**

Coordination with correctional facilities has been sporadic due to number of state/local institutions all with different protocols; developing a systemic strategy to prevent discharges into homelessness requires consistent focus. CoC began a process to improve coordination with Department of Behavioral Health & Criminal Justice Advisory Board (committee of top-level criminal justice and public health officials), including a CSH FUSE TA application. CoC responds to numerous requests for housing assistance pre-release; of >30,000 discharges annually, nearly 1000 persons enter emergency shelter, with just over half (554) coming within 90 days of leaving jail. Small efforts include a master-leasing project for individuals with behavioral health diagnoses exiting state correctional facilities, and SOAR assistance for individuals homeless at re-entry. CoC will develop a coordinated systemic response, increasing collaboration between system partners, and reviewing discharge planning policies.

## 1E. Centralized or Coordinated Assessment (Coordinated Entry)

### Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**CoCs are required by the CoC Program interim rule to establish a Centralized or Coordinated Assessment system – also referred to as Coordinated Entry. Based on the recent Coordinated Entry Policy Brief, HUD’s primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that it be easily accessible regardless of where or how people present for assistance. Most communities lack the resources needed to meet all of the needs of people experiencing homelessness. This combined with the lack of a well-developed coordinated entry processes can result in severe hardships for persons experiencing homelessness who often face long wait times to receive assistance or are screened out of needed assistance. Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. Coordinated entry processes also provide information about service needs and gaps to help communities plan their assistance and identify needed resources.**

**1E-1. Explain how the CoC’s coordinated entry process is designed to identify, engage, and assist homeless individuals and families that will ensure those who request or need assistance are connected to proper housing and services.  
(limit 1000 characters)**

For over 20 years the Office of Supportive Housing has operated a centralized intake system for City-funded shelters that covers all of Philadelphia & is accessible 24hrs/day, 365 days/yr. Information is available via the City website & 311 & 211 phone systems. The purpose of shelter intake is to assess immediate housing need, divert when possible, but provide bed if available. Once in shelter a fuller assessment is completed & Clearinghouse applications are initiated as appropriate: for RRH, TH, PHA, or PSH. With help from HUD TA providers, the CoC is revisiting existing intake practices & developing a system with the following goals: utilize common assessment tool to determine appropriate type of assistance; combine separate Clearinghouses & processes into one; phase all CoC and ESG funded projects into the one Clearinghouse; obtain commitment of all projects to accept referrals from coordinated entry system; & track & monitor results of reducing length of time homeless & recidivism.

**1E-2. CoC Program and ESG Program funded projects are required to participate in the coordinated entry process, but there are many other organizations and individuals who may participate but are not required to do so. From the following list, for each type of organization or individual, select all of the applicable checkboxes that indicate how that organization or individual participates in the CoC's coordinated entry process. If the organization or person does not exist in the CoC's geographic area, select "Not Applicable." If there are other organizations or persons that participate not on this list, enter the information, click "Save" at the bottom of the screen, and then select the applicable checkboxes.**

Organization/Person Categories	Participates in Ongoing Planning and Evaluation	Makes Referrals to the Coordinated Entry Process	Receives Referrals from the Coordinated Entry Process	Operates Access Point for Coordinated Entry Process	Participates in Case Conferencing	Not Applicable
Local Government Staff/Officials	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
CDBG/HOME/Entitlement Jurisdiction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Law Enforcement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Local Jail(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hospital(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EMT/Crisis Response Team(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Mental Health Service Organizations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Substance Abuse Service Organizations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Affordable Housing Developer(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Housing Authorities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-CoC Funded Youth Homeless Organizations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
School Administrators/Homeless Liaisons	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Non-CoC Funded Victim Service Organizations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Street Outreach Team(s)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homeless or Formerly Homeless Persons	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## 1F. Continuum of Care (CoC) Project Review, Ranking, and Selection

### Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

### 1F-1. For all renewal project applications submitted in the FY 2015 CoC Program Competition complete the chart below regarding the CoC's review of the Annual Performance Report(s).

How many renewal project applications were submitted in the FY 2015 CoC Program Competition?	101
How many of the renewal project applications are first time renewals for which the first operating year has not expired yet?	4
How many renewal project application APRs were reviewed by the CoC as part of the local CoC competition project review, ranking, and selection process for the FY 2015 CoC Program Competition?	96
Percentage of APRs submitted by renewing projects within the CoC that were reviewed by the CoC in the 2015 CoC Competition?	98.97%

### 1F-2. In the sections below, check the appropriate box(s) for each section to indicate how project applications were reviewed and ranked for the FY 2015 CoC Program Competition. (Written documentation of the CoC's publicly announced Rating and Review procedure must be attached.)

Type of Project or Program (PH, TH, HMIS, SSO, RRH, etc.)	<input checked="" type="checkbox"/>
Performance outcomes from APR reports/HMIS	
Length of stay	<input type="checkbox"/>
% permanent housing exit destinations	<input checked="" type="checkbox"/>
% increases in income	<input checked="" type="checkbox"/>
	<input type="checkbox"/>



<b>Monitoring criteria</b>	
Participant Eligibility	<input checked="" type="checkbox"/>
Utilization rates	<input checked="" type="checkbox"/>
Drawdown rates	<input type="checkbox"/>
Frequency or Amount of Funds Recaptured by HUD	<input checked="" type="checkbox"/>
	<input type="checkbox"/>

<b>Need for specialized population services</b>	
Youth	<input checked="" type="checkbox"/>
Victims of Domestic Violence	<input checked="" type="checkbox"/>
Families with Children	<input checked="" type="checkbox"/>
Persons Experiencing Chronic Homelessness	<input checked="" type="checkbox"/>
Veterans	<input checked="" type="checkbox"/>
	<input type="checkbox"/>

<b>None</b>	<input type="checkbox"/>
-------------	--------------------------

**1F-2a. Describe how the CoC considered the severity of needs and vulnerabilities of participants that are, or will be, served by the project applications when determining project application priority. (limit 1000 characters)**

In the local renewal competition, grantees were scored on response to questions regarding the project’s status in adopting a Housing First approach, including narrative explanations; residence prior to entry (with more points if majority of participants come from literal homelessness); the number of beds dedicated/prioritized for individuals experiencing chronic homelessness; bonus points for serving chronically homeless individuals and families, youth, veterans, and/or those experiencing domestic violence; and evidence that the project seeks to serve those who are the longest time homeless and/or require the most intensive services.

**1F-3. Describe how the CoC made the local competition review, ranking, and selection criteria publicly available, and identify the public medium(s) used and the date(s) of posting. In addition, describe how the CoC made this information available to all stakeholders. (Evidence of the public posting must be attached)  
(limit 750 characters)**

The Office of Supportive Housing has a website that affords us an opportunity to post the local competition review, ranking, and selection criteria so that the public, private, and our stakeholders can review. The information will be posted no later than Wednesday, November 18th, 2015. We made this information available to all stakeholders through our CoC Advisory Board Meeting.

**1F-4. On what date did the CoC and Collaborative Applicant publicly post all parts of the FY 2015 CoC Consolidated Application that included the final project application ranking? (Written documentation of the public posting, with the date of the posting clearly visible, must be attached. In addition, evidence of communicating decisions to the CoC's full membership must be attached.)** 11/18/2015

**1F-5. Did the CoC use the reallocation process in the FY 2015 CoC Program Competition to reduce or reject projects for the creation of new projects? (If the CoC utilized the reallocation process, evidence of the public posting of the reallocation process must be attached.)** Yes

**1F-5a. If the CoC rejected project application(s) on what date did the CoC and Collaborative Applicant notify those project applicants their project application was rejected in the local CoC competition process? (If project applications were rejected, a copy of the written notification to each project applicant must be attached.)** 11/05/2015

**1F-6. Is the Annual Renewal Demand (ARD) in the CoC's FY 2015 CoC Priority Listing equal to or less than the ARD on the final HUD-approved FY 2015 GIW?** Yes

# 1G. Continuum of Care (CoC) Addressing Project Capacity

## Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

### 1G-1. Describe how the CoC monitors the performance of CoC Program recipients. (limit 1000 characters)

The CoC monitors the performance of CoC program recipients in its annual local renewal competition. CoC renewal project scores are largely based on the project's performance as reported in the most recently submitted APR, including: utilization, eligibility, housing stability, attainment of income, and access to mainstream benefits. In addition, projects must report the funds expended/returned to HUD in the previous operating year, submit all HUD monitoring findings and status on resolution. The CoC now reviews every APR prior to submission to HUD and provides technical assistance, if needed. APR submission dates are closely monitored. The 35 CoC projects under direct contract with the Office of Supportive Housing undergo an additional monitoring review annually to ensure each project is meeting all funding and performance requirements. Any project that is identified as a low-performer receives extensive technical assistance throughout the year.

**1G-2. Did the Collaborative Applicant review and confirm that all project applicants attached accurately completed and current dated form HUD 50070 and form HUD-2880 to the Project Applicant Profile in e-snaps?** Yes

**1G-3. Did the Collaborative Applicant include accurately completed and appropriately signed form HUD-2991(s) for all project applications submitted on the CoC Priority Listing?** Yes

## **2A. Homeless Management Information System (HMIS) Implementation**

**Intructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2A-1. Does the CoC have a governance charter that outlines the roles and responsibilities of the CoC and the HMIS Lead, either within the charter itself or by reference to a separate document like an MOU? In all cases, the CoC's governance charter must be attached to receive credit. In addition, if applicable, any separate document, like an MOU, must also be attached to receive credit.** Yes

**2A-1a. Include the page number where the roles and responsibilities of the CoC and HMIS Lead can be found in the attached document referenced in 2A-1. In addition, in the textbox indicate if the page number applies to the CoC's attached governance charter or the attached MOU.** Pages 1 & 2 of HMIS Governance Charter

**2A-2. Does the CoC have a HMIS Policies and Procedures Manual? If yes, in order to receive credit the HMIS Policies and Procedures Manual must be attached to the CoC Application.** Yes

**2A-3. Are there agreements in place that outline roles and responsibilities between the HMIS Lead and the Contributing HMIS Organizations (CHOs)?** Yes

**2A-4. What is the name of the HMIS software used by the CoC (e.g., ABC Software)?** ClientTrack™  
**Applicant will enter the HMIS software name (e.g., ABC Software).**

**2A-5. What is the name of the HMIS software vendor (e.g., ABC Systems)?** ClientTrack, Inc.  
**Applicant will enter the name of the vendor (e.g., ABC Systems).**

## 2B. Homeless Management Information System (HMIS) Funding Sources

### Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2B-1. Select the HMIS implementation coverage area:** Single CoC

**\* 2B-2. In the charts below, enter the amount of funding from each funding source that contributes to the total HMIS budget for the CoC.**

### 2B-2.1 Funding Type: Federal - HUD

Funding Source	Funding
CoC	\$235,425
ESG	\$149,855
CDBG	\$0
HOME	\$0
HOPWA	\$0
<b>Federal - HUD - Total Amount</b>	<b>\$385,280</b>

### 2B-2.2 Funding Type: Other Federal

Funding Source	Funding
Department of Education	\$0
Department of Health and Human Services	\$0
Department of Labor	\$0
Department of Agriculture	\$0
Department of Veterans Affairs	\$0
Other Federal	\$0
<b>Other Federal - Total Amount</b>	<b>\$0</b>

**2B-2.3 Funding Type: State and Local**

<b>Funding Source</b>	<b>Funding</b>
City	\$499,913
County	\$0
State	\$0
<b>State and Local - Total Amount</b>	<b>\$499,913</b>

**2B-2.4 Funding Type: Private**

<b>Funding Source</b>	<b>Funding</b>
Individual	\$0
Organization	\$0
<b>Private - Total Amount</b>	<b>\$0</b>

**2B-2.5 Funding Type: Other**

<b>Funding Source</b>	<b>Funding</b>
Participation Fees	\$0
<b>Other - Total Amount</b>	<b>\$0</b>

<b>2B-2.6 Total Budget for Operating Year</b>	<b>\$885,193</b>
---	------------------



## 2C. Homeless Management Information System (HMIS) Bed Coverage

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2C-1. Enter the date the CoC submitted the 2015 HIC data in HDX, (mm/dd/yyyy):** 05/15/2015

**2C-2. Per the 2015 Housing Inventory Count (HIC) indicate the number of beds in the 2015 HIC and in HMIS for each project type within the CoC. If a particular housing type does not exist in the CoC then enter "0" for all cells in that housing type.**

Project Type	Total Beds in 2015 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter beds	3,666	200	2,762	79.69%
Safe Haven (SH) beds	115	0	70	60.87%
Transitional Housing (TH) beds	1,956	97	1,663	89.46%
Rapid Re-Housing (RRH) beds	931	0	931	100.00%
Permanent Supportive Housing (PSH) beds	4,908	0	4,239	86.37%
Other Permanent Housing (OPH) beds	900	0	900	100.00%

**2C-2a. If the bed coverage rate for any housing type is 85% or below, describe how the CoC plans to increase this percentage over the next 12 months. (limit 1000 characters)**

The HMIS bed coverage rate for Emergency Shelter beds is 79.69%. As the CoC's new HMIS is implemented in early 2016, the CoC will re-start conversations with the shelter providers, including a large single male Rescue Mission, Covenant House PA Youth Shelter, and the VA (DOM and HCHV/EH programs) to encourage HMIS participation. The low bed coverage rate for Safe Havens (60.87%) is due to a 45 bed Safe Haven program funded through the Veterans Administration in 2012. This data is expected to come into HMIS with the PATH-funded programs in Spring 2016.

**2C-3. HUD understands that certain projects are either not required to or discouraged from participating in HMIS, and CoCs cannot require this if they are not funded through the CoC or ESG programs. This does NOT include domestic violence providers that are prohibited from entering client data in HMIS. If any of the project types listed in question 2C-2 above has a coverage rate of 85% or below, and some or all of these rates can be attributed to beds covered by one of the following programs types, please indicate that here by selecting all that apply from the list below.  
 (limit 1000 characters)**

VA Domiciliary (VA DOM):	<input checked="" type="checkbox"/>
VA Grant per diem (VA GPD):	<input type="checkbox"/>
Faith-Based projects/Rescue mission:	<input checked="" type="checkbox"/>
Youth focused projects:	<input checked="" type="checkbox"/>
HOPWA projects:	<input type="checkbox"/>
Not Applicable:	<input type="checkbox"/>

**2C-4. How often does the CoC review or assess its HMIS bed coverage?** Semi-Annually

## 2D. Homeless Management Information System (HMIS) Data Quality

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2D-1. Indicate the percentage of unduplicated client records with null or missing values and the percentage of "Client Doesn't Know" or "Client Refused" during the time period of October 1, 2013 through September 30, 2014.**

Universal Data Element	Percentage Null or Missing	Percentage Client Doesn't Know or Refused
3.1 Name	0%	0%
3.2 Social Security Number	5%	1%
3.3 Date of birth	4%	0%
3.4 Race	13%	0%
3.5 Ethnicity	10%	1%
3.6 Gender	3%	0%
3.7 Veteran status	32%	0%
3.8 Disabling condition	63%	0%
3.9 Residence prior to project entry	66%	0%
3.10 Project Entry Date	0%	0%
3.11 Project Exit Date	0%	0%
3.12 Destination	54%	2%
3.15 Relationship to Head of Household	69%	0%
3.16 Client Location	100%	0%
3.17 Length of time on street, in an emergency shelter, or safe haven	100%	0%

**2D-2. Identify which of the following reports your HMIS generates. Select all that apply:**

CoC Annual Performance Report (APR):	<input checked="" type="checkbox"/>
ESG Consolidated Annual Performance and Evaluation Report (CAPER):	<input checked="" type="checkbox"/>
Annual Homeless Assessment Report (AHAR) table shells:	<input checked="" type="checkbox"/>

	<input type="checkbox"/>
None	<input type="checkbox"/>

**2D-3. If you submitted the 2015 AHAR, how many AHAR tables (i.e., ES-ind, ES-family, etc) were accepted and used in the last AHAR?** 2

**2D-4. How frequently does the CoC review data quality in the HMIS?** Quarterly

**2D-5. Select from the dropdown to indicate if standardized HMIS data quality reports are generated to review data quality at the CoC level, project level, or both?** Both Project and CoC

**2D-6. From the following list of federal partner programs, select the ones that are currently using the CoC's HMIS.**

VA Supportive Services for Veteran Families (SSVF):	<input checked="" type="checkbox"/>
VA Grant and Per Diem (GPD):	<input checked="" type="checkbox"/>
Runaway and Homeless Youth (RHY):	<input type="checkbox"/>
Projects for Assistance in Transition from Homelessness (PATH):	<input type="checkbox"/>
	<input type="checkbox"/>
None:	<input type="checkbox"/>

**2D-6a. If any of the federal partner programs listed in 2D-6 are not currently entering data in the CoC's HMIS and intend to begin entering data in the next 12 months, indicate the federal partner program and the anticipated start date. (limit 750 characters)**

Philadelphia CoC's new HMIS is expected to go live in Spring 2016. At that time, RHY funded projects will begin participating in HMIS. The Philadelphia CoC is aware that RHY funded projects were required to begin participating in HMIS in the Spring of 2015 with their first report out of HMIS due December 2015. The CoC has been communicating the HMIS transition status with RHY funded projects. PATH funded projects are on target to begin participating in HMIS by June 2016

## 2E. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count

### Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**The data collected during the PIT count is vital for both CoCs and HUD. Communities need accurate data to determine the size and scope of homelessness at the local level so they can best plan for services and programs that will appropriately address local needs and measure progress in addressing homelessness. HUD needs accurate data to understand the extent and nature of homelessness throughout the country, and to provide Congress and the Office of Management and Budget (OMB) with information regarding services provided, gaps in service, and performance. This information helps inform Congress' funding decisions, and it is vital that the data reported is accurate and of high quality.**

2E-1. Did the CoC approve the final sheltered PIT count methodology for the 2015 sheltered PIT count? Yes

2E-2. Indicate the date of the most recent sheltered PIT count (mm/dd/yyyy): 01/21/2015

2E-2a. If the CoC conducted the sheltered PIT count outside of the last 10 days of January 2015, was an exception granted by HUD? Yes

2E-3. Enter the date the CoC submitted the sheltered PIT count data in HDX, (mm/dd/yyyy): 05/15/2015

## 2F. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count: Methods

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2F-1. Indicate the method(s) used to count sheltered homeless persons during the 2015 PIT count:**

Complete Census Count:	<input checked="" type="checkbox"/>
Random sample and extrapolation:	<input type="checkbox"/>
Non-random sample and extrapolation:	<input type="checkbox"/>
	<input type="checkbox"/>

**2F-2. Indicate the methods used to gather and calculate subpopulation data for sheltered homeless persons:**

HMIS:	<input type="checkbox"/>
HMIS plus extrapolation:	<input type="checkbox"/>
Interview of sheltered persons:	<input type="checkbox"/>
Sample of PIT interviews plus extrapolation:	<input type="checkbox"/>
Project – level surveys. The CoC distributed project-level surveys to each housing project included on the HIC. Prior to the night of the PIT count, the CoC distributed a letter to every homeless assistance provider to reiterate the importance of participating in the count & providing accurate & complete data. The standardized survey was distributed to identified PIT Count “leaders” at each project. The survey contained detailed instructions and definitions of each subpopulation. The survey was created in Excel and contained numerous formulas to identify inconsistent data as the providers completed the form. Providers were instructed to collect the required subpopulation data either through client records (case management files) and/or HMIS and to return the completed surveys by fax or email to the CoC Lead Agency within 3 days of the PIT count, where they were reviewed and analyzed for accuracy.	<input checked="" type="checkbox"/>

**2F-3. Provide a brief description of your CoC's sheltered PIT count methodology and describe why your CoC selected its sheltered PIT count methodology. (limit 1000 characters)**

As in years past, the Philadelphia CoC conducted a complete census count of sheltered persons in all projects identified on the HIC. Due to the challenges experienced by the Philadelphia CoC with its implementation of a new HMIS in 2015, the CoC chose to collect both population and subpopulation data for sheltered homeless persons through provider-level surveys. Due to consistent follow-up, 100% of all projects participated in the count by returning the surveys to the CoC lead agency.

**2F-4. Describe any change in methodology from your sheltered PIT count in 2014 to 2015, including any change in sampling or extrapolation method, if applicable. Do not include information on changes to the implementation of your sheltered PIT count methodology (e.g., enhanced training and change in partners participating in the PIT count). (limit 1000 characters)**

Not Applicable

**2F-5. Did your CoC change its provider coverage in the 2015 sheltered count?** Yes

**2F-5a. If "Yes" in 2F-5, then describe the change in provider coverage in the 2015 sheltered count. (limit 750 characters)**

The provider coverage in the 2015 sheltered count changed due to the following reasons:

- 1 Emergency Housing (EH) project was not included because it re-tooled its project model and no longer exclusively serves homeless individuals.
- 3 EH projects closed.
- 3 EH projects opened, including 1 receiving VADOM funding.
- 1 TH project reallocated to a Permanent Supportive Housing Project
- 1 TH project opened



## 2G. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count: Data Quality

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2G-1. Indicate the methods used to ensure the quality of the data collected during the sheltered PIT count:**

Training:	<input type="checkbox"/>
Provider follow-up:	<input checked="" type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Non-HMIS de-duplication techniques:	<input checked="" type="checkbox"/>
	<input type="checkbox"/>

**2G-2. Describe any change to the way your CoC implemented its sheltered PIT count from 2014 to 2015 that would change data quality, including changes to training volunteers and inclusion of any partner agencies in the sheltered PIT count planning and implementation, if applicable. Do not include information on changes to actual sheltered PIT count methodology (e.g., change in sampling or extrapolation method). (limit 1000 characters)**

Not Applicable

## 2H. Continuum of Care (CoC) Unsheltered Point-in-Time (PIT) Count

### Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**The unsheltered PIT count assists communities and HUD to understand the characteristics and number of people with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground. CoCs are required to conduct an unsheltered PIT count every 2 years (biennially) during the last 10 days in January; however, CoCs are strongly encouraged to conduct the unsheltered PIT count annually, at the same time that it does the annual sheltered PIT count. The last official PIT count required by HUD was in January 2015.**

**2H-1. Did the CoC approve the final unsheltered PIT count methodology for the most recent unsheltered PIT count?** Yes

**2H-2. Indicate the date of the most recent unsheltered PIT count (mm/dd/yyyy):** 01/21/2015

**2H-2a. If the CoC conducted the unsheltered PIT count outside of the last 10 days of January 2015, was an exception granted by HUD?** Yes

**2H-3. Enter the date the CoC submitted the unsheltered PIT count data in HDX (mm/dd/yyyy):** 05/15/2015

## 2I. Continuum of Care (CoC) Unsheltered Point-in-Time (PIT) Count: Methods

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2I-1. Indicate the methods used to count unsheltered homeless persons during the 2015 PIT count:**

Night of the count - complete census:	<input type="checkbox"/>
Night of the count - known locations:	<input checked="" type="checkbox"/>
Night of the count - random sample:	<input type="checkbox"/>
Service-based count:	<input type="checkbox"/>
HMIS:	<input type="checkbox"/>
	<input type="checkbox"/>

**2I-2. Provide a brief description of your CoC's unsheltered PIT count methodology and describe why your CoC selected its unsheltered PIT count methodology. (limit 1000 characters)**

Philadelphia CoC utilized the Night of the Count – Known Locations methodology to conduct the unsheltered PIT count. Known locations were selected by utilizing the following data: information from quarterly street counts, all street outreach contacts, public response calls to the Outreach Coordination Center that identified individuals outside of the street outreach teams targeted areas, and the homeless death review database which contains last known homeless location for each decedent. On the night of the PIT count, volunteers were sent to 32 areas within Philadelphia. Volunteers were required to canvass block by block in some of the zones; in others, volunteers were instructed to count at a known hot spot, such as a library or train station. CoC uses this methodology rather than a complete coverage count due to the large geographic area of the CoC (143 square miles) & its comprehensive knowledge of the known locations of unsheltered individuals through 24/7, 365 day street outreach.

**2I-3. Describe any change in methodology from your unsheltered PIT count in 2014 (or 2013 if an unsheltered count was not conducted in 2014) to 2015, including any change in sampling or extrapolation method, if applicable. Do not include information on changes to implementation of your sheltered PIT count methodology (e.g., enhanced training and change in partners participating in the count). (limit 1000 characters)**

Not Applicable

**2I-4. Does your CoC plan on conducting an unsheltered PIT count in 2016?** Yes

(If "Yes" is selected, HUD expects the CoC to conduct an unsheltered PIT count in 2016. See the FY 2015 CoC Program NOFA, Section VII.A.4.d. for full information.)

## 2J. Continuum of Care (CoC) Unsheltered Point-in-Time (PIT) Count: Data Quality

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**2J-1. Indicate the steps taken by the CoC to ensure the quality of the data collected for the 2015 unsheltered population PIT count:**

Training:	<input type="checkbox"/>
"Blitz" count:	<input checked="" type="checkbox"/>
Unique identifier:	<input type="checkbox"/>
Survey question:	<input checked="" type="checkbox"/>
Enumerator observation:	<input type="checkbox"/>
	<input type="checkbox"/>
None:	<input type="checkbox"/>

**2J-2. Describe any change to the way the CoC implemented the unsheltered PIT count from 2014 (or 2013 if an unsheltered count was not conducted in 2014) to 2015 that would affect data quality. This includes changes to training volunteers and inclusion of any partner agencies in the unsheltered PIT count planning and implementation, if applicable. Do not include information on changes to actual methodology (e.g., change in sampling or extrapolation method). (limit 1000 characters)**

Several changes contributed to what the CoC concludes is a more accurate count in 2015. First, the 2015 unsheltered PIT count covered a broader geographic area than in 2014. Specifically, volunteers were sent to three additional areas of the City, based on calls to the outreach hotline. PIT Count volunteers were sent for the first time to Emergency Rooms in and outside of Center City to count persons using the ER as a shelter. In addition, while individuals were invited to participate in surveys in both years, the instructions to volunteers and forms for counting individuals who declined to be surveyed was improved in 2015. Lastly, the use of more community-based volunteers, knowledgeable about the locations of individuals in one particular area of the City, resulted in a large increase in the number of individuals counted.

## 3A. Continuum of Care (CoC) System Performance

### Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

### 3A-1. Performance Measure: Number of Persons Homeless - Point-in-Time Count.

#### \* 3A-1a. Change in PIT Counts of Sheltered and Unsheltered Homeless Persons

Using the table below, indicate the number of persons who were homeless at a Point-in-Time (PIT) based on the 2014 and 2015 PIT counts as recorded in the Homelessness Data Exchange (HDX).

	2014 PIT (for unsheltered count, most recent year conducted)	2015 PIT	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	5,738	5,998	260
Emergency Shelter Total	3,642	3,558	-84
Safe Haven Total	113	109	-4
Transitional Housing Total	1,622	1,661	39
Total Sheltered Count	5,377	5,328	-49
Total Unsheltered Count	361	670	309

### 3A-1b. Number of Sheltered Persons Homeless - HMIS.

Using HMIS data, CoCs must use the table below to indicate the number of homeless persons who were served in a sheltered environment between October 1, 2013 and September 30, 2014.

	Between October 1, 2013 and September 30, 2014
Universe: Unduplicated Total sheltered homeless persons	12,861
Emergency Shelter Total	10,386
Safe Haven Total	101
Transitional Housing Total	2,664

**3A-2. Performance Measure: First Time Homeless.**

**Describe the CoC’s efforts to reduce the number of individuals and families who become homeless for the first time. Specifically, describe what the CoC is doing to identify risk factors for becoming homeless for the first time.  
(limit 1000 characters)**

Based on data about households requesting shelter and results of a social worker survey with clients, risk factors are: very low/no income, no prior independent housing, and a household financial crisis (e.g. loss of job/reduction of hours, death in family). Diversion is practiced daily at the City’s centralized intake, where households are assessed to determine homeless status and whether the household can safely return to a prior residence or with a family or friend; or whether they can be connected to RR and avoid shelter altogether. The City’s homeless prevention program provides payment of back rent to avoid eviction, and/or security deposit to relocate to a new unit if possible, including those being evicted from PHA; coordinates with landlord/tenant court; and assists households involved in fire or City closure of dangerous residences to relocate rapidly without the use of shelter.

**3A-3. Performance Measure: Length of Time Homeless.**

**Describe the CoC’s efforts to reduce the length of time individuals and families remain homeless. Specifically, describe how your CoC has reduced the average length of time homeless, including how the CoC identifies and houses individuals and families with the longest lengths of time homeless.  
(limit 1000 characters)**

Street outreach workers record contacts with individuals in unsheltered situations; a data warehouse generates a “priority” list of individuals homeless the longest who meet the definition of chronic homelessness. A collaboration between OSH, DBH and outreach fast-tracks individuals on the list to entry level programs, where they are prioritized for PSH. OSH uses a “simple HMIS” database to track client-level information on the HUD assessment until full HMIS implementation with a new vendor is complete. Specific efforts to reduce the length of time homeless include: 1) Connecting households to Rapid Rehousing at shelter intake whenever possible 2) Requiring shelter providers to initiate housing applications as soon as possible upon entry 3) Limiting length of transitional housing programs 4) Utilizing SSVF funding to bridge veterans into housing until the VASH process is fully completed 5) Utilizing SSVF to immediately enroll into housing.



**\* 3A-4. Performance Measure: Successful Permanent Housing Placement or Retention.**

**In the next two questions, CoCs must indicate the success of its projects in placing persons from its projects into permanent housing.**

**3A-4a. Exits to Permanent Housing Destinations:**

In the chart below, CoCs must indicate the number of persons in CoC funded supportive services only (SSO), transitional housing (TH), and rapid re-housing (RRH) project types who exited into permanent housing destinations between October 1, 2013 and September 30, 2014.

	Between October 1, 2013 and September 30, 2014
Universe: Persons in SSO, TH and PH-RRH who exited	585
Of the persons in the Universe above, how many of those exited to permanent destinations?	227
<b>% Successful Exits</b>	<b>38.80%</b>

**3A-4b. Exit To or Retention Of Permanent Housing:**

In the chart below, CoCs must indicate the number of persons who exited from any CoC funded permanent housing project, except rapid re-housing projects, to permanent housing destinations or retained their permanent housing between October 1, 2013 and September 31, 2014.

	Between October 1, 2013 and September 30, 2014
Universe: Persons in all PH projects except PH-RRH	3,913
Of the persons in the Universe above, indicate how many of those remained in applicable PH projects and how many of those exited to permanent destinations?	3,695
<b>% Successful Retentions/Exits</b>	<b>94.43%</b>

**3A-5. Performance Measure: Returns to Homelessness:**

**Describe the CoC’s efforts to reduce the rate of individuals and families who return to homelessness. Specifically, describe at least three strategies your CoC has implemented to identify and minimize returns to homelessness, and demonstrate the use of HMIS or a comparable database to monitor and record returns to homelessness. (limit 1000 characters)**

Over the past 18 months, HMIS implementation problems hampered access to data, and the integration of coordinated assessment. Go-live with a new HMIS is expected in early 2016, well-timed to begin using recidivism Measures 2a and 2b in the System Performance Measures. The CoC will select and implement a common assessment tool that considers previous history in housing matching, and adopt an order of priority that incorporates homeless history. Previously, HMIS provided clients' history of homelessness as a basis for service planning to prevent future episodes; HMIS data was used for a Cloudburst analysis of RR data and identified # of previous episodes as a risk factor for additional episodes. Applications for TH, RR, and PSH include homeless history, which is used to assess intensity of services that may be needed to improve housing stability; and the by-name list for veterans tracks returns to homelessness following prevention or housing assistance.

**3A-6. Performance Measure: Job and Income Growth.**

**Describe specific strategies implemented by CoC Program-funded projects to increase the rate by which homeless individuals and families increase income from employment and non-employment sources (include at least one specific strategy for employment income and one for non-employment related income, and name the organization responsible for carrying out each strategy). (limit 1000 characters)**

Strategies to improve employment income include a community-based Financial Opportunity Center operated by People's Emergency Center that provides employment support to West Philadelphia CoC project participants. The CoC conducted a TA Workshop to Increase Employment Outcomes, with an emphasis on orienting program staff to adopt a philosophy of encouraging work: Homeless Advocacy Project (HAP) provided details about how participants may receive both SSI/SSDI and employment income; providers shared supported employment, social enterprises, and adult learning strategies. Project HOME's social enterprises (public library café, homemade gifts) employ more than 100 homeless/formerly homeless men and women. For non employment assistance, HAP runs Philadelphia's SOAR project, achieving 215 SSI/SSDI approvals in FY15, 8 denials, in an average of 57 days. In addition to chronically homeless men and women, SOAR assists youth aging out, individuals homeless at re-entry & veterans through SSVF.

**3A-6a. Describe how the CoC is working with mainstream employment organizations to aid homeless individuals and families in increasing their income. (limit 1000 characters)**

Many Philadelphians experiencing homelessness are not able to access the level and type of support needed through the mainstream workforce development system. The CoC works with the Community Action Agency, the Mayor's Office of Community Empowerment and Opportunity (CEO) to address poverty. CEO leads the City's strategy to increase job opportunities and training for those with the greatest barriers to employment, and developing new career pathways toward family sustaining jobs. Three recipients (AchieveAbility, People's Emergency Center, Catholic Social Services) operate Financial Empowerment Centers, supported by Bloomberg Philanthropies and Living Cities CFE Fund, to assist in moving from debt to savings. CEO funded BenePhilly Centers screen and help residents apply for benefits/entitlements and services. Three of 6 Centers are operated by grantees (CSS, PEC, Project HOME). City funds residential employment programs through Doe/Ready, Willing and Able & Depaul Foundation.

**3A-7. Performance Measure: Thoroughness of Outreach.**

**How does the CoC ensure that all people living unsheltered in the CoC's geographic area are known to and engaged by providers and outreach teams?  
(limit 1000 characters)**

Street outreach is overseen by Project HOME's Outreach Coordination Center (OCC) & funded by DBH. OCC coordinates 5 street outreach teams run by nonprofit organizations, which operate year-round, around the clock, with over 30 staff and more during severe weather to preserve the lives of those most at risk. The general public can call a 24-hour outreach hotline to request an outreach team to be dispatched anyplace in the City. Outreach coordinates with VA and youth outreach workers, and uses targeted outreach to specific areas where homeless individuals who are least likely to access services reside. Teams connect individuals with shelter and services. Outreach contacts are tracked using a handheld device, and information is used to identify individuals for the City's outreach priority list. The data feeds into the City's social service warehouse, CARES, where shelter and other social service usage information is maintained and analyzed.

**3A-7a. Did the CoC exclude geographic areas from the 2015 unsheltered PIT count where the CoC determined that there were no unsheltered homeless people, including areas that are uninhabitable (e.g., deserts)?** Yes

**3A-7b. What was the the criteria and decision-making process the CoC used to identify and exclude specific geographic areas from the CoC's unsheltered PIT count?  
(limit 1000 characters)**

The planning committee for the unsheltered PIT Count includes OSH, Department of Behavioral Health (DBH), Project HOME (coordinates outreach & unsheltered counts), and Valley Youth House (coordinates youth-specific counts) and other key stakeholders. The PIT Count Committee carefully considered the methodologies in HUD's 2014 PIT Count Methodology Guide and decided to continue the "known location" methodology given extensive knowledge of the location of persons by outreach teams, with the expansion of covered geographic areas. Geographic areas were excluded if they had no known unsheltered homeless persons based on results of previous quarterly point in time counts, street outreach contact database, response calls to the street outreach hotline, last known homeless location of homeless decedents identified through the City's Homeless Death Review, and information gathered through partnerships with community organizations in which street outreach is not normally targeted.

## 3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

### Objective 1: Ending Chronic Homelessness

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDExchange Ask A Question.

**Opening Doors, Federal Strategic Plan to Prevent and End Homelessness (as amended in 2015) establishes the national goal of ending chronic homelessness. Although the original goal was to end chronic homelessness by the end of 2015, that goal timeline has been extended to 2017. HUD is hopeful that communities that are participating in the Zero: 2016 technical assistance initiative will continue to be able to reach the goal by the end of 2016. The questions in this section focus on the strategies and resources available within a community to help meet this goal.**

**3B-1.1. Compare the total number of chronically homeless persons, which includes persons in families, in the CoC as reported by the CoC for the 2015 PIT count compared to 2014 (or 2013 if an unsheltered count was not conducted in 2014).**

	2014 (for unsheltered count, most recent year conducted)	2015	Difference
Universe: Total PIT Count of sheltered and unsheltered chronically homeless persons	702	829	127
Sheltered Count of chronically homeless persons	461	468	7
Unsheltered Count of chronically homeless persons	241	361	120

**3B-1.1a. Using the "Differences" calculated in question 3B-1.1 above, explain the reason(s) for any increase, decrease, or no change in the overall TOTAL number of chronically homeless persons in the CoC, as well as the change in the unsheltered count, as reported in the PIT count in 2015 compared to 2014. To possibly receive full credit, both the overall total and unsheltered changes must be addressed. (limit 1000 characters)**

There was an increase of chronically homeless individuals overall by 21%, largely attributed to an increase in individuals counted outdoors. The unsheltered count increased by 179%, due to warmer temperatures, broader count geography, and improved methodology. Winter of 2014 was very cold, and the count was postponed due to a significant snow event; in 2015, the temperatures were significantly warmer (2014- low temperature was 12, 2015- low 36), leading to more individuals found outdoors. The count covered a broader geographic area in 2015 per HUD and CoC methodology, which requires sampling in locations where individuals have not previously been found as well as expanded zones and other areas. In one area of the City, weather, improved methodology and skilled enumerators who work in the community were contributing factors to an increase of 720% over the prior year, with 144 more persons counted in 2015 than in 2014.

**3B-1.2. From the FY 2013/FY 2014 CoC Application: Describe the CoC's two year plan (2014-2015) to increase the number of permanent supportive housing beds available for chronically homeless persons and to meet the proposed numeric goals as indicated in the table above. Response should address the specific strategies and actions the CoC will take to achieve the goal of ending chronic homelessness by the end of 2015. (read only)**

Phila's Dedicating Opportunities to end Homelessness team set a goal to house 519 CH individuals by 2015 using the Strategic Planning guide developed by USICH. To meet this goal the DOEH team identified turnover & pipeline units & solidified commitments for creation of new units. Action steps: 1) Continue to use data to identify & locate CH individuals w/a focus on those in unsheltered situations 2) Assign CH individuals to outreach teams' focus lists for engagement into treatment, Safe Havens, &/or PSH 3) Ensure all projects committed to dedicating CH units do so; add 220 dedicated units in 2014 & 50 in 2015; prioritize 79 beds in 2014 & 115 in 2015 at turnover 4) Provide TA/training to CoC providers to revise tenant selection plans to prioritize CH 5) Reallocate or reduce CoC projects to create 90 new units. In 2013 CoC funded services were reduced from 1 project & covered by MA to create 30 new CoC Housing First subsidies. 6) Continue partnership w/ Philadelphia Housing Authority to utilize Housing Choice Vouchers commitment toward this effort & HUD for multifamily units 7) Phase more CoC units into PSH Clearinghouse, which refers CH individuals to PHA units & CoC PSH projects.

**3B-1.2a. Of the strategies listed in the FY 2013/FY 2014 CoC Application represented in 3B-1.2, which of these strategies and actions were accomplished? (limit 1000 characters)**

The Philadelphia DOEH team extended the timeline to end chronic homelessness to 2016 along with HUD. Achievements: 1) CoC continues to utilize by-name “priority lists” to identify unsheltered individuals with frequent outreach contacts, 2) Individuals are assigned for focus by street outreach teams; 3) Philadelphia prioritized 50% of beds made available through turnover to the chronically homeless and conducted a meeting to clarify meaning and processes around “prioritization” vs “dedication” of beds. 5) Exceeded 90 bed goal by 107 beds, largely due to the 2014 VASH award of 169 beds, all of which prioritized veterans experiencing chronic homelessness; and implemented the 30 new Housing First units; 1000 individuals were housed by PHA in the singles Blueprint collaboration since 2009, with 89% retention; and the PSH clearinghouse increased its inventory from 500 to more than 1700 units.

**3B-1.3. Compare the total number of PSH beds (CoC Program and non-CoC Program funded) that were identified as dedicated for use by chronically homeless persons on the 2015 Housing Inventory Count, as compared to those identified on the 2014 Housing Inventory Count.**

	2014	2015	Difference
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homelessness persons identified on the HIC.	1,138	1,497	359

**3B-1.3a. Explain the reason(s) for any increase, decrease or no change in the total number of PSH beds (CoC Program and non CoC Program funded) that were identified as dedicated for use by chronically homeless persons on the 2015 Housing Inventory Count compared to those identified on the 2014 Housing Inventory Count. (limit 1000 characters)**

The increase in PSH beds dedicated for chronically homeless persons is due largely to the VASH program, which in Philadelphia totals 800 beds, including 90 chronic dedicated beds in the 2014 VASH allocation. In addition, 3 projects serving individuals with mental illness converted existing beds for use exclusively by chronic homeless persons, one transitional housing program converted to a permanent supportive housing program serving chronic homeless individuals, and one new project opened which serves young people age 18-24 experiencing chronic homelessness.

**3B-1.4. Did the CoC adopt the orders of priority in all CoC Program-funded PSH as described in Notice CPD-14-012: Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status ?**

No

**3B-1.4a. If “Yes”, attach the CoC’s written standards that were updated to incorporate the order of priority in Notice CPD-14-012 and indicate the page(s) that contain the CoC’s update.** Not Applicable

**3B-1.5. CoC Program funded Permanent Supportive Housing Project Beds prioritized for serving people experiencing chronic homelessness in FY2015 operating year.**

Percentage of CoC Program funded PSH beds prioritized for chronic homelessness	FY2015 Project Application
Based on all of the renewal project applications for PSH, enter the estimated number of CoC-funded PSH beds in projects being renewed in the FY 2015 CoC Program Competition that are not designated as dedicated beds for persons experiencing chronic homelessness.	2,903
Based on all of the renewal project applications for PSH, enter the estimated number of CoC-funded PSH beds in projects being renewed in the FY 2015 CoC Program Competition that are not designated as dedicated beds for persons experiencing chronic homelessness that will be made available through turnover in the FY 2015 operating year.	228
Based on all of the renewal project applications for PSH, enter the estimated number of PSH beds made available through turnover that will be prioritized beds for persons experiencing chronic homelessness in the FY 2015 operating year.	156
This field estimates the percentage of turnover beds that will be prioritized beds for persons experiencing chronic homelessness in the FY 2015 operating year.	68.42%

**3B-1.6. Is the CoC on track to meet the goal of ending chronic homelessness by 2017?** Yes

This question will not be scored.

**3B-1.6a. If “Yes,” what are the strategies implemented by the CoC to maximize current resources to meet this goal? If “No,” what resources or technical assistance will be implemented by the CoC to reach the goal of ending chronically homeless by 2017? (limit 1000 characters)**



Under Dedicating Opportunities to End Homelessness Initiative, the CoC and partners used data driven methods to establish housing placement goals to end chronic homelessness with a special focus on individuals living outdoors for the longest periods of time. A by-name "priority list" is generated with outreach data, and street outreach teams are assigned individuals from that list for engagement into Safe Haven, treatment, shelter, and ultimately permanent housing. The goal is to house 519 by December 2016; 350 men and women have been housed to date. Additional resources are needed to assist individuals who are most vulnerable with the most severe service needs, especially substance abuse service needs, especially in light of increased numbers in the 2015 PIT count. The 2014 Housing First CoC project application was not awarded, and the CoC is seeking funding for the 2015 request for 60 additional Housing First units operated by Pathways to Housing PA.

## 3B. Continuum of Care (CoC) Strategic Planning Objectives

### Objective 2: Ending Homelessness Among Households with Children and Ending Youth Homelessness

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**Opening Doors outlines the goal of ending family (Households with Children) and youth homelessness by 2020. The following questions focus on the various strategies that will aid communities in meeting this goal.**

**3B-2.1. What factors will the CoC use to prioritize households with children during the FY2015 Operating year? (Check all that apply).**

Vulnerability to victimization:	<input checked="" type="checkbox"/>
Number of previous homeless episodes:	<input type="checkbox"/>
Unsheltered homelessness:	<input checked="" type="checkbox"/>
Criminal History:	<input type="checkbox"/>
Bad credit or rental history (including not having been a leaseholder):	<input type="checkbox"/>
Head of household has mental/physical disabilities:	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
N/A:	<input type="checkbox"/>

**3B-2.2. Describe the CoC's plan to rapidly rehouse every family that becomes homeless within 30 days of becoming homeless on the street or entering shelter. (limit 1000 characters)**

No families are on the street; any family outdoors is immediately engaged by outreach, housing and child welfare who use all appropriate resources to quickly provide indoor options. Shelter case managers are required to submit housing applications for TH, RRH, PH and/or PSH and assist families in obtaining all documentation. Through the coordinated entry planning process, OSH is reconsidering how to screen families for RR at intake, which was done during HPRP; implementing a common assessment tool; and incorporating all the CoC inventory into the referral process. No families are screened out of TH for any reason. Philadelphia's RR resources are funded by CoC, ESG, and HOME funds. At least one of the 2 HOME-funded TH projects will become RR in the coming year, and the CoC will continue its review of scattered site CoC funded TH for reallocation to RR. In this application, the CoC requests funding to expand the RR program by 65 units through reallocation and bonus funding.

**3B-2.3. Compare the number of RRH units available to serve families from the 2014 and 2015 HIC.**

	2014	2015	Difference
RRH units available to serve families in the HIC:	134	147	13

**3B-2.4. How does the CoC ensure that emergency shelters, transitional housing, and permanent housing (PSH and RRH) providers within the CoC do not deny admission to or separate any family members from other members of their family based on age, sex, or gender when entering shelter or housing? (check all strategies that apply)**

CoC policies and procedures prohibit involuntary family separation:	<input type="checkbox"/>
There is a method for clients to alert CoC when involuntarily separated:	<input checked="" type="checkbox"/>
CoC holds trainings on preventing involuntary family separation, at least once a year:	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
None:	<input type="checkbox"/>

**3B-2.5. Compare the total number of homeless households with children in the CoC as reported by the CoC for the 2015 PIT count compared to 2014 (or 2013 if an unsheltered count was not conducted in 2014).**

**PIT Count of Homelessness Among Households With Children**

	2014 (for unsheltered count, most recent year conducted)	2015	Difference
Universe: Total PIT Count of sheltered and unsheltered homeless households with children:	932	906	-26
Sheltered Count of homeless households with children:	932	906	-26
Unsheltered Count of homeless households with children:	0	0	0

**3B-2.5a. Explain the reason(s) for any increase, decrease or no change in the total number of homeless households with children in the CoC as reported in the 2015 PIT count compared to the 2014 PIT count. (limit 1000 characters)**

Philadelphia reported no unsheltered families in 2014 and 2015; in 2015, there were 26 fewer sheltered households, a reduction of 3%. This decrease can be contributed to the Philadelphia CoC’s continued partnership with the Philadelphia Housing Authority (PHA), through which PHA commits 300 housing opportunities for homeless families annually. There was no change to the PIT count methodology that would account for the decrease.

**3B-2.6. Does the CoC have strategies to address the unique needs of unaccompanied homeless youth (under age 18, and ages 18-24), including the following:**

Human trafficking and other forms of exploitation?	Yes
LGBTQ youth homelessness?	Yes
Exits from foster care into homelessness?	Yes
Family reunification and community engagement?	No
Positive Youth Development, Trauma Informed Care, and the use of Risk and Protective Factors in assessing youth housing and service needs?	Yes
Unaccompanied minors/youth below the age of 18?	Yes

**3B-2.6a. Select all strategies that the CoC uses to address homeless youth trafficking and other forms of exploitation.**

Diversion from institutions and decriminalization of youth actions that stem from being trafficked:	<input checked="" type="checkbox"/>
Increase housing and service options for youth fleeing or attempting to flee trafficking:	<input checked="" type="checkbox"/>
Specific sampling methodology for enumerating and characterizing local youth trafficking:	<input checked="" type="checkbox"/>
Cross systems strategies to quickly identify and prevent occurrences of youth trafficking:	<input checked="" type="checkbox"/>
Community awareness training concerning youth trafficking:	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
N/A:	<input type="checkbox"/>

**3B-2.7. What factors will the CoC use to prioritize unaccompanied youth (under age 18, and ages 18-24) for housing and services during the FY2015 operating year? (Check all that apply)**

Vulnerability to victimization:	<input checked="" type="checkbox"/>
Length of time homeless:	<input type="checkbox"/>
Unsheltered homelessness:	<input checked="" type="checkbox"/>
Lack of access to family and community support networks:	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
N/A:	<input type="checkbox"/>

**3B-2.8. Using HMIS, compare all unaccompanied youth (under age 18, and ages 18-24) served in any HMIS contributing program who were in an unsheltered situation prior to entry in FY 2013 (October 1, 2012 - September 30, 2013) and FY 2014 (October 1, 2013 - September 30, 2014).**

	FY 2013 (October 1, 2012 - September 30, 2013)	FY 2014 (October 1, 2013 - September 30, 2014)	Difference
Total number of unaccompanied youth served in HMIS contributing programs who were in an unsheltered situation prior to entry:	6	6	0

**3B-2.8a. If the number of unaccompanied youth and children, and youth-headed households with children served in any HMIS contributing program who were in an unsheltered situation prior to entry in FY 2014 is lower than FY 2013, explain why. (limit 1000 characters)**

Not Applicable

**3B-2.9. Compare funding for youth homelessness in the CoC's geographic area in CY 2015 to projected funding for CY 2016.**

	Calendar Year 2015	Calendar Year 2016	Difference
Overall funding for youth homelessness dedicated projects (CoC Program and non-CoC Program funded):	\$6,179,997.94	\$6,924,594.66	\$744,596.72
CoC Program funding for youth homelessness dedicated projects:	\$850,718.00	\$1,024,903.00	\$174,185.00
Non-CoC funding for youth homelessness dedicated projects (e.g. RHY or other Federal, State and Local funding):	\$5,329,279.94	\$5,899,691.66	\$570,411.72

**3B-2.10. To what extent have youth housing and service providers and/or State or Local educational representatives, and CoC representatives participated in each other's meetings over the past 12 months?**

Cross-Participation in Meetings	# Times
CoC meetings or planning events attended by LEA or SEA representatives:	5
LEA or SEA meetings or planning events (e.g. those about child welfare, juvenile justice or out of school time) attended by CoC representatives:	1
CoC meetings or planning events attended by youth housing and service providers (e.g. RHY providers):	3

**3B-2.10a. Given the responses in 3B-2.10, describe in detail how the CoC collaborates with the McKinney-Vento local education liaisons and State educational coordinators. (limit 1000 characters)**

School District of Philadelphia (SDP) McKinney Liaison convenes regular meetings w/homeless service providers to ensure access to McKinney Vento services and supports, and connects families and providers with designated staff in each school. SDP and CoC's Family Service Providers Network (FSPN) educate community about homeless children using data & materials. SDP teachers deliver afterschool programming in shelters. SDP provides Youth Risk Behavior Survey data for analysis to inform planning and service efforts for youth homeless & those at risk of homelessness who are known to the shelter system and those who are not. Annually, FSPN launches a mass communication effort for EH/TH staff to contact the schools their children attend to foster service coordination. Children's Workgroup Committee works with SDP and other Head Start programs to increase access. SDP participates on CoC Coalition with RHY and other youth & service providers to plan for young people experiencing homelessness.

**3B-2.11. How does the CoC make sure that homeless participants are informed of their eligibility for and receive access to educational services? Include the policies and procedures that homeless service providers (CoC and ESG Programs) are required to follow. In addition, include how the CoC, together with its youth and educational partners (e.g. RHY, schools, juvenile justice and children welfare agencies), identifies participants who are eligible for CoC or ESG programs. (limit 2000 characters)**

The School District of Philadelphia McKinney-Vento liaison convenes meetings with all family homeless service providers and offers special programming, including funding for 16 after school and 18 summer enrichment programs. TEEN assists high school students up to age 19 who are in-shelter or doubled up/displaced due to hardship, in getting on the fast track to post-secondary academic and career success through enriching activities and services. CoC and OSH reviews ensure each CoC project has a designated staff whose role is to connect families to educational services for which they are eligible; ES and TH providers are contractually required to attend training by the Education Law Center re: McK-V law; ELC conducts surveys and focus groups to identify and address barriers to access and school success among children experiencing homelessness. All families in City shelter, including ESG funded shelter, sign a "Children's Services Agreement" with their case manager and commit to school attendance and support for school performance. A Children's Work Group Early Childhood Committee works to improve services to young children in ES/TH, including testing of the HHS Environmental Rating scale at 3 shelters prior to broader implementation, as developmentally-appropriate settings can boost academic achievement. An HHS Children's Bureau planning grant increased cross-system efforts between child welfare, juvenile justice, homeless, and housing providers. For the past 3 years, RHY and other youth service providers have worked with the CoC to plan for and obtain more reliable counts through surveys of young people experiencing homelessness and housing instability. The PA Dept of Human Services' PA State Interagency Coordinating Council for Early Intervention is providing training to shelter staff re: accessing early intervention services under a new law.

## 3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

### Objective 3: Ending Veterans Homelessness

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**Opening Doors outlines the goal of ending Veteran homelessness by the end of 2015. The following questions focus on the various strategies that will aid communities in meeting this goal.**

**3B-3.1. Compare the total number of homeless Veterans in the CoC as reported by the CoC for the 2015 PIT count compared to 2014 (or 2013 if an unsheltered count was not conducted in 2014).**

	2014 (for unsheltered count, most recent year conducted)	2015	Difference
Universe: Total PIT count of sheltered and unsheltered homeless veterans:	357	337	-20
Sheltered count of homeless veterans:	337	327	-10
Unsheltered count of homeless veterans:	20	10	-10

**3B-3.1a. Explain the reason(s) for any increase, decrease or no change in the total number of homeless veterans in the CoC as reported in the 2015 PIT count compared to the 2014 PIT count. (limit 1000 characters)**

The reduction is due to the Philly Vets Home partnership, an intentional effort to achieve functional zero in Philadelphia that began in August 2013. At the time of the 2015 PIT count, more than 600 veterans had been housed in permanent housing. The reduction occurred despite an expansion in geography in an effort to obtain the most accurate count possible and despite an increase of 86% unsheltered individuals since 2014. New zones were included in the unsheltered count, and persons using Emergency Rooms for shelter were counted for the first time. The number of unsheltered veterans dropped by 50% and veteran homelessness overall was reduced by 6%.



**3B-3.2. How is the CoC ensuring that Veterans that are eligible for VA services are identified, assessed and referred to appropriate resources, i.e. HUD-VASH and SSVF? (limit 1000 characters)**

Public advertising, outreach/navigation efforts, and frequent data queries of individuals in street and shelter are conducted to identify all veterans who served in the armed services, regardless of how long they served or the discharge they received. They are added to the by-name list. The VAMC uses its databases to determine whether the individual is VA eligible; if ineligible, why (dishonorable/other than honorable; National Guard, Reserves, or Training only; unable to verify military service); & whether person is registered with the VA. Individuals with OTH/D discharges are connected to legal services. At bi weekly Veteran Outreach and Navigation Team meetings, new names are assigned to outreach/navigation, who seek/engage and immediately offer permanent housing and an invite to come to the centralized intake for immediate enrollment in a housing program. VONT manages coordinated assessment for SSVF and housing matching to SSVF, VASH, etc.

**3B-3.3. For Veterans who are not eligible for homeless assistance through the U.S Department of Veterans Affairs Programs, how is the CoC prioritizing CoC Program-funded resources to serve this population? (limit 1000 characters)**

When a veteran has unique circumstances or there is no veteran specific CoC slot available, the individual is referred through the VONT to the City which coordinates the CoC & can access non-VA behavioral health services. To date, Philadelphia has housed more than 1300 veterans in two years without prioritizing non-veteran projects or beds in the CoC. There are 127 dedicated CoC units, and fewer non-eligible veterans than we anticipated. We connect veterans to non-VA housing opportunities on an individual basis consistent with their choice. Examples include helping veterans apply for newly developed non-veteran-specific units (801 Arch, CoC-funded St. Raymond's), use non-VASH vouchers through the Blueprint partnership, CoC Housing First units with Medicaid behavioral health services, personal care/nursing home/assisted living beds, & a partnership with HUD & multi-family owners/developers in which veterans are prioritized for referral.

**3B-3.4. Compare the total number of homeless Veterans in the CoC AND the total number of unsheltered homeless Veterans in the CoC, as reported by the CoC for the 2015 PIT Count compared to the 2010 PIT Count (or 2009 if an unsheltered count was not conducted in 2010).**

	2010 (or 2009 if an unsheltered count was not conducted in 2010)	2015	% Difference
--	--	------	--------------

Total PIT count of sheltered and unsheltered homeless veterans:	350	337	-3.71%
Unsheltered count of homeless veterans:	73	10	-86.30%

**3B-3.5. Indicate from the dropdown whether you are on target to end Veteran homelessness by the end of 2015.** Yes

This question will not be scored.

**3B-3.5a. If “Yes,” what are the strategies being used to maximize your current resources to meet this goal? If “No,” what resources or technical assistance would help you reach the goal of ending Veteran homelessness by the end of 2015? (limit 1000 characters)**

The Philly Vets Home team, established in 2013, used a collective impact model to achieve functional zero this year. The system includes outreach and data-based methods to identify newly homeless veterans, who are added to a by-name list; a common assessment; and regular case conferencing. Participating programs in the identification, engagement, assessment, and housing coordination efforts include: City and VA-funded street outreach and navigators, City and VA-funded Safe Haven and emergency shelter; VA Medical Center; City’s personal care home; City-funded transitional housing and VA GPD; SSVF; CoC-funded TH and PSH; PHA non-veteran specific resources; HUD multi-family housing, and VASH.

## 4A. Accessing Mainstream Benefits

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**4A-1. Does the CoC systematically provide information to provider staff about mainstream benefits, including up-to-date resources on eligibility and mainstream program changes that can affect homeless clients?** No

**4A-2. Based on the CoC's FY 2015 new and renewal project applications, what percentage of projects have demonstrated that the project is assisting project participants to obtain mainstream benefits, which includes all of the following within each project: transportation assistance, use of a single application, annual follow-ups with participants, and SOAR-trained staff technical assistance to obtain SSI/SSDI?**

### FY 2015 Assistance with Mainstream Benefits

Total number of project applications in the FY 2015 competition (new and renewal):	105
Total number of renewal and new project applications that demonstrate assistance to project participants to obtain mainstream benefits (i.e. In a Renewal Project Application, "Yes" is selected for Questions 3a, 3b, 3c, 4, and 4a on Screen 4A. In a New Project Application, "Yes" is selected for Questions 5a, 5b, 5c, 6, and 6a on Screen 4A).	31
Percentage of renewal and new project applications in the FY 2015 competition that have demonstrated assistance to project participants to obtain mainstream benefits:	30%

**4A-3. List the healthcare organizations you are collaborating with to facilitate health insurance enrollment (e.g. Medicaid, Affordable Care Act options) for program participants. For each healthcare partner, detail the specific outcomes resulting from the partnership in the establishment of benefits for program participants. (limit 1000 characters)**

Partnerships that provide care and enrollment: Health Care for the Homeless – clinic for vulnerable unsheltered individuals, co-located at intake and emergency shelter sites. Federally Qualified Health Centers operated by two major CoC grantees: Project HOME’s Stephen Klein Wellness Center with Jefferson Hospital; and Horizon House’s Fairmount Primary Care Center. Homeless Health Initiative, run by Children’s Hospital of Philadelphia in family shelters. Benefit access sites (Benephilly) at CoC providers Project HOME and People’s Emergency Center connect with all mainstream benefits. Community Behavioral Health (CBH) – City’s behavioral health Medicaid (MA) MCO funds Connections, BH services in shelter. CBH pays for supportive services for new & renewal CoC projects, including \$3.37M commitment for 2015 new Pathways Housing First project; and \$400,000 in new cost shifting in this application. Participants in CoC/CBH co-funded projects enroll in Medicaid as part of housing entry.

**4A-4. What are the primary ways that the CoC ensures that program participants with health insurance are able to effectively utilize the healthcare benefits available?**

Educational materials:	<input checked="" type="checkbox"/>
In-Person Trainings:	<input type="checkbox"/>
Transportation to medical appointments:	<input type="checkbox"/>
Healthcare Navigators	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
Not Applicable or None:	<input type="checkbox"/>

## 4B. Additional Policies

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

**4B-1. Based on the CoC's FY 2015 new and renewal project applications, what percentage of Permanent Housing (PSH and RRH), Transitional Housing (TH) and SSO (non-Coordinated Entry) projects in the CoC are low barrier? Meaning that they do not screen out potential participants based on those clients possessing a) too little or little income, b) active or history of substance use, c) criminal record, with exceptions for state-mandated restrictions, and d) history of domestic violence.**

### FY 2015 Low Barrier Designation

Total number of PH (PSH and RRH), TH and non-Coordinated Entry SSO project applications in the FY 2015 competition (new and renewal):	103
Total number of PH (PSH and RRH), TH and non-Coordinated Entry SSO renewal and new project applications that selected "low barrier" in the FY 2015 competition:	97
Percentage of PH (PSH and RRH), TH and non-Coordinated Entry SSO renewal and new project applications in the FY 2015 competition that will be designated as "low barrier":	94%

**4B-2. What percentage of CoC Program-funded Permanent Supportive Housing (PSH), RRH, SSO (non-Coordinated Entry) and Transitional Housing (TH) FY 2015 Projects have adopted a Housing First approach, meaning that the project quickly houses clients without preconditions or service participation requirements?**

### FY 2015 Projects Housing First Designation

Total number of PSH, RRH, non-Coordinated Entry SSO, and TH project applications in the FY 2015 competition (new and renewal):	103
Total number of PSH, RRH, non-Coordinated Entry SSO, and TH renewal and new project applications that selected Housing First in the FY 2015 competition:	86
Percentage of PSH, RRH, non-Coordinated Entry SSO, and TH renewal and new project applications in the FY 2015 competition that will be designated as Housing First:	83%

**4B-3. What has the CoC done to ensure awareness of and access to housing and supportive services within the CoC's geographic area to persons that could benefit from CoC-funded programs but are not currently participating in a CoC funded program? In particular, how does the CoC reach out to for persons that are least likely to request housing or services in the absence of special outreach?**

Direct outreach and marketing:	<input type="checkbox"/>
Use of phone or internet-based services like 211:	<input checked="" type="checkbox"/>
Marketing in languages commonly spoken in the community:	<input type="checkbox"/>
Making physical and virtual locations accessible to those with disabilities:	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
Not applicable:	<input type="checkbox"/>

**4B-4. Compare the number of RRH units available to serve any population from the 2014 and 2015 HIC.**

	2014	2015	Difference
RRH units available to serve any population in the HIC:	612	931	319

**4B-5. Are any new proposed project applications requesting \$200,000 or more in funding for housing rehabilitation or new construction?** No

**4B-6. If "Yes" in Questions 4B-5, then describe the activities that the project(s) will undertake to ensure that employment, training and other economic opportunities are directed to low or very low income persons to comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (Section 3) and HUD's implementing rules at 24 CFR part 135?  
 (limit 1000 characters)**

Not Applicable

**4B-7. Is the CoC requesting to designate one or more of its SSO or TH projects to serve families with children and youth defined as homeless under other Federal statutes?** No

**4B-7a. If "Yes" in Question 4B-7, describe how the use of grant funds to serve such persons is of equal or greater priority than serving persons defined as homeless in accordance with 24 CFR 578.89. Description must include whether or not this is listed as a priority in the Consolidated Plan(s) and its CoC strategic plan goals. CoCs must attach the list of projects that would be serving this population (up to 10 percent of CoC total award) and the applicable portions of the Consolidated Plan. (limit 2500 characters)**

Not Applicable

**4B-8. Has the project been affected by a major disaster, as declared by President Obama under Title IV of the Robert T. Stafford Act in the 12 months prior to the opening of the FY 2015 CoC Program Competition?** No

**4B-8a. If "Yes" in Question 4B-8, describe the impact of the natural disaster on specific projects in the CoC and how this affected the CoC's ability to address homelessness and provide the necessary reporting to HUD. (limit 1500 characters)**

Not Applicable

**4B-9. Did the CoC or any of its CoC program recipients/subrecipients request technical assistance from HUD in the past two years (since the submission of the FY 2012 application)? This response does not affect the scoring of this application.** Yes

**4B-9a. If "Yes" to Question 4B-9, check the box(es) for which technical assistance was requested.**

This response does not affect the scoring of this application.

CoC Governance:	<input type="checkbox"/>
CoC Systems Performance Measurement:	<input type="checkbox"/>
Coordinated Entry:	<input checked="" type="checkbox"/>
Data reporting and data analysis:	<input type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Homeless subpopulations targeted by Opening Doors: veterans, chronic, children and families, and unaccompanied youth:	<input type="checkbox"/>
Maximizing the use of mainstream resources:	<input type="checkbox"/>
Retooling transitional housing:	<input type="checkbox"/>
Rapid re-housing:	<input type="checkbox"/>
Under-performing program recipient, subrecipient or project:	<input type="checkbox"/>
	<input type="checkbox"/>
Not applicable:	<input type="checkbox"/>

**4B-9b. If TA was received, indicate the type(s) of TA received, using the categories listed in 4B-9a, the month and year it was received and then indicate the value of the TA to the CoC/recipient/subrecipient involved given the local conditions at the time, with 5 being the highest value and a 1 indicating no value.**

This response does not affect the scoring of this application.

Type of Technical Assistance Received	Date Received	Rate the Value of the Technical Assistance
HMIS	07/01/2012	3
HMIS	05/01/2013	3
Coordinated Entry	05/01/2013	3



## 4C. Attachments

**Instructions:**

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

For required attachments related to rejected projects, if the CoC did not reject any projects then attach a document that says "Does Not Apply".

Document Type	Required?	Document Description	Date Attached
01. 2015 CoC Consolidated Application: Evidence of the CoC's Communication to Rejected Projects	Yes	Communication to ...	11/16/2015
02. 2015 CoC Consolidated Application: Public Posting Evidence	Yes	2015 CoC Consolid...	11/18/2015
03. CoC Rating and Review Procedure	Yes	CoC Rating and Re...	11/16/2015
04. CoC's Rating and Review Procedure: Public Posting Evidence	Yes	CoC Ranking and R...	11/17/2015
05. CoCs Process for Reallocating	Yes	CoC Process for R...	11/16/2015
06. CoC's Governance Charter	Yes	CoC Governance Ch...	11/17/2015
07. HMIS Policy and Procedures Manual	Yes	HMIS Policy and P...	11/17/2015
08. Applicable Sections of Con Plan to Serving Persons Defined as Homeless Under Other Fed Statutes	No		
09. PHA Administration Plan (Applicable Section(s) Only)	Yes	PHA Administratio...	11/17/2015
10. CoC-HMIS MOU (if referenced in the CoC's Governance Charter)	No	HMIS Governance C...	11/17/2015
11. CoC Written Standards for Order of Priority	No		
12. Project List to Serve Persons Defined as Homeless under Other Federal Statutes	No		
13. Other	No		
14. Other	No		
15. Other	No		

## **Attachment Details**

**Document Description:** Communication to Rejected Projects

## **Attachment Details**

**Document Description:** 2015 CoC Consolidated Application: Public Posting Evidence

## **Attachment Details**

**Document Description:** CoC Rating and Review Procedure

## **Attachment Details**

**Document Description:** CoC Ranking and Review Posting

## **Attachment Details**

**Document Description:** CoC Process for Reallocating

## **Attachment Details**

**Document Description:** CoC Governance Charter

## **Attachment Details**

**Document Description:** HMIS Policy and Procedure Manual

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:** PHA Administration Plan

## **Attachment Details**

**Document Description:** HMIS Governance Charter

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:**

## Attachment Details

**Document Description:**

## Attachment Details

**Document Description:**

## Submission Summary

Page	Last Updated
<b>1A. Identification</b>	11/13/2015
<b>1B. CoC Engagement</b>	11/19/2015
<b>1C. Coordination</b>	11/18/2015
<b>1D. CoC Discharge Planning</b>	11/19/2015
<b>1E. Coordinated Assessment</b>	11/18/2015
<b>1F. Project Review</b>	11/17/2015
<b>1G. Addressing Project Capacity</b>	11/17/2015
<b>2A. HMIS Implementation</b>	11/16/2015
<b>2B. HMIS Funding Sources</b>	11/18/2015
<b>2C. HMIS Beds</b>	11/17/2015
<b>2D. HMIS Data Quality</b>	11/16/2015
<b>2E. Sheltered PIT</b>	11/17/2015
<b>2F. Sheltered Data - Methods</b>	11/18/2015
<b>2G. Sheltered Data - Quality</b>	11/16/2015
<b>2H. Unsheltered PIT</b>	11/17/2015
<b>2I. Unsheltered Data - Methods</b>	11/19/2015
<b>2J. Unsheltered Data - Quality</b>	11/16/2015
<b>3A. System Performance</b>	11/19/2015
<b>3B. Objective 1</b>	11/18/2015
<b>3B. Objective 2</b>	11/19/2015
<b>3B. Objective 3</b>	11/18/2015
<b>4A. Benefits</b>	11/19/2015
<b>4B. Additional Policies</b>	11/17/2015
<b>4C. Attachments</b>	11/18/2015
<b>Submission Summary</b>	No Input Required



# CITY OF PHILADELPHIA

OFFICE OF SUPPORTIVE HOUSING  
1401 JFK Boulevard - 10th Flr.  
Philadelphia, PA 19102  
(215) 686-7106  
FAX (215) 686-7126  
marie.nahikian@phila.gov

MARIE S. NAHIKIAN - DIRECTOR  
DEPUTY MANAGING DIRECTOR - SPECIAL NEEDS HOUSING

**November 5, 2015**

**Casey O'Donnell  
President & CEO  
Impact Services Corporation  
1952 E. Allegheny Avenue  
Philadelphia, PA 19134**

**RE: 2015 HUD Continuum of Care Request for Proposals for New Projects –  
Office of Supportive Housing**

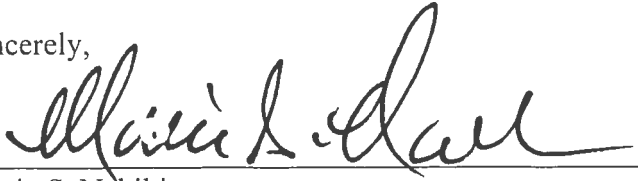
Project Name: Impact Senior Veterans Tiny Houses  
3230 CStreet  
Philadelphia, PA 19134

**Dear Ms. O'Donnell:**

We regret to inform you that the project proposal submitted by Impact Services Corporation in response to the City of Philadelphia's Office of Supportive Housing (OSH) 2015 HUD Continuum of Care Request for Proposals for New Projects (RFP) was not recommended for funding in the 2015 Continuum of Care competition. Impact Services Corporation request \$979,850 for project-based rental assistance, supportive services, and administration costs. The CoC Board determined that given the proposed construction timeline and the absence of committed development funding sources, the project is not yet viable for a commitment of operating subsidies.

Following the submission of the HUD CoC Consolidated Application on November 19, 2015, OSH staff is available to meet with you to discuss application strengths and deficiencies. If you are interested, please contact Cecilia Jones at 215-686-7165 to schedule a time to meet.

Sincerely,

A handwritten signature in cursive script, appearing to read "Marie S. Nahikian". The signature is written in black ink and is positioned above a horizontal line.

Marie S. Nahikian  
Co-Chair, Philadelphia CoC Board

11-5-15

Date



# CITY OF PHILADELPHIA

OFFICE OF SUPPORTIVE HOUSING  
1401 JFK Boulevard - 10th Flr.  
Philadelphia, PA 19102  
(215) 686-7106  
FAX (215) 686-7126  
marie.nahikian@phila.gov

MARIE S. NAHIKIAN - DIRECTOR  
DEPUTY MANAGING DIRECTOR - SPECIAL NEEDS HOUSING

November 5, 2015

**Thomas L. Bailey**  
Vice President, Finance  
Horizon House, Inc.  
120 South 30<sup>th</sup> Street  
Philadelphia, PA 19104

**RE: Notification of Rejection of Project**

Project Name: Supports to Achieve Self Sufficiency (SASS)  
120 South 30<sup>th</sup> Street

Dear **Mr. Bailey**:

This correspondence is to inform you that Supports to Achieve Self Sufficiency (SASS), the renewal transitional housing project submitted by Horizon House for \$351,475 in the 2015 Continuum of Care competition was recommended for reallocation to a new permanent supportive housing project serving 20 men and women experiencing chronic homelessness.

As required in the HUD Notice of Funding Availability for the 2015 Continuum of Care competition <https://www.hudexchange.info/resources/documents/Revised-FY-2015-CoC-Program-NOFA.pdf>, the CoC must notify any project that is rejected in the local competition, with an explanation for the decision to reject the project. Per HUD, "project applicants whose project was rejected may appeal the local CoC competition decision to HUD if the project applicant believes it was denied the opportunity to participate in the local CoC planning process in a reasonable manner by submitting a Solo Application in e-snaps directly to HUD prior to the application deadline of 7:59:59 p.m. on November 20, 2015." HUD requires that this letter, which is the CoC's notification of rejection of the project, be attached to the Solo Application.

For additional details about the appeals process, please review Section X in the NOFA, pages 57-65.



Sincerely,



Marie S. Nahikian  
Co-Chair, Philadelphia CoC Board

11-5-15  
Date



Steve Culbertson  
Co-Chair, Philadelphia CoC Board

11/5/15  
Date



# CITY OF PHILADELPHIA

OFFICE OF SUPPORTIVE HOUSING  
1401 JFK Boulevard - 10th Flr.  
Philadelphia, PA 19102  
(215) 686-7106  
FAX (215) 686-7126  
marie.nahikian@phila.gov

MARIE S. NAHIKIAN - DIRECTOR  
DEPUTY MANAGING DIRECTOR - SPECIAL NEEDS HOUSING

**November 5, 2015**

**Dr. Josette Anaya  
Overington House  
1528-30 Overington Street  
Philadelphia, PA 19124**

**RE: Notification of Rejection of Project**

Dear **Dr Anaya**:

We regret to inform you that the renewal project submitted by Overington House for \$225,959 in the 2015 HUD Continuum of Care (CoC) competition was not recommended for funding by the CoC Board of Directors on November 5, 2015. This means that HUD funding will no longer be available beginning September 1, 2016.

In the local renewal competition conducted in May 2015 in preparation for the 2015 HUD CoC application, Overington House's project scored an average of 51 out of 105 points. Each project requesting renewal funding is reviewed by 5 independent volunteer reviewers.

Points are given in accordance with HUD and local performance standards. At a mandatory meeting for renewing grantees held on April 27, 2015, the Office of Supportive Housing reviewed and distributed the renewal application along with the scoring tool that is provided to each reviewer. (Please see attached)

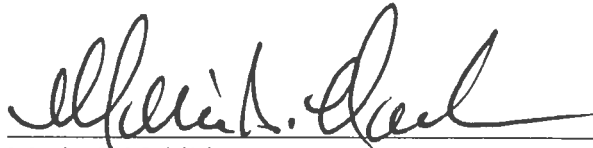
Scores below an average of 70 points mean that a project is deemed underperforming, as indicated in the letter sent to Overington House on August 11, 2015 (attached). In the 2014 HUD CoC competition last year, Overington House's proposal scored an average of 54 points. The CoC's Policy for Underperforming Projects specifies that "if, for any reason, the Advisory Committee and Board decide that the program has not improved, and then a recommendation will be made to terminate funding for the upcoming year."

Because of low scores in the competition, and as a result of participant complaints, OSH made site visits to Overington House beginning in January 2015 and most recently, in September 2015. In this most recent visit, staff observed facility and food issues, as well as participant complaints regarding the conditions and the program.

As required in the HUD Notice of Funding Availability for the 2015 Continuum of Care competition <https://www.hudexchange.info/resources/documents/Revised-FY-2015-CoC-Program-NOFA.pdf>, the CoC must notify any project that is rejected in the local competition, with an explanation for the decision to reject the project. Per HUD, “project applicants whose project was rejected may appeal the local CoC competition decision to HUD if the project applicant believes it was denied the opportunity to participate in the local CoC planning process in a reasonable manner by submitting a Solo Application in e-snaps directly to HUD prior to the application deadline of 7:59:59 p.m. on November 20, 2015.” HUD requires that this letter, which is the CoC’s notification of rejection of the project, be attached to the Solo Application.

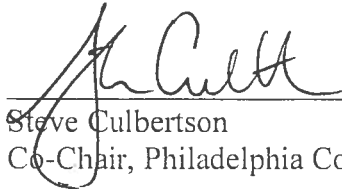
For additional detail about the appeals process, please review Section X in the NOFA, pages 57-65.

Sincerely,



Marie S. Nahikian  
Co-Chair, Philadelphia CoC Board

11-5-15  
Date



Steve Culbertson  
Co-Chair, Philadelphia CoC Board

11/5/15  
Date



# CITY OF PHILADELPHIA

OFFICE OF SUPPORTIVE HOUSING  
1401 JFK Boulevard - 10th Flr.  
Philadelphia, PA 19102  
(215) 686-7106  
FAX (215) 686-7126  
marie.nahikian@phila.gov

MARIE S. NAHIKIAN - DIRECTOR  
DEPUTY MANAGING DIRECTOR - SPECIAL NEEDS HOUSING

August 11, 2015

Dr. Jousette Anaya  
Executive Director  
Overington House  
1528-30 Overington Street  
Philadelphia, PA 19124

RE: HUD 2015 Continuum of Care Renewal/Underperforming Project – Overington House

Dear Dr. Anaya:

This letter is to inform you the CoC Renewal Review Committee reviewed 2015 CoC Program renewal applications on June 10, 2015 and **Overington House received an average score of 51 out of 105 points**. In the 2014 renewal competition, Overington House received an average score of 54 points. Under the local Policy for Underperforming Renewal Projects, which is enclosed, projects that score 70 or below in two consecutive renewal competitions are subject to a process that includes site visits, development of an action plan, and potential defunding if improvement is not demonstrated. **Because Overington House received below 70 points for the second consecutive year, it impacts this year's competition since HUD may make cuts based on ranking. Also, note that this score may place this project in Tier 2.**

Please note that 1 point was deducted from the score because no staff participated in the January 2015 PIT count and 10 points were deducted due to late submission. The CoC Renewal Application was due on Friday, May 8, 2015 and was received on Monday, May 11, 2015.

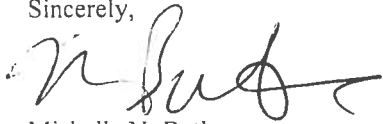
The reviewer's scoring the Overington House renewal application noted the following issues and areas for improvement:

- **Project Description and participant information:** Project description did not include information on projected outcomes. Project participant chart did not match the program description and only listed 17 children, but the program description stated project could serve up to 26 children.
- **Case Study:** The program participant's first name was disclosed in the response when the instructions state participant names should be protected. Response did not include much information about the efforts employed by the provider to assist the program participant in resolving challenges.
- **Housing First:** No explanation was provided as to how your program is moving toward a "House First" approach and/or impediments to this transition.
- **Residence Prior to Program Entry:** Only 37% of participants came from literally homeless situations.

- **Change in Cash Income:** Did not complete information on number of adults with earned (employment) income. Listed 24 total adults, but data quality chart states there were 30 adult records. 0% of adults had more non-employment income. Local standards were not met and no explanation was provided.
- **Housing Stability:** Although there were reportedly 41 leavers, the chart showing the destination of leavers was not completed, therefore unable to tell where the 41 leavers went or score this section.
- **Overall:** Data missing or incorrect in some charts. Explanations were not provided for the sections where the standard wasn't met. Ensuring responses are correct and complete would result in a higher score.

If you have questions or concerns, please call me at (215) 686-7105.

Sincerely,



Michelle N. Butler  
Director, Continuum Care Planning

Enclosure



# CITY OF PHILADELPHIA

OFFICE OF SUPPORTIVE HOUSING  
1401 JFK Boulevard - 10th Flr.  
Philadelphia, PA 19102  
(215) 686-7106  
FAX (215) 686-7126  
marie.nahikian@phila.gov

MARIE S. NAHIKIAN - DIRECTOR  
DEPUTY MANAGING DIRECTOR - SPECIAL NEEDS HOUSING

**November 5, 2015**

**Tim Williams**  
**Executive Director**  
**Veterans Multi-Service Center**  
**213 North 4<sup>th</sup> Street**  
**Philadelphia, PA 19106**

**RE: 2015 HUD Continuum of Care Request for Proposals for New Projects –  
Office of Supportive Housing**

Project Name: Edison 64 Veterans Community  
700 West Somerset Street  
Philadelphia, PA 19133

**Dear Mr. Williams:**

We regret to inform you that the project proposal submitted by Veterans Multi-Service Center in response to the City of Philadelphia's Office of Supportive Housing (OSH) 2015 HUD Continuum of Care Request for Proposals for New Projects was not recommended for funding in the 2015 Continuum of Care competition. Veterans Multi-Service Center requested \$403,595.30 for rehabilitation, supportive services, operating, and administration costs. The project proposal scored too low to be included in the CoC Consolidated Application based on the funding available for new projects.

Following the submission of the HUD Consolidated CoC application on November 19, 2015, OSH staff is available to meet with you to discuss application strengths and deficiencies. If you are interested, please contact Cecilia Jones at 215-686-7165 to schedule a time to meet.

Sincerely,



Marie S. Nahikian  
Co-Chair, Philadelphia CoC Board

11-5-15  
Date



Steve Culbertson  
Co-Chair, Philadelphia CoC Board

11/5/15  
Date



# CITY OF PHILADELPHIA

OFFICE OF SUPPORTIVE HOUSING  
1401 JFK Boulevard - 10th Flr.  
Philadelphia, PA 19102  
(215) 686-7106  
FAX (215) 686-7126  
marie.nahikian@phila.gov

MARIE S. NAHIKIAN - DIRECTOR  
DEPUTY MANAGING DIRECTOR - SPECIAL NEEDS HOUSING

November 5, 2015

**Angelo Sgro**  
**Interim CEO**  
**Bethesda Project**  
**1630 South Street**  
**Philadelphia, PA 19146**

**RE: 2015 HUD Continuum of Care Request for Proposals for New Projects –  
Office of Supportive Housing**

Project Name: Beacon at the Beury  
3701 North Broad Street  
Philadelphia, PA 19140

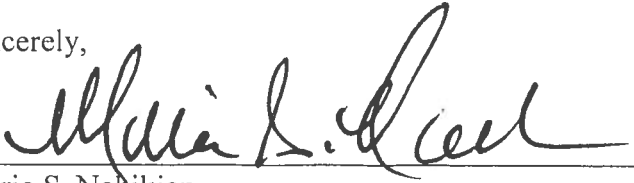
Dear **Mr. Sgro**:

We regret to inform you that the project proposal submitted by Bethesda Project in response to the City of Philadelphia's Office of Supportive Housing (OSH) 2015 HUD Continuum of Care Request for Proposals for New Projects (RFP) was not recommended for funding in the 2015 Continuum of Care competition. Bethesda Project request \$2,308,795 for project-based rental assistance and administration costs. The CoC Board determined that given the proposed construction timeline and the absence of committed development funding sources, the project is not yet viable for a commitment of operating subsidies.

Following the submission of the HUD CoC Consolidated Application on November 19, 2015, OSH staff is available to meet with you to discuss application strengths and deficiencies. If you are interested, please contact Cecilia Jones at 215-686-7165 to schedule a time to meet.



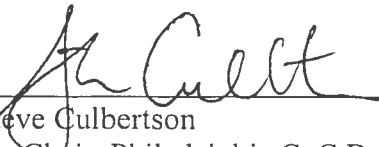
Sincerely,



Marie S. Nahikian  
Co-Chair, Philadelphia CoC Board

11-5-15

Date



Steve Culbertson  
Co-Chair, Philadelphia CoC Board

11/5/15

Date



# CITY OF PHILADELPHIA

OFFICE OF SUPPORTIVE HOUSING  
1401 JFK Boulevard - 10th Flr.  
Philadelphia, PA 19102  
(215) 686-7106  
FAX (215) 686-7126  
marie.nahikian@phila.gov

MARIE S. NAHIKIAN - DIRECTOR  
DEPUTY MANAGING DIRECTOR - SPECIAL NEEDS HOUSING

November 5, 2015

**Mr. Walter Kubiak**  
**Executive Director**  
**1260 Housing Development Corporation**  
**2042-48 Arch Street, 2<sup>nd</sup> Floor**  
**Philadelphia, PA 19106**

**RE: Notification of Rejection of Project**

Project Name: ARCH

Dear Mr. Kubiak:

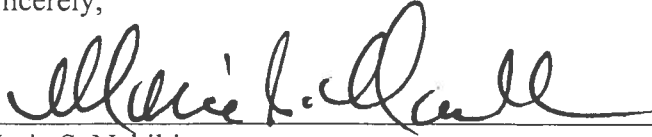
This correspondence is to inform you that the renewal project application submitted by 1260 Housing Development Corporation for \$91,800 in rental assistance subsidies for the 2015 HUD Continuum of Care (CoC) competition was recommended for reallocation to a new project. While the project served 10 individuals with serious mental illness, the project was not dedicated to serving individuals experiencing chronic homelessness.

The CoC Board has recommended that these 10 tenant-based subsidies be reallocated to a new project exclusively serving the most vulnerable individuals experiencing chronic homelessness.

As required in the HUD Notice of Funding Availability for the 2015 Continuum of Care competition <https://www.hudexchange.info/resources/documents/Revised-FY-2015-CoC-Program-NOFA.pdf>, the CoC must notify any project that is rejected in the local competition, with an explanation for the decision to reject the project. Per HUD, "project applicants whose project was rejected may appeal the local CoC competition decision to HUD if the project applicant believes it was denied the opportunity to participate in the local CoC planning process in a reasonable manner by submitting a Solo Application in e-snaps directly to HUD prior to the application deadline of 7:59:59 p.m. on November 20, 2015." HUD requires that this letter, which is the CoC's notification of rejection of the project, be attached to the Solo Application.

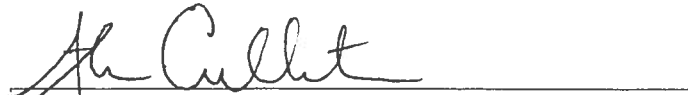
For additional detail about the appeals process, please review Section X in the NOFA, pages 57-65.

Sincerely,



Marie S. Nahikian  
Co-Chair, Philadelphia CoC Board

11-5-15  
Date



Steve Culbertson  
Co-Chair, Philadelphia CoC Board

11/5/15  
Date



# CITY OF PHILADELPHIA

OFFICE OF SUPPORTIVE HOUSING  
1401 JFK Boulevard - 10th Flr.  
Philadelphia, PA 19102  
(215) 686-7106  
FAX (215) 686-7126  
marie.nahikian@phila.gov

MARIE S. NAHIKIAN - DIRECTOR  
DEPUTY MANAGING DIRECTOR - SPECIAL NEEDS HOUSING

**November 5, 2015**

**Diane Williams**  
**Executive Director**  
**Chelten Christian Crusade for All People (CCC4AP)**  
**605 East Chelten Avenue**  
**Philadelphia, PA 19144**

**RE: 2015 HUD Continuum of Care Request for Proposals for New Projects –  
Office of Supportive Housing**

Project Name: A New Start With Every Resident (ANSWER)  
609 East Chelten Avenue, Philadelphia, PA  
3625 North 22<sup>nd</sup> Street, Philadelphia, PA

**Dear Ms. Williams:**

We regret to inform you that the project proposal submitted by Chelten Christian Crusade for All People (CCC4AP) in response to the City of Philadelphia's Office of Supportive Housing (OSH) 2015 HUD Continuum of Care (CoC) Request for Proposals for New Projects was not recommended for funding in the 2015 Continuum of Care competition. Chelten Christian Crusade for All People requested \$969,446.75 for project-based rental assistance, acquisition, supportive services, and administration costs. The project proposal scored too low to be included in the CoC Consolidated Application based on the funding available for new projects.

Following the submission of the HUD Consolidated CoC application on Thursday, November 19, 2015, OSH staff is available to meet with you to discuss application strengths and deficiencies. If you are interested, please contact Cecilia Jones at 215-686-7165 to schedule a time to meet.

Sincerely,



Marie S. Nahikian  
Co-Chair, Philadelphia CoC Board

11-5-15

Date



Steve Culbertson  
Co-Chair, Philadelphia CoC Board

4/5/15

Date



# CITY OF PHILADELPHIA

OFFICE OF SUPPORTIVE HOUSING  
1401 JFK Boulevard - 10th Flr.  
Philadelphia, PA 19102  
(215) 686-7106  
FAX (215) 686-7126  
marie.nahikian@phila.gov

MARIE S. NAHIKIAN - DIRECTOR  
DEPUTY MANAGING DIRECTOR - SPECIAL NEEDS HOUSING

November 5, 2015

**Diana McWilliams**  
Executive Director  
Families Forward Philadelphia  
111 N. 49<sup>th</sup> Street  
Philadelphia, PA 19139

**RE: 2015 HUD Continuum of Care Request for Proposals for New Projects –  
Office of Supportive Housing**

Project Name: The Stability Project  
111 N. 49<sup>th</sup> Street

Dear **Ms. McWilliams**:

We regret to inform you that the project proposal submitted by Families Forward Philadelphia in response to the City of Philadelphia's Office of Supportive Housing (OSH) 2015 HUD Continuum of Care (CoC) Request for Proposals for New Projects was not recommended for funding in the 2015 Continuum of Care competition. Families Forward Philadelphia requested \$2,460,733 for leasing, supportive services, operating, and administration costs. The project did not propose to serve one of the Continuum of Care Board's highest priority populations.


Following the submission of the HUD CoC Consolidated Application on November 19, 2015, OSH staff is available to meet with you to discuss application strengths and deficiencies. If you are interested, please contact Cecilia Jones at 215-686-7165 to schedule a time to meet.

Sincerely,



Marie S. Nahikian  
Co-Chair, Philadelphia CoC Board

11-5-15  
Date



Steven Culbertson  
Co-Chair, Philadelphia CoC Board

11/5/15  
Date



Supportive Housing

Topics Businesses Residents Visitors Government



Prevention

Emergency Services

Long-Term Housing

Phila > Office of Supportive Housing > About Us > Continuum of Care COC

## Continuum of Care COC

### About Us

Mission

» Continuum of Care COC

Standards and Policies

FAQ

Contact Us

Executive Staff

Emergency Solutions Grant

The Philadelphia Continuum of Care (CoC) Board is the primary decision making body of the CoC and is responsible for approval of all CoC policies, procedures, and funding decisions. Decisions are made with input from the CoC Advisory Committee, Standing Subcommittees, and the Office of Supportive Housing.

The CoC Board must represent the relevant organizations and projects serving homeless subpopulations, such as persons with substance use disorders; persons with HIV/AIDS; veterans; the chronically homeless; families with children; unaccompanied youth; the seriously mentally ill; and victims of domestic violence. One board member may represent the interests of more than one homeless subpopulation, and the board must represent all subpopulations within the CoC to the extent that someone is available and willing to represent that subpopulation to the board.

The Philadelphia CoC Board consists of 17 members, of which 15 are voting members and 2 are non-voting ex-officio members. Below is a copy of the 2014-2015 Board Roster, 2014-2015 CoC Advisory Committee, and a copy of the Board Meeting minutes from March 18, 2015. If you have any questions, feel free to contact Roberta Cancellier, Deputy Director, 215-686-7105 or Sara Pagni, CoC Program Manager, 215-686-7159

- [2015 Board Meeting Minutes](#)
- [2014 Philadelphia CoC Homeless Point in Time Count](#)
- [2014 Philadelphia CoC Housing Inventory Chart](#)

### Continuum of Care Forms

- [Philadelphia CoC - Documentation of Homelessness Form »](#)
- [Philadelphia CoC - Instructions- Documentating Chronic Homelessness »](#)
- [Philadelphia CoC - Verification of Disability Form »](#)

### Continuum of Care Funding

OSH serves as the Collaborative Applicant for Continuum of Care (CoC) funding through U.S. Department of Housing and Urban Development. In 2013, Philadelphia applied for \$29 million in CoC funding to support 107 homeless assistance projects. If you would like to view an individual project's application for funding, please contact [Roberta Cancellier](#). If you have a disability and require an accommodation in order to review, please contact [Roberta Cancellier](#), Deputy Director at 215-686-7105.

Attached for your review are the following documents:

- [FY 2015 CoC Application](#)
- [FY 2015 CoC Program Process for Reallocating](#)
- [FY 2015 CoC Rating and Review Procedure](#)
- [FY 2015 CoC Priority Listing](#)

### Philly 311

### Immediate Assistance

### Weather Code Information

### Family/Women Intake Relocation

### Office of Supportive Housing

Prevention  
Emergency Services  
Long-Term Housing  
About Us

### Topics

Arts & Culture  
Education  
Employment  
Environment  
Health  
Housing  
Neighborhoods  
Public Safety  
Recreation  
Transportation & Utilities  
Urban Development

### People We Serve

Businesses  
Residents  
Visitors

### Government

Mayor's Office  
City Council  
Courts  
District Attorney  
Sheriff

### Contact

311  
Phone Directory  
Language Assistance



Philadelphia Continuum of Care (PA-500)  
2015 CoC Program Rating and Review Process

**Project Rating and Review Process:**

**Renewal Projects**

In order to be considered for inclusion in Philadelphia's Continuum of Care Consolidated Application, local agencies must submit the 2015 Continuum of Care Program Renewals Application. Proposals received are first reviewed by City staff to establish whether they pass threshold requirements. All proposals that pass threshold requirements are reviewed by a local review committee, and, if selected, ranked for inclusion in Philadelphia's Consolidated Application.

The CoC Program Renewals Review Committee is a volunteer panel convened to review and rank project proposals. Members of the Review Committee are responsible for the following:

- Independently review and score proposals using the 2015 CoC Renewal Project Evaluation Tool found in Appendix A;
- Provide recommendations on whether a project should be included in the CoC Consolidated Application and how it should be ranked among other projects.

Individual reviewer scores are averaged, which forms the basis for preliminary ranking within the local priorities.

**Proposal Evaluation and Scoring**

All renewal project applications, except for first time renewals, are reviewed and scored by 5 individuals using the evaluation tool found in Appendix A. The reviewer scores are averaged, which forms the basis for preliminary ranking within the local priorities. The evaluation tool was developed by members of the CoC Quality Improvement and Evaluation Subcommittee.

In addition to the evaluation tool, proposals earn 1 additional point if at least two members from the applicant's organization participated in the 2015 unsheltered PIT count. *Ten points are removed from proposals received after the submission deadline.*

Based on the CoC's Underperforming Policy, a project is classified as "underperforming" if the renewal project application receives a score of 70 or below. These projects are provided with additional technical assistance to improve their performance. In 2015, two (2) permanent supportive housing projects and two (2) transitional housing projects received a score below 70 points and classified as underperforming.

**New Projects**

In order to be considered for inclusion in Philadelphia's Continuum of Care Consolidated Application, local agencies must respond to the RFP for new projects. Proposals received are first reviewed by City staff to establish whether they pass threshold requirements. All proposals that pass threshold requirements are then reviewed and scored by 5 individuals using the evaluation tool found in Appendix B. Individual reviewer scores are averaged, which forms the basis for preliminary ranking within the local priorities.

**Conflicts of Interest**

Every effort is made to avoid conflict, or the appearance thereof, when assigning proposals to reviewers. Before reviewers score proposals, they are asked to determine whether a conflict of interest exists with any application that has been assigned to them. If a conflict or the appearance of a conflict exists, the proposal will be assigned to another reviewer and a replacement proposal will be provided.

Philadelphia Continuum of Care (PA-500)  
2015 CoC Program Rating and Review Process

A conflict of interest can be defined as: an actual or perceived interest by a review committee member in an action which results or appears to result in personal, organizational, or professional gain. This may involve a direct or indirect financial or other interest in a decision of the planning body. Examples of possible conflicts of interest include cases where a reviewer:

- Is employed or has a formal association with an agency that has submitted an application;
- Has recently served as a consultant for an applicant agency;
- Is named as a potential consultant or subcontractor in the application; or
- Has extensive knowledge about the application or proposed project and is unable to objectively review the application.

### **Confidentiality**

Adherence to confidentiality is critical to the integrity of the review process and the protection of reviewers evaluating proposals. All reviewers must agree to abide by the following confidentiality requirements before, during, and after the review process:

- All information related to the proposals should be kept in strict confidence;
- Impressions or judgments concerning the proposals are not to be discussed or shared with anyone prior to, during, or after the review committee's deliberations (exceptions: discussions with other review committee members during committee deliberations and staff discussions during CoC Advisory Committee and CoC Board meetings);
- The proposals, as well as the ideas, concepts, methods, or techniques included in the proposals are to be considered proprietary, and all rights thereby implied are to be respected;
- Proposals, in part or whole, are not to be photocopied; and
- Questions about any specific proposals are not to be directed to the applicant organization, or to a consultant who assisted in the preparation of the application.

Reviewers must adhere to the following requirements during and after the Review Committee meeting:

- Statements and notes of the reviewers should not be shared with anyone outside the review committee;
- Discussions concerning any specific application are to be confined to the review committee meeting room;
- Proceedings of the review committee are to be kept in strict confidence; and
- Proposals and review materials are to be left with the Office of Supportive Housing (Collaborative Applicant) staff at the conclusion of the review session.

### **Philadelphia Ranking Order**

Projects are grouped according to program type (PH, SH, and TH) and are ranked according to the average score received during the proposal review process. The Philadelphia CoC has a long-standing commitment to rank permanent housing renewal projects higher than safe haven and transitional housing renewal projects, with the exception of low-scoring permanent housing projects. Because the primary basis for reviewing and scoring renewal proposals is performance data from the Annual Performance Reports (APRs), first time renewal projects not been operating long enough to have a year of performance data are not reviewed by the Renewals Review Committee. These projects are ranked below the reviewed renewal PH projects, but above safe haven renewal projects.

Philadelphia Continuum of Care (PA-500)  
2015 CoC Program Rating and Review Process

**Ranking Approval Process:**

On Monday, November 2, 2015, the CoC Advisory Committee endorsed the following project ranking order and on Thursday, November 5, 2015, the CoC Board approved the following ranking order:

Tier 1:

1. Renewal permanent housing (PH) projects scoring between 100-80 points
2. First Time Renewal PH projects not operating long enough to have a year of performance data
3. New permanent supportive housing (PSH) project voluntarily reallocating from a TH project
4. Renewal safe haven (SH) projects
5. Renewal transitional housing (TH) projects except for the lowest scoring TH project serving youth
6. Renewal HMIS project (partial amount)

Tier 2:

7. Remaining HMIS project amount
8. Lowest scoring renewal TH project exclusively serving youth
9. Renewal PH projects that scored 79 or below
10. New rapid re-housing (RRH) project created through reallocation funds
11. New PSH project created through bonus funds
12. New RRH projects created through bonus funds

On Thursday, November 12, 2015 the Collaborative Applicant was notified of the ability to shift more supportive service costs to mainstream resources. This provided the opportunity to move a renewal PSH project from Tier 2 to Tier 1 use reallocated funds instead of bonus funds to create a new PSH project.

The revised project ranking order is as follows:

Tier 1:

1. Renewal permanent housing (PH) projects scoring between 100-80 points
2. First Time Renewal PH projects not operating long enough to have a year of performance data
3. New permanent supportive housing (PSH) project voluntarily reallocating from a TH project
4. Renewal safe haven (SH) projects
5. Renewal transitional housing (TH) projects except for the lowest scoring TH project serving youth
6. Renewal PSH project with no CoC funded supportive service costs scoring below 79
7. Renewal HMIS project (partial amount)

Tier 2:

8. Remaining HMIS project amount
9. Lowest scoring renewal TH project exclusively serving youth
10. Renewal PH projects that scored 79 or below
11. New PSH project created through reallocation funds
12. New rapid re-housing (RRH) project created through reallocation funds
13. New RRH projects created through bonus funds

On Saturday, November 14, 2015, the CoC Advisory Committee was notified of this change via email and the CoC Board approved the revised ranking order via email on Tuesday, November 17, 2015.

All renewal project applications are reviewed and scored by 5 individuals using the following evaluation tool:

	<b>Scoring Criteria</b>		<b>Max. Points</b>
Project Description and Participant Information	Project description clearly describes the target population(s) to be served, the plan for addressing the identified needs/issues of the CoC target population(s), projected outcome(s), supportive services provided and coordination with other source(s)/partner(s). The project participant's chart is fully consistent with the description. If not, an explanation was provided.	8-10	10
	Project description provides a brief description of the population served and services provided. The project participant's chart is somewhat consistent with the description.	5-7	
	Project description is lacking in content and does not present a clear picture of the project for reviewer. The project participant's chart is not consistent with the description.	0-4	
Case Study	One case study of client challenges was provided. The individual described is representative of the target population. The case clearly illustrates efforts made by the housing and service providers to address the client's identified issues/needs. The outcome is clear.	8-10	10
	Case study briefly highlights efforts made by both the housing and service providers to address the client's identified issues/needs and client's outcomes are clear.	5-7	
	Case study is lacking in content and does not present a clear picture of client challenges and staff interventions.	0-4	
Housing First	Program selected "Yes" to all three statements.	5	5
	Program selected "Yes" to two of the statements.	3-4	
	Program selected "Yes" to one of the statements.	1-2	
	Program selected "No" to all three statements.	0	
Data Quality	Most of the data elements had 10% or less Don't Know/Refused and Missing Values and/or supplied sound explanation and plan to cure if the goal was not achieved.	8-10	10
	Only a few of the data elements had 10% or less Don't Know/Refused and Missing Values	5-7	
	None of the data elements had 10% or less Don't Know/Refused and Missing Values and/or there is no explanation for missing data.	0-4	
Unit Utilization Rates	Unit Utilization Rate is 90% or above for the 4 points in time.	8-10	10
	Unit Utilization Rate is 75 – 89% for 3-4 points in time.	5-7	
	Unit Utilization Rate is below 75% for 2-3 points in time.	0-4	

	<b>Scoring Criteria</b>		<b>Max. Points</b>
Residence Prior to Program Entry	Participants are coming from appropriate sources based on the program type. The majority of participants are coming from literally homeless situations.	5-10	10
	Participants come from eligible places based on the type of project (PH or TH). Some information is missing.	2-4	
	There is no consistency with the types of places where people are coming from; people appear to be coming from ineligible places (client owned or rental properties) or the percentage of those coming from “other”, “don’t know/refused” or “missing” is high.	0-1	
Change in Earned (Employment) Income	10% or more of all adults (Leavers and Stayers) have more earned income than at program entry.	5	5
	7-9% of all adults (Leavers and Stayers) have more earned income than at program entry. Explanation is sound	2-4	
	6% or below of all adults (Leavers and Stayers) have more earned income than at program entry. Poor explanation or no explanation is given.	0-1	
Change in Other Income	34% or more of all adults (Leavers and Stayers) have more non-employment income than at program entry.	5	5
	25-33% of all adults (Leavers and Stayers) have more non-employment income than at program entry. Explanation is sound.	2-4	
	24% or below of all adults (Leavers and Stayers) have more non-employment income than at program entry. Poor explanation or no explanation is given.	0-1	
Non-Cash Benefit Sources	At least 82% of participants are connected to at least one mainstream benefit. Based on the target population, the benefits attained by participants are appropriate.	8-10	10
	70% to 81% of participants are connected to at least one mainstream benefit. Based on the population served it is likely that more participants could be connected to additional benefits. Explanations, if provided, appear to be applicable.	5-7	
	Less than 70% of participants are connected to at least one mainstream benefit. Benefits don’t appear to be appropriate and/or there is not adequate connection to benefits based on the population served. No explanation is given.	0-4	

	<b>Scoring Criteria</b>		<b>Max. Points</b>
Housing Stability (PSH Only)	93% or more of participants (Leavers and Stayers) remain in the program at the end of the operating year or exit to a different permanent housing destination.	8-10	10
	81% - 92% of participants (Leavers and Stayers) remain in the program at the end of the operating year or exit to a different permanent housing destination.	5-7	
	80% or less of participants (Leavers and Stayers) remain in the program at the end of the operating year or exit to a different permanent housing destination.	0-4	
Destination (TH Only)	77% or more of all leavers exited to a permanent destination.	8-10	10
	65 - 76% of all leavers exited to a permanent destination.	5-7	
	64 % or less of all leavers exited to a permanent destination.	0-4	
Destination (Safe Haven Only)	55% or more of all leavers exited to a permanent destination.	8-10	10
	43-54% of all leavers exited to a permanent destination.	5-7	
	42% or less of all leavers exited to a permanent destination.	0-4	
BONUS – Prioritizing Households Most in Need	Up to 5 points may be awarded for the following: The proposal serves 50% of the priority target populations: chronically homeless individuals/families, veterans, youth (ages 24 and below) and/or victims of domestic violence. There is evidence that the project seeks to serve the individuals/families who are the longest time homeless and/or require the most intensive services.	0-5	5
Overall Responsiveness / Explanations and plans to address deficiencies	Very clear, complete proposal – easy to understand the program structure and population served. Data is complete and if there are narrative explanations, they are clear and convincing. If participants exited the program, most destinations are positive. Those who remained appeared to be on track for positive outcomes (same/increased income, connection to mainstream benefits).	11-15	15
	Fairly clear proposal. Complete with some details.	6-10	
	Proposal unclear, sections or responses missing, hard to understand program or population to be served.	0-5	
<b>TOTAL SCORE</b>			<b>105</b>

**2015 Federal Continuum of Care Program**  
**NEW PSH/RRH PROJECT PROPOSAL REVIEW INSTRUMENT**

**Score, Rank, and Overall Evaluation / Comments:**

This review tool is divided into 6 sections, each with its own point value. Please enter your score for each section on the lines below. Each section contains a series of questions to consider when scoring. Please read through all questions and assign a total score for that section based on your answers to the questions.

1. \_\_\_\_\_ Housing component: appropriateness and effectiveness (25 points maximum)
2. \_\_\_\_\_ Services component: appropriateness and effectiveness (20 points maximum)
3. \_\_\_\_\_ Experience of the applicant agency and other involved agencies (25 points maximum)
4. \_\_\_\_\_ Budget, financial resources, and leveraging (20 points maximum)
5. \_\_\_\_\_ Neighborhood Relations (2 points maximum)
6. \_\_\_\_\_ Responsiveness to RFP (8 points maximum)
- \_\_\_\_\_ **Total (100 points maximum)**

**1. Housing Component: Sections A & B**

[Maximum Score: 25 points                      Reviewer Score: \_\_\_\_\_]

- a. Does the applicant clearly and completely respond to *all* applicable content areas;
- b. How well does the applicant demonstrate an understanding of the housing needs of the target population, the neighborhoods and markets in which the project(s) will be located?
- c. How strong and reasonable are the methods used for determining type, amount, and duration of assistance (RRH uses the Sufficiency Assessment to create Self Sufficiency Plans and financial assistance not to exceed \$5,000 per household)?
- d. How appropriate is the proposed method of providing housing through the program (scattered-site or identified sites) for meeting participants' housing needs?
- e. How well will the proposed program meet participants' "community amenity" needs – housing in proximity to shopping, schools, public transportation, health care, recreation, social services, etc.?

**2. Services Component: Section C**

[Maximum Score: 20 points                      Reviewer Score: \_\_\_\_\_]

- a. How well does the applicant demonstrate an understanding of the service needs of the target population when they enter the program, and as they change over time?
- b. How well will the proposed services meet the needs of participants (consider types of services, how often/long they will be provided, location of services, transportation assistance, who/what agency is providing the services, who/if anyone is coordinating services received from multiple entities)
- c. How effective will the proposed services program be to serve the required population, (if PSH, chronically homeless individuals; if RRH, homeless individuals and/or families, including youth)?
- d. How effectively will the program, as described, assist participants in "increasing their incomes and maximizing their ability to live independently"?
- e. Does the applicant provide sufficient detail on the proposed supportive services partnerships and proposed coordination among the participating entities?

**3. Experience of the Applicant Agency and Other Involved Agencies: Section D**

[Maximum Score: 25 points                      Reviewer Score: \_\_\_\_\_]

- a. How *exceptional* and/or *extensive* is the organization’s experience [per RFP, 5 years providing services to homeless households (with disabilities, if PSH), 3 years providing housing and case management services, established partnerships, financial and administrative capacity, equal opportunity employer]; how *comprehensive* and *compelling* is the justification for why the applicant is appropriate entity to receive funding for the proposed project?
- b. How experienced is the applicant organization (and any other entities identified in the proposal) in providing housing and supportive services to homeless persons?
- c. How experienced is the applicant organization (and any other participating entities identified in the proposal) in providing housing and supportive services to the particular priority population to be served by this new program (consider length and type of experience they described, and measures of success if they were provided)?
- d. How well does the proposed program “fit” with the past / current experience of the applicant organization – a wholly new endeavor, an increase in capacity to serve a population already being served in this way, or an additional “next step” project to serve a population already being served but in a new way?
- e. Does the applicant organization have the capacity in terms of current and proposed staffing and workload to deliver the services as described in the proposal? Among other points, consider the information provided in the “HUD grant table”.
- f. What is the applicant’s track record in administering rental subsidies and carrying out projects in a timely manner? Does the applicant demonstrate ability to calculate annual income/tenant rent and work with landlords?
- g. How well does the applicant organization describe its responsibilities and the responsibilities of its partners in administering the proposed project (if applicable)

**4. Budget, Financial Resources, and Leveraging: Section E**

[Maximum Score: 20 points                      Reviewer Score: \_\_\_\_\_]

- a. Is the proposed budget *reasonable* for the level of services provided, based on the type of project, population served, and number of households to be served?
- b. Did the applicant provide *clear* and *accurate* calculations on Budget Forms Attachment (rental assistance uses FMR calculations; leasing does not exceed FMR calculations; supportive services does not exceed 20% of the total funding request)?
- c. Has the applicant secured commitments beyond the required 25% (projects approaching leverage/match of 150% are more competitive)? Is this level of additional cash more substantial than that of other proposals you have reviewed under this competition? If the cash has not been secured, is the explanation of the agency’s efforts sufficient to convince you that it will be secured in the future?
- d. Are there non-CoC program sources of services identified and secured that will be sufficient to meet participants’ services needs? (This is preferable, but only if the sources are secured or clearly will be secured.)
- e. How much of an impact will leveraged services, for which the agency has secured commitments, have on the effectiveness of the proposed program? Consider this particularly as it relates to projects that require rehabilitation of the property prior to utilizing the rental assistance/leasing/service funding. (more=better)



**5. Neighborhood Relations: Section B (if applicable)**

*(If Not Applicable, award the applicant an automatic 2 points.)*

[Maximum Score: 2 points                      Reviewer Score: \_\_\_\_\_]

- a. Does the applicant describe in an acceptable level of detail their “community relations efforts” in the neighborhood(s) where the proposed project would be located?
- b. Based on the information in the proposal, how effective was the process used to reach out to community residents and organizations?
- c. If community concerns were raised in this process, how is the applicant proposing that they be addressed or how have they been addressed?

**6. Responsiveness to RFP**

[Maximum Score: 10 points                      Reviewer Score: \_\_\_\_\_]

- a. How well did the applicant respond to the RFP? Was the response sufficiently detailed to allow you to adequately understand the proposed program?
- b. Based on written descriptions, how well does the applicant understand the population to be served – where they come from, what their housing and services needs are?
- c. How well do you feel the proposed program will meet the identified supportive services and housing needs of the participants? Is the project reasonable and achievable?

## **Philadelphia Continuum of Care (PA-500) 2015 CoC Process for Reallocating**

The Philadelphia CoC recognizes the importance of carefully evaluating the performance of existing CoC Program funded projects to determine how to best use available resources to end homelessness. In alignment with HUD's Policy Priorities for the 2015 CoC Program Competition, the Philadelphia CoC made decisions about resource allocation by considering the following items:

- a. Comprehensive review of projects;
- b. Maximizing the use of mainstream resources;
- c. Leveraging resources through partnerships;
- d. Reviewing the efficacy of transitional housing

After a thorough review of all renewal project applications, the Philadelphia CoC decided to take advantage of the opportunity to apply for new funding through partially or fully reallocating funds from existing projects. The reallocation of funds from projects that are underperforming, underutilized, or not cost effective is a strategic method to improve Philadelphia's homeless assistance system.

The Philadelphia CoC reduced project amounts for the following reasons:

1. Underspending – The grant amount was reduced for projects that demonstrated spending an average of 75% or less of the award over a three year period.
2. Cost Effectiveness – The grant amount was reduced for transitional housing projects that cost significantly more than other transitional housing projects serving similar populations with similar or better outcomes.
3. Supportive Services Cost Shifting – The grant amount was reduced for permanent supportive housing projects that are able to receive funds from Medicaid reimbursement.

The Philadelphia CoC rejected projects for the following reasons:

1. Reallocation of tenant based rental assistance subsidy project with low occupancy to a new permanent supportive housing project exclusively serving the most vulnerable individuals experiencing chronic homelessness.
2. Reallocation of a transitional housing project to a new permanent supportive housing project exclusively serving the most vulnerable individuals experiencing chronic homelessness.
3. Transitional housing project considered underperforming based on local review process for two consecutive years.

### **Approval of Process for Reallocating**

On Monday, November 2, 2015, the CoC Advisory Committee endorsed the reallocation process. On Thursday, November 5, 2015, the CoC Board approved the reallocation process.

# Governance Charter

---

Philadelphia Continuum of Care

This Governance Charter includes all procedures and policies needed to comply with 24 CFR Part 578 and HMIS requirements as prescribed by the U.S. Department of Housing and Urban Development.

## Table of Contents

---

Background .....	2
Purpose of Charter .....	2
Mission .....	2
CoC Responsibilities .....	2
CoC Staffing .....	4
CoC Membership .....	4
Full Membership Meetings .....	5
CoC Governance Structure.....	5
CoC Board .....	5
CoC Advisory Committee.....	8
Standing Subcommittees.....	9
Workgroups and Ad Hoc Subcommittees .....	11
Code of Conduct .....	11
Rules Regarding Conflicts of Interest .....	12
Rules Regarding Confidentiality .....	12
Code of Conduct Acknowledgement Form .....	13
Effective Date.....	13
Approval of Governance Charter and Subsequent Amendments .....	13

## Background

---

As stated in the U.S. Department of Housing and Urban Development (HUD) Continuum of Care Interim Rule, a Continuum of Care is designed to address homelessness through a coordinated community-based process of identifying needs and building a system of housing and services to address those needs. At a minimum, the system includes:

- Outreach, engagement, and assessment;
- Shelter, housing, and supportive services;
- Homeless prevention strategies

The interim rule establishes the Continuum of Care as the planning body responsible for meeting the goals of the Continuum of Care program. The purpose of the Continuum of Care program is to:

- Promote a community-wide commitment to the goal of ending homelessness;
- Provide funding for efforts to quickly re-house individuals (including unaccompanied youth) and families experiencing homelessness while minimizing trauma and dislocation to those persons;
- Promote access to and effective use of mainstream programs by individuals and families experiencing homelessness; and
- Optimize self-sufficiency among individuals and families experiencing homelessness.

Federal Continuum of Care program funds may be used for 1) permanent housing (PH) which includes permanent supportive housing for persons with disabilities (PSH) and rapid re-housing; 2) transitional housing (TH); 3) Supportive Service Only (SSO); and 4) Homeless Management Information System (HMIS).

## Purpose of Charter

---

This Charter identifies the purpose, composition, responsibilities, and governance of the Philadelphia Continuum of Care (hereinafter referred to as the Philadelphia CoC).

## Mission

---

The mission of the Philadelphia CoC is to coordinate and implement a system that prevents and eradicates homelessness throughout Philadelphia, Pennsylvania. It is a broad-based coalition of homeless housing and shelter providers, consumers, advocates, government representatives, and community stakeholders working together to shape citywide planning and decision-making.

## CoC Responsibilities

---

As established in the interim rule, the Continuum of Care must:

- A. Operate the Continuum of Care
  1. Hold regular meetings of the full membership, with published agendas, at least semiannually;
  2. Issue a public invitation for new members from within the geographic area at least annually;
  3. Adopt and follow a written process to select a CoC board and review, update, and approve the process at least once every 5 years;
  4. Appoint additional committees, subcommittees, or workgroups as needed;
  5. In consultation with the collaborative applicant and the Homeless Management Information System (HMIS) lead, develop, follow, and update annually (1) a governance charter that includes all procedures and policies needed to comply with 24 CFR Part 578.7(b) and with HMIS

- requirements as prescribed by HUD and (2) a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board;
6. Consult with recipients and sub-recipients to establish performance targets appropriate for population and program type, monitor recipient and sub-recipient performance, evaluate outcomes, and take action against poor performers;
  7. Evaluate outcomes of projects funded under the Emergency Solutions Grant (ESG) program and the CoC program, and report to HUD;
  8. Establish and operate a coordinated assessment system, in consultation with recipients of ESG program funds. The coordinated assessment system must comply with the following minimum requirements:
    - i. Cover the geographic area served by the Philadelphia CoC
    - ii. Easily accessed by individuals and families seeking housing services
    - iii. Well advertised
    - iv. Include a comprehensive and standardized assessment tool
  9. Establish and consistently follow written standards for providing CoC assistance, in consultation with recipients of ESG program funds. At a minimum, these written standards must include:
    - i. Policies and procedures for evaluating individuals' and families' eligibility for assistance;
    - ii. Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
    - iii. Policies and procedures for determining and prioritizing which eligible families and individuals will receive rapid re-housing assistance;
    - iv. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid re-housing assistance; and
    - v. Policies and procedures for determining which eligible individuals and families will receive permanent supportive housing assistance.
- B. Designate a Homeless Management Information System (HMIS) for the Continuum of Care
1. Designate a single HMIS for the geographic area
  2. Designate a single eligible applicant to manage its HMIS, which is known as the HMIS Lead;
  3. Review, revise, and approve privacy, security, and data quality plans for the HMIS;
  4. Ensure consistent participation of recipients and subrecipients in the HMIS; and
  5. Ensure the HMIS is administered in compliance with requirements prescribed by HUD.
- C. Plan for the Continuum of Care
1. Coordinate and implement a comprehensive system to address the needs of the homeless population and subpopulations and persons experiencing a housing crisis. At a minimum, the system should include:
    - i. Outreach, engagement, and assessment;
    - ii. Shelter, housing, and supportive services;
    - iii. Homelessness prevention strategies
  2. Plan for and conduct, at least biennially, a Point-in-Time count of homeless persons within the geographic area that meets HUD requirements;
  3. Conduct an annual gaps analysis of the homelessness needs and services within the geographic area;

4. Provide information required to complete the Consolidated Plan;
  5. Consult with local government Emergency Solutions (ESG) program recipients within in the geographic area on the plan for allocating ESG funds and reporting on and evaluating the performance of ESG program recipients and subrecipients.
- D. Prepare Application for CoC Program Funds
1. Design, operate, and follow a collaborative process for the development of applications and approve the submission of applications in response to a NOFA published by HUD;
  2. Establish priorities for funding projects through a process that is transparent, inclusive, and based on the standards indicated in 24 CFR Part 578.19;
  3. Designate the collaborative applicant to submit the CoC Consolidated Application for funding on behalf of the CoC.

## CoC Staffing

---

The City of Philadelphia Office of Supportive Housing (OSH) is the public entity charged with the policy, planning, and coordination of the City’s response to homelessness. Major areas of work include the coordination of the Homeless Continuum of Care and implementation of Philadelphia’s Recalibrated Ten Year Plan to End Homelessness.

The Office of Supportive Housing is the entity responsible for ensuring the Philadelphia CoC fulfills all of the duties of a continuum of care set forth in 24 CFR Part 578 and HMIS requirements as prescribed by the U.S. Department of Housing and Urban Development. Additionally, OSH shall:

- A. Staff the CoC and related board, committees, workgroups, and ad hoc committees, including but not limited to:
  1. Preparing agendas and minutes, meetings materials, and communications
  2. Maintaining records and distribution lists
- B. Serve as the Collaborative Applicant for CoC program funds
- C. Serve as the CoC HMIS Lead
- D. Establish and operate a coordinated assessment system

## CoC Membership

---

Membership in the Philadelphia CoC is open to all stakeholders interested in the purposes of the CoC, including nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and individuals currently or formerly experiencing homelessness.

Annually, the Office of Supportive Housing shall issue a public invitation for any interested person to become a member of the CoC. The invitation shall be sent to relevant organizations and posted on the Office of Supportive Housing website. New members may enroll at any time during the year by providing their name, contact information, and any relevant affiliations to the OSH.

All homeless assistance shelter and housing providers in Philadelphia and stakeholders serving on the Philadelphia CoC Board, CoC Advisory Committee, and CoC Standing Subcommittees are automatically members of the Philadelphia CoC. Voting members are limited to the members of the Philadelphia CoC Board (hereinafter referred to as the CoC Board).

## Full Membership Meetings

---

The full membership of the Philadelphia CoC shall meet at least semi-annually. The semi-annual meetings shall include the following:

1. A report on the CoC's activities and progress toward meeting goals
2. A report on the City of Philadelphia's 10 Year Plan to End Homelessness activities and progress towards meeting goals
3. Any other business the CoC Board and the Office of Supportive Housing chooses to put before the members

Notice of the date, time, and place of full Membership Meetings shall be sent to members by email at least fifteen (15) business days before the meeting date.

The agenda of full Membership Meetings shall be sent to members by email at least five (5) business days before the meeting date.

## CoC Governance Structure

---

The Continuum of Care shall have a CoC Board, CoC Advisory Committee, standing Subcommittees, and ad hoc subcommittees and workgroups to accomplish the responsibilities of the CoC, as defined in the CoC Program interim rule.

### CoC Board

---

The Philadelphia CoC Board is the primary decision making body of the CoC. Decisions shall be made with input from the CoC Advisory Committee, Standing Subcommittees, and the Office of Supportive Housing.

### Responsibilities

---

The CoC Board shall be responsible for approval of all CoC policies, procedures, and CoC program funding decisions.

### Composition

---

In compliance with CoC Program interim rule, the CoC Board must:

1. Include at least one individual currently or formerly experiencing homelessness
2. Represent the relevant organizations and projects serving homeless subpopulations, such as persons with substance use disorders; persons with HIV/AIDS; veterans; the chronically homeless; families with children; unaccompanied youth; the seriously mentally ill; and victims of domestic violence, dating violence, sexual assault, and stalking.

One board member may represent the interests of more than one homeless subpopulation, and the board must represent all subpopulations within the CoC to the extent that someone is available and willing to represent that subpopulation on the board.

The Philadelphia CoC Board shall consist of 17 members, of which 15 are voting members and 2 are non-voting ex-officio members, as follows:

- Voting Members
  - Five (5) government agencies:
    - Department of Behavioral Health and Intellectual disAbility Services (DBHIDS)
    - Office of Housing and Community Development (OHCD)



- Philadelphia’s Community Action Agency (Mayor’s Office of Community Empowerment and Opportunity)
  - Philadelphia Housing Authority (PHA)
  - Philadelphia VA Medical Center
- Four (4) nonprofit homeless assistance providers
- Four (4) individuals currently or formerly experiencing homelessness representing single males and single females, families, and/or youth
- Two (2) community stakeholders e.g business community, hospitals, universities, funders, neighborhood groups/associations
- Non-voting Ex-Officio Members
  - Office of Supportive Housing (OSH)
  - Chair of the CoC Advisory Committee

Each organization/agency shall only fill one voting seat.

Each voting Board member representing an agency or organization must be an executive or senior level staff person.

Each Board member must have a designated alternate on file with the Office of Supportive Housing. Both are considered CoC Board representatives for their specific seat. The CoC Advisory Committee Vice-Chair shall serve as the designated alternate for the Advisory Committee Chair.

### Selection/Election Process

---

For government representatives, each government agency selects a representative and alternate.

For nongovernment representatives, the Office of Supportive Housing shall invite CoC members to apply for CoC Board membership annually. The Nominating Subcommittee shall recommend members to the CoC Board for election to the Board.

### Term of Office

---

Government seats are permanent seats dedicated to respective government agencies to encourage interagency coordination.

Board members representing nongovernment entities shall serve staggered terms of three years so that approximately one-third of members stand for election each year. In the first year, newly-elected members shall draw lots to determine the length of their term—one, two, or three years. A member may serve two – three year terms. Following the end of a member’s second term, he/she shall not be eligible for re-election until one year has passed.

The Chair of the CoC Advisory Committee shall serve on the CoC Board for the duration of his/her two year term as Advisory Committee Chair.

### Resignation and Removal

---

Unless otherwise provided by written agreement, any representative may resign at any time by giving written notice to the Co-Chairs and the Office of Supportive Housing. In addition, members may be removed from the Board by a majority vote of remaining Board members for repeated absence, misconduct, failure to participate, or violation of code of conduct policies.

## Vacancies

---

When a nongovernment representative resigns, is removed from the Board, or cannot serve his/her full term for any reason, the Nominating Subcommittee shall call a special election to fill the unexpired term. The Nominating Subcommittee shall recommend members to the CoC Board for election to the Board.

## Officers

---

The CoC Board shall be led by two Co-Chairs, on which one shall represent the Office of Supportive Housing.

## Election and Term

---

The Co-Chair not representing the Office of Supportive Housing shall be elected by the CoC Board. The ex-officio member representing the CoC Advisory Committee is not eligible for Co-Chair election.

The CoC Board Co-Chair not representing the Office of Supportive Housing shall serve a two-year term. Following the end of this Co-Chair's term, he/she shall not be eligible for re-election until one year has passed.

## Responsibilities

---

The Co-Chairs are responsible for the following:

1. Call for and preside over Regular and Special meetings.
2. Set the CoC Board Meeting agenda, in collaboration with Office of Supportive Housing staff.
3. Ensure that the CoC Board is working collectively and individually to meet the purposes of the Philadelphia CoC.

## Resignation

---

Unless otherwise provided by written agreement, the Co-Chair not representing OSH may resign at any time by giving written notice to the remaining Co-Chair and the Office of Supportive Housing.

## Vacancies

---

When the Co-Chair not representing OSH resigns or cannot serve his/her full term for any reason, the remaining Board members shall call a special election to fill the unexpired term.

## CoC Board Meetings

---

1. There will be a minimum of three (3) CoC Board meetings each Philadelphia CoC year
  - a. The agenda for CoC Board meetings shall be distributed no later than seven (7) business days prior to the scheduled meeting.
  - b. Minutes of all meetings shall be distributed no later than two (2) weeks following the recorded meeting.
2. Special meetings of the CoC Board may be called by the Co-Chairs when it is deemed in the best interest of the Philadelphia CoC or upon the request of the Office of Supportive Housing.
3. Voting Procedure:
  - a. Each voting member present, in person or by their designated alternate, shall be entitled to one vote.
  - b. Upon demand of any voting member, any vote shall be by ballot.
  - c. A quorum of more than 50% of the voting members must be present for a motion to be brought to a vote. If there is no quorum present, the motion is tabled until a time a quorum is present.

- d. A motion passes if greater than 50% of votes cast are in favor of the motion.
  - e. When time-sensitive issues arise requiring a vote before the next scheduled CoC Board meeting, the CoC Board co-chairs may call for votes to be conducted via email. More than 50% of the CoC Board must vote in favor in order for a motion to pass by email vote.
4. The Philadelphia CoC Board will be governed by Roberts Rules of Order.
  5. 100% attendance is expected. However, in order to be eligible for reelection, a representative, or their alternate, must have attended at least 2/3 of the previous year's CoC Board meetings.

## CoC Advisory Committee

---

### Responsibilities

---

The CoC Advisory Committee shall advise and provide input to the Office of Supportive Housing and the CoC Board on issues related to the planning and operation of the Philadelphia CoC, including but not limited to:

1. Process for CoC program funding application development and submission, ensuring it is as competitive as possible
2. Data collection and review of Point-in-Time Count, Housing Inventory Chart, Annual Homeless Assessment Report, and Annual Performance Reports
3. Policy and process recommendations made by CoC Standing Subcommittees

The Advisory Committee shall also provide input to the Office of Supportive Housing on broader implementation and policy issues impacting homelessness (e.g., emerging trends, service gaps).

If applicable, Advisory Committee members shall communicate important Philadelphia CoC activities and decisions to their agencies and/or membership.

### Composition

---

The Advisory Committee shall be made up of CoC members interested in the purposes of the Committee.

Each CoC Advisory Committee member must have a designated alternative on file with the Office of Supportive Housing. Both are considered CoC Advisory Committee representatives for their specific seat.

Each organization/agency shall only fill one seat.

### Term of Office

---

CoC Advisory Committee members shall serve a one year term. There is no limit to the number of terms a member may serve.

### Membership Process

---

To ensure thorough representation by all relevant stakeholders, the Office of Supportive Housing shall invite all CoC members to join the CoC Advisory Committee annually.

### Resignation and Removal

---

Unless otherwise provided by written agreement, any representative may resign at any time by giving written notice to the Chair and the Office of Supportive Housing. In addition, members may be removed from the Advisory Committee by a majority vote of remaining Committee members for misconduct or violation of code of conduct policies.

## Officers

---

The CoC Advisory Committee shall be led by a Chair, who is a non-voting ex-officio member of the CoC Board, and a Vice-Chair.

## Election and Term

---

The Chair and Vice-Chair shall be elected by the Advisory Committee. The Chair and Vice Chair shall each serve 2 year terms. After serving one 2-year term, the Vice-Chair becomes the Committee's Chair. Following the end of the Chair's term, he/she shall not be eligible for re-election until one year has passed.

## Responsibilities

---

The Chair and Vice-Chair are responsible for the following:

1. Call for and preside over Regular and Special meetings.
2. Set the Advisory Committee agenda, in collaboration with Office of Supportive Housing staff.

The Chair represents the Advisory Committee on the CoC Board.

## Resignation

---

Unless otherwise provided by written agreement, a Chair or Vice-Chair may resign at any time by giving written notice to the remaining Chair or Vice-Chair.

## Vacancies

---

When the Chair resigns or cannot serve his/her full term for any reason, the Vice-Chair fills the unexpired term.

When the Vice-Chair resigns or cannot serve his/her full term for any reason, the remaining Committee members shall call a special election to fill the unexpired term.

## Advisory Committee Meetings

---

1. The CoC Advisory Committee shall meet bi-monthly.
  - a. The agenda for Advisory Committee meetings shall be distributed no later than five (5) business days prior to the scheduled meeting.
  - b. Minutes of all meetings shall be distributed no later than two (2) weeks following the recorded meeting.
2. Special meetings of the Advisory Committee may be called by the Chair and Vice-Chair when it is deemed in the best interest of the Philadelphia CoC or upon the request of the Office of Supportive Housing.
3. 100% attendance is expected. However, in order to be eligible for election to a leadership position on the CoC Advisory Committee, a representative, or their alternate, must have attended at least 2/3 of the previous year's Committee meetings. Also, in order to be eligible to vote for the Chair and Vice-Chair, a representative, or their alternate, must have attended at least 2/3 of the previous year's Committee meetings.

## Standing Subcommittees

---

The Philadelphia CoC shall have three standing subcommittees, as follows:

1. HMIS HEARTH Data Subcommittee
2. Nominating Subcommittee
3. Quality Improvement and Evaluation Subcommittee

## Responsibilities

---

### *HMIS HEARTH Data Subcommittee*

---

At a minimum, the HMIS HEARTH Data Subcommittee shall work with the HMIS Lead to:

1. Develop, annually review, and as necessary, make revision recommendations for Philadelphia CoC Board approval the HMIS Governance Charter, privacy, security, and data quality plans, as well as any other HMIS policies and procedures required by federal partners;
2. Develop for Philadelphia CoC Board approval, and implement a plan for monitoring the HMIS to ensure that:
  - a. All HMIS Participating Agencies consistently participate in HMIS;
  - b. HMIS is satisfying the requirements of all regulations and notices issued by federal partners;
  - c. The HMIS Lead is fulfilling the obligations outlined in its HMIS Governance Charter and Agreement with the Philadelphia CoC, including the obligation to enter into written participation agreements with each contributing HMIS organization.
3. Oversee and monitor HMIS data collection and production of the following reports:
  - a. Sheltered point-in-time count (PIT)
  - b. Housing Inventory Chart (HIC)
  - c. Annual Homeless Assessment Report (AHAR)
  - d. Annual Performance Reports (APRs); and
  - e. Data Quality Monitoring Reports

### *Nominating Subcommittee*

---

At a minimum, the Nominating Subcommittee is responsible for the following:

1. Recommend a written process to select a board
2. Coordinate CoC Board election processes
3. Provide guidance and input to OSH on the development and annual update of the governance charter

### *Quality Improvement and Evaluation Subcommittee*

---

At a minimum, the Quality Improvement and Evaluation Subcommittee is responsible for the following:

1. Provide guidance and input on a quality improvement process
2. Consult with OSH to establish performance targets appropriate for population and program type
3. Evaluate outcomes and recommend actions against poor performers
4. Using PIT, HIC, and gap analysis data, recommend funding priorities for annual CoC application
5. Develop evaluation criteria, measurement tool, and renewal evaluation process for project applications
6. Recommend and rank programs/projects to include in the annual CoC application

## Composition

---

Standing Subcommittees shall be made up of CoC members interested in the purposes of the respective subcommittee.

## Term of Office

---

Standing Subcommittee members shall serve a one year term. There is no limit to the number of terms a member may serve.

## Membership Process

---

The Office of Supportive Housing shall invite all CoC members to join the Standing Subcommittees annually.

## Resignation and Removal

---

Unless otherwise provided by written agreement, any representative may resign at any time by giving written notice to the Office of Supportive Housing. In addition, members may be removed from the Advisory Committee by a majority vote of remaining Committee members for misconduct or violation of code of conduct policies.

## Officers

---

Each Standing Subcommittee shall be led by a Chair who shall serve a one year term. There is no limit to the number of terms a Chair may serve.

## Workgroups and Ad Hoc Subcommittees

---

The Philadelphia CoC may establish workgroups and/or ad hoc subcommittees centered around specific subpopulations or to accomplish action specific work. These groups may be ongoing or time limited, shall meet as needed, and may include but are not limited to:

- Children
- Chronic Homelessness
- Coordinated Assessment
- Employment and Income
- Families
- Outreach
- Point-in-Time Count Planning
- Policies and Standards
- Unaccompanied Youth
- Veterans

## Code of Conduct

---

The Philadelphia CoC shall adopt a Code of Conduct to guide its members and staff in their conduct when acting on behalf of the CoC. At a minimum, CoC members and staff shall:

1. Abide by the governing documents and policies of the Philadelphia CoC
2. Comply with applicable federal, state, and local laws, regulations, and fiduciary responsibilities
3. Not accept commissions, gifts, payments, loans, or other items of value from anyone who has or may seek some benefit from the Philadelphia CoC
4. Act at all times in accordance with the highest ethical standards and in the best interest of the Philadelphia CoC, its members, program participants, and constituents
5. Respect the confidentiality of sensitive information about the Philadelphia CoC, its members, program participants, and staff
6. Respect the uniqueness and intrinsic worth of every individual, and treat all people with dignity, respect, and compassion

7. Develop, administer, and advocate for policies and procedures that foster fair, consistent, and equitable treatment for all

## Rules Regarding Conflicts of Interest

---

Board members, committee members, and other Philadelphia CoC agents and employees must abide by the following rules in order to avoid conflicts of interest and promote public confidence in the integrity of the CoC and its processes. Failure to honor these rules will be grounds for removal from the Board and any of its committees.

1. Board members, committee members, and other Philadelphia CoC agents and employees may not participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefit to:
  - a. Any organization that they or a member of their immediate family represents; or
  - b. Any organization from which they or a member of their immediate family derives income, services, or anything of value.
2. Whenever Philadelphia CoC Board members, committee members, agents, employees, or any of their immediate family members have a financial interest or any other personal interest in a matter coming before the Board or one of its committees, they must:
  - a. Fully disclose the nature of the interest; and
  - b. Withdraw from discussing, lobbying or voting on the matter.

With regard to participation in proposal reviews, proposals assigned to each reviewer are sent before the review meeting takes place. Before reviewers score project applications, reviewers are asked to determine whether a conflict of interest exists with any application that has been assigned. If it is determined that a conflict or the appearance of a conflict exists, the application shall be assigned to another reviewer and a replacement application shall be provided. All reviewers shall be required to sign a conflict of interest document.

## Disclosure

---

At the beginning of every meeting of the Board, Committee, or Subcommittee, members must disclose if they have any conflicts of interest or potential conflicts of interest regarding any business included in the meeting's agenda.

## Abstention from Decision-Making

---

Any matter in which Board or committee members have an actual or potential conflict of interest will be decided only by a vote of disinterested individuals. In addition, the minutes of any meeting at which such a vote is conducted must reflect the disclosure of interested Board and committee members' abstention.

## Rules Regarding Confidentiality

---

All Board members, committee members, and other Philadelphia CoC agents and employees shall respect the confidentiality of sensitive information about the Philadelphia CoC, its members, program participants, and staff.

With regard to project application reviews, adherence to confidentiality is critical to the integrity of the review process and the protection of reviewers who are evaluating project applications. Therefore, each individual who participates in the project application review process shall abide by the following confidentiality requirements before, during, and after the review process and when required to vote of funding/submission of funding requests:

1. All information related to project applications shall be kept in strict confidence;

2. Impressions or judgments concerning project applications shall not be discussed or shared with anyone prior to, during, or after the review committee's deliberations (exceptions: discussions with other review committee members during committee deliberations and OSH staff discussions with the CoC Board);
3. Project applications, as well as the ideas, concepts, methods, or techniques included in the applications shall be considered proprietary, and all rights thereby implied shall be respected;
4. Project applications, in part or whole, shall not to be photocopied except by OSH staff for CoC business purposes; and
5. Questions about any specific proposals shall not be directed to the applicant organization, or to a consultant who assisted in the preparation of the application.

Reviewers shall adhere to the following requirements:

1. Statements and notes of the reviewers shall not be shared with anyone outside the review committee;
2. Discussions concerning any specific application shall be confined to the meetings;
3. Proceedings of meetings shall be kept in strict confidence; and
4. Proposals and review materials shall be left with the Office of Supportive Housing staff at the conclusion of the review session.

### Code of Conduct Acknowledgement Form

Philadelphia CoC Board, Advisory Committee and Standing Subcommittee members must sign a Code of Conduct Acknowledgement Form annually, affirming that they have reviewed the code of conduct and conflict of interest policy and disclosing any conflicts of interest that they face or are likely to face in fulfillment of their duties.

### Effective Date

The Philadelphia CoC Governance Charter shall be effective July 1, 2014.

### Approval of Governance Charter and Subsequent Amendments

In consultation with the Office of Supportive Housing, the Board shall review, and if necessary, make changes to the Governance Charter annually to improve the functioning of the Philadelphia CoC and maintain compliance with federal regulations. This Governance Charter and every subsequent amendment to it must be approved by a majority of the Philadelphia CoC Board.

The Philadelphia CoC Governance Charter was originally approved by the Philadelphia CoC Strategic Planning Committee on May 12, 2014 and was last approved by the Philadelphia CoC Board on May 19, 2015.



# HMIS Policy and Procedures Manual

---

Philadelphia Continuum of Care

**This page is intentionally left blank for double-sided printing.**

# Philadelphia Continuum of Care HMIS Governance Charter

---

## Purpose

The purpose of this document is to serve as a governance charter for the oversight of the Homeless Management Information System (heretofore referred to as "HMIS"). This document is to serve as an agreement between the Philadelphia Continuum of Care (CoC) and the City of Philadelphia Office of Supportive Housing (OSH), the designated HMIS Lead Agency. The provisions of this charter shall go into effect immediately.

## Responsibilities of the Philadelphia Continuum of Care

As established in the CoC Program interim rule, the Continuum of Care must:

1. Designate a single Homeless Management Information System (HMIS) for the Philadelphia CoC;
2. Designate a single eligible applicant to manage its HMIS, which is known as the HMIS Lead;
3. Review, revise, and approve privacy, security, and data quality plans for the HMIS;
4. Ensure the consistent participation of CoC Program funded recipients and subrecipients in the HMIS; and
5. Ensure HMIS is administered in compliance with requirements prescribed by HUD.

The Philadelphia CoC shall carry out its responsibilities through the work of Office of Supportive Housing (OSH) staff, the CoC Board, the Advisory Committee, and HMIS HEARTH Data Subcommittee.

## Designations

The Philadelphia CoC designates the City of Philadelphia Office of Supportive Housing as the HMIS Lead Agency to operate the Philadelphia CoC's HMIS.

The Philadelphia CoC designates ClientTrack™ operated by ClientTrack, Inc. as the official HMIS for the Philadelphia CoC.

## Responsibilities of the HMIS Lead Agency

The HMIS Lead Agency shall:

1. Ensure the operation of and consistent participation by recipients of funds from federal partners and their respective programs in the effort to end homelessness, which includes 1) U.S. Department of Health and Human Services (HHS), 2) U.S. Department of Housing and Urban Development (HUD), and 3) U.S. Department of Veterans Affairs (VA). Duties include:
  - a. Establishing the HMIS which includes the selection of the vendor and software;
  - b. Conducting oversight of the HMIS;
  - c. Taking corrective action, if needed, to ensure that HMIS is compliant with all federal standards;
  - d. Making recommendations for changes to the HMIS in order to better support the data reporting needs and requirements of the Philadelphia Continuum of Care and the HMIS participating agencies.
  - e. Adopting written policies and procedures for the operation of the HMIS that apply to the HMIS Lead, the HMIS Participating Agencies, and the Continuum of Care. At least once annually or as required by HUD, submit to the Philadelphia CoC an unduplicated count of clients served and an analysis of the unduplicated counts;
  - f. Submit reports to HUD as required;
  - g. Developing a privacy policy that, at a minimum, includes: data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description; access and correction standards; accountability standards; protections for victims of domestic violence, dating violence, sexual assault,

## HMIS Governance Charter

and stalking; and such additional information and standards as may be established by HUD in notice. Every organization with access to protected identifying information must implement procedures to ensure and monitor its compliance with applicable agreements and the requirements of this part, including enforcement of sanctions for noncompliance.

- h. Requiring the HMIS vendor and software to comply with HMIS standards issued by federal partners as part of its contract.
2. Execute a written HMIS Participation Agreement with each HMIS participating agency, which includes:
  - a. Obligations and authority of HMIS Lead Agency and each HMIS participating agency;
  - b. Requirements of the security plan with which each HMIS participating agency must abide;
  - c. Requirements of the privacy policy with which each HMIS participating agency must abide;
  - d. Sanctions for violating the HMIS Participation Agreement (*e.g.*, imposing a financial penalty, requiring completion of standardized or specialized training, suspending or revoking user licenses, suspending or revoking system privileges, or pursuing criminal prosecution);
  - e. Agreement that HMIS Lead Agency and HMIS participating agencies will process Protected Identifying Information consistent with the agreement; and
  - f. HMIS Participation Agreement may also address other activities to meet local needs.
3. Serve as the applicant to HUD for grant funds to be used for HMIS activities for the Philadelphia Continuum of Care, as directed by the Philadelphia Continuum of Care, and enter into a grant agreement with HUD to carry out the HUD-approved activities;
4. Monitor and enforce compliance by all HMIS participating agencies with all federal requirements and report on compliance to the Philadelphia Continuum of Care Advisory Committee and federal partners;
5. Monitor data quality and take necessary actions to maintain input of high-quality data from all HMIS Participating agencies.
6. Submit a security plan, a data quality plan, and a privacy policy to the Philadelphia Continuum of Care Board for approval within 6 months of the effective date of the HMIS final rule and within 6 months after the date that any change is made to the local HMIS. The HMIS Lead Agency must review and update the plans and policy at least annually. During this process, the HMIS Lead Agency must seek and incorporate feedback from the Philadelphia Continuum of Care and from the HMIS participating agencies. The HMIS Lead must implement the plans and policy within 6 months of the date of approval by the Philadelphia Continuum of Care Board.

## Responsibilities of the CoC HMIS HEARTH Data Subcommittee

The HMIS Subcommittee shall work with the HMIS Lead to:

1. Develop, annually review, and, as necessary, make revision recommendations for Philadelphia CoC Board approval a privacy, security, and data quality plans, as well as any other HMIS policies and procedures required by federal partners;
2. Develop for Philadelphia CoC Board approval, and implement a plan for monitoring the HMIS to ensure that:
  - a. All HMIS Participating Agencies consistently participate in HMIS;
  - b. HMIS is satisfying the requirements of all regulations and notices issued by federal partners;
  - c. The HMIS Lead is fulfilling the obligations outlined in its HMIS Governance Charter and Agreement with the Philadelphia CoC, including the obligation to enter into written participation agreements with each contributing HMIS organization.
3. Oversee and monitor HMIS data collection and production of the following reports:
  - a. Sheltered point-in-time count;

HMIS Governance Charter

- b. Housing Inventory Chart;
- c. Annual Homeless Assessment Report (AHAR);
- d. Annual Performance Reports (APRs); and
- e. Data Quality Monitoring Reports

**Responsibilities of the HMIS Participating Agencies**

HMIS Participating Agencies shall:

1. Comply with federal HMIS regulations as found in:
  - a. Federal Register, Vol. 69, No. 146, Part II, Department of Housing and Urban Development, Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice; Notice, July 30, 2004 ("HUD HMIS 2004 Final Notice"); and
  - b. U.S. Department of Housing and Urban Development, Office of Community Planning and Development, 2014 Homeless Management Information System (HMIS) Data Standards: Dictionary and Manual, Version 2.1, August 2014 ("2014 HMIS Data Standards"); and
  - c. Any subsequent revisions either notice.
2. Comply with the Homeless Management Information Participation Agreement;
3. Comply with all policies and procedures that are developed by the HMIS Lead Agency, including: data quality, privacy, and security plans;
4. Participate in the Philadelphia CoC Data Quality Monitoring efforts by implementing internal processes to reduce the percentage of client records containing null, don't know, and refused values and to ensure valid program entry and exit dates are entered into HMIS in a timely fashion.

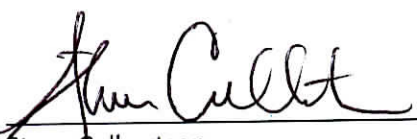
**Duration**

The duration of this charter shall last until terminated by either Party. This charter must be reviewed annually and updated as needed.

This charter was originally approved by the Philadelphia CoC on December 7, 2012 and was last approved by the Philadelphia CoC Board on November 5, 2015.

  
\_\_\_\_\_  
Marie S. Nahikian  
Director, City of Philadelphia Office of Supportive Housing

11-5-15  
Date

  
\_\_\_\_\_  
Steve Culbertson  
Chairperson, Philadelphia Continuum of Care Board

11/5/15  
Date

**This page is intentionally left blank for double-sided printing.**

# Philadelphia Continuum of Care HMIS Security Plan

---

## Purpose

This plan describes the standards for the security of all data contained in the Philadelphia Continuum of Care Homeless Management Information System (HMIS). This plan outlines the security measures currently implemented by the HMIS Lead Agency, the City of Philadelphia Office of Supportive Housing (OSH) and details the baseline security requirements for all HMIS Participating Agencies.

## Applicability

OSH and HMIS Participating Agencies must apply system security provisions to all the systems where personal protected information (PPI) is stored, including, but not limited to, its networks, desktops, laptops, mini-computers, mainframes and servers.

In addition to the Philadelphia Continuum of Care Security Plan, OSH must also adhere to the City of Philadelphia's Information Security Policy – Access Control and the Information Security Policy – Physical and Environmental Security (see Appendix).

## User Authentication

Upon successful completion of training and subject to approval by OSH, each HMIS user will be provided with a unique personal User Identification Code (User ID) and initial password to access the HMIS.

While the User ID provided will not change, HUD standards require that the initial password only be valid for the user's first access to the HMIS. Upon access with the initial password, the user will see a screen that will prompt the user to change the initial password to a personal password created by the user.

- A. Only the user will know the personal password he or she creates. It is the user's responsibility to remember the password.
- B. The password created by the user must meet the following Federal and application-enforced guidelines:
  - The password must be at least eight characters long.
  - The password must contain at least one letter.
  - The first character of the password must be a letter.
  - The password must contain at least one number.
  - The password must contain at least one symbol or punctuation character.
  - The password may not contain your User ID.
  - The password may not contain the consecutive upper- or lower-case letters "HMIS" or "hmis."

Providers are responsible for communicating all staff departures to the OSH IT Unit in a timely manner to ensure user profiles for departed staff are inactivated.

- C. The password may not be stored in a publicly accessible location and written information pertaining to the User ID, password, or how to access the HMIS may not be displayed in any publicly accessible location.
- D. The user is not permitted to divulge this password or to share this password with anyone.

## Application Security

All computers connecting to HMIS must run a current version of anti-virus software. This is enforced for City of Philadelphia workers through an Active Directory network policy, and applies to devices directly attached to the City of Philadelphia's Wide Area Network. HMIS Participating Agencies must maintain anti-virus software on all PC's on their network. PC's that access the Internet must be configured to automatically download updated virus definitions. HMIS participating providers are responsible for assuring that devices used to access the Philadelphia Continuum of Care's HMIS are protected. Steps should also be taken to prevent the intrusion of "adware" and "spyware" programs.

The application is accessed by users via a secure HTTPS connection to the software web application server. The HTTPS protocol, which is designed to prevent eavesdropping and tampering, provides a secure communication channel to the application.

## Physical Access to Systems with Access to HMIS Data

Every computer that is used to access the HMIS must have a password-protected screen saver that automatically turns on when the computer is temporarily not in use. If an HMIS user will be away from the computer for an extended period of time, he or she is required to log off from HMIS before leaving the work area in which the computer is located.

## Disaster Protection and Recovery

### Backup procedures and off-site storage facilities

Incremental/differential database backups are performed every three (3) hours. Transaction logs are backed up every four (4) hours. A full database backup to the hosted offsite secure storage facility is performed nightly. All backups are encrypted with 256-bit Advanced Encryption Standard (AES).

### Restoration and recovery procedures at the host level

In the event that the primary ClientTrack hosting facility experiences a catastrophic interruption in service, the Service will fail over to the secondary hosting facility within a Recovery Time Objective (RTO) of 4 hours or less. For all other interruptions in Service affecting data integrity, the Recovery Point Objective (RPO) will be to the last backup, which is three (3) hours or less.

## Issue Severity Levels

Issues will be categorized and handled according to an assigned Severity Level. The Issue Severity Level is assigned by ClientTrack based upon initial triage processes.

Severity Level	Description	Response Times
Level 1 – Critical (Security Related)	The issue relates to the security of private data or the perception that private data may be available to unauthorized users.	1 hour
Level 2 – Urgent (Data Integrity)	The issue relates to the integrity of data being saved or viewed. No reasonable workaround is available.	1 hour
Level 3 – High (Availability)	The issue related to the availability of the Application, including all issues related to latency.	1 hour
Level 4 – Medium (Warranty)	The issue relates to a bug impacting normal use of the Application as it was intended or configured to perform.	1 business day
Level 5 – Medium (Information Request)	Inquiry regarding a routine technical issue; information requested on application capabilities, navigation, installation or configuration; request for a System change.	2 business days



## Support Escalation Table

Level	ClientTrack Resource	Licensee Resource
1st Level	Support Manager	Project Manager
2nd Level	Director Level Contact	Director Level Contact
3rd Level	Corporate Officer Contact	Corporate Officer Contact

- A. All Severity Level 1 and 2 issues should be escalated to the 3<sup>rd</sup> level of the Support Escalation Table at the time of Issue submission
- B. All Severity Level 3 issues should be escalated to the 1<sup>st</sup> level of the Support Escalation Table at the time of Issue submission
- C. Any Incident handling that does not achieve its objective response time for its Severity Level or for which a resolution plan is viewed as unsatisfactory by either party should be escalated to the next level, and to each successive escalation level until satisfaction is achieved

## Disposal

The City of Philadelphia contracts with a certified specialist for destruction of physical disk drives who can be utilized as required.

## Encryption

The application is accessed by users via a secure HTTPS connection to the software web application server. The HTTPS protocol, which is designed to prevent eavesdropping and tampering, provides a secure communication channel to the application.

## Hard Copy Security

The guidelines regarding the security of paper or other hard copy containing PPI that is either generated by or for the HMIS, including, but not limited to reports, data entry forms, and signed consent forms are:

1. HMIS Participating Agency staff must supervise at all times any paper or other hard copy generated by or for the HMIS that contains PPI when the hard copy is in a public area.
2. Hard copy records containing PPI must be disposed of through means such as cross cut shredding and pulverizing.
3. When HMIS Participating Agency staff is not present, the information must be secured in areas that are not publicly accessible.
4. Written information specifically pertaining to user access (e.g., User ID and password) must not be stored or displayed in any publicly accessible location.

## Duration

This plan must be reviewed annually and updated as needed by the Philadelphia Continuum of Care.

This plan was originally approved by the Philadelphia CoC Strategic Planning Committee on January 30, 2014 and was last approved by the Philadelphia CoC Board on November 5, 2015.

**This page is intentionally left blank for double-sided printing.**

# Philadelphia Continuum of Care HMIS Privacy Plan

---

## Purpose

This document describes the privacy plan of the City of Philadelphia Office of Supportive Housing (OSH) and agencies contributing data (HMIS Participating Agencies) to the Philadelphia Continuum of Care Homeless Management Information System (HMIS). This document covers the processing of protected personal information for clients of HMIS Participating Agencies.

Protected Personal Information is any information we maintain about a client that:

- a. Allows identification of a client/consumer directly or indirectly
- b. Can be manipulated by a reasonably foreseeable method to identify a specific client/consumer, or
- c. Can be linked with other available information to identify a specific client/consumer.

The provisions of this plan shall go into effect immediately.

## Data Collection Notice

HMIS Participating Agencies must let clients know that personal identifying information is being collected, and the reasons for collecting this information. To meet this requirement, HMIS Participating agencies must post the following language in places where intake takes place:

OSH and its contracted provider agencies collect personal information directly from you for reasons that are discussed in our NOTICE OF PRIVACY PRACTICES. OSH and its contracted provider agencies may be required to collect some personal information by law or by organizations that provide funds to operate this program. Other personal information that is collected is important to run our programs, to improve services, and to better understand the needs of individuals being served. OSH and its contracted provider agencies only collect information that is considered to be appropriate.

While the posted notice is the minimum requirement, agencies may choose to take additional steps to obtain consent from clients, including obtaining written consent. Agencies without a contractual relationship with OSH may use an Agency-specific alternative that complies with HUD's baseline privacy standards.

Each Agency shall adopt and comply with the Notice of Privacy Practices for Use with the Homeless Management Information System ("HMIS Privacy Notice"). Agencies without a contractual relationship with OSH may use an Agency-specific alternative that complies with HUD's baseline privacy standards.

Each Agency must provide a copy of the *HMIS Privacy Notice* upon client request. Clients must acknowledge receipt by signing the *Acknowledgement Form*. Agencies without a contractual relationship with OSH may use an Agency-specific alternative. The Agency must keep signed copies of the *Acknowledgement Form*.

Each Agency shall provide reasonable accommodations to persons with disabilities and to persons with limited English proficiency to ensure their understanding of the HMIS Privacy Notice and/or Acknowledgement Form.

## Accountability

Each agency must uphold relevant federal and state confidentiality regulations and laws that protect client records, including but not limited to the privacy and security standards found in HUD's Data and Technical Standards. If the Agency is a HIPAA-covered entity, the Agency is required to operate in accordance with HIPAA regulations and is exempt from the privacy and security standards found in HUD's Data and Technical Standards.

## Access and Correction

Each agency must allow individuals to inspect and have a copy of their personal information that is maintained in HMIS.

Each agency must offer to explain any information that is not understood.

Individuals must submit a request to inspect their HMIS data in writing to their social worker/case manager. Each agency must consider a written request for correction of inaccurate or incomplete personal information. If the agency agrees that the information is inaccurate or incomplete, the agency may delete it or may choose to mark it as inaccurate or incomplete and to supplement it with additional information.

Each agency may deny the individual's request for inspection or copying of personal information if:

- a. Information was compiled in reasonable anticipation of litigation or comparable proceedings
- b. Information is about another client/consumer
- c. Information was obtained under a promise of confidentiality and the disclosure would reveal the source of the information, or
- d. Disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.

If the agency denies a request for access or correction, it must explain the reason for the denial and include documentation of the request and the reason for the denial.

Each agency may reject repeated or harassing requests for access or correction.

## Purpose and Use Limitations

Each agency will use or disclose personal information for activities described in this part of the notice. The agency assumes that clients consent to the use or disclosure of personal information for the purposes described here and for other uses and disclosures that are determined to be compatible with these uses or disclosures:

- a. To provide or coordinate services to individuals (shelter, housing, case management, etc.)
- b. For functions related to payment or reimbursement for services
- c. To carry out administrative functions such as personnel oversight, management functions, and auditing purposes.
- d. To create de-identified (anonymous) information that can be used for research and statistical purposes
- e. When required by law
- f. To avert a serious threat to health or safety if
  - i. the agency believes that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public, and
  - ii. the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat
- g. To report victims of abuse when authorized by law.
- h. For research purposes unless restricted by other federal and state laws.
- i. To a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct).
- j. For judicial and administrative proceedings in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena.
- k. To comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.

Before any use or disclosure of personal information that is not described here, the agency must seek the clients consent first.

## **Confidentiality**

Each agency must maintain any/all personal information as required by federal, state, or local laws.

Each agency shall only solicit or input into HMIS client information that is essential to providing services to the client.

Each agency shall not knowingly enter false or misleading data under any circumstance, nor use HMIS with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.

Each agency shall ensure that all staff, volunteers and other persons who use HMIS are issued an individual User ID and password.

Each agency shall ensure that all staff, volunteers and other persons issued a User ID and password for HMIS receive confidentiality training, HMIS training, and comply with the attached *HMIS User Agreement* and the *HMIS Participation Agreement*.

## **Protections for victims of domestic violence, dating violence, sexual assault, and stalking**

Victim service providers are prohibited from entering data into HMIS. Other agencies must be particularly aware of the need for confidentiality regarding information about persons who are victims of domestic violence, dating violence, sexual assault, and stalking. Additional protections for these clients includes explicit training for staff handling personal identifying information of the potentially dangerous circumstances that may be created by improper release of this information.

## **Duration**

This plan must be reviewed annually and updated as needed by the Philadelphia Continuum of Care.

This plan was originally approved by the Philadelphia CoC Strategic Planning Committee on January 21, 2014 and was last approved by the Philadelphia CoC Board on March 18, 2015

**This page is intentionally left blank for double-sided printing.**

# Philadelphia Continuum of Care HMIS Data Quality Plan

---

## Background

For more than a decade, Congress has expressed the need for better local and national information about persons experiencing homelessness in a series of Congressional directives, beginning with the FY 1999 U.S. Department of Housing and Urban Development (HUD) Appropriations Act. In 2001 Congress directed HUD to take the lead in requiring every jurisdiction to have unduplicated client-level data within three years. In subsequent years, Senate and House Appropriations Committee reports have directed HUD to assist communities in implementing local Homeless Management Information Systems (HMIS) and to develop an Annual Homeless Assessment Report (AHAR) that is based on HMIS data.

HMIS is now used by the following federal partners and their respective programs in the effort to end homelessness:

- U.S. Department of Health and Human Services (HHS)
- U.S. Department of Housing and Urban Development (HUD)
- U.S. Department of Veterans Affairs (VA)

Philadelphia Continuum of Care's (CoC) HMIS is a client information system designed to record and store client-level information on the characteristics and service needs of persons experiencing homelessness. HMIS assists the Philadelphia CoC to become better informed about the extent and nature of homelessness over time. Specifically, HMIS can be used to produce an unduplicated count of persons experiencing homelessness, understand patterns of service use, measure the effectiveness of homeless programs, and assist in the efficient provision of services to homeless persons. HMIS is also used to help with system planning and design including long-term strategic planning and shorter-term evaluations and interventions.

Philadelphia's HMIS is administered by the City of Philadelphia Office of Supportive Housing (OSH) in partnership with the Philadelphia CoC and in accordance with federal HMIS rules and regulations.

## Purpose

The purpose of the Philadelphia Continuum of Care Homeless Management Information System Data Quality Plan (HMIS Data Quality Plan) is to standardize expectations and provide guidance to HMIS-participating projects on the extent, completeness, and quality data elements entered into HMIS to meet participation and reporting requirements established by HUD and the federal partners.

In so doing, the City hopes to streamline the process of completing Annual Performance Reports for HUD and submitting information for the Annual Homeless Assessment Report in full compliance with HUD's expectations. In addition, the HMIS Data Quality Plan is intended to assist the CoC in its preparations for the new system-wide performance measures contained in the McKinney-Vento Homeless Assistance Act as amended by S. 896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. Further, the improvement of HMIS data will assist the CoC to continue to achieve a high score in the competitive annual application for CoC Program funding.

## Development Process

The HMIS Data Quality Plan was developed through a collaborative effort across homeless service providers and spearheaded by the HMIS & HEARTH Data Subcommittee of the McKinney Public/Private Strategic Planning Committee, which included representatives from the following organizations: City of Philadelphia Office of Supportive Housing, People's Emergency Center, Kutztown University, Project HOME, Dignity Housing, The Salvation Army Red Shield Family Residence, SELF, Inc., and Temple University.

## Definitions

**Project vs Program:** Across the federal agencies the terms project and program are used differently. In this document, and for the purposes of data collection in HMIS, a **program refers to** the federal funding source (e.g., HUD CoC, HHS PATH, VA SSVF, etc). **A project refers to** a distinct unit of an organization, which may or may not be funded by HUD or the federal partners, that provides services and/or housing and is identified by the CoC as part of its service system. A continuum project can be classified as one that provides housing (housing project) or one that does not provide housing (services project). Projects may enter data directly into HMIS or submit data extract files for upload into HMIS. Projects which submit via data extract have chosen to participate in HMIS in this way because they have their own proprietary data systems in place to track and maintain data on their constituents. They create an annual export for import into HMIS.

**Housing Project:** Provides overnight accommodations and whose primary purpose is to meet the specific needs of people who are experiencing homelessness. This includes projects classified as the following under the data element Project Type: Emergency Shelter, Safe Haven, Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, Permanent Housing with Services, and Permanent Housing: Housing Only.

**Services Project:** Does not provide housing and whose primary purpose is to provide services that meet the specific needs of people who are experiencing or at risk of homelessness. This includes projects classified as the following under the data element Project Type: Coordinated Assessment, Homelessness Prevention, Street Outreach, Day Shelter, Services Only, and Other.

**HMIS Universal Data Elements (UDE)** are elements required to be collected by ***all*** projects participating in HMIS, regardless of funding source. They establish the baseline data collection requirements for all contributing CoC projects; and are the basis for producing unduplicated estimates of the number of people experiencing homelessness, accessing services from homeless assistance projects, basic demographic characteristics of people experiencing homeless, and patterns of service use, including information on shelter stays and homelessness over time.

**Program Specific Data Elements (PSDE)** differ from the Universal Data Elements in that no one project must collect every single element in this section. Required data elements are dictated by the reporting requirements set forth by funding source.

**HMIS data quality** refers to the extent that data recorded in HMIS accurately reflects the same information in the real world. To meet the Philadelphia CoC's goal of presenting accurate and consistent information on homelessness, it is critical that HMIS have the best possible representation of reality as it relates to homeless people and the programs that serve them. Specifically, the goal is to record the most accurate, consistent and up-to-date information in order to draw reasonable conclusions about the extent of homelessness and the impact of homeless services and to utilize for planning and evaluation purposes.

## Applicability of Data Quality Standards

The Data Quality Standards contained herein are applicable to **all** HMIS participating projects, including projects that enter data directly into HMIS and projects that submit data extract files for upload into HMIS. For those projects that submit data extract files, the HMIS Data Quality Standards apply to the entry of data into the agency's in-house client information system. The Standards also apply to all actions taken by providers leading up to the creation of their extract files; in other words, all information entered into the data systems used to create extract files must conform with the guidelines set out in this document.

## Key Documents

Key documents needed as supporting references to this document are listed below:

- a. Federal Register, Vol. 69, No. 146, Part II, Department of Housing and Urban Development, Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice; Notice, July 30, 2004 ("HUD HMIS 2004 Final Notice");



- b. U.S. Department of Housing and Urban Development, Office of Community Planning and Development, 2014 Homeless Management Information System (HMIS) Data Standards: Dictionary and Manual, Version 2.1, August 2014 (“2014 HMIS Data Standards”); and
- c. The McKinney-Vento Homeless Assistance Act as amended by S. 896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009.

## HMIS Data Quality Standards

The HMIS Data Quality Standards for the Philadelphia CoC are split into six (6) categories: Timeliness, Completeness, Accuracy, Consistency, Monitoring, and Incentives. Unless otherwise noted, all HMIS participating programs, including those that provide data extract files for upload into HMIS, are expected to achieve and maintain the Data Quality Standards.

Training of HMIS system users is recognized to be important in assuring the completeness, accuracy, and consistency of data. To that end, data quality will be supported through timely and appropriate system training, including the utilization of methodologies such as: Train-the-Trainer and Computer Based Training (CBT).

### 1. Timeliness

The purpose of this timeliness standard is to reduce human error that occurs when too much time has elapsed between data collection (or service transaction) and data entry into HMIS. The individual doing the data entry may be relying on handwritten notes or his/her own recall of a case management session, service transaction, or program exit date; therefore, the sooner the data is entered, the better chance the data will be correct. Timely data entry also ensures that data is as close to “real-time” as possible and accessible when it is needed – either pro-actively (for monitoring purposes, publishing information to increase awareness, or to meet reporting requirements) or reactively (in response to a request for information or to respond to inaccurate information).

#### 1a. Timeliness Standard

All Projects will ensure that data elements for new clients, services, and entry/exits are entered in a timely manner into HMIS.

Data must be collected, at a minimum, at project entry, during program enrollment, and at project exit according to the baselines found in the Appendix. All projects are encouraged to collect all of the required Data Elements as close to each client’s project entry and exit as possible. In addition:

- OSH-contracted Emergency Housing programs must collect the required Data Elements within the timeframes established in the Social Worker/Case Management Performance Standards and Homeless Management Information System Standards (HMIS) found in the OSH Emergency Housing Standards.
- Homelessness Prevention, Housing Retention, and Rapid Re-housing Programs must collect the HUD-required Data Elements in accordance with the timeframes set forth in the most recent Request for Proposals as well as the program’s most recent OSH contract documents.

Once collected, projects will enter the data in HMIS according to the following timeframes:

- OSH Contracted Emergency Housing Projects: All required UDEs and PSDEs will be entered within 24 hours of the data collection.
- Transitional and Permanent Supportive Housing Projects receiving funding through OSH and/or the McKinney-Vento Act: All required UDEs and PSDEs will be entered within thirty (30) days of data collection.
- OSH Centralized Intake Sites and After Hours Processing Sites: All required UDEs will be entered at time of data collection.
- Homelessness Prevention, Housing Retention, and Rapid Re-housing Programs: All required UDEs and PSDEs will be entered at time of data collection.

- OSH Emergency Assistance and Response Unit: All required UDEs and PSDEs will be entered at time of data collection.
- Non-Contracted Emergency Housing, Transitional Housing, and Permanent Supportive Housing Projects (Projects not receiving funding through OSH and/or the McKinney-Vento Act): All UDEs will be entered within thirty (30) days of data collection.

## 2. Completeness

The purpose of completeness is to ensure sufficient demographic and service use data is collected to facilitate confident reporting and analysis on the extent and characteristics of persons experiencing homelessness in Philadelphia including:

- Unduplicated counts of clients served at the local level
- Patterns of use of people entering and exiting the homeless assistance system
- Evaluation of the effectiveness of homeless systems
- Systems planning for future housing and service needs

In effect, complete data tells the full “story” of homelessness.

### 2a. Completeness Standard

All Projects will ensure each of their required Data Elements is entered into HMIS for all clients served by the project. Therefore, the percentage of data elements with missing/blank entries for all clients served will be zero (0). Please refer to Appendix 1 for a detailed listing of the required Data Elements. In addition, all Projects will make reasonable efforts to limit the percentage of don't know/refused entries. While a specific standard for don't know/refused entries has not been set, these entries will also be included in the data monitoring process.

## 3. Accuracy

The purpose of accuracy is to ensure that the data housed in HMIS is the best possible representation of reality as it relates to people who are experiencing homelessness and the projects in which they participate.

### 3a. Accuracy Standard

All Projects will ensure that data entered in HMIS accurately reflects the information provided by the client. Project staff will not knowingly enter into HMIS inaccurate or false information. To the extent that clients and other agencies supplying information have provided accurate data, HMIS users are responsible for the accuracy of the data they enter into the HMIS. Immediately upon discovery, inaccurate or out-dated data will be updated by the project. In addition, responses of “Don't Know” and “Refused” will be updated immediately once the information is known.

## 4. Consistency

The purpose of consistency is to ensure a common interpretation of questions, answers, and which fields need completion in HMIS.

### 4a. Consistency Standard

All data required to be in HMIS will be collected and entered in a common and consistent manner across all Projects. To that end, all HMIS users will complete an initial orientation before accessing the HMIS. As part of the orientation, all new HMIS users will review Sections 3 and 4 of the 2014 HMIS Data Standards, which outlines the Universal and Program Specific Data Elements, including their rationale, collection point(s), data collection instructions, and response category descriptions. All existing HMIS users are encouraged to review this document on a quarterly basis.

## **5. Monitoring**

The purpose of monitoring is to ensure that the HMIS Data Quality Standards are met to the greatest possible extent and that data quality issues are quickly identified and resolved.

### ***5a. Monitoring Standard***

All Projects are expected to meet the HMIS Data Quality Standards described in this document. Each Project is responsible for monitoring its own data and establishing internal data quality control procedures. Projects are encouraged to utilize all applicable reports that can be generated directly from HMIS. In addition, the HMIS Lead Agency will monitor HMIS data on the project and system levels in accordance with the Data Quality Monitoring Plan to be developed by the HMIS HEARTH Data Subcommittee and will report results by program and by overall totals at appropriate times throughout the year. Projects that fail to meet the data standards will be asked by the HMIS Lead Agency to submit a written plan that details how they will take corrective action and the timeline for doing so. The plan will be submitted to, and monitored by, the CoC Advisory Committee.

## **6. Incentives**

The purpose of incentives is to provide positive re-enforcement to Philadelphia CoC service providers who achieve and maintain the level of data quality outlined in this HMIS Data Quality Plan.

### ***6a. Incentives Standard***

Projects with the best performance with regards to the Data Quality Standards will be recognized by the CoC Advisory Committee.

Projects that receive CoC Program funding will submit data quality statistics in their annual renewal application to the Office of Supportive Housing. One of the criteria on which the project's renewal application will be scored will be the project's achievement of the Data Quality Standards.

Projects are encouraged to develop their own internal incentives.

## **Duration**

This plan must be reviewed annually and updated as needed by the Philadelphia Continuum of Care.

This plan was originally approved by the Philadelphia CoC on August 8, 2011 and was last approved by the Philadelphia CoC Board on March 18, 2015.

## Data Collection Requirements

### Universal Data Element (UDE) Collection Summary

Applicable Projects: **All HMIS Participating Projects**, regardless of funding source, including but not limited to:

- Emergency, Transitional, and Permanent Supportive Housing
- Homelessness Prevention
- Rapid Re-Housing
- OSH Centralized Intake Sites
- After Hours Processing Sites
- Emergency Assistance and Response Unit

Data Element		Collected For				Collection Point			
		All	HoH	HoH and Adults	Adults	Record Creation	Project Entry	Update	Project Exit
3.1	Name	X				X			
3.2	Social Security Number	X				X			
3.3	Date of Birth	X				X			
3.4	Race	X				X			
3.5	Ethnicity	X				X			
3.6	Gender	X				X			
3.7	Veteran Status				X	X			
3.8	Disabling Condition				X		X		
3.9	Residence Prior to Project Entry			X			X		
3.10	Project Entry Date	X					X		
3.11	Project Exit Date	X							X
3.12	Destination			X					X
3.13	Personal ID	X				X			
3.14	Household ID	X					X		
3.15	Relationship to Head of Household	X					X		
3.16	Client Location		X				X	X	
3.17	Length of Time on Street, in an Emergency Shelter or Safe Haven			X			X		

### Program Specific Data Elements (PSDE)

The following PSDEs are required for Homeless Prevention, Emergency Housing (EH), Transitional Housing (TH), Rapid Re-Housing (RRH), and Permanent Supportive Housing (PSH) projects receiving funding from the following sources:

- City of Philadelphia Office of Supportive Housing (OSH)
- HUD Continuum of Care Program (CoC)
- HUD Emergency Solutions Grants Program (ESG)
- HUD-Veterans Affairs Supportive Housing Program (HUD/VASH)

Data Element		Collected For				Collection Point			
		All	HoH	HoH and Adults	Adults	Project Entry	Annual Assessment	Update as Info Changes	Project Exit
4.2	Income and Sources			X		X	X	X	X
4.3	Non-Cash Benefits			X		X	X	X	X
4.4	Health Insurance	X				X	X	X	X
4.5	Physical Disability	X				X		X	X
4.6	Developmental Disability	X				X		X	X
4.7	Chronic Health Condition	X				X		X	X
4.8	HIV/AIDS	X				X		X	X
4.9	Mental Health Condition	X				X		X	X
4.10	Substance Abuse	X				X		X	X
4.11	Domestic Violence			X		X		X	
4.17	Residential Move-In Date (RRH Projects Only)	X				X		X	
4.19	Housing Assessment at Exit (Homeless Prevention Projects Only)	X							X

\* These are the minimum data collection standards as established by federal partners. OSH contractual requirements supersede these baseline standards, if applicable.

Please refer to the 2014 HMIS Data Standards for information on required PSDEs for projects receiving funding from the following sources:

- HUD Housing Opportunities for Persons with AIDS Program (HOPWA)
- HHS Runaway and Homeless Youth Program (RHY)
- HHS Projects for Assistance in Transition from Homelessness (PATH)
- VA Supportive Services for Veteran Families Program (SSVF)

**This page is intentionally left blank for double-sided printing.**

## Participation Agreement

The City of Philadelphia Homeless Management Information System (“HMIS”) is a client information system designed to record and store client-level information on the characteristics and service needs of homeless persons. HMIS assists the Philadelphia Continuum of Care to become better informed on the extent and nature of homelessness over time. Specifically, HMIS can be used to produce an unduplicated count of homeless persons, understand patterns of service use, and measure the effectiveness of homeless programs.

HMIS is administered by the City of Philadelphia Office of Supportive Housing (“OSH”) in partnership with the Philadelphia Continuum of Care and in accordance with the U.S. Department of Housing and Urban Development’s (“HUD”) HMIS regulations as found in:

- *Federal Register, Vol. 69, No. 146, Part II, Department of Housing and Urban Development, Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice; Notice, July 30, 2004 (“HUD HMIS 2004 Final Notice”); and*
- *U.S. Department of Housing and Urban Development, Office of Community Planning and Development, Homeless Management Information System (HMIS), Data Standards, Revised Notice, March 2010 (“HUD HMIS 2010 Revised Notice”).*

These documents will be henceforth collectively referred to as HUD’s Data and Technical Standards.

## HMIS Participation

1. An agency is considered to be an HMIS Participating Agency (“Agency”) when it collects client-level data on homeless clients for an HMIS.
2. By participating in HMIS, the Agency, including its employees, volunteers, affiliates, contractors, and associates, is subject to all data collection, privacy, and security standards set forth in HUD’s Data and Technical Standards as well as any subsequent revisions.
3. The Agency shall provide accurate and timely client data to OSH through direct data entry into HMIS and/or the submission of data extract files for upload into HMIS (data integration). The manner of participation shall be determined by OSH on the program level and shall be based on the program’s status in relation to the following factors:
  - Contractual relationship between OSH and the program; and
  - Program’s existing client-level data collection system.
4. The Agency’s minimum data collection requirements shall be determined on the program level and shall be based on the program’s status in relation to the following factors:
  - Contractual relationship between OSH and the program; and
  - Program’s receipt of U.S. Department of Housing and Urban Development (HUD) McKinney-Vento Act program funds

Minimum Data Reporting Requirements:

Program Status	HUD Universal Data Elements	HUD Program-Specific Data Elements	Data Elements Established by OSH
<ul style="list-style-type: none"> <li>▪ No contractual relationship with OSH and</li> <li>▪ Does not receive HUD McKinney-Vento Act funds and</li> <li>▪ Does not receive Homelessness Prevention and Rapid Re-Housing Program funds</li> </ul>	X		
<ul style="list-style-type: none"> <li>▪ No contractual relationship with OSH and</li> <li>▪ Receives HUD McKinney-Vento Act funds and/or</li> <li>▪ Receives Homelessness Prevention and Rapid Re-Housing Program funds</li> </ul>	X	X	
<ul style="list-style-type: none"> <li>▪ Contractual relationship with OSH and</li> <li>▪ Does not receive HUD McKinney-Vento Act funds and</li> <li>▪ Does not receive Homelessness Prevention and Rapid Re-Housing Program funds</li> </ul>	X	X	X
<ul style="list-style-type: none"> <li>▪ Contractual relationship with OSH and</li> <li>▪ Receives HUD McKinney-Vento Act funds and/or</li> <li>▪ Receives Homelessness Prevention and Rapid Re-Housing Program funds</li> </ul>	X	X	X

### Privacy, Confidentiality, and Security

This section is not applicable if the Agency is covered under the *Health and Insurance Portability and Accountability Act of 1996 (“HIPAA”)*. If the Agency is a HIPAA-covered entity, the Agency is required to operate in accordance with HIPAA regulations and is exempt from the privacy and security standards found in HUD’s Data and Technical Standards.

1. The Agency shall uphold relevant federal and state confidentiality regulations and laws that protect client records, including but not limited to the privacy and security standards found in HUD’s Data and Technical Standards.
2. The Agency shall adopt and comply with the attached *Notice of Privacy Practices for Use with the Homeless Management Information System (“HMIS Privacy Notice”)*. Agencies without a contractual relationship with OSH may use an Agency-specific alternative that complies with HUD’s baseline privacy standards.
3. The Agency shall prominently display the attached *Notice of Privacy Practices Posting* at each intake desk (or comparable location). Agencies without a contractual relationship with OSH may use an Agency-specific alternative that complies with HUD’s baseline privacy standards.
4. The Agency shall provide a copy of the *HMIS Privacy Notice* upon client request. Clients must acknowledge receipt by signing the attached *Acknowledgement Form*. Agencies without a contractual relationship with OSH may use an Agency-specific alternative. The Agency shall keep signed copies of the *Acknowledgement Form*.
5. The Agency shall provide reasonable accommodations to persons with disabilities and to persons with limited English proficiency to ensure their understanding of the *HMIS Privacy Notice* and/or *Acknowledgement Form*.



6. The Agency shall use client information in HMIS only to assist the Agency in providing adequate and appropriate services to the client.

## Data Collection

1. Direct Data Entry into HMIS
  - a. The Agency shall only solicit or input into HMIS client information that is essential to providing services to the client.
  - b. The Agency shall not knowingly enter false or misleading data under any circumstance, nor use HMIS with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.
  - c. The Agency shall ensure that all staff, volunteers and other persons who use HMIS are issued an individual User ID and password.
  - d. The Agency shall ensure that all staff, volunteers and other persons issued a User ID and password for HMIS receive confidentiality training, HMIS training, and comply with the attached *HMIS User Agreement* and the *HMIS Participation Agreement*.
  - e. The Agency shall enter information into HMIS on a timely (real-time or close to real time) basis.
2. Data Integration
  - a. The Agency shall submit client-level data to OSH for integration into HMIS in an agreed upon format no less than once annually.
  - b. All data shall be cleaned, updated, and formatted according to agreed upon data specifications prior to submission to OSH.
  - c. The data specifications shall be collaboratively developed by the Agency and OSH based on the Agency's existing database, the Agency's capacity to modify said database, and the Agency's data reporting requirements.
  - d. The Agency shall not knowingly submit false or misleading data under any circumstance.

## Data Output

1. OSH may provide aggregate or statistical data to the Agency on a periodic basis.
2. The Agency may make aggregate data available to other entities for funding or planning purposes pertaining to providing services to homeless persons in accordance with HUD's HMIS Data and Technical Standards. Such aggregate data shall not directly identify individual clients.
3. OSH will use HMIS data for homeless policy and planning decisions; in preparing federal, state or local applications for homelessness funding; to demonstrate the need for and effectiveness of programs; and, to obtain a system-wide view of program utilization.
4. If the Agency ceases to participate in HMIS, OSH will retain all HMIS client data previously entered/submitted by the Agency.

## Period of Agreement and Modification/Termination

This agreement will become effective when signed by both parties and will remain in effect until revoked in writing by either party. This agreement may be amended at any time by further written consent of both parties. This agreement may be terminated with 60 days written notice.

This agreement is not intended to and does not create any contractual rights or obligations with respect to the signatory or any other parties.

The parties hereby acknowledge the foregoing as the terms and conditions of their understanding.

**This page is intentionally left blank for double-sided printing.**

## User Agreement

This agreement between the City of Philadelphia (City) and the undersigned user of its Homeless Management Information System (HMIS) specifies policies, rights and responsibilities, and ethical guidelines with regard to the use of the HMIS.

## Background

The City's Office of Supportive Housing (OSH) is the entity designated by the US Department of Housing and Urban Development (HUD) as the administrator of Philadelphia's Continuum of Care (CoC)-wide HMIS. Entities using this HMIS currently include OSH and the agencies and organizations within the CoC. In accordance with HUD directives, HMIS participation will continue to expand to include additional agencies and organizations within the Philadelphia CoC.

## Training

Any individual who has not received OSH-approved training on how to properly use the system should not use the HMIS. All HMIS users will therefore be required to complete HMIS training prior to using the system. Any OSH user who feels he or she needs refresher training should contact their supervisor. Non-OSH employees should contact the HMIS Site Administrator from their organization.

## User Identifications Codes and Passwords

Upon successful completion of training and signing of this HMIS User Agreement, and subject to approval by the City, each HMIS user will be provided with a unique personal User Identification Code (User ID) and initial password to access the HMIS.

While the User ID provided will not change, HUD standards require that the initial password only be valid for the user's first access to the HMIS. Upon access with the initial password, the user will see a screen that will prompt the user to change the initial password to a personal password created by the user.

1. Only the user will know the personal password he or she creates. It is the user's responsibility to remember the password.
2. The password may not be stored in a publicly accessible location and written information pertaining to the User ID, password, or how to access the HMIS may not be displayed in any publicly accessible location.
3. The user is not permitted to divulge this password or to share this password with anyone.

## Security, Privacy, and Confidentiality of Client Data

The HMIS contains a range of Personal Protected Information (PPI) on clients and all such information must be treated carefully and professionally by all who access it. According to HUD, PPI is defined as "any information maintained by a Covered Homeless Organization about a living homeless client or homeless individual that: (1) Identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual." A Covered Homeless Organization (CHO) is defined as "any organization (including its employees, volunteers, affiliates, and associates) that records, uses or processes PPI on homeless clients for an HMIS." HMIS users are therefore subject to the following guidelines regarding the security, privacy, and confidentiality of client PPI.

1. The only individuals who may view or receive data from the HMIS are authorized users of the HMIS, users of other City databases for which clients have granted explicit informed consent to share data, and the individual clients to whom the data pertains. The User ID and password assigned to each individual HMIS user is to be used only for his or her access to the HMIS. An HMIS user may not allow access to the HMIS with his or her User ID and password to any other individual, regardless of whether or not the

individual is an authorized HMIS user or whether or not the individual has the same job role or the same level of access rights.

2. Each HMIS user may only view, obtain, extract, or use the data from the HMIS that is necessary to perform his or her job. Each HMIS user may only operate the HMIS using the Job Roles assigned to him or her.
3. Failure to properly log off the HMIS may result in a breach of system security and the privacy of client data. A computer that has the HMIS application open must therefore never be left unattended. Every computer that is used to access the HMIS must have a password-protected screen saver that automatically turns on when the computer is temporarily not in use. If an HMIS user will be away from the computer for an extended period of time, he or she is required to log off from the HMIS before leaving the work area in which the computer is located.
4. The guidelines regarding the security of paper or other hard copy containing PPI that is either generated by or for the HMIS, including, but not limited to reports, data entry forms, and signed consent forms are:
  - a. A CHO must supervise at all times any paper or other hard copy generated by or for the HMIS that contains PPI when the hard copy is in a public area.
  - b. When CHO staff is not present, the information must be secured in areas that are not publicly accessible.
  - c. Written information specifically pertaining to user access (e.g., User ID and password) must not be stored or displayed in any publicly accessible location.
5. Information obtained by the HMIS user from the HMIS is to remain confidential even after the HMIS user's relationship with the City and/or the participating agency that employs him or her changes or concludes for any reason.

## Data Quality Control

1. To the extent that clients and other agencies supplying information have provided accurate data, HMIS users are responsible for the accuracy of the data they enter into the HMIS.
2. HMIS users are required to enter data into the HMIS in a timely manner and in accordance with OSH performance standards and with any existing applicable agreements between OSH and its provider agencies.

## Problems with the HMIS

An HMIS user employed by a provider agency encountering a problem using the HMIS should contact his or her supervisor(s) and the HMIS Site Administrator from their organization. If the HMIS Site Administrator is not able to answer the question or solve the problem, he or she will contact the OSH Information Technology Helpdesk at 215-686-7110 or [HMIS@phila.gov](mailto:HMIS@phila.gov). An OSH HMIS user encountering a problem using the HMIS should contact his or her supervisor(s) and the OSH Information Technology Helpdesk at 215-686-7110 or [HMIS@phila.gov](mailto:HMIS@phila.gov).

**This page is intentionally left blank for double-sided printing.**

## Appendix

### Glossary of HMIS Definitions and Acronyms

**Annual Homeless Assessment Report (AHAR)** - Annual report to Congress, providing an in-depth look at the state of homelessness in the country. The AHAR is prepared by HUD and provides nationwide estimates of homelessness, including information about the demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons. The AHAR is based primarily on data from Homeless Management Information Systems.

**Annual Performance Report (APR)** - An annual report produced by grant recipients to track project progress and accomplishments including progress in moving homeless persons to self-sufficiency, services rendered, project goals and beds created. This report is required by HUD for all recipients of McKinney-Vento funding.

**Client** - An individual (adult or child) who has or is currently participating in a homeless assistance program.

**Continuum of Care (CoC)** – A collaborative funding and planning approach that helps communities plan for and provide, as necessary, a full range of outreach, emergency, transitional, and permanent housing and supportive services to address the various needs of homeless persons. HUD also refers to the group of community stakeholders involved in the decision making processes as the Continuum of Care.

**Covered Homeless Organization (CHO)** - Any organization (including its employees, volunteers, affiliates, and associates) that records, uses or processes PPI on homeless clients for HMIS. The requirements of HUD's Data and Technical Standards apply to all Covered Homeless Organizations.

**HMIS Data Quality** - The accuracy and completeness of all information collected and reported to the HMIS.

**HMIS Data Quality Plan** – Plan that standardizes expectations and provides guidance to HMIS-participating programs on the extent, completeness, and quality of HUD-required Data Elements entered into HMIS.

**HMIS Governance Agreement** - A governance agreement that designates the HMIS Lead Agency and outlines the responsibilities of the CoC and the HMIS Lead Agency.

**HMIS Lead Agency** - The entity designated by the Continuum of Care to administer and manage the HMIS. In Philadelphia, the Office of Supportive Housing is the HMIS Lead Agency.

**HMIS Participating Programs** - Any program that collects client-level data on homeless clients for inclusion in HMIS, including programs that enter data directly into HMIS and programs that submit data extract files for upload into HMIS.

**HMIS Participation Agreement** – An agreement that outlines the roles and responsibilities of the HMIS Lead Agency and HMIS Participating Agencies.

**Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act** - The HEARTH Act, which consolidates and amends three separate homeless assistance programs carried out under title IV of the McKinney-Vento Homeless Assistance Act into a single grant program that is designed to improve administrative efficiency and enhance response coordination and effectiveness in addressing the needs of homeless persons.

**Homeless Management Information Systems (HMIS)** – HMIS is a client information system designed to record and store client-level information on the characteristics and service needs of homeless persons. HMIS assists the

Philadelphia Continuum of Care to become better informed on the extent and nature of homelessness over time. Specifically, HMIS can be used to produce an unduplicated count of homeless persons, understand patterns of service use, and measure the effectiveness of homeless programs. This system is required by HUD for all Continuums of Care.

**HUD-required Data Elements** - The Universal Data Elements (UDE) and Program-Specific Data Elements (PDE) contained in the HUD HMIS 2010 Revised Notice as well as any subsequent revisions.

**HUD's Data and Technical Standards** – refers to HUD's HMIS regulations as found in:

- Federal Register, Vol. 69, No. 146, Part II, Department of Housing and Urban Development, Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice; Notice, July 30, 2004 (“HUD HMIS 2004 Final Notice”); and
- U.S. Department of Housing and Urban Development, Office of Community Planning and Development, Homeless Management Information System (HMIS), Data Standards, Revised Notice, March 2010 (“HUD HMIS 2010 Revised Notice”).

**McKinney- Vento Homeless Assistance (McKinney Vento) Act** - The Stewart B. McKinney Homeless Assistance Act (PL100-77) was the first -- and remains the only -- major federal legislative response to homelessness. It was reauthorized by President Obama on May 20, 2009 through the HEARTH Act.

**The Office of Supportive Housing** - The Office of Supportive Housing (OSH) is the public entity charged with the policy, planning, and coordination of the City's response to homelessness. Major areas of work include the coordination of the Homeless Continuum of Care and implementation of Philadelphia's Recalibrated Ten Year Plan to End Homelessness. OSH offers a wide array of services including emergency, transitional, and supportive housing to individuals, couples, and families.

**Privacy Notice** - A written, public statement of an agency's privacy practices. A notice informs clients of how personal information is used and disclosed.

**Personal Protected Information (PPI)** – Information that can be used to (1) identify either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual.

**The U.S. Department of Housing and Urban Development (HUD)** - A federal department created in 1965 to increase homeownership and support community development. Since 1987, HUD has been responsible for funding homeless programs which today comprise the Continuum of Care.

## Notice of Privacy Practices

**OFFICE OF SUPPORTIVE HOUSING  
NOTICE OF PRIVACY PRACTICES  
FOR USE WITH  
THE HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS)**

This notice describes the privacy policy and practices of the City of Philadelphia Office of Supportive Housing (OSH) as it relates to the Homeless Management Information System (HMIS). The employees of OSH and its contracted provider agencies collect personal information only when appropriate. OSH and its contracted provider agencies may use or disclose your information to provide you with services. OSH and its contracted provider agencies may also use or disclose personal information to comply with legal and other obligations.

As a client/consumer, you may request to inspect the electronic or paper record of the personal information about you that OSH or its contracted provider agencies maintain in HMIS. You may also ask OSH or its contracted provider agencies to correct inaccurate or incomplete information. You may ask OSH and its contracted provider agencies about the HMIS privacy policy or practices. OSH or its contracted provider agencies will respond to your questions and complaints.

Please read this entire notice for more details. A copy of the entire notice can be provided to you upon request.

### **A. What This Notice Covers**

1. This notice describes the privacy policy and practices of OSH and its contracted provider agencies.
2. The policy and practices in this notice cover the processing of protected personal information for clients of OSH and its contracted provider agencies.
3. Protected Personal Information is any information we maintain about a client that:
  - a. allows identification of a client/consumer directly or indirectly
  - b. can be manipulated by a reasonably foreseeable method to identify a specific client/consumer, or
  - c. can be linked with other available information to identify a specific client/consumer.

### **B. Why Collect Personal Information?**

1. Personal information is collected for a number of purposes including but not limited to the following:
  - a. to provide or coordinate services to clients/consumers
  - b. to locate other programs that may be able to assist clients/consumers
  - c. for functions related to payment or reimbursement from others for services that are provided
  - d. to operate our organization, including administrative functions such as legal, audits, personnel, oversight, and management functions
  - e. to comply with government reporting obligations
  - f. when required by law
2. OSH and its contracted provider agencies will only use lawful and fair means to collect personal information. If you seek assistance from OSH and its contracted provider agencies and provide us with personal information, it is assumed that you consent to the collection of information as described in this



notice. OSH and its contracted provider agencies may also get information about you from other sources, including the following:

- a. Individuals who are with you
  - b. Other private organizations that provide services
  - c. Government agencies
  - d. Telephone directories and other published sources
3. OSH and its contracted provider agencies will post notices (as per below) at various intake and service locations:

#### **NOTICE OF PRIVACY PRACTICE**

**OSH and its contracted provider agencies collect personal information directly from you for reasons that are discussed in our NOTICE OF PRIVACY PRACTICES. OSH and its contracted provider agencies may be required to collect some personal information by law or by organizations that provide funds to operate this program. Other personal information that is collected is important to run our programs, to improve services, and to better understand the needs of individuals being served. OSH and its contracted provider agencies only collect information that is considered to be appropriate.**

#### **C. Use and Disclosure of Personal Information**

1. OSH and its contracted provider agencies will use or disclose personal information for activities described in this part of the notice. We assume that you consent to the use or disclosure of your personal information for the purposes described here and for other uses and disclosures that we determine to be compatible with these uses or disclosures:
  - a. to provide or coordinate services to individuals (shelter, housing, case management, etc.)
  - b. for functions related to payment or reimbursement for services
  - c. to carry out administrative functions such as personnel oversight, management functions, and auditing purposes.
  - d. to create de-identified (anonymous) information that can be used for research and statistical purposes
  - e. when required by law
  - f. to avert a serious threat to health or safety if
    - i. we believe that the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public, and
    - ii. (2) the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including the target of the threat
  - g. to report victims of abuse when authorized by law.
  - h. for research purposes unless restricted by other federal and state laws.
  - i. to a law enforcement official for a law enforcement purpose (if consistent with applicable law and standards of ethical conduct).
  - j. for judicial and administrative proceedings in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena.

- k. to comply with government reporting obligations for homeless management information systems and for oversight of compliance with homeless management information system requirements.
- l. Before we make any use or disclosure of your personal information that is not described here, we seek your consent first.

#### **D. How to Inspect and Correct Personal Information**

1. You may inspect and have a copy of your personal information that we maintain. We will offer to explain any information that you may not understand.
2. We will consider a request from you for correction of inaccurate or incomplete personal information that we maintain about you. If we agree that the information is inaccurate or incomplete, we may delete it or we may choose to mark it as inaccurate or incomplete and to supplement it with additional information.
3. To inspect, get a copy of, or ask for correction of your information, by submitting your request in writing to your social worker/case manager.
4. We may deny your request for inspection or copying of personal information if:
  - a. the information was compiled in reasonable anticipation of litigation or comparable proceedings
  - b. the information is about another client/consumer
  - c. the information was obtained under a promise of confidentiality and the disclosure would reveal the source of the information, or
  - d. disclosure of the information would be reasonably likely to endanger the life or physical safety of any individual.
5. If we deny a request for access or correction, we will explain the reason for the denial. We will also include, as part of the personal information that we maintain, documentation of the request and the reason for the denial.
6. We may reject repeated or harassing requests for access or correction.

#### **E. Data Quality**

1. We collect only personal information that is relevant to the purposes for which we plan to use it. To the extent necessary for those purposes, we seek to maintain only personal information that is accurate, complete, and timely.
2. OSH will maintain any/all personal information as required by federal, state, or local laws.

#### **F. Complaints and Accountability**

1. We accept and consider questions or complaints about our privacy and security policies and practices. Any questions or complaints can be brought to your social worker/case manager.

If you feel your question/complaint is not fully addressed within a reasonable timeframe, you may register a complaint with the Office of Supportive Housing by calling 215-686-7181 during normal business hours.

# Information Request Form

## CITY OF PHILADELPHIA OFFICE OF SUPPORTIVE HOUSING HOMELESS MANAGEMENT INFORMATION SYSTEM

### INFORMATION REQUEST FORM

I understand that I have the right to inspect, get a copy of, or ask for correction of personal information that is maintained by the Office of Supportive Housing in the Homeless Management Information System (HMIS). Therefore, this is to request in writing the following (items with checkmarks):

- To inspect personal information in HMIS
- To have a copy of personal information that is maintained in HMIS
- To request correction of the information in HMIS as described below

---

---

---

---

Name \_\_\_\_\_

Date \_\_\_\_\_

Signature \_\_\_\_\_

Legal guardian or personal representative \_\_\_\_\_

Relationship \_\_\_\_\_

Requested information provided by (staff name) \_\_\_\_\_ on Date \_\_\_\_\_

Correction made in HMIS by (staff name) \_\_\_\_\_ on Date \_\_\_\_\_

## Acknowledgement of Privacy Practices Notice

**CITY OF PHILADELPHIA OFFICE OF SUPPORTIVE HOUSING  
HOMELESS MANAGEMENT INFORMATION SYSTEM  
NOTICE OF PRIVACY PRACTICES**

**ACKNOWLEDGEMENT**

I agree that I have been given an opportunity to review the Office of Supportive Housing Homeless Management Information System (HMIS) Notice of Privacy Practices.

I acknowledge that I may obtain a copy of the Notice of Privacy Practices upon request.

Name \_\_\_\_\_ Date \_\_\_\_\_

Signature \_\_\_\_\_

Legal guardian or personal representative \_\_\_\_\_

Relationship \_\_\_\_\_

Notice offered/acknowledgment refused \_\_\_\_\_ Staff initials \_\_\_\_\_

Reason for refusal if known

---

---

---



## NOTICE OF PRIVACY PRACTICES

OSH and its contracted provider agencies collect personal information directly from you for reasons that are discussed in our NOTICE OF PRIVACY PRACTICES. OSH and its contracted provider agencies may be required to collect some personal information by law or by organizations that provide funds to operate this program. Other personal information that is collected is important to run our programs, to improve services, and to better understand the needs of individuals being served. OSH and its contracted provider agencies only collect information that is considered to be appropriate.



# Information Security Policy - Access Control



## CITY OF PHILADELPHIA

Issued:	<b>Information Security Policy Access Control</b>	Policy Number: 10.00
Effective:		Approved By:
Revised:		
Revision #: 1.0		

### 1 PURPOSE

The purpose of this *policy* is to establish *general standards* for securing access to City of Philadelphia (City) *information systems* and *information*, for assigning *access rights* and *credentials* (user ID and passwords) based on job functions, and for limiting individual *users'* access in accordance with their *access rights*. These *general standards* are intended to ensure the *security of information* accessed, stored or processed by any City *information system*, including *portable devices* and *portable media*, and by *information systems* that are not owned or furnished by the City.

*Portable device* means any portable electronic computing device including but not limited to, notebook computers, hand-held computers, personal digital assistants (PDA), pagers, *messaging systems*, smartphones (e.g., BlackBerrys) or any other *portable device* that may be used to store City *information*.

*Portable media* means any portable material or device (other than an electronic computing device) that stores *information*, including, but not limited to floppy disks, CD-ROMS, DVDs, magnetic tape, external hard drives, memory devices, and microfilm or microfiche and USB external flash drives (e.g., pen drives, thumb drives or memory sticks).

*Access rights* means the privileges that a particular *user* has to access a City *information system* and/or the *information* on it, such as the right to read, write, modify or delete *information*, the right to use certain system commands, or the right to access certain file folders.

### 2 POLICY SCOPE

This *policy* applies to all City *information users*, *information systems*, and *information*; to *information systems* not owned or furnished by the City that are used to access, store or process City *information* (including *user-provided information systems*); to *users* who have access to City *information systems* or *information* and to the activities related to all stages in the *user access lifecycle*, from initial *user* request for access through final termination of access to *users* who no longer require it.

*Information systems* include, but are not limited to, mainframes, servers, desktop computers, notebook computers, hand-held computers, *portable devices*, *portable media*, pagers, *messaging systems*, distributed processing systems, *network* attached and computer controlled medical and laboratory equipment (i.e., embedded technology), telecommunication resources, *network equipment*, telephones, fax machines and printers. *Information systems* also include *operating system software*, *software applications* and *service bureaus* and *software applications* that are hosted by third parties and accessed through the *Internet*.

*User access lifecycle* means the activities related to requesting, authorizing, granting, establishing, documenting, reviewing and/or modifying and terminating a *user's* right to access City *information systems* and *information*.

### **3 USERS**

The *users* to whom this *policy* applies are all City personnel, including but not limited to, *agency heads* and *information technology (IT) administrators*, who request, authorize, grant, establish, document, review, modify and/or terminate a *user's* right to access City *information systems* and *information*, and all *information users* who have access to City *information systems* or *information*.

*Agency head* means the person who is responsible for the supervision and operation of a City *agency*. *Information technology administrators* means and includes all City *employees*, *contractors*, *third party users*, consultants, vendors and any other City *information users* who provide support and management to City *information systems* and the *information* created, received, transmitted, stored or deleted within.

*Information users* or *users* means and includes City *employees*; *information technology administrators* (or *information technology administrators* or *administrators*); officers and elected officials; City divisions, *agencies*, departments, boards and commissions; *City-related agencies*; *City contractors*; and *third party users* who use or have access to City *information systems* and *information*.

### **4 DEFINITIONS**

Italicized terms defined in this *policy* shall have the meanings in this *policy* that are here provided. Italicized terms not defined in this *policy* shall have the meanings contained in City Information Security Policy No. 13.00: *Glossary of Information Security Terms*.

### **5 POLICY**

This *policy* sets forth the *general standards* for securing access to City of Philadelphia (City) *information systems* and *information*, for assigning *access rights* and *credentials* (*User ID* and passwords) based on job functions, and for limiting the individual *user's* access in accordance with the *user's access rights*. The *general standards* set forth in this *policy* are intended to ensure the *security of information* accessed, stored or processed by any City *information system*, including *portable devices* and *portable media*, and by *information systems* that are not owned or furnished by the City. The *Information Security Group (ISG)* shall develop *specific standards*, as required, to implement the *general standards* in this *policy*.

The *general standards* in this *policy* shall apply to all City *agencies* and all *information systems* containing City *information*, whether or not they are owned or furnished by the City, including *user-provided information systems*. *Agency heads*, in consultation with the Division of Technology (DOT), shall develop and implement detailed *procedures* in accordance with this *policy* and specific *access standards* issued by the *Information Security Group* to control access to the City *information systems* and *information* for which they are responsible.

## 5.1 Standards of Compliance

### 5.1.1 User Access Lifecycle

The *access rights* available to the *user* shall be controlled by the *specific standards* established by the *Information Security Group* and the *general standards* contained in this *policy* governing each stage of the *user access lifecycle*. The *standards* for each stage shall be sufficient to prevent unauthorized access to *City information systems* and *information*. Authorization of *user access rights* and modification or removal of *access rights* are normally the responsibility of the *users' agency head* or designee, but the *Information Security Group* may assume this responsibility, with notice to the *agency head*, if the *Information Security Group* determines it is necessary to do so in order to protect the *security* of *City information systems* or *information*.

### 5.1.2 User Responsibilities

In accordance with City Information Security Policy No. 02.00: *Acceptable Use* and the *general standards* contained in this *policy*, *information users* are permitted to access and use *City information systems* and *information* only as required to carry out their specific job responsibilities, as determined by the head of the *users' agency*, and to conduct *City business*. *Users* are responsible for the following:

- a) Protecting their *user IDs* and passwords, and maintaining the *security* of *City information systems* and *information* they use and have access to. *Users* should avoid keeping a record (e.g., paper record, or electronic file) of passwords unless they can be stored securely and the method of storage has been approved by the *Information Security Group*;
- b) Not sharing computer accounts, passwords and other access *credentials* assigned to them;
- c) Selecting passwords in accordance with the *Information Security Group's specific standard* governing *user IDs* and passwords;
- d) Changing temporary passwords at the first logon;
- e) Terminating active sessions when finished, unless the session can be secured by a locking mechanism approved by the *Information Security Group* (e.g., the Windows computer locking feature) when unattended; and
- f) Protecting *information systems* and *information* under their control by using passwords or other security controls as required by the *Information Security Group* when not in use.

### 5.1.3 Network Access Control

The Division of Technology shall implement *security controls* sufficient to prevent unauthorized access and otherwise ensure the *security* of *City networks*, including at a minimum the following types of *security controls*:

#### a) Network Controls

At a minimum, access to *City networks* shall be governed by *security controls* that:

- i) Ensure the *security* of *information* passing to and from *City networks* over public *networks* or wireless *networks*, such as, but not limited to, *data encryption*;



- ii) Provide prevention and detection controls such as, but not limited to, firewalls and intrusion detection and prevention systems;
- iii) Require redundancy for *networks* that support *critical information systems*;
- iv) Restrict physical *network* connections (i.e., *network* board, jack and cable) and other *network* ports allowing connectivity to City *networks* to only authorized *users*; and
- v) Ensure that all *networks* and *network equipment*, including but not limited to routers and switches, require *user* authentication in accordance with Section 5.1.3(b) and (c) of this *policy* as a condition of access.

b) User Identification and Authentication

The *Information Security Group* shall establish a *specific standard* for creating *user* identification (*user ID*), and *user* accounts, including the method of authentication to be used on City *network equipment*. At a minimum, this *specific standard* shall include the following:

- i) The requirement that a unique *user ID* be established for each *user* that is sufficient to provide an audit trail and permit accountability for the *user's* actions performed on *networks* and *network equipment*; and
- ii) Criteria for password creation, including temporary passwords, such as, but not limited to, number and type of characters required in a password.

c) Secure Logon Standard

The *Information Security Group* shall establish a *specific standard* for logging onto City *networks* and *network equipment* sufficient to limit access to authorized *users*. The logon shall disclose no more *information* about the *network equipment* than is necessary to complete a secure logon. At a minimum, the logon *standard* shall:

- i) Prevent display of system or application identifiers until the logon process has been successfully completed;
- ii) Prohibit help messages during logon procedures that would aid an unauthorized *user* to access the *network* or *network equipment*, such as messages identifying the incorrect credential(s) during failed logon attempts;
- iii) Limit the number of unsuccessful logon attempts allowed before the *user* is shut out (e.g., three attempts);
- iv) Hide or disguise passwords as they are entered; and
- v) Prevent transmission of passwords in clear text over the *network*.

d) Remote Access Controls

The Division of Technology and *agency heads* shall implement *security controls* to protect City *information systems* and *information* accessed remotely. *Information users* who remotely access City *networks*, *information systems* or *information* are responsible for preventing unauthorized access by means they control. *Remote access* means the ability to access a City *network*, *information system* or *information* from outside the City's *networks*, or to access and control or manage an *information system* from another *information system* within the City's *networks*, using protocols that include, but are not limited to, virtual network computing (VNC), remote desktop protocol (RDP) or Citrix independent computing architecture (ICA).

- i) The Division of Technology shall develop *specific standards* specifying approved methods for *remote access*.
- ii) *Remote access* shall be authorized only for *users* whose job functions and specific City business needs require *remote access*.
- iii) Only *information technology administrators* and other *users* authorized by the *Information Security Group* may have *remote access* to maintenance and *diagnostic paths* into City *information systems*. *Contractors* shall not have such *remote access* unless authorized by the *Information Security Group*.
- iv) All *user accounts* for *remote access* shall be created and maintained in accordance with Sections 5.1.2 and 5.1.5 of this *policy*.

e) Wireless Access

No *user* may access any City *network*, *information system* or *information* by any wireless communications system or wireless equipment unless authorized by the Division of Technology. Wireless connections to City *networks*, *information systems* and *information* shall comply with *specific standards* developed by the *Information Security Group*, which shall at a minimum specify encryption and user authentication protocols.

f) Segregation of Networks

City *networks* shall be segregated into *logical network segments* by means of *network security controls* that restrict access between and among City *networks* and *information systems*. The controls shall permit such access only to the extent necessary for *users* to carry out their job functions and conduct City business, and shall restrict access based on the criticality and classification of the *information* resident on the *networks* and *information system(s)*.

- i) City *networks* shall be segregated into *logical network segments* based upon the criticality and classification of *information* stored or processed on the *network*, the degree of verification (or trust) needed for *users* to perform transactions using that *information* and business requirements. *Logical network segments* shall be protected by *network controls* sufficient to minimize or eliminate the impact of service disruptions in any segment to any other segment. *Logical network segments* shall be protected by routing, filtering and blocking *controls* sufficient to restrict access among segments except as authorized by the *Information Security Group*.
- ii) City *networks*, accessed through the *Internet*, the City's *intranet*, or a City or non-City *extranet* shall be protected by *network access controls* that establish *logical network segments* (such as, but not limited to, segregation into an internal *logical network segment* and an external *logical network segment*), each protected by a defined *security zone* or perimeter that controls access to and from the segment. The Division of Technology shall establish *security controls* within *security zones* and perimeters that are sufficient to provide, at a minimum, positive source and destination address verification, and filtering and blocking mechanisms to prevent access among *logical network segments* except as authorized by the *Information Security Group*.

g) Security of Network Devices

The *Information Security Group* and *agency information technology administrators* shall ensure that access to all City *network devices*, including, but not limited to, routers, switches, firewalls and access control servers, is controlled by means of *user IDs* and passwords for authentication,

and that such IDs and passwords are different from the IDs and passwords used for access to other City *information systems*.

#### 5.1.4 Portable Devices and Portable Media

All *agencies* shall follow the *specific standards* established by the *Information Security Group* for implementing *security controls* to protect *information* accessed, transmitted and stored on *portable devices* and *portable media*, whether or not issued by the City. Special care shall be taken to ensure the *security of portable devices* and *portable media* containing *confidential* or *for official use only information*.

#### 5.1.5 Information System Access Control

The Division of Technology and City *agency heads* shall implement *security controls* in City *information systems* to restrict access to authorized *users*. *Security controls* shall include at least the following:

a) Information Access Restriction

*Information* stored or processed on *information systems* shall have *security controls* that restrict the access of each *user* to only the *information* required to perform the *user's* job functions.

b) User Identification and Authentication

The *Information Security Group* shall establish a *specific standard* for creating *user* IDs and the method of authentication to be employed on City *information systems*. At a minimum, this *specific standard* shall:

- i) Require unique *user* identification for each *user* that is sufficient to provide an audit trail and permit accountability for the *user's* actions performed on *networks* and *network equipment*;
- ii) Specify criteria for password creation, including temporary passwords, such as, but not limited to, number and type of characters required in a password; and
- iii) Require a separate *user* ID and password for each *information system* accessed by the *user*.

c) Secure Logon Standard

The Division of Technology shall establish *specific standards* for logging onto *information systems* that are sufficient to prevent unauthorized access. The logon shall disclose no more *information* about the *information system* than is necessary to complete a secure logon. At a minimum, the logon standard shall:

- i) Prevent display of *system* or application identifiers until the logon process has been successfully completed;
- ii) Prohibit help messages during logon *procedures* that would aid an unauthorized *user* to access the *information system*, such as identifying incorrect *credential(s)* during failed logon attempts;
- iii) Limit the number of unsuccessful logon attempts allowed before the *user* is shut out (e.g., three attempts);
- iv) Hide or disguise passwords as they are entered; and
- v) Prevent transmission of passwords in clear text over any *network*.

d) Use of System Utilities

Access to and use of *system* utilities that can override authentication or other *information systems'* controls shall be restricted to *users* authorized by the *Information Security Group*.

e) Computer Timeout

The Division of Technology and *agency heads* shall ensure that *information systems* are configured to log off or lock a *user* or shut down after waiting a certain period of time without receiving expected input. The timeout period shall be determined by the *security* risks related to the *information system*, the criticality and classification of the *information* on the system, and the criticality of the *software applications* being used.

#### 5.1.6 Monitoring System Access, Use and Risk

The Division of Technology and *agency heads* shall ensure *security controls* are implemented and maintained to detect unauthorized or suspicious system events and identify and record *security incidents*. Such controls shall include, at a minimum, the following:

a) Event Logging

Audit logs shall record relevant *security* events and exceptions to provide for regular access control *monitoring* and to support any investigations of *security incidents*.

b) Assessment of Risk

The *Information Security Group* shall establish *specific standards* for *monitoring information systems* to ensure that *users* are carrying out only authorized activities. *Agencies* and the *Information Security Group* shall regularly review every City *information system* to identify and assess risks specific to the *software applications* resident on the *information system*. The review shall take into account the criticality of the *information system* and the *information* it processes, as well as the criticality of the *software applications*, the history of misuse of the *information system* (including *security incidents*), and the accessibility of the *information system* from other City *networks* and *information systems*.

c) Logging and Reviewing Events

The *information technology administrators* shall ensure that a regular review of system logs is performed in accordance with the *Information Security Group's specific standard* for such review to identify *system* events and exceptions that are suspicious and warrant further investigation. Such system log reviews shall not be performed by the *information technology administrators* who are responsible for the *information systems* being reviewed.

d) Time Synchronization

Time synchronization with the City's authorized time source shall be maintained for all City *information systems* in order to ensure the accuracy of audit logs.

#### 5.1.7 Exception Management

This *policy* is not intended to preclude the use and access of City *information systems* and *information* to meet any legitimate business need of the *user* or the *user's agency*. If an *agency* needs to transmit or access materials prohibited by this *policy* or otherwise to act contrary to the *policy* in order to conduct its

business and carry out its responsibilities, the *agency* is responsible for first obtaining approval for an exception to the *policy* from the *Information Security Group*.

## **6 ENFORCEMENT; DISCIPLINARY ACTION**

Each City *agency head* shall be responsible for enforcing compliance with this *policy* by *agency information users*.

*Information users* that violate this *policy* may be subject to disciplinary action, up to and including, termination of employment, in accordance with the disciplinary *policies* of the *information user's agency* and, for *information users* represented by the Fraternal Order of Police, International Association of Firefighters, District Council 47 or District Council 33, the terms of the applicable collective bargaining agreement.

If a City *contractor* or *third party user* knowingly or negligently commits or permits a material violation of this *policy*, the City may terminate the contract in accordance with its terms, and/or terminate the *contractor's* or *third party user's* access to City *information processing facilities, information systems* and *information*, in addition to any legal or remedial actions the City may take to enforce and protect its interests.

## **7 GETTING MORE INFORMATION**

Questions about this *policy* and other *information security* matters should be addressed to the *Information Security Group* (Email: [ISG@phila.gov](mailto:ISG@phila.gov) Phone: (215) 686-8180).

# Information Security Policy- Physical and Environmental Security



## CITY OF PHILADELPHIA

Issued:	<b>Information Security Policy Physical and Environmental Security</b>	Policy Number: 09.00
Effective:		Approved By:
Revised:		
Revision #: 1.0		

### 1 PURPOSE

The purpose of this *policy* is to define the minimum physical and environmental *security controls* required by the City of Philadelphia (City), including City *general standards* to be applied in the implementation of such *security controls*, to protect the *confidentiality, integrity and availability* of City *information processing facilities, information systems and information*. *Security controls* means and includes the safeguards or countermeasures to avoid, counteract or minimize *security risks*. *Security controls* may include, but are not limited to, identification badges; *information backup procedures; policy and procedures for employee separation from the City; and controls on physical network access*. Such controls are intended to prevent unauthorized disclosure of, access to, destruction or theft of, damage to and interference with City *information processing facilities, information systems and information*, including *information systems* that present special *security risks*, such as, but not limited to, *portable devices, portable media, and network equipment*.

### 2 POLICY SCOPE

This *policy* applies to all *information processing facilities* owned, leased, controlled, or used by the City; to all *information systems* owned, controlled, or used by the City; and to all *information* created, received, transmitted, stored and/or deleted by means of City *information systems*.

*Information systems* include, but are not limited to, mainframes, servers, personal computers, notebook computers, hand-held computers, *portable devices, portable media*, distributed processing systems, *network attached and computer controlled medical and laboratory equipment (i.e., embedded technology), telecommunication resources and systems, network equipment, telephones, fax machines and printers*. *Information systems* also include *operating system software, software applications and service bureaus and software applications* that are hosted by third parties and accessed through the *Internet*.

*Portable devices* include, but are not limited to, notebook computers, hand-held computers, *personal digital assistants (PDA), pagers, messaging systems, smartphones (e.g., Blackberry) or any other portable device* that may be used to store City *information*.

*Portable media* include, but are not limited to, floppy disks, CD-ROMs, DVDs, magnetic tape, external hard drives, external memory devices, microfilm or microfiche, and USB external flash drives (pen drives, thumb drives, flash drives or memory sticks).

*Network equipment* includes, but is not limited to, switches, *firewalls*, wireless access points, routers and cabling.

### 3 USERS

The *users* to whom this *policy* applies include all *City information users* who use and/or have access to *City information processing facilities, information systems and information*. *Information users* or *users* mean and include *City employees; information technology (IT) administrators (or information technology administrators or administrators); officers and elected officials; City divisions, agencies, departments, boards and commissions; City-related agencies; City contractors; and third party users* who use or have access to *City information processing facilities, information systems, and information*.

### 4 DEFINITIONS

Italicized terms defined in this *policy* shall have the meanings in this *policy* that are here provided. Italicized terms not defined in this *policy* shall have the meanings contained in City Information Security Policy No. 13.00: *Glossary of Information Security Terms*.

### 5 POLICY

*City Information processing facilities, information systems and information* shall at all times be protected by *security controls* sufficient to ensure their *confidentiality, integrity, and availability* and prevent unauthorized disclosure or access, damage, destruction, theft or interference. *Information users* are responsible for applying such *security controls* to the *information processing facilities, information systems and information* to which they control or have access.

#### 5.1 Standards for Compliance

##### 5.1.1 Secure Areas

Access to *City information processing facilities, information systems and network equipment* shall be secured with sufficient controls to protect them from unauthorized access, damage, destruction, theft and interference.

a) Physical Security Perimeter

A clearly defined *security* perimeter shall be established for each *City information processing facility*. The *security* perimeter shall provide a secure area within each *City information processing facility* to house *information systems and network equipment*.

b) Physical Access Control

Offices and rooms containing *confidential information or for official use only information* shall have effective access controls sufficient to ensure that only authorized persons may enter the *information processing facility* and/or access the *information systems or information* maintained in the facility. Such *security controls* may include, but are not limited to, electronic or mechanical locks, gates or doors controlled by electronic badges and security guards.

c) Identification Badges

All persons accessing a *City information processing facility*, including, but not limited to, *City employees, contractors and visitors*, shall be required to wear, in plain view, an identification badge.

d) Facility Access

Access to City *information processing facilities* and to any restricted area in the facilities shall be controlled in accordance with each facility's access management *procedures*. Access to a secure area shall be granted only to *information users* who require access to perform job duties, and shall be no greater in scope than is necessary for the performance of these duties.

The Department of Public Property (DPP) shall ensure that records of all persons obtaining access to any City *information processing facility*, including, but not limited to, visitors, *contractors* and *third party users*, are created and maintained. Reports summarizing such records shall be made available to *users' agency head* or designee, the Inspector General, Police Department, Internal Affairs Division, the Law Department, the Ethics Board, the District Attorney's Office and the *Information Security Group (ISG)*. Access reports may be used to investigate unauthorized access to or use of *information processing facilities* or *information systems*, and may be the basis for modifying or rescinding *access rights* or disciplinary action.

e) Facility Surveillance

Entrances and exits to City *information processing facilities* shall be equipped with surveillance devices placed and configured in accordance with City *standards* established by the Department of Public Property.

### 5.1.2 Information System Security

*Information systems* and *network equipment* shall be installed and maintained with *security controls* sufficient to protect the *confidentiality, integrity, and availability* of information systems and *network equipment*, and the *information* stored and/or processed on them, from unauthorized disclosure or access, damage, destruction, theft and interference.

a) Network Equipment

A secure area for *network equipment* shall be established in each *information processing facility* in accordance with City physical and environmental *security standards* established by the Department of Public Property and the Division of Technology (DOT).

b) Portable Devices and Media

*Users* are responsible for protecting all *portable devices* and *portable media* that contain City *information*, whether or not they were issued by the City. Such *portable devices* and *portable media* shall be stored securely when not in use to prevent theft, damage and unauthorized access, in accordance with *standards* established by the Division of Technology.

c) Information System Re-Use

Re-use of equipment and other *information systems* by another *user* or *agency* or sale or other transfer of used equipment to non-City persons or entities may be permitted only if all City *information* is first removed from the equipment in accordance with City *standards* established by the Division of Technology.

d) Power Supplies

*Agency heads*, in coordination with the Division of Technology, shall determine which *information systems, network equipment, telecommunications equipment* and other *critical systems* shall be equipped with an uninterruptable power supply (UPS) sufficient to ensure system *availability* in accordance with the *service level agreement (SLA)* defined for the *information system*.



e) Cabling

*Network* and communication cables to and from *information systems* shall comply with the Institute of Electrical and Electronics Engineers (IEEE) 802.3 -2006 domestic cabling *standard* and with any additional cabling *standards* established by the Department of Public Property and the Division of Technology to ensure the *availability* of City *information systems* and *network equipment*.

f) Environmental Damage

In accordance with City *standards* established by the Department of Public Property and the Division of Technology, *agency heads* shall ensure *information systems* and *network equipment* are installed, operated, maintained and stored in a manner that will protect against environmental risks, including, but not limited to, damage or destruction by fire, water, heat, humidity, electrical surges and static electric discharge. *Security controls* shall include, but are not limited to, fire detection and suppression equipment, electrical power conditioning, climate controls and other measures designed to protect against environmental damage.

A preventive maintenance program shall be established in accordance with City *standards* established by the Department of Public Property and the Division of Technology to ensure the proper function and adequate environmental quality of City *information processing facilities*, *information systems* and *network equipment*.

### **5.1.3 Securing Third Party Access to City Information Processing Facilities, Information Systems and Information**

The Division of Technology and the Department of Public Property shall develop *procedures* and protocols for ensuring the *security* of City *information processing facilities*, *information systems* and *information* accessed and/or used by persons and entities that are not *employees* or *agencies* of the City, including, but not limited to, City *contractors* and *third party users* (collectively, third parties). Such *procedures* and protocols shall include at least the following:

- a) No third party may have access to City *information processing facilities*, *information systems*, *network equipment* or *information* unless it has first fully executed a City contract for goods or services or *security agreement* containing terms and conditions approved by the *Information Security Group* and the City's Law Department.
- b) All third party access shall be controlled in accordance with Sections 5.1.1 (b), (c) and (d) of this *policy*.
- c) Contracts with third parties that manage or maintain City *information systems*, *network equipment* and/or *information* on an *outsourcing* basis shall include terms and conditions that require the third party to maintain the *integrity* and *security* of City *information*.
- d) Third parties that perform *outsourcing* functions for the City outside City premises shall be subject to a *security* audit by the City. No contract may be entered into with such a third party, and no access to any City *information processing facilities*, *information systems*, *network equipment* or *information* may be granted to such a third party, unless or until the Chief Information Security Officer reviews and approves the results of the *security* audit.

#### **5.1.4 Securing Visitor Access to City Information Processing Facilities, Information Systems, Network Equipment and Information**

The Department of Public Property and the Division of Technology shall develop *procedures* and protocols for ensuring the *security* of City *information processing facilities* and the *information systems* and *information* located in them from unauthorized access by visitors. Such *procedures* and protocols shall, at a minimum, require that physical access by visitors to any City *information system*, including *network equipment*, be controlled in accordance with Sections 5.1.1 (b), (c) and (d) of this *policy*, and specifically, that all visitors be escorted by authorized City *employees* whenever they have such physical access.

#### **5.1.5 Exception Management**

This *policy* is not intended to preclude or interfere with the use of City *information processing facilities*, *information systems* and *information* to meet the legitimate business needs of the *user* or the *user's agency*. If an *agency* or *user* needs to have access to *information processing facilities*, *information systems*, or *information* in a manner prohibited by this *policy* or otherwise to act contrary to the *policy* in order to meet legitimate business needs and carry out the responsibilities of the *agency* and the *user*, the *agency* is responsible for obtaining *Information Security Group* approval for an appropriate exception to the *policy*.

### **6 ENFORCEMENT; DISCIPLINARY ACTION**

Each City *agency* head shall be responsible for enforcing compliance with this *policy* by *agency information users*.

*Information users* that violate this *policy* may be subject to disciplinary action, up to and including, termination of employment in accordance with the disciplinary *policies* of the *information user's agency* and, for *information users* represented by the Fraternal Order of Police, International Association of Firefighters, District Council 47 or District Council 33, the terms of the applicable collective bargaining agreement.

If a City *contractor* or *third party user* knowingly or negligently commits or permits a material violation of this *policy*, the City may terminate the contract in accordance with its terms, and/or terminate the *contractor's* or *third party user's* access to City *information systems* and *information*, in addition to any legal or remedial actions the City may take to enforce and protect its interests.

### **7 GETTING MORE INFORMATION**

Questions about this *policy* and other *information security* matters should be addressed to the *Information Security Group* (Email: [ISG@phila.gov](mailto:ISG@phila.gov) Phone: (215) 686-8180).



PHA has provisions in both its Public Housing Admissions and Continued Occupancy Plan and Housing Choice Voucher Program Administrative Plans regarding Special Housing Initiatives.

## **PUBLIC HOUSING**

PHA maintains Central Waiting Lists managed by the Central Admissions Office. Pre-Applicants on the Central Waiting List can be housed at various developments throughout PHA. Eligible applicants are offered the next available unit, regardless of location.

PHA maintains a separate Referral Program (Special Programs) CWL. Applicants are referred directly to PHA under Special Programs or Allocations. These families cannot be listed on any other development (Site-based) Waiting List(s).

Families will be selected from the Waiting List based on the targeted funding, special housing initiatives, special preferences for which they qualify, income targeting requirements, and date and time of application.

Targeted populations are specific populations that receive priority admission for designated units/buildings, selected units, or through Special Programs/Allocations. PHA assists the City of Philadelphia in serving the homeless population through the Special Housing Initiatives (SHI) provision in the ACOP.

This provision gives PHA the authority to develop special housing initiatives that receive limited local preference through PHA Board approval. These special initiatives are targeted for specifically named households and may be based on PHA and community priorities or HUD targeted funding. In addition, special housing initiatives may include a defined number of Public Housing units that will be allocated to households meeting specific described criteria. Examples of special housing initiatives include Blueprint to End Homelessness and the Development Program Relocation Special Housing Initiative.

When referred to PHA, these families may have already been determined eligible based on the referring organization's criteria. However, these families must also meet PHA income and other eligibility requirements in order to be housed. In establishing special housing initiatives, PHA will determine the priority given to special housing initiative applicants, including, if appropriate, the ratio of admissions of standard applicants to special initiatives applicants.

*PHA Public Housing Admissions and Continued Occupancy Policy (ACOP) – Chapter 5: Applications, Waiting List and Tenant Selection. (As Approved June 19, 2014.)*



## HOUSING CHOICE VOUCHER PROGRAM

PHA administers special allocations of HCV Vouchers for specific groups, individuals and families needing rental assistance. An applicant must meet HCV eligibility requirements as well as qualify under the specific guidelines for special program(s). When HUD awards HCV funds for a specific category of applicants, PHA will assist these households in accordance with HUD's special instructions.

PHA is approved to participate in the Family Unification Program (FUP) by the U.S. Department of Housing and Urban Development (HUD). PHA has received additional FUP housing choice Vouchers under subsequent allocations by HUD. FUP housing choice Vouchers (FUP HCV) are Vouchers specifically for FUP-eligible families and youth, and FUP HCV are allocated to new FUP-eligible families and youth upon Voucher turnover.

The HUD-VASH program combines HUD HCV rental assistance for homeless veterans with case management and clinical services provided by the U.S. Department of Veterans Affairs (VA) at its medical centers and in the community. The VA refers eligible homeless veterans to PHA. PHA follows the VASH program requirements as published in the Federal Register under Docket No. FR-5213-N-01.

Subject to Board approval, PHA's Admin Plan authorizes the agency to enter into MOUs or other agreements with qualified partner organizations and/or establish Special Housing Initiatives that provide an admissions preference to the HCV Program. The number and type of housing opportunities, eligibility and admissions criteria, lease terms, rent payments and other terms and conditions may vary from program to program. The terms and conditions of each Special Housing Initiative shall be described in MOUs or other agreements subject to Board approval.

As part of the Blueprint to End Homelessness initiative, PHA makes housing opportunities available for families and individuals leaving transitional housing per the terms of the MOU with the City of Philadelphia dated April 2009, as amended.

PHA has established a limited preference category for families in the Blueprint program. This preference category will be capped so that on a fiscal year basis a total of 500 housing opportunities will be provided annually. PHA may adjust the mix of vouchers and public housing units in its sole discretion depending on availability and demand in each program. All other occupancy, rent, and other continued occupancy policies for the Public Housing or Housing Choice Voucher programs, as applicable, apply to these households.

*PHA Housing Choice Voucher Program Administrative Plan – Chapter 5: Application, Wait List and Tenant Selection. (As Approved June 19, 2014.)*

## **CHAPTER 5: APPLICATIONS, WAITING LIST AND TENANT SELECTION**

### **Overview**

This policy, along with the Occupancy Standards and Unit Offer policy comprise PHA's Public Housing Tenant Selection Plan.

When a family wishes to reside in Public Housing, the family must submit an application to PHA. The application process includes two phases: 1) the Preliminary Application (pre-application) or initial application which places the applicants on the Waiting List(s) and 2) the Full Application, which is completed after the applicant is selected from a Waiting List(s) and provides all the information necessary for the final determination of eligibility and suitability.

When a unit becomes available, PHA will select families from a Waiting List(s) in accordance with PHA policies.

PHA shall administer all Waiting Lists in accordance with applicable Fair Housing laws and PHA policies. No person in the United States shall, on the grounds of race, color, religion, sex, handicap, familial status or national origin be excluded from participation in, or denied the benefits of, or be otherwise subjected to discrimination under the PHA Public Housing program.

### **Applying for Assistance**

When pre-applications are being accepted, applicants may obtain pre-application forms at PHA's Admissions Office and Site Offices during established intake business hours. Families may request by telephone or by mail that a pre-application form be mailed. In addition, the pre-application can be downloaded from the PHA web-site.

Families can submit pre-applications electronically via the internet or kiosks located at the Central Admissions Office and Site Offices. Families may also submit pre-applications in person at PHA's Admissions Office and Site Offices during established intake business hours, via mail, fax or over the phone. Only completed pre-applications will be placed on a Waiting List(s).

PHA shall require as part of the pre-application that families provide only the information needed to make an initial assessment of the family's eligibility, and to determine the family's placement on a Waiting List. When selected from a Waiting List, the family will be required to provide, by way of the Full Application, all of the information necessary to establish family eligibility and the amount of rent the family will pay.

With respect to one or more development Waiting Lists, PHA may limit application and intake, suspend application intake and/or close its Waiting Lists in whole or in part.

### **Accessibility of the Application Process**

PHA will take steps to ensure that the pre-/full application processes are accessible to those people who might have difficulty complying with the normal, standard PHA pre-/full application process. This could include people with disabilities, certain elderly individuals, as well as persons with Limited English Proficiency (LEP). PHA will make reasonable accommodations to meet the needs of individuals with disabilities. The application-taking facility and the pre-/full application process will be fully accessible, or PHA will provide an alternate approach that provides full access to the process.

## **Placement on the Waiting List(s)**

All complete pre-applications shall be placed on the Waiting List(s) by date and time of pre-application, the type and size of the unit required based on occupancy guidelines and any applicable Special Programs and/or Allocations (see this ACOP for more information on Special Programs and/or Allocations). Each pre-application will be assigned a Client Identification Number. All applicants shall be provided with confirmation acknowledging the submission of the pre-application. Placement on the Waiting List(s) does not indicate the family is eligible for admission.

Incomplete pre-applications will not be placed on the Waiting List(s). Applicants will be notified of an incomplete pre-application and will be given an opportunity to complete the pre-application. If a completed pre-application is not submitted within a specified timeframe, the pre-application will not be entered into the Waiting List(s).

PHA will conduct preliminary screening for debt at the time of placement on the Waiting List(s). Families owing debt to the housing authority will be withdrawn from the Waiting List(s) unless the debt is paid in full. Families found to owe debt at the time of pre-application will have 90 days from the date of notification to pay the amount owed in full in order to remain on the Waiting List(s). If the applicant is already listed on other Waiting List(s) at the time a new pre-application is submitted and the debt is not paid in full within 90 days, all the applicant's Waiting List pre-applications will be withdrawn.

Applicants that have been withdrawn from the Waiting List(s) have to wait one (1) year before a new pre-application will be accepted by PHA for placement on the Waiting List(s).

PHA will not process applications from households if the family composition is such that PHA would not be able to offer an appropriately sized unit without overcrowding.

If a family is determined to be ineligible, after debt screening, PHA will send written notification of the ineligibility determination within a reasonable amount of time of receiving a completed pre-application. The notice will specify the reasons for ineligibility, will inform the family of its right to request an informal hearing, and explain the process for doing so as described in the PHA Grievance Procedures.

PHA will provide notification of receipt within ten (10) business days of receiving a completed pre-application. A final determination of eligibility and suitability will be made when the family is selected from a Waiting List and placed in a Ready Pool.

## **Managing the Waiting List(s)**

PHA will organize the Waiting List(s) to allow for the accurate identification and selection of families in proper order, according to the admissions policies described in this ACOP.

The Waiting List will contain the following information for each applicant listed:

- Name of each household member;
- Address;
- Client Identification Number;
- Social security number for each household member (if provided);
- Unit size required;
- Date of birth for each household member;

- Amount and source of annual income for household;
- Accessibility requirement, if disclosed in the pre-application;
- Date and time of pre-application;
- Household type (family, elderly, disabled);
- Sex of each family member;
- Primary language spoken in the household;
- Special Admissions and targeted populations, if applicable;
- Race and ethnicity of the head of household; and
- Waiting List(s) selected

## PHA Waiting Lists

**Central Waiting Lists (CWL):** PHA maintains Central Waiting Lists managed by the Central Admissions Office. Pre-Applicants on the Central Waiting List can be housed at various developments throughout PHA. Eligible applicants are offered the next available unit, regardless of location. Examples of CWLs are:

- **1<sup>st</sup> Available Unit (1<sup>st</sup> Available):** Applicants choosing not to apply at specific developments may choose to be offered the first available unit regardless of the development.
- **Referral Program (Special Programs):** Applicants are referred directly to PHA under Special Programs or Allocations. These families cannot be listed on any other development (Site-based) Waiting List(s).
- **ADA/504 Waiting List:** Applicant and tenant families verified as requiring units with accessible features are referred to the 1<sup>st</sup> available units that meet their needs. For detail about the unit offer process for accessible units, see the Centralized Tracking and Occupancy System section of this ACOP.
- **Site-Based Waiting List (SBWL):** Each PHA Public Housing development has a Waiting List. Pre-Applicants may choose up to five (5) developments where they would prefer to live. Applicants will only be listed at developments that have the bedroom size for which the family is authorized to occupy based on family composition. Applicant and tenant families verified as requiring units with accessible features may apply to a SBWL(s) in lieu of the ADA/504 Waiting List.

## Establishing and Maintaining Site-Based Waiting Lists

Prior to the implementation of SBWLs, current applicants will be given the opportunity to make SBWL selections or to select the 1<sup>st</sup> Available Unit Option under the Centralized Waiting List. Applicants will be given the option to enter their names on up to five (5) SBWLs if they choose not to select the 1<sup>st</sup> Available option. Applicants cannot be listed on the 1<sup>st</sup> Available Unit Waiting List and site lists at the same time.

An applicant may change their listing on SBWLs once a year; however, the applicant will not retain their date and time of application when changing lists. The applicant will be assigned a new date and time of application.

PHA will maintain SBWLs for each Public Housing development type in the agency inventory:

- Family Developments; and
- Senior (Older Adult) Designated

#### **Site-Based Waiting List Administration**

The Central Admissions Department will be responsible for:

- Accepting new pre-applications and updates, including placing pre-applicants on the Waiting Lists and updating existing applicant Waiting List records;
- Managing transfers;
- Managing the ADA/504 Waiting List;
- Managing application intake, screening and ready pool placement for special and targeted funded programs;
- Providing technical assistance to developments;
- Conducting marketing and outreach efforts;
- Monitoring Waiting List Activity Statistics;
- Quality Control on activities performed by Site-based/Development staff;
- Updating Waiting Lists; and
- Managing informal hearings for applicants.

Each development will be responsible for:

- Accepting new pre-applications and updates, including placing pre-applicants on the Waiting Lists and updating existing applicant Waiting List records;
- Selecting applicants from the Site-based/Development and 1<sup>st</sup> Available Unit Waiting Lists;
- Changes in the of Head of Household;
- Running Criminal and Credit Checks;
- Conducting Informal Hearings;
- Monitoring basic Waiting List activity statistics;
- Conducting Waiting List updates for all developments;
- Screening applicants; and
- Leasing applicants.



## **Closing and Opening the Waiting List(s)**

- **Closing a Waiting List**: PHA may close a Waiting List, in whole or in part, if PHA has enough applicants on a Waiting List to fill projected vacancies. PHA may close a list completely, or restrict intake by type of development, by size and type of dwelling unit.

PHA may make assessments, as deemed necessary, to determine the need to close the Waiting List.

When a Waiting List is closed, in whole or in part, PHA will not maintain a list of individuals who wish to be notified when the Waiting List is re-opened.

- **Opening a Waiting List**: If the number of applicants on a Waiting List drops below anticipated need (i.e. bedroom size, income level in order to meet income targeting requirements, etc.), PHA may reopen the Waiting List and begin taking new applications.

PHA will announce the reopening of a Waiting List at least ten (10) business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice. The notice will specify where, when, and how pre-applications are to be received.

PHA will give public notice by publishing the relevant information in suitable media outlets when opening and closing the Waiting List. All signs and advertisements will comply with PHA Affirmative Marketing policy found in this ACOP.

When a Waiting List(s) is opened for a specified time, PHA completed pre-application forms will be accepted as being submitted with the same date and time of application. Once a Waiting List(s) is closed, PHA will conduct a lottery to determine each applicant's rank on the Waiting List.

## **Family Outreach**

PHA will conduct outreach as necessary to ensure that PHA has a sufficient number of applicants on the Waiting list to use the Public Housing resources it has been allotted.

PHA outreach efforts will comply with fair housing requirements, including:

- Analyzing the housing market area and the populations currently being served to identify underserved populations;
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program; and
- Avoiding outreach efforts that prefer or exclude people who are members of a protected class.

PHA outreach efforts are designed to inform families about the availability of assistance under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers
- Developing informational materials and fliers to distribute to other agencies
- Providing application forms to other public and private agencies that serve the low income population

- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

PHA will monitor the characteristics of the population being served and the characteristics of the population as a whole in PHA's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

## **Updating the Waiting List(s)**

Applicants are responsible for updating pre-applications and full applications whenever there are changes in family composition, income, address or telephone number. Failure to timely update pre-applications and full applications may result in a delay in housing or the family being withdrawn from the Waiting List(s).

### **Reporting Changes in Family Circumstances**

While the family is on a Waiting List(s), the family must inform PHA of changes in income, family composition, and/or contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing. Failure to report these changes may affect a family's placement on the Waiting List(s) and could result in cancellation of the family's pre-application/application.

- Changes in a family's circumstances while on the Waiting List may affect the family's qualification for a particular bedroom size. When a family reports a change that affects their placement on a Waiting List, the Waiting List will be updated accordingly.
- If PHA is unable to reach a family based on the contact information provided, the family's application for housing assistance will be removed from the Waiting List(s).

If the original head of household changes (i.e. the HOH leaves the family or there is a switch in HOH) while the family is on the Waiting List, the family must complete an update to the pre-application and identify the new head of household. PHA will allow the family to keep their initial date and time of application if the new head of household is the spouse or co-head identified in the initial pre-application. If the new head of household is anyone other than the spouse or co-head listed on the initial pre-application, the family must submit a new pre-application, if the waiting list is open and will be given a new date and time of application. PHA may make exceptions to this policy and will evaluate exceptions on a case by case basis.

### **Family Break-Up**

When a family on the Waiting List(s) breaks up into two otherwise eligible families, only one of the new families may retain the original pre-application date. Other former family members may submit a new pre-application with a new pre-application date if the Waiting List(s) is open.

In the absence of a judicial decision, or an agreement among the original family members, the original head of household will retain the pre-application date. Exceptions to the policy will be made on a case by case basis and may include consideration of the following factors:

1. The interest of any minor children, including custody arrangements;
2. The interest of any ill, elderly, or disabled family members;

3. Any possible risks to family members as a result of domestic violence or criminal activity; and
4. The recommendations of social service professionals.

### **Purging the Waiting List(s)**

In order to have an adequate number of families, it is necessary to have current and updated Waiting List(s). PHA will review the Waiting List(s) on a regular basis to determine if an update and purge are necessary. If an update is needed, PHA will mail update questionnaires to families on the Waiting List(s) via first class mail, to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the Waiting List(s). The family's response must be in writing and may be delivered in person or by mail or other method as determined by PHA.

Eligible applicants who respond to an update questionnaire will be maintained on the Waiting List(s). Applicants who do not respond to an update questionnaire in the specified timeframe will be withdrawn (or purged) from the Waiting List(s).

Once established, SBWLs and the 1<sup>st</sup> Available Waiting List will be updated every 3 years, or as needed. The manner in which the Waiting List is updated will be based on a prescribed format that is established by PHA.

### **Removal from a Waiting List**

If an applicant fails to respond in the manner requested to an attempt by PHA to contact the applicant in writing, the applicant may be removed from the Waiting List(s) without further notice.

If the correspondence is returned by the post office with a forwarding address, it will be re-sent to the address indicated. If the family fails to respond in the manner requested by PHA within the prescribed time frame, the family will be removed from the Waiting List(s) without further notice.

If a family is removed from the Waiting List(s) because PHA has determined the family is not eligible for admission, a notice will be sent to the family's address of record as well as to any alternate address provided on the pre-application or subsequent updates. The notice will state the reasons the family was removed from the Waiting List(s) and will inform the family how to request an informal hearing regarding PHA's decision. Applicants who disagree with an action or inaction of PHA are entitled to an informal hearing if requested in a timely manner.

Applicants removed from the Waiting List(s) may reapply in one (1) year from the removal date.

PHA will remove applicants from the Waiting List(s) upon documented request from the applicant.

### **Removal from a Waiting List After Being Housed**

Once a family is housed in Public Housing, the family will be removed from all other PH Waiting Lists. However, a family may remain on the HCV and/or Tax Credit Site waiting lists. Additionally, the family will be subject to all applicable program screening and eligibility requirements. Applicants, as a reasonable accommodation, may request that their name remain on Waiting Lists once housed, and PHA, on a case-by case basis, will review these requests in order to accommodate the needs of a person with disabilities.

Reasonable accommodations may be provided if the reason for removing an applicant is related to a disability.

Applicants whose applications are rejected are entitled to an informal hearing if requested in a timely manner

### **Reinstatement to a Waiting List**

If a family is removed from a Waiting List(s) for failure to respond to PHA's attempt to contact the family by mail, PHA Management may reinstate the family at its former position if it is determined that the lack of response was due to PHA error, or to circumstances beyond the family's control. To be considered for reinstatement at their former position, the applicant must contact PHA within one (1) year of being removed from the applicable list.

If a family does not respond to a written attempt by PHA to make contact because of a family member's disability, PHA, upon verification of the family's request, will reinstate the applicant family to their former position on the Waiting List(s) as a Reasonable Accommodation.

It is PHA's policy to ensure that all families who express an interest in housing assistance are given equal opportunity to apply, and are treated in a fair and consistent manner  
When the Waiting List is continuously open, PHA will determine the applicant's rank on the Waiting List based on date and time of application.

### **Order of Selection**

Families will be selected from the Waiting List based on the targeted funding, special housing initiatives, special preferences for which they qualify, income targeting requirements, and date and time of application. See the Special Programs and Allocations chapter of this ACOP for further discussion.

When selecting applicants from the Waiting List for screening or from the Ready Pool for assignment of units, PHA will match the characteristics of the unit anticipated to be available (unit size, accessibility features, housing designation, and unit type) to the applicants on the Waiting List/in the Ready Pool. PHA will offer the unit to the highest ranking applicant who qualifies for that unit size or type, or who requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the Waiting List(s)/Ready Pool may receive an offer of housing ahead of families with an earlier date and time of application.

### **SBWL Applicant Selection Method**

- **1<sup>st</sup> Available Unit Option:** An applicant with an application date earlier than an applicant on a SBWL at a development with an available unit will be selected from the Waiting List for the unit at that property. For example, an applicant with an application date of March 1, 2007 who has selected the "1<sup>st</sup> Available Unit Option" will be selected from the Waiting List before any applicant on a SBWL with an application date and time after March 1, 2007 (this assumes that the selection is for the appropriate bedroom size and any other relevant unit features).
- **Site-Based Waiting Lists:** An applicant who has applied to be placed on the Waiting Lists at multiple developments will be selected from those respective lists by date and time of application. This only holds true if there are no applicants on the 1<sup>st</sup> Available Waiting List who have an earlier application date and time than the applicant on the top of a SBWL (this assumes that the selection is for the appropriate bedroom size and any other relevant unit features).

Once an applicant is selected from a SBWL for screening, the applicant's name will remain on the Waiting List(s) of other sites for which the applicant has applied until the applicant accepts a unit.

See Occupancy and Unit Offers policy found in this ACOP for policy related to SBWL unit offers.

## **Income Targeting MTW**

In lieu of HUD statutory requirements regarding income targeting, PHA shall: (i) ensure that at least 75 percent of the families assisted are very low-income families, as defined in section 3(b)(2) of the 1937 Act, (ii) assist substantially the same total number of eligible low-income families under MTW, as would have been served absent the demonstration, and (iii) maintain a comparable mix of families by family size, as would have been served or assisted had the amounts not been used under the demonstration.

## **Targeted Populations**

Targeted populations are specific populations that receive priority admission for designated units/buildings, selected units or through special Programs/Allocations.

### **Designated Housing**

**Senior (Elderly) Only Unit/Developments:** Elderly families will receive a priority in admission to units or buildings designated as elderly. No other families may be admitted to elderly designated properties. Only elderly families will be allowed to place their names on the Senior Only SBWLs.

### **Special Housing Initiatives (SHI)**

PHA may develop special housing initiatives that receive limited local preference through PHA Board approval. These special initiatives are targeted for specifically named households and may be based on PHA and community priorities or HUD targeted funding. In addition, special housing initiatives may include a defined number of Public Housing units that will be allocated to households meeting specific described criteria. Examples of special housing initiatives include Blueprint to End Homelessness and the Development Program Relocation Special Housing Initiative. See ACOP chapter on Special Programs and Allocations for more detail.

When referred to PHA, these families may have already been determined eligible based on the referring organizations criteria. However, these families must meet PHA income and other eligibility requirements in order to be housed. In establishing special housing initiatives, PHA will determine the priority given to special housing initiative applicants, including if appropriate, the ratio of admissions of standard applicants to special initiatives applicants.

## **Deconcentration of Poverty and Income-Mixing**

PHA has implemented a number of initiatives that, while the primary purpose is not deconcentration, collectively represent a comprehensive deconcentration policy focused on self-sufficiency and strengthening neighborhoods:

- Raising the incomes of families already living in Public Housing by offering and/or coordinating career training and increasing employment options through work with Community Partners;
- Attracting a greater mix of incomes through expanded and integrated community policing and lease enforcement efforts;
- Improving conditions in developments and communities where PHA housing exists, and

- Integrating homeownership and rental units using tax credit financing.

## **Notification of Selection**

PHA will notify the family by first class mail when it is selected from the Waiting List.

The notice will inform the family of the following:

- Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview;
- Who is required to attend the interview; and
- Documents that must be provided at the interview.

If a notification letter is returned to PHA with no forwarding address, the family will be removed from the Waiting List(s) without further notice. If selected for eligibility determination from a SBWL and the notification letter is returned, the family's applications on all the lists will be removed.

## **Application Interview**

Families selected from a Waiting List(s) are required to participate in an eligibility interview which includes the completion of a full application.

All household members aged 18 and older are required to attend the application interview. Verification of information pertaining to adult members of the household not present at the interview will not begin until signed release forms are returned to PHA.

PHA must have documentation that substantiates why an applicant has been selected for eligibility determination. For example, for Special Housing Initiatives, PHA would need a copy of a MOU and transmittal identifying the applicant family as being eligible for referral by the agency/organization making the referral. Another example is that PHA would need proof of age for elderly families being screened for designated housing.

When applicable, selection criteria will be verified in accordance with the verification policy of this ACOP. If the basis for selection cannot be verified, the applicant will be returned to the Waiting List, without the claimed selection criteria, retaining the same date and time of application.

The family must provide the information necessary to establish the family's eligibility, including suitability, and to determine the appropriate amount of rent the family will pay. The family must also complete required forms, provide required signatures, and submit required documentation. All members of the household who are 18 years or older are required to sign the HUD Release of Information form or other release form acceptable to HUD, PHA's release of information form related to Police Record Check, the Declaration of Citizenship form and any other documents or forms required by PHA. In addition, applicants will be required to sign verification forms necessary to solicit income, and family information, and utilities information. When a household member will turn 18 between the date of eligibility determination, but on or before the effective date of lease-up, PHA will have a parent/legal guardian sign any consent/release forms on behalf of that household member in order to authorize PHA to obtain their income verification and count applicable income.

Any required documents or information that the family is unable to provide at the time of the interview must be provided within five (5) business days from the date of the request. If the family is unable to

obtain the information or materials within the required time frame, the family may request an extension. PHA will allow extensions at its discretion. Applicants who fail to provide the required information within PHA established time frames (including any allowed extensions) will be withdrawn from all Public Housing Waiting List(s) based on the family's failure to supply information needed to determine eligibility. This does not apply to PAPMC or AME SBWLs. The family will be sent a notice of denial.

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

Interviews will be conducted in English. For Limited English Proficiency (LEP) applicants, PHA will provide translation services in accordance with PHA's LEP plan as found in this ACOP.

If the family is unable to attend a scheduled interview, the family should contact PHA in advance of the interview to schedule a new appointment. If a family does not attend a scheduled interview, PHA will schedule a second (2<sup>nd</sup>) interview. If the family does not attend the 2<sup>nd</sup> scheduled interview, the family will be withdrawn from the Waiting List(s).

## **Final Eligibility Determination**

PHA must verify all information provided by the family. Based on verified information, PHA will make a final determination of eligibility and will confirm that the family qualified for any special programs/allocations, targeted admissions, or selection preference, where applicable, that affected the order in which the family was selected from the Waiting List.

If PHA determines that the family is ineligible, PHA will send written notification of the ineligibility determination. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal hearing (See Grievance Procedures for more information).

Applicants who are denied admission are prohibited from applying and/or receiving housing assistance for one (1) year from the date of the denial.

If PHA determines that the family is eligible to receive assistance, PHA will select the family's name from the Waiting List according to the waiting list policies. PHA will provide the approximate date of occupancy insofar as that date can be reasonably determined. When a vacant unit of the appropriate development, size and type becomes available, PHA will make a unit offer through its Home Selection Day or Unit Assignment process.

## **Misrepresentation**

Any material misrepresentation on the part of an applicant revealed through the application process or otherwise, will result in a determination of ineligibility. The applicant shall be notified in writing of such determination by PHA and will be given the opportunity for an informal hearing.

## CHAPTER 5: APPLICATION, WAIT LIST AND TENANT SELECTION

### Overview

PHA's policies provide that all families interested in housing assistance be given equal opportunity to apply and be treated in a fair and consistent manner. PHA maintains a Master Waiting List to determine priority of placement into the HCV program. An applicant's place on the Waiting List is determined by the date and time of application. PHA maintains a single Waiting List for the tenant-based HCV program.

The application process includes two phases; the pre-application or initial application which involves placement on the Waiting List and the second phase which is referred to as full application and which includes verification of stated preferences and the final determination of eligibility.

### Applying for Assistance

When pre-applications are being accepted, families interested in applying for assistance must complete a pre-application form. Pre-applications will be made available, upon request, in an accessible format for persons with disabilities. All pre-applications will be date and time-stamped.

When the Waiting List (WL) is continuously open, families may apply on line or by calling PHA during established intake hours. Completed applications must be submitted on line or by phone. Applications must be complete in order to be accepted by PHA for processing. If an application is incomplete, PHA will notify the family of the additional information required. PHA may implement use of electronic submission of pre-applications via internet or kiosks located at the Central Admissions Office and Site Offices.

### Accessibility of the Application Process

PHA will take steps to ensure that the application process is accessible to those people who might have difficulty complying with the normal, standard PHA application process. This could include people with disabilities, certain elderly individuals, as well as persons with limited English proficiency (LEP). PHA will make reasonable accommodations to meet the needs of individuals with disabilities.

### Placement on the Waiting List

PHA will review the pre-application and place applicants on the Waiting List who have submitted complete pre-applications. No applicant has a right or entitlement to be listed on the Waiting List, or to any particular position on the Waiting List.

Placement on the Waiting List does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the Waiting List, submits a full application and passes all required screening elements.

When the wait list is continuously open, applicants will be placed on the Waiting List according to the date and time their complete pre-application is received by PHA. When the Waiting List is open for a finite period of time, PHA will notify applicants of the method for submitting applications and ordering applications on the wait list.



## **Organization of the Waiting List**

PHA's HCV Waiting List is organized in such a manner to allow PHA to accurately identify and select families for assistance in the proper order, according to the admissions policies described in this plan.

The Waiting List will contain the following information:

- Applicant name;
- Family unit size;
- Date and time of application;
- Qualification for any local preference (when preferences are adopted);
- Racial or ethnic designation of the head of household;
- Gross Household Income;
- Social Security Number (where applicable);
- Contact information for the household; and
- Date of birth for the head of household.

PHA will maintain a single Waiting List for the tenant-based HCV program. A family's decision to apply for, receive, or refuse other housing assistance will not affect the family's placement on the HCV Waiting List.

## **Opening the Waiting List**

Two weeks prior to opening the Waiting List, PHA will issue a public announcement, including the opening and closing dates for the Waiting List, which will be placed in a local newspaper of general circulation and also in minority media. The announcement will include information on where and when applications will be taken, and if applicable, any limitations on who may apply for available slots in the HCV program.

## **Closing the Waiting List**

PHA will close the Waiting List when the estimated waiting period for housing assistance for applicants on the list reaches 24 months for the most current applicants. Where PHA has particular preferences or funding criteria that require a specific category of family, PHA may elect to continue to accept applications from these applicants while closing the Waiting List to others.

## **Family Outreach**

PHA will conduct outreach as necessary to ensure that PHA has a sufficient number of applicants on the Waiting List to use the HCV resources it has been allotted.

PHA outreach efforts will comply with fair housing requirements, including:

- Analyzing the housing market area and the populations currently being served to identify underserved populations;
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program; and
- Avoiding outreach efforts that prefer or exclude people who are members of a protected class.

PHA outreach efforts are designed to inform qualified families about the availability of assistance under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers;
- Developing informational materials and fliers to distribute to other agencies;
- Providing application forms to other public and private agencies that serve the low income population; and
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities.

PHA will monitor the characteristics of the population being served and the characteristics of the population as a whole in PHA's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

## **Reporting Changes in Family Circumstances**

While the family is on the Waiting List, the family must immediately inform PHA of changes in contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing.

## **Change in the Head of Household while on the Waiting List**

If the original head of household changes (i.e. the HOH leaves the family or there is a switch in HOH) while the family is on the Waiting List, the family must complete an update to the pre-application and identify the new head of household. PHA will allow the family to keep their initial date and time of application if the new head of household is the spouse or co-head identified in the initial pre-application. If the new head of household is anyone other than the spouse or co-head listed on the initial pre-application, the family must submit a new pre-application, if the waiting list is open and will be given a new date and time of application. PHA may make exceptions to this policy and will evaluate exceptions on a case by case basis.

## **Family Break-Up or Split Households**

When a family on the Waiting List breaks up into two otherwise eligible families, only one of the new families may retain the original application date. Other former family members may make a new application with a new application date if the Waiting List is open.

In the absence of a judicial decision, or an agreement among the original family members, the original head of household will retain the application date. Exceptions to the policy will be made on a case-by-case basis and may include consideration of the following factors:

- The interest of any minor children, including custody arrangements,
- The interest of any ill, elderly, or disabled family members,
- Any possible risks to family members as a result of domestic violence or criminal activity; and
- The recommendations of social service professionals.

## **Updating the Waiting List**

In order to have an adequate number of families available for screening, it is necessary to have a current and updated Waiting List. PHA will review the Waiting List on a regular basis to determine if an update and purge are necessary. If an update is needed, PHA will mail update questionnaires to families on the Waiting List via first class mail, to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the Waiting List. The family's response must be in writing and may be delivered in person or by mail.

Eligible applicants who respond to the questionnaires will be maintained on the Waiting List.

## **Removal from the Waiting List**

Families that do not respond within the prescribed time period will be withdrawn from the Waiting List without further notice. If the notice is returned by the post office with no forwarding address, the applicant will be removed from the Waiting List without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. If the family fails to respond within the prescribed time frame, the family will be removed from the Waiting List without further notice.

When a family is removed from the Waiting List during the update process for failure to respond, no informal hearing will be offered. Such failures to act on the part of the applicant prevent PHA from making an eligibility determination; therefore no informal hearing is required.

PHA will remove applicants from the Waiting List upon documented request from the applicant. In such cases, no informal hearing is required.

If a family is removed from the Waiting List because PHA has determined the family is not eligible for admission, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application or subsequent updates. The notice will state the reasons the family was removed from the Waiting List and will inform the family how to request an informal hearing regarding PHA's decision. Applicants removed from the Waiting List may reapply in one year.

Reasonable accommodations may be provided if the reason for removing an applicant is related to a disability.

Applicants whose applications are rejected are entitled to an informal hearing if requested in a timely manner

Once a family is leased under the HCV Program, if the family has previously applied to Public Housing (PH), and/or Tax Credit Site waiting lists, the family may remain on the PH and/or Tax Credit Site waiting lists. The family must honor the two (2) year lease term.

## **Reinstatement to the Waiting List**

If a family is removed from the Waiting List for failure to respond, PHA Management may reinstate the family at its former position if it is determined that the lack of response was due to PHA error, or to circumstances beyond the family's control. To be considered for reinstatement at their former position, the applicant must contact PHA within one (1) year of being removed from the Waiting List.

If a family does not respond to an update because of a family member's disability, PHA, upon verification of the family's request, will reinstate the applicant family to their former position on the Waiting List as a Reasonable Accommodation.

## **Order of Selection from the Waiting List**

When an applicant's name is at the top of the Waiting List (WL), in accordance with PHA policies, they will be selected from the WL. Once selected, the applicant will be screened and an eligibility determination made. The applicant in the Ready Pool with the earliest date and time of eligibility will be offered the next available Voucher. If funds are not sufficient to house the family at the top of the Waiting List in accordance with PHA Subsidy Standards, no additional Vouchers will be issued until sufficient funds are available to cover the cost of the family's assistance.

It is PHA's policy to ensure that all families who express an interest in housing assistance are given equal opportunity to apply, and are treated in a fair and consistent manner. Families will be selected from the Waiting List based on the targeted funding, special housing initiatives, special preferences for which they qualify, income targeting requirements, and date and time of application.

When the Waiting List is continuously open, PHA will determine the applicant's rank on the Waiting List based on date and time of application.

## **Targeted Funding**

When HUD awards special funding for certain family types, families who qualify are placed on the Waiting List. When a specific type of funding becomes available, the Waiting List is searched for the first available family meeting the targeted funding criteria.

## **Income Targeting MTW**

For the HCV program Vouchers, the Agency shall: (i) ensure that at least 75 percent of the families assisted are very low-income families, as defined in section 3(b)(2) of the 1937 Act, (ii) assist substantially the same total number of eligible low-income families under MTW, as would have been served absent the demonstration, and (iii) maintain a comparable mix of families by family size, as would have been served or assisted had the amounts not been used under MTW. During the PHA fiscal year, not less than 75 percent of the families admitted to PHA's tenant-based voucher program from the PHA waiting list shall be extremely low income families.

## **Special Housing Initiatives (SHI)**

PHA may develop special housing initiatives that receive limited local preference through PHA Board approval. These special initiatives are targeted for specifically named households and may be based on PHA and community priorities or HUD targeted funding. In addition, special housing initiatives may

include a defined number of Housing Choice Vouchers that will be allocated to households meeting specific described criteria. Examples of special housing initiatives include Blueprint to End Homelessness and the Development Program Relocation Special Housing Initiative. See Admin Plan chapter on Special Programs and Allocations for more detail.

When referred to PHA, these families may have already been determined eligible based on the referring organizations criteria. However, these families must meet PHA income and other eligibility requirements in order to be housed. In establishing special housing initiatives, PHA will determine the priority given to special housing initiative applicants, including if appropriate, the ratio of admissions of standard applicants to special initiatives applicants.

## **Notification of Selection**

PHA will notify the family by first class mail when it is selected from the Waiting List. The notice will inform the family of:

- The date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview;
- Who is required to attend the interview; and
- Documents that must be provided at the interview.

If a notification letter is returned to PHA with no forwarding address, the family will be removed from the Waiting List. A notice of denial will be sent to the family's address on record.

## **Application Interview**

Families selected from the Waiting List are required to participate in an eligibility interview which includes completion of a full application.

All household members aged 18 years and older are required to attend the eligibility interview. Verification of information pertaining to adult members of the household not present at the interview will not begin until signed release forms are returned to PHA.

Households must complete a full application in order to participate in the HCV program. All information supplied by the family must be true and complete. All members of the household who are 18 years or older are required to sign the HUD Release of Information form or equivalent form, PHA's Release of Information form related to the Police Record Check, the Declaration of Citizenship form and any other documents or forms required by PHA. The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, as well as completing required forms, providing required signatures, and submitting required documentation.

Any required documents or information that the family is unable to provide at the time of the interview must be provided within five (5) business days from the date of the request. Applicants who fail to provide the required information within PHA established time frames will be withdrawn from the Waiting List based on the family's failure to supply information needed to determine eligibility. Such failure to act on the part of the applicant prevents PHA from making an eligibility determination; therefore, PHA will not offer an informal.

If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial.

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

If the family is unable to attend a scheduled interview, the family should contact PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, they will be denied assistance based on the family's failure to supply information needed to determine eligibility. A notice of denial will be issued in accordance with policies contained in this Plan.

## **Final Eligibility Determination**

PHA must verify all information provided by the family. Based on verified information, PHA will make a final determination of eligibility and will confirm that the family qualified for any special admission, targeted admission, or selection preference, where applicable, that affected the order in which the family was selected from the Waiting List.

If PHA determines that the family is ineligible, PHA will send written notification of the ineligibility determination. The notice will specify the reasons for ineligibility, and will inform the family of their right to request an informal review.

If a family fails to qualify for any criteria that affected the order in which it was selected from the Waiting List (i.e., targeted funding, extremely low-income), the family will be returned to its original position on the Waiting List. PHA will notify the family in writing that it has been returned to the Waiting List, and will specify the reasons for it.

If PHA determines that the family is eligible to receive assistance, PHA will place the family's name in the Ready Pool according to date and time of application. PHA will invite the family to attend a briefing at which time a Voucher will be available.

## CHAPTER 5: APPLICATION, WAIT LIST AND TENANT SELECTION

### Overview

PHA's policies provide that all families interested in housing assistance be given equal opportunity to apply and be treated in a fair and consistent manner. PHA maintains a Master Waiting List to determine priority of placement into the HCV program. An applicant's place on the Waiting List is determined by the date and time of application. PHA maintains a single Waiting List for the tenant-based HCV program.

The application process includes two phases; the pre-application or initial application which involves placement on the Waiting List and the second phase which is referred to as full application and which includes verification of stated preferences and the final determination of eligibility.

### Applying for Assistance

When pre-applications are being accepted, families interested in applying for assistance must complete a pre-application form. Pre-applications will be made available, upon request, in an accessible format for persons with disabilities. All pre-applications will be date and time-stamped.

When the Waiting List (WL) is continuously open, families may apply on line or by calling PHA during established intake hours. Completed applications must be submitted on line or by phone. Applications must be complete in order to be accepted by PHA for processing. If an application is incomplete, PHA will notify the family of the additional information required. PHA may implement use of electronic submission of pre-applications via internet or kiosks located at the Central Admissions Office and Site Offices.

### Accessibility of the Application Process

PHA will take steps to ensure that the application process is accessible to those people who might have difficulty complying with the normal, standard PHA application process. This could include people with disabilities, certain elderly individuals, as well as persons with limited English proficiency (LEP). PHA will make reasonable accommodations to meet the needs of individuals with disabilities.

### Placement on the Waiting List

PHA will review the pre-application and place applicants on the Waiting List who have submitted complete pre-applications. No applicant has a right or entitlement to be listed on the Waiting List, or to any particular position on the Waiting List.

Placement on the Waiting List does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the Waiting List, submits a full application and passes all required screening elements.

When the wait list is continuously open, applicants will be placed on the Waiting List according to the date and time their complete pre-application is received by PHA. When the Waiting List is open for a finite period of time, PHA will notify applicants of the method for submitting applications and ordering applications on the wait list.

## **Organization of the Waiting List**

PHA's HCV Waiting List is organized in such a manner to allow PHA to accurately identify and select families for assistance in the proper order, according to the admissions policies described in this plan.

The Waiting List will contain the following information:

- Applicant name;
- Family unit size;
- Date and time of application;
- Qualification for any local preference (when preferences are adopted);
- Racial or ethnic designation of the head of household;
- Gross Household Income;
- Social Security Number (where applicable);
- Contact information for the household; and
- Date of birth for the head of household.

PHA will maintain a single Waiting List for the tenant-based HCV program. A family's decision to apply for, receive, or refuse other housing assistance will not affect the family's placement on the HCV Waiting List.

## **Opening the Waiting List**

Two weeks prior to opening the Waiting List, PHA will issue a public announcement, including the opening and closing dates for the Waiting List, which will be placed in a local newspaper of general circulation and also in minority media. The announcement will include information on where and when applications will be taken, and if applicable, any limitations on who may apply for available slots in the HCV program.

## **Closing the Waiting List**

PHA will close the Waiting List when the estimated waiting period for housing assistance for applicants on the list reaches 24 months for the most current applicants. Where PHA has particular preferences or funding criteria that require a specific category of family, PHA may elect to continue to accept applications from these applicants while closing the Waiting List to others.

## **Family Outreach**

PHA will conduct outreach as necessary to ensure that PHA has a sufficient number of applicants on the Waiting List to use the HCV resources it has been allotted.

PHA outreach efforts will comply with fair housing requirements, including:



- Analyzing the housing market area and the populations currently being served to identify underserved populations;
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program; and
- Avoiding outreach efforts that prefer or exclude people who are members of a protected class.

PHA outreach efforts are designed to inform qualified families about the availability of assistance under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers;
- Developing informational materials and fliers to distribute to other agencies;
- Providing application forms to other public and private agencies that serve the low income population; and
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities.

PHA will monitor the characteristics of the population being served and the characteristics of the population as a whole in PHA's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

## **Reporting Changes in Family Circumstances**

While the family is on the Waiting List, the family must immediately inform PHA of changes in contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing.

## **Change in the Head of Household while on the Waiting List**

If the original head of household changes (i.e. the HOH leaves the family or there is a switch in HOH) while the family is on the Waiting List, the family must complete an update to the pre-application and identify the new head of household. PHA will allow the family to keep their initial date and time of application if the new head of household is the spouse or co-head identified in the initial pre-application. If the new head of household is anyone other than the spouse or co-head listed on the initial pre-application, the family must submit a new pre-application, if the waiting list is open and will be given a new date and time of application. PHA may make exceptions to this policy and will evaluate exceptions on a case by case basis.

## **Family Break-Up or Split Households**

When a family on the Waiting List breaks up into two otherwise eligible families, only one of the new families may retain the original application date. Other former family members may make a new application with a new application date if the Waiting List is open.

In the absence of a judicial decision, or an agreement among the original family members, the original head of household will retain the application date. Exceptions to the policy will be made on a case-by-case basis and may include consideration of the following factors:

- The interest of any minor children, including custody arrangements,
- The interest of any ill, elderly, or disabled family members,
- Any possible risks to family members as a result of domestic violence or criminal activity; and
- The recommendations of social service professionals.

## **Updating the Waiting List**

In order to have an adequate number of families available for screening, it is necessary to have a current and updated Waiting List. PHA will review the Waiting List on a regular basis to determine if an update and purge are necessary. If an update is needed, PHA will mail update questionnaires to families on the Waiting List via first class mail, to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the Waiting List. The family's response must be in writing and may be delivered in person or by mail.

Eligible applicants who respond to the questionnaires will be maintained on the Waiting List.

## **Removal from the Waiting List**

Families that do not respond within the prescribed time period will be withdrawn from the Waiting List without further notice. If the notice is returned by the post office with no forwarding address, the applicant will be removed from the Waiting List without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. If the family fails to respond within the prescribed time frame, the family will be removed from the Waiting List without further notice.

When a family is removed from the Waiting List during the update process for failure to respond, no informal hearing will be offered. Such failures to act on the part of the applicant prevent PHA from making an eligibility determination; therefore no informal hearing is required.

PHA will remove applicants from the Waiting List upon documented request from the applicant. In such cases, no informal hearing is required.

If a family is removed from the Waiting List because PHA has determined the family is not eligible for admission, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application or subsequent updates. The notice will state the reasons the family was removed from the Waiting List and will inform the family how to request an informal hearing regarding PHA's decision. Applicants removed from the Waiting List may reapply in one year.

Reasonable accommodations may be provided if the reason for removing an applicant is related to a disability.

Applicants whose applications are rejected are entitled to an informal hearing if requested in a timely manner

Once a family is leased under the HCV Program, if the family has previously applied to Public Housing (PH), and/or Tax Credit Site waiting lists, the family may remain on the PH and/or Tax Credit Site waiting lists. The family must honor the two (2) year lease term.

## **Reinstatement to the Waiting List**

If a family is removed from the Waiting List for failure to respond, PHA Management may reinstate the family at its former position if it is determined that the lack of response was due to PHA error, or to circumstances beyond the family's control. To be considered for reinstatement at their former position, the applicant must contact PHA within one (1) year of being removed from the Waiting List.

If a family does not respond to an update because of a family member's disability, PHA, upon verification of the family's request, will reinstate the applicant family to their former position on the Waiting List as a Reasonable Accommodation.

## **Order of Selection from the Waiting List**

When an applicant's name is at the top of the Waiting List (WL), in accordance with PHA policies, they will be selected from the WL. Once selected, the applicant will be screened and an eligibility determination made. The applicant in the Ready Pool with the earliest date and time of eligibility will be offered the next available Voucher. If funds are not sufficient to house the family at the top of the Waiting List in accordance with PHA Subsidy Standards, no additional Vouchers will be issued until sufficient funds are available to cover the cost of the family's assistance.

It is PHA's policy to ensure that all families who express an interest in housing assistance are given equal opportunity to apply, and are treated in a fair and consistent manner. Families will be selected from the Waiting List based on the targeted funding, special housing initiatives, special preferences for which they qualify, income targeting requirements, and date and time of application.

When the Waiting List is continuously open, PHA will determine the applicant's rank on the Waiting List based on date and time of application.

## **Targeted Funding**

When HUD awards special funding for certain family types, families who qualify are placed on the Waiting List. When a specific type of funding becomes available, the Waiting List is searched for the first available family meeting the targeted funding criteria.

## **Income Targeting MTW**

For the HCV program Vouchers, the Agency shall: (i) ensure that at least 75 percent of the families assisted are very low-income families, as defined in section 3(b)(2) of the 1937 Act, (ii) assist substantially the same total number of eligible low-income families under MTW, as would have been served absent the demonstration, and (iii) maintain a comparable mix of families by family size, as would have been served or assisted had the amounts not been used under MTW. During the PHA fiscal year, not less than 75 percent of the families admitted to PHA's tenant-based voucher program from the PHA waiting list shall be extremely low income families.

## **Special Housing Initiatives (SHI)**

PHA may develop special housing initiatives that receive limited local preference through PHA Board approval. These special initiatives are targeted for specifically named households and may be based on PHA and community priorities or HUD targeted funding. In addition, special housing initiatives may

include a defined number of Housing Choice Vouchers that will be allocated to households meeting specific described criteria. Examples of special housing initiatives include Blueprint to End Homelessness and the Development Program Relocation Special Housing Initiative. See Admin Plan chapter on Special Programs and Allocations for more detail.

When referred to PHA, these families may have already been determined eligible based on the referring organizations criteria. However, these families must meet PHA income and other eligibility requirements in order to be housed. In establishing special housing initiatives, PHA will determine the priority given to special housing initiative applicants, including if appropriate, the ratio of admissions of standard applicants to special initiatives applicants.

## **Notification of Selection**

PHA will notify the family by first class mail when it is selected from the Waiting List. The notice will inform the family of:

- The date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview;
- Who is required to attend the interview; and
- Documents that must be provided at the interview.

If a notification letter is returned to PHA with no forwarding address, the family will be removed from the Waiting List. A notice of denial will be sent to the family's address on record.

## **Application Interview**

Families selected from the Waiting List are required to participate in an eligibility interview which includes completion of a full application.

All household members aged 18 years and older are required to attend the eligibility interview. Verification of information pertaining to adult members of the household not present at the interview will not begin until signed release forms are returned to PHA.

Households must complete a full application in order to participate in the HCV program. All information supplied by the family must be true and complete. All members of the household who are 18 years or older are required to sign the HUD Release of Information form or equivalent form, PHA's Release of Information form related to the Police Record Check, the Declaration of Citizenship form and any other documents or forms required by PHA. The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, as well as completing required forms, providing required signatures, and submitting required documentation.

Any required documents or information that the family is unable to provide at the time of the interview must be provided within five (5) business days from the date of the request. Applicants who fail to provide the required information within PHA established time frames will be withdrawn from the Waiting List based on the family's failure to supply information needed to determine eligibility. Such failure to act on the part of the applicant prevents PHA from making an eligibility determination; therefore, PHA will not offer an informal.

If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial.

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

If the family is unable to attend a scheduled interview, the family should contact PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, they will be denied assistance based on the family's failure to supply information needed to determine eligibility. A notice of denial will be issued in accordance with policies contained in this Plan.

## **Final Eligibility Determination**

PHA must verify all information provided by the family. Based on verified information, PHA will make a final determination of eligibility and will confirm that the family qualified for any special admission, targeted admission, or selection preference, where applicable, that affected the order in which the family was selected from the Waiting List.

If PHA determines that the family is ineligible, PHA will send written notification of the ineligibility determination. The notice will specify the reasons for ineligibility, and will inform the family of their right to request an informal review.

If a family fails to qualify for any criteria that affected the order in which it was selected from the Waiting List (i.e., targeted funding, extremely low-income), the family will be returned to its original position on the Waiting List. PHA will notify the family in writing that it has been returned to the Waiting List, and will specify the reasons for it.

If PHA determines that the family is eligible to receive assistance, PHA will place the family's name in the Ready Pool according to date and time of application. PHA will invite the family to attend a briefing at which time a Voucher will be available.

# Philadelphia Continuum of Care HMIS Governance Charter

---

## Purpose

The purpose of this document is to serve as a governance charter for the oversight of the Homeless Management Information System (heretofore referred to as "HMIS"). This document is to serve as an agreement between the Philadelphia Continuum of Care (CoC) and the City of Philadelphia Office of Supportive Housing (OSH), the designated HMIS Lead Agency. The provisions of this charter shall go into effect immediately.

## Responsibilities of the Philadelphia Continuum of Care

As established in the CoC Program interim rule, the Continuum of Care must:

1. Designate a single Homeless Management Information System (HMIS) for the Philadelphia CoC;
2. Designate a single eligible applicant to manage its HMIS, which is known as the HMIS Lead;
3. Review, revise, and approve privacy, security, and data quality plans for the HMIS;
4. Ensure the consistent participation of CoC Program funded recipients and subrecipients in the HMIS; and
5. Ensure HMIS is administered in compliance with requirements prescribed by HUD.

The Philadelphia CoC shall carry out its responsibilities through the work of Office of Supportive Housing (OSH) staff, the CoC Board, the Advisory Committee, and HMIS HEARTH Data Subcommittee.

## Designations

The Philadelphia CoC designates the City of Philadelphia Office of Supportive Housing as the HMIS Lead Agency to operate the Philadelphia CoC's HMIS.

The Philadelphia CoC designates ClientTrack™ operated by ClientTrack, Inc. as the official HMIS for the Philadelphia CoC.

## Responsibilities of the HMIS Lead Agency

The HMIS Lead Agency shall:

1. Ensure the operation of and consistent participation by recipients of funds from federal partners and their respective programs in the effort to end homelessness, which includes 1) U.S. Department of Health and Human Services (HHS), 2) U.S. Department of Housing and Urban Development (HUD), and 3) U.S. Department of Veterans Affairs (VA). Duties include:
  - a. Establishing the HMIS which includes the selection of the vendor and software;
  - b. Conducting oversight of the HMIS;
  - c. Taking corrective action, if needed, to ensure that HMIS is compliant with all federal standards;
  - d. Making recommendations for changes to the HMIS in order to better support the data reporting needs and requirements of the Philadelphia Continuum of Care and the HMIS participating agencies.
  - e. Adopting written policies and procedures for the operation of the HMIS that apply to the HMIS Lead, the HMIS Participating Agencies, and the Continuum of Care. At least once annually or as required by HUD, submit to the Philadelphia CoC an unduplicated count of clients served and an analysis of the unduplicated counts;
  - f. Submit reports to HUD as required;
  - g. Developing a privacy policy that, at a minimum, includes: data collection limitations; purpose and use limitations; allowable uses and disclosures; openness description; access and correction standards; accountability standards; protections for victims of domestic violence, dating violence, sexual assault,

## HMIS Governance Charter

and stalking; and such additional information and standards as may be established by HUD in notice. Every organization with access to protected identifying information must implement procedures to ensure and monitor its compliance with applicable agreements and the requirements of this part, including enforcement of sanctions for noncompliance.

- h. Requiring the HMIS vendor and software to comply with HMIS standards issued by federal partners as part of its contract.
2. Execute a written HMIS Participation Agreement with each HMIS participating agency, which includes:
    - a. Obligations and authority of HMIS Lead Agency and each HMIS participating agency;
    - b. Requirements of the security plan with which each HMIS participating agency must abide;
    - c. Requirements of the privacy policy with which each HMIS participating agency must abide;
    - d. Sanctions for violating the HMIS Participation Agreement (*e.g.*, imposing a financial penalty, requiring completion of standardized or specialized training, suspending or revoking user licenses, suspending or revoking system privileges, or pursuing criminal prosecution);
    - e. Agreement that HMIS Lead Agency and HMIS participating agencies will process Protected Identifying Information consistent with the agreement; and
    - f. HMIS Participation Agreement may also address other activities to meet local needs.
  3. Serve as the applicant to HUD for grant funds to be used for HMIS activities for the Philadelphia Continuum of Care, as directed by the Philadelphia Continuum of Care, and enter into a grant agreement with HUD to carry out the HUD-approved activities;
  4. Monitor and enforce compliance by all HMIS participating agencies with all federal requirements and report on compliance to the Philadelphia Continuum of Care Advisory Committee and federal partners;
  5. Monitor data quality and take necessary actions to maintain input of high-quality data from all HMIS Participating agencies.
  6. Submit a security plan, a data quality plan, and a privacy policy to the Philadelphia Continuum of Care Board for approval within 6 months of the effective date of the HMIS final rule and within 6 months after the date that any change is made to the local HMIS. The HMIS Lead Agency must review and update the plans and policy at least annually. During this process, the HMIS Lead Agency must seek and incorporate feedback from the Philadelphia Continuum of Care and from the HMIS participating agencies. The HMIS Lead must implement the plans and policy within 6 months of the date of approval by the Philadelphia Continuum of Care Board.

## **Responsibilities of the CoC HMIS HEARTH Data Subcommittee**

The HMIS Subcommittee shall work with the HMIS Lead to:

1. Develop, annually review, and, as necessary, make revision recommendations for Philadelphia CoC Board approval a privacy, security, and data quality plans, as well as any other HMIS policies and procedures required by federal partners;
2. Develop for Philadelphia CoC Board approval, and implement a plan for monitoring the HMIS to ensure that:
  - a. All HMIS Participating Agencies consistently participate in HMIS;
  - b. HMIS is satisfying the requirements of all regulations and notices issued by federal partners;
  - c. The HMIS Lead is fulfilling the obligations outlined in its HMIS Governance Charter and Agreement with the Philadelphia CoC, including the obligation to enter into written participation agreements with each contributing HMIS organization.
3. Oversee and monitor HMIS data collection and production of the following reports:
  - a. Sheltered point-in-time count;

HMIS Governance Charter

- b. Housing Inventory Chart;
- c. Annual Homeless Assessment Report (AHAR);
- d. Annual Performance Reports (APRs); and
- e. Data Quality Monitoring Reports

**Responsibilities of the HMIS Participating Agencies**

HMIS Participating Agencies shall:

1. Comply with federal HMIS regulations as found in:
  - a. Federal Register, Vol. 69, No. 146, Part II, Department of Housing and Urban Development, Homeless Management Information Systems (HMIS); Data and Technical Standards Final Notice; Notice, July 30, 2004 ("HUD HMIS 2004 Final Notice"); and
  - b. U.S. Department of Housing and Urban Development, Office of Community Planning and Development, 2014 Homeless Management Information System (HMIS) Data Standards: Dictionary and Manual, Version 2.1, August 2014 ("2014 HMIS Data Standards"); and
  - c. Any subsequent revisions either notice.
2. Comply with the Homeless Management Information Participation Agreement;
3. Comply with all policies and procedures that are developed by the HMIS Lead Agency, including: data quality, privacy, and security plans;
4. Participate in the Philadelphia CoC Data Quality Monitoring efforts by implementing internal processes to reduce the percentage of client records containing null, don't know, and refused values and to ensure valid program entry and exit dates are entered into HMIS in a timely fashion.

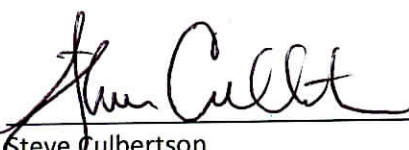
**Duration**

The duration of this charter shall last until terminated by either Party. This charter must be reviewed annually and updated as needed.

This charter was originally approved by the Philadelphia CoC on December 7, 2012 and was last approved by the Philadelphia CoC Board on November 5, 2015.

  
\_\_\_\_\_  
Marie S. Nahikian  
Director, City of Philadelphia Office of Supportive Housing

11-5-15  
Date

  
\_\_\_\_\_  
Steve Culbertson  
Chairperson, Philadelphia Continuum of Care Board

11/5/15  
Date