

ORANGE COUNTY  
CONTINUUM OF CARE BOARD MEETING  
Wednesday, October 28, 2026  
2:00 p.m. – 5:00 p.m.

**Location:**

**County Administration South (CAS) Building  
County Conference Center  
425 West Santa Ana Blvd. Room 104/106  
Santa Ana, CA 92701-4599  
[Click Here](#) for parking information.**

**Virtual Meeting Option\*:**

**Zoom Meeting Link: [Click here for meeting link](#)  
Join by phone: +1 669 444 9171  
Webinar ID: 917 1260 5590**

***\*Listen-in option only***

## AGENDA

**Board Members**

Judson Brown, City of Santa Ana  
Dr. Kelly Bruno-Nelson, CalOptima Health  
Andrew Crowe, Scholarship Prep  
Dr. Shelby Feliciano-Sabala, Project Hope Alliance  
Kelita Gardner, Second Baptist Church of Santa Ana  
Nichole Gideon, Individual  
Becks Heyhoe-Khalil, OC United Way  
Marisol Johnson, Dayle McIntosh Center  
Sandra Lozeau, City of Anaheim

Melanie McQueen, PATH  
Dr. Tiffany Mitchell, Orangewood Foundation  
[Secretary]  
Nishtha Mohendra, Friendship Shelter [Vice Chair]  
Robert “Santa Bob” Morse, Individual  
Jason Phillips, Individual  
Maricela Rios-Faust, Human Options [Chair]  
Tim Shaw, Individual  
Dr. Shauntina Sorrells, Individual

In compliance with the Americans with Disabilities Act, and County Language Access Policy, those requiring accommodation and/or interpreter services for this meeting should notify the Office of Care Coordination 72 hours prior to the meeting at (714) 834-5000 or email [CareCoordination@ceo.oc.gov](mailto:CareCoordination@ceo.oc.gov). Requests received less than 72 hours prior to the meeting will still receive every effort to reasonably fulfill within the time provided.

Supporting documentation is available for review by the public at least 72 hours prior to regular meetings and at least 24 hours prior to special meetings of the Continuum of Care (CoC) Board. Those wishing to review supporting documentation can visit the CoC Webpage [here](#) or the lobby of the County Administration North (CAN) Building, located 400 West Civic Center Drive, Santa Ana, CA 92701-4599, and request a copy of the

meeting materials from the Office of Care Coordination during normal business hours of 8:00 a.m. – 5:00 p.m. Monday through Friday (excluding holidays).

**Call to Order** – Maricela Rios-Faust, Chair

**Board Member Roll Call** – Dr. Tiffany Mitchell, Secretary

**Public Comments:** Members of the public may address the CoC Board on items listed within this agenda or matters not appearing on the agenda so long as the subject matter is within the jurisdiction of the CoC Board. Members of the public may address the CoC Board with public comments on agenda items in the business calendar after the agenda item presentation. Comments will be limited to three minutes. If there are more than five public speakers, this time will be reduced to two minutes. Members of the public utilizing interpreter services will be given double the amount of time to provide public comment.

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**Board Member Comments:** Members of the CoC Board may provide comments on matters not appearing on the agenda so long as the subject matter is within the jurisdiction of the CoC Board.

### **CONSENT CALENDAR**

1. Approve CoC Board Meeting Minutes from September 23, 2026.
2. Receive and file the CoC Strategic Plan monthly update.

### **BUSINESS CALENDAR**

1. **Domestic Violence Awareness Month** – Sara Behmerwohld, Chief Operations Officer, Human Options and Sharon Wie, Director of Programs, Interval House
2. **2026 CoC Nominating Ad Hoc Recommendation** – Felicia Boehringer, CoC Administrator, Office of Care Coordination and 2026 CoC Nominating Ad Hoc
  - a. Approve revisions to the CoC Board responsibilities, composition, nominating and selection process, and qualifications sections detailed in the Orange County CoC Governance Charter, as recommended by the 2026 CoC Nominating Ad Hoc.
  - b. Overview of the CoC Board nomination and selection process.
3. **Policies, Procedures and Standards (PPS) Committee Recommendation** – Erin DeRycke, Director, Data Analytics, 2-1-1 Orange County (211OC); Zulima Lundy, Director of Operations, Office of Care Coordination; and Nishtha Mohendra, PPS Committee Chair

- a. Approve revisions to the Homelessness Management Information System (HMIS) Policies and Procedures, inclusive of changes to the HMIS Data Quality Plan, Notice Regarding Collection of Personal Information, and Participating Agency Agreement, as recommended by the PPS Committee.
- 4. **Foster Youth to Independence (FYI) Voucher Memorandum of Understanding (MOU) with the City of Garden Grove Housing Authority** – Zulima Lundy, Director of Operations, Office of Care Coordination
  - a. Approve the MOU between City of Garden Grove Housing Authority, County of Orange Social Services Agency, and the Orange County Continuum of Care regarding the implementation of FYI Vouchers.
  - b. Authorize the CoC Board Chair and the Collaborative Applicant to execute the MOU on behalf of the Orange County CoC.
- 5. **HMIS Lead Update and Recommendation** – Erin DeRycke, Director, Data Analytics, 211OC, Orange County United Way
  - a. Approve Orange County United Way, as the HMIS Lead, to renew contract with Bitfocus for Clarity Human Services, the software platform utilized for HMIS in the Orange County CoC, for the term of October 30, 2026, through October 29, 2031.
  - b. CoC Dashboard Update
- 6. **Homeless Housing, Assistance and Prevention (HHAP) Program** — Zulima Lundy, Director of Operations, Office of Care Coordination
  - a. HHAP Rounds 3 – 6 obligations and expenditures update
  - b. Emergency Shelter Operations and Services contracts update
  - c. HHAP Round 7 update
- 7. **Fiscal Year (FY) 2026 CoC Program Notice of Funding Opportunity (NOFO) Update** — Zulima Lundy, Director of Operations, Office of Care Coordination
- 8. **CoC Strategic Plan: Coordinated Entry System (CES) Evaluation Update** — Dr. Shauntina Sorrells, Strategy Owner; Nishtha Mohendra, Strategy Owner; and Zulima Lundy, Director of Operations, Office of Care Coordination
- 9. **Orange County Homelessness Updates** – Douglas Becht, Director and Felicia Boehringer, CoC Administrator, Office of Care Coordination
  - a. System of Care Update
  - b. CoC Update

**Next Meeting:** Wednesday, November 18, 2026, from 2:00 p.m. – 5:00 p.m.

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## MINUTES

**Board Members**

Judson Brown, City of Santa Ana  
Dr. Kelly Bruno-Nelson, CalOptima Health  
Andrew Crowe, Scholarship Prep  
Dr. Shelby Feliciano-Sabala, Project Hope Alliance  
Kelita Gardner, Second Baptist Church of Santa Ana  
Nichole Gideon, Individual  
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**Call to Order** – Maricela Rios-Faust, Chair

Chair Maricela Rios-Faust called the meeting to order at 2:02 p.m.

**Board Member Roll Call** – Dr. Tiffany Mitchell, Secretary

Present: Judson Brown, Dr. Shelby Feliciano-Sabala, Kelita Gardner, Nichole Gideon, Becks Heyhoe-Khalil, Marisol Johnson, Sandra Lozeau, Melanie McQueen, Dr. Tiffany Mitchell, Nishtha Mohendra, Robert “Santa Bob” Morse, Jason Phillips, Maricela Rios-Faust, Tim Shaw, and Dr. Shauntina Sorrells.

Absent Excused: Dr. Kelly Bruno-Nelson

Absent: Andrew Crowe

Tim Shaw arrived during Public Comments. Becks Heyhoe-Khalil arrived during Business Calendar Item 1. Judson Brown left during Business Calendar Item 6 and did not vote on Business Items 6 and 7. Nichole Gideon left during Business Calendar Item 7 and did not vote on Business Item 7.

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- No public comments.

**Board Member Comments:** Members of the CoC Board may provide comments on matters not appearing on the agenda so long as the subject matter is within the jurisdiction of the CoC Board.

- Jason Phillips read the names of individuals who have passed experiencing homelessness in July 2026, in remembrance and recognition.

**CONSENT CALENDAR**

1. Approve Commission to Address Homelessness and CoC Board Joint Special Meeting Minutes from July 21, 2026.
2. Approve CoC Board Meeting Minutes from July 22, 2026.
3. Approve CoC Board Special Meeting Minutes from July 30, 2026.
4. Approve CoC Board Special Meeting Minutes from August 7, 2026.
5. Receive and file the CoC Strategic Plan monthly updates for July and August 2026.
6. Receive and file list of agencies and jurisdictions approved for Homeless Management Information System (HMIS) access from December 12, 2025, to September 17, 2026.
7. Receive and file the Orange County Sheriff's Department 2024 Homeless Death Review Report.
8. Approve revised CoC Board 2026 Meeting Schedule Calendar amending the December meeting date from December 16, 2026, from 2:00 p.m. to 5:00 p.m. to December 17, 2026, from 9:00 a.m. to 12:00 p.m.

Robert "Santa Bob" Morse motioned to approve the Consent Calendar. Kelita Gardner second the motion. Chair Maricela Rios-Faust issued a voice vote. No nays, no abstention, the motion passed.

### **BUSINESS CALENDAR**

1. **Good News Story: PATH** – Kassandra Munoz, Yale Associate Director, and Joshua Noble, Case Manager, PATH

Joshua Noble and Kassandra Munoz shared information and a good news story regarding PATH's Yale Navigation Center.

2. **CoC Nominating Ad Hoc** – Timothy Kirkconnell, CoC Manager, Office of Care Coordination

Timothy Kirkconnell provided an overview of the 2026 CoC Board member nomination and selection process. As outlined in the Orange County CoC Governance Charter, the Office of Care Coordination as the Collaborative Applicant for the Orange County CoC is recommending establishing a CoC Nominating Ad Hoc to support the review of the CoC Governance Charter and CoC Board election process for the seats expiring December 31, 2026.

#### **Recommended Actions:**

- b. Establish the 2026 CoC Nominating Ad Hoc to support the nomination and election for the CoC Board, including the review of the CoC Board composition, qualifications, nomination and election process as detailed within the CoC Governance Charter.
- c. Approve the Office of Care Coordination to work with the Vice Chair to finalize the 2026 CoC Nominating Ad Hoc membership.

Kelita Gardner motioned to approve Recommended Actions b. and c. Nichole Gideon seconded the motion. Chair Maricela Rios-Faust issued a voice vote. No nays, no abstention, the motion passed.

#### **Board Member Comments:**

- Vice Chair Nishtha Mohendra shared comments on the interest of the 2026 CoC Nominating Ad Hoc and confirmed that the membership will be finalized with the Office of Care Coordination.

3. **Homeless Housing, Assistance and Prevention (HHAP) Program** — Zulima Lundy, Director of Operations

At the October 22, 2025, meeting, the CoC Board authorized the Office of Care Coordination to issue a Request for Proposals (RFP) to program the remaining HHAP Round 5 funding under Operating Subsidies Interim Housing eligible use category. On May 27, 2026, the Office of Care Coordination issued an RFP to seek qualified providers for Emergency Shelter Operations and Services for Individuals, Families, Survivors and Transitional Age Youth (TAY) to be funded with HHAP. A total of nine proposals were received by the solicitation deadline of July 8, 2026. All nine proposals were deemed responsive.

In accordance with the County of Orange's Procurement Policy Manual, the Office of Care Coordination will be taking an Agenda Staff Report and attachments to the Orange County Board of Supervisor's at the September 29, 2026 meeting at 9:30 a.m. to seek approval for the model contract for emergency shelter operations and services for individuals, families, and survivors and transitional aged youth for an initial contract term of January 1, 2027, to June 30, 2028; renewable for three additional one-year terms; to select and approve respondents from solicitation results list from highest to lowest score, until all funding is exhausted.

Zulima Lundy provided an update on HHAP Rounds 3 – 6 obligations and expenditures, as detailed in Attachment D of the agenda packet.

On July 13, 2026, the Governor signed Assembly Bill (AB) 179, which finalized administrative changes to prior rounds of HHAP funding and established the framework for HHAP Round 7, including the application process and accountability measures. As part of HHAP Round 7, new requirements were introduced that are only applicable to 14 large cities and counties in which the cities are located. On August 7, 2026, the California Department of Housing and Community Development (HCD) announced the availability of over \$829 million in HHAP Round 7 made accessible through the amended Round 6 Notice of Funding Availability (NOFA). Preliminary HHAP Round 7 allocations were published to assist regions with the planning for their HHAP Round 7 budget plans.

At the April 22, 2026, meeting, the CoC Board appointed Dr. Shauntina Sorrells, Josh Meyers, and Jason Phillips to a HHAP Ad Hoc to support the programming of HHAP funding allocated to the CoC. The HHAP Ad Hoc reconvened in September 2026 to review the remaining HHAP Rounds 4, 5 and 6 funding allocated to the CoC and met three (3) times to develop additional recommendations for CoC Board approval. The recommendations being presented build upon the CoC Board approved recommendations from the May 2026 meeting.

#### Recommended Actions:

- d. Approve the following recommendations for the programming of HHAP funding allocated to the Orange County CoC, as recommended by the HHAP Ad Hoc.
  - (1) Approve the obligation of \$200,000 in HHAP Round 4 funding under the Systems Support eligible use category to partially fund the Compensation for People with Lived Experience Program contracted with Orange County's United Way dba Orange County United Way (OC United Way) in Fiscal Year (FY) 2026-2027 and utilized previously awarded HHAP Round 5 for FY 2027-2028.
  - (2) Approve the obligation of \$89,707.81 in HHAP Round 4 funding under the Systems Support eligible use category to OC United Way to fund HMIS Lead activities such as licensing costs, staff for HMIS operations including the build out of CoC data dashboards and project performance activities for FY 2026-2027.
  - (6) Approve the obligation of \$89,233.50 in HHAP Round 6 funding under the HMIS eligible use category to OC United Way to fund HMIS Lead activities such as licensing costs, staffing, and project performance activities for FY 2027-2028.

Dr. Shauntina Sorrells motioned to approve Recommended Actions d. (1), (2) and (6). Nishtha Mohendra seconded the motion. Becks Heyhoe-Khalil and Tim Shaw recused themselves due to conflict of interest. Chair Maricela Rios-Faust issued a voice vote. No nays, no abstention, the motion passed.

- (4) Approve the submittal of budget modification request for HHAP Round 5 to the California Interagency Council on Homelessness to move \$1,528,029.39 in Delivery of Permanent Housing and Innovative Housing Solutions and \$459,129.49 in Prevention and Shelter Diversion into the Services Coordination eligible use category to support the renewal of Service Coordination Contracts for FY 2027-2028.
- (5) Approve the obligation of \$1,987,158.88 in HHAP Round 5 funding under the Services Coordination eligible use category to renew the Services Coordination Contracts for FY 2027-2028, as detailed below:
  - a. \$928,993.86 for Services Coordination for Individuals and Families in the North and Central Service Planning Area with The HUB Orange County.
  - b. \$433,594.72 for Services Coordination for Individuals in the South Service Planning Area with Friendship Shelter, Inc.
  - c. \$416,380.47 for Services Coordination for Transitional Aged Youth in the North and Center Service Planning Area with Orangewood Foundation.
  - d. \$208,189.85 for Services Coordination for Transitional Aged Youth in the South Service Planning Area with Friendship Shelter, Inc.

Dr. Shauntina Sorrells motioned to approve Recommended Actions d. (4) and (5). Kelita Gardener seconded the motion. Nishtha Mohendra and Dr. Tiffany Mitchell recused themselves due to conflict of interest. Chair Maricela Rios-Faust issued a voice vote. No nays, no abstention, the motion passed.

- (8) Approve the obligation of \$1,534,979.75 in HHAP Round 6 funding under the Operating Subsidies – Interim Housing eligible use category to fund projects selected through the Emergency Shelter Operations and Services RFP, to award additional recipients and/or extend contracts for an additional one-year term.

Dr. Shauntina Sorrells motioned to approve Recommended Action d. (8). Melanie McQueen seconded the motion. Chair Maricela Rios-Faust issued a voice vote. Dr. Tiffany Mitchell was not in the room and did not vote. No nays, no abstention, the motion passed.

- (3) Continue previously approved CoC Board commitments for HHAP Round 5 funding to support CoC Program-funded projects that may be impacted due to the FY 2026 CoC Program Notice of Funding Opportunity (NOFO) to be fulfilled utilizing HHAP Round 6 funding.
- (7) Approve the obligation of \$1,864,979.75 in HHAP Round 6 funding under the Rapid Rehousing (RRH) eligible use category to fund projects selected through the RRH Services Request for Proposals (RFP) released on September 4, 2026, to allow for an extended contract term of up to 30 months.
- (9) Approve the obligation of \$330,000 in HHAP Round 6 funding under the Operating Subsidies – Interim Housing Youth Set-Aside eligible use category to fund projects selected through the Emergency Shelter Operations and Services RFP, to award additional recipients and/or contracts for an additional one-year term.

Sandra Lozeau motioned to approve Recommended Actions d. (3), (7), and (9). Dr. Shauntina Sorrells seconded the motion. Chair Maricela Rios-Faust issued a voice vote. No nays, no abstention, the motion passed.

Public Comments:

- Hannah Shin-Heydorn, City Manager of Stanton, spoke about the North Service Planning Area (SPA) and its 12 cities with two navigation centers. Hannah Shin-Heydorn highlighted the key metrics of the navigation centers and the support they provide in terms of services, food resources, medical support and more. Hannah Shin-Heydorn asked the CoC Board to consider the impact on the North SPA navigation centers for future HHAP allocations.
- Gabriella Yap, Assistant City Manager of La Habra, shared background on the North SPA Homeless Collaborative and how the cities pooled in funds to build the two navigation centers. Gabriella Yap emphasized how Permanent Local Housing Allocation Program (PLHA) funds have declined 60% from five years ago and operating costs have increased 15-fold leading to cities paying funding gaps from the general funds of their cities. Gabriella Yap asked that the CoC Board consider HHAP funding for the navigation centers for today and for the future.
- Rosanna Ramirez, Acting City Administrator for Placentia, highlighted the investments the City of Placentia has made in street to treatment, outreach linkages, and interim housing solutions. Rosanna Ramirez emphasized that the North SPA cities are facing financial downtown and asked that the HHAP funds be used to fund the North SPA.
- Aaron France, City Manager of Buena Park, stated that the 5 North SPA city managers represent the other city managers that could not attend the meeting in-person. As mentioned by colleagues, Aaron France stated that there is a great cost to fund the navigation center and asked the CoC Board to consider funding the navigation center with past or future allocations of HHAP funding.
- Elizabeth Andrade expressed a sense of gratitude for the recommendation to further fund HMIS which helps support the funding gap of HMIS funding costs.

Board Member Comments:

- Dr. Shauntina Sorrells asked about the match requirements for HHAP Round 7.
- Marisol Johnson provided kudos on the recommendations and shared appreciation for the compensation program for individuals with lived experience. Marisol Johnson asked a question about the pro-housing designation requirements.
- Melanie McQueen asked about the budget modification request for HHAP Round 5 and whether it has an impact of potentially leaving unobligated funds.

**4. CoC Committee Appointment** – Timothy Kirkconnell, CoC Manager, Office of Care Coordination

At the February 25, 2026, CoC Board meeting, Shakoya Green-Long was appointed by the CoC Board to serve as the Chair of the Domestic Violence (DV) Committee. During that time, the Office of Care Coordination worked with past Chair Maricela Rios-Faust and Shakoya Green-Long to review and reestablish membership of the committee to align with purpose and the ability to obtain quorum to conduct business. In June 2026, the Office of Care Coordination was notified that Shakoya Green-Long had resigned from the CoC Board, providing a need for another CoC Board member to be appointed as DV Committee Chair. Maricela Rios-Faust, as the previous Chair, worked with the Office of Care Coordination to identify potential Board members who were well-positioned to step into the vacancy. As such, Nichole Gideon is being recommended for appointment as DV Committee Chair.

Recommended Action a: Appoint Nichole Gideon as Chair of the Domestic Violence Committee, to serve for the duration of her CoC Board member term.

Tim Shaw motioned to approve Recommended Action a. Sandra Lozeau seconded the motion. Chair Maricela Rios-Faust issued a voice vote. No nays, no abstention, the motion passed.

**5. Coordinated Entry System (CES) Evaluation Update** — Dr. Shauntina Sorrells, Strategy Owner, Nishtha Mohendra, Strategy Owner, and Tom Albanese, LSW, Project Lead, Element Consulting Group, LLC

Tom Albanese provided a brief presentation on the Orange County CES Evaluation, which was an independent evaluation conducted by Element Consulting Group with support from the Samueli Foundation.

Board Member Comments:

- Dr. Shauntina Sorrells stated that Samueli Foundation can provide some funding for implementation of recommendations and will be bringing a further plan in the future of the ideas. Dr. Shauntina Sorrells noted that the CES Evaluation is one checkpoint of the CoC Strategic Plan.
- Vice Chair Nishtha Mohendra shared support for the funding to implement recommendations.
- Tim Shaw shared that the CES Evaluation and implementation of recommendations is an exciting opportunity for innovation.
- Robert “Santa Bob” Morse gave a shout out to the Lived Experience Advisory Committee for their work on the CES Evaluation focus groups.

**6. HMIS Data Request for the Orange County United Way and University of California, Irvine (UCI) Cost of Homelessness Study** – Erin DeRycke, Director, Data Analytics, 2-1-1 Orange County (211OC), OC United Way; Rachel Goldberg, Ph.D. MPH Associate Professor of Sociology, UCI; and Becks Heyhoe-Khalil, Executive Director, United to End Homelessness, OC United Way

Becks Heyhoe-Khalil and Dr. Rachel Goldberg, Ph.D. MPH Associate Professor of Sociology with UCI presented an overview of the Cost of Homelessness Study.

In accordance with the HMIS Policies and Procedures, data requests for client-level data and Program Descriptor Data are approved by the Orange County CoC Board prior to any data being released. On July 28, 2026, 211OC received a data request from UCI to receive an export of client-level data, as well as additional monthly exports. In addition, UCI requested Program Descriptor Data Elements for projects active in HMIS as of September 2026 to gain a better understanding of provider participation and support communication with providers during the study.

Recommended Actions:

- b. Approve UCI’s HMIS data request for client-level data as detailed in the associated memo for the period of September 1, 2019, through September 30, 2026, with additional monthly HMIS data exports from October 1, 2026, through April 30, 2028, to support the Cost of Homelessness Study facilitated by UCI in partnership with OC United Way.
- c. Approve UCI’s HMIS data request for Program Descriptor data elements, as detailed in the associated memo, for a one-time export of HMIS data for projects active in HMIS on September 30, 2026, to analyze the cost of homelessness in Orange County.

Upon further discussion, a substitute motion was introduced by Marisol Johnson.

Substitute Motions:

- b. Approve UCI's HMIS data request for client-level data as detailed in the associated memo and presentation, except for Custom Question: Phone Number and Custom Question: Country Born, for the period of September 1, 2019, through September 30, 2026, and with additional monthly HMIS data exports from October 1, 2026, through April 30, 2028, to support the Cost of Homelessness Study facilitated by UCI in partnership with OC United Way.
- c. Approve UCI's HMIS data request for Program Descriptor data elements, as detailed in the associated memo, for a one-time export of HMIS data for projects active in HMIS on September 30, 2026, to analyze the cost of homelessness in Orange County.

Marisol Johnson motioned to approve the Substitute Motions. Kelita Gardener seconded the motion. Becks Heyhoe-Khalil recused herself due to conflict of interest. Chair Maricela Rios-Faust issued a roll call vote. Dr. Shelby Feliciano-Sabala, Kelita Gardner, Nichole Gideon, Marisol Johnson, Sandra Lozeau, Dr. Tiffany Mitchell, Nishtha Mohendra, Jason Phillips, Maricela Rios-Faust, Tim Shaw, and Dr. Shauntina Sorrells voted yes. Melanie McQueen abstained. Robert "Santa Bob" Morse voted no. The motion passed.

Public Comment:

- Alan Achterberg provided public comment via email in advance of the CoC Board meeting and asked the Board not to approve a multi-year, client-level HMIS export for the Cost of Homelessness Study unless the public record first shows exactly what data will be disclosed, who will receive it, what outside databases it may be linked with, and what enforceable safeguards prevent re-identification, secondary use, or onward disclosure. Alan Achterberg provided additional information and asked before approval, to require a public, redacted version of the data-use or research agreement; a complete data dictionary; the precise Privacy Notice and consent authority relied upon; data minimization and exclusion rules; UCI research-governance or IRB documentation; restrictions on linkage and re-identification; access logging and audit rights; retention and destruction terms; and a clear process for suspending future monthly exports. Alan Achterberg also requested that the approval record expressly state whether the released data may be used for AI or machine-learning development, predictive analytics, automated triage, profiling, or referral recommendations. Alan Achterberg shared support for rigorous research into homelessness costs, but people whose data make that research possible deserve transparency, meaningful privacy protection, and enforceable limits. Alan Achterberg asked to please defer approval until those materials and safeguards are available for public review.

Board Member Comments:

- Marisol Johnson asked the following questions: if there was written documentation of what would occur if data approved gets shared with someone else and what are the consequences of that, if there was capacity from 211OC to complete the data request, and why the question of Country of Birthplace was included. Marisol Johnson shared feedback and comments on the data element being requested.
- Dr. Shelby Feliciano-Sabala shared excitement for a new cost study. Dr. Shelby Feliciano-Sabala questioned when the final presentation or final report would be provided. Dr. Shelby Feliciano-Sabala commented that youth and family homelessness look different and emphasized that there is a need to ensure representation and disaggregated data for specialized populations. Dr. Shelby Feliciano-Sabala asked about accessibility of the report to ensure that the report is not only in an academic journal subscription.
- Melanie McQueen asked about the original HMIS consent form and whether contact information is included in that consent to ensure that clients are not getting unsolicited phone calls.
- Dr. Shauntina Sorrells asked if the United To End Homelessness' Lived Experience Council is looking at the study questions.
- Kelita Gardner asked about the 70-page cost study report.

- Vice Chair Nishtha Mohendra liked the suggestion of finding a balance and relying on the organizations of the systems. Vice Chair Nishtha Mohendra about the use of Artificial Intelligence (AI).

**7. Coordinated Entry System (CES) 2 for 1 Match Policy** – Maricela Rios-Faust, Chair, Nishtha Mohendra, Vice Chair, and Dr. Tiffany Mitchell, Secretary, CoC Board, and Timothy Kirkconnell, CoC Manager, Office of Care Coordination

At the June 24, 2026, CoC Board meeting, the Office of Care Coordination provided an update on the evaluation of the 2 for 1 Match Policy (Policy) pilot. The CoC Board clarified the status of the Policy, inquired about the overall use and engagement with the Policy, asked about how the providers and partners were communicated with about the Policy, and expressed support for the CoC Board Officers working with the Office of Care Coordination to prepare next steps related to the Policy implementation. The Office of Care Coordination met with the CoC Board Officers to understand the Officers’ proposed next steps for the Policy. This discussion included consideration for the regular review of the CES Policies and Procedures as well as recommendations that may impact the CES Policies and Procedures as a result of the current CES Evaluation. Based on the discussion, the CoC Board Officers recommend incorporating the 2 for 1 Match Policy as part of the CES Policies and Procedures.

The goal of the 2 for 1 Match Policy Outreach and Communications Plan effort is to raise awareness of the Policy so that interested stakeholders understand both its purpose and the process for submitting a match request. Consistent outreach across the full period equips stakeholders to act on the Policy, and helps ensure that any low uptake reflects an informed decision rather than a lack of awareness.

Recommended Actions:

- Approve the 2 for 1 Match Policy and incorporate the 2 for 1 Match Policy into the CES Policies and Procedures, as recommended by the CoC Board Officers.
- Approve the 2 for 1 Match Policy Communications Strategy as developed by the Office of Care Coordination, CES Lead, as detailed in the associated memo.

Sandra Lozeau motioned to approve Recommended Actions a. and b. Marisol Johnson seconded the motion. Chair Maricela Rios-Faust issued a voice vote. No nays, no abstention, the motion passed.

Board Member Comments:

- Kelita Gardner asked for clarification on how “bi-weekly” is being defined within the communication plan.
- b. **CoC Program Update** — Zulima Lundy, Director of Operations and Timothy Kirkconnell, CoC Manager, Office of Care Coordination

On September 18, 2026, at 2:20 p.m. PT, HUD reopened its FY26 CoC NOFO to accept applications with a new deadline of September 30, 2026, at 5:00 p.m. PT. The Orange County CoC will be utilizing the results of the FY 2026 local competition process to respond to the reissued FY 2026 CoC Program NOFO and will not be soliciting any additional proposals nor updating the project priority listing. The Office of Care Coordination as the Collaborative Applicant will work alongside the CoC Funded Agencies and New Project Applicants to finalize e-snaps applications. The Office of Care Coordination will also work to finalize the Consolidated Application and be ready to submit by the September 30, 2026, deadline.

On September 1, 2026, HUD released the FY 2027 Fair Market Rents (FMR). Public comments are due to HUD by October 1, 2026. Orange County is one of the areas where the FY 2027 FMR decreased when compared to FY 2026. The FY 2027 FMRs for the Orange County metro area decreased from 2026 by between 3-5.5%, depending upon bedroom size. The Office of Care Coordination reached out to CoC Funded Agencies to hear how agencies will be impacted by the changes in FMR and whether agencies will be providing public comment on this change. The Office of Care Coordination is looking to provide an impact report to the CoC Board at a future meeting.

c. **HMIS Lead Updates** – Erin DeRycke, Director, Data Analytics, 211OC, Orange County United Way

Erin DeRycke provided the following HMIS Lead updates: the HMIS Policies and Procedures that will go to the Lived Experience Advisory Committee on October 7, 2026, for approval; published reports of Data Quality Report Cards, Emergency Shelter Project Performance Reports, and Street Outreach Project Performance Reports; active data requests that have new updates; and upcoming HMIS meetings and training opportunities.

Board Member Comments:

- Dr. Shauntina Sorrells asked about the CoC Dashboard timeframe of when it will be completed.
- Becks Heyhoe-Khalil highlighted United to End Homelessness' Hunger and Homelessness Awareness Week which is coming up in November. United to End Homelessness will be partnering with PBS SoCal for various events.

Dr. Shauntina Sorrells motioned to adjourn the meeting. Nishtha Mohendra seconded the motion. Chair Maricela Rios-Faust adjourned the meeting at 4:47 p.m.

**Next Meeting:** Wednesday, October 28, 2026, from 2:00 p.m. – 5:00 p.m.

# Orange County CoC Strategic Plan:

## Monthly Progress Update

**Strategic Plan Progress Reporting Month:** September 2026

**CoC Board Meeting Date:** 10/28/26

**CoC Strategic Plan Background:** Finalized by the CoC Board in September 2025, the Orange County CoC Strategic Plan outlines the Orange County CoC's strategic aims, objectives, goals, and actions from October 1, 2025 – September 30, 2028. Implementation is currently being managed by Aubrey Sitler (ACStrategies). This monthly progress update aims to provide transparency and accountability for the current strategies of focus.

### Upcoming CoC Board and Committee requests:

- **Strategy 2 (Coordinated Investment Planning)** will bring an initial report to the CoC Board for discussion in November.
- **Strategy 3 (Support for People with Lived Experience)** will bring the YAB Charter to the CoC Board for review and approval soon. This strategy will also likely hold some youth collaboration trainings for the CoC Board before YAB members are integrated into the CoC Board space. No date set yet.
- **Strategy 4 (Policy Agenda)** plans to bring a drafted advocacy policy to the CoC Board soon.
- **Strategy 6 (Written Standards)** plans to bring drafted Transitional Housing and Street Outreach Written Standards to LEAC, the YAB, PPS, and the full Board in the next few months.
- **Strategy 7 (CES Eval)** plan to bring a drafted CES Improvement Workplan and Roadmap to the CoC Board for consideration by November.
- **Strategy 8 (Key Partner Eval)** is working to bring the drafted Board evaluation process to LEAC and PPS in August and September before bringing to the Board after that.
- **Strategy 9 (Manage Strat Plan)** plans to bring the Year 2 Strategic Plan priorities and structure to the CoC Board for review and discussion in November, with hopes to approve and adopt by December and implement beginning in January 2027.

| Strategy          | Owner(s)               | Status  | Progress Notes                                            |
|-------------------|------------------------|---------|-----------------------------------------------------------|
| 1: Staff Training | Andrew Crowe, SantaBob | Unknown | No updates were provided on this strategy for this month. |

| Strategy                                           | Owner(s)                             | Status                                                    | Progress Notes                                                                                                                                                                                                                                                                                                        |
|----------------------------------------------------|--------------------------------------|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>2: Coordinated Investment Planning</b>          | OCC                                  | Mostly on track, with some items running slightly behind. | Homebase has completed an initial final report outline and shared it with OCC and shared initial overview of the project's results with the Strategic Plan Working Group in September. They are currently working to integrate additional information as requested through feedback opportunities.                    |
| <b>3: Support for People with Lived Experience</b> | OCC                                  | Mostly on track, with some items running slightly behind. | OCUW and OCC, with some support from ACStrategies, continued to collaborate to support the YAB with weekly structure and governance meetings. The YAB's governance structure and charter are almost complete.                                                                                                         |
| <b>4: Policy Agenda</b>                            | Becks Heyhoe-Khalil & Nichole Gideon | Unknown                                                   | No updates were provided on this strategy for this month.                                                                                                                                                                                                                                                             |
| <b>5: Improve Data Collection &amp; Analysis</b>   | Melanie McQueen                      | Running behind                                            | No progress to report this month.                                                                                                                                                                                                                                                                                     |
| <b>6: Written Standards</b>                        | Shelby Feliciano-Sabala              | On track                                                  | Strategy Owner started drafting PSH and Prevention/Diversion standards.                                                                                                                                                                                                                                               |
| <b>7: CES Evaluation</b>                           | Shauntina Sorrells, Nishtha Mohendra | On track                                                  | The CES evaluation team (ECG) facilitated a CES evaluation session in September with leaders from across Orange County. ECG brought an update to the CoC Board in September and hope to finalize a drafted CES improvement workplan and roadmap by November, which will also come to the CoC Board for consideration. |

| Strategy                                        | Owner(s)      | Status                                                    | Progress Notes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------|---------------|-----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>8: Evaluation of Key Partners</b>            | Tim Shaw      | On track, with some delays due to scheduling              | Strategy Owner integrated stakeholder feedback into the final draft of the Board evaluation framework in preparation for bringing it to PPS in October. Will bring to the CoC Board sometime after. Strategy owner also continued drafting the Collaborative Applicant/Administrative Entity evaluation framework.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>9: Manage &amp; Implement Strategic Plan</b> | Aubrey Sitler | On track, with extension to January for start of "Year 2" | Strategy Owner continued working with each Strategy Owner as requested to support their tasks. Owner is working with Board Officers and OCC to propose possible priorities and updates to the Strat Plan structure, utilizing lessons learned from Year 1 implementation to ensure Year 2 continues to be successful. A working session is currently planned for October to begin discussing possible directions with key partners. Full Strat Plan review, discussion, and consideration for approval and adoption are currently planned for November and December CoC Board meetings, with implementation for Year 2 to hopefully begin in January. Strategy 2 (Fiscal Mapping) and Strategy 7 (CES Eval) findings and recommendations will inform proposed Strat Plan updates and Year 2 priorities. |

**Date:** October 28, 2026

**Subject:** 2026 Continuum of Care (CoC) Nominating Ad Hoc Recommendation

**Recommended Action:**

- a. Approve revisions to the CoC Board responsibilities, composition, nominating and selection process, and qualifications sections detailed in the Orange County CoC Governance Charter, as recommended by the 2026 CoC Nominating Ad Hoc.

**Background and Analysis**

Each year, the Orange County CoC Board establishes a CoC Nominating Ad Hoc (Ad Hoc) to support the annual review of the Orange County CoC Governance Charter (Charter) and facilitate the CoC Board selection process for the CoC Board seats expiring in December. During the September 23, 2026, meeting, the CoC Board approved the recommendation to establish the 2026 Ad Hoc to facilitate the annual Charter review and nominating and selection process. The Office of Care Coordination supported the CoC Board to recruit for the Ad Hoc membership, receiving interest via a submitted SurveyMonkey interest form. The final membership of the 2026 Ad Hoc was confirmed by the CoC Board Vice Chair. The Ad Hoc membership was informed by the Charter and includes two (2) current CoC Board Members that are not up for re-election as well as additional CoC General Members representing different entities of the homeless service system. The 2026 Ad Hoc membership includes Carolyn Coleman, Community Action Partnership of Orange County (CAP OC); Robert Daley, Individual; Elizabeth Flores, Lived Experience Advisory Committee (LEAC); Sandra Lozeau, City of Anaheim and CoC Board Member; Barry Ross, Sisters of St. Joseph Healthcare Foundation; Dr. Shelby Feliciano-Sabala, Project Hope Alliance and CoC Board Member; and Tianna Terry, City of Costa Mesa.

The 2026 Ad Hoc convened three (3) times in the month of October to review Sections V.B.1 – V.B.4 of the Charter, with the support of the Office of Care Coordination, and provided feedback on changes that should be proposed this year, versus changes that should be considered the next time the Charter is reviewed. The Office of Care Coordination provided recommended revisions for 2026 Ad Hoc consideration based on previous CoC Board and Policies, Procedures and Standards (PPS) Committee discussions, such as the suggestion to increase Youth Action Board (YAB) representation to at least two (2) members. Additionally, the Office of Care Coordination provided an overview of Charter revisions approved by the CoC Board during the July 22, 2026, meeting, tied to the scoring criteria outlined Fiscal Year (FY) 2026 CoC Program Notice of Funding Opportunity (NOFO). Revisions included updates to Section V.B.2.b, the CoC Board Composition, and expanded the CoC Board from 17-21 seats to 19-25 seats, callouts for “at least” one representative from both the Lived Experience Advisory Committee (LEAC) and the YAB, and added or modified representation areas including the behavioral health field, health care field, business community, law enforcement, recovery housing, workforce development and the local court system. Following in-depth review and discussion, the 2026 Ad Hoc is recommending the proposed revisions to the Charter as detailed in Attachment A.

The proposed changes as recommended by the 2026 Ad Hoc are also summarized below.

#### *Section V.B.1. CoC Board Responsibilities*

- Clarified that committee participation could also include a subcommittee or ad hoc

#### *Section V.B.2. CoC Board Composition*

- Increased LEAC-appointed seats to at least two (2)
- Increased YAB-appointed seats to at least two (2)
- Added lived experience of homelessness as a person with a disability to recommended lived experience representation
- Removed personal experience as a qualifier for listed areas of representation
- Clarified Emergency Solutions Grant (ESG) Program representation to be a representative from an entitlement jurisdiction
- Updated CoC Board Support section to better describe the functions of each lead agency.

#### *Section V.B.3. CoC Board Selection Process*

- Added language for process if selected candidates are not ratified by the CoC Board.
- Updated LEAC and YAB appointment process to be consistent with Section V.B.2.
- Removed outdated language for CoC Board terms

#### *Section V.B.4. CoC Board Qualifications*

- Made minor formatting updates

The CoC Board is being asked to review and approve the revisions to the Charter, as recommended by the 2026 Ad Hoc. If approved the recommended changes will be implemented for this year's CoC nominating and selection process, with continued guiding principles and benchmarks for building a more representative CoC Board membership by January 2027.

#### **Attachments**

Attachment A – Orange County CoC Governance Charter (Redline Version)

Attachment B – Orange County CoC Governance Charter (Clean Version)

## Orange County CoC - CA - 602 Governance Charter

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## Item 2. Attachment A.

**Introduction:** In accordance with the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (the “HEARTH Act”) which was enacted into law on May 20, 2009, the Orange County Continuum of Care in consultation with the Collaborative Applicant (County of Orange), Continuum of Care and Emergency Solution Grant funded agencies and Homeless Management Information System (“HMIS”) Lead Agency has developed a governance charter which includes procedures and policies needed to comply with the HEARTH Act requirements as prescribed by U.S. Department of Housing and Urban Development (HUD); and a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board.

In addition to HEARTH Act compliance and in alignment with the Regional System of Care, the Continuum of Care (“CoC”) will operate to enhance, inform and implement services addressing the complex case management and housing needs of individuals and families experiencing homelessness in Orange County. Services supported by the Orange County CoC will also demonstrate best practices and evidence-based practices ensuring a client-centered approach, client choice and client rights and responsibilities are clear and service standards are consistently met.

The Orange County CoC designates the County of Orange as the collaborative applicant and fiscal entity for administering planning and funding for homelessness assistance program throughout the Orange County CoC.

### **I. Name:**

The technical name of the organization is CoC CA-602 hereinafter referred to as the “Orange County CoC”.

### **II. Geographic Boundaries:**

The Orange County CoC covers all the geography within the boundaries of Orange County, including its 34 cities and unincorporated areas as regionalized within North, Central and South Service Planning Areas.

### **III. Purpose:**

The Orange County CoC serves as the locally-designated primary decision-making group whose purpose and scope is to implement the Continuum of Care program (the “CoC”) which is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11381-11389). As noted in CFR 24 Part 578.1 Purpose and scope of the HEARTH Act, the program is designed to:

- A. Promote communitywide commitment to the goal of ending homelessness through regional coordination and collaboration;
- B. Advocate for funding and resources to end homelessness and provide funding for proven efforts by nonprofit providers and local governments to quickly rehouse people experiencing homelessness, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;
- C. Promote access to and effective utilization of mainstream programs by homeless individuals and families; and

## Item 2. Attachment A.

- D. Promote implementation of best practices and evidence-based approaches to homeless programming and services.

### **IV. Responsibilities of the Orange County CoC**

The four major responsibilities of the Orange County CoC consists of:

1. Operating the Continuum of Care,
2. Designating and operating an HMIS for the Continuum of Care,
3. Planning for the Continuum of Care, and
4. Preparing an application for funds which is in accordance with § 578.7 Responsibilities of the Continuum of Care and in the HEARTH Act and § 578.79.

#### **A. Operating the Continuum of Care.**

The Orange County CoC will:

1. Hold meetings of the full membership, with published agendas, at least semi-annually;
2. Make a public invitation for new members to join available within the geographic area at least annually;
3. Adopt and follow a written process to select a board to act on behalf of the CoC. The process must be reviewed, updated, and approved by the CoC at least every five (5) years;
4. Establish committees, subcommittees and ad hoc groups to address specific functions of the Orange County CoC, as needed;
5. Work with the Collaborative Applicant to develop and update annually a governance charter, which will include all procedures and policies needed to comply with HUD mandates, HEARTH Act regulations and 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 subrecipients to establish performance targets appropriate for population and program type, monitor Continuum of Care and Emergency Solutions Grant funded agencies performance, evaluate outcomes, and take action to address poor performers;
7. Evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program, and report performance measures to HUD as required;
8. In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and operate a Coordinated Entry System that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. The CoC must maintain specific policy to guide the operation of the Coordinated Entry System on how its system addresses the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from nonvictim service providers in compliance with any requirements established by HUD Notice; and

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9. In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:
  - a. Policies and procedures for evaluating individuals' and families' eligibility for assistance;
  - b. Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
  - c. Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;
  - d. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;
  - e. Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and
  - f. Where the CoC is designated a high-performing community, as described in Subpart G, policies and procedures set forth in 24 CFR 576.400(e)(vi), (e)(vii), (e)(viii), and (e)(ix).

### B. Designating and operating a Homeless Management Information System.

The Orange County CoC will:

1. Designate a single Homeless Management Information System (HMIS) for the geographic area;
2. Designate an eligible applicant to manage the CoC's HMIS, which will be known as the HMIS Lead;
3. Review, revise and approve a privacy plan, security plan, and data quality plan for the CoC HMIS;
4. Ensure consistent participation of recipients and subrecipients in the HMIS;
5. Ensure the HMIS is administered in compliance with requirements prescribed by HUD;
6. Ensure the HMIS operates efficiently and effectively to promote HUD funded and non-funded agency participation, system coordination, and utilization and performance is achieved; and
7. Ensure that HMIS captures the Coordinated Entry System Core Elements of Access, Assessment, Prioritization and Referral through program participation by recipients and subrecipients.

### C. Continuum of Care Policies, Procedures and Standards

The Orange County CoC will:

1. Have a Policies, Procedures and Standards Committee that meets at least two times a year or as needed for the review of policies, procedures and standards of the Orange County Continuum of Care;

## Item 2. Attachment A.

2. Have its various committees, subcommittees, and ad hocs proposed drafts, revisions and/or updates to policies, procedures and/ or standards be submitted to the Policies, Procedures and Standards Committee;
3. Have all proposed policies, procedures and standards reviewed and vetted by the Policies and Standards Committee to ensure adherence to the HEARTH Act, HUD Notices and regulations, best practices and evidenced-based approaches, prior to being presented to the CoC Board for adoption; and
4. Engage the public, including homeless and formerly homeless individuals, in policy and standards development and/or revisions that affect the operations of the CoC and ESG funded programs.

### D. Continuum of Care Planning.

The Orange County CoC and the Collaborative Applicant (County of Orange) will develop a plan that includes:

1. Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals, including unaccompanied youth, and families. At a minimum, this system encompasses the following:
  - a. Outreach, engagement, and assessment;
  - b. Shelter, housing, and supportive services;
  - c. Prevention and diversion strategies.
2. Planning for and conducting an annual shelter homeless count and a biennial unsheltered homeless count by Service Planning Area that meets the following requirements:
  - a. Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons;
  - b. Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons; and
  - c. Other requirements established by HUD Notice or to meet local objectives.
3. The HMIS Lead Agency will assist the Collaborative Applicant in conducting an annual gaps analysis of the homeless needs and services available within the geographic area and/or Service Planning Areas;
4. Providing information required to complete the Consolidated Plan(s) within the CoC's geographic area;
5. Consulting with State and local government Emergency Solutions Grants program recipients within the CoC's geographic area on the plan for allocating Emergency Solutions Grants program funds and reporting on and evaluating the performance of

## Item 2. Attachment A.

Emergency Solutions Grants program recipients and subrecipients. Emergency Solutions Grant entitlements include:

- County of Orange
- Santa Ana
- Anaheim
- Garden Grove

### E. Annual Competitive Application for Continuum of Care Funding

The Orange County CoC will:

1. Design, operate, and follow a collaborative process for the development of applications and approve the submission of applications in response to a Notice of Funding Availability (NOFA) published by HUD;
2. Establish priorities for funding proposals to meet needs within in the geographic area;
3. Support the Collaborative Applicant in compiling the required application information from all projects within the geographic area that the CoC has selected for funding; and
4. Retains all of its responsibilities, even if it designates one or more eligible applicants other than itself to apply for funds on behalf of the CoC. This includes approving the CoC application.

### V. Orange County CoC Structure:

The operations and management of the Orange County CoC and its responsibilities are structured in four segments.

#### A. CoC Collaborative Applicant and Fiscal Agent

The Orange County CoC designates the County of Orange as Collaborative Applicant and Planning Grant recipient for homelessness assistance programs throughout the Orange County CoC. The County of Orange will comply with the provisions of 24 CFR 578.7, including coordinating with the development of the CoC system, CoC planning, Coordinated Entry System, HMIS and the support of the various functions and activities as required by the HEARTH Act.

In addition, the Orange County CoC Board designates the County of Orange as administrative and fiscal entity for homeless funding to support the development of the System of Care. The County of Orange is the administrative and fiscal entity for state and local funding from homeless programming that designates the CoC as the eligible applicant and requires the local government entity to be the fiscal agent.

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### B. Orange County CoC Board

As noted in §578.5(b) of the HEARTH Act, “The Continuum of Care must establish a board to act on behalf of the Continuum using the process established as a requirement by § 578.7(a)(3) and must comply with the conflict-of-interest requirements at § 578.95(b).”

The Continuum of Care Board is therefore acting on behalf of the members of the Orange County CoC. To this end, the Orange County CoC will strategically comprise a governing board that represents the stakeholder groups enumerated in the HEARTH Act which require the CoC Board to be representative of relevant organizations and of projects serving homeless subpopulations within Orange County, including at least one (1) homeless or formerly homeless individual.

#### 1. Continuum of Care Board Responsibilities

The Continuum of Care Board will:

- a. Conduct the hands-on work and facilitate the committees, subcommittees and ad hoc groups of the Orange County CoC. Every member of the CoC Board must serve on a minimum of one committee, subcommittee, or ad hoc each year;
- b. Build community awareness of the needs of all homeless and at-risk populations identified in the countyCoC;
- c. Ensure, to the greatest extent possible, access to services by the subpopulations enumerated in this charter;
- d. Ensure relevant organizations and projects serving various homeless and at-risk subpopulations are represented in the planning and decision- making for the overall coordination of homeless services in the Continuum of CareCoC;
- e. Ensure regional coordination and collaborative work across the CoC through the use of the Coordinated Entry System;
- f. Coordinate the CoC Programs and set goals and priorities for ending homelessness in Orange County;
- g. Approve Orange County CoC policies as recommended by cCommittees;
- h. Create committees, subcommittees and ad hoc groups necessary for the proper and efficient functioning of the Orange County CoC, including the CoC program Notice of Funding Opportunity (NOFO); and
- i. Dissolve committees, subcommittees and ad hoc groups, if they are determined to be unnecessary for the proper and efficient functioning of the Orange County CoC.

#### 2. Continuum of Care Board Composition

The CoC Board is comprised of 19 to 25 members in total, who are elected by the voting General Membership, with an odd number of members selected during each election. A quorum consists of fifty percent (50%) plus one (+1) voting members present. The CoC Board shall be comprised of members that provide a well-balanced perspective with multiple experiences and backgrounds to best lead the response to homelessness in the Orange County CoC.

- a. The CoC Board designations are: The CoC Board includes three (3) Officers, who shall be elected by the CoC Board each year. These positions include:

## Item 2. Attachment A.

- i. Chair: Responsible for leading the monthly CoC Board meetings and facilitating the work of the Orange County CoC, as determined in this Charter.
  - ii. Vice-Chair: Responsible for chairing CoC Board meetings in the absence of Chair or when Chair must recuse themselves
  - iii. Secretary: Responsible for tracking attendance and motions for CoC Board meetings, reviewing the draft CoC Board meeting minutes, and chairing CoC Board meetings in the absence of both the Chair and Vice Chair, or when Chair and Vice Chair must recuse themselves
- b. The CoC Board shall have 19 to 25 total CoC Board member seats, with an odd number of members appointed during each election. The makeup of the CoC Board shall include at least the following number of people with each of these experiences and backgrounds. One person may represent more than one of these experiences and backgrounds. By January 2027, the CoC Board will include at least one representative from the Youth Action Board (YAB).
- i. People who have experienced homelessness or housing instability. At least 30% of the CoC Board must be comprised of people with lived experience, though the CoC Board can prioritize including more in any given year. This includes:
    1. At minimum, ~~two one~~ (21) seats will be determined by the Lived Experience Advisory Committee (LEAC). This could be the LEAC chair or someone else.
    2. At minimum, ~~two one~~ (21) seats will be determined by the YAB. This could be the YAB chair or someone else.
    3. It is important to the CoC Board that the Board members with lived experience of homelessness represent an array of household and age makeups. However, because some people with lived experience may not want to disclose that experience publicly, there are no required seats for people from specific household types or age groups. Ideally, the Board is recommended but not required to include at least one person from each of the following groups:
      - a. Lived experience of homelessness as a Transitional Age Youth (TAY) in the last five (5) years
      - b. Lived experience of homelessness as a single adult
      - c. Lived experience of homelessness with their family
      - d. Lived experience of homelessness as an older adult
      - ~~d-e.~~ Lived experience of homelessness as a person with a disability
  - ii. People whose experiences reflect those of the people experiencing homelessness within the CoC. Each nomination and election cycle, the CoC Nominating Ad Hoc will utilize the most recently available data, including but not limited to HMIS, Point-in-Time (PIT) Count, and American Community Survey (ACS) data, to determine how to prioritize desired representation and expertise to ensure that the CoC Board membership background and experience recommendations align with current trends in who experiences

## Item 2. Attachment A.

homelessness in Orange County.

- iii. People who are currently representing, in a professional capacity, the following ~~and/or people with current or past personal experience with any of the below listed areas of representation:~~
  1. Veteran/military service-focused agency (at least 1)
  2. Emergency Solutions Grant (ESG) Program entitlement jurisdiction ~~funded agency or recipient agency~~ (at least 1)
  3. Public Housing Agency (PHA) (at least 1)
  4. Domestic violence agency (at least 1)
  5. Education field / McKinney-Vento liaison (at least 1)
  6. Behavioral health field, which may include a Certified Community Behavioral Health Clinic (CCBHC) (at least 1)
  7. Health care field, which may include a Federally Qualified Health Center (FQHC), Healthcare for the Homeless, or other accessible primary care provider (at least 1)
  8. TAY Agency (at least 1)
  9. Family Agency (at least 1)
  10. Business community, such as a member of the Business Improvement District
  11. Law enforcement
  12. Recovery Housing or Sober Living provider
  13. Local workforce development organization, such as a member of the local Workforce Development Board, State Workforce Agencies, or American Job Centers
  14. Local court system managing Assisted Outpatient Treatment (AOT) and/or other civil commitment processes, or from specialty courts (e.g. Mental Health Court, Drug Court, Care Court)
  15. People with experience with the following parts of the systemCoC. Ideally, the CoC Board will include members who represent all parts of the system, but at minimum the CoC Board must include members who represent at least three (3) of the following:
    - a. Diversion
    - b. Street Outreach
    - c. Prevention
    - d. Emergency Shelter
    - e. Rapid Rehousing
    - f. Permanent Supportive Housing
    - g. Faith-based organization or community
    - h. Affordable housing development background
- c. Continuum of Care Board Support
  - i. Collaborative Applicant – Shall serve as the designated entity responsible for coordinating and supporting the Continuum of Care (CoC) overall governance, planning, funding, and compliance activities for state and federal funding sources. This may be led by tThe CoC Manager and/or other County of Orange staff, in coordination with ~~will facilitate~~ the CoC Board business Officers. and will utilize resources to continue the development of

- ~~the CoC system.~~
- ii. HMIS Lead Agency – Shall be responsible for the administration, oversight, and ongoing management of the CoC's Homeless Management Information System (HMIS), including data quality, security, reporting, system compliance, and technical support, consistent with applicable federal, state, and local requirements. The HMIS Lead Agency will assist the Collaborative Applicant in providing CoC utilization, performance and gaps data and regional Service Planning Area resource information to provide data to the CoC Board to assist in evaluating utilization, performance and system gaps.
  - iii. Coordinated Entry System Lead Agency – Shall be responsible for the administration and oversight of the CoC's Coordinated Entry System (CES), ensuring that access, assessment, prioritization, and referral processes are implemented consistently, equitably, and in accordance with applicable policies and procedures, as approved by The Coordinated Entry System Lead Agency will assist the Collaborative Applicant in providing performance and gaps data information from the Coordinated Entry System to the CoC Board.

### 3. Continuum of Care Board Selection Process

In advance of each term expiration, the following steps are to be completed to select new CoC Board Members:

- a. A Nominating Ad Hoc of at least six (6) people will be appointed annually by the CoC Board Chair.
  - i. At least one (1) member of the Nominating Ad Hoc will be a CoC Board member whose seat is not up for election.
  - ii. At least one (1) member of the Nominating Ad Hoc will be a Voting General Member or represent an organization that has a Voting General Member.
  - iii. At least four (4) members of the Nominating Ad Hoc will not be current CoC Board members.
- b. The Nominating Ad Hoc will review the CoC Governance Charter (Charter) and make any proposed revisions needed to ensure the CoC Board composition, selection process, and qualifications align with the community's priorities and the backgrounds and experiences of key partners, including people with lived experience, in the community. The Nominating Ad Hoc will review the most recently available data to provide due diligence to ensure that the CoC Board membership background and experience recommendations align with current trends in who experiences homelessness in Orange County. The recommended Charter changes will go to the CoC Board for approval. Should the CoC Board provide feedback or recommendations to the proposed changes, the Nominating Ad Hoc will review feedback and incorporate the CoC Board recommendations into the Charter to inform the nomination and election process. In the event that the Nominating Ad Hoc is not in agreement with the CoC Board feedback and recommendations to the Charter, the Nominating Ad Hoc will submit a new version of the Charter for the CoC Board to review and approve before the rest of the CoC Board nomination and election process moves forward.

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- c. The Nominating Ad Hoc will support the Collaborative Applicant in outreach to potential CoC Board candidates to make them aware of the upcoming CoC Board election. These outreach efforts will help ensure adequate representation of backgrounds and experiences listed in the CoC Board composition.
- d. The Voting General Membership will be notified of the nomination period, start and end, as well as the process to nominate a candidate or express interest in being a candidate.
- e. The Nominating Ad Hoc will support the Collaborative Applicant in reviewing submitted applications and verifying qualifications and background and experience of all candidates who apply to serve as CoC Board Members or Officers. The Nominating Ad Hoc will determine a process to verify all candidates meet minimum qualifications before referring such candidates to the CoC General Membership.
- f. The CoC General Membership will vote by secret ballot on the slate of qualified candidates. The Nominating Ad Hoc will utilize a prioritization tool that identifies candidates with the highest votes and ensures desired representation of various experiences and backgrounds for the CoC Board membership. The selected candidates will be presented to the CoC Board for ratification. If the selected candidates are not ratified by the CoC Board, the Nominating Ad Hoc may review the results of the voting and selection process and return to the CoC Board at the following meeting.
- g. The Lived Experience Advisory Committee (LEAC) will select ~~one person a~~ minimum of two people to represent them on the CoC Board. The CoC General Membership will not vote on ~~this person's~~ the representatives' participation on the CoC Board.
- g.h. The Youth Action Board (YAB) will select a minimum of two people to represent them on the CoC Board. The CoC General Membership will not vote on ~~this person's~~ the representatives' participation on the CoC Board.
- h.i. Should a member leave before the expiration of their term, the Collaborative Applicant will confirm whether the vacancy needs to be filled to meet the designated CoC Board composition. The Collaborative Applicant will utilize the applications and prioritization tool from the most recent election to identify a candidate with the highest votes and fulfills desired representation. If the\*designated CoC Board composition cannot be fulfilled, the Collaborative Applicant will follow the same process as outlined above in items a. through f. Appointments made to fill a vacancy left by a member before the expiration of their term shall be for the remaining term of the member.
- h.j. The traditional nominating and election timeline is as follows:
  - i. August/September – CoC Board Chair appoints Nominating Ad Hoc
  - ii. September/October – Nominating Ad Hoc convenes to review and update sections of the Charter that pertain to the CoC Board composition, selection process, and qualifications
  - iii. October/November – Nominating Ad Hoc outreaches to potential CoC Board candidates. The Nominating Ad Hoc will determine a process to verify that CoC Board candidates meet minimum qualifications for the Board.
  - iv. November/December – Candidates who moved forward ~~based on their~~

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- ~~interview~~ are presented to the CoC General Membership for voting/election.
- v. December – CoC Board ratifies slate of elected candidates by the CoC General membership.
- vi. January – CoC Board seating takes place. Outgoing CoC Board and ~~Board staff~~ CoC Board Support will provide training and orientation for incoming CoC Board.

### ~~j-k.~~ CoC Board Member Terms

~~i. The following CoC Board Member Term policy will go into effect with the ratification of new CoC Board members at the December 2025 meeting of the CoC Board, to establish terms and term limits.~~

- i. CoC Board members will serve a three (3) year term;
- ~~ii.~~ CoC Board members will be given the option to renew their term after the completion of one (1) term, membership on the CoC Board will be confirmed through the election process by the CoC General membership;
- ~~iii.~~ CoC Board members will serve no more than two (2) consecutive full terms;
- ~~iv.~~ CoC Board members who have served two (2) consecutive full terms must wait one (1) year before being eligible to serve again on the CoC Board

~~k-l.~~ At the first meeting of the calendar year, the CoC Board will elect the Board Officers (Chair, Vice-Chair and Secretary) to serve for one-year terms. CoC Board Officers may serve for more than one (1) term.

### 4. Continuum of Care Board Qualifications

All CoC Board members must bring a commitment to the work to end homelessness using best practices adopted locally. CoC Board members with lived experience of homelessness who are not also representing a local organization will be compensated for their time and expertise using the CoC's current compensation methods and rates.\* The Orange CoC Board Members and Officers are selected to represent various personal and professional backgrounds, experiences, and entities. As a whole, the Board should:

- i. Be representative of the people who experience homelessness in Orange County;
- ii. Have complementary skill sets;
- iii. Represent a balance of community partners in the region; and
- iv. ~~Be w~~Willingness to collaborate with other potential CoC Board Members and bring in new leaders.

b. Potential and current CoC Board Members must be current voting General Members who demonstrate:

- i. A high level of ethical behavior, including compliance with the Conflict of Interest and Recusal process as defined in this Charter;
- ~~ii.~~ Working knowledge of, compassion about, and commitment to ending homelessness and
- ~~iii.~~ furthering effectiveness and collaboration within the CoC Board and across the CoC's work.
- ~~iv.~~ Leadership and collaborative spirit in the best interest of the Orange County

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CoC.

~~vii.~~ iv. Willingness and ability to consistently attend meetings and participate in Committees, with accommodation as needed.

- c. All CoC Board members must attend at least 75% of meetings each year and not be absent for three (3) consecutive meetings in order to remain in good standing. All CoC Board members must also participate in at least one (1) committee, working group, or ad-hoc each year, and attend at least 75% of ~~committee-the~~ meetings. CoC Board Members ~~and Officers~~ failing to meet the attendance standard will be subject to removal by majority vote fifty percent plus one (50% + 1) of the CoC Board.
  - i. When there is a strategic plan, CoC Board members serving as a Chair of a committee will be de-facto owners of their committees' assigned strategies to own. Should a CoC Committee Chair be unable to participate as an owner, a representative from their CoC Committee may be appointed.

### 5. Continuum of Care Board Meetings

1. All meetings will be open to the public except as otherwise determined by the CoC Board. Any person who attends an Orange County CoC meeting may be asked by the CoC Board Chair to leave if the person is disruptive; if a conflict of interest applies; or if an agenda business item(s) is deemed by the CoC Board Chair to be of such nature that it involves only Orange County CoC closed session business.
2. Robert's Rules of Order Abridged-Revised will guide the process during all meetings.
3. An annual calendar of the CoC Board meetings will be recommended to the CoC Board for adoption at the CoC Board meeting in October and presented at the Service Provider Forum meeting in November. The CoC Board meetings calendar will be distributed to all members electronically and published on the County of Orange – Homeless Services website.

### 6. Continuum of Care Board Documentation

1. The Orange County CoC Board will conduct and transact business in a fair and transparent manner. To this end, the CoC Board will maintain records of all Orange County Continuum of Care agendas and minutes and make these available upon request.
2. The Collaborative Applicant will keep record of all HEARTH Act policies, calendars, meeting minutes, and records.

### 7. CoC Board Conflict of Interest and Code of Conduct

1. Conflict of Interest – Members serving on the CoC Board or any of its

## Item 2. Attachment A.

committees, ad hocs and/or working groups, shall abstain from voting on any issue in which they may be personally vested to avoid a conflict of interest in accordance with County, State and Federal laws, regulations and ordinances and shall refrain from engaging in any behavior that conflicts with the best interest of the CoC. Members must comply with the conflict of interest and recusal process found in the § 578.95 Conflicts of interest of the HEARTH Act<sup>1</sup> and any additional requirements as outline in the Charter and the Orange County CoC Conflict of Interest Policy and Procedure (Attachment A).

a. Members shall not vote nor attempt to influence any other Member on a matter under consideration by the CoC Board or any of its committees, ad hocs or working groups as follows:

- i. Regarding the provision of services by such member (or by an entity that such member represents); or
- ii. By providing direct financial benefit to such member or the immediate family of such member; or
- iii. Engaging in any other activity determined by County, State or Federal law, regulations and ordinances to constitute a conflict of interest.

b. Determining Whether a Conflict of Interest Exists – If a question arises as to whether a conflict exists that may prevent a Member from voting, the CoC Board Chair or designee may consult with designated Collaborative Applicant staff to assist in making that determination.

c. Neither the CoC Board nor any of its Members shall promote, directly or indirectly, any political party, political candidate or political activity using the name, emblem or any other identifier of the CoC Board.

d. No assets or assistance provided by the Collaborative Applicant to the CoC Board shall be used for sectarian worship, instruction, or proselytization, except as otherwise permitted by law.

2. Code of Conduct – Members serving on the CoC Board or any of its committees, ad hocs or working groups, are entrusted with specific responsibilities related to use of public funds invested in addressing homelessness. Members are expected to observe the highest standards of ethical conduct in the execution of these responsibilities. In the performance of their duties, Members are expected to carry out the mandate of the Orange County CoC to the best of their ability and to maintain the highest standards of integrity while interacting with other Members, Orange County CoC representatives, service recipients, service providers, and the public, as outlined in the Orange County CoC Code of Conduct (Attachment B).

a. The Orange County CoC prohibits the solicitation and acceptance of gifts

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<sup>1</sup> 1 CFR 24 578.95 § 578.95 Conflicts of Interest: <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>

or gratuities by the CoC Board, committees, ad hocs or working groups, Voting Members, or employees and agents of the Collaborative Applicant from anyone who intends to receive personal benefit or preferential treatment. Violation of any portion of this Code of Conduct could subject a CoC Voting Member to immediate termination from membership as determined by the CoC Board;

- b. The Orange County CoC promotes impartiality in performing official duties and prohibits any activity representing a conflict of interest. Individuals should not act on a matter if a reasonable person who knew the circumstances of the situation could legitimately question fairness;
- c. Members shall:
  - i. Put forth honest effort in the performance of their duties;
  - ii. Not knowingly make unauthorized commitments or promises of any kind purporting to bind the Orange County CoC without previous CoC Board approval;
  - iii. Disclose waste, fraud, abuse and corruption to the appropriate authorities;
  - iv. Adhere to all laws and regulations that provide equal opportunity to all United States citizens regardless of race, color, religion, sex, gender, sexual orientation, national origin, age, or disability, or any other protected category;
  - v. Conduct themselves with courtesy and respect. Personal relationships should not result in special considerations that influence the performance of their official duties in a manner contrary to the interest of the broader Orange County CoC. Members are expected to exercise adequate control and supervision over matters for which they are individually responsible.
  - vi. Assure that the resources entrusted to them are used for conducting official business only. Members of the CoC Board must abide by the Conflict of Interest Policies established for CoC Board operations (See Section V.B.7.1.).
  - vii. Protect any confidential information provided to, or generated by, the activities of the Orange County CoC; and
  - viii. Not use confidential information of the Orange County CoC for any purpose or disclose such confidential information to any third party, except as necessary to perform their duties and responsibilities as members of the CoC Board.

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3. Termination Policy - Any Member, or the entire CoC Board, may be removed for cause by a two-thirds (2/3) vote of the Orange County CoC Voting Membership at a specially called meeting. Cause is constituted by a violation of the Conflict of Interest regulations or a violation of the Code of Conduct.

### C. CoC General Membership

CoC General Membership is based upon organizations within the Geographic Area participating in the responsibilities of the Orange County CoC by having organizational representatives actively participate in CoC Board, committees, ad hocs and working groups.

As noted in § 578.5 Establishing the CoC. Relevant organizations will include:

“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 organizations that serve veterans and homeless and formerly homeless individuals.”

Additionally, the Orange County CoC will strive to ensure representation from an array of public agencies including those dedicated to behavior health; substance use recovery services; health; employment training and development; youth; and housing and community development.

#### a. Nominations for Orange County CoC General Membership

A public invitation within the Geographic Areas of the CoC will be extended annually for new members to join in accordance with the HEARTH Act as described in § 578.7 Responsibilities of the CoC.

#### b. General Membership Terms

There is no term limit. Membership, however, may be terminated by the Orange County CoC in accordance with subsection I. Removal below.

#### c. Continuum of Care Meetings

The Orange County CoC will hold meetings of the full membership with published agendas at least twice a year. The Orange County Service Provider Forum serves to facilitate CoC full membership meetings.

#### d. Quorum

A number equal to a majority of those belonging to the Orange County CoC will constitute a quorum for the transaction of business at any general membership meeting.

#### e. Voting

At all meetings, business items may be decided by arriving at a consensus. If a vote is necessary, all votes will be by voice or ballot at the will of the majority in attendance. The exception to this rule is a vote to elect Members, in this case a

## Item 2. Attachment A.

vote will be held by secret ballot. Each active organization will have one vote given by one representative even when more than one organizational representative is present. No active organization may vote on any item which presents a real or perceived conflict-of-interest.

f. Conflict of Interest

CoC General Members must comply with the conflict of interest and recusal process found in the § 578.95 Conflicts of interest of HEARTH Act<sup>2</sup> and any additional requirements as outline in the Charter and the Orange County CoC Conflict of Interest Policy and Procedure (Attachment A).

g. Code of Conduct

Members will ensure a commitment to the Orange County CoC Code of Conduct (Attachment B).

h. Removal

Any CoC General Member of the Orange County CoC may be removed by a two-thirds majority of all organizations present during a scheduled meeting.

D. Collaboration with Commission to End Homelessness

The Commission to End Homelessness focuses on regional policy and implementation strategies, affordable housing development, data and gaps analysis, best practice research, social policy and systems change to promote an effective response to homelessness within the County of Orange. The CoC Board will regularly provide information and recommendations around CoC funded homeless programs to the Commission to End Homelessness. This will ensure regional alignment of efforts to resolve homelessness.

1. The CoC Board will collaborate with the Commission to End Homelessness to:
  - a. Address gaps within the System of Care;
  - b. Strengthen operational performance;
  - c. Ensure regional access and alignment;
  - d. Receive expertise related to each System of Care component in support of the CoC System integration objectives; and
  - e. Identify, secure and prioritize funding opportunities that provide system enhancements within the five components of the System of Care” Community Corrections, Behavioral Health, Healthcare, housing, Benefits and Support Services.
2. The CoC Board will at least annually report to the Commission to End

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<sup>2</sup> CFR 24 578.95 § 578.95 Conflicts of Interest: <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>

## Item 2. Attachment A.

Homelessness on the progress of the Orange County CoC. These reports may include:

- a. HUD System Performance Measures (SPM) Report
  - b. Housing Inventory Chart (HIC)
  - c. Gaps Analysis Reports
  - d. Point-in Time (PIT) Count (unsheltered biennially and sheltered annually)
  - e. Funding priorities, grants and funding awards from federal and state government
  - f. Any other reports requested by the Commission to End Homelessness to help further system of care policy recommendations and regional system development.
3. The chairperson of the CoC Board and the Commission to End Homelessness may establish ad hoc committees to provide recommendations regarding time-limited tasks that support the goals of the Commission to End Homelessness and assist in the functions of the CoC Board.
  4. Non-conflicted Commission to End Homelessness members may participate on review panels concerning the award of a grant or other program funding related to the CoC when there is a conflict of interest among CoC Board members.

### **VI. Continuum of Care Legal Entity**

The County of Orange is the Collaborative Applicant who will submit grants to HUD on behalf of the project applicants comprised in the Orange County CoC. All contracts funded by the CoC competition have direct contracts with HUD. Submission will be in compliance with § 578.9. The County of Orange is the designated administrative entity and fiscal agent for homeless services system funding awards that intersect with the CoC and the System of Care programs.

### **VII. Public Statement and Media Policy**

In the interest of presenting a unified voice in the community, the Collaborative Applicant, County of Orange, is the designated spokespersons and media points of contact for the Orange County CoC for inquiries or official statements related to the Orange County CoC. Members will refrain from making public comments or speaking to the media on behalf of the Orange County CoC, unless the Collaborative Applicant determines that the interests of the Orange County CoC are best served by another member speaking on behalf of the group. When making public statements or speaking to the media on issues related to homelessness, Members will make clear, to the best of their ability, whether they are speaking in their own organization's/individual's name or on behalf of the Orange County CoC.

## Orange County CoC - CA - 602 Governance Charter

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**Introduction:** In accordance with the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (the “HEARTH Act”) which was enacted into law on May 20, 2009, the Orange County Continuum of Care in consultation with the Collaborative Applicant (County of Orange), Continuum of Care and Emergency Solution Grant funded agencies and Homeless Management Information System (“HMIS”) Lead Agency has developed a governance charter which includes procedures and policies needed to comply with the HEARTH Act requirements as prescribed by U.S. Department of Housing and Urban Development (HUD); and a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board.

In addition to HEARTH Act compliance and in alignment with the Regional System of Care, the Continuum of Care (“CoC”) will operate to enhance, inform and implement services addressing the complex case management and housing needs of individuals and families experiencing homelessness in Orange County. Services supported by the Orange County CoC will also demonstrate best practices and evidence-based practices ensuring a client-centered approach, client choice and client rights and responsibilities are clear and service standards are consistently met.

The Orange County CoC designates the County of Orange as the collaborative applicant and fiscal entity for administering planning and funding for homelessness assistance program throughout the Orange County CoC.

### **I. Name:**

The technical name of the organization is CoC CA-602 hereinafter referred to as the “Orange County CoC”.

### **II. Geographic Boundaries:**

The Orange County CoC covers all the geography within the boundaries of Orange County, including its 34 cities and unincorporated areas as regionalized within North, Central and South Service Planning Areas.

### **III. Purpose:**

The Orange County CoC serves as the locally-designated primary decision-making group whose purpose and scope is to implement the Continuum of Care program (the “CoC”) which is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11381-11389). As noted in CFR 24 Part 578.1 Purpose and scope of the HEARTH Act, the program is designed to:

- A. Promote communitywide commitment to the goal of ending homelessness through regional coordination and collaboration;
- B. Advocate for funding and resources to end homelessness and provide funding for proven efforts by nonprofit providers and local governments to quickly rehouse people experiencing homelessness, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;
- C. Promote access to and effective utilization of mainstream programs by homeless individuals and families; and

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- D. Promote implementation of best practices and evidence-based approaches to homeless programming and services.

### IV. **Responsibilities of the Orange County CoC**

The four major responsibilities of the Orange County CoC consists of:

1. Operating the Continuum of Care,
2. Designating and operating an HMIS for the Continuum of Care,
3. Planning for the Continuum of Care, and
4. Preparing an application for funds which is in accordance with § 578.7 Responsibilities of the Continuum of Care and in the HEARTH Act and § 578.79.

#### A. **Operating the Continuum of Care.**

The Orange County CoC will:

1. Hold meetings of the full membership, with published agendas, at least semi-annually;
2. Make a public invitation for new members to join available within the geographic area at least annually;
3. Adopt and follow a written process to select a board to act on behalf of the CoC. The process must be reviewed, updated, and approved by the CoC at least every five (5) years;
4. Establish committees, subcommittees and ad hoc groups to address specific functions of the Orange County CoC, as needed;
5. Work with the Collaborative Applicant to develop and update annually a governance charter, which will include all procedures and policies needed to comply with HUD mandates, HEARTH Act regulations and 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 subrecipients to establish performance targets appropriate for population and program type, monitor Continuum of Care and Emergency Solutions Grant funded agencies performance, evaluate outcomes, and take action to address poor performers;
7. Evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program, and report performance measures to HUD as required;
8. In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and operate a Coordinated Entry System that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. The CoC must maintain specific policy to guide the operation of the Coordinated Entry System on how its system addresses the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from nonvictim service providers in compliance with any requirements established by HUD Notice; and

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9. In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, establish and consistently follow written standards for providing Continuum of Care assistance. At a minimum, these written standards must include:
  - a. Policies and procedures for evaluating individuals' and families' eligibility for assistance;
  - b. Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
  - c. Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;
  - d. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;
  - e. Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and
  - f. Where the CoC is designated a high-performing community, as described in Subpart G, policies and procedures set forth in 24 CFR 576.400(e)(vi), (e)(vii), (e)(viii), and (e)(ix).

### B. Designating and operating a Homeless Management Information System.

The Orange County CoC will:

1. Designate a single Homeless Management Information System (HMIS) for the geographic area;
2. Designate an eligible applicant to manage the CoC's HMIS, which will be known as the HMIS Lead;
3. Review, revise and approve a privacy plan, security plan, and data quality plan for the CoC HMIS;
4. Ensure consistent participation of recipients and subrecipients in the HMIS;
5. Ensure the HMIS is administered in compliance with requirements prescribed by HUD;
6. Ensure the HMIS operates efficiently and effectively to promote HUD funded and non-funded agency participation, system coordination, and utilization and performance is achieved; and
7. Ensure that HMIS captures the Coordinated Entry System Core Elements of Access, Assessment, Prioritization and Referral through program participation by recipients and subrecipients.

### C. Continuum of Care Policies, Procedures and Standards

The Orange County CoC will:

1. Have a Policies, Procedures and Standards Committee that meets at least two times a year or as needed for the review of policies, procedures and standards of the Orange County Continuum of Care;

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2. Have its various committees, subcommittees, and ad hocs proposed drafts, revisions and/or updates to policies, procedures and/ or standards be submitted to the Policies, Procedures and Standards Committee;
3. Have all proposed policies, procedures and standards reviewed and vetted by the Policies and Standards Committee to ensure adherence to the HEARTH Act, HUD Notices and regulations, best practices and evidenced-based approaches, prior to being presented to the CoC Board for adoption; and
4. Engage the public, including homeless and formerly homeless individuals, in policy and standards development and/or revisions that affect the operations of the CoC and ESG funded programs.

### D. Continuum of Care Planning.

The Orange County CoC and the Collaborative Applicant (County of Orange) will develop a plan that includes:

1. Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals, including unaccompanied youth, and families. At a minimum, this system encompasses the following:
  - a. Outreach, engagement, and assessment;
  - b. Shelter, housing, and supportive services;
  - c. Prevention and diversion strategies.
2. Planning for and conducting an annual shelter homeless count and a biennial unsheltered homeless count by Service Planning Area that meets the following requirements:
  - a. Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons;
  - b. Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons; and
  - c. Other requirements established by HUD Notice or to meet local objectives.
3. The HMIS Lead Agency will assist the Collaborative Applicant in conducting an annual gaps analysis of the homeless needs and services available within the geographic area and/or Service Planning Areas;
4. Providing information required to complete the Consolidated Plan(s) within the CoC's geographic area;
5. Consulting with State and local government Emergency Solutions Grants program recipients within the CoC's geographic area on the plan for allocating Emergency Solutions Grants program funds and reporting on and evaluating the performance of

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Emergency Solutions Grants program recipients and subrecipients. Emergency Solutions Grant entitlements include:

- County of Orange
- Santa Ana
- Anaheim
- Garden Grove

### E. Annual Competitive Application for Continuum of Care Funding

The Orange County CoC will:

1. Design, operate, and follow a collaborative process for the development of applications and approve the submission of applications in response to a Notice of Funding Availability (NOFA) published by HUD;
2. Establish priorities for funding proposals to meet needs within in the geographic area;
3. Support the Collaborative Applicant in compiling the required application information from all projects within the geographic area that the CoC has selected for funding; and
4. Retains all of its responsibilities, even if it designates one or more eligible applicants other than itself to apply for funds on behalf of the CoC. This includes approving the CoC application.

### V. Orange County CoC Structure:

The operations and management of the Orange County CoC and its responsibilities are structured in four segments.

#### A. CoC Collaborative Applicant and Fiscal Agent

The Orange County CoC designates the County of Orange as Collaborative Applicant and Planning Grant recipient for homelessness assistance programs throughout the Orange County CoC. The County of Orange will comply with the provisions of 24 CFR 578.7, including coordinating with the development of the CoC system, CoC planning, Coordinated Entry System, HMIS and the support of the various functions and activities as required by the HEARTH Act.

In addition, the Orange County CoC Board designates the County of Orange as administrative and fiscal entity for homeless funding to support the development of the System of Care. The County of Orange is the administrative and fiscal entity for state and local funding from homeless programming that designates the CoC as the eligible applicant and requires the local government entity to be the fiscal agent.

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### B. Orange County CoC Board

As noted in §578.5(b) of the HEARTH Act, “The Continuum of Care must establish a board to act on behalf of the Continuum using the process established as a requirement by § 578.7(a)(3) and must comply with the conflict-of-interest requirements at § 578.95(b).”

The Continuum of Care Board is therefore acting on behalf of the members of the Orange County CoC. To this end, the Orange County CoC will strategically comprise a governing board that represents the stakeholder groups enumerated in the HEARTH Act which require the CoC Board to be representative of relevant organizations and of projects serving homeless subpopulations within Orange County, including at least one (1) homeless or formerly homeless individual.

#### 1. Continuum of Care Board Responsibilities

The Continuum of Care Board will:

- a. Conduct the hands-on work and facilitate the committees, subcommittees and ad hoc groups of the Orange County CoC. Every member of the CoC Board must serve on a minimum of one committee, subcommittee, or ad hoc each year;
- b. Build community awareness of the needs of all homeless and at-risk populations identified in the CoC;
- c. Ensure, to the greatest extent possible, access to services by the subpopulations enumerated in this charter;
- d. Ensure relevant organizations and projects serving various homeless and at-risk subpopulations are represented in the planning and decision- making for the overall coordination of homeless services in the CoC;
- e. Ensure regional coordination and collaborative work across the CoC through the use of the Coordinated Entry System;
- f. Coordinate the CoC Programs and set goals and priorities for ending homelessness in Orange County;
- g. Approve Orange County CoC policies as recommended by committees;
- h. Create committees, subcommittees and ad hoc groups necessary for the proper and efficient functioning of the Orange County CoC, including the CoC program Notice of Funding Opportunity (NOFO); and
- i. Dissolve committees, subcommittees and ad hoc groups, if they are determined to be unnecessary for the proper and efficient functioning of the Orange County CoC.

#### 2. Continuum of Care Board Composition

The CoC Board is comprised of 19 to 25 members in total, who are elected by the voting General Membership, with an odd number of members selected during each election. A quorum consists of fifty percent (50%) plus one (+1) voting members present. The CoC Board shall be comprised of members that provide a well-balanced perspective with multiple experiences and backgrounds to best lead the response to homelessness in the Orange County CoC.

- a. The CoC Board designations are: The CoC Board includes three (3) Officers, who shall be elected by the CoC Board each year. These positions include:

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- i. Chair: Responsible for leading the monthly CoC Board meetings and facilitating the work of the Orange County CoC, as determined in this Charter.
  - ii. Vice-Chair: Responsible for chairing CoC Board meetings in the absence of Chair or when Chair must recuse themselves
  - iii. Secretary: Responsible for tracking attendance and motions for CoC Board meetings, reviewing the draft CoC Board meeting minutes, and chairing CoC Board meetings in the absence of both the Chair and Vice Chair, or when Chair and Vice Chair must recuse themselves
- b. The CoC Board shall have 19 to 25 total CoC Board member seats, with an odd number of members appointed during each election. The makeup of the CoC Board shall include at least the following number of people with each of these experiences and backgrounds. One person may represent more than one of these experiences and backgrounds. By January 2027, the CoC Board will include at least one representative from the Youth Action Board (YAB).
- i. People who have experienced homelessness or housing instability. At least 30% of the CoC Board must be comprised of people with lived experience, though the CoC Board can prioritize including more in any given year. This includes:
    - 1. At minimum, two (2) seats will be determined by the Lived Experience Advisory Committee (LEAC). This could be the LEAC chair or someone else.
    - 2. At minimum, two (2) seats will be determined by the YAB. This could be the YAB chair or someone else.
    - 3. It is important to the CoC Board that the Board members with lived experience of homelessness represent an array of household and age makeups. However, because some people with lived experience may not want to disclose that experience publicly, there are no required seats for people from specific household types or age groups. Ideally, the Board is recommended but not required to include at least one person from each of the following groups:
      - a. Lived experience of homelessness as a Transitional Age Youth (TAY) in the last five (5) years
      - b. Lived experience of homelessness as a single adult
      - c. Lived experience of homelessness with their family
      - d. Lived experience of homelessness as an older adult
      - e. Lived experience of homelessness as a person with a disability
  - ii. People whose experiences reflect those of the people experiencing homelessness within the CoC. Each nomination and election cycle, the CoC Nominating Ad Hoc will utilize the most recently available data, including but not limited to HMIS, Point-in-Time (PIT) Count, and American Community Survey (ACS) data, to determine how to prioritize desired representation and expertise to ensure that the CoC Board membership background and experience recommendations align with current trends in who experiences

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homelessness in Orange County.

iii. People who are currently representing, in a professional capacity, the following:

1. Veteran/military service-focused agency (at least 1)
2. Emergency Solutions Grant (ESG) Program entitlement jurisdiction (at least 1)
3. Public Housing Agency (PHA) (at least 1)
4. Domestic violence agency (at least 1)
5. Education field / McKinney-Vento liaison (at least 1)
6. Behavioral health field, which may include a Certified Community Behavioral Health Clinic (CCBHC) (at least 1)
7. Health care field, which may include a Federally Qualified Health Center (FQHC), Healthcare for the Homeless, or other accessible primary care provider (at least 1)
8. TAY Agency (at least 1)
9. Family Agency (at least 1)
10. Business community, such as a member of the Business Improvement District
11. Law enforcement
12. Recovery Housing or Sober Living provider
13. Local workforce development organization, such as a member of the local Workforce Development Board, State Workforce Agencies, or American Job Centers
14. Local court system managing Assisted Outpatient Treatment (AOT) and/or other civil commitment processes, or from specialty courts (e.g. Mental Health Court, Drug Court, Care Court)
15. People with experience with the following parts of the CoC. Ideally, the CoC Board will include members who represent all parts of the system, but at minimum the CoC Board must include members who represent at least three (3) of the following:
  - a. Diversion
  - b. Street Outreach
  - c. Prevention
  - d. Emergency Shelter
  - e. Rapid Rehousing
  - f. Permanent Supportive Housing
  - g. Faith-based organization or community
  - h. Affordable housing development background

c. Continuum of Care Board Support

- i. Collaborative Applicant – Shall serve as the designated entity responsible for coordinating and supporting the Continuum of Care (CoC) overall governance, planning, funding, and compliance activities for state and federal funding sources. This may be led by the CoC Manager and/or other County of Orange staff, in coordination with the CoC Board Officers.
- ii. HMIS Lead Agency – Shall be responsible for the administration, oversight, and ongoing management of the CoC's Homeless Management Information

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System (HMIS), including data quality, security, reporting, system compliance, and technical support, consistent with applicable federal, state, and local requirements. Shall work collaboratively with the Collaborative Applicant to provide data to the CoC Board to assist in evaluating utilization, performance and system gaps.

- iii. Coordinated Entry System Lead Agency – Shall be responsible for the administration and oversight of the CoC's Coordinated Entry System (CES), ensuring that access, assessment, prioritization, and referral processes are implemented consistently, equitably, and in accordance with applicable policies and procedures, as approved by the CoC Board.

### 3. Continuum of Care Board Selection Process

In advance of each term expiration, the following steps are to be completed to select new CoC Board Members:

- a. A Nominating Ad Hoc of at least six (6) people will be appointed annually by the CoC Board Chair.
  - i. At least one (1) member of the Nominating Ad Hoc will be a CoC Board member whose seat is not up for election.
  - ii. At least one (1) member of the Nominating Ad Hoc will be a Voting General Member or represent an organization that has a Voting General Member.
  - iii. At least four (4) members of the Nominating Ad Hoc will not be current CoC Board members.
- b. The Nominating Ad Hoc will review the CoC Governance Charter (Charter) and make any proposed revisions needed to ensure the CoC Board composition, selection process, and qualifications align with the community's priorities and the backgrounds and experiences of key partners, including people with lived experience, in the community. The Nominating Ad Hoc will review the most recently available data to provide due diligence to ensure that the CoC Board membership background and experience recommendations align with current trends in who experiences homelessness in Orange County. The recommended Charter changes will go to the CoC Board for approval. Should the CoC Board provide feedback or recommendations to the proposed changes, the Nominating Ad Hoc will review feedback and incorporate the CoC Board recommendations into the Charter to inform the nomination and election process. In the event that the Nominating Ad Hoc is not in agreement with the CoC Board feedback and recommendations to the Charter, the Nominating Ad Hoc will submit a new version of the Charter for the CoC Board to review and approve before the rest of the CoC Board nomination and election process moves forward.
- c. The Nominating Ad Hoc will support the Collaborative Applicant in outreach to potential CoC Board candidates to make them aware of the upcoming CoC Board election. These outreach efforts will help ensure adequate representation of backgrounds and experiences listed in the CoC Board composition.
- d. The Voting General Membership will be notified of the nomination period, start and end, as well as the process to nominate a candidate or express interest in being a candidate.

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- e. The Nominating Ad Hoc will support the Collaborative Applicant in reviewing submitted applications and verifying qualifications and background and experience of all candidates who apply to serve as CoC Board Members or Officers. The Nominating Ad Hoc will determine a process to verify all candidates meet minimum qualifications before referring such candidates to the CoC General Membership.
- f. The CoC General Membership will vote by secret ballot on the slate of qualified candidates. The Nominating Ad Hoc will utilize a prioritization tool that identifies candidates with the highest votes and ensures desired representation of various experiences and backgrounds for the CoC Board membership. The selected candidates will be presented to the CoC Board for ratification. If the selected candidates are not ratified by the CoC Board, the Nominating Ad Hoc may review the results of the voting and selection process and return to the CoC Board at the following meeting.
- g. The Lived Experience Advisory Committee (LEAC) will select a minimum of two people to represent them on the CoC Board. The CoC General Membership will not vote on the representatives' participation on the CoC Board.
- h. The Youth Action Board (YAB) will select a minimum of two people to represent them on the CoC Board. The CoC General Membership will not vote on the representatives' participation on the CoC Board.
- i. Should a member leave before the expiration of their term, the Collaborative Applicant will confirm whether the vacancy needs to be filled to meet the designated CoC Board composition. The Collaborative Applicant will utilize the applications and prioritization tool from the most recent election to identify a candidate with the highest votes and fulfills desired representation. If the\*designated CoC Board composition cannot be fulfilled, the Collaborative Applicant will follow the same process as outlined above in items a. through f. Appointments made to fill a vacancy left by a member before the expiration of their term shall be for the remaining term of the member.
- j. The traditional nominating and election timeline is as follows:
  - i. August/September – CoC Board Chair appoints Nominating Ad Hoc
  - ii. September/October – Nominating Ad Hoc convenes to review and update sections of the Charter that pertain to the CoC Board composition, selection process, and qualifications
  - iii. October/November – Nominating Ad Hoc outreaches to potential CoC Board candidates. The Nominating Ad Hoc will determine a process to verify that CoC Board candidates meet minimum qualifications for the Board.
  - iv. November/December – Candidates who moved forward are presented to the CoC General Membership for voting/election.
  - v. December – CoC Board ratifies slate of elected candidates by the CoC General membership.
  - vi. January – CoC Board seating takes place. Outgoing CoC Board and CoC Board Support will provide training and orientation for incoming CoC Board.
- k. CoC Board Member Terms
  - i. CoC Board members will serve a three (3) year term;

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- ii. CoC Board members will be given the option to renew their term after the completion of one (1) term, membership on the CoC Board will be confirmed through the election process by the CoC General membership;
  - iii. CoC Board members will serve no more than two (2) consecutive full terms;
  - iv. CoC Board members who have served two (2) consecutive full terms must wait one (1) year before being eligible to serve again on the CoC Board
- l. At the first meeting of the calendar year, the CoC Board will elect the Board Officers (Chair, Vice-Chair and Secretary) to serve for one-year terms. CoC Board Officers may serve for more than one (1) term.

#### 4. Continuum of Care Board Qualifications

All CoC Board members must bring a commitment to the work to end homelessness using best practices adopted locally. CoC Board members with lived experience of homelessness who are not also representing a local organization will be compensated for their time and expertise using the CoC's current compensation methods and rates.\* The Orange CoC Board Members and Officers are selected to represent various personal and professional backgrounds, experiences, and entities. As a whole, the Board should:

- i. Be representative of the people who experience homelessness in Orange County;
  - ii. Have complementary skill sets;
  - iii. Represent a balance of community partners in the region; and
  - iv. Be willing to collaborate with other potential CoC Board Members and bring in new leaders.
- b. Potential and current CoC Board Members must be current voting General Members who demonstrate:
- i. A high level of ethical behavior, including compliance with the Conflict of Interest and Recusal process as defined in this Charter;
  - ii. Working knowledge of, compassion about, and commitment to ending homelessness and furthering effectiveness and collaboration within the CoC Board and across the CoC's work.
  - iii. Leadership and collaborative spirit in the best interest of the Orange County CoC.
  - iv. Willingness and ability to consistently attend meetings and participate in Committees, with accommodation as needed.
- c. All CoC Board members must attend at least 75% of meetings each year and not be absent for three (3) consecutive meetings in order to remain in good standing. All CoC Board members must also participate in at least one (1) committee, working group, or ad hoc each year, and attend at least 75% of the meetings. CoC Board Members failing to meet the attendance standard will be subject to removal by majority vote fifty percent plus one (50% + 1) of the CoC Board.
- i. When there is a strategic plan, CoC Board members serving as a Chair of a committee will be de-facto owners of their committees' assigned strategies to own. Should a CoC Committee Chair be unable to participate as an owner,

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a representative from their CoC Committee may be appointed.

### 5. Continuum of Care Board Meetings

1. All meetings will be open to the public except as otherwise determined by the CoC Board. Any person who attends an Orange County CoC meeting may be asked by the CoC Board Chair to leave if the person is disruptive; if a conflict of interest applies; or if an agenda business item(s) is deemed by the CoC Board Chair to be of such nature that it involves only Orange County CoC closed session business.
2. Robert's Rules of Order Abridged-Revised will guide the process during all meetings.
3. An annual calendar of the CoC Board meetings will be recommended to the CoC Board for adoption at the CoC Board meeting in October and presented at the Service Provider Forum meeting in November. The CoC Board meetings calendar will be distributed to all members electronically and published on the County of Orange – Homeless Services website.

### 6. Continuum of Care Board Documentation

1. The Orange County CoC Board will conduct and transact business in a fair and transparent manner. To this end, the CoC Board will maintain records of all Orange County Continuum of Care agendas and minutes and make these available upon request.
2. The Collaborative Applicant will keep record of all HEARTH Act policies, calendars, meeting minutes, and records.

### 7. CoC Board Conflict of Interest and Code of Conduct

1. Conflict of Interest – Members serving on the CoC Board or any of its committees, ad hocs and/or working groups, shall abstain from voting on any issue in which they may be personally vested to avoid a conflict of interest in accordance with County, State and Federal laws, regulations and ordinances and shall refrain from engaging in any behavior that conflicts with the best interest of the CoC. Members must comply with the conflict of interest and recusal process found in the § 578.95 Conflicts of interest of the HEARTH Act<sup>1</sup> and any additional requirements as outline in the Charter and the Orange County CoC Conflict of Interest Policy and Procedure (Attachment A).
  - a. Members shall not vote nor attempt to influence any other Member on a matter under consideration by the CoC Board or any of its committees, ad hocs or working groups as follows:

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<sup>1</sup> 1 CFR 24 578.95 § 578.95 Conflicts of Interest: <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>

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- i. Regarding the provision of services by such member (or by an entity that such member represents); or
    - ii. By providing direct financial benefit to such member or the immediate family of such member; or
    - iii. Engaging in any other activity determined by County, State or Federal law, regulations and ordinances to constitute a conflict of interest.
  - b. Determining Whether a Conflict of Interest Exists – If a question arises as to whether a conflict exists that may prevent a Member from voting, the CoC Board Chair or designee may consult with designated Collaborative Applicant staff to assist in making that determination.
  - c. Neither the CoC Board nor any of its Members shall promote, directly or indirectly, any political party, political candidate or political activity using the name, emblem or any other identifier of the CoC Board.
  - d. No assets or assistance provided by the Collaborative Applicant to the CoC Board shall be used for sectarian worship, instruction, or proselytization, except as otherwise permitted by law.
2. Code of Conduct – Members serving on the CoC Board or any of its committees, ad hocs or working groups, are entrusted with specific responsibilities related to use of public funds invested in addressing homelessness. Members are expected to observe the highest standards of ethical conduct in the execution of these responsibilities. In the performance of their duties, Members are expected to carry out the mandate of the Orange County CoC to the best of their ability and to maintain the highest standards of integrity while interacting with other Members, Orange County CoC representatives, service recipients, service providers, and the public, as outlined in the Orange County CoC Code of Conduct (Attachment B).
- a. The Orange County CoC prohibits the solicitation and acceptance of gifts or gratuities by the CoC Board, committees, ad hocs or working groups, Voting Members, or employees and agents of the Collaborative Applicant from anyone who intends to receive personal benefit or preferential treatment. Violation of any portion of this Code of Conduct could subject a CoC Voting Member to immediate termination from membership as determined by the CoC Board;
  - b. The Orange County CoC promotes impartiality in performing official duties and prohibits any activity representing a conflict of interest. Individuals should not act on a matter if a reasonable person who knew the circumstances of the situation could legitimately question fairness;
  - c. Members shall:
    - i. Put forth honest effort in the performance of their duties;

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- ii. Not knowingly make unauthorized commitments or promises of any kind purporting to bind the Orange County CoC without previous CoC Board approval;
  - iii. Disclose waste, fraud, abuse and corruption to the appropriate authorities;
  - iv. Adhere to all laws and regulations that provide equal opportunity to all United States citizens regardless of race, color, religion, sex, gender, sexual orientation, national origin, age, or disability, or any other protected category;
  - v. Conduct themselves with courtesy and respect. Personal relationships should not result in special considerations that influence the performance of their official duties in a manner contrary to the interest of the broader Orange County CoC. Members are expected to exercise adequate control and supervision over matters for which they are individually responsible.
  - vi. Assure that the resources entrusted to them are used for conducting official business only. Members of the CoC Board must abide by the Conflict of Interest Policies established for CoC Board operations (See Section V.B.7.1.).
  - vii. Protect any confidential information provided to, or generated by, the activities of the Orange County CoC; and
  - viii. Not use confidential information of the Orange County CoC for any purpose or disclose such confidential information to any third party, except as necessary to perform their duties and responsibilities as members of the CoC Board.
3. Termination Policy - Any Member, or the entire CoC Board, may be removed for cause by a two-thirds (2/3) vote of the Orange County CoC Voting Membership at a specially called meeting. Cause is constituted by a violation of the Conflict of Interest regulations or a violation of the Code of Conduct.

### C. CoC General Membership

CoC General Membership is based upon organizations within the Geographic Area participating in the responsibilities of the Orange County CoC by having organizational representatives actively participate in CoC Board, committees, ad hocs and working groups.

As noted in § 578.5 Establishing the CoC. Relevant organizations will include:

“Nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies,

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hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans and homeless and formerly homeless individuals.”

Additionally, the Orange County CoC will strive to ensure representation from an array of public agencies including those dedicated to behavior health; substance use recovery services; health; employment training and development; youth; and housing and community development.

a. Nominations for Orange County CoC General Membership

A public invitation within the Geographic Areas of the CoC will be extended annually for new members to join in accordance with the HEARTH Act as described in § 578.7 Responsibilities of the CoC.

b. General Membership Terms

There is no term limit. Membership, however, may be terminated by the Orange County CoC in accordance with subsection I. Removal below.

c. Continuum of Care Meetings

The Orange County CoC will hold meetings of the full membership with published agendas at least twice a year. The Orange County Service Provider Forum serves to facilitate CoC full membership meetings.

d. Quorum

A number equal to a majority of those belonging to the Orange County CoC will constitute a quorum for the transaction of business at any general membership meeting.

e. Voting

At all meetings, business items may be decided by arriving at a consensus. If a vote is necessary, all votes will be by voice or ballot at the will of the majority in attendance. The exception to this rule is a vote to elect Members, in this case a vote will be held by secret ballot. Each active organization will have one vote given by one representative even when more than one organizational representative is present. No active organization may vote on any item which presents a real or perceived conflict-of-interest.

f. Conflict of Interest

CoC General Members must comply with the conflict of interest and recusal process found in the § 578.95 Conflicts of interest of HEARTH Act<sup>2</sup> and any additional requirements as outline in the Charter and the Orange County CoC Conflict of Interest Policy and Procedure (Attachment A).

g. Code of Conduct

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<sup>2</sup> CFR 24 578.95 § 578.95 Conflicts of Interest: <https://www.hudexchange.info/resource/2035/coc-program-interim-rule-formatted-version/>

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Members will ensure a commitment to the Orange County CoC Code of Conduct (Attachment B).

h. Removal

Any CoC General Member of the Orange County CoC may be removed by a two-thirds majority of all organizations present during a scheduled meeting.

D. Collaboration with Commission to End Homelessness

The Commission to End Homelessness focuses on regional policy and implementation strategies, affordable housing development, data and gaps analysis, best practice research, social policy and systems change to promote an effective response to homelessness within the County of Orange. The CoC Board will regularly provide information and recommendations around CoC funded homeless programs to the Commission to End Homelessness. This will ensure regional alignment of efforts to resolve homelessness.

1. The CoC Board will collaborate with the Commission to End Homelessness to:
  - a. Address gaps within the System of Care;
  - b. Strengthen operational performance;
  - c. Ensure regional access and alignment;
  - d. Receive expertise related to each System of Care component in support of the CoC System integration objectives; and
  - e. Identify, secure and prioritize funding opportunities that provide system enhancements within the five components of the System of Care” Community Corrections, Behavioral Health, Healthcare, housing, Benefits and Support Services.
2. The CoC Board will at least annually report to the Commission to End Homelessness on the progress of the Orange County CoC. These reports may include:
  - a. HUD System Performance Measures (SPM) Report
  - b. Housing Inventory Chart (HIC)
  - c. Gaps Analysis Reports
  - d. Point-in Time (PIT) Count (unsheltered biennially and sheltered annually)
  - e. Funding priorities, grants and funding awards from federal and state government
  - f. Any other reports requested by the Commission to End Homelessness to help further system of care policy recommendations and regional system

development.

3. The chairperson of the CoC Board and the Commission to End Homelessness may establish ad hoc committees to provide recommendations regarding time-limited tasks that support the goals of the Commission to End Homelessness and assist in the functions of the CoC Board.
4. Non-conflicted Commission to End Homelessness members may participate on review panels concerning the award of a grant or other program funding related to the CoC when there is a conflict of interest among CoC Board members.

**VI. Continuum of Care Legal Entity**

The County of Orange is the Collaborative Applicant who will submit grants to HUD on behalf of the project applicants comprised in the Orange County CoC. All contracts funded by the CoC competition have direct contracts with HUD. Submission will be in compliance with § 578.9. The County of Orange is the designated administrative entity and fiscal agent for homeless services system funding awards that intersect with the CoC and the System of Care programs.

**VII. Public Statement and Media Policy**

In the interest of presenting a unified voice in the community, the Collaborative Applicant, County of Orange, is the designated spokespersons and media points of contact for the Orange County CoC for inquiries or official statements related to the Orange County CoC. Members will refrain from making public comments or speaking to the media on behalf of the Orange County CoC, unless the Collaborative Applicant determines that the interests of the Orange County CoC are best served by another member speaking on behalf of the group. When making public statements or speaking to the media on issues related to homelessness, Members will make clear, to the best of their ability, whether they are speaking in their own organization's/individual's name or on behalf of the Orange County CoC.

**Date:** October 28, 2026

**Subject:** Policies, Procedures and Standards (PPS) Committee Recommendation

**Recommended Action:**

- a. Approve revisions to the Homelessness Management Information System (HMIS) Policies and Procedures, inclusive of changes to the HMIS Data Quality Plan, Notice Regarding Collection of Personal Information, and Participating Agency Agreement, as recommended by the PPS Committee.

**Background**

On an annual basis, 2-1-1 Orange County (211OC), a key service of Orange County United Way, as the HMIS Lead for the Orange County Continuum of Care (CoC), initiates a review of the HMIS Policies and Procedures, as well as all related privacy and security documentation. 211OC convened the HMIS Working Group six times from May 2026 to August 2026 to review all materials and propose revisions. After updated drafts were shared with the working group, a community feedback period was held from September 1, 2026, through September 18, 2026. In addition, proposed changes were presented to the Lived Experience Advisory Committee (LEAC) for feedback on September 2, 2026. On October 7, 2026, the HMIS Policies and Procedures, HMIS Data Quality Plan, Notice Regarding Collection of Personal Information, and Participating Agency Agreement were reviewed and approved by the LEAC. On October 13, 2026, the same documents were approved by the PPS Committee. After receiving feedback from the PPS Committee, a revision was added to the Consent to Share Protected Personal Information form for review by the CoC Board.

A summary of the proposed revisions to all documents is available in **Attachment A**. Feedback received during the review process is available in **Attachment B**. The CoC Board is being asked to review and approve the revised HMIS Policies and Procedures (**Attachment C**), the OC HMIS Participating Agency Agreement (**Attachment D**), Notice Regarding Collection of Personal Information (**Attachment F**), the OC HMIS Data Quality Plan (**Attachment H**), the OC HMIS Sample Agency Data Quality Plan (**Attachment J**), and the Consent to Share Protected Personal Information (**Attachment K**).

**Attachments**

Attachment A – OC HMIS Policy and Privacy Documentation Proposed Revisions  
Attachment B – OC HMIS Policy and Privacy Documentation Feedback Received  
Attachment C – OC HMIS Policies and Procedures (Redlined Version)  
Attachment D – OC HMIS Participating Agency Agreement (Redlined Version)  
Attachment E – OC HMIS Participating Agency Agreement (Clean Version)  
Attachment F – Notice Regarding Collection of Personal Information (Redlined Version)  
Attachment G – Notice Regarding Collection of Personal Information (Clean Version)  
Attachment H – OC HMIS Data Quality Plan (Redlined Version)  
Attachment I – OC HMIS Data Quality Plan (Clean Version)  
Attachment J – OC HMIS Sample Agency Data Quality Plan  
Attachment K – Consent to Share Protected Personal Information (Redlined Version)  
Attachment L – Consent to Share Protected Personal Information (Clean Version)

## Orange County Homeless Management Information System (HMIS) Policy and Privacy Documentation Summary of Proposed Revisions

### HMIS Policies and Procedures

- Key Terms & Acronyms
  - New: Definitions for Universal Data Elements, Program Specific Data Elements, and Program Descriptor Data Elements.
- Help Desk
  - New: References HMIS Calendar for holidays and closures.
  - New: HMIS Help Desk with provide weekly updates for tickets that take longer than 3 days to resolve.
  - New: Any client-identifying data sent to the HMIS Help Desk from a Participating Agency will be considered a data breach, and will be handled according to the policies in that section.
- Agency Access
  - Clarification: Any organization can participate in HMIS as long as they meet the requirements for access, including faith-based or community organizations.
  - Clarification: Organizations may be denied access to HMIS if the organization's activities are not aligned with housing stability or service provision.
- Participating Agency Requirements
  - Clarification: Any user at the agency can attend HMIS User Meetings to meet minimum participation requirements.
- HMIS User Requirements
  - Clarification: Agency Administrators must complete an Agency Administrator training in addition to the required trainings for HMIS users.
- Agency Administrator Requirements
  - Clarification: Process for removing HMIS access for users.
  - New: HMIS Lead should be notified of users that no longer need access to HMIS within 2 business days.
  - Clarification: Data quality thresholds for data completeness and data timeliness for all projects participating in HMIS.
  - Clarification: Process for reporting changes in project set-up, including bed inventory and funding changes.
  - New: Project set-up changes must be reported to the HMIS Lead within 5 business days.
  - New: Project closures must be reported to the HMIS Lead within 15 business days of closure. Also, projects should be closed when they are not providing services for over 30 days.
  - New: Agency Administrators must be employed by the Participating Agency, and cannot be a volunteer.

### Item 3. Attachment A.

*As submitted by Orange County United Way's 2-1-1 Orange County (211OC)*

- Privacy
  - New: HMIS passwords should not be autosaved on any device, and if a password needs to be stored, a password manager should be used.
  - Clarification: Users that have been deactivated need to take the HMIS Reactivation Training Course and HMIS Skill Test to reactivate the account.
  - Clarification: Users that transition from one Participating Agency to another may have their HMIS account reactivated without requiring additional training if the user has logged into their account within the last 60 days, and the user will maintain the same level of access to HMIS.
  - New: Participating Agencies may send the Client Consent to Share Protected Personal Information Form electronically via applications such as DocuSign.
  - Clarification: Participating Agencies must explain that signing the Client Consent to Share Protected Personal Information form means that the client's record will be shared with other HMIS Participating Agencies for care coordination, and that the client's data may be shared in data requests approved by the CoC Board for analytical use or academic research purposes.
  - Clarification: Note Regarding Collection of Personal Information must be available in all areas where staff are collecting data from clients to be entered into HMIS. Outreach teams should have paper or virtual copies to share with clients.
- Client Record Requests
  - New: Allows clients to request their record directly from the HMIS Lead.
  - Clarification: Provides guidance on how to verify a client's identity in person or virtually.
  - Clarification: Provides guidance on how client records can be shared with clients.
  - New: Documentation that the client provided or signed can now be included in Client Record Requests.
  - Clarification: Client Record Request Form Documentation will be included with the client's record to provide details about information included in the record.
  - New: Prior to sharing case notes, Participating Agencies must redact identifying third party information, like staff or agency names, names of other clients, or shelter bed numbers.
- Data Release
  - Clarification: Service Providers with access to Coordinated Entry data are not permitted to publish any Coordinated Entry data without approval of the CoC Board as outlined in the Data Request Matrix.
  - Clarification: The CES Lead and CES Administrators are required to adhere to policies outlined in the HMIS Policies and Procedures regarding Data Release.
  - New: Data requests must include a local stakeholder within the CoC that will be responsible for sharing the results of the request, and implementing changes within the CoC as appropriate.
  - New: Exploratory data requests must include HMIS data as the primary focus of the analysis. Using HMIS data anecdotally in larger analyses will not be permitted.
- Data Breach
  - New: Participating Agencies will make at least 3 attempts over 2 weeks to notify clients impacted by data breaches using telephone, secure email, and mail.

### Item 3. Attachment A.

*As submitted by Orange County United Way's 2-1-1 Orange County (211OC)*

- New: Establishes corrective actions for data breaches.

#### HMIS Data Quality Plan

- Clarification: Added guidance for understanding the different data quality components.
- Clarification: Added guidance for reviewing data accuracy, and reducing missing data.
- New: Added a sample data quality plan to help Participating Agencies develop their own plans.

#### Note Regarding Collection of Personal Information

- Clarification: Simplified language.

#### Participating Agency Agreement

- Clarification: Added additional language regarding client consent and user access.
- Clarification: Client data can still be entered into HMIS if the client doesn't give consent to share data.
- New: Removed HMIS Lead signature.

#### Consent to Share Protected Personal Information

- New: Added section for clients to confirm their understanding that by signing the form their record will be shared with other HMIS participating agencies and included in data requests approved by the CoC Board.

### Item 3. Attachment B.

As submitted by Orange County United Way's 2-1-1 Orange County (211OC)

## Homeless Management Information System (HMIS) Policy and Privacy Documentation

Feedback Received from May 2026 – September 2026

### HMIS Policies and Procedures Working Group Feedback: May 2026 – August 2026

| Section                           | Feedback                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Key Terms & Acronyms              | Add definitions for Universal Data Elements, Program Specific Data Elements, and Program Descriptor Data Elements | Added definitions                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Help Desk                         | Agency Administrators would like more regular updates on tickets that are not resolved within 3 business days     | Added: HMIS Staff will provide weekly updates for tickets that may take longer than 3 business days to resolve. Some examples of tickets that may take additional time: solutions requiring coordination between partner agencies, system error tickets escalated to the HMIS vendor, or tickets pending additional guidance from outside entities, like the OC Collaborative Applicant, the CES Administrator, or federal or state technical assistance departments. |
| Data Breach                       | Add corrective action plan for data breaches                                                                      | Added corrective action plan for up to four occurrences of data breaches by one user.                                                                                                                                                                                                                                                                                                                                                                                 |
| Agency Access                     | HMIS access should be expanded to community-based and faith-based organizations                                   | Added: Organizations are not limited to non-profit service providers, and may include faith-based or community organizations, as well as any other organization that meets the criteria in this section.                                                                                                                                                                                                                                                              |
| Agency Access                     | Add additional details regarding why an agency may be denied HMIS access                                          | Added: The Agency Access Working Group may deny access to HMIS if the organization's activities are not aligned with housing stability or service provision. Reasons for denial may include but are not limited to: the organization does not have an established history of service delivery or outreach, service delivery is inconsistent or sporadic, or the organization doesn't have the capacity to participate fully in HMIS.                                  |
| Data Quality Plan                 | Add corrective action plan for data quality issues                                                                | The Enforcements section in the Data Quality Plan includes a corrective action plan.                                                                                                                                                                                                                                                                                                                                                                                  |
| Participating Agency Requirements | More education and awareness for agency leadership regarding data quality and performance                         | The HMIS Lead is considering an implementation plan for this feedback. A policy will be created if needed once the plan is finalized.                                                                                                                                                                                                                                                                                                                                 |

### Item 3. Attachment B.

As submitted by Orange County United Way's 2-1-1 Orange County (211OC)

|                                   |                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------------------|---------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Agency Administrator Requirements | Annual recertification should be required for Agency Administrators                               | Added requirement to Policies and Procedures, but received conflicting community feedback. HMIS Lead is releasing a survey for Participating Agency feedback.                                                                                                                                                                                                                                                                                                          |
| Privacy                           | Include policy for users that transition from one HMIS Participating Agency to another            | Added: Users that transition from one Participating Agency to another may have their HMIS account reactivated without requiring additional training if the user has logged into their account within the last 60 days, and the user will maintain the same level of access to HMIS.                                                                                                                                                                                    |
| Privacy                           | Consider whether clients should have a consent form signed every time they begin a new enrollment | This may be cumbersome for Participating Agencies. Instead, the HMIS Lead is developing a quarterly process for Participating Agencies to review client consent records and collect updated forms as needed.                                                                                                                                                                                                                                                           |
| Client Record Requests            | Add guidance on how to verify a client's identity for client record requests                      | Added link to knowledge base article for instructions on how to verify a client's identity virtually or in person.                                                                                                                                                                                                                                                                                                                                                     |
| Client Record Requests            | Give guidance on how a Participating Agency should determine whether or not to share case notes   | Added: Participating Agencies are encouraged to review their liability insurance and the contents of the case notes prior to sharing with a client.                                                                                                                                                                                                                                                                                                                    |
| Data Release                      | Add more policies around Coordinated Entry data                                                   | Added: Service Providers with access to Coordinated Entry data are not permitted to publish any Coordinated Entry data without approval of the CoC Board as outlined in the Data Request Matrix.<br>The CES Lead and CES Administrators are required to adhere to policies outlined in this section.                                                                                                                                                                   |
| Data Breach                       | Provide guidance on how many attempts should be made to notify a client when a data breach occurs | Added: Participating Agencies will make at least 3 attempts over 2 weeks to notify the client impacted by the following methods; telephone, secure email, and mail. The outreach attempts will be documented as case notes in HMIS.<br>Participating Agencies will at a minimum in compliance with the policies outlined in this document. Participating Agencies will be required to also be in alignment with their internal agency policies related to data breach. |

### Item 3. Attachment B.

As submitted by Orange County United Way's 2-1-1 Orange County (211OC)

#### Lived Experience Advisory Committee (LEAC) Feedback: September 2026

| Section               | Feedback                                                                             | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Data Release          | The HMIS Lead should charge fees for data requests                                   | This feedback is under consideration. The HMIS Lead will allocate a certain number of hours for data requests that are approved by the CoC Board on an annual basis. The CoC Board will determine which data requests should be approved to use those hours.                                                                                                                                                                                                                                  |
| Data Quality Plan     | Include a policy about correcting Approximate Date Homelessness Started (ADHS) field | The HMIS Lead has implemented parameters in data quality reporting to identify logic errors with the ADHS field, like dates after the client's Project Start Date or before the client's Date of Birth. The HMIS Lead is continuing to develop training materials and tool tips in HMIS to help users capture this field correctly, as well as highlighting old records for review by agencies during quarterly data quality reviews.                                                         |
| Client Record Request | Include contact information so clients can contact HMIS Lead                         | Added: To submit a ticket directly to the HMIS Lead, clients can call the HMIS Help Desk at 714-589-2360. Requests submitted to the HMIS Lead will be responded to in accordance with policies outlined in the Help Desk section of this document.<br><br><a href="#">Client Record Request</a> web page will also be updated.                                                                                                                                                                |
| Data Release          | Include policy to require results of data requests to return to the CoC Board        | Added: Data requests must intend to facilitate positive impact on the structure or processes within the Orange County Continuum of Care, or otherwise benefit people experiencing homelessness or at risk of homelessness in the Orange County Continuum of Care. Requests must include a local stakeholder or "champion" within the Continuum of Care that will be responsible for sharing the results of the request, and implementing changes within the Continuum of Care as appropriate. |

#### Community Feedback Period: September 2026

| Section                               | Feedback                                                                                                | Response                                                                                             |
|---------------------------------------|---------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|
| Agency Administrator Responsibilities | Agency Administrators should be employees of the agency, not a volunteer position                       | Added: Agency Administrators must be employed by the Participating Agency, and cannot be volunteers. |
| HMIS User Requirements                | User recertifications are cumbersome, and may require training on components not relevant to some users | The HMIS Lead will release a survey to seek HMIS Participating Agency feedback.                      |

### Item 3. Attachment B.

As submitted by Orange County United Way's 2-1-1 Orange County (211OC)

|                        |                                                                                                                                  |                                                                                                                                                                                         |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Client Record Requests | Remove third party information from case notes released by a Participating Agency                                                | Added: Prior to sharing case notes, Participating Agencies must redact identifying third party information, like staff or agency names, names of other clients, or shelter bed numbers. |
| Data Quality Plan      | Add a requirement for agencies to review their data annually and submit a narrative of any issues, and an action plan to resolve | The HMIS Lead is considering an implementation plan for this feedback. A policy will be created if needed once the plan is finalized.                                                   |

#### HMIS Participating Agency User Recertifications Survey: September 2026 (37 respondents)

| Section                | Feedback                                                                                                                                                                                                                                               | Response                                                                                                                                                                                                |
|------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| HMIS User Requirements | 92% of respondents (34) agree or strongly agree that the User Recertification is beneficial to review topics such Client Privacy, Data Collection and System Updates. 78% (29) said the annual User Recertifications should be required for all users. | The requirement for annual User Recertifications will continue.                                                                                                                                         |
| HMIS User Requirements | 51% of respondents (19) said that there should not be an annual Recertification for Agency Administrators in addition to the User Recertification.                                                                                                     | The Agency Administrator Recertification will not be implemented at this time.                                                                                                                          |
| HMIS User Requirements | The recertification should focus on updates or trending items instead of repeating the same skills test.                                                                                                                                               | The HMIS Lead will remove the Recertification Skills Test requirement and instead create a course that focuses on critical updates and recurring issues, including privacy, security, and data quality. |
| HMIS User Requirements | System use varies by role, so some components of the skills test don't apply to all users.                                                                                                                                                             | The HMIS Lead will remove the Recertification Skills Test requirement and instead create a course that focuses on critical updates and recurring issues, including privacy, security, and data quality. |

#### LEAC Feedback: October 2026

No additional feedback provided

#### Policies, Procedures, and Standards Committee (PPS) Feedback: October 2026

| Section                           | Feedback                                                                                                              | Response                                                                                                                                                                                                |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Agency Administrator Requirements | Two business days is a short amount of time for an agency to notify the HMIS Lead that a user's access to HMIS should | In most cases, a user's access to HMIS is revoked because they have left the agency. Because of the sensitive nature of HMIS data, it is best practice to revoke the user's access as soon as possible. |

### Item 3. Attachment B.

As submitted by Orange County United Way's 2-1-1 Orange County (211OC)

|                        |                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                        | be revoked. Five to seven business days is more reasonable.                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                     |
| Privacy                | Add some method of ensuring that clients are aware that signing the consent form means their data will be shared with other agencies in HMIS and included in data requests. | A section has been added to the Consent to Share Protected Personal Information Form for clients to confirm their understanding that by signing the form their record will be shared with other HMIS participating agencies and included in data requests approved by the CoC Board.                                                                                                                |
| Client Record Requests | Why was the change made to allow clients to request their records from the HMIS Lead directly?                                                                              | Many clients are already contacting the HMIS Lead because they are not on good terms with the agency that was working with them. The proposed revisions to the policy are intended to streamline the process for both the clients and the HMIS Lead.                                                                                                                                                |
| Client Record Requests | Clients should be given full access to their case notes without redactions.                                                                                                 | Case notes are released at the discretion of the agency that entered them. The agency must consider the contents of the case notes and their own liability insurance prior to releasing case notes. The updated policy requires agencies to redact third-party information from case notes, like names of other clients, staff, or agency names, in order to protect the confidentiality of others. |
| Data Release           | After a data request has been approved, the requestor should be required to sign an MOU regarding data use, security, and disposal.                                         | The HMIS Lead is considering the development of a MOU for data requests that include client-level information.                                                                                                                                                                                                                                                                                      |
| Data Release           | Regarding the new language that requests must have a local stakeholder, does that mean requests outside of Orange County will no longer be allowed?                         | Not necessarily. The purpose of the language is to ensure that data requests are useful and beneficial to the CoC. Results from data requests should be considered by the CoC Board and changes implemented as needed. A CoC Board member may volunteer to be the local stakeholder if they believe a data request would be a benefit to the CoC.                                                   |
| HMIS User Requirements | The annual recertifications are cumbersome for users to complete, and are not required by HUD.                                                                              | Future annual recertifications will be limited to topics that are critical for users, like data quality, performance, privacy, security, and client rights. Quality data is a high priority for the CoC, and required annual recertifications ensure that users receive information that they may not otherwise get from optional trainings or meetings.                                            |

# 2026 Review

## Orange County HMIS Policies and Procedures

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~~MAY 2025~~ OCTOBER 2026

Orange County United Way/2-1-1 Orange County  
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### Item 3. Attachment C.

#### Orange County HMIS Policies and Procedures

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#### Orange County HMIS Policies and Procedures

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## Orange County HMIS Policies and Procedures

### Key Terms and Acronyms

All documents referenced in the HMIS Policies and Procedures can be found on the [HMIS Documents](#) page of the OC HMIS ~~Information~~-website unless otherwise noted.

| Term                                         | Acronym (if applicable) | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Orange County United Way/2-1-1 Orange County | OCUW/211OC              | HMIS Lead Agency for Orange County CoC                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Agency Administrator                         | AA                      | The HMIS User designated by their agency to serve as Agency Administrator is responsible for training new HMIS Users and overseeing data quality management, among other duties described in the Policies and Procedures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Agency Agreement                             |                         | The <a href="#">annual</a> agreement form between Orange County HMIS participating agencies and the HMIS Lead Agency that specifies the rights and responsibilities of each party regarding the use of HMIS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Aggregate Data                               |                         | Data that has been collected from different clients and compiled into sums. Aggregate data does not include any information that could identify a particular client.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Annual Homeless Assessment Report            | AHAR                    | The AHAR is a national-level report that provides information about homeless service providers, people and households experiencing homelessness, and various characteristics of that population. It informs strategic planning for federal, state, and local initiatives designed to prevent and end homelessness. The AHAR is submitted to Congress on an annual basis.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Chronically Homeless                         | CH                      | <p>In order to be eligible for housing restricted to chronically homeless individuals or families under the CoC program, participants must meet the definition of chronically homeless. The definition of chronically homeless is:</p> <ul style="list-style-type: none"><li>• A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who:<ul style="list-style-type: none"><li>○ Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and</li><li>○ Has been homeless and living as described for at least 12 months* or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described.</li></ul></li><li>• An individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility**; or</li><li>• A family with an adult head of household (or, if there is no adult in the family, a minor head of household) who meets all of the criteria of this definition, including a family whose</li></ul> |

### Item 3. Attachment C.

#### Orange County HMIS Policies and Procedures

|                                           |                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------|-----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                           |                             | composition has fluctuated while the head of household has been homeless.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Client Identifying Information            | CII                         | <p>Client Identifying Information, also known as Personal Protected Information (PPI), is a category of sensitive information that is associated with an individual person. This information should be accessed only on a strict need-to-know basis, <u>and should be</u> handled and stored with care. <u>This category includes but is not limited to: Client Identifying Information includes</u> First names, last names, dates of birth, and Social Security Numbers, <u>but it can also include any other information that can be used to identify a client, like case notes, mailing addresses, or email addresses.</u></p> <p><u>Please refer the additional document available in the Adding Client Profiles to HMIS Knowledge Base article.</u></p> |
| Continuum of Care                         | CoC                         | The Continuum of Care is a collection of nonprofits, agencies, and people with lived experience of homelessness that come together to promote community wide commitment to the goal of ending homelessness; promote access to and affect utilization of mainstream programs by individuals and families experiencing homelessness; and optimize self-sufficiency among individuals and families experiencing homelessness.                                                                                                                                                                                                                                                                                                                                    |
| Continuum of Care Board                   | CoC Board                   | The Continuum of Care Board is the governing body for the Orange County CoC. They are committed to the goal of ending homelessness and are organized to carry out the responsibilities required under the CoC Program regulations, 24 CFR Part 578.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Continuum of Care Collaborative Applicant | CoC Collaborative Applicant | The Orange County CoC designated the County of Orange as the Collaborative Applicant. The CoC Collaborative Applicant is tasked with coordinating the development of the CoC system, its planning, and supporting the various functions and activities as required by the HEARTH Act.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Continuum of Care Program                 | CoC Program                 | The CoC Program is designed to assist individuals (including unaccompanied youth) and families experiencing homelessness and to provide the services needed to help such individuals move into transitional and permanent housing, with the goal of long-term stability. More broadly, the program is designed to promote community-wide planning and strategic use of resources to address homelessness; improve coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness; improve data collection and performance measurement; and allow each community to tailor its program to the particular strengths and challenges within that community.                                               |
| Coordinated Entry System                  | CES                         | A project that administers the CoC's centralized or coordinated process to coordinate assessment and referral of individuals and families seeking housing or services, including the use of a comprehensive and standardized assessment tool.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Coordinated Entry System Lead             | CES Lead                    | The CES Lead is empowered by the CoC to manage the process of determining and updating the prioritization for all housing resources that participate in the Coordinated Entry System.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

### Item 3. Attachment C.

#### Orange County HMIS Policies and Procedures

|                                         |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Coverage Rate                           |          | Coverage rate refers to the percentage of beds targeted to serve people experiencing homelessness in a geographic area that are captured in the HMIS divided by the total number of beds targeted to serve people experiencing homelessness in the geographic area (excluding beds targeted to serve domestic violence clients). Coverage rate estimates are used to project a total homeless count if there are homeless service providers in the jurisdiction that do not participate in HMIS.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Day Shelter                             | DS       | A project that offers daytime facilities and services (no overnight lodging) for persons who are experiencing homelessness.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Department of Health and Human Services | HHS      | The U.S. Department of Health and Human Services (HHS), also known as the Health Department, is a cabinet-level department of the U.S. Federal government. The Health Department's goal is to protect the health of all Americans and provide essential human services.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Emergency Shelter – Entry Exit          | ES - EE  | A project that offers temporary shelter (lodging) for people experiencing homelessness in general or for specific populations of people experiencing homelessness. Requirements and limitations may vary by program and will be specified by the funder. This project type should be used for all shelters that collect Universal Data Elements and certain Program-Specific Data Elements at project start and project exit, including projects that require or strongly encourage a continuous stay while a client resolves their experience of homelessness. In these shelters, length of stay is calculated based on the number of nights between project start and project exit, and performance measures will include changes from project start and project exit Data Collection Stages.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Emergency Shelter – Night-by-Night      | ES - NbN | This project type may be used by some high-volume shelters and shelters where a significant proportion of clients spend a night at the shelter as needed on an irregular basis. This project type relies on creating a separate record of each individual date on which a client is present in the shelter as a means for calculating length of stay and implies that the emergency shelter is generally unable to collect as much client data at project exit as ES – EE shelters for tracking utilization. In ES - NbN shelter: (1) entry information is collected the first time that a client stays at the shelter (2) the project records every discrete date (or series of dates) that the client resides in the shelter; (3) the HMIS maintains historical data on the nights a client is sheltered; (4) the client may be exited when shelter staff has information that indicates that the client is unlikely to return to the shelter or the system may be designed to automatically generate an exit (dating back to the day after the last bed night) after an extended absence; and (5) for reporting purposes, a client's length of stay in the project will be based on the actual number of bed nights and not on the period of time from entry to exit. |
| Emergency Solutions Grants Program      | ESG      | The ESG program provides funding to: <ul style="list-style-type: none"> <li>• Engage individuals and families experiencing homelessness who are living on the street;</li> <li>• Improve the number and quality of emergency shelters for individuals and families experiencing homelessness;</li> <li>• Help operate these shelters;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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|                                                             |       | <ul style="list-style-type: none"> <li>• Provide essential services to shelter residents;</li> <li>• Rapidly re-house individuals and families experiencing homelessness; and</li> <li>• Prevent families and individuals from becoming homeless.</li> </ul>                                                                                                                                                                                                                                                                            |
| Health Insurance Portability and Accountability Act of 1996 | HIPAA | The Health Insurance Portability and Accountability Act of 1996, particularly the Privacy Rule under Title II, regulates the use and disclosure of Protected Health Information held by covered entities and business associates. HIPAA is the base operational privacy rule on which the Orange County HMIS Privacy Notice is structured.                                                                                                                                                                                              |
| HMIS Lead Agency                                            |       | The HMIS Lead Agency is an agency, organization, or government department designated by the CoC Board to administer and manage the HMIS for the CoC jurisdiction.                                                                                                                                                                                                                                                                                                                                                                       |
| Homeless Management Information System                      | HMIS  | A data system that meets HUD's requirements and is used to collect client-level data and data on the provision of housing and services to individuals and families experiencing homelessness and persons at risk of homelessness. The HMIS is also the primary reporting tool for HUD homeless service grants as well as for other Federal, State and local government streams of funding related to homelessness. HMIS data is used to better inform homeless policy and analyze program and system impact in addressing homelessness. |
| Homelessness Prevention                                     | HP    | A project that offers supportive services and/or financial assistance necessary to prevent individuals and families from experiencing homelessness, including moving into an emergency shelter or place not meant for human habitation.                                                                                                                                                                                                                                                                                                 |
| Housing Inventory Count                                     | HIC   | The HIC is a point-in-time inventory of housing programs within a CoC that provide beds and units dedicated to serve people experiencing homelessness (or for permanent housing projects, were experiencing homelessness at entry). The project types included in the HIC are Emergency Shelter, Transitional Housing, Rapid Re-housing, Safe Haven, and Permanent Supportive Housing. HUD requires the submission of the HIC on an annual basis.                                                                                       |
| Housing Opportunities for Persons with AIDS Program         | HOPWA | HOPWA provides housing assistance and related supportive services for persons with HIV/AIDS, and family members who are experiencing homelessness or are at risk of homelessness. This project has different project reporting requirements than the other HUD funded projects described in the Policies and Procedures.                                                                                                                                                                                                                |
| Interagency Data Sharing Consent Form                       |       | Allows client-level data and enrollment data to be shared among OC HMIS Participating Agencies. HOPWA funded projects are exempt from the data sharing mandate due to privacy laws protecting clients' HIV status.                                                                                                                                                                                                                                                                                                                      |
| Length of Stay                                              | LOS   | The number of days between the beginning of services and the end of services. It is calculated using entry and exit dates or shelter stay dates, depending on the project's method of tracking bed nights.                                                                                                                                                                                                                                                                                                                              |

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| Lived Experience Advisory Committee                               | LEAC | This Committee was created to obtain and include community-level feedback from persons with current and past lived experience of homelessness in the CoC's efforts to end homelessness in Orange County. This includes providing input on policies, procedures, and standards development and improving the quality and types of services provided to people experiencing homelessness.                                                                                                                                                                                                                                    |
| Longitudinal Systems Analysis                                     | LSA  | The LSA is a report submitted by each CoC on an annual basis to HUD, and includes demographic, performance, and household composition information, as well as patterns of system use. The LSA from each CoC is consolidated to create the AHAR that is submitted to Congress.                                                                                                                                                                                                                                                                                                                                              |
| Other (project type)                                              |      | A project that offers services, but does not provide lodging, and cannot otherwise be categorized as another project type, per above. Any project that provides only stand-alone supportive services (other than outreach) and has no associated housing outcomes should be categorized as 'Other.' For example, a project funded to provide childcare for persons in permanent housing or a dental care project funded to serve people experiencing homelessness should be designated 'Other.' A project funded to provide ongoing case management with associated housing outcomes should be designated 'Services Only.' |
| Participating Agencies                                            |      | Agencies, organizations or local government departments that actively participate in HMIS through input of client-level data and project information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| PH - Housing Only                                                 | OPH  | A project that offers permanent housing for persons who are experiencing homelessness, but does not make supportive services available as part of the project.                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| PH – Housing with Services (no disability required for entry)     | OPH  | A project that offers permanent housing and supportive services to assist people experiencing homelessness to live independently, but does not limit eligibility to individuals with disabilities or families in which one adult or child has a disability.                                                                                                                                                                                                                                                                                                                                                                |
| PH - Permanent Supportive Housing (disability required for entry) | PSH  | A project that offers permanent housing and supportive services to assist chronic homeless persons with a disability (individuals with disabilities or families in which one adult or child has a disability) to live independently.                                                                                                                                                                                                                                                                                                                                                                                       |
| PH - Rapid Re-Housing                                             | RRH  | A permanent housing project that provides housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help individuals or families experiencing homelessness to move as quickly as possible into permanent housing and achieve stability in that housing.                                                                                                                                                                                                                                                                                                                |
| PH - Rapid Re-Housing Subtypes                                    |      | RRH: Services Only - A RRH project that provides services only and does not provide ongoing rental assistance or support any inventory for participants.<br><br>RRH: Housing with or without services - A RRH project that offers ongoing rental assistance that may or may not be accompanied by financial or other supportive services to participants.                                                                                                                                                                                                                                                                  |

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| Point in Time Count                              | PIT                   | A point-in-time count is an unduplicated count on a single night during the last ten days of January of the people in a community who are experiencing homelessness that includes both sheltered and unsheltered populations. An annual sheltered PIT count is conducted using HMIS data and other sources. A biannual unsheltered PIT is conducted every two years.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Policies, Procedures, and Standards Committee    | PPS Committee         | The PPS Committee will function as an advisory group to the CoC Board. This committee aligns with the intent of ensuring that the CoC has clearly documented policies and standards for process review, policy formation, assessment of current policies and procedures and formation and conduct of committees in the service of the CoC, CES, and HMIS. The PPS Committee will support with creating a clear structure for policy development and subsequent revisions, monitoring and vetting work done through committees, work groups and ad hoc groups will create efficiencies and improve the amount of work that the CoC Board can accomplish.                                                                                                                                                                                                                                                                                                                                  |
| <a href="#">Program-Specific Data Elements</a>   | <a href="#">PSDEs</a> | <p><a href="#">To meet the statutory and regulatory requirements of federally funded programs using HMIS, additional elements are required for different funding sources. The Program Specific Data Elements are elements that are required by at least one of the HMIS Federal Partner programs.</a></p> <p><a href="#">Some of the program specific data elements are collected across most Federal Partner programs. These are called "Common" Program Specific Data Elements.</a></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <a href="#">Project Descriptor Data Elements</a> | <a href="#">PDDEs</a> | <p><a href="#">Project descriptor data elements (PDDEs) are intended to identify the organization, specific project, and project details to which an individual client record is associated in an HMIS.</a></p> <p><a href="#">PDDEs enable the HMIS to:</a></p> <ul style="list-style-type: none"> <li><a href="#">Associate client-level records with the various projects that the client will enroll in across continuum projects.</a></li> <li><a href="#">Clearly define the type of project the client is associated with the entire time they receive housing or services.</a></li> <li><a href="#">Identify which federal partner programs are providing funding to the project.</a></li> <li><a href="#">Track bed and unit inventory and other information by project, which is relevant for the Longitudinal Systems Analysis (LSA), System Performance Measures (SPM), Housing Inventory Counts (HIC), Point-in-Time (PIT) counts, and utilization analysis.</a></li> </ul> |

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| Project Types                                           |                                       | <p>A project is to be assigned a 'Project Type' based on the lodging or service it is providing. The project type selected directly impacts data collection and reporting requirements. The U.S. Department of Housing and Urban Development defines these Project Types in HMIS:</p> <ul style="list-style-type: none"> <li>• Homelessness Prevention</li> <li>• Street Outreach</li> <li>• Emergency Shelter - Entry Exit</li> <li>• Emergency Shelter - Night-by-Night</li> <li>• Day Shelter</li> <li>• Transitional Housing</li> <li>• Safe Haven</li> <li>• PH - Rapid Re-Housing</li> <li>• PH - Permanent Supportive Housing (disability required for entry)</li> <li>• PH – Housing with Services (no disability required for entry)</li> <li>• PH - Housing Only</li> <li>• Coordinated Entry</li> <li>• Services Only</li> <li>• Other</li> </ul> |
| Projects for Assistance in Transition from Homelessness | PATH                                  | PATH is funded by the Substance Abuse and Mental Health Services Administration (SAMHSA). It provides services to people experiencing homelessness who are also experiencing mental illness, primarily through street outreach, to link them to permanent community housing. This project has different reporting requirements than HUD funded projects and uses HMIS to collect this information.                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Rapid Re-Housing: Services Only                         | RRH: Services Only                    | A type of Rapid Re-Housing project that provides services only and does not provide ongoing rental assistance or support any inventory for participants.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Rapid Re-Housing: Housing with or without services      | RRH: Housing with or without services | A type of Rapid Re-Housing project that offers ongoing rental assistance that may or may not be accompanied by financial or other supportive services to participants.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Runaway Homeless Youth program                          | RHY                                   | The RHY program supports street outreach, emergency shelters and longer-term transitional living and maternity group home programs to serve youth experiencing homelessness (up to age 25). The program is managed by the Family and Youth Services Bureau (FYSB).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Safe Haven                                              | SH                                    | A project that offers supportive housing that (1) serves hard to reach people experiencing homelessness with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services; (2) provides 24-hour residence for eligible persons for an unspecified period; (3) has an overnight capacity limited to 25 or fewer persons; and (4) provides low demand services and referrals for the residents.                                                                                                                                                                                                                                                                                                                                                                                                     |

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| Services Only                                    | SSO                  | A project that offers only stand-alone supportive services (other than outreach) to address the special needs of participants (such as childcare, employment assistance, and transportation services) and has associated housing outcomes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Street Outreach                                  | SO                   | A project that offers services necessary to reach out to people experiencing unsheltered homelessness, connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care to people experiencing unsheltered homelessness who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Only persons who are “street homeless” should be entered into a street outreach project. Projects that also serve persons other than “street homeless” must have two separate projects <del>to be</del> set up in an HMIS – one ‘Street Outreach’ and the other ‘Services Only.’                                                                                                                                    |
| Supportive Services for Veteran Families Program | SSVF                 | SSVF is a program overseen by the VA, and the purpose is to provide supportive services grants to private non-profit organizations and consumer cooperatives who will coordinate or provide supportive services to very low-income veteran families who are residing in permanent housing, are experiencing homelessness and scheduled to become residents of permanent housing within a specified time period, or after exiting permanent housing, are seeking other housing that is responsive to such very low-income veteran family’s needs and preferences.                                                                                                                                                                                                                                |
| System Performance Measures Report               | SPM                  | The HUD System Performance Measures Report measures the performance of a CoC as a whole as mandated by the 2009 HEARTH Act. The report analyzes the performance of Safe Haven, Street Outreach, Emergency Shelter, Transitional Housing, and Permanent Housing (including Permanent Supportive Housing, Rapid Re-Housing, and Other Permanent Housing) project types in the Orange County CoC that participate in HMIS.                                                                                                                                                                                                                                                                                                                                                                         |
| Transitional Housing                             | TH                   | A project that provides temporary lodging and is designed to facilitate the movement of individuals and families experiencing homelessness into permanent housing within a specified period of time, but no longer than 24 months. Requirements and limitations may vary by program and may be specified by the funder.                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <a href="#">Universal Data Elements</a>          | <a href="#">UDEs</a> | <p><a href="#">HMIS Universal Data Elements are elements required to be collected by all projects participating in HMIS, regardless of funding source. Projects funded by any one or more of the federal partners must collect the Universal Data Elements (UDEs), as do projects that are not funded by any federal partner (e.g., missions) but have agreed to enter data as part of the CoC’s HMIS implementation.</a></p> <p><a href="#">The UDEs 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 homelessness, and patterns of service use, including information on shelter stays and homelessness over time.</a></p> |
| U.S. Department of Housing and Urban Development | HUD                  | HUD is a Cabinet department in the Executive branch of the U.S. Federal government. HUD provides funding to CoCs across the country serving people experiencing homelessness.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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| U.S. Department of Veterans Affairs | VA   | The U.S. Department of Veterans Affairs provides patient care and federal benefits to veterans and their dependents.                                                                                                                                                                                                                                    |
| User Agreement                      |      | The agreement form between individual users and the HMIS Lead Agency that outlines a user's responsibilities when using HMIS. Individual users are staff or volunteers that have access to HMIS on behalf of agencies participating in HMIS. This form is signed on the user's first log-in to HMIS, and again every year the user's account is active. |
| Veteran Affairs Supportive Housing  | VASH | The VASH program combines Housing Choice Voucher (HCV) rental assistance for Veterans experiencing homelessness with case management and clinical services provided by the VA. The VA provides these services for participating Veterans at VA Medical <del>V</del> Centers (VAMCs) and community-based outreach clinics.                               |

### Orange County United Way: HMIS Lead Agency

The Orange County CoC has designated Orange County United Way as the Lead Agency. Orange County United Way's key service, 2-1-1 Orange County (211OC), connects thousands of Orange County (OC) residents with health and human service resources, and administers HMIS for the Orange County CoC. As such, 211OC is tasked with assisting the Orange County CoC with:

- Developing and implementing ~~a~~-privacy~~-plan~~, security ~~plan~~ and data quality plan~~s~~ for the Orange County CoC's HMIS
- Ensuring consistent participation of State, Federal and local government funded recipients and sub recipients in HMIS
- Ensuring HMIS is administered in compliance with requirements prescribed by the U.S. Department of Housing and Urban Development (HUD)
- Ensuring the HMIS operates efficiently and effectively to promote agency participation and system coordination
- Providing system, agency, and project-level analysis of utilization and performance across the CoC

#### HMIS Lead Agency Contact Information:

|                             |                                                                                           |
|-----------------------------|-------------------------------------------------------------------------------------------|
| OC HMIS Information Website | <a href="http://ochmis.org/">http://ochmis.org/</a>                                       |
| OC HMIS Training Website    | <a href="http://training.ochmis.org/">http://training.ochmis.org/</a>                     |
| OC HMIS Login               | <a href="https://oc.clarityhs.com/login">https://oc.clarityhs.com/login</a>               |
| HMIS Helpdesk               | <a href="http://ochmis-211oc.happyfox.com/home">http://ochmis-211oc.happyfox.com/home</a> |

## I. Background & Purpose

The Homeless Management Information System (HMIS) is the electronic data collection system utilized by the Orange County Continuum of Care (CoC) to comply with the responsibilities outlined in 24 CFR 578.7(b) for designing and operating an HMIS. HMIS is the local information technology system ~~requirements~~ that ~~the~~ U.S. Department of Housing and Urban Development (HUD) funding recipients and subrecipients use for homeless assistance programs as authorized by the McKinney-Vento Homeless Assistance Act. The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act

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codifies in law certain data collection requirements integral to HMIS. The HEARTH Act requires that HUD ensure operation of and consistent participation by recipients and sub-recipients in an HMIS compliant software. [—Current HMIS standards](#) are included in the 2004 Technical Standards and the [2010-FY2026 Data Standards](#).

HUD and other planners and policymakers use aggregate HMIS data to better inform homeless policy and decision making at the federal, state and local government levels. HMIS enables HUD to collect aggregate data at the national-level on the extent and nature of homelessness over time. Specifically, an HMIS can be used to produce an unduplicated count of people experiencing homelessness, understand patterns of service use, and measure the effectiveness of homeless programs. Data on people experiencing homelessness is collected and maintained at the local level. HMIS implementations can encompass geographic areas ranging from a single city to an entire state.

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act also requires that all communities have an HMIS with the capacity to collect unduplicated counts of individuals and families experiencing homelessness. Through HMIS, the CoC should be able to collect information from projects serving individuals and families experiencing homelessness to use as part of their needs analyses and to establish funding priorities. The HEARTH Act also codified into law certain data collection requirements integral to HMIS. With enactment of the HEARTH Act, HMIS participation became a statutory requirement for recipients and subrecipients of CoC Program and Emergency Solutions Grants (ESG) funds.

HMIS can be used to:

- Produce an unduplicated count of persons experiencing homelessness for each CoC
- Describe the extent and nature of homelessness locally, regionally, and nationally
- Identify patterns of service use
- Measure program effectiveness

The ensuing set of HMIS Policies and Procedures documents the Orange County CoC's operation of its HMIS and acts as a guide to its continuing operation in compliance with the CoC and ESG Regulations and Interim Rules. The HMIS Policies and Procedures have been developed to further the following HMIS Goals:

- Assist in facilitating the coordination of care for people experiencing homelessness and at risk of homelessness populations.
- Ensure accurate data about the nature of homeless services and clients in the Orange County CoC.
- Ensure accurate data about the nature and extent of prevention and diversion services provided to households at risk of homelessness in the Orange County CoC.
- Collect data that fulfills federal, state and local requirements for homeless reporting and inform system gaps and resource development

## II. Policies and Procedures Summary

This document serves as the minimum standards of participation in the Orange County HMIS and represents general best practices. Operational standards in this document are not intended to supersede grant specific requirements and operating procedures as required by funding entities. PATH, HOPWA, and VA providers have operating rules specific to the U.S. Departments of Health and Human Services (HHS) and VA.

The HMIS Lead Agency will update this document at any time when necessary due to HUD or local CoC changes. [The latest versions of the HUD HMIS Data Standards Manual and Data Dictionary](#) are the basis for all programming specifications and requirements of HMIS. Updates will be brought to the Lived Experience Advisory Committee (LEAC), Policies, Procedures and Standards Committee (PPS), and the CoC Board for approval. Upon approval, updates to this document will be announced to all Agency Administrators via email and posted on the OC HMIS website. The most recently approved version of this document is the only version that is considered valid and supersedes all previous versions.

## III. HMIS Lead Agency Responsibilities

- a. Provide HMIS User training as needed.
- b. Develop and maintain training materials related to HMIS functionality, privacy and security, and reporting functionality.
- c. Develop and maintain all HMIS related forms, including client forms and privacy forms.
- d. Create HMIS User accounts and control access to HMIS.
- e. Communicate all system-wide changes to Agency Administrators via direct emails, announcements on the OC HMIS website, and/or User Meetings.
- f. Resolve HMIS-related grievances that cannot be resolved by the agency working with the client.
- g. Host HMIS User Meetings open to all HMIS Users to discuss the use and implementation of HMIS.
- h. Host the Data and Performance Management meetings, which are open to all HMIS users, and focus on performance and policies related to HMIS.
- i. Provide technical support to Agency Administrators via the HMIS Help Desk.
- j. Serve as intermediary between Participating Agencies and the HMIS vendor.
- k. Alert the HMIS vendor to all HUD deadlines for data standards changes, required reporting specifications, etc.
- l. Complete HMIS software testing, as needed.
- m. Submit tickets for technical support to the HMIS vendor on behalf of Participating Agencies when HMIS Lead Agency is not able to resolve a technical issue.
- n. Monitor the availability of HMIS to HMIS Users, and inform all users of any planned or unplanned service outages via direct email or announcement on the OC HMIS website.
- o. Facilitate access to system level data.
- p. Establish HMIS participation fees based on appropriate criteria in collaboration with the CoC Collaborative Applicant and as approved by the CoC Board.
- q. Serve as Lead for all HUD-required reporting involving HMIS data (HIC and Sheltered PIT, System Performance Measures, Longitudinal Systems Analysis, etc.).
- r. Publish system, agency, and project level reports from HMIS as needed.

## IV. Help Desk

- a. HMIS Help Desk hours are Monday through Friday from 9AM to 5PM, excluding holidays. Please review the OC HMIS calendar for details regarding holidays and HMIS Helpdesk closure days.
- b. Only designated Agency Administrators may submit requests for technical support to the HMIS Help Desk. Run the Agency Active Users report in HMIS to view active Agency Administrators. The methods of contacting the HMIS Help Desk are below. Agency Administrators should not directly contact individual members of the HMIS team.
  - a. HMIS Help Desk phone number 714-589-2360
  - b. HMIS Help Desk website <http://ochmis-211oc.happyfox.com/home>
- c. HMIS Staff strives to answer all technical support tickets within three (3) business days, but workload, holidays and number of available staff may delay response. Agency Administrators are responsible for raising technical issues in a timely manner, keeping in mind that their request may not be solved same day.
  - ~~a. HMIS Staff will provide a weekly updates for tickets until the ticket is resolved that may take longer than 3 business days to resolved.~~ Some examples of tickets that may take additional time: solutions requiring coordination between partner agencies related to HMIS data, system error tickets escalated to the HMIS vendor, or tickets pending additional guidance from outside entities, like the OC Collaborative Applicant, the CES Administrator, or the CoC Lead or federal or state technical assistance departments.
- d. Client identifying information should never be sent to the HMIS Help Desk. This includes but is not limited to: First Names, Last Names, Dates of Birth, or Social Security Numbers. If ~~you a specific client or screen needs to be referenced, send need to discuss a specific client only~~ the client's HMIS unique ID or a web link of the screen where the error is occurring should be sent. ~~Agency Administrators who repeatedly submit client identifying information to the HMIS Help Desk may be subject to corrective action. Any client identifying data sent to the HMIS Help Desk will be treated as a data breach, and will follow the procedure outlined later in this document.~~
  - ~~First occurrence: The HMIS Team will send a written reminder explaining what information can and cannot be shared with the Help Desk. The Agency Administrator will complete the HMIS Privacy training. The incident is noted, and the Agency Administrator confirms understanding.~~
  - ~~Second occurrence: The HMIS Team will send a formal warning to the agency's Executive Director. The Agency Administrator must complete the HMIS Privacy training and sign acknowledgement.~~
  - ~~Third occurrence: The Agency Administrator's HMIS access is temporarily paused and an additional meeting with agency's leadership will be scheduled. The Back Up Agency Administrator will take on the full HMIS responsibilities for their agency. If a Back Up Agency Administrator is not yet designated, the Executive Director will assign a staff.~~
    - ~~The Agency Administrator will the paused account will take additional training and complete a compliance plan to regain access to HMIS.~~
  - ~~Forth occurrence: If the problems persist, HMIS access may be removed from the Agency Administrator. The agency will need to assign a new administrator and show steps they've taken to prevent this from happening again.~~

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~~The Back Up Agency Administrator will take on the full HMIS responsibilities for their agency as the Primary Agency Administrator. A new Back Up Agency Administrator will be assigned.~~

#### VI.V. Agency Access

- a. In order to be granted HMIS Access, an organization must be able to meaningfully contribute client, service, and housing data as appropriate for individuals and families who are experiencing ~~homelessness~~ or at-risk of homelessness. Organizations are not limited to non-profit service providers, and may include faith-based or community organizations, as well as any other organization that meets the criteria in this section. The organization must contribute data for at least one of the Project Types included in the latest published HMIS Data Standards Manual.
- b. An organization that at minimum meets one of the following criteria will be granted access to HMIS:
  - a. Manage at least one homeless assistance housing project, including Emergency Shelter, Transitional Housing, and Permanent Housing projects, that will be contributing data to HMIS. Adding these project types to HMIS will increase the CoC's bed coverage which is a priority for the CoC.
  - b. Receive ~~federal and/or state~~ funding for the implementation and operations of a homeless assistance project and/or homelessness prevention project that requires HMIS participation.
    - i. Organizations receiving funding that requires HMIS participation will be given data entry access, but this does not necessarily include data sharing with other Participating Agencies. Law enforcement agencies and legal service providers receiving funding that requires HMIS participation will be given data entry access only.
    - ii. Victim Service Providers and legal service providers that are recipients of funds requiring participation in HMIS, but do not directly enter data into an HMIS, must use a comparable database. A comparable database complies with all HMIS data, technical and security standards, and allows the collection of the aggregate data needed for reporting while respecting the sensitive nature of the client-level information.
    - iii. Victim Service Providers receiving CoC Program funds or ESG Program funds may request up to five licenses for read-only access in HMIS for the purpose of care coordination. The Victim Service Provider will be required to pay the User Fee for 1 – 5 users as outlined in the Participating Agency Requirements section.
- c. Organizations that do not meet the above listed criteria will be required to complete the HMIS 101 online course and submit an HMIS Access Application for review and consideration by the HMIS Access Working Group as appointed by the Orange County CoC to further evaluate the request. Membership, qualifications, and recruitment process for the Agency Access Working Group are outlined in the next section.

~~a. The HMIS Access Working Group will be comprised of three to five CoC General members. Membership to the HMIS Access Working Group is recommended by the current HMIS Access Working Group members, the CoC Collaborative Applicant and the HMIS Lead~~

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~~Agency, and the CoC Board approves the appointments. The HMIS Access Working Group will meet monthly or on an as-needed basis for the purposes of evaluating HMIS Access Applications.~~

~~a. When vacancies occur, the CoC Collaborative Applicant will send an email via the CoC distribution list notifying CoC General Membership of vacancies in the HMIS Access Working Group and soliciting interested participants. Additionally, as needed, the HMIS Access Working Group, CoC Collaborative Applicant and the HMIS Lead Agency will outreach to qualified CoC General Members individually to solicit interested participants. The CoC Collaborative Applicant will confirm interest from CoC General Members to be considered for the HMIS Access Working Group. The HMIS Access Working Group, the CoC Collaborative Applicant and the HMIS Lead Agency will then review all interested candidates to select the most qualified member(s) for the working group to be recommended to the CoC Board for appointment.~~

~~i. Qualifications:~~

~~0.1. Individual must belong to an agency that is an Orange County CoC General Member or be an Individual General Member~~

~~0.1. At least two (2) years of experience with HMIS preferred~~

~~0.1. At least two (2) years of experience with the Orange County CoC preferred~~

~~0.1. Works collaboratively with others and can provide constructive feedback~~

~~0.1. Ability to make informed decisions based on objective analysis of available information~~

~~0.1. Desire to positively impact the Orange County CoC~~

~~0.1. Understanding of the Orange County CoC's responsibility of promoting access and effective utilization of mainstream programs~~

~~0.1. Have the availability to commit to serve a minimum term of one year~~

~~e.d.~~ The HMIS Access Application requires organizations to detail how their organization's participation in HMIS will ~~be able to~~ meaningfully contribute information related to homeless assistance projects or homelessness prevention projects to the Orange County CoC, and how the HMIS access will improve the provision of homeless services in the Orange County CoC. The HMIS Access Application will also assist the HMIS Access Working Group to evaluate the organization's HMIS Data Sharing capabilities. The Agency Access Working Group may deny access to HMIS if the organization's activities are not aligned with housing stability or service provision. Reasons for denial may include but are not limited to: the organization does not have an established history of service delivery or outreach, service delivery is inconsistent or sporadic, or the organization doesn't have the capacity to participate fully in HMIS.

~~e.e.~~ Organizations that meet the requirements for HMIS Access must be in compliance with all other aspects of the HMIS Policies and Procedures, including the HMIS Participating Agency Agreement and the Data Sharing Agreement.

~~e.f.~~ Agencies approved for HMIS access must begin entering data into HMIS within 90 days of approval. After this time the agency's approval will expire and the agency will need to resubmit their application to gain HMIS access.

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~~f.g.~~ Agencies that are denied access to HMIS by the HMIS Access Working Group may request an appeal. The purpose of the appeal is to ensure the integrity of the review process for the agency's application. Appeals must be submitted to the HMIS Help Desk.

- a. Upon receipt of the appeal, the HMIS Lead Agency will complete the Agency Access Process Review, and determine whether the process was followed appropriately. If all steps of the review process were followed, the decision by the Agency Access Working Group stands. If all steps in the review process were not followed, a sub-set of the Policies, Procedures, and Standards Committee will provide a secondary review and make a final determination regarding the agency's application. This decision cannot be appealed, but agencies denied access to HMIS may re-apply in the future if they can effectively address the reasons their initial application was denied.

~~s.h.~~ The HMIS Access Working Group and the HMIS Lead Agency reserve the right to remove HMIS Access if HMIS is not being used to improve service provision for clients or contributing meaningful data to the Orange County CoC.

- a. Examples of unacceptable uses of HMIS include but are not limited to:
  - i. Using HMIS data to monitor the whereabouts or service utilization of participants for purposes outside of housing-focused case management
  - ii. Using HMIS data outside of a business need
  - iii. Using data in HMIS as a reason to not serve a client that is not related to eligibility criteria (ie. substance use history, mental health issues, etc.)
  - iv. Sharing client identifying data with persons or groups that don't have access [to](#) HMIS

## VI. Agency Access Working Group

a. The HMIS Access Working Group will be comprised of three to five CoC General members. Membership to the HMIS Access Working Group is recommended by the current HMIS Access Working Group members, the CoC Collaborative Applicant and the HMIS Lead Agency, and the CoC Board approves the appointments. The HMIS Access Working Group will meet monthly or on an as-needed basis for the purposes of evaluating HMIS Access Applications.

a. When vacancies occur, the CoC Collaborative Applicant will send an email via the CoC distribution list notifying CoC General Membership of vacancies in the HMIS Access Working Group and soliciting interested participants. Additionally, as needed, the HMIS Access Working Group, CoC Collaborative Applicant and the HMIS Lead Agency will outreach to qualified CoC General Members individually to solicit interested participants. The CoC Collaborative Applicant will confirm interest from CoC General Members to be considered for the HMIS Access Working Group. The HMIS Access Working Group, the CoC Collaborative Applicant and the HMIS Lead Agency will then review all interested candidates to select the most qualified member(s) for the working group to be recommended to the CoC Board for appointment.

i. Qualifications:

1. Individual must belong to an agency that is an Orange County CoC General Member or be an Individual General Member
2. At least two (2) years of experience with HMIS preferred

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3. At least two (2) years of experience with the Orange County CoC preferred
4. Works collaboratively with others and can provide constructive feedback
5. Ability to make informed decisions based on objective analysis of available information
6. Desire to positively impact the Orange County CoC
7. Understanding of the Orange County CoC's responsibility of promoting access and effective utilization of mainstream programs
8. Have the availability to commit to serve a minimum term of one year

## VII. Participating Agency Requirements

- a. Submit a signed HMIS Participating Agency Agreement
  - a. Participating agencies must submit an HMIS Participating Agency Agreement, signed by the agency's Executive Director or equivalent leadership before the agency and/or projects can be set up in HMIS.
  - b. On an annual basis, the agreements must be signed during the annual HMIS Agency Audit to have ongoing HMIS access.
- b. Executive leadership must confirm the designation of two staff to be assigned the Agency Administrator role at the time of agency setup.
  - a. If Agency Administrators must be designated after initial agency setup, executive leadership must contact the HMIS Lead Agency (via the HMIS Help Desk) to notify the HMIS Lead Agency of the new Agency Administrators.
  - b. The following information is required of all Agency Administrators:
    - i. Full name.
    - ii. Work email address that includes the staff name. Personal emails will not be allowed. Shared email accounts or general agency email are also not allowed.
    - iii. Work phone number.
- c. Comply with all federal, state and local government laws and regulations regarding non-profit data collection, and with all HMIS Policies and Procedures including the latest versions of the HMIS Data and Technical Standards Final Notice and the HMIS Data Standards Manual relating to the collection, storage, retrieval, and dissemination of client information.
- d. When applicable, participating agencies may be obligated to comply with the Health Insurance Portability and Accountability Act ("HIPAA"), and/or with 42 CFR Part 2, regarding the confidentiality of substance use disorder patient records. Where possible, these agencies should comply with HIPAA, with 42 CFR Part 2, and with the HMIS Privacy Plan. If it is not possible to reconcile all of the applicable rules, then agencies should comply with the more stringent regulations. Participating Agencies are responsible for ensuring HIPAA and 42 CFR Part 2 compliance.
- e. Abide by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (VAWA).

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- f. Participate in an annual HMIS Agency Audit to ensure compliance with the HMIS Policies and Procedures. Review the [Agency Audit Form](#) for an overview of the items included in the audit. Please note that the audit form may change to accommodate changes in requirements.
- The HMIS Lead Agency will audit all HMIS Participating Agencies on a yearly basis, regardless of funding source. The CoC Collaborative Applicant may also attend audits.
  - The HMIS Lead Agency will include the audit checklist in the scheduling email sent to the Agency Administrator at least two (2) weeks prior to the audit.
  - Participating Agencies are expected to be prepared for the audit by completing all items included in the scheduling email.
  - An Agency Administrator must be present during the audit.
  - Participating Agencies and the HMIS Lead Agency can request to reschedule the Agency Audit up to one (1) business day before the audit is scheduled. For example, the agency will notify the HMIS Lead Agency by end of day Monday that the agency will need to reschedule an audit for Tuesday. Requests to reschedule or cancellations that occur after that window has passed are considered unsuccessful attempts to contact the Participating Agency.
    - After 2 unsuccessful attempts to contact the agency the HMIS Lead Agency will reach out to the agency's Executive Director or other leadership.
  - If the agency remains unresponsive after attempting to contact the agency's leadership twice, the agency will fail the audit for that year.
  - If any deficiencies are found in the audit, the Agency Administrator and the HMIS Lead Agency staff person will agree upon a date that the issue should be resolved by. The Agency Administrator and HMIS Lead may revise the due date if needed. If the corrections are not made by the agreed upon date, the agency will fail the audit for that year.
  - Agencies that fail their audit will be reviewed by the HMIS Access Ad Hoc to determine the appropriateness of the agency's continued participation in the OC HMIS, and the agency may have HMIS Access revoked.
  - Agencies that pass their HMIS Annual Audit [are confirmed to be in compliance with the HMIS Policy and Procedures, maintain their HMIS access, and](#) will be recognized on the OC HMIS Website [on their first pass status, if they passed the audit during their first review.](#)
- g. Pay HMIS participation fees based upon CoC Board approved HMIS User License Fee Policy which details the fee structure.
- The HMIS User License Fee Policy is applicable to all Participating Agencies participating in the OC HMIS.
  - Participating Agencies that receive state and/or federal funding that require HMIS participation will be charged for the number of licenses the agency has active at the end of the calendar year, based on the fee structure detailed below:
    - 1 – 5 users: \$750 annually
    - 6 – 24 users: \$2,750 annually
    - 25 or more users: \$3,500 annually
  - Participating Agencies that are Coordinated Entry Access Points (Access Points) will be charged an annual fee of \$200 in addition to any user fees they may incur. This applies to

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- all Access Points, whether or not required to participate in HMIS. The \$200 fee will apply to Participating Agencies regardless of the number of Coordinated Entry System components the agency participates in.
- d. All Participating Agencies are allowed ~~up to~~ two active Agency Administrators at a time. Participating Agencies will be allowed an additional Agency Administrator for every 700 active enrollments at the end of the calendar year. Participating Agencies that ~~require need additional more~~ Agency Administrators ~~in addition to~~ those outlined in this policy must pay the set-up and ongoing user fees for those accounts, and can contact the HMIS Help Desk for an invoice. The additional Agency Administrators license fee is \$759.28 per license annually. This fee is subject to change per vendor licensing fee.
  - e. Participating Agencies may request standalone Looker licenses for the purposes of scheduling ad hoc reports to be sent to a secure location outside of HMIS. The fee for these licenses is \$1,236 per license annually, and is subject to change per vendor licensing fee. This functionality is optional, and not necessary to access the agency's data in HMIS.
  - f. If an HMIS User has access to multiple agencies in HMIS, only the user's primary agency in HMIS will be charged.
  - g. Participating Agencies that join HMIS due to newly awarded funding that requires HMIS participation during the calendar year will be required to pay \$500 prior to the awarded funding being implemented in HMIS.
  - h. Complete any reporting, data quality, data entry, or other requirements outlined by the U.S. Department of Housing and Urban Development (HUD), the Coordinated Entry System (CES) Lead, or the HMIS Lead. Agencies can work collaboratively with other HMIS participating agencies to complete reporting, data quality, data entry, other requirements. The CES Lead and HMIS Lead Agency will only request the minimum necessary data and reports.
    - a. All Participating Agencies in HMIS are included in the HMIS Data Quality Report Cards published on a quarterly basis. The HMIS Data Quality Report Cards are created and posted by the HMIS Lead Agency. Review the Data Quality Monitoring and Reporting Process section of the Data Quality Plan for details regarding this process.
    - b. Participating Agencies with Street Outreach, Emergency Shelter, Transitional Housing, Rapid Re-Housing, Homelessness Prevention, or Permanent Supportive Housing/Other Permanent Housing projects are included in the Project Performance reports published on a monthly basis. Review the Orange County CoC Project Performance Overview document for more details on this process.
    - c. Emergency Shelter, Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, and Other Permanent Housing projects are required to participate in the Housing Inventory Count (HIC) that occurs annually on one day during the last 10 days of January.
    - d. Safe Haven, Emergency Shelter, and Transitional Housing projects are required to participate in the Sheltered Point in Time Count (PIT) that occurs annually on one day during the last 10 days of January.
    - e. The System Performance Measures (SPM) Report is submitted to HUD on an annual basis, and includes Street Outreach, Emergency Shelter, Transitional Housing, Rapid Re-Housing, Permanent Supportive Housing, and Other Permanent Housing projects. The reporting period for this report is October 1<sup>st</sup> through September 30<sup>th</sup>.

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- f. The Longitudinal Systems Analysis (LSA) is submitted to HUD on an annual basis, and includes Emergency Shelter, Transitional Housing, Rapid Re-Housing, and Permanent Supportive Housing projects. The reporting period for this report is October 1<sup>st</sup> through September 30<sup>th</sup>.
- g. Review the [HMIS Participating Agencies Schedule](#) for an estimated timeline of activities that HMIS participating agencies may be required to participate in during the course of the year. Exact dates will be shared by the HMIS Lead.
- i. Comply with the CoC's minimum participation requirements for HMIS usage. The HMIS Lead Agency will conduct a quarterly review to ensure all agencies are meeting the minimum participation requirements. If any of the following are true at the time of the review, the Participating Agency will have one month to rectify the issue. If the issue is not resolved after one month the HMIS Agency Access Working Group will be notified to determine whether or not the Participating Agency should continue to have access to HMIS. If the Participating Agency is found to not meet the minimum participation requirements during the quarterly review at least three times in a year the HMIS Agency Access Working Group will also be notified.
  - a. Participating Agency does not have at least one active HMIS User.
  - b. Participating Agency does not have at least one active enrollment.
  - c. Participating Agency does not have activity in HMIS in the past 30 days. Activity includes enrollments, services, assessments, files, or exits. (This ~~minimum participation requirement~~ is not applicable to Public Housing Authorities)
  - d. Participating Agency did not submit the HIC and/or PIT for appropriate project types during the previous HIC/PIT reporting period.
  - e. Participating Agency does not have at least one Agency Administrator that is an active HMIS user.
  - f. Participating Agency ~~has did not~~~~not had~~ have staff ~~representation for attend~~ at least one HMIS User Meeting during the ~~previous~~ quarter being reviewed. Any staff with an active HMIS account can participate on behalf of their agency.
    - ~~-.i. Agency Administrators will be required to review the meeting updates and share with the HMIS Users at their agency.~~~~ir agency's HMIS User. Agencies with missing HMIS Meeting participation for more than two quarters will sign ....~~
- j. ~~Organizations Participating Agencies found to not~~~~that do not~~ meet one or more of the ~~guidelines conditions above in this section may will~~ be contacted by the HMIS Lead Agency to ~~discuss the appropriateness of the agency's continued participation in the OC HMIS~~address any findings. . ~~Participating Agencies will be given the opportunity to address finding in current quarter, complete additional training and/or complete the HMIS Participating Checklist before additional corrective actions will be issued. tAny findings that are not addressed will be reported to the The HMIS Lead Agency may inform the~~ HMIS Access ~~Ad Hoc~~Working Group to determine the appropriateness of the agency's continued participation in the OC HMIS, and the organization may have HMIS Access revoked.

## VIII. Agreements and Certifications

- a. All Participating Agencies must have updated versions of the documents below on file with the HMIS Lead Agency in order to gain and retain access to the OC HMIS. The forms are available on the OC HMIS website: [HMIS Data & Set Up Forms](#)
  - a. **Interagency Data Sharing Consent Form** – Allows client-level data and enrollment data to be shared among OC HMIS Participating Agencies. HOPWA funded projects are exempt from the data sharing mandate due to privacy laws protecting clients' HIV status. The Interagency Data Sharing Consent Form must be signed by the Participating Agency's Executive Director or equivalent leadership.
  - b. **HMIS Participating Agency Agreement** – Outlines the Participating Agency's responsibilities in protecting client privacy, properly obtaining client consent to share data, monitoring the use of HMIS and reporting any breaches of security by agency staff and improper system use of HMIS. Must be signed by the Executive Director or equivalent leadership.
  - c. **User Agreement** – Outlines the HMIS User's responsibilities in protecting client privacy, proper system use and abiding of the HMIS Policies and Procedures. Must be signed during each user's first log-in to HMIS, and must be renewed annually.

## IX. HMIS User Access Roles

- b. Access roles control the level and type of access the user has to functionality within the OC HMIS. HMIS Users with access to OC HMIS will be assigned the Agency Staff, Agency Administrator, or Read Only access role. Agency Staff or Agency Administrator users can also be given CES access.
  - a. **Agency Staff:** Users with this access have the ability to add and edit client profiles, enrollments, services, and exits, as well as the ability to run client-level, canned, and ad hoc reports. This level of access is the most common in OC HMIS.
  - b. **Agency Administrator:** Users with this access have the same abilities as Agency Staff users, as well as the ability to delete enrollments, services, files, and location data at the user's Primary Agency. The Agency Administrator is responsible to be the first tier of technical support to their agency HMIS Users. After all resources are exhausted, the Agency Administrator will submit an HMIS helpdesk support ticket. Only Agency Administrators are permitted to submit tickets to ensure the request has been reviewed by the responsible parties.
  - c. **Read Only:** Users with this access can view client profiles, enrollments, services, and exits, but cannot add or edit data, and they cannot run canned or ad hoc reports.
  - d. **CES Access:** Users with CES access have access to the Referrals page, which includes adding clients to the Community Queue, adding and editing housing opportunities, and reviewing or denying matches to housing opportunities.

## X. HMIS User Requirements

- a. Agency Staff and Agency Administrator users must complete the following trainings:
  - a. HMIS Part 1 Training – Covers the history and purpose of HMIS and the contents of the OC HMIS Policies and Procedures.

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- b. HMIS Part 2 Training – Covers HMIS functionality, HUD definitions, key terms, and data quality best practices.
  - c. HMIS Task List – A list of tasks to be completed by the user in the Clarity Training Site to assess what the HMIS User has learned.
  - d. HMIS Recertification – OC HMIS Users are required to complete an annual HMIS Recertification Training to reinforce HMIS data entry functionality.
- b. Agency Administrator users must complete the following trainings in addition to the trainings mentioned in part A of this section:
- a. Agency Administrator Training – Includes a review of the responsibilities of an Agency Administrator.
- ~~b.c. Agency Administrators will be required to take an annual refresher to that covers responsibilities, guidance related to data quality and system updates.~~ Read Only users must complete the following training:
- a. HMIS Part 1 Training – Covers the history and purpose of HMIS and the contents of the OC HMIS Policies and Procedures handbook.
- ~~e.d.~~ Users requesting CES Access must complete the following training in addition to the trainings mentioned in part A of this section.
- a. HMIS Coordinated Entry Training – Includes an overview of the different roles involved in the CES process, and a review of the HMIS functionality needed for each role.
- ~~d.e.~~ All HMIS Users must provide the following information in order to receive an HMIS account:
- a. The HMIS User's first and last name.
  - b. The HMIS User's work email. Personal emails will not be allowed. Shared email accounts are also not allowed.
- ~~e.f.~~ All HMIS Users must be able to clearly explain the purpose and benefit of HMIS and the related HMIS Consent Form to people experiencing or at-risk of experiencing homelessness as detailed in the Client Privacy section. This includes providing an overview of:
- a. What is HMIS?
  - b. What personal identifying data will be collected and how it will be used
  - c. Privacy and confidentiality standards
  - d. Revocation of consent and how to do it

## XI. Agency Administrator Requirements

- a. Agency Administrators are the designated point of contact for the Participating Agency regarding HMIS related requests and updates. Agency Administrators must complete the Agency Administrator training before being certified as Agency Administrators. This training covers the responsibilities of the Agency Administrator, as well as training on HMIS functionality specific to Agency Administrators. ~~Agency Administrators will be required to take an annual refresher to that covers responsibilities, guidance related to data quality and system updates.~~
- b. Agency Administrators must be employed by the Participating Agency, and cannot be volunteers.
- ~~b.c.~~ Agency Administrators are responsible for training all staff at their agency as needed.
  - a. Identify staff members who need access to HMIS and ensure they complete any required HMIS User trainings in a timely fashion.

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- b. Inform the HMIS Help Desk of HMIS Trainings completed by any users at the agency by submitting the HMIS Account Update and Testing Form.
  - ~~c.i.~~ Agency Administrators must submit the form in a timely fashion within 2 business days of the training being completed. User's training completion must be within 60 days of the HMIS Account Update and Testing Form submission to be accepted. If the user's training completion is over 60 days, the users will need to retake the training courses and HMIS Skill Test. Completed trainings are valid for 60 days. If the form is not submitted within 60 days of the training completion, then the user will need to retake the trainings outlined in the HMIS User Requirements section for their desired level of access.
- ~~c.d.~~ Agency Administrators are the primary technical support for their HMIS Users.
  - a. All HMIS User technical questions should be directed first to the Agency Administrator. If the Agency Administrator cannot solve the problem, Agency Administrators can then contact the HMIS Help Desk. HMIS Users who are not certified Agency Administrators are not allowed to contact the HMIS Help Desk. See the Help Desk Policies section for more details.
- ~~d.e.~~ Agency Administrators are responsible for sharing HMIS updates and other relevant information with all HMIS Users at their agency.
  - a. Agency Administrators periodically receive emails from the HMIS Lead Agency regarding OC HMIS. Agency Administrators are responsible for reading these emails and communicating the relevant information in them to their staff who are HMIS Users.
  - b. Agency Administrators should attend the monthly HMIS User Meetings. These webinars are announced via direct email to all Agency Administrators.
- f. Agency Administrators must notify the HMIS Lead Agency of all personnel changes using the HMIS Account Update & Testing Form. This includes users that no longer need access to HMIS, as well as users that need a different access role.
  - a. When an Agency Administrator no longer needs access to HMIS, the form can be submitted by another Agency Administrator at the agency, or by executive leadership. A new Agency Administrator must be identified by the Participating Agency at the time of form submission to ensure proper support for the users at the Participating Agency.
  - ~~b.~~ Forms should be submitted within 2 business days of the personnel change.
  - ~~c.~~ When an HMIS User no longer needs access to HMIS, whether due to changing job responsibilities or departure from the agency, Agency Administrators must complete the HMIS Account Update & Testing Form within 2 business days.
  - ~~d.~~ When there is any changes to user's access role such as a Read Only user that needs to update their role to Agency Staff or when users need to request access to Coordinated Entry (CES). Agency Administrators must complete the HMIS Account Update & Testing Form to request for changes in access role.
  - ~~e.~~ When an Agency Administrator no longer needs access to HMIS, whether due to changing job responsibilities or departure from the agency, another Agency Administrator at the Participating Agency or executive leadership is required to submit the contact information of the replacement Agency Administrator via the HMIS Help Desk, within 2 business days.
- ~~h.g.~~ Agency Administrators must monitor compliance with standards of confidentiality and data collection, entry, and retrieval outlined in the OC HMIS Policies and Procedures.

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- a. Inform HMIS Users of obligations to report suspected instances of noncompliance and/or security violations to the Agency Administrator as soon as possible.
  - b. Escalate any security violations reported by HMIS Users to the HMIS Lead Agency via the [HMIS Help Desk](#).
  - c. Ensure that all HMIS Users at the Participating Agency are aware that HMIS usernames and passwords are NOT to be shared with anyone under any circumstances. HMIS Users should not share their HMIS login information with other staff at their agency, their Agency Administrator, their executive leadership, their IT Staff, etc.
  - d. Ensure all HMIS Users at the Participating Agency are able to clearly explain the purpose and benefit of HMIS and the related HMIS Consent Form to clients as included in the HMIS User Requirements section.
- ~~i.h.~~ Agency Administrators are responsible for ensuring that agency technology equipment meets the specifications outlined in the Technical Standards section of this document.
- ~~j.i.~~ Agency Administrators must ensure that agency data quality either meets or exceeds data quality thresholds for each relevant project type or is on track to meet said thresholds.
- a. Agency Administrators should be able to describe their agency's regular data quality monitoring procedure. For example, "The Participating Agency runs x, y, and z reports each month. The Agency Administrator identifies data quality errors and delegates corrections to Users x, y, and z." Agency Administrators must review the OC HMIS Data Quality Plan for guidance. The HMIS Lead Agency is available to help develop an agency's data quality monitoring procedure as needed.
  - b. Agency Administrators must work with the HMIS Lead Agency to ensure the Participating Agency is collecting all relevant Universal and Program Specific Data Elements dependent on project type and funding source.
  - ~~c.~~ All data entered into the OC HMIS must meet applicable Data Quality and Data Timeliness standards based on project type as agreed by the CoC in partnership with the CoC Board and the CoC Collaborative Applicant.
    - ~~i.~~ All HMIS participating agencies regardless of funding must strive to meet the 95% or higher data completeness thresholds goal for valid responses. Please review the OC HMIS Data Quality Plan for additional information on local data standards. Each project type has a different data quality threshold outlined for each project type in the OC HMIS Data Quality Plan.
    - ~~ii.~~ All HMIS participating agencies regardless of funding must strive to meet the enter data into HMIS within 3-business days of the date the information was collected. threshold to enter data into HMIS.
  - d. Agency Administrators are responsible for ensuring the Participating Agency is in compliance with the OC HMIS Data Quality Plan.
- ~~k.j.~~ Agency Administrators must ensure all projects in HMIS are set-up correctly, including the appropriate project type, and kept up to date as changes occur, including changes to which includes but is not limited to ensuring project type, funding, services provided, and and bed inventory is accurate information, and Agency Administrators are also responsible for notifying the HMIS Lead Agency when a project is no longer serving clients.
- a. Participating Agencies should notify the HMIS Helpdesk when they would like any of their projects to start participation in the OC HMIS. The HMIS Lead Agency and/or the CoC

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Collaborative Applicant reserves the right to deny access to agencies and/or projects that do not serve people experiencing or at risk of experiencing homelessness.

- b. Agency Administrators are required to notify the HMIS Lead Agency within 5 business days when of project changes have occurred occurring. ~~within 5 business days, including changes in funding sources and bed inventory. Agency Administrators will request changes to custom fields, services, funding sources, and bed inventory using the forms available for Project Currently Set Up in HMIS on the HMIS website. to request for project set up updates.~~
- c. The HMIS Lead Agency and/or the CoC Collaborative Applicant will provide technical assistance and recommendations to the agency on how to best set up the project in HMIS to ensure adequate reporting and benefit to the Orange County CoC and its System Performance Measures Report. Projects whose performance and/or data quality negatively affects the CoC as a whole may be subject to corrective action. Corrective action discussed in the [Data Quality Plan](#) around performance will be ~~done~~ completed in conjunction with the CoC Collaborative Applicant.
- d. Agency Administrators are required to submit a ~~Project Close Out Form~~ Agency/Project Deactivation Form within 15 business days when projects are no longer active, are is under renovation for over 30+30 days or more, or are temporarily not providing services for over 30+ days30 days or more. The HMIS Lead Agency will deactivate the project in HMIS so no new enrollments can be added to the project. Data from deactivated projects will remain available in HMIS ~~for 7 years per HUD requirements~~ for reporting purposes.
  - i. ~~Agency Administrators will conduct a project exit procedure and review agency data during the 15-day window. Agency Administrators will work with their agency's HMIS users to address any data quality issues and exit all clients before requesting the project to be deactivated. Before submitting the request to deactivate the project, Agency Administrators will work with HMIS Users at the Participating Agency to review and correct data as needed to ensure data completeness and accuracy. Once all data quality corrections are resolved, all enrollments should be exited.~~

### ~~XIII.~~ XII. Technical Standards

- a. Participating Agencies must adhere to the following technical standards with regards to all technical equipment used to access HMIS. Participating Agencies must also adhere to the [HUD HMIS Technical Standards](#). The HMIS Lead Agency is not responsible for providing proper technical equipment or for providing Information Technology (IT) services unrelated to HMIS.
- b. The most recent version of the following web browsers are supported for accessing HMIS:
  - a. Google Chrome
  - b. Microsoft Edge
  - c. Mozilla Firefox
  - d. Apple Safari
- c. An internet connection is required to access HMIS, and is the sole responsibility of the Participating Agency.

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- d. All screens must lock within five (5) minutes of inactivity and point to the computer terminal or mobile device login page upon subsequent activity. HMIS Users should manually lock their screen anytime they leave their device unattended.
  - a. Windows: Press the Windows + L keys on the keyboard
  - b. Mobile device: Briefly press the Power button
  - c. Mac: Press Control + Command + Q keys on the keyboard
- e. Computers, Tablets, or Other Mobile Devices that access HMIS and/or share a network with computers and/or mobile devices that access HMIS (iPads and other devices that run on iOS are exempt from these requirements)
  - a. Must have virus protection software that has been updated in the past week and performs scans daily and automatically updates to the most current version.
  - b. Must have a firewall in place between any computer and internet connection for the entire network, be protected with at minimum Wired Equivalent Privacy (WEP), use Network Address Translation (NAT), and maintain the most recent virus security updates.
- f. All computer terminals and mobile devices used to access HMIS (including organization network equipment) must be stored in a secure location (i.e., a locked office area that is not accessible to the public).
  - a. Participating Agencies must adhere and be consistent with the agency's expectations of information security for staff working at the office full-time. Staff who work remotely will be expected to ensure the protection of proprietary agency and client information accessible from their remote office. Steps include, but are not limited to, the use of locked file cabinets, computers and desks; the regular maintenance of passwords; and any other steps appropriate for the job and the environment. Participating Agencies should be at a minimum in compliance with the OC HMIS Technical Standards and the policies outlined in this document.
- g. The executive leadership and/or equivalent leadership within the Participating Agency will be responsible for the maintenance and disposal of onsite computer and mobile device equipment. This includes:
  - a. Purchase of and upgrades to all existing and new computer and mobile device equipment for utilization in the system.
  - b. Provision of computer terminals or mobile device to all HMIS Users for accessing HMIS that have a unique username/password to log onto the operating system.

### ~~XIV~~.XIII. Privacy

- a. HMIS Account Passwords
  - a. The HMIS vendor will enforce a password change for all HMIS accounts every 180 days.
  - b. HMIS Users shall never share passwords or HMIS accounts for any reason. The sharing of HMIS accounts and/or passwords directly endangers the privacy of clients who entrust their personal identifying information to the OC HMIS. HMIS Users found to be sharing HMIS accounts and/or passwords will be subject to corrective action.
  - c. HMIS Users shall never have passwords autosaved on any devices they use to access HMIS. Passwords should be memorized, but if passwords is-need to be stored,

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Participating Agencies will use a password manager to securely store their user's passwords.

- i. OC HMIS The HMIS Lead does not endorse any specific password manager application, but they may be used at the discretion of the Participating Agency and their IT personnel. Proton Pass is shared as a free option that each agency will need to have their IT personnel review and approve use of.

d. After 30 minutes of inactivity in the OC HMIS, the system will automatically lock the HMIS User out and will require password re-entry to gain access to HMIS.

d.e. If an HMIS User attempts to log in four (4) times with an incorrect password, the OC HMIS will automatically lock their account. The HMIS User will be unable to access HMIS for two hours unless the Agency Administrator contacts the HMIS Help Desk to unlock the account.

#### b. Access to HMIS

a. As discussed in the Agency Administrator Responsibilities section, agency staff who no longer need access to HMIS will have their HMIS account access revoked. In the event that HMIS account access is not revoked for any reason, the former HMIS User is required to act with integrity and not attempt to access HMIS if their job duties no longer include HMIS or if they leave the Participating Agency.

b. The HMIS Lead Agency reserves the right to lock the account of an HMIS User who has not completed required trainings. The HMIS Lead Agency will unlock the account once the required trainings have been completed.

c. If an HMIS User does not log into HMIS for 60 days, the HMIS account will be locked automatically. The HMIS User will receive a notification two (2) calendar days prior to the account being locked. If an account is locked due to inactivity, the HMIS User will be required to complete the trainings outlined in the HMIS User Requirements section as well as any other trainings required by the HMIS Lead Agency to regain access to HMIS. HMIS Reactivation Training Course and HMIS Skill Test within 60 days of their account being set to inactive as a minimum requirements to reactivate the account. Users will additional access will be required to take additional course to regain access to HMIS. After the initial 60 days have past of the user's account being set to inactive, the user will need to retake the HMIS Part 2, HMIS Part 2, HMIS Skill Test and additional courses if applicable. If these trainings are not completed within 60 days of the account being deactivated, the user will be required to take the trainings included in the HMIS User Requirements section.

d. Users that transition from one Participating Agency to another may have their HMIS account reactivated without requiring additional training if the user has logged into their account within the last 60 days.

i. The user will be eligible for the same level of access to HMIS that they had at the previous agency, subject to approval by the Agency Administrator at the new agency.

ii. Access to any additional agencies will need to be approved by the agencies the user is requesting access to. For example, users that need access to enter Coordinated Entry data will need to be approved by the CES Lead. For example, the user had CES Agency Staff access previously will have this same access level

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~~with their current primary agency per the Agency Administrators' discretion. The user will have to be re-approved for additional agency. For example, the user will need the CES Lead to approve access to County of Orange to support with CES care coordination.~~

iii. ~~The Agency Administrator at the new agency must submit the Account Update & Testing Form to request the account reactivation. The HMIS Lead will update the email address associated with the account, and change the Participating Agency that the user is employed by.~~

~~iv. If the user account was inactive for at least 60 days, the user will have to retake the HMIS training. Please see Access to HMIS item c for additional information. be required to complete the trainings listed in the HMIS User Requirements section.~~

#### c. HMIS Data

##### a. Participating Agencies

- i. All HMIS Users are required to ensure that client identifying information is never sent across an unencrypted network, saved in an unprotected folder on a computer, or, in the case of hard copies of client identifying information, stored anywhere other than a locked file cabinet or office.
- ii. Client Identifying Information CANNOT be sent over unencrypted email either between a Participating Agency and the HMIS Lead Agency or between staff at a Participating Agency. The only permissible way to discuss a client over unencrypted email is using the client's HMIS ID number.
- iii. Participating Agencies must have a formal policy for intra-agency communication regarding clients that protects client privacy.

##### b. HMIS Vendor

- i. The HMIS Vendor will perform daily and weekly backups to prevent loss of data.
- ii. Backups will be stored both onsite and offsite. All standard security and privacy precautions apply to offsite storage. The offsite storage facility is equipped with surge protectors and natural disaster protective measures.

#### d. Client Privacy

- a. In order for client records to be shared in HMIS, clients must consent to share their data with other Participating Agencies in HMIS.

i. If the agency's first interaction with the client is over the phone, or otherwise not in person, clients can verbally consent to share their data. However, during the first in person meeting with the client, the Participating Agency must ask the client to sign the **Client Consent to Share Protected Personal Information Form** to continue sharing their data in HMIS.

~~0.1.~~ There may be cases where care coordination and supportive services are offered virtually only, such as scheduling financial assistance for clients that are enrolled in Homelessness Prevention. For these cases, agency the Participating Agency can request for the client to send the Client Consent to Share Protected Personal Information Form electronically via applications such as DocuSign. Agency The Participating Agency will need to upload the signed form into HMIS as confirmation the client consents to share their data with other Participating HMIS Agencies.

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- ii. Participating Agency staff must explain ~~the form to clients and how their information is used and viewed~~that signing the form means that the client's record will be shared with other HMIS Participating Agencies for care coordination, and that the client's data may be shared in data requests approved by the CoC Board for analytical use or academic research purposes. The list of HMIS Participating Agencies is available on the OC HMIS website.
  - iii. The form can be digitally signed in HMIS, or the Participating Agency can print a physical copy of the form for the client to sign. If the client signs a physical copy, the agency is required to upload the signed consent form to HMIS. If the Participating Agency chooses to keep physical files, they must be stored in a secure location.
- b. Protected Personal Information (PPI) is defined in this manual and the Consent to Share Personal Protected Information form as:
  - i. [Clients'] name and [Clients'] contact information
  - ii. [Clients'] social security number and date of birth
  - iii. [Clients'] basic demographic information such as gender and race/ethnicity
  - iv. [Clients'] history of homelessness and housing (including [Clients'] current housing status, and where and when [Clients] have accessed services)
  - v. [Clients'] self-reported medical history and disability status, including mental and physical health concerns, substance abuse history, and HIV/AIDS status
  - vi. [Clients'] case notes and services
  - vii. [Clients'] income sources and amounts; and non-cash benefits
  - viii. [Clients'] veteran status
  - ix. Information about other members of [Clients'] household
  - x. [Clients'] self-reported history of domestic violence
  - xi. [Clients'] photo (optional)
- c. If clients refuse to sign the **Client Consent to Share Protected Personal Information Form** they cannot be pressured into signing the form or denied services on the basis of their refusal to sign. Participating Agencies should follow the procedure outlined [Client Privacy section](#) within the Accessing and Completing Release of Information (ROI) Page Knowledge Base Article for entering client information into HMIS when clients refuse to sign the **Client Consent to Share Protected Personal Information Form**. Refusal to sign the consent form means that all of that client's data is only visible by the Participating Agency serving the client, HMIS System Administrators, and the HMIS Vendor.
- d. Upon signing the **Client Consent to Share Protected Personal Information Form** clients must be made aware of their right to revoke their consent to share protected information at any time.
- e. Participating Agencies must have copies of the **Revocation of Consent Form** available in areas accessible to clients at all times. Clients should NOT have to request this form from participating agency staff.
  - i. If a client submits a **Revocation of Consent Form**, Participating Agency staff must follow the most current procedure for removing sharing access to the client's protected personal information in HMIS. Review the [Refusing/Revoking Consent to Share Personal Information](#) knowledge base article for more information.

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- f. Participating Agencies must post the **Note Regarding Collection of Personal Information** in all areas where staff are collecting data from clients to be entered into HMIS. ~~data entry occurs. PP~~ Participating Agencies should direct outreach teams to give a copy of the Note to each outreach worker, or and an alternative is the outreach teams should have has a digital copy to share with the clients when conducting case management session collecting data to be entered into HMIS. -
- g. Participating agencies that maintain a public website must post the **Privacy Notice** on their website.
- h. Participating Agencies must have copies of the **HMIS Client Grievance Form** available in areas accessible to clients at all times in the event of an HMIS related grievance. Clients should NOT have to request this form from Participating Agency staff.
  - i. In the event that the Participating Agency's grievance policy was not able to resolve the grievance, clients will submit the grievance form directly to the HMIS Lead Agency.

## XIV. Client Record Requests

### ~~a. Client Record Requests~~

- ~~— Clients requesting specific information from their HMIS record may work directly with any HMIS Participating Agency to obtain that information. The Participating Agency is responsible for verifying the client's identity prior to releasing any information.~~
  - ~~— Any case notes entered into a client's HMIS record may only be shared by the Participating Agency that entered the case notes, and may be released at the discretion of each Participating Agency.~~
  - ~~— Participating Agencies do not have access to a client's complete record in HMIS, and will only be able to provide the client with information that can be accessed by that specific agency.~~
- a. Clients that want to receive their ~~full~~ HMIS record may ~~work with an~~ submit their request to an Agency Administrator at any Participating Agency, ~~or they may contact the HMIS Lead directly.~~
  - a. To submit a ticket directly to the HMIS Lead, clients can call the HMIS Help Desk at 714-589-2360. Requests submitted to the HMIS Lead will be responded to in accordance with policies outlined in the Help Desk section of this document.
    - i. The HMIS Lead will verify the client's identity in accordance with the procedure outlined for verifying a client's identity virtually in the Client Record Request knowledge base article.
    - ii. The HMIS Lead will send the client's record electronically through a Box link, or through the mail at the client's request.
  - ~~i.b. to submit a Client Record Request Form. Requests submitted to Agency Administrators are responsible for submitting them must be submitted to the HMIS Lead through the Client Record Request Form to the HMIS Lead on the client's behalf. Case notes can only be released by the agency that entered them into HMIS, and will not be included in Client Record Requests submitted to the HMIS Lead.~~

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- i. The Participating Agency is responsible for verifying the client's identity prior to submitting the form to the HMIS Lead Agency. Procedures for verifying a client's identity in person or virtually are outlined in the Please review the Client Record Request Knowledge Base article for list of methods to verify the client's identity.
- ii. At the time of the request, the Agency Administrator must decide with the client an appropriate method for the client to receive their data that does not violate the privacy of the client's data. Possible methods include providing the record in person, securely sending the record through a content management software like Box, or sending the record by mail.  
The HMIS Help Desk will respond to the requests as outlined in the HMIS Help Desk Policies section.
- ~~iii.~~
- ~~iv.~~ The HMIS Lead and Agency Administrators must work with the client to determine what type of data they would like to see from their HMIS record at the time the request is received. Only the types of data listed below will be included in Client Record Requests.:
  - ~~ii.~~ i. Client Record Request Dashboard, which includes the following information:
    - 1. Demographics: Client characteristics i.e., Race, Gender, Ethnicity, and Veteran Status
    - ~~1.2.~~ 2. Release of Information: Whether or not the client consented to share their data in HMIS, the Participating Agency that collected the consent, and the Start and End date of that consent
    - ~~1.3.~~ 3. Enrollment History: List of Participating Agencies and projects that served the client, and the Start and End Dates of those services
    - ~~1.4.~~ 4. Uploaded Documents: Documents uploaded into HMIS on the client's behalf i.e., Verification of Homelessness, Disability Verification, etc.
  - ii. Client responses to assessments completed at entry, exit, or at anytime during their program enrollment(s)
  - ~~iii.~~ iii. Data entered by a Participating Agency regarding the client, including Service ~~details~~ Type and Notes, Public Alerts, and Locations
  - ~~iv.~~ iv. Coordinated Entry data, including status, history, and events
  - ~~v.~~ v. Documentations that the client provided or signed will be permitted to be shared with the HMIS Client Record Request (i.e., copy of identification card, self-reported homelessness verification, signed release of information form):
- ~~d.a.~~ At the time of the request, the Agency Administrator must decide with the client an appropriate method for the client to receive their data that does not violate the privacy of the client's data.
- ~~d.a.~~ The HMIS Help Desk will respond to the requests as outlined in the HMIS Help Desk Policies section.
- ~~i.d.~~ An The Client Record Request Form Documentation will be provided to the client at the same time as the client record. The HMIS Lead or Agency Administrators at the agency Participating Agency is are required to review the data documentation with the client upon request, but may not be able to answer specific questions about services provided by another agency. Clients are encouraged to direct questions about services they

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- received to the Participating Agency that provided them. Agency Administrator will review the Client Record Request Form Documentation with the client as the initial step.
- b. Clients requesting specific information from their HMIS record may work directly with any HMIS Participating Agency to obtain that information. The Participating Agency is responsible for verifying the client's identity as outlined in the Client Record Request knowledge base article prior to releasing any information.
- a. Examples of information that may be requested include but are not limited to the client's status in the Coordinated Entry System and copies of documents that were provided by the client.
- b. Any case notes entered into a client's HMIS record may only be shared by the Participating Agency that entered the case notes, and may be released at the discretion of each Participating Agency. Participating Agencies are encouraged to review their liability insurance and the contents of the case notes prior to sharing with a client.
- i. Prior to sharing case notes, Participating Agencies must redact identifying third party information, like staff or agency names, names of other clients, or shelter bed numbers.
- c. Participating Agencies do not have access to a client's complete record in HMIS, and will only be able to provide the client with information that can be accessed by that specific agency.
- ~~d.c.~~ No client shall have access to another client's data for any reason, except for parents or guardians of a minor requesting their minor child's records.
- d. Clients may request edits to data associated with their client profile included in HMIS. Examples of data clients may request edits to include responses to enrollment and assessment questions, and documentation contributed by the client. Data contributed by a Participating Agency, including but not limited to services, case notes, and enrollment history, cannot be edited at a client's request.
- ~~k.a.~~ Clients that wish to edit data for a specific project must contact the agency that administers the project directly to request the edit.
- ~~k.b.~~ Clients cannot request edits for a specific project if the project has closed and/or the agency that administered the project is no longer participating in HMIS.

## XV. Data Use and Disclosure

- a. Client data may be used or disclosed for HMIS system administration, technical support, program compliance, analytical use, and other purposes as outlined in the Privacy Notice or required by state or federal law. Client consent is not required for these uses and disclosures. Uses involve sharing parts of client information with persons within a Participating Agency. Disclosures involve sharing parts of client information with persons or organizations outside a Participating Agency.
- b. Participating Agencies may use data contained in OC HMIS to support the delivery of services to clients experiencing homelessness or those at risk of homelessness in Orange County. Participating Agencies may use or disclose client information for administrative functions, technical support, and management purposes. Participating Agencies may also use client information for internal analysis, such as analyzing client outcomes to evaluate programs.

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- c. The HMIS Vendor and any subcontractor authorized by the HMIS Lead Agency shall not use or disclose data stored in the OC HMIS without expressed written permission from the HMIS Lead Agency in order to enforce information security protocols. If granted permission, the data will only be used in the context of interpreting data for research and system troubleshooting purposes. The Service and License Agreement signed by the HMIS Lead Agency on behalf of the CoC and the HMIS vendor contains language that prohibits access to the data stored in the software except under the conditions noted above.

## XVI. Data Release

- a. Data release refers to the dissemination of aggregate or client-level data for the purposes of system administration, technical support, program compliance, ~~and or~~ analytical use.
- b. No identifiable client data, including but not limited to name, Social Security Number, or Date of Birth, will be released by the HMIS Lead Agency or any Participating Agencies to any person, agency, or organization not participating in OC HMIS for any purpose without written permission from the client, with the exception of the uses and disclosures outlined in ~~this document~~ Section XIII the previous section, subpoenas, or other circumstances as required by state and federal law.
- c. Each Participating Agency owns the data that is entered and managed by their agency in HMIS. The Participating Agency may not release personal identifiable client data without written permission from the client. Participating Agencies may release aggregate data for all clients to whom the Participating Agency provided services. ~~Agencies may share aggregate data for their agency as a whole, or for each of their projects as outlined in the Data Request Matrix table.~~
- d. Coordinated Entry data is owned by the CES Lead.
  - a. Service Providers with access to Coordinated Entry data are not permitted to publish any Coordinated Entry data without approval of the CoC Board as outlined in the Data Request Matrix.
  - ~~b. The CES Lead and CES Administrators are required to adhere to policies outlined in this section.~~
- e. The HMIS Lead Agency, CoC Collaborative Applicant, CES Lead Agency, and CES Administrators may release aggregate data about the CoC at the program, sub-regional, and regional level. Aggregate data may be released without organization or CoC Board permission.
- f. Requests for regional or sub-regional data, including requests for academic research purposes, must be reviewed and approved by the CoC Board prior to the data being released if the request has not been pre-approved according to the Data Request Matrix below. If the request is pre-approved, the CoC Board will be notified that data has been shared at the next scheduled meeting.
- g. Requests for data must be submitted to the HMIS Lead Agency by submitting the Data Request Form, which includes the information below. Some request may be required to be reviewed by the CoC Board, and will be added to the meeting agenda as time allows. The HMIS Lead Agency will communicate updated data request timelines with to the Requestor.
  - a. Requestor's Name
  - b. Requestor's Organization
  - c. Description of the data needed, including reporting period and specific data elements
  - d. Description of what the data will be used for (research, media use, etc)

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- e. Will this data be published? If yes, where?
- f. When is the data needed by?
- g. Is this a recurring data request? If so, how often is this data needed?
- h. Data requests must intend to facilitate positive impact on the structure or processes within the Orange County Continuum of Care, or otherwise benefit people experiencing homelessness or at risk of homelessness in the Orange County Continuum of Care. Requests must include a local stakeholder or “champion” within the Continuum of Care that will be responsible for sharing the results of the request, and implementing changes within the Continuum of Care as appropriate.
- i. Exploratory data requests must include HMIS data as the primary focus of the analysis. Using HMIS data anecdotally in larger analyses will not be permitted.
- h.i. Data Requests for academic research purposes may include client identifying information if the academic research is being conducted by:
  - a. An individual employed by or affiliated with a Participating Agency for use in a research project conducted under a written research agreement approved in writing by the CoC Collaborative Applicant; or
  - b. By an institution for use in a research project conducted under a written research agreement approved in writing by the CoC Collaborative Applicant.
  - c. A research agreement must:
    - i. Establish rules and limitations for the processing and security of personal protected information in the course of the research;
    - ii. Provide for the return or proper disposal of all personal protected information at the conclusion of the research;
    - iii. Restrict additional use or disclosure of personal protected information, except where required by law; and
    - iv. Require that the recipient of data formally agree to comply with all terms and conditions of the agreement.
- i.k. Data Requests that seek clarification or require a subset of data that has already been published in the form of a dashboard or as part of another data request as approved by the CoC Board may be provided by the HMIS Lead Agency in consultation with the CoC Collaborative Applicant.

#### Data Request Matrix

| Data Request Criteria                | HMIS Participating Agency |                | Entity Does not Participate in HMIS |                | CoC Board Sub-Committee/Work Group |                | CES Administrators <sup>1</sup> |                |
|--------------------------------------|---------------------------|----------------|-------------------------------------|----------------|------------------------------------|----------------|---------------------------------|----------------|
|                                      | Approved                  | Needs Approval | Approved                            | Needs Approval | Approved                           | Needs Approval | Approved                        | Needs Approval |
| Aggregate system level data          | X                         |                |                                     | X              | X                                  |                | X                               |                |
| Program Descriptor data <sup>2</sup> |                           | X              |                                     | X              | X                                  |                | X                               |                |

<sup>1</sup> CES Administrators include the Agency Administrators at agencies that have been contracted by the CES Lead to manage and facilitate the Coordinated Entry System in HMIS.

<sup>2</sup> Project descriptor data elements (PDDE) are intended to identify the organization, specific project, and project details for each project participating in HMIS. Approved entities may request PDDE for any projects in HMIS.

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|                                |   |   |  |   |   |   |   |   |
|--------------------------------|---|---|--|---|---|---|---|---|
| Client-level data <sup>3</sup> |   | X |  | X |   | X |   | X |
| Ongoing data requests          | X |   |  | X |   | X | X |   |
| For use as research            |   | X |  | X | X |   |   | X |
| For media release              |   | X |  | X |   | X |   | X |
| For other public use           |   | X |  | X |   | X |   | X |

## XVII. Data Breach

- a. A data breach is the unauthorized access or acquisition of data that compromises the security, confidentiality, or integrity of data in HMIS. Data may be in any format (electronic, hardcopy or verbal) and may range from a single piece of data and/or an entire data system.
- b. Breaches to the HMIS servers are managed by the HMIS Vendor. If a breach to the HMIS servers occurs, the HMIS Vendor will notify the HMIS Lead Agency, and the HMIS Lead Agency will notify the Participating Agencies as appropriate.
- c. Data breaches may also occur at Participating Agencies. The Participating Agency is responsible for immediately mitigating the data breach to the extent possible as soon as the breach is identified, including notifying clients who may have been impacted by this breach. Participating Agencies will make at least 3 attempts over 2 weeks to notify the client impacted by the following methods; telephone, secure email, and mail. The outreach attempts will be documented as case notes in HMIS. Participating Agencies will at a minimum in compliance with the policies outlined in this document. Participating Agencies will be required to also be in alignment with their internal agency policies related to data breach.
  - a. Data breaches could include but are not limited to:
    - i. HMIS Users sharing HMIS account and/or passwords with others.
    - ii. Sharing client identifying information with anyone that doesn't have access to HMIS and/or hasn't been approved to access that data.
    - iii. Sharing client identifying information over an unencrypted network.
    - iv. Leaving printed documents with client identifying information in an unsecured location.
- d. Any suspected data breach must be reported to the HMIS Lead Agency by submitting the Data Breach Incident Report. The HMIS Lead Agency will review the breach and the mitigating actions taken by the Participating Agency, and will assist with any additional action that may be needed.
- e. The HMIS Lead Agency will report all data breaches to the HMIS Agency Access Working Group, and the HMIS Agency Access Working Group will determine if any corrective action is needed. Corrective action may include but is not limited to notifying the CoC Board, CoC Collaborative Applicant, and funders of the Participating Agency, and revoking HMIS access.
- f. The corrective actions below will be taken for users that commit data breaches. Participating Agencies with repeated data breaches amongst different users will be discussed with the Agency Access Working Group to determine additional corrective actions.

<sup>3</sup> Client-level data requests from CES Administrators and CoC Board Sub-Committees or Work Groups should be submitted through the HMIS Help Desk, and will be reviewed and approved by the CoC Manager, the CES Lead, and the HMIS Lead.

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- a. First occurrence: The HMIS Team will send a written explanation of the data breach that occurred to the Agency Administrators. The user that completed the breach will complete the HMIS Privacy training. The incident is noted by the HMIS Lead, and the Agency Administrators at the Participating Agency will confirm understanding.
- b. Second occurrence: The HMIS Team will send a formal warning to the agency's Executive Director. The user must complete the HMIS Privacy training and sign acknowledgement.
- c. Third occurrence: The user's HMIS access is temporarily paused and a meeting with agency's leadership will be scheduled. The user will develop and submit a compliance plan to the HMIS Lead to regain access to HMIS.
- ~~d.~~ Forth occurrence: The user's access to HMIS will be revoked. After 6 months, the user may request HMIS access after completing the trainings in the HMIS User Requirements section.

## XVIII. Data Integration

- a. Data integration is the process of exporting data from one data system and importing it into another. For the purposes of this policy, data import is the process of taking data from an outside case management database and importing it into HMIS, and data export is the process of taking data out of HMIS and importing it into an outside case management database.
- b. Requesting Agencies must be approved for HMIS access before submitting any data integration requests. Requests for data import or export must be submitted through the Data Integration Request Form.
  - a. Agencies requesting to integrate their own HMIS data with a case management software will be reviewed and approved by the HMIS Lead Agency.
  - b. Agencies requesting to integrate HMIS data from other Participating Agencies that they do not manage will be reviewed and approved by the CoC Board.
  - c. Requests to integrate CES data will be reviewed and approved by the HMIS Lead Agency and the CES Lead Agency.
- c. All approved data integrations will occur through an Application Programming Interface (API) or other approved integration/systems connector methods. The data integration process ensures that external case management software is securely connected to OC HMIS through a structured pathway. Data from outside systems is first transmitted to Journey DB, an intermediate database, where it is encrypted using Transport Layer Security (TLS) during transmission and AES 256-bit encryption for storage of source code, data, and logs. From there, the data is securely transferred to HMIS, ensuring consistency and compliance with data governance standards.
  - a. If the ~~systems database data~~ integration ~~approach~~ will be utilizing a Connector that is not an API, the method will need to be investigated and approved by the HMIS Lead Agency to ensure that the proper security and data integrity protocols are met, and that the integration workflow can accommodate this method. There is no guarantee that all ~~systems~~ connection methods and/or API's can be accommodated.
- d. Prior to transferring any data, the HMIS Lead Agency will conduct an Agency and Vendor Review which may include but is not limited to privacy, security, data sharing, data storage, data timeliness, data completeness, and data collection practices.

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- e. All approved data integrations are subject to an annual review. This review will ensure the data integration is in compliance with the HMIS Policies and Procedures, and that the items included in the Agency and Vendor Review are still in effect. If the review is failed, the data integration will be terminated.
- f. Data integrations are subject to all Policies and Procedures outlined in this document. Imported data is owned by the agency responsible for managing the data in HMIS.
- g. Violation of any of the policies and procedures in this document may be grounds for termination of the data integration at any time, and is at the discretion of the HMIS Lead Agency. The CoC Board will be notified of any data integrations that have been terminated.
- h. The HMIS Lead Agency will provide an estimate for implementation and maintenance fees upon receiving the appropriate data integration request form. If the CoC Board chooses not to cover these fees, the Requesting Agency will be responsible for the fees. Fees will be updated annually by the HMIS Lead Agency, and an annual invoice will be sent for costs of the continuation of data integrations services and support.
- i. The Requesting Agency and Outside Database Vendor must agree to the Roles and Responsibilities outlined in this policy as applicable.
- j. Approved data integration projects will be scheduled to accommodate the current workload of the HMIS Lead. Scheduling is at the discretion of the HMIS Lead.
- k. A critical component of data integration is understanding the responsibilities of those involved in the process. The following participants may be involved in the data integration process. Review the Roles and Responsibilities tables below for the expected responsibilities for each participant. The responsibilities are subject to change and will be finalized when the project plan for the data integration is developed.
  - a. Requesting Agency: The Provider that is serving clients directly, and is the responsible party for the data. If the Requesting Agency is requesting a data import, the agency must be participating in HMIS, and must be in compliance with all policies and procedures outlined in this document. If the agency is not already participating in HMIS and does not meet the criteria outlined in the Agency Access section, the agency must submit the Agency Access Application and be approved to access HMIS prior to submitting the Data Import/Export Request Form.
  - b. Outside Database Vendor: The entity that provides the technical and administrative support for the ~~outside database~~database being integrated with HMIS. This entity will not be given direct access to HMIS.

| Importing Data into HMIS                                                                                 |                                        |
|----------------------------------------------------------------------------------------------------------|----------------------------------------|
| Task                                                                                                     | Responsibility                         |
| Submit Data Integration Request Form                                                                     | Requesting Agency                      |
| Determine specifications of import into HMIS (frequency, parameters, data elements, format, etc.)        | HMIS Lead Agency and Requesting Agency |
| Develop project plan                                                                                     | HMIS Lead Agency                       |
| Review privacy and consent practices for outside database to ensure client consent to share data in HMIS | HMIS Lead Agency                       |

### Item 3. Attachment C.

#### Orange County HMIS Policies and Procedures

|                                                                                          |                                        |
|------------------------------------------------------------------------------------------|----------------------------------------|
| Review outside database for proper collection of HUD required data and/or custom data    | HMIS Lead Agency                       |
| Data mapping normalization meeting facilitated by the HMIS Lead Agency                   | HMIS Lead Agency and Requesting Agency |
| Data normalized and mapped to operational elements in HMIS                               | Requesting Agency                      |
| Data mapping review                                                                      | HMIS Lead Agency and Requesting Agency |
| Prepare data in approved format                                                          | Requesting Agency                      |
| Review prepared data for accuracy and completeness                                       | Requesting Agency                      |
| Submit prepared data to HMIS Lead Agency in approved submission process                  | Requesting Agency                      |
| Review data from Requesting Agency for proper format and completeness                    | HMIS Lead Agency                       |
| Complete import of data into HMIS                                                        | HMIS Lead Agency                       |
| Review imported data in HMIS and review accuracy and completeness                        | Requesting Agency                      |
| Report any data imported incorrectly to HMIS Lead Agency                                 | Requesting Agency                      |
| Resolve any issues with import file and/or requesting database and resend data as needed | Requesting Agency                      |
| Resolve any issues with HMIS import and re-upload data as needed                         | HMIS Lead Agency                       |

| Exporting Data from HMIS                                                                                                         |                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| Task                                                                                                                             | Responsibility                                                   |
| Submit Data Integration Request Form                                                                                             | Requesting Agency                                                |
| Determine specifications of export from HMIS (frequency, parameters, data elements, format, etc.)                                | Outside Database Vendor, HMIS Lead Agency, and Requesting Agency |
| Develop project plan                                                                                                             | HMIS Lead Agency                                                 |
| Represent and warrant software is in compliance with best practice policies for privacy and security practices                   | Outside Database Vendor                                          |
| Represent and warrant software is in compliance with best practice policies for access roles and data sharing                    | Outside Database Vendor                                          |
| Represent and warrant software is in compliance with best practice policies for data storage and security infrastructure         | Outside Database Vendor                                          |
| Review entities that will have access to the data in the outside database to ensure compliance with HMIS Policies and Procedures | HMIS Lead Agency                                                 |
| Ensure HMIS Consent Form and related documents name outside database for transparency                                            | HMIS Lead Agency                                                 |
| Export data from HMIS as needed                                                                                                  | HMIS Lead Agency                                                 |
| Import data into outside database                                                                                                | Outside Database Vendor                                          |

### Item 3. Attachment C.

#### Orange County HMIS Policies and Procedures

|                                                                    |                                              |
|--------------------------------------------------------------------|----------------------------------------------|
| Review imported data in outside database for accuracy/completeness | Outside Database Vendor/Requesting Agency    |
| Notify HMIS Lead Agency of any errors with export data             | Outside Database Vendor or Requesting Agency |
| Resolve any issues with HMIS export and resend data as needed      | HMIS Lead Agency                             |
| Resolve any issues with outside database import as needed          | Outside Database Vendor                      |



# OC HMIS Participating Agency Agreement

## Purpose

The HMIS (Homeless Management Information System) is a HUD-mandated information technology system that is designed to capture client-level information over time, on the characteristics and service needs of homeless persons. Client data is maintained on a central server, which will contain all client information in an encrypted state. HMIS integrates data information from all homeless service providers and organizations in the community, subject to applicable federal and state laws, client consent requirements, HMIS Policies and Procedures, and applicable data sharing restrictions, and captures basic descriptive information on every person served. Participation in the Orange County HMIS (OC HMIS) allows organizations to share information with other participating organizations to create a more coordinated and effective service delivery system. The OC HMIS is the secured electronic database for Orange County and is a valuable resource for local communities.

## Agreement and Understanding

This Agreement authorizes this Participating Agency (Agency) to designate HMIS Users ("Users") to access the OC HMIS on behalf of the Agency. A User is an individual authorized by the Agency and approved by 211OC to access the OC HMIS and who has been staff person entrusted to enter Protected Personal Information (PPI) into the OC HMIS, on behalf of this Agency. Users may include employees, contractors, or other individuals authorized by the Agency and approved in accordance with OC HMIS Policies and Procedures. The Agency is responsible for ensuring that each User has a legitimate business need for HMIS access, completes required training, signs the applicable HMIS User Agreement, and complies with all applicable confidentiality, privacy, security, and data use requirements. In order to allow a User to access the OC HMIS, a The signed User Agreement must be signed by the User and stored electronically in the HMIS.

## Confidentiality and Informed Consent

**Confidentiality:** This Agency must require all Users to abide by its organization's policies and procedures; uphold all privacy protection standards established by the OC HMIS Policies and Procedures; and comply with all relevant federal and sState of California confidentiality laws and regulations that protect client records.

### Item 3. Attachment D.

Except where otherwise ~~provided for~~ permitted or required by law, ~~this the~~ Agency shall ensure that confidential client information is disclosed with records are released with the client's written consent.

**Written Consent:** ~~To obtain written consent, p~~ Prior to each client's initial assessment, the Agency shall inform the each client that the Agency collects must be informationed that the client's information will be entered that is entered into the Orange County Homeless Management Information System (OC HMIS), an electronic database used to support the delivery, coordination, administration, and reporting of homeless services. called HMIS. The Agency shall explain the purpose of collecting the client's information, how the information may be used and shared, and the client's rights and choices regarding the sharing terms of the Consent to Share Protected Personal Information (PPI), consistent with the OC HMIS Privacy Notice, Cconsent to Shared Protected Personal Information form, and OC HMIS Policies and Procedures.

Clients who authorized the sharing of their PPI through the OC HMIS must provide consent by signing the Cconsent to Sshare Protected Personal Information form. The Agency shall ensure that client has an opportunity to ask questions and that consent is obtained voluntarily and without coercion.

~~form must also be explained to each client. Clients who agree to have their PPI entered into the OC HMIS must sign the Consent to Share Protected Personal Information form.~~

If the client declines to authorize the sharing of oes not give consent to share their PPI, the Agency shall follow the applicable OC HMIS Policies and Procedure for restricted access records. The Agency may enter the client's iidentifying information can still be entered into HMIS for authorized purposes, and the information will be restricted in accordance with the client's status and applicable OC HMIS Policies and Procedures. but the record will only be visible to the agency entering the data.

**Verbal Consent:** Verbal consent to enter Protected Personal Information (PPI) into the OC HMIS may be obtained during circumstances where written consent is not reasonably practicable, including such as phone screenings, street outreach, or community access center sign-ins. Before obtaining verbal consent, the Each client must be informed that their information will be entered into the HMIS database and must be provided an explanation of the. The terms of the Consent to Share Protected Personal Information requirements form.

The Agency shall document the date and, method and substance of the client's verbal consent in accordance with OC HMIS Policies and Procedures. Verbal consent may only be used when permitted by law, HUD requirements, and OC HMIS Policies and Procedures

~~form must also be explained to each client. The client's written consent must be obtained once the client appears for their initial assessment, and their HMIS update the client's HMIS record and consent status must be updated accordingly.~~

### Client's Rights

The client has a right to receive a copy of this Agency Agreement at the time of request.

Upon written request, eEach client has the right to requesteceive the following information or records. Subject to applicable law and OC HMIS Policies and Procedure, the Agency shall respond to the request within ,no later than ten (10) business days of a written request:

### Item 3. Attachment D.

- A correction of inaccurate or incomplete PPI;
- A copy of the client's ~~if~~ consent form;
- A copy of the client's ~~or~~ HMIS records;
- A current list of participating agencies authorized to ~~that have~~ access to HMIS data, as applicable.

### Data Use

This Agency must protect HMIS data by ensuring that:

- ~~Maintaining a~~ An accessible A link to the current OC HMIS Privacy Notice is available on the Agency's ~~is accessed from the Organization's website.~~
- ~~Ensuring that a~~ Access to the OC HMIS is limited to authorized Users with a legitimate business need to access the system. ~~not accessible to unauthorized users~~
- ~~Ensuring that~~ OC HMIS is only accessed through Agency approved devices that meet applicable OC HMIS security requirements. ~~by computers approved by the Organization~~
- ~~Ensuring that a~~ All HMIS Users complete ~~are~~ training regarding user responsibilities and conduct.
- ~~Ensuring that~~ HMIS Users sign and comply with the OC HMIS User Agreement.
- ~~Ensuring~~ HMIS Users forward a copy of a client's Revocation of Consent to the HMIS System Administrator/Lead, Orange County United Way (OCUW)'s 2-1-1 Orange County (211OC), within three (3) business days of receipt.

### Responsibilities

As outlined in the 2004 HUD Data and Technical Standards, this Agency is responsible for ~~to~~ ensuring that:

- The Notice Regarding Collection of Personal Information is posted at each intake desk or comparable location.
- HMIS Users do not misuse the system.
- Any breach of the a client's PPI that the agency discovers or is made aware of is reported to the client.
- Any HMIS User who finds-identifies a possible security lapse in ~~on~~ the system must ~~is obligated to~~ immediately report it to 211OC/the HMIS Lead.
- A signed copy of the Consent to Share Protected Personal Information is retained for a period of seven (7) years after the PPI was created or last changed ~~modified~~.

### Rights and Privileges

OC HMIS data is stored in one central database and is managed by 211OC/the HMIS Lead. While each agency owns it's ~~their~~ own data within the database, the Orange County Continuum of Care (CoC) may release aggregate data about the CoC's own continuum at the program, sub-regional, and regional level. Aggregate data may be released without organization's the Agency's permission at the discretion of the CoC continuum. Use of Access to the OC HMIS is a privilege granted and is assigned and managed by 211OC/the HMIS Lead.

### Copyright

The OC HMIS and other CoC-provided software are protected by copyright and are ~~may not to~~ be copied, except as permitted by law or under a ~~by~~ contract with the copyright owner ~~of the copyright~~. The number and distribution of copies of any CoC provided software are at the sole discretion of 211OC/the HMIS Lead.

## Violations

Any violations or suspected violations of any of the terms and conditions of this agreement, the HMIS User Agreement, ~~and/or~~ the HMIS Policies and Procedures, must be immediately and confidentially reported to ~~211~~OC the HMIS Lead and the Executive Director or other authorized representative of this Agency.

## Term

This Participating Agency Agreement shall become ~~s~~ effective on the date of final execution below and shall remain in effect unless terminated pursuant to ~~paragraph XI. (the Amendment and Termination)~~, section below.

## Amendment and Termination

- The ~~OC~~ CoC reserves the right to amend this Agreement by providing ~~a three(3)-business days'~~ written notice to this Agency.
- Either party has the right to terminate this Agreement, with or without cause, upon ~~by providing a~~ three (3)-days' written notice to the other party.
- If this Agreement is terminated, this Agency shall no longer have access to HMIS or any information contained therein. The CoC shall retain the right to use all client data previously entered by this Agency, subject to any restrictions requested by the client.

All agencies that sign this Agreement and are granted access to the OC HMIS agree to ~~abide~~ comply with the ~~by~~ OC HMIS' Policies and Procedures. The signature of the Executive Director or other authorized representative of this Agency indicates acceptance of all terms and conditions set forth in this agreement.

This Agreement is executed by and between the CoC and the Participating Organization. Upon final execution, this Agency will be given access to the OC HMIS.

Agency Name

\_\_\_\_\_  
Executive Director/Authorized Representative Name  
(Print)

\_\_\_\_\_  
Executive Director/Authorized Representative Signature

\_\_\_\_\_  
Date



# OC HMIS Participating Agency Agreement

## Purpose

The HMIS (Homeless Management Information System) is a HUD-mandated information technology system that is designed to capture client-level information over time, on the characteristics and service needs of homeless persons. Client data is maintained on a central server, which will contain all client information in an encrypted state. HMIS integrates information from all homeless service providers and organizations in the community, subject to applicable federal and state laws, client consent requirements, HMIS Policies and Procedures, and applicable data sharing restrictions.. Participation in the Orange County HMIS (OC HMIS) allows organizations to share information with other participating organizations to create a more coordinated and effective service delivery system. The OC HMIS is the secured electronic database for Orange County and is a valuable resource for local communities.

## Agreement and Understanding

This Agreement authorizes this Participating Agency (Agency) to designate HMIS users ("Users") to access the OC HMIS on behalf of the Agency. A User is an individual authorized by the Agency to access the OC HMIS and who has been entrusted to enter Protected Personal Information (PPI) on behalf of this Agency. Users may include employees, contractors, or other individuals authorized by the Agency and approved in accordance with OC HMIS Policies and Procedures. The Agency is responsible for ensuring that each User has a legitimate business need for HMIS access, completes required training, signs the applicable HMIS User Agreement, and complies with all applicable confidentiality, privacy, security, and data use requirements. The signed User Agreement must be stored electronically in the HMIS.

## Confidentiality and Informed Consent

**Confidentiality:** This Agency must require all Users to abide by its organization's policies and procedures; uphold all privacy protection standards established by the OC HMIS Policies and Procedures; and comply with all relevant federal and state of California confidentiality laws and regulations that protect client records. Except where otherwise permitted or required by law, the Agency shall ensure that confidential client information is disclosed with the client's written consent.

**Written Consent:** Prior to each client's initial assessment, the Agency shall inform the client that the Agency collects information that is entered into the OC HMIS, an electronic database used to support the delivery, coordination, administration, and reporting of homeless services.. The Agency shall explain the purpose of collecting the client's information, how the information may be used and shared, and the client's rights and choices regarding the sharing of PPI, consistent with the OC HMIS Privacy Notice, Consent to Share Protected Personal Information form, and OC HMIS Policies and Procedures.

### Item 3. Attachment E.

Clients who authorized the sharing of their PPI through the OC HMIS must provide consent by signing the Consent to Share Protected Personal Information form. The Agency shall ensure that client has an opportunity to ask questions and that consent is obtained voluntarily and without coercion.

If the client declines to authorize the sharing of their PPI, the Agency shall follow the applicable OC HMIS Policies and Procedure for restricted access records. The Agency may enter the client's identifying information into HMIS for authorized purposes, and the information will be restricted in accordance with the client's status and applicable OC HMIS Policies and Procedures.

**Verbal Consent:** Verbal consent to enter PPI into the OC HMIS may be obtained during circumstances where written consent is not reasonably practicable, including phone screenings, street outreach, or community access center sign-ins. Before obtaining verbal consent, the client must be informed that their information will be entered into the HMIS database and must be provided an explanation of the Consent to Share Protected Personal Information form.

The Agency shall document the date and method of the client's verbal consent in accordance with OC HMIS Policies and Procedures. Verbal consent may only be used when permitted by law, HUD requirements, and OC HMIS Policies and Procedures.

The client's written consent must be obtained once the client appears for their initial assessment, and their HMIS record and consent status must be updated accordingly.

### Client's Rights

The client has a right to receive a copy of this Agency Agreement at the time of request.

Upon written request, each client has the right to request the following information or records. Subject to applicable law and OC HMIS Policies and Procedure, the Agency shall respond to the request within (10) business days:

- A correction of inaccurate or incomplete PPI;
- A copy of the client's consent form;
- A copy of the client's HMIS records;
- A current list of participating agencies authorized to access to HMIS data, as applicable.

### Data Use

This Agency must protect HMIS data by ensuring that:

- An accessible link to the current OC HMIS Privacy Notice is available on the Agency's website.
- Access to the OC HMIS is limited to authorized Users with a legitimate business need to access the system.
- OC HMIS is only accessed through Agency approved devices that meet applicable OC HMIS security requirements.
- All HMIS Users complete training regarding user responsibilities and conduct.
- HMIS Users sign and comply with the OC HMIS User Agreement.

### Item 3. Attachment E.

- HMIS Users forward a copy of a client's Revocation of Consent to the HMIS Lead, Orange County United Way (OCUW)'s 2-1-1 Orange County (211OC), within three (3) business days of receipt.

### Responsibilities

As outlined in the 2004 HUD Data and Technical Standards, this Agency is responsible for ensuring that:

- The Notice Regarding Collection of Personal Information is posted at each intake desk or comparable location.
- HMIS Users do not misuse the system.
- Any breach of a client's PPI that the agency discovers or is made aware of is reported to the client.
- Any HMIS User who identifies a possible security lapse in the system must immediately report it to the HMIS Lead.
- A signed copy of the Consent to Share Protected Personal Information is retained for a period of seven (7) years after the PPI was created or last modified.

### Rights and Privileges

OC HMIS data is stored in one central database and is managed by the HMIS Lead. While each agency owns its own data within the database, the Orange County Continuum of Care (CoC) may release aggregate data about the CoC at the program, subregional, and regional level. Aggregate data may be released without the Agency's permission at the discretion of the CoC. Access to the OC HMIS is a privilege granted and managed by the HMIS Lead.

### Copyright

The OC HMIS and other CoC-provided software are protected by copyright and may not be copied except as permitted by law or under a contract with the copyright owner. The number and distribution of copies of any CoC provided software are at the sole discretion of the HMIS Lead.

### Violations

Any violations or suspected violations of any of the terms and conditions of this agreement, the HMIS User Agreement, or the HMIS Policies and Procedures must be immediately and confidentially reported to the HMIS Lead and the Executive Director or other authorized representative of this Agency.

### Term

This Participating Agency Agreement shall become effective on the date below and shall remain in effect unless terminated pursuant to the Amendment and Termination section below.

### Amendment and Termination

- The CoC reserves the right to amend this Agreement by providing three(3) business days' written notice to this Agency.
- Either party has the right to terminate this Agreement, with or without cause, upon three (3)-days' written notice to the other party.

### Item 3. Attachment E.

- If this Agreement is terminated, this Agency shall no longer have access to HMIS or any information contained therein. The CoC shall retain the right to use all client data previously entered by this Agency, subject to any restrictions requested by the client.

All agencies that sign this Agreement and are granted access to the OC HMIS agree to comply with the OC HMIS Policies and Procedures. The signature of the Executive Director or other authorized representative of this Agency indicates acceptance of all terms and conditions set forth in this agreement.

This Agreement is executed by and between the CoC and the Participating Organization. Upon final execution, this Agency will be given access to the OC HMIS.

*Agency Name*

---

*Executive Director/Authorized Representative Name  
(Print)*

---

*Executive Director/Authorized Representative Signature*

---

*Date*

---

Orange County Continuum of Care Homeless Management Information System (OC HMIS)

**Note Regarding Collection of Personal Information**

**DRAFT**

We collect personal information directly from you for ~~reasons the purposes described that are discussed in-in~~ our ~~Pprivacy sStatement~~ Privacy Notice. We may be required ~~byte collect some personal information by~~ law or by organizations that provide fundings ~~to operate for~~ this program to collect certain personal information.

Additional ~~Other personal~~ information ~~maybe that we collected as necessary is important to run supportour program operations, to to~~ improve services for individuals experiencing or at-risk of homelessness ~~persons, and to better understand the needs of homeless persons~~ individuals and communities those we serve. We ~~only~~ collect only information that is necessary and we consider to be appropriate for these purposes.

A copy of the Privacy Notice is available upon request.

Orange County Continuum of Care Homeless Management Information System (OC HMIS)

**Note Regarding Collection of Personal Information**

**DRAFT**

We collect personal information directly from you for the purposes described in our [Privacy](#) Notice. We may be required by law or by organizations that provide funding for this program to collect certain personal information.

Additional information maybe collected as necessary to support program operations, to improve services for individuals experiencing or at-risk of homelessness, and to better understand the needs of individuals and communities we serve. We collect only information that is necessary and appropriate for these purposes.

A copy of the Privacy Notice is available upon request.

## Data Quality Plan for the Orange County HMIS

Ensuring high-quality data in the Orange County Continuum of Care Homeless Management Information System (OC HMIS) is crucial for understanding the scope of homelessness in our community, ~~understanding its~~assessing system performance, and determining the appropriate strategies and resources to address this problem.

The following Data Quality Plan ~~lays establishes~~ the framework, ~~establishes parameters including standards~~ and processes, and outlines individual responsibilities to improve data quality across projects within the OC HMIS. The Data Quality ~~Improvement~~ Plan includes several key concepts that determine the reliability and ~~the~~ comprehensiveness of ~~our the~~ community's data.

The key components ~~that are encompassed under the concept of data quality are of data quality in OC HMIS are~~ data completeness, ~~data bed~~ coverage, unit utilization, data timeliness, data accuracy, and data consistency. This plan is applicable to all projects participating in OC HMIS, regardless of funding source. This plan is also applicable to Victim Services Providers (VSPs) that receive Continuum of Care (CoC) or Emergency Solutions Grant (ESG) Program funds.

### Data Quality Components

#### Data Completeness

Data Completeness refers to the degree to which all required data is known and documented. ~~Bed c~~Coverage and unit utilization are both forms of completeness. Data completeness is crucial in ensuring that the data recorded ~~information~~ in the OC HMIS accurately represents the population served in projects within the community. Missing data ~~causes creates~~ information gaps that ~~are detrimental to accurate analysis can affect the accuracy of the data collected analyses completed~~ about Orange County's population experiencing or at-risk of homelessness. Additionally, missing information makes it difficult to ~~deduplicate the number of clients served in the community identify unique client records~~, which distorts ~~our the community's~~ understanding of ~~the extent those experiencing or at-risk of homelessness. to which Orange County residents experience homelessness.~~

Data completeness is achieved when all the required data elements ~~are answered have been entered~~ for all the clients enrolled in projects within the system. ~~For this purpose~~To support data completeness, Homeless Services Providers should review the *Data Completeness Reports (Appendix A)*, the *Data Quality Corrections Report (Appendix C)*, and the *Data Quality Report Cards Dashboard (Appendix E)* on a quarterly basis and should ~~strive to complete missing information per this review as best as their ability identify and address any missing information to the best of their ability.~~

There are two categories of data elements ~~used collected~~ in HMIS:

1. Universal Data Elements (UDE) - Required of all projects that participate in the OC HMIS.
2. Program Specific Data Elements (PSDE) - Requirements vary by project type and funding source.

The table below ~~shows represents~~ the current ~~d~~Data ~~c~~Completeness thresholds by project type for each ~~type~~ category of data element collected in HMIS: Universal Data Elements, Program Specific Data Elements at Entry, and Program Specific Data Elements at Exit.

| Project Type               | UDE | PSDE Entry | PSDE Exit |
|----------------------------|-----|------------|-----------|
| <b>Coordinated Entry</b>   | 95% | N/A        | N/A       |
| <b>Emergency Shelter</b>   | 98% | 96%        | 65%       |
| <b>Homeless Prevention</b> | 98% | 96%        | 95%       |

### Item 3. Attachment H.

|                                                              |     |     |     |
|--------------------------------------------------------------|-----|-----|-----|
| <b>Permanent Supportive Housing/ Other Permanent Housing</b> | 98% | 96% | 95% |
| <b>Rapid Re-Housing</b>                                      | 98% | 96% | 95% |
| <b>Services Only</b>                                         | 95% | 90% | 50% |
| <b>Street Outreach</b>                                       | 95% | 90% | 50% |
| <b>Transitional Housing</b>                                  | 98% | 96% | 95% |

Table 1: Current Data Completeness Thresholds by Project Type

#### Data-Bed Coverage

Data-Bed Coverage refers to the degree extent to which all Homeless Services Providers within the geographic coverage area of the CoC's geographic coverage area enter information about the clients served by their projects all homeless clients' information into the OC HMIS. Providers include those funded by the CoC and ESG Program, federal partner agencies, foundations, and private organizations.

Data-Bed Coverage is essential for a community's ability as it allows it to understand the full complete scope of efforts being implemented to address homelessness in Orange County that have been deployed to house Orange County's residents experiencing homelessness. Comprehensive participation in the OC HMIS enables the community to better understand the services being provided, identify gaps and areas of need, align resources and strategies, and work collectively toward the goal of preventing and ending homelessness in Orange County. It also allows the community to align efforts and work collectively towards the same goal of preventing and ending homelessness in Orange County.

Partial participation of by homeless services providers limits the CoC's ability to assess community wide performance and accurately measure progress toward ending homelessness. When providers do not participate in the OC HMIS or do not enter information for all clients served through their projects, the data available to the CoC may not represent the full scope of homelessness and homeless services within the community. in HMIS negatively affects the ability of the CoC to evaluate how the community is performing as a whole towards the goal of ending homelessness.

Data-Bed Coverage is achieved when all Homeless Services Providers of operating within the community, regardless of the funding source, do participate in the OC HMIS and enter all the information from for all clients served by the entirety of their projects into the system all applicable projects. In the OC Continuum of Care, Bed coverage data is collected and reviewed during the Housing Inventory Count (HIC) that is submitted to the Department of Housing and Urban Development (HUD) every year. The-Bed coverage information is also submitted as part of the CoC application process.

The current bed coverage goal that for Orange County has for data coverage is 85% for each project type. In order to reach that rate, partially participating and non-participating providers should be encouraged by the Continuum of Care to start collecting their information into the OC HMIS by emphasizing the benefits that using the system has for the success of their projects' operations and achievements of their goals. To support achievement of this goal, the HMIS Lead continues to discuss data integration with Providers that are not currently participating in HMIS, as well as providing education on the benefits of participation.

#### Bed-Unit Utilization

Bed-Unit utilization refers to the degree to which the total number of homeless beds and units within the OC HMIS is are recorded as occupied divided by the total number of homeless beds and units within the CoC's geographic coverage area. A bedUnit utilization percentage between 5065% and 105% is a good indicator of data quality as it is difficult to gauge the degree of quality in the system's information if the utilization rate is too low (below 5065%) or too high (105%) without a reasonable explanation.

### Item 3. Attachment H.

A proper utilization rate is important as it allows Orange County to optimize the usage of beds and units that are available for serving the homeless population. An optimal utilization rate can only be obtained when the number of beds **and units** recorded in HMIS is accurate, which requires providers to enter data into HMIS for every client they serve and exit these clients once they are no longer being served by their projects.

~~Bed and~~ Unit Utilization is reviewed for all Homeless Services Providers' projects within the CoC geographic area annually in the Housing Inventory Count submission to HUD. Additionally, agencies can review their residential projects' utilization on the Project Performance Reports (PPR) that are published by 211OC twice a year for each project type. Moreover, utilization is reviewed as part of the CoC Application. Current thresholds by Project Type are specified in the table below.

[For additional information about ~~Bed~~Unit Utilization, please review the Unit Utilization Reports knowledge base article and Project Performance Overview.](#)

| Project Type                 | Utilization |
|------------------------------|-------------|
| Emergency Shelter            | 70%         |
| Permanent Supportive Housing | 95%         |
| Other Permanent Housing      | 95%         |
| Transitional Housing         | 80%         |

Table 2: Current Utilization Thresholds by Project Type

#### Data Timeliness

Data Timeliness refers to the ~~degree extent~~ to which the data is collected **and entered** into OC HMIS **within the timeframe necessary for the information to remain current, accurate, and useful.** ~~and available when it is needed.~~ Timely data entry is ~~indispensable essential because it ensures that the information available in OC HMIS reflects the most current information about clients served by participating projects. for the good performance of the system as it ensures data recorded in HMIS is the most current information on the clients served by participating projects. Up to date information can only be achieved when the clients' data is entered in HMIS as soon as it is collected. Entering data in a timely manner can reduce human error when too much time has elapsed between data collection and data entry.~~

It is expected for users of the OC HMIS to record intake, exit, and services information in HMIS within **three calendar business days** of the client's actual Project Start, Project Exit, or Service Provision date, respectively. ~~For this purpose~~**To monitor data timeliness**, agencies should review the *Data Timeliness Reports (Appendix B)* and the *Data Timeliness* section of the *Data Quality Report Cards Dashboard (Appendix E)* so they can identify ~~how many days on the~~ average **length of time does it take** to record this data in the system for all projects. **Agencies should review these reports at least A minimum of quarterly and use the findings to establish reviews of these materials would facilitate the determination of strategies for reaching the timeliness goal of three days maximum between data collection from clients served and the data's entry into HMIS. data timeliness goal.**

#### Data Accuracy

Data accuracy refers to the degree to which data entered in HMIS represents the real information about the clients that are served in the projects contributing data to the system and the services that are provided to clients. Data accuracy depends on the client's ability to provide correct information and the intake worker's ability to document and enter the data accurately. Data accuracy in HMIS is hard to assess and measure as there is no standardized baseline of clients' accurate information.

### Item 3. Attachment H.

Given the uniqueness of each agency's operation, all providers should establish their own process for monitoring the data they contribute to the OC HMIS to verify that it reflects clients' information accurately. For this purpose, it is recommended to take into consideration the following steps:

- Establish a simple process for HMIS users to report and correct errors as they are discovered.
- Emphasize to clients and intake staff that it is preferable to enter "client doesn't know" or "data not collected" than to enter inaccurate information.
- Provide clients with access to review and correct the personal information that has been entered in HMIS.
- Ensure clients' first and last names are spelled correctly and that dates of birth are properly verified by cross checking this information on clients' identification documents when possible.

To support the specific data accuracy monitoring process that each agency establishes, Agency Administrators (AAs) should review the *Data Accuracy Dashboard (Appendix F)* in HMIS. Additionally, to assess accuracy in the system, AAs should review the data issues flagged in the *Data Quality Corrections Report (Appendix C)* and displayed in the *Data Completeness and Accuracy* section of the *Data Quality Report Cards Dashboard (Appendix E)*.

#### Data Consistency

Data consistency refers to the degree to which the data is equivalent in the way it is uniformly collected and stored among across all the Homeless Services Providers that participate in the OC HMIS. In order to have consistency in the data, all HMIS users across all agencies need to have the same understanding of what is the clients' information ~~that~~ should be collected, the interpretation of this information, and how it should be collected and entered in the OC HMIS.

Having consistency in the way the data is entered in the system is crucial as it directly affects the accuracy of the clients' information. Furthermore, different interpretations of how to ask data entry questions, or what answers to those questions mean, lead to aggregate information that cannot be correctly interpreted and presented.

In order to standardize and clarify the interpretation of the questions and response options associated with the data elements collected in HMIS, agencies should review the *Data Consistency Cheat Sheets (Appendix F)*. By studying these sheets, data entry staff will be able to have the same understanding of the information that each field is meant to collect. Additionally, HMIS users will know with certainty the impact that the responses to the data elements fields have on their projects' performance.

#### Data Quality Monitoring and Reporting Process

To promote accountability and in order to ensure a high level of data quality in OC HMIS, it is necessary to establish individual responsibilities for Participating Agencies as well as the HMIS Lead/~~System Administrators~~.

Homeless Services Providers should conduct a regular review of their data completeness, data timeliness, and data accuracy on a quarterly basis. The following section outlines the steps and specific actions to review and improve data quality in the OC HMIS. ~~This process should be completed every quarter.~~

##### Step 1: ~~211 OC~~ HMIS Lead sends Data Quality Corrections to Agency Administrators

- ~~211 OC~~ HMIS Lead generates the *Data Quality Correction Report* for all active projects in the OC HMIS using data from for the previous quarter.
- ~~211 OC~~ HMIS Lead sends ~~Agency Administrators~~ the *Data Quality Correction Report to Agency Administrators*, which The report flags dData cCompleteness and aAccuracy errors across fields associated with the Universal Data Elements (UDE) for active enrollments during the previous quarter.

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### Step 2: Agencies correct missing data/errors in HMIS

- Agencies ~~complete enter~~ missing information ~~where possible~~ and make appropriate corrections to ~~the~~ clients' enrollment ~~records~~ in HMIS ~~according to the DQ errors highlighted in the~~ based on the data quality errors identified in the Data Quality Corrections Report.
- Agencies review the *Data Quality Corrections Reference Guide* ~~to see for~~ a description of the data quality errors ~~highlighted identified~~ in the report and ~~see instructions on how to correct for~~ correcting identified data issues.
- Victim Service Providers send ~~211OC~~ Data Quality Exports ~~to the HMIS Lead of that include~~ active enrollments in their projects during the previous quarter.

### Step 3: ~~211OC~~ HMIS Lead runs and publishes Data Quality Report Cards

- ~~211OC~~ HMIS Lead generates and publishes the *Data Quality Report Cards Dashboard* which assesses ~~d~~Data ~~c~~ompleteness, data accuracy, and data timeliness for active enrollments during the previous quarter ~~in all the across all~~ projects participating in the OC HMIS.
- The *Data Quality Report Cards Dashboard* includes the percentage of data errors and valid responses for each UDE by project, the Average Data Completeness Score for each project, and the average number of days it takes agencies to record intake, exit, and services information in HMIS for each project.

In preparation for the data quality monitoring and reporting process, Agency Administrators are expected ~~to should~~ utilize the additional reports and tools ~~that made available by the HMIS Lead 211OC has made available~~ to regularly review the data quality in their projects. These reports and tools are ~~explained further described in~~ greater detail in the appendices of this document and are also outlined in the *OC HMIS Data Quality Tools* document.

## Quarterly Due Dates

The following table specifies the timeframe for each step ~~in of~~ the Data Quality (DQ) Monitoring and Reporting Process.

| Quarters         | Step 1<br><del>211OC</del> HMIS Lead<br><del>sends</del> DQ Corrections<br>to Agency<br>Administrators | Step 2<br>Agencies correct DQ<br>errors and missing<br>information in HMIS | Step 3<br><del>211OC</del> HMIS Lead<br>publishes Data Quality<br>Report Cards |
|------------------|--------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| Q1: 1/1 – 3/31   | April 5 <sup>th</sup>                                                                                  | April 18 <sup>th</sup>                                                     | April 30 <sup>th</sup>                                                         |
| Q2: 4/1/ – 6/30  | July 5 <sup>th</sup>                                                                                   | July 18 <sup>th</sup>                                                      | July 30 <sup>th</sup>                                                          |
| Q3: 7/1/ – 9/30  | October 5 <sup>th</sup>                                                                                | October 18 <sup>th</sup>                                                   | October 30 <sup>th</sup>                                                       |
| Q4: 10/1 – 12/31 | January 5 <sup>th</sup>                                                                                | January 18 <sup>th</sup>                                                   | January 30 <sup>th</sup>                                                       |

Table 3: Generic Quarterly Due Dates

The date will be changed to the first business day after dates that fall on a holiday or weekend

## Incentives and Enforcements

This section describes the actions that the Orange County CoC will take ~~in order to incentivize to recognize~~ agencies ~~to have that maintain~~ high data quality, and ~~to provide the~~ interventions ~~and support needed to assist~~ projects that ~~have not been able to do not~~ meet the established data quality thresholds. The implementation of incentives and enforcements will allow the HMIS Lead to ~~prioritize the identify~~ projects that ~~need to be assisted with~~ may benefit from additional technical support.

### Incentives

The following recognition measures may be used to acknowledge agencies that consistently meet established data quality standards:

- Agencies with projects that meet the established data quality thresholds for all four quarters in the calendar year will be ~~shared with~~ reported to the CoC Board and recognized
- ~~Agencies with projects that met data quality thresholds for all four quarters in the calendar year will be published on the~~ echmis.org OC HMIS website.

### Enforcements and Technical Assistance

The following interventions will be used to address projects that do not meet established data quality standards:

- Projects with at least four data elements under 80% in any quarter will ~~receive be identified for~~ technical support from ~~211OC the~~ HMIS Lead.
- Projects targeted for technical support in 4-four consecutive quarters will be shared with the CoC Board.
- If an agency applies for funding administered or approved by the CoC Board and has projects targeted for technical support in at least four4 consecutive quarters, the agency will be required to address the identified data quality issues as part of in their application.
- Projects ~~targeted that have been identified~~ for technical ~~support assistance~~ in four4 consecutive quarters that are not receiving funding that requires HMIS participation will be reviewed by the Agency Access Working Group to determine ~~the appropriateness of the project's continued HMIS participation whether continuing participation in OC HMIS is appropriate.~~ Projects ~~removed whose HMIS access was revoked from HMIS~~ may re-apply for HMIS access after three months.

## Appendices

### Appendix A: Data Completeness Reports

Completeness reports assess the degree to which all required data elements are answered in HMIS for all the clients to whom these data elements apply. ~~It is recommended for~~ Homeless Services Providers are encouraged to run and review Completeness Reports quarterly ~~in order~~ to identify incomplete or missing information. The following reports are located in the Reports ~~p~~Page of HMIS, under the Data Analysis tab ~~in the~~ Data Quality section.

- Universal Data Elements (UDE) Completeness Report:  
This report shows ~~the~~ client responses to the UDE defined by HUD in the [HMIS Data Standards](#). These data elements are required to be collected by all projects participating in the OC HMIS, regardless of funding source.
- Common Program Specific Data Elements (PSDE) Reports:
  - PSDE at Entry Completeness Report:  
This report shows ~~the~~ client responses to the Common PSDE at Project Entry defined by HUD in the [HMIS Data Standards](#). These data elements are collected across most HMIS Federal Partner programs at the start of the clients' enrollments.
  - PSDE at Exit Completeness Report:  
This report shows ~~the~~ client responses to the Common PSDE at Project Exit defined by HUD in the [HMIS Data Standards](#). These data elements are collected across most HMIS Federal Partner programs at the end of the clients' enrollments.
- Federal Partner Program Specific Data Elements:  
The following reports show the client responses to the data elements developed by each Federal Partner and defined by HUD in [the HMIS Federal Partner Programs Manual](#). These data elements can be limited to one or two federal partner programs or a single component of one of the Federal Partner programs.
  - [Housing Opportunities for Persons With AIDS \(HOPWA\)](#) Specific Data Elements:  
This report shows ~~the~~ client responses to the Federal Program Specific Data Elements that ~~need to~~ must be collected by HOPWA funded projects as defined in the [HOPWA Program HMIS Manual](#).
  - [Projects for Assistance in Transition from Homelessness \(PATH\)](#) Specific Data Elements  
This report shows ~~the~~ client responses to the Federal Program Specific Data Elements that ~~need to~~ must be collected by PATH funded projects as defined in the [PATH Program HMIS Manual](#).
  - [Runaway and Homeless Youth \(RHY\)](#) Specific Data Elements  
This report shows ~~the~~ client responses to the Federal Program Specific Data Elements ~~that need to~~ that must be collected by RHY funded projects as defined in the [RHY Program HMIS Manual](#).
  - [Veterans Affairs \(VA\)](#) Specific Data Elements  
This report shows ~~the~~ client responses to the Federal Program Specific Data Elements that ~~need to~~ must be collected by VA funded projects as defined in the [VA Program HMIS Manual](#).

### Appendix B: Data Timeliness Reports

Timeliness reports show the time it takes for Homeless Services Providers to record intake, exit, and services information in the OC HMIS for each ~~project on a client level~~. Reports are also aggregated for each project to determine average data timeliness. It is recommended that these report be run and reviewed these reports every quarterly in preparation for the publication of the Data Quality Report Cards ~~publication~~. The following reports are located ~~on~~ the Reports ~~p~~Page of HMIS, under the Data Analysis tab ~~in the~~ Data Quality section.

- Project Start Data Timeliness Report:  
This report shows the number of days taken to record between Project Start Date and the date the data was entered into HMIS for each client enrollment.
- Services Data Timeliness Report:  
This report shows the number of days taken to record Services data between the Service Date and the date the data was entered into HMIS for each client enrollment service.
- Project Exit Data Timeliness Report:  
This report shows the number of days taken to record between Project Exit Date and the date the data was entered into HMIS for each client enrollment.

### Appendix C: Data Quality Corrections Report

This report is sent quarterly by ~~211OC~~ the HMIS Lead to all Homeless Services Providers that participate in the OC HMIS. The report flags Data Completeness and Data Accuracy errors across fields associated with the Universal Data Elements (UDE) for all projects. These errors are identified according to the HMIS Reporting Terminology Glossary released by HUD.

There are three types of errors highlighted in the report:

- Client doesn't know/Client Refused/prefers not to answer, highlighted in orange
  - Agencies are encouraged to review responses for data accuracy. Responses indicating that the cClient doesn't know or client prefers not to answer are considered missing data. This will impact agency's overall data quality. Agencies are encouraged to continue to build rapport with the client and explain why the HMIS data elements are collected. a deeper engagement with clients may lead to more rapid movement off the street and placement in housing.
- Missing Information, highlighted in gray
- Data Issues, highlighted in magenta

Agency Administrators should review this report, identify all the errors flagged for their projects, and complete and/or correct the appropriate fields for the appropriate client enrollments in HMIS. To identify data quality errors in the *Data Quality Correction Report*, each column in the spreadsheet should be filtered by the colors associated with each type of error. The filtering process pinpoints the exact responses that present errors as well as the clients that present these errors. Additionally, to facilitate the correction process Agency Administrators should review the Data Quality Corrections Reference Guide explained in the next appendix.

### Appendix D: Data Quality Corrections Reference Guide

The Data Quality Corrections Reference Guide is available in the HMIS Data Quality section of the OC HMIS website. This guide describes what constitutes a data completeness and accuracy error for all the Universal Data Elements fields on the *Data Quality Corrections Report (Appendix C)*. Data completeness errors include responses such as client doesn't know, client refused/prefers not to answer, data not collected, and unanswered fields. Data

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accuracy issues include responses that are not valid for each data element according to the [HUD Data Standards](#), as well as responses that ~~present~~ contain data incongruences.

#### Appendix E: Data Quality Report Cards Dashboard

The data quality report cards are published quarterly by ~~211OC~~ the HMIS Lead. They are available on the [HMIS Data Quality Report Cards](#) page on the OC HMIS website. This dashboard assesses ~~d~~ Data ~~c~~ Completeness, ~~d~~ Data ~~a~~ Accuracy and ~~d~~ Data ~~t~~ Timeliness for all the projects participating in the OC HMIS. The Data Quality Report Cards are published after agencies make revisions and corrections on their data using the Data Quality Corrections Report.

The first tab of the dashboard, Data Completeness and Accuracy, shows the percentage of data errors and valid responses for each Universal Data Element (UDE) by project. A response is considered valid when it is in accordance with the HUD Data Standards and it is different from “Client doesn’t know”, “Client ~~Refused~~ Prefers not to a Answer”, and “Data not ~~c~~ Collected.” This tab also shows the Average Data Completeness Score for each project, which is a unique indicator of data completeness for each project, calculated by dividing the total valid responses that the project has across all the Universal Data Elements by the total clients that need an answer to each UDE.

The second tab of the dashboard, Data Timeliness, shows the average number of days it takes for ~~H~~ Homeless ~~S~~ Service ~~P~~ providers to record intake, exit, and services information in HMIS for each project. The client-level data that contribute to the average timeliness calculations can be reviewed by the Agency Administrators by running the Data Timeliness Reports (See Appendix B).

#### Appendix F: Data Accuracy Dashboard

The Data Accuracy Dashboard is available to Agency Administrators in HMIS. Agency Administrators should review this dashboard monthly for all projects ~~at~~ within their agency ~~in order~~ to identify and correct any client information that is not truthful or accurate. It is important for Agency Administrators to share the dashboard information with all case managers and data intake staff ~~that~~ who are familiar with the client information of each project, so they can identify and report any data in the dashboard that ~~doesn't coincide with the real information of the~~ does not reflect the client's actual information-clients they serve.

#### Appendix G: Data Consistency Cheat Sheets

The following Data Consistency Cheat Sheets are available on the [OC HMIS website](#). They provide a detailed explanation of critical data elements that ~~need to be collected by the~~ Homeless Services Providers need to collect.

- **HMIS Data Element Cheat Sheet: Profile Creation and Enrollment:**  
This sheet ~~provides~~ gives guidance on how to collect and record client intake and project enrollment information in a standardized and consistent manner. It provides further explanation on the definition of intake and enrollment questions and their response options. Additionally, it offers case managers questions they can use as guides ~~to help collect~~ when collecting certain data elements.
- **HMIS Data Element Cheat Sheet: Exiting, Annual, and Status Assessments:**  
This sheet ~~gives~~ provides guidance on how to collect client status updates and exit information in a standardized and consistent manner. It provides further explanation on the definition of the assessment and exit questions and their response options. It also provides clarification on how to collect Project Exit Date and Destination by project type and lists examples of various scenarios.

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- HMIS Data Elements and Reporting Guide:

This sheet explains ~~the way in which each~~ how each data element affects ~~project level and system-wise reports~~ reporting in the OC HMIS. It specifies the performance measure in which each data element is used and how missing or inaccurate data can ~~yield result in~~ data issues.

#### Appendix H: Sample Agency Data Quality Plan

The Sample Agency Data Quality Plan is a foundation for OC HMIS participating agencies to build upon based on your agency's commitment to comply with the OC HMIS policies for Participating Agency Requirements and contractual reporting requirements.

Please review the Sample Agency Data Quality Plan on the OC HMIS Website.

DRAFT

## Data Quality Plan for the Orange County HMIS

Ensuring high-quality data in the Orange County Continuum of Care Homeless Management Information System (OC HMIS) is crucial for understanding the scope of homelessness in our community, assessing system performance, and determining the appropriate strategies and resources to address this problem.

The following Data Quality Plan establishes the framework, including standards and processes, and outlines individual responsibilities to improve data quality across projects within the OC HMIS. The Data Quality Plan includes several key concepts that determine the reliability and comprehensiveness of the community's data.

The key components of data quality in OC HMIS are data completeness, bed coverage, unit utilization, data timeliness, data accuracy, and data consistency. This plan is applicable to all projects participating in OC HMIS, regardless of funding source. This plan is also applicable to Victim Services Providers (VSPs) that receive Continuum of Care (CoC) or Emergency Solutions Grant (ESG) Program funds.

### Data Quality Components

#### Data Completeness

Data Completeness refers to the degree to which all required data is known and documented. Bed coverage and unit utilization are both forms of completeness. Data completeness is crucial in ensuring that the data recorded in the OC HMIS accurately represents the population served in projects within the community. Missing data creates information gaps that can affect the accuracy of analyses completed about Orange County's population experiencing or at-risk of homelessness. Additionally, missing information makes it difficult to identify unique client records, which distorts the community's understanding of those experiencing or at-risk of homelessness.

Data completeness is achieved when all the required data elements have been entered for all the clients enrolled in projects within the system. To support data completeness, Homeless Services Providers should review the *Data Completeness Reports (Appendix A)*, the *Data Quality Corrections Report (Appendix C)*, and the *Data Quality Report Cards Dashboard (Appendix E)* on a quarterly basis and should identify and address any missing information to the best of their ability.

There are two categories of data elements collected in HMIS:

1. Universal Data Elements (UDE) - Required of all projects that participate in the OC HMIS.
2. Program Specific Data Elements (PSDE) - Requirements vary by project type and funding source.

The table below represents the current data completeness thresholds by project type for each category of data element collected in HMIS: Universal Data Elements, Program Specific Data Elements at Entry, and Program Specific Data Elements at Exit.

| Project Type                                                     | UDE | PSDE Entry | PSDE Exit |
|------------------------------------------------------------------|-----|------------|-----------|
| <b>Coordinated Entry</b>                                         | 95% | N/A        | N/A       |
| <b>Emergency Shelter</b>                                         | 98% | 96%        | 65%       |
| <b>Homeless Prevention</b>                                       | 98% | 96%        | 95%       |
| <b>Permanent Supportive Housing/<br/>Other Permanent Housing</b> | 98% | 96%        | 95%       |
| <b>Rapid Re-Housing</b>                                          | 98% | 96%        | 95%       |
| <b>Services Only</b>                                             | 95% | 90%        | 50%       |
| <b>Street Outreach</b>                                           | 95% | 90%        | 50%       |
| <b>Transitional Housing</b>                                      | 98% | 96%        | 95%       |

## Item 3. Attachment I.

Table 1: Current Data Completeness Thresholds by Project Type

### Bed Coverage

Bed Coverage refers to the extent to which Homeless Services Providers within the geographic coverage area of the CoC enter information about the clients served by their projects into the OC HMIS.

Bed Coverage is essential for a community's ability to understand the full scope of efforts being implemented to address homelessness in Orange County.. Comprehensive participation in the OC HMIS enables the community to better understand the services being provided, identify gaps and areas of need, align resources and strategies, and work collectively toward the goal of preventing and ending homelessness in Orange County.

Partial participation by homeless services providers limits the CoC's ability to assess community wide performance and accurately measure progress toward ending homelessness. When providers do not participate in the OC HMIS or do not enter information for all clients served through their projects, the data available to the CoC may not represent the full scope of homelessness and homeless services within the community.

Bed Coverage is achieved when all Homeless Services Providers operating within the community, regardless of the funding source, participate in the OC HMIS and enter information for all clients served by all applicable projects. Bed coverage is reviewed during the Housing Inventory Count (HIC) that is submitted to the Department of Housing and Urban Development (HUD) every year. Bed coverage information is also submitted as part of the CoC application process.

The current bed coverage goal for Orange County is 85% for each project type. To support achievement of this goal, the HMIS Lead continues to discuss data integration with Providers that are not currently participating in HMIS, as well as providing education on the benefits of participation.

### Unit Utilization

Unit utilization refers to the degree to which the total number of homeless beds and units within the OC HMIS are recorded as occupied divided by the total number of homeless beds and units within the CoC's geographic coverage area. Unit utilization between 65% and 105% is a good indicator of data quality as it is difficult to gauge the degree of quality in the system's information if the utilization rate is too low (below 65%) or too high (105%) without a reasonable explanation.

A proper utilization rate is important as it allows Orange County to optimize the usage of beds and units that are available for serving the homeless population. An optimal utilization rate can only be obtained when the number of beds and units recorded in HMIS is accurate, which requires providers to enter data into HMIS for every client they serve and exit these clients once they are no longer being served by their projects.

Unit Utilization is reviewed for all Homeless Services Providers' projects within the CoC geographic area annually in the Housing Inventory Count submission to HUD. Additionally, agencies can review their residential projects' utilization on the Project Performance Reports (PPR) that are published by 211OC twice a year for each project type. Moreover, utilization is reviewed as part of the CoC Application. Current thresholds by Project Type are specified in the table below.

For additional information about Unit Utilization, please review the [Unit Utilization Reports](#) knowledge base article and [Project Performance Overview](#).

| Project Type      | Utilization |
|-------------------|-------------|
| Emergency Shelter | 70%         |

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|                              |     |
|------------------------------|-----|
| Permanent Supportive Housing | 95% |
| Other Permanent Housing      | 95% |
| Transitional Housing         | 80% |

Table 2: Current Utilization Thresholds by Project Type

#### Data Timeliness

Data Timeliness refers to the extent to which the data is collected and entered into OC HMIS within the timeframe necessary for the information to remain current, accurate, and useful. . Timely data entry is essential because it ensures that the information available in OC HMIS reflects the most current information about clients served by participating projects. .

It is expected for users of the OC HMIS to record intake, exit, and services information in HMIS within **three business days** of the client's actual Project Start, Project Exit, or Service Provision date, respectively. To monitor data timeliness, agencies should review the *Data Timeliness Reports (Appendix B)* and the *Data Timeliness* section of the *Data Quality Report Cards Dashboard (Appendix E)* so they can identify the average length of time it takes to record this data in the system for all projects. Agencies should review these reports at least quarterly and use the findings to establish strategies for reaching the data timeliness goal.

#### Data Accuracy

Data accuracy refers to the degree to which data entered in HMIS represents the real information about the clients that are served in the projects contributing data to the system and the services that are provided to clients. Data accuracy depends on the client's ability to provide correct information and the intake worker's ability to document and enter the data accurately. Data accuracy in HMIS is hard to assess and measure as there is no standardized baseline of clients' accurate information.

Given the uniqueness of each agency's operation, all providers should establish their own process for monitoring the data they contribute to the OC HMIS to verify that it reflects clients' information accurately. For this purpose, it is recommended to take into consideration the following steps:

- Establish a simple process for HMIS users to report and correct errors as they are discovered.
- Emphasize to clients and intake staff that it is preferable to enter "client doesn't know" or "data not collected" than to enter inaccurate information.
- Provide clients with access to review and correct the personal information that has been entered in HMIS.
- Ensure clients' first and last names are spelled correctly and that dates of birth are properly verified by cross checking this information on clients' identification documents when possible.

To support the specific data accuracy monitoring process that each agency establishes, Agency Administrators (AAs) should review the *Data Accuracy Dashboard (Appendix F)* in HMIS. Additionally, to assess accuracy in the system, AAs should review the data issues flagged in the *Data Quality Corrections Report (Appendix C)* and displayed in the *Data Completeness and Accuracy* section of the *Data Quality Report Cards Dashboard (Appendix E)*.

#### Data Consistency

Data consistency refers to the degree to which the data is uniformly collected and stored across all the Homeless Services Providers that participate in the OC HMIS. In order to have consistency in the data, all HMIS users across all agencies need to have the same understanding of what information should be collected, the interpretation of this information, and how it should be collected and entered in OC HMIS.

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## Data Quality Monitoring and Reporting Process

To promote accountability and ensure a high level of data quality in OC HMIS, it is necessary to establish individual responsibilities for Participating Agencies as well as the HMIS Lead.

Homeless Services Providers should conduct a regular review of their data completeness, data timeliness, and data accuracy on a quarterly basis. The following section outlines the steps and specific actions to review and improve data quality in the OC HMIS.

### Step 1: HMIS Lead sends Data Quality Corrections to Agency Administrators

- HMIS Lead generates the *Data Quality Correction Report* for all active projects in the OC HMIS using data from the previous quarter.
- HMIS Lead sends the *Data Quality Correction Report* to Agency Administrators. The report flags data completeness and accuracy errors across fields associated with the Universal Data Elements (UDE) for active enrollments during the previous quarter.

### Step 2: Agencies correct missing data/errors in HMIS

- Agencies enter missing information and make appropriate corrections to clients enrollment records in HMIS based on the data quality errors identified in the *Data Quality Corrections Report*.
- Agencies review the *Data Quality Corrections Reference Guide* for a description of the data quality errors identified in the report and instructions for correcting identified issues.
- Victim Service Providers send Data Quality Exports to the HMIS Lead that include active enrollments in their projects during the previous quarter.

### Step 3: HMIS Lead runs and publishes Data Quality Report Cards

- HMIS Lead generates and publishes the *Data Quality Report Cards Dashboard* which assesses data completeness, data accuracy, and data timeliness for active enrollments during the previous quarter across all projects participating in the OC HMIS.
- The *Data Quality Report Cards Dashboard* includes the percentage of data errors and valid responses for each UDE by project, the Average Data Completeness Score for each project, and the average number of days it takes agencies to record intake, exit, and services information in HMIS for each project.

In preparation for the data quality monitoring and reporting process, Agency Administrators are expected to utilize the additional reports and tools made available by the HMIS Lead to regularly review the data quality in their projects. These reports and tools are described in greater detail in the appendices of this document and are also outlined in the *OC HMIS Data Quality Tools* document.

## Quarterly Due Dates

The following table specifies the timeframe for each step of the Data Quality (DQ) Monitoring and Reporting Process.

### Item 3. Attachment I.

| Quarters         | Step 1<br>HMIS Lead sends DQ<br>Corrections to Agency<br>Administrators | Step 2<br>Agencies correct DQ<br>errors and missing<br>information in HMIS | Step 3<br>HMIS Lead publishes<br>Data Quality Report<br>Cards |
|------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------|---------------------------------------------------------------|
| Q1: 1/1 – 3/31   | April 5 <sup>th</sup>                                                   | April 18 <sup>th</sup>                                                     | April 30 <sup>th</sup>                                        |
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The date will be changed to the first business day after dates that fall on a holiday or weekend

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This section describes the actions that the Orange County CoC will take to recognize agencies that maintain high data quality, and to provide interventions and support to projects that do not meet the established data quality thresholds. The implementation of incentives and enforcements will allow the HMIS Lead to identify projects that may benefit from additional technical support.

### Incentives

The following recognition measures may be used to acknowledge agencies that consistently meet established data quality standards:

- Agencies with projects that meet the established data quality thresholds for all four quarters in the calendar year will be reported to the CoC Board and recognized on the [OC HMIS website](#).

### Enforcements and Technical Assistance

The following interventions will be used to address projects that do not meet established data quality standards:

- Projects with at least four data elements under 80% in any quarter will be identified for technical support from the HMIS Lead.
- Projects targeted for technical support in four consecutive quarters will be shared with the CoC Board.
- If an agency applies for funding administered or approved by the CoC Board and has projects targeted for technical support in at least four consecutive quarters, the agency will be required to address the identified data quality issues as part of their application.
- Projects that have been identified for technical assistance in four consecutive quarters that are not receiving funding that requires HMIS participation will be reviewed by the Agency Access Working Group to determine whether continuing participation in OC HMIS is appropriate. Projects whose HMIS access was revoked may re-apply for HMIS access after three months.

## Appendices

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Completeness reports assess the degree to which all required data elements are answered in HMIS for all the clients to whom these data elements apply. Homeless Services Providers are encouraged to run and review Completeness Reports quarterly to identify incomplete or missing information. The following reports are located in the Reports page of HMIS, under the Data Analysis tab in the Data Quality section.

- **Universal Data Elements (UDE) Completeness Report:**  
This report shows client responses to the UDE defined by HUD in the [HMIS Data Standards](#). These data elements are required to be collected by all projects participating in the OC HMIS, regardless of funding source.
- **Common Program Specific Data Elements (PSDE) Reports:**
  - **PSDE at Entry Completeness Report:**  
This report shows client responses to the Common PSDE at Project Entry defined by HUD in the [HMIS Data Standards](#). These data elements are collected across most HMIS Federal Partner programs at the start of the clients' enrollments.
  - **PSDE at Exit Completeness Report:**  
This report shows client responses to the Common PSDE at Project Exit defined by HUD in the [HMIS Data Standards](#). These data elements are collected across most HMIS Federal Partner programs at the end of the clients' enrollments.
- **Federal Partner Program Specific Data Elements:**  
The following reports show the client responses to the data elements developed by each Federal Partner and defined by HUD in [the HMIS Federal Partner Programs Manual](#). These data elements can be limited to one or two federal partner programs or a single component of one of the Federal Partner programs.
  - **Housing Opportunities for Persons With AIDS (HOPWA) Specific Data Elements:**  
This report shows client responses to the Federal Program Specific Data Elements that must be collected by HOPWA funded projects as defined in the [HOPWA Program HMIS Manual](#).
  - **Projects for Assistance in Transition from Homelessness (PATH) Specific Data Elements**  
This report shows client responses to the Federal Program Specific Data Elements that must be collected by PATH funded projects as defined in the [PATH Program HMIS Manual](#).
  - **Runaway and Homeless Youth (RHY) Specific Data Elements**  
This report shows client responses to the Federal Program Specific Data Elements that must be collected by RHY funded projects as defined in the [RHY Program HMIS Manual](#).
  - **Veterans Affairs (VA) Specific Data Elements**  
This report shows client responses to the Federal Program Specific Data Elements that must be collected by VA funded projects as defined in the [VA Program HMIS Manual](#).

### Appendix B: Data Timeliness Reports

Timeliness reports show the time it takes for Homeless Services Providers to record intake, exit, and services information in the OC HMIS for each client. Reports are also aggregated for each project to determine average data timeliness. It is recommended that these report be run and reviewed quarterly in preparation for the

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publication of the Data Quality Report Cards. The following reports are located on the Reports page of HMIS, under the Data Analysis tab in the Data Quality section.

- [Project Start Data Timeliness Report](#):  
This report shows the number of days between Project Start Date and the date the data was entered into HMIS for each client enrollment.
- [Services Data Timeliness Report](#):  
This report shows the number of days between the Service Date and the date the data was entered into HMIS for each service.
- [Project Exit Data Timeliness Report](#):  
This report shows the number of days between Project Exit Date and the date the data was entered into HMIS for each client enrollment.

### Appendix C: Data Quality Corrections Report

This report is sent quarterly by the HMIS Lead to all Homeless Services Providers that participate in the OC HMIS. The report flags Data Completeness and Data Accuracy errors across fields associated with the Universal Data Elements (UDE) for all projects. These errors are identified according to the [HMIS Reporting Terminology Glossary released by HUD](#).

There are three types of errors highlighted in the report:

- Client doesn't know/Client prefers not to answer, highlighted in orange
  - Agencies are encouraged to review responses for data accuracy. Responses indicating that the client doesn't know or prefers not to answer are considered missing data. This will impact agency's overall data quality. Agencies are encouraged to continue to build rapport with the client and explain why the HMIS data elements are collected.
- Missing Information, highlighted in gray
- Data Issues, highlighted in magenta

Agency Administrators should review this report, identify all the errors flagged for their projects, and complete and/or correct the appropriate fields for the appropriate client enrollments in HMIS. To identify data quality errors in the *Data Quality Correction Report*, each column in the spreadsheet should be [filtered by the colors](#) associated with each type of error. The filtering process pinpoints the exact responses that present errors as well as the clients that present these errors. Additionally, to facilitate the correction process Agency Administrators should review the Data Quality Corrections Reference Guide explained in the next appendix.

### Appendix D: Data Quality Corrections Reference Guide

The [Data Quality Corrections Reference Guide](#) is available in the HMIS Data Quality section of the OC HMIS website. This guide describes what constitutes a data completeness and accuracy error for all the Universal Data Elements fields on the *Data Quality Corrections Report (Appendix C)*. Data completeness errors include responses such as client doesn't know, client prefers not to answer, data not collected, and unanswered fields. Data accuracy issues include responses that are not valid for each data element according to the [HUD Data Standards](#), as well as responses that contain data incongruences.

### Appendix E: Data Quality Report Cards Dashboard

The data quality report cards are published quarterly by the HMIS Lead. They are available on the [HMIS Data Quality Report Cards](#) page on the OC HMIS website. This dashboard assesses data completeness, data accuracy

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and data timeliness for all the projects participating in the OC HMIS. The Data Quality Report Cards are published after agencies make revisions and corrections on their data using the Data Quality Corrections Report.

The first tab of the dashboard, Data Completeness and Accuracy, shows the percentage of data errors and valid responses for each Universal Data Element (UDE) by project. A response is considered valid when it is in accordance with the HUD Data Standards and it is different from “Client doesn’t know”, “Client prefers not to answer”, and “Data not collected.” This tab also shows the Average Data Completeness Score for each project, which is a unique indicator of data completeness for each project, calculated by dividing the total valid responses that the project has across all the Universal Data Elements by the total clients that need an answer to each UDE.

The second tab of the dashboard, Data Timeliness, shows the average number of days it takes for Homeless Service Providers to record intake, exit, and services information in HMIS for each project. The client-level data that contribute to the average timeliness calculations can be reviewed by the Agency Administrators by running the Data Timeliness Reports (See Appendix B).

### Appendix F: Data Accuracy Dashboard

The Data Accuracy Dashboard is available to Agency Administrators in HMIS. Agency Administrators should review this dashboard monthly for all projects within their agency to identify and correct any client information that is not truthful or accurate. It is important for Agency Administrators to share the dashboard information with all case managers and data intake staff who are familiar with the client information of each project, so they can identify and report any data in the dashboard that does not reflect the client’s actual information.

### Appendix G: Data Consistency Cheat Sheets

The following Data Consistency Cheat Sheets are available on the [OC HMIS website](#). They provide a detailed explanation of critical data elements that Homeless Services Providers need to collect.

- **HMIS Data Element Cheat Sheet: Profile Creation and Enrollment:**  
This sheet provides guidance on how to collect and record client intake and project enrollment information in a standardized and consistent manner. It provides further explanation on the definition of intake and enrollment questions and their response options. Additionally, it offers case managers questions they can use as guides when collecting certain data elements.
- **HMIS Data Element Cheat Sheet: Exiting, Annual, and Status Assessments:**  
This sheet provides guidance on how to collect client status updates and exit information in a standardized and consistent manner. It provides further explanation on the definition of the assessment and exit questions and their response options. It also provides clarification on how to collect Project Exit Date and Destination by project type and lists examples of various scenarios.
- **HMIS Data Elements and Reporting Guide:**  
This sheet explains how each data element affects reporting in the OC HMIS. It specifies the performance measure in which each data element is used and how missing or inaccurate data can result in data issues.

### Appendix H: Sample Agency Data Quality Plan

The Sample Agency Data Quality Plan is a foundation for OC HMIS participating agencies to build upon based on your agency’s commitment to comply with the OC HMIS policies for Participating Agency Requirements and contractual reporting requirements.

Please review the Sample Agency Data Quality Plan on the OC HMIS Website.

## Sample Data Quality Plan for Agencies

The following is a sample Data Quality Plan OC HMIS Participating Agencies can use as a foundation to build their own plan that works for their needs. Agency Administrators should consider staffing capacity, the amount of data the Participating Agency has in HMIS, and contractual reporting requirements when developing their own plan. The HMIS Lead is available to assist with developing a Participating Agency's Data Quality Plan as requested.

Step 1: Develop Data Quality Monitoring Team and assign roles.

- Agency Administrators are responsible for managing the agency's data, and should lead this effort. Agency Administrators will run reports and send corrections to Program Managers.
- Program Managers or Team Leads will review corrections sent by the Agency Administrators, and assign corrections to staff.
- Staff will update data in HMIS as needed.

Step 2: Develop the Data Quality Plan.

- The following reports should be reviewed monthly.
  - Canned Reports: Reports are available on the Report Library page under the sections below.
    - Program Based Reports
      - [GNRL-220] Program Details Report – Verify enrollment, assessment and exit data has been entered correctly. Staff should review the data they entered and confirm accuracy.
  - Looker Reports/Dashboards: Reports are available on the Data Analysis page under the sections below.
    - Built In Reports
      - Data Quality Dashboard – Address any errors highlighted in each report. Review the Data Quality Dashboard article for more details.
    - Orange County Clarity System Reports
      - Data Accuracy Dashboard & Details – address any errors highlighted in each report. Review the Data Accuracy Dashboard article for more details.
- The following reports should be reviewed quarterly.
  - Review and complete quarterly data quality corrections sent by the HMIS Lead. Review email for additional information on these corrections.
  - Canned Reports: Reports are available on the Report Library page under the sections below.
    - Data Quality Reports
      - [DQXX-110] Duplicate Clients – Review client records to determine if duplicate profiles have been created for the same client. Additional

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HMIS User training around proper data collection may be needed if there are a high number of duplicate clients. HMIS Users are encouraged to review the [Searching For a Client Record Knowledge Base article](#) for additional guidance.

- Looker Reports/Dashboards: Reports are available on the Data Analysis page under the sections below.
  - Orange County Clarity System Reports
    - Agency Set-Up Review – Review the set-up of projects in HMIS, including project type, project location, bed inventory, and funding sources. This review is critical for accurate reporting. Review the [Agency Set-up Review Dashboard article](#) for additional details.

#### Step 3: Train Data Quality Monitoring Team.

- Review the Participating Agency's Data Quality Plan and incorporate any feedback.
- Review and confirm each team members' responsibilities.

#### Step 4: Implement the plan.

- Add calendar reminders when reports should be pulled, and when corrections are due.
- Provide staff two to three weeks to review and correct data in HMIS.
- Run the reports on the 1<sup>st</sup> of the month to be in alignment with HMIS Lead reporting schedule.
- When running monthly reports, review the reports to confirm that the corrections assigned the previous month have been addressed. Flag any errors that were not made for staff correction.
- For quarterly reports, run the reports after the deadline to verify all corrections have been addressed, and reissue any pending corrections.

#### Step 5: Review errors for trends and work with Data Quality Monitoring Team to develop internal training for staff to avoid common errors.

- Submit a suggestion to the HMIS Helpdesk for training topics.
- Review available training materials and share with staff.
  - Knowledge Base Library: <https://ochmis-211oc.happyfox.com/home/>
  - Data Quality Tools: <https://ochmis.org/data-quality/>
  - Trainings: <https://ochmis.org/hmis-monthly-training-webinars/>
  - Meetings: <https://ochmis.org/meetings/user-meeting-minutes/>
  - Guides: <https://ochmis.org/hmis-cheat-sheets/>

## Orange County Continuum of Care Homeless Management Information System Client Consent Form

Welcome to the Orange County Continuum of Care (CoC).

You are currently accessing services from a service provider/organization participating in the Orange County Homeless Management Information System (HMIS). HMIS is the secure database used to collect and store information about clients served through this service provider/organization. It also allows the sharing of information among HMIS participating service providers/organizations to streamline access to services and help them understand a client's history of homelessness or housing instability. HMIS is managed and operated by Orange County United Way's 2-1-1 Orange County (211OC).

In Orange County, service providers/organizations that participate in HMIS share data with each other to coordinate care and improve program outcomes. If you sign this consent form, you agree to allow information gathered by a participating service provider/organization to be shared in HMIS with other service providers/organizations that have access to HMIS. This allows other participating service providers/organizations to view and use your data to provide services to you. Additionally, the service provider/organization will also be able to see what kind of services you have received in the past in Orange County. Signing this consent form also means that your data may be included in data requests approved by the CoC Board for academic research purposes, analysis of the homeless system of care, or other purposes as deemed appropriate by the Board.

A complete list of all service providers/organizations that participate in the HMIS is maintained at <http://ochmis.org/about-hmis/contributing-agencies/>. You can also ask the service provider/organization you are receiving services from for a list of HMIS participating service providers/organizations. Please note that the list of service providers/organizations with access to HMIS can change frequently and without notice, and therefore the website should be consulted for the most recent list.

HMIS contains sensitive health and personal data. The Orange County CoC and HMIS participating service providers/organizations take your privacy very seriously and have implemented **the following protections to safeguard your data:**

- Individual client data is only viewable by trained staff at each participating service provider/organization.
- In order to participate in the HMIS, leaders at each agency must sign an Agency Agreement that includes a commitment to protecting client data and maintaining confidentiality.
- In order to use HMIS, service provider/organization staff must complete multiple trainings that examines privacy laws and the importance of client privacy.
- The HMIS is hosted on a secure server and data is encrypted.

#### **What information is shared in the HMIS database?**

We share Protected Personal Information (PPI), Protected Health Information (PHI), and general information obtained during your intake, assessment, and enrollment in the program. This may include, without limitation, the following:

- Your name and your contact information
- Your social security number and date of birth
- Your basic demographic information such as gender, race and ethnicity
- Your history of homelessness and housing (including your current housing status, and where and when you have accessed services)
- Your medical history and disabling conditions, including mental and physical health concerns, substance abuse history, and HIV/AIDS status
- Your case notes and services
- Your income sources and amounts
- Your non-cash benefits
- Your veteran status, service history and discharge status
- Information about other members of your household
- Your self-reported history of domestic violence
- Verification of history of homelessness and/or disabling conditions (including third-party verifications and/or self-attestations)
- Your photo (optional)

**By signing this form, you understand the following:**

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- You have the right to receive services even if you do not sign this consent form. Providers may not refuse to provide you with services based on your refusal to sign this form.
- You have the right to receive a copy of this consent form for your records.
- Your consent permits your data to be shared in HMIS and allows participating service providers/organizations to view your history of homelessness and service utilization. Service providers/organizations can also add to or update your information in HMIS without asking you to sign another consent form. Your consent also permits your data to be included in data requests approved by the CoC Board for academic research purposes, analysis of the homeless system of care, or other purposes deemed appropriate by the Board.
- This consent form expires seven (7) years after the signature or at any time you choose to revoke your consent. Please note, the Orange County CoC is required to retain all data stored in HMIS for seven (7) years after the data was created or last changed. However, data stored in HMIS will no longer be shared in HMIS or data requests upon the expiration of your consent, or if you revoke your consent.
- You may revoke your consent to share your information with other HMIS participating service providers/organizations at any time. Your revocation must be provided either in writing or by completing the Revocation of Consent form. The service provider/organization you are receiving services from must make this form available to you if you ask; it should be readily available to you and conspicuously posted at all participating service provider/organization locations. Upon receipt of your revocation, the HMIS Lead will ensure your record is no longer shared with service providers/organizations in the HMIS database. However, the PPI and PHI that you previously authorized to be shared cannot be entirely removed from the HMIS database. This information, as described previously, will remain accessible to the service providers/organizations that provided you with direct services.
- There are some situations where your data may be shared without consent. Participating agencies are required to post a Privacy Notice at each location where intakes are completed. The Privacy Notice contains more detailed information about how your information may be used and disclosed; it should be readily available to you and conspicuously posted at all participating service provider/organization locations. You have the right to receive a copy of this notice for your records.
- You have the right to request, in writing, the following pieces of information. This information is to be provided to you within five (5) business days of your request.
  - A correction of inaccurate or incomplete PPI and/or PHI
  - A copy of your consent form
  - A copy of your HMIS record (visit the Client Record Request page <https://ochmis.org/hmis-client-record-requests/> for more information about this process)
- Aggregate or statistical data that is released from the HMIS database will not disclose any of your PPI or PHI
- You are not waiving any rights protected under Federal and/or California law.

#### Please initial to confirm your understanding of the following:

You understand that you have the right to receive services even if you do not sign this consent form.

You understand that by signing this consent form you are consenting to share your data with other agencies participating in HMIS, and your data will be included in data requests approved by the CoC Board.

#### **SIGNATURE AND ACKNOWLEDGEMENT**

Your signature indicates that you have read (or been read) this consent form, have received answers to your questions, and you freely consent to have your information, and that of your minor children (if applicable and/or if you choose to include them), ~~entered into~~ shared in the HMIS database. ~~You also consent to share your information~~ with other participating organizations as described in this consent form.

Client Name: \_\_\_\_\_ Date Of Birth (DOB): \_\_\_\_/\_\_\_\_/\_\_\_\_

Signature: \_\_\_\_\_ Date Signed: \_\_\_\_/\_\_\_\_/\_\_\_\_

#### **Minor Children (if applicable and/or if you choose to include them):**

Name: \_\_\_\_\_ DOB: \_\_\_\_/\_\_\_\_/\_\_\_\_      Name: \_\_\_\_\_ DOB: \_\_\_\_/\_\_\_\_/\_\_\_\_

Name: \_\_\_\_\_ DOB: \_\_\_\_/\_\_\_\_/\_\_\_\_      Name: \_\_\_\_\_ DOB: \_\_\_\_/\_\_\_\_/\_\_\_\_

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**Agency Staff Signature:**

Agency Staff Name: \_\_\_\_\_ Agency Staff Signature: \_\_\_\_\_

Agency Name: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

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#### Orange County Continuum of Care Homeless Management Information System Participating Service Providers/Organizations

Please note that the list of service providers/organizations with access to HMIS can change frequently and without notice, and therefore the website should be consulted for the most recent list – <http://ochmis.org/about-hmis/contributing-agencies/>.

The following service providers/organizations are participating in the Homeless Management Information System (HMIS). These service providers/organizations have the ability to enter data into HMIS and/or view the client's information previously entered by other HMIS participating service providers/organizations, including utilization of homeless services in Orange County.

|                                |                                  |                                   |
|--------------------------------|----------------------------------|-----------------------------------|
| 1736 Family Crisis Center      |                                  |                                   |
| 211OC                          |                                  |                                   |
| A Community of Friends         |                                  |                                   |
| Abrazar, Inc.                  |                                  |                                   |
| Advanced Healthcare            |                                  |                                   |
| Administration                 |                                  |                                   |
| AltaMed Health Services        |                                  |                                   |
| American Family Housing        |                                  |                                   |
| Anaheim Housing Authority      |                                  |                                   |
| APAIT                          |                                  |                                   |
| April Parker Foundation        |                                  |                                   |
| Asian American Senior Citizens |                                  |                                   |
| Service Center                 |                                  |                                   |
| Casa Teresa                    |                                  |                                   |
| Casa Youth Shelter             |                                  |                                   |
| Celebrating Life Community     |                                  |                                   |
| Health Center                  |                                  |                                   |
| CEO Outreach and Engagement    |                                  |                                   |
| City Net                       |                                  |                                   |
| City of Anaheim                |                                  |                                   |
| City of Buena Park             |                                  |                                   |
| City of Costa Mesa             |                                  |                                   |
| City of Dana Point             |                                  |                                   |
| City of Fullerton              |                                  |                                   |
| City of Garden Grove           |                                  |                                   |
| City of Huntington Beach       |                                  |                                   |
| City of Irvine                 |                                  |                                   |
| City of La Habra               |                                  |                                   |
| City of Laguna Niguel          |                                  |                                   |
| City of Lake Forest            |                                  |                                   |
| City of Mission Viejo          |                                  |                                   |
| City of San Clemente           |                                  |                                   |
| City of San Juan Capistrano    |                                  |                                   |
| City of Stanton                |                                  |                                   |
| City of Westminster            |                                  |                                   |
|                                | Colette's Children's Home        |                                   |
|                                | Community Action Partnership of  |                                   |
|                                | Orange County                    |                                   |
|                                | County of Orange/Office of Care  |                                   |
|                                | Coordination                     |                                   |
|                                | Covenant House California        |                                   |
|                                | Encompass Housing                |                                   |
|                                | Families Forward                 |                                   |
|                                | Family Assistance Ministries     |                                   |
|                                | Family Health Matters - North    |                                   |
|                                | Orange County Regional           |                                   |
|                                | Health Foundation                |                                   |
|                                | Family Promise of Orange County  |                                   |
|                                | Friendship Shelter               |                                   |
|                                | Grandma's House of Hope          |                                   |
|                                | Health Care Agency – Housing and |                                   |
|                                | Supportive Services              |                                   |
|                                | Healthcare In Action             |                                   |
|                                | Helping HandUps                  |                                   |
|                                | HIS-OC                           |                                   |
|                                | Hope Center of Orange County     |                                   |
|                                | Housing for Health California    |                                   |
|                                | Hub Resource Center              |                                   |
|                                | Illumination Health and Home     |                                   |
|                                | Independent Living Systems       |                                   |
|                                | Irvine Valley College            |                                   |
|                                | Jamboree                         |                                   |
|                                | JMH – Anaheim Foundation         |                                   |
|                                | Korean Community Services, Inc.  |                                   |
|                                | Last Is First Philanthropies     |                                   |
|                                | Lutheran Social Services of      |                                   |
|                                | Southern California              |                                   |
|                                | Mariposa Women & Family Center   |                                   |
|                                | Mental Health Association        |                                   |
|                                |                                  | Mercy House                       |
|                                |                                  | New Directions for Veterans       |
|                                |                                  | Nurturing Care LLC                |
|                                |                                  | OC Rescue Mission                 |
|                                |                                  | One Step Ministries               |
|                                |                                  | Orange County Asian and Pacific   |
|                                |                                  | Islander Community Alliance       |
|                                |                                  | Orange County Housing Authority   |
|                                |                                  | Orange County United Way          |
|                                |                                  | People Assisting the Homeless     |
|                                |                                  | (PATH)                            |
|                                |                                  | Pathways of Hope                  |
|                                |                                  | Precious Life Shelter             |
|                                |                                  | Project Kinship                   |
|                                |                                  | Radiant Health Centers            |
|                                |                                  | Recovery Road, Inc                |
|                                |                                  | Salvation Army                    |
|                                |                                  | Santa Ana Housing Authority       |
|                                |                                  | Share Our Selves                  |
|                                |                                  | Something More, Inc               |
|                                |                                  | South County Outreach             |
|                                |                                  | Serving People In Need (SPIN)     |
|                                |                                  | StandUp for Kids                  |
|                                |                                  | The Chrysalis Center              |
|                                |                                  | The Eli Home                      |
|                                |                                  | The Orangewood Foundation         |
|                                |                                  | Thomas House                      |
|                                |                                  | US Veterans Initiative            |
|                                |                                  | VA Long Beach Healthcare System   |
|                                |                                  | Volunteers of America Los Angeles |
|                                |                                  | (VOALA)                           |
|                                |                                  | Waymakers                         |
|                                |                                  | WISEPlace                         |

The following service providers/organizations have restricted access in HMIS. This means that the service providers/organizations are limited to only entering data into HMIS are not able to view client's history, files, project enrollments, etc.

Santa Ana Police Department

### Orange County Continuum of Care Homeless Management Information System Client Consent Form

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In Orange County, service providers/organizations that participate in HMIS share data with each other to coordinate care and improve program outcomes. If you sign this consent form, you agree to allow information gathered by a participating service provider/organization to be shared in HMIS with other service providers/organizations that have access to HMIS. This allows other participating service providers/organizations to view and use your data to provide services to you. Additionally, the service provider/organization will also be able to see what kind of services you have received in the past in Orange County. Signing this consent form also means that your data may be included in data requests approved by the CoC Board for academic research purposes, analysis of the homeless system of care, or other purposes as deemed appropriate by the Board.

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HMIS contains sensitive health and personal data. The Orange County CoC and HMIS participating service providers/organizations take your privacy very seriously and have implemented **the following protections to safeguard your data:**

- Individual client data is only viewable by trained staff at each participating service provider/organization.
- In order to participate in the HMIS, leaders at each agency must sign an Agency Agreement that includes a commitment to protecting client data and maintaining confidentiality.
- In order to use HMIS, service provider/organization staff must complete multiple trainings that examines privacy laws and the importance of client privacy.
- The HMIS is hosted on a secure server and data is encrypted.

#### **What information is shared in the HMIS database?**

We share Protected Personal Information (PPI), Protected Health Information (PHI), and general information obtained during your intake, assessment, and enrollment in the program. This may include, without limitation, the following:

- Your name and your contact information
- Your social security number and date of birth
- Your basic demographic information such as gender, race and ethnicity
- Your history of homelessness and housing (including your current housing status, and where and when you have accessed services)
- Your medical history and disabling conditions, including mental and physical health concerns, substance abuse history, and HIV/AIDS status
- Your case notes and services
- Your income sources and amounts
- Your non-cash benefits
- Your veteran status, service history and discharge status
- Information about other members of your household
- Your self-reported history of domestic violence
- Verification of history of homelessness and/or disabling conditions (including third-party verifications and/or self-attestations)
- Your photo (optional)

**By signing this form, you understand the following:**

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- You have the right to receive services even if you do not sign this consent form. Providers may not refuse to provide you with services based on your refusal to sign this form.
- You have the right to receive a copy of this consent form for your records.
- Your consent permits your data to be shared in HMIS and allows participating service providers/organizations to view your history of homelessness and service utilization. Service providers/organizations can also add to or update your information in HMIS without asking you to sign another consent form. Your consent also permits your data to be included in data requests approved by the CoC Board for academic research purposes, analysis of the homeless system of care, or other purposes deemed appropriate by the Board.
- This consent form expires seven (7) years after the signature or at any time you choose to revoke your consent. Please note, the Orange County CoC is required to retain all data stored in HMIS for seven (7) years after the data was created or last changed. However, data stored in HMIS will no longer be shared in HMIS or data requests upon the expiration of your consent, or if you revoke your consent.
- You may revoke your consent to share your information with other HMIS participating service providers/organizations at any time. Your revocation must be provided either in writing or by completing the Revocation of Consent form. The service provider/organization you are receiving services from must make this form available to you if you ask; it should be readily available to you and conspicuously posted at all participating service provider/organization locations. Upon receipt of your revocation, the HMIS Lead will ensure your record is no longer shared with service providers/organizations in the HMIS database. However, the PPI and PHI that you previously authorized to be shared cannot be entirely removed from the HMIS database. This information, as described previously, will remain accessible to the service providers/organizations that provided you with direct services.
- There are some situations where your data may be shared without consent. Participating agencies are required to post a Privacy Notice at each location where intakes are completed. The Privacy Notice contains more detailed information about how your information may be used and disclosed; it should be readily available to you and conspicuously posted at all participating service provider/organization locations. You have the right to receive a copy of this notice for your records.
- You have the right to request, in writing, the following pieces of information. This information is to be provided to you within five (5) business days of your request.
  - A correction of inaccurate or incomplete PPI and/or PHI
  - A copy of your consent form
  - A copy of your HMIS record (visit the Client Record Request page <https://ochmis.org/hmis-client-record-requests/> for more information about this process)
- Aggregate or statistical data that is released from the HMIS database will not disclose any of your PPI or PHI
- You are not waiving any rights protected under Federal and/or California law.

#### Please initial to confirm your understanding of the following:

\_\_\_\_\_ You understand that you have the right to receive services even if you do not sign this consent form.

\_\_\_\_\_ You understand that by signing this consent form you are consenting to share your data with other agencies participating in HMIS, and your data will be included in data requests approved by the CoC Board.

#### SIGNATURE AND ACKNOWLEDGEMENT

Your signature indicates that you have read (or been read) this consent form, have received answers to your questions, and you freely consent to have your information, and that of your minor children (if applicable and/or if you choose to include them), shared in the HMIS database with other participating organizations as described in this consent form.

Client Name: \_\_\_\_\_ Date Of Birth (DOB): \_\_\_\_/\_\_\_\_/\_\_\_\_

Signature: \_\_\_\_\_ Date Signed: \_\_\_\_/\_\_\_\_/\_\_\_\_

#### Minor Children (if applicable and/or if you choose to include them):

Name: \_\_\_\_\_ DOB: \_\_\_\_/\_\_\_\_/\_\_\_\_      Name: \_\_\_\_\_ DOB: \_\_\_\_/\_\_\_\_/\_\_\_\_

Name: \_\_\_\_\_ DOB: \_\_\_\_/\_\_\_\_/\_\_\_\_      Name: \_\_\_\_\_ DOB: \_\_\_\_/\_\_\_\_/\_\_\_\_

### Item 3. Attachment L.

Revised 09/2026

**Agency Staff Signature:**

Agency Staff Name: \_\_\_\_\_ Agency Staff Signature: \_\_\_\_\_

Agency Name: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

## Item 3. Attachment L.

Revised 09/2026

### Orange County Continuum of Care Homeless Management Information System Participating Service Providers/Organizations

Please note that the list of service providers/organizations with access to HMIS can change frequently and without notice, and therefore the website should be consulted for the most recent list – <http://ochmis.org/about-hmis/contributing-agencies/>.

The following service providers/organizations are participating in the Homeless Management Information System (HMIS). These service providers/organizations have the ability to enter data into HMIS and/or view the client's information previously entered by other HMIS participating service providers/organizations, including utilization of homeless services in Orange County.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1736 Family Crisis Center<br>211OC<br>A Community of Friends<br>Abrazar, Inc.<br>Advanced Healthcare<br>Administration<br>AltaMed Health Services<br>American Family Housing<br>Anaheim Housing Authority<br>APAIT<br>April Parker Foundation<br>Asian American Senior Citizens<br>Service Center<br>Casa Teresa<br>Casa Youth Shelter<br>Celebrating Life Community<br>Health Center<br>CEO Outreach and Engagement<br>City Net<br>City of Anaheim<br>City of Buena Park<br>City of Costa Mesa<br>City of Dana Point<br>City of Fullerton<br>City of Garden Grove<br>City of Huntington Beach<br>City of Irvine<br>City of La Habra<br>City of Laguna Niguel<br>City of Lake Forest<br>City of Mission Viejo<br>City of San Clemente<br>City of San Juan Capistrano<br>City of Stanton<br>City of Westminster | Colette's Children's Home<br>Community Action Partnership of<br>Orange County<br>County of Orange/Office of Care<br>Coordination<br>Covenant House California<br>Encompass Housing<br>Families Forward<br>Family Assistance Ministries<br>Family Health Matters - North<br>Orange County Regional<br>Health Foundation<br>Family Promise of Orange County<br>Friendship Shelter<br>Grandma's House of Hope<br>Health Care Agency – Housing and<br>Supportive Services<br>Healthcare In Action<br>Helping HandUps<br>HIS-OC<br>Hope Center of Orange County<br>Housing for Health California<br>Hub Resource Center<br>Illumination Health and Home<br>Independent Living Systems<br>Irvine Valley College<br>Jamboree<br>JMH – Anaheim Foundation<br>Korean Community Services, Inc.<br>Last Is First Philanthropies<br>Lutheran Social Services of<br>Southern California<br>Mariposa Women & Family Center<br>Mental Health Association | Mercy House<br>New Directions for Veterans<br>Nurturing Care LLC<br>OC Rescue Mission<br>One Step Ministries<br>Orange County Asian and Pacific<br>Islander Community Alliance<br>Orange County Housing Authority<br>Orange County United Way<br>People Assisting the Homeless<br>(PATH)<br>Pathways of Hope<br>Precious Life Shelter<br>Project Kinship<br>Radiant Health Centers<br>Recovery Road, Inc<br>Salvation Army<br>Santa Ana Housing Authority<br>Share Our Selves<br>Something More, Inc<br>South County Outreach<br>Serving People In Need (SPIN)<br>StandUp for Kids<br>The Chrysalis Center<br>The Eli Home<br>The Orangewood Foundation<br>Thomas House<br>US Veterans Initiative<br>VA Long Beach Healthcare System<br>Volunteers of America Los Angeles<br>(VOALA)<br>Waymakers<br>WISEPlace |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

The following service providers/organizations have restricted access in HMIS. This means that the service providers/organizations are limited to only entering data into HMIS are not able to view client's history, files, project enrollments, etc.

Santa Ana Police Department

**Date:** October 28, 2026

**Subject:** Foster Youth to Independence (FYI) Voucher Memorandum of Understanding (MOU) with the City of Garden Grove Housing Authority

**Recommended Actions:**

- a. Approve the MOU between City of Garden Grove Housing Authority, County of Orange Social Services Agency, and the Orange County Continuum of Care (CoC) regarding the implementation of FYI Vouchers.
- b. Authorize the CoC Board Chair and the Collaborative Applicant to execute the MOU on behalf of the Orange County CoC.

**Background**

The FYI initiative makes Housing Choice Voucher (HCV) assistance available to Public Housing Agencies (PHAs) in partnership with Public Child Welfare Agencies (PCWAs). PHAs administer FYI in partnership with PCWAs that are responsible for identifying youth and certifying that they meet the FYI eligibility criteria and referring them to the PHA for determination of eligibility for HCV assistance. Under FYI, PHAs provide housing assistance on to Youth at least 18 years and not more than 24 years of age (have not reached their 25th birthday) who left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in Section 475(5)(H) of the Social Security Act and are homeless or are at risk of becoming homeless at age 16 or older.

The U.S. Department of Housing and Urban Development (HUD) awards FYI vouchers to PHAs through competitive and non-competitive processes. Due to the FYI process requiring specific partnerships and roles, a formal partnership agreement between a PHA and PCWA is required. The formal partnership agreement can be in the form of a MOU or other partnership agreements, depending on whether the FYI vouchers are obtained through the competitive or non-competitive process. HUD also encourages the PHAs to partner with their local CoC.

As such, there is a need for a MOU between the City of Garden Grove Housing Authority (GGHA), OC Social Services Agency and the Orange County CoC. Approval of the MOU will allow the GGHA to execute the implementation of FYI Vouchers. With approval of the MOU, the CoC Board is also being asked to authorize the CoC Board Chair and the Collaborative Applicant to execute the MOU on behalf of the Orange County CoC.

**Attachments**

Attachment A – Foster Youth to Independence Memorandum of Understanding with the Garden Grove Housing Authority and the Orange County Continuum of Care.

## **MEMORANDUM OF UNDERSTANDING FOSTER YOUTH TO INDEPENDENCE**

*This Memorandum of Understanding (MOU) has been created and will be entered into upon signature by and between all the following parties in relation to their request for assistance under the Foster Youth to Independence Program and the requirements of Notice PIH 2023-04. The MOU will remain active unless/until terminated.*

**CITY OF GARDEN GROVE  
GARDEN GROVE HOUSING AUTHORITY**  
11277 Garden Grove Blvd. Ste 100  
Garden Grove, CA 92843

**COUNTY OF ORANGE  
SOCIAL SERVICES AGENCY**  
500 N. State College Blvd. Suite 100  
Orange, CA 92868

**ORANGE COUNTY CONTINUUM OF CARE**  
400 W. Civic Center Drive, 3rd Floor  
Santa Ana, CA 92701

### **I. BACKGROUND**

The Foster Youth to Independence (FYI) is a U.S. Department of Housing and Urban Development (HUD) program that provides Housing Choice Voucher (HCV) assistance to eligible youth at least 18 years and not more than 24 years of age, with a history of foster care involvement and who are experiencing homelessness or at risk of experiencing homelessness.

The FYI program supports housing stability and promotes pathway to self-sufficiency through time-limited rental assistance paired with supportive services.

Administration of the FYI program requires coordination among the City of Garden Grove Garden Grove Housing Authority (hereinafter GGHA), County of Orange Social Services Agency (SSA) acting as the Public Child Welfare Agency (PCWA), and the Orange County Continuum of Care (hereinafter CoC) to identify eligible youth, facilitate referrals, and deliver services that support long-term independence.

## **II. PURPOSE**

The purpose of this non-financial MOU established between GGHA, SSA, and CoC (collectively, “the Parties”) is to provide a framework within which the Parties intend to:

- A. Demonstrate commitment to administering the FYI program in accordance with applicable HUD requirements.
- B. Establish collaboration among GGHA, SSA, and CoC, for the identification, referral, and service provision for FYI-eligible youth.
- C. Define roles and responsibilities and ensure compliance with all applicable HUD regulations, notices, and other Federal, State, and local requirements.
- D. Confirm each Parties’ agreement to comply with any FYI program evaluation efforts undertaken by HUD (or any other applicable entity), including but not limited to, compliance with evaluation protocols and data sharing requests to the extent permitted by law.
- E. Outline the structure under which the FYI program will be administered.
- F. Comply with the Fostering Stable Housing Opportunities (FSHO) amendments (Section 103 of Division Q of the Consolidated Appropriations Act, 2021 (Public Law 116-260)).

## **III. STATEMENT OF COOPERATION**

### **A. Commitment to administering the program**

The Parties agree to jointly administer the FYI program in compliance with all applicable HUD requirements, commit to ongoing coordination, timely communication, and appropriate information sharing as permitted by law, and will dedicate sufficient staff and resources to ensure effective program implementation and support for participating youths.

GGHA will administer FYI vouchers, including eligibility, issuance, and program compliance. SSA will identify and refer eligible youth. Supportive services will be provided as outlined in Paragraph VI. The CoC collaborates with GGHA and SSA to administer FYI vouchers by facilitating Coordinated Entry System (hereinafter CES) referrals for eligible youths, CES related training for staff, and supportive services. Further details of roles and responsibilities will be outlined in this MOU.

### **B. Goals and standards of success in administering the program**

The Parties share the goal of assisting FYI-eligible youth in securing and maintaining safe, stable housing and achieving long-term independence. FYI program success will be measured by:

- 1) Timely referral and processing of eligible youth;
- 2) Efficient voucher issuance and lease-up;
- 3) Increase in FYI-eligible youth participation in the Family Self-Sufficiency (FSS) Program;
- 4) Strong interagency coordination;
- 5) High rates of housing placement and retention; and
- 6) Consistent engagement in supportive services that promote self-sufficiency.

**C. Lead FYI Liaison:**

- 1) GGHA's liaison(s) may include a Senior Housing Specialist, a Housing Authority Manager, or other designee(s) as appropriate.
- 2) CoC's liaison(s) may include an Administrator, Manager, Director, or other designee(s) as appropriate.
- 3) SSA's liaison(s) may include a Senior Social Worker, Social Services Supervisor, or other designee(s) as appropriate.

**IV. YOUTH ELIGIBILITY**

The population eligible to be assisted under this agreement are youth certified by SSA as meeting the following conditions:

- Has attained at least 18 years and not more than 24 years of age (have not reached their 25<sup>th</sup> birthday);
- Has left foster care, or will leave foster care within 180 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act; and are experiencing homelessness or is at risk of becoming homeless at age 16 or older.

Eligibility is not limited to single persons. For example, pregnant and/or parenting youth are eligible to receive assistance under this notice assuming they otherwise meet eligibility requirements. If federal eligibility requirements are updated, the Parties may agree with written notice to modify the eligible population in accordance with federal eligibility requirements.

**V. HOUSING SEARCH ASSISTANCE**

As the PCWA, the Children and Family Services (CFS) Division of the SSA provides child welfare services for Orange County and may provide the following Housing Search Assistance (including in low-poverty census tracts) as appropriate.

- A. SSA's staff who work directly with the FYI-eligible youths involved in the child welfare system may connect the youths to agencies that work with landlords to secure appropriate eligible units. These agencies may include Orange County United Way (OCUW), Orangewood Foundation, or any other supportive service agency that assists youths to locate and secure housing.
- B. SSA's social workers may aid FYI-eligible youths with connecting to resources offered through the Orange County helpline and local housing organizations, such as GGHA. These resources include housing search assistance for FYI-eligible youths.
- C. SSA may aid youth in utilizing the Housing Navigation and Maintenance Program administered by the California Department of Housing and Community Development (HCD), as well as any other applicable resources as appropriate.

## **VI. SUPPORTIVE SERVICES**

SSA may provide the following supportive services to eligible youth or secure a commitment for the provision of supportive services for eligible youth as appropriate and in accordance with SSA's internal policies. GGHA will otherwise provide or secure a commitment for the provision of the below supportive services for eligible youth to be offered for a period of at least 36 months. SSA and/or GGHA may refer youth to external providers or programs for the services as appropriate. Youth will not be required to participate in these services as condition of receipt of the voucher.

- A. Basic life skills information/counseling on money management, use of credit, housekeeping, proper nutrition/meal preparation, and access to health care (e.g., doctors, medication, and mental and behavioral health services).
- B. Counseling on compliance with rental lease requirements and with HCV program participant requirements, including referrals and linkages for assistance on rental deposits, utility hook-up fees, and utility deposits.
- C. Providing such assurances to owners of rental property as are reasonable and necessary to assist a FYI-eligible youth to rent a unit with an HCV.
- D. Job preparation and attainment counseling (where to look/how to apply, dress, grooming, relationships with supervisory personnel, etc.).
- E. Educational and career advancement counseling regarding attainment of general equivalency diploma (GED); attendance/financing of education at a technical school, trade school or college; including successful work ethic and attitude models.

## **VII. PCWA RESPONSIBILITIES**

SSA will be responsible for the following activities:

- A. Have a system for identifying eligible youth within the agency's caseload and review referrals from the GGHA and third-party partners.
- B. Participate in the CoC's CES for prioritization of referrals to ensure that youth are prioritized for a FYI voucher based upon level of need and appropriateness of the intervention.
- C. Provide written certification to the GGHA that a youth is eligible.
- D. Provide or secure a commitment for the provision of required supportive services, in accordance with Paragraph VI.

## **VIII. PUBLIC HOUSING AGENCY RESPONSIBILITIES**

GGHA will be responsible for the following activities:

- A. Program Administration and Operation
  - Meeting at least quarterly with SSA and CoC.
  - Funding application and annual reporting processes.
  - FYI management in compliance with federal regulations and the GGHA Administrative Plan.

- Administration of FYI vouchers in accordance with applicable program regulations and requirements.
- As needed, revision of the GGHA Administrative Plan in accordance with applicable regulations and requirements.
- Upon award and thereafter as needed, training of SSA and CoC staff on the FYI Program and GGHA policies and procedures.
- Collaborating with SSA and CoC to develop necessary data and tracking metrics for tracking and improvement purposes.

#### B. Eligibility

- Acceptance of households certified by SSA as eligible for the FYI vouchers.
- Program briefing, which informs applicants of the program and explains the program's regulations, policies, and procedures.
- Determination of initial eligibility.
- Admission compliant with federal regulations.
- Determination of ongoing eligibility.
- Performance of Housing Quality Standards inspections.
- Calculation and issuance of Housing Assistance Payments.
- Case management of clients' rental assistance:
  - i. Navigation of the rental assistance program.
  - ii. Education on renters' responsibilities.
  - iii. Location of additional resources.
  - iv. All FYI youths are invited to enroll in the FSS program within six weeks of processing as a new admission.
  - v. Regardless of age, for up to 36 months, through GGHA's FSS/FYI Demonstration participation and per this MOU with SSA, FYI-eligible youth may receive:
    - Basic life skills information/counseling on money management, use of credit, housekeeping, proper nutrition/meal preparation, and access to health care.
    - Counseling on compliance with rental lease requirements and with HCV program participant requirements, including assistance/referrals for assistance on security deposits, utility hook-up fees, and utility deposits.
    - Assurances to owners of rental property as are reasonable and necessary to assist a FYI-eligible youth to rent a unit with an FYI voucher.
    - Job preparation and attainment counseling (where to look/how to apply, dress, grooming, relationships with supervisory personnel, etc.).
    - Educational and career advancement counseling regarding attainment of general equivalency diploma (GED); attendance/financing of education at a technical school, trade school or college; including successful work ethic and attitude models.

#### C. Housing Search Assistance (including in low-poverty census tracts)

- Upon determination of initial eligibility and at post-move, GGHA's Housing Specialist who works directly with the FYI-eligible youths will refer applicants to community partners, including but are not limited to, OCUW and the Orangewood Foundation, to

provide housing search assistance resources supportive services. These resources include unit viewings, landlord introductions, application assistance, moving costs, and security deposit assistance.

- GGHA will also provide potential unit listings as part of the briefing packet.
- D. Program Termination - Termination of rental assistance shall be based on GGHA's Administrative Plan, which can be found at <https://ggcity.org/housing-authority>.
- E. Provide or secure a commitment for the provision of required supportive services, in accordance with Paragraph VI.

## **IX. COC RESPONSIBILITIES**

CoC will be responsible for the following activities:

- A. Meeting at least quarterly with GGHA and SSA.
- B. Cooperating and assisting GGHA and SSA with administration of FYI vouchers.
- C. Utilizing the CoC's Coordinated Entry System to facilitate the prioritization and referral process for FYI-eligible youth by outreach teams and authorized access points.
- D. Identification of CoC services to be provided to families and youth who qualify for CoC program assistance utilizing existing Coordinated Entry System policies and procedures.
- E. Upon award and thereafter as needed, training of GGHA staff, SSA staff, and community partners as applicable, on CoC policies and procedures as they relate to FYI-eligible youths.

## **X. AMENDMENTS**

No alteration or variation of the terms of this MOU shall be valid unless made in writing and signed by the Parties; no oral understanding or agreement not incorporated herein shall be binding on the Parties; and no exceptions, alternatives, substitutes, or revisions are valid or binding on the Parties unless authorized by the Parties in writing.

## **XI. MOU TERMINATION**

Parties may terminate this MOU, with or without cause, without penalty, upon provision of written 90-day notice to the other Parties. Upon notice thereof, the Parties agree to cooperate with each other in the orderly transfer of service responsibilities, case records, and any other applicable documentation.

In Witness Whereof, the Parties hereto agree to the provisions as outlined in this MOU and approve this MOU to remain in effect:

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Matt West, Executive Director, Garden Grove Housing Authority Date

---

Director, County of Orange Social Services Agency Date

---

Executive Director, Orange County Continuum of Care Date

**APPROVED AS TO FORM**

---

County Counsel, County of Orange Date

**Date:** October 28, 2026

**Subject:** Homeless Management Information System (HMIS) Lead Update and Recommendation

**Recommended Actions:**

- a. Approve Orange County United Way, as the HMIS Lead, to renew their contract with Bitfocus for Clarity Human Services, the software platform utilized for HMIS in the Orange County Continuum of Care (CoC), for the term of October 30, 2026, through October 29, 2031.
- b. CoC Dashboard Update

**Background and Analysis**

**Bitfocus Contract Renewal**

As the HMIS Lead, 211 Orange County (211OC), a key service of the Orange County United Way, contracts with an HMIS vendor to allow the Orange County CoC to utilize their HMIS software. An RFP process was conducted in 2017 to select a vendor, and included community review of written submissions, financial review, reference checks, vendor demos, and vendor interviews. After this review, the community voted to select the HMIS software Clarity Human Services operated by Bitfocus. Since then, 211OC has regularly renewed contracts with Bitfocus to maintain the current HMIS software. The last renewal approved by the CoC Board was for the period 10/30/21 through 10/29/26.

211OC recommends renewing the contract with Bitfocus for the term 10/30/26 through 10/29/31 for the following reasons:

- Signing a multiple-year contract provides a cost savings, as increases within the contract term are limited to 3% per year, while increases outside of the contract term may be up to 10%.
- A five-year term provides stability while allowing the HMIS Lead to use the final 12 to 18 months to evaluate other vendors, compare capabilities, and assess transition costs.
- Renewing the current contract will support uninterrupted HMIS operations for participating agencies and avoid disruption to reporting and service coordination.
- Nearly 100 organizations have adopted the system, with established workflows, training, and operational processes in place.
- Significant time and resources have been used to implement this HMIS software for the community, including the development of trainings, knowledge base articles, reports, a data warehouse, and data integration capabilities. There would be substantial costs to recreate this infrastructure with another HMIS software.
- Bitfocus has confirmed that the contract can be exited without penalty if HUD CoC funding is lost.
- Clarity Human Services is well-established across the country, with more than 80 communities currently utilizing the software. Of the 44 CoCs in California, 29 of them (66%) are using Clarity Human Services.

### CoC Dashboard

Orange County United Way as the HMIS Lead has been working to transition existing dashboards to a new data visualization software to reduce staff time updating dashboards, allow for more flexible filtering, and allow for more regular updates to dashboards. After requesting feedback from CoC Board Leadership, the CoC Board, and the Office of Care Coordination, the CoC Dashboard has been published. The dashboard is attached, and the [published version](#) with filtering is now available on the OC HMIS website. The dashboard includes information about unique clients served in Orange County, their characteristics, and how they are moving through the system.

The CoC Dashboard in Attachment A will provide Orange County with a centralized, accessible, and actionable source of reliable data to help stakeholders better understand the scope of homelessness, identify trends and system gaps, and make informed decisions. It will strengthen efforts to secure funding, provide a more comprehensive picture of homelessness over time, and promote collaboration, accountability, and measurable progress.

Future plans for the CoC Dashboard include:

- Incorporating data from Victim Service Providers that receive CoC funds
- Creating separate tabs for data on specific project types

### Attachments

Attachment A – CoC Dashboard

## Orange County Continuum of Care: Population

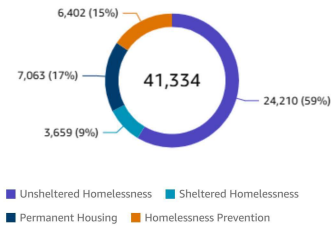
This Dashboard is an overview of people being served in the Orange County CoC, and represents people being served in Coordinated Entry, Street Outreach, Emergency Shelter, Transitional Housing, Permanent Housing, and Homelessness Prevention projects participating in HMIS. Unless otherwise noted, the charts are an unduplicated count of clients using their latest enrollment. All charts reflect data during the Reporting Period selected.

Trend charts are aggregated by month. Selecting a Reporting Period Start Date or Reporting Period End Date that does not align with the start date and end date of a month may cause inaccurate results due to incomplete data for the month.

### Housing Status

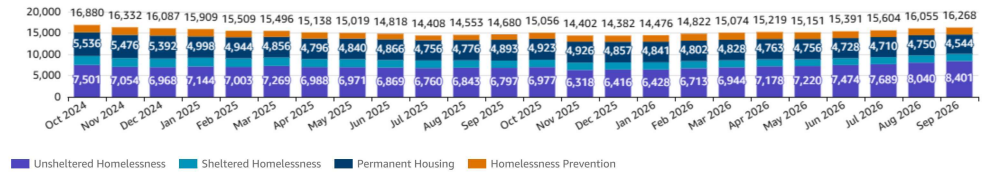
People experiencing **Unsheltered Homelessness** are living outside, in vehicles, or somewhere not safe/suitable to live, and include Street Outreach and Coordinated Entry project types. People experiencing **Sheltered Homelessness** are staying in Emergency Shelters or Transitional Housing. People in **Permanent Housing** are enrolled in Permanent Supportive Housing, Other Permanent Housing, or Rapid Re-Housing projects and are either housed or looking for housing. People in **Homelessness Prevention** are housed in a unit, but are at-risk of homelessness and require assistance to retain their housing.

#### People Served by Project Type

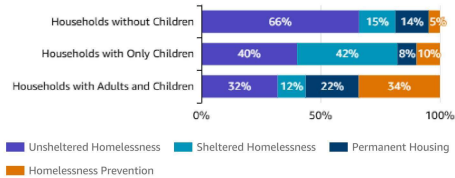


#### People Served Over Time

This chart counts clients in every month that they are active during the reporting period, and counts the latest enrollment during the month for the client. Increasing clients served over time suggests a growing population or additional resources available to serve clients, while decreasing clients served over time suggests a shrinking population or less resources available to serve clients.

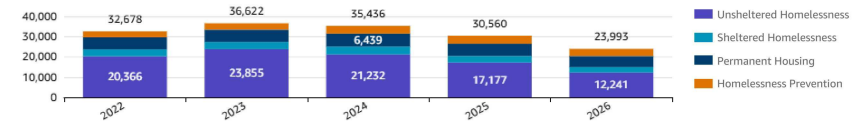


#### People Served by Household Composition



#### People Served Annually

This chart counts clients in every calendar year that they are active, and counts the latest enrollment during the year for the client. Clients in the current calendar year will appear lower because it is not a full year of data. This chart includes data for the last 5 years, and is not filterable by date.



### How is the population changing?

The insights below compare data from the previous two complete years, and describe changes in total people served and people served by housing type. The insights are dependent on the population filters selected above.

#### Change in Total People Served

Total people served in 2025 **decreased by 13.76% (-4,876)** from 2024, from 35,436 to 30,560. This decrease suggests a **declining population** of people that are at-risk or experiencing homelessness in Orange County.

#### Increases in People Served by Housing Type

Increases in sheltered and unsheltered homelessness are negative because it indicates the population experiencing literal homelessness is rising. People in these housing types usually require additional assistance to achieve housing.

People served in the following housing types increased from 2024 to 2025:

- **Homelessness Prevention increased by 3.6% (141)** from 3,915 to 4,056.

#### Decreases in People Served by Housing Type

Decreases in sheltered and unsheltered homelessness are positive because it indicates the population experiencing literal homelessness is declining.

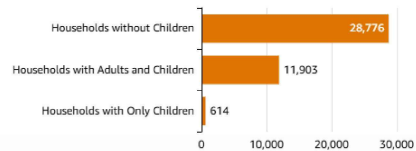
People served in the following housing types decreased from 2024 to 2025:

- **Unsheltered Homelessness decreased by 19.1% (-4,055)** from 21,232 to 17,177.
- **Sheltered Homelessness decreased by 12.65% (-487)** from 3,850 to 3,363.
- **Permanent Housing decreased by 7.38% (-475)** from 6,439 to 5,964.

### Who is being served in Orange County?

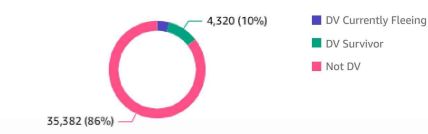
The charts below include a distinct count of clients served. Unknown responses have been excluded.

#### Household Composition

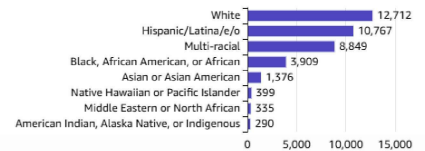


#### Domestic Violence Survivor Status

Data is self-reported by the client as of project start.



#### Race/Ethnicity

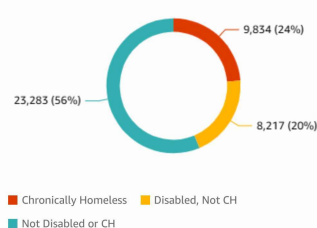


#### Disability Types at Entry

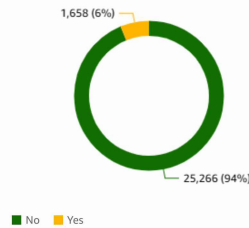
A client may report more than one disability.

|                          |        |                          |       |
|--------------------------|--------|--------------------------|-------|
| Physical Disability      | 7,967  | Developmental Disability | 4,434 |
| Chronic Health Condition | 9,258  | HIV/AIDS                 | 600   |
| Mental Health Disability | 11,813 | Substance Use Disability | 7,376 |

#### Chronically Homeless/Disabled Status

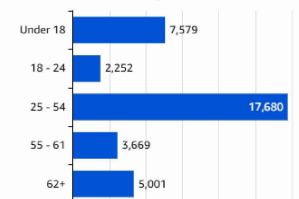


#### Veterans



#### Age Group

Reflects client's current age



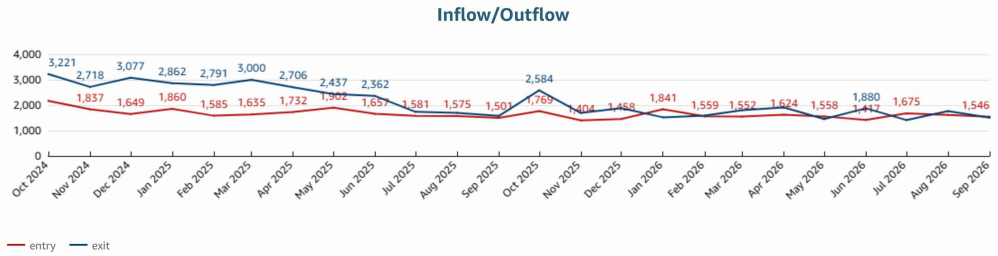
## How are people moving through the system?

Inflow/Outflow reflects the movement of clients in and out of the system of care. Each client is only counted once per month, and reflects the latest status of the client in that month. Because of this, entries and exits in this chart may not match the totals in the Living Situation and Destination charts.

**Entries** are the clients that entered the system of care during the month, and are reflected in the red line.

**Exits** are the clients that exited the system of care during the month, and are reflected in the blue line.

Months where the exit line (blue) is above the entry line (red) means that the population served is decreasing, which is an improvement for the CoC.



### Living Situation Prior to Project Entry

All project types except Homelessness Prevention should be prioritizing people experiencing homelessness prior to entry.



### Length of Stay for Exited Clients

This chart shows the average length of stay in days for clients that exited during the month, and whether or not the clients exited to permanent housing. Exits to permanent housing typically require much longer lengths of stay to coordinate care and stabilize clients in housing.



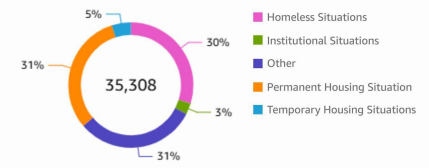
### Destination Over Time

The goal for all project types except Street Outreach is for clients to exit to permanent housing situations. Positive trends will show increasing exits to permanent housing over time, and decreasing exits to 'Other' situations.



### Destination at Exit

The largest contributor of 'Other' exits are clients that exited without completing an exit interview. These exits are highest in Emergency Shelter, Coordinated Entry, and Street Outreach projects.

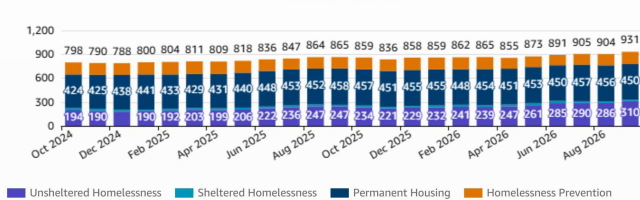


## Trends

These charts count clients in every month that they are active during the reporting period, and count the latest enrollment during the month for the client. The numbers in these charts will not match the unduplicated count of clients in other charts in this dashboard.

Increasing numbers over time suggests a growing population or additional resources available to serve clients, while decreasing numbers over time suggests a shrinking population or less resources available to serve clients.

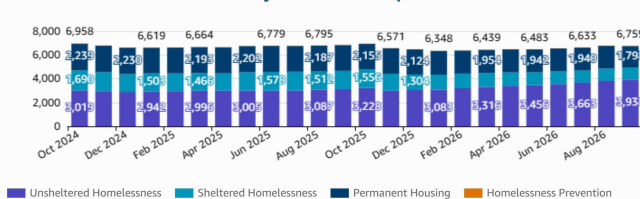
### Veterans Served



### People Served by Household Composition



### Chronically Homeless People Served



### Youth Served



Monthly data will be included on the dashboard by the 2nd day of the following month.

Last Updated Date  
10-18-2026

