

Before Starting the CoC Application

The CoC Consolidated Application consists of three parts, the CoC Application, the CoC Priority Listing, and all the CoC's project applications that were either approved and ranked, or rejected. All three must be submitted for the CoC Consolidated Application to be considered complete.

The Collaborative Applicant is responsible for reviewing the following:

1. The FY 2018 CoC Program Competition Notice of Funding Available (NOFA) for specific application and program requirements.
2. The FY 2018 CoC Application Detailed Instructions which provide additional information and guidance for completing the application.
3. All information provided to ensure it is correct and current.
4. Responses provided by project applicants in their Project Applications.
5. The application to ensure all documentation, including attachment are provided.
6. Questions marked with an asterisk (*), which are mandatory and require a response.

1A. Continuum of Care (CoC) Identification

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1A-1. CoC Name and Number: KY-501 - Louisville-Jefferson County CoC

1A-2. Collaborative Applicant Name: Coalition for the Homeless, Inc.

1A-3. CoC Designation: CA

1A-4. HMIS Lead: Coalition for the Homeless, Inc.

1B. Continuum of Care (CoC) Engagement

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1B-1. CoC Meeting Participants. For the period from May 1, 2017 to April 30, 2018, using the list below, applicant must: (1) select organizations and persons that participate in CoC meetings; and (2) indicate whether the organizations and persons vote, including selecting CoC Board members.

Organization/Person Categories	Participates in CoC Meetings	Votes, including selecting CoC Board Members
Local Government Staff/Officials	Yes	Yes
CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes
Law Enforcement	Yes	No
Local Jail(s)	Yes	Yes
Hospital(s)	Yes	No
EMS/Crisis Response Team(s)	Yes	Yes
Mental Health Service Organizations	Yes	Yes
Substance Abuse Service Organizations	Yes	Yes
Affordable Housing Developer(s)	Yes	Yes
Disability Service Organizations	Yes	Yes
Disability Advocates	Yes	No
Public Housing Authorities	Yes	Yes
CoC Funded Youth Homeless Organizations	Yes	Yes
Non-CoC Funded Youth Homeless Organizations	Yes	Yes
Youth Advocates	Yes	Yes
School Administrators/Homeless Liaisons	Yes	No
CoC Funded Victim Service Providers	Not Applicable	No
Non-CoC Funded Victim Service Providers	Yes	Yes
Domestic Violence Advocates	Yes	Yes
Street Outreach Team(s)	Yes	Yes
Lesbian, Gay, Bisexual, Transgender (LGBT) Advocates	Yes	Yes
LGBT Service Organizations	Yes	Yes
Agencies that serve survivors of human trafficking	Yes	Yes
Other homeless subpopulation advocates	Yes	Yes
Homeless or Formerly Homeless Persons	Yes	Yes
Mental Illness Advocates	Yes	Yes
Substance Abuse Advocates	Yes	Yes

Other:(limit 50 characters)		
Not Applicable	Not Applicable	No

1B-1a. Applicants must describe the specific strategy the CoC uses to solicit and consider opinions from organizations and/or persons that have an interest in preventing or ending homelessness. (limit 2,000 characters)

The Coll. App. issues quarterly invitations to participate in the CoC through social media and has a notice on our website. Staff meet with potential members throughout the year to solicit those who represent the homeless and key sub-populations and ask them to join and share their voice. CoC sub-committees also meet on veterans, the chronically homeless, youth and families. These groups invite new partners, and create needs assessments and plans to address housing and service needs. CoC reps. also attend meetings of other key sub-groups to solicit their needs including families at risk of homelessness, persons exiting prisons, LGBTQ advocates and youth employment and education groups. CoC reps. participate in Louisville’s 2040 planning and incorporate the data and interest from community members about the needs of homeless and at risk citizens. Finally, the Coll. App. hosts quarterly Saturday meetings for the formerly homeless and community volunteers that work with the homeless but cannot attend during work days. Input from all these groups is used to inform our CoC planning process, understanding of priority needs and best use of limited resources.

**1B-2.Open Invitation for New Members. Applicants must describe:
(1) the invitation process;
(2) how the CoC communicates the invitation process to solicit new members;
(3) how often the CoC solicits new members; and
(4) any special outreach the CoC conducted to ensure persons experiencing homelessness or formerly homeless persons are encouraged to join the CoC.
(limit 2,000 characters)**

(1) New CoC partners are solicited through e-news, social media and the Coll. App. website. The dates of all CoC mtgs. are shared in e-news to over 1000 community members. (2) In addition to social media, the website and weekly e-news invites, the Coll. App. staff meet with potential members all year to solicit their participation, especially those who represent key sub-pops. to invite them to participate. (3) Social media invites are sent quarterly. E-news invites are sent weekly and direct invitations happen throughout the year. (4) The CoC solicits participation from neighborhood groups and community leaders in the 12 lowest income zip code areas of opportunity. The CoC board is solicited from special sub-pops. per the Charter and homeless persons are included in the CoC membership, board, youth advisory board, veteran advisory board and outreach groups and are encouraged to represent the CoC through their voice whenever the CoC speaks publicly. This is especially true from homeless youth

through a Youth Action Board made up only of homeless young adults. Annually, notices are sent through e-news, the website and social media about the opportunity for any agency (including new participants) to submit for CoC funding. Any applicants, new or existing can get assistance in completing the proposal through the Coll. App.

1B-3.Public Notification for Proposals from Organizations Not Previously Funded. Applicants must describe how the CoC notified the public that it will accept and consider proposals from organizations that have not previously received CoC Program funding, even if the CoC is not applying for new projects in FY 2018, and the response must include the date(s) the CoC publicly announced it was open to proposals. (limit 2,000 characters)

On July 2, 2018, The Louisville CoC solicited renewal and new proposals through a pre-application to all parties attending the monthly CoC meeting. On July 9, 2018 the request for applications was posted on our website. This same request was posted on Facebook on July 10, 2018 and emailed to all developers and providers on the CoC email list on July 30 with a reminder of the August 18 deadline on August 13. The notice stated that the CoC was soliciting new projects as well as renewal requests from eligible entities regardless of past participation in the CoC and asked that the pre-application be completed and returned via email to the Collaborative applicant by August 18, 2018. It also provided a contact for technical assistance in completing an application. Both new and renewal proposals were submitted and ranked. All were submitted by the deadline.

1C. Continuum of Care (CoC) Coordination

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1C-1. CoCs Coordination, Planning, and Operation of Projects. Applicants must use the chart below to identify the federal, state, local, private, and other organizations that serve individuals, families, unaccompanied youth, persons who are fleeing domestic violence who are experiencing homelessness, or those at risk of homelessness that are included in the CoCs coordination, planning, and operation of projects.

Entities or Organizations the CoC coordinates planning and operation of projects	Coordinates with Planning and Operation of Projects
Housing Opportunities for Persons with AIDS (HOPWA)	Yes
Temporary Assistance for Needy Families (TANF)	Yes
Runaway and Homeless Youth (RHY)	Yes
Head Start Program	Yes
Funding Collaboratives	Yes
Private Foundations	Yes
Housing and services programs funded through U.S. Department of Justice (DOJ) Funded Housing and Service Programs	Yes
Housing and services programs funded through U.S. Health and Human Services (HHS) Funded Housing and Service Programs	Yes
Housing and service programs funded through other Federal resources	Yes
Housing and services programs funded through State Government	Yes
Housing and services programs funded through Local Government	Yes
Housing and service programs funded through private entities, including foundations	Yes
Other:(limit 50 characters)	

1C-2. CoC Consultation with ESG Program Recipients. Applicants must describe how the CoC:

- (1) consulted with ESG Program recipients in planning and allocating ESG funds; and**
 - (2) participated in the evaluating and reporting performance of ESG Program recipients and subrecipients.**
- (limit 2,000 characters)**

(1) The Coll. App. meets quarterly with the sole ESG recipient in our area, Metro Louisville, to look at community need, set priorities, establish scoring and ranking and address collaborative efforts. A CoC board representative sits on the ESG review team and an ESG recipient representative sits on the CoC

board and membership and participates in scoring CoC proposals. (2) The Coll. App. works with the ESG recipient to create program reports and outcome reports in order to evaluate performance. The Coll. App. and ESG recipient use these outcomes to consider future funding and address TA needs. The Coll. App. collaborates with Metro Louisville in the development of the Consolidated Plan, providing homeless need data, PIT and HIC numbers. They also provide HMIS sub-population and need data as well as data on outcomes. Finally, the Coll. App. reviews and comments on the Consolidated Plan draft when it is posted for comment and recommends program and policy changes per program outcomes.

1C-2a. Providing PIT and HIC Data to Consolidated Plan Jurisdictions. Did the CoC provide Point-in-Time (PIT) and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions within its geographic area? Yes to both

1C-2b. Providing Other Data to Consolidated Plan Jurisdictions. Did the CoC provide local homelessness information other than PIT and HIC data to the jurisdiction(s) Consolidated Plan(s)? Yes

1C-3. Addressing the Safety Needs of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Survivors. Applicants must describe:

(1) the CoC’s protocols, including the existence of the CoC’s emergency transfer plan, that prioritizes safety and trauma-informed, victim-centered services to prioritize safety; and
(2) how the CoC maximizes client choice for housing and services while ensuring safety and confidentiality.
(limit 2,000 characters)

(1) Louisville police use the best practice of fatality reviews on DV and sexual assault calls. Those at risk of death are taken to shelter lowering the number of victims dying due to violence but increasing the number of victims of violence living in general shelters. All persons seeking shelter are asked about violence vulnerabilities when they reserve a bed to help target the best option for their needs and all shelter staff are provided DV training each year (including newly adopted VAWA policies) to insure client-centered and trauma-informed referrals and services. The single point of entry staff also work closely with the victims services provider to make safe and confidential referrals per the victim service provider’s guidance. Furthermore, our CoC has an emergency transfer plan in place, in the event a tenant becomes a victim of domestic violence, dating violence, sexual assault, or stalking. The tenant may request an emergency transfer from the tenant’s current unit to another unit or geographic area. Our plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request a transfer, confidentiality protections, how a transfer may occur, and guidance to tenants on safety and security. (2) Single point of entry staff coordinate referrals with the victim services shelter to weight

the importance of safety with client choice and provide the best available shelter option. Louisville also has two emergency homes for a sex trafficking victims to provide additional choice and targeted services. To strengthen these programs, the city provides \$1.5 million in CDBG, \$50,000 in ESG and five units of RRH through ESG for victims of DV. Funding is matched through a state marriage license tax and federal DV funding. 24 units of permanent rental housing have been created for victims exiting shelter through LIHTC funding. Domestic violence victims and service staff reps. attend and vote at CoC meetings and on the Coll. App. board.

1C-3a. Applicants must describe how the CoC coordinates with victim services providers to provide annual training to CoC area projects and Coordinated Entry staff that addresses best practices in serving survivors of domestic violence, dating violence, sexual assault, and stalking. (limit 2,000 characters)

Training is provided by the victim service provider to all shelter, homeless service and coordinated entry staff on best practices (e.g. Trauma-Informed Care in addressing domestic violence, dating violence, sexual assault, stalking and sex trafficking) each year. The victim services staff also work with partner CoC agencies (including the single point of entry and common assessment) to create appropriate questions and protocols to identify, protect the confidentiality of and secure safety for any homeless person experiencing violence. All of these policies were updated to comply with federal VAWA laws in 2017.

1C-3b. Applicants must describe the data the CoC uses to assess the scope of community needs related to domestic violence, dating violence, sexual assault, and stalking, including data from a comparable database. (limit 2,000 characters)

The HMIS administrator works with the local victim services agency to coordinate de-identified aggregate data and reports from their comparable database. This data is coordinated with HMIS data to measure the number of persons who are victims of violence, assault and trafficking among the homeless as well as sub-populations of the homeless. This allows the CoC to understand the state of the need and expand or contract programs as necessary. It also allows the Coll. App. to compare local data to other communities and help the community understand the importance of trauma-informed services and confidentiality in all community services.

1C-4. DV Bonus Projects. Is your CoC No applying for DV Bonus Projects?

1C-5. PHAs within CoC. Applicants must use the chart to provide information about each Public Housing Agency (PHA) in the CoC's geographic areas:

- (1) Identify the percentage of new admissions to the Public Housing or Housing Choice Voucher (HCV) Programs in the PHA who were experiencing homelessness at the time of admission;**

**(2) Indicate whether the PHA has a homeless admission preference in its Public Housing and/or HCV Program; and
 (3) Indicate whether the CoC has a move on strategy. The information should be for Federal Fiscal Year 2017.**

Public Housing Agency Name	% New Admissions into Public Housing and Housing Choice Voucher Program during FY 2017 who were experiencing homelessness at entry	PHA has General or Limited Homeless Preference	PHA has a Preference for current PSH program participants no longer needing intensive supportive services, e.g. move on?
Louisville Metro Housing Authority	7.00%	Yes-Both	Yes

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

1C-5a. For each PHA where there is not a homeless admission preference in their written policy, applicants must identify the steps the CoC has taken to encourage the PHA to adopt such a policy. (limit 2,000 characters)

LMHA has a limited homeless preferences of housing choice vouchers for homeless veterans and a general preference for the homeless in their public housing programs. LMHA has been a great partner in addressing homelessness through set asides for homeless programs and populations. They set aside 100 vouchers for homeless veterans that do not qualify for VASH, 200 vouchers for a move on voucher program, 32 vouchers for young adults exiting foster care and entering Family Scholar House, 75 vouchers for the chronically homeless, 35 vouchers for disabled homeless persons, 25 vouchers for homeless women experiencing substance abuse and 10 vouchers for homeless young adults. Although LMHA does not have a homeless preference for their housing vouchers, LMHA operates multiple site-based projects which do give preference to homeless.

1C-5b. Move On Strategy with Affordable Housing Providers. Does the CoC have a Move On strategy with affordable housing providers in its jurisdiction (e.g., multifamily assisted housing owners, PHAs, Low Income Tax Credit (LIHTC) developments, or local low-income housing programs)? Yes

Move On strategy description. (limit 2,000 characters)

The Louisville Metro Housing Authority (LMHA, the only housing authority for the Louisville CoC) set aside 200 vouchers in FY2017 for clients of permanent supportive housing who have maintained housing for at least six months, have accessed mainstream services and no longer need the intensive services of an

SHP case manager. This valuable resource has opened up CoC vouchers for new chronically homeless persons in our community and provided qualified and stabilized tenants for the housing authority. The CoC created move on policies to insure the resource is allocated to qualified persons and established a committee to approve and track those assisted.

1C-6. Addressing the Needs of Lesbian, Gay, Bisexual, Transgender (LGBT). Applicants must describe the actions the CoC has taken to address the needs of Lesbian, Gay, Bisexual, and Transgender individuals and their families experiencing homelessness. (limit 2,000 characters)

One CoC Board member is elected as a representative for the LGBTQ community. Annual training is provided to CoC providers by the local Fairness Alliance on local and national law that insures fairness to the LGBTQ community. The training also helps case managers and shelter staff learn how to be aware of practices that discriminate against the LGBTQ community as well as policies that can make an agency LGBTQ-friendly. The single point of entry that refers clients for shelter ensures clients are able to access single sex shelter based on their gender identity. Family Health Centers conducts an LGBTQ group for residents of permanent housing and homeless young adults are referred to LGBTQ programs like the Louisville Youth Group for support. Additionally, the Coalition Supporting Young Adults has researched the need and feasibility of an LGBTQ focused emergency shelter for youth and a group is now working to fund and open this facility.

1C-6a. Anti-Discrimination Policy and Training. Applicants must indicate if the CoC implemented a CoC-wide anti-discrimination policy and conducted CoC-wide anti-discrimination training on the Equal Access Final Rule and the Gender Identity Final Rule.

1. Did the CoC implement a CoC-wide anti-discrimination policy that applies to all projects regardless of funding source?	Yes
2. Did the CoC conduct annual CoC-wide training with providers on how to effectively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity (Equal Access Final Rule)?	Yes
3. Did the CoC conduct annual CoC-wide training with providers on how to effectively implement Equal Access to Housing in HUD Programs in Accordance with an Individual's Gender Identity (Gender Identity Final Rule)?	Yes

1C-7. Criminalization of Homelessness. Applicants must select the specific strategies the CoC implemented to prevent the criminalization of homelessness in the CoC's geographic area. Select all that apply.

Engaged/educated local policymakers:	<input checked="" type="checkbox"/>
Engaged/educated law enforcement:	<input checked="" type="checkbox"/>
Engaged/educated local business leaders:	<input checked="" type="checkbox"/>

Implemented communitywide plans:	<input checked="" type="checkbox"/>
No strategies have been implemented:	<input type="checkbox"/>
Other:(limit 50 characters)	
Metro Council passed an ordinance of notice	<input checked="" type="checkbox"/>
A city team works with outreach teams	<input checked="" type="checkbox"/>
	<input type="checkbox"/>

1C-8. Centralized or Coordinated Assessment System. Applicants must:
(1) demonstrate the coordinated entry system covers the entire CoC geographic area;
(2) demonstrate the coordinated entry system reaches people who are least likely to apply homelessness assistance in the absence of special outreach;
(3) demonstrate the assessment process prioritizes people most in need of assistance and ensures they receive assistance in a timely manner; and
(4) attach CoC’s standard assessment tool.
(limit 2,000 characters)

(1) The Louisville Coordinated Entry and Assessment System covers the entire CoC through a central office and a coordinated assessment team that goes to any homeless person on the streets or in shelter to complete an assessment anywhere in the county. (2) The coordinated assessment staff work with volunteers and outreach teams, community groups, police, the single point of entry and others to identify those in greatest need that may not come in for services. The mayor’s task force has created a committee that discusses the particular needs of clients that may not have been identified and the vulnerabilities that are not included in the VI-SPDAT, and Saturday quarterly meetings are held with groups that cannot attend during the week so that their referrals are not missed. (3) A VI-SPDAT is used by the common assessment team to rank all those who are homeless in Louisville. Additionally, the outreach teams, police and shelters meet through an outreach committee to rank those with the highest scores based on who is most vulnerable at that time. Once identified as next in line, the team creates a plan to find and serve that person immediately. (4) A copy of the VI-SPDAT used for assessment is attached.

1D. Continuum of Care (CoC) Discharge Planning

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1D-1. Discharge Planning–State and Local. Applicants must indicate whether the CoC has a discharge policy to ensure persons discharged from the systems of care listed are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply (note that when "None:" is selected no other system of care should be selected).

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

1D-2. Discharge Planning Coordination. Applicants must indicate whether the CoC actively coordinates with the systems of care listed to ensure persons who have resided in them longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply (note that when "None:" is selected no other system of care should be selected).

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

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

Instructions

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

1E-1. Project Ranking and Selection. Applicants must indicate whether the CoC used the following to rank and select project applications for the FY 2018 CoC Program Competition:

- (1) objective criteria;**
- (2) at least one factor related to achieving positive housing outcomes;**
- (3) a specific method for evaluating projects submitted by victim services providers; and**
- (4) attach evidence that supports the process selected.**

Used Objective Criteria for Review, Rating, Ranking and Section	Yes
Included at least one factor related to achieving positive housing outcomes	Yes
Included a specific method for evaluating projects submitted by victim service providers	Yes

1E-2. Severity of Needs and Vulnerabilities. Applicants must describe:

- (1) the specific severity of needs and vulnerabilities the CoC considered when reviewing, ranking, and rating projects; and**
- (2) how the CoC takes severity of needs and vulnerabilities into account during the review, rating, and ranking process.**

(limit 2,000 characters)

(1)The following vulnerabilities were considered when reviewing, ranking, and rating projects: Zero income at program entry, two or more disabilities at program entry, coming from a place not meant for human habitation, a history of substance abuse at program entry, and reporting a history of domestic violence.

(2)For each of the vulnerabilities described above a project received additional points during the ranking and review process for the number of program participants (or adult program participants, if applicable) demonstrating each of the vulnerable conditions described above as reported in HMIS. For each measure maximum points were awarded if 50% or more of the program participants reported the vulnerability and no points were awarded if less than 25% or the program participants reported the vulnerability

1E-3. Public Postings. Applicants must indicate how the CoC made

- public:**
- (1) objective ranking and selection process the CoC used for all projects (new and renewal);**
 - (2) CoC Consolidated Application—including the CoC Application, Priority Listings, and all projects accepted and ranked or rejected, which HUD required CoCs to post to their websites, or partners websites, at least 2 days before the CoC Program Competition application submission deadline; and**
 - (3) attach documentation demonstrating the objective ranking, rating, and selections process and the final version of the completed CoC Consolidated Application, including the CoC Application with attachments, Priority Listing with reallocation forms and all project applications that were accepted and ranked, or rejected (new and renewal) was made publicly available, that legibly displays the date the CoC publicly posted the documents.**

Public Posting of Objective Ranking and Selection Process		Public Posting of CoC Consolidated Application including: CoC Application, Priority Listings, Project Listings	
CoC or other Website	<input checked="" type="checkbox"/>	CoC or other Website	<input checked="" type="checkbox"/>
Email	<input checked="" type="checkbox"/>	Email	<input checked="" type="checkbox"/>
Mail	<input type="checkbox"/>	Mail	<input type="checkbox"/>
Advertising in Local Newspaper(s)	<input type="checkbox"/>	Advertising in Local Newspaper(s)	<input type="checkbox"/>
Advertising on Radio or Television	<input type="checkbox"/>	Advertising on Radio or Television	<input type="checkbox"/>
Social Media (Twitter, Facebook, etc.)	<input type="checkbox"/>	Social Media (Twitter, Facebook, etc.)	<input type="checkbox"/>

1E-4. Reallocation. Applicants must indicate whether the CoC has cumulatively reallocated at least 20 percent of the CoC’s ARD between the FY 2014 and FY 2018 CoC Program Competitions.

Reallocation: No

1E-4a. If the answer is “No” to question 1E-4, applicants must describe how the CoC actively reviews performance of existing CoC Program-funded projects to determine the viability of reallocating to create new high performing projects. (limit 2,000 characters)

Projects are scored on the following items to determine inclusion and ranking. Returns to homelessness, increase in income, exits to permanent housing, number of chronically homeless that are served, HMIS data quality, amount of funding that has been recaptured, commitment to Housing First, length of stay in the project, the number of people accepted with zero income and the number of people accepted that have more than one disability. Projects that score at the lower end of the list are examined for why they scored low, how critical the service is to the community, is there someone else who could provide the service better and is there another service that the community needs more. Discussions are had with the project, the CoC Advisory Group and ultimately the board to determine the best course of action. Reallocation is pursued when the community need dictates a change in services or provider agency. If the existing agency is unable or unwilling to provide the needed changes, the CoC

Applicant informs the community of the availability of funds and the type of service the community needs. The CoC has reallocated several projects in the past and at this time has no projects that do not meet a high community need or poorly performing projects where a change is needed or financially prudent. 78% (26) of the projects are PSH or RRH, 9% (3) are Coordinated Entry, 6% (2) are HMIS, 3% (1) are TH/RRH and 3% (1) is transitional housing for young adults. The CoC's success rate for obtaining/maintaining PH was 92% in 2016 and 97% in 2017.

1E-5. Local CoC Competition. Applicants must indicate whether the CoC:
(1) established a deadline for project applications that was no later than 30 days before the FY 2018 CoC Program Competition Application deadline—attachment required;
(2) rejected or reduced project application(s)—attachment required; and
(3) notify applicants that their project application(s) were being rejected or reduced, in writing, outside of e-snaps, at least 15 days before FY 2018 CoC Program Competition Application deadline—attachment required. :

(1) Did the CoC establish a deadline for project applications that was no later than 30 days before the FY 2018 CoC Program Competition Application deadline? Attachment required.	Yes
(2) If the CoC rejected or reduced project application(s), did the CoC notify applicants that their project application(s) were being rejected or reduced, in writing, outside of e-snaps, at least 15 days before FY 2018 CoC Program Competition Application deadline? Attachment required.	Did not reject or reduce any project
(3) Did the CoC notify applicants that their applications were accepted and ranked on the Priority Listing in writing outside of e-snaps, at least 15 before days of the FY 2018 CoC Program Competition Application deadline?	Yes

2A. Homeless Management Information System (HMIS) Implementation

Intructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2A-1. Roles and Responsibilities of the CoC and HMIS Lead. Does your CoC have in place a Governance Charter or other written documentation (e.g., MOU/MOA) that outlines the roles and responsibilities of the CoC and HMIS Lead? Attachment Required. Yes

2A-1a. Applicants must: Governance Charter; pg 11 Article VII & Article VIII
(1) provide the page number(s) where the roles and responsibilities of the CoC and HMIS Lead can be found in the attached document(s) referenced in 2A-1, and
(2) indicate the document type attached for question 2A-1 that includes roles and responsibilities of the CoC and HMIS Lead (e.g., Governance Charter, MOU/MOA).

2A-2. HMIS Policy and Procedures Manual. Does your CoC have a HMIS Policy and Procedures Manual? Attachment Required. Yes

2A-3. HMIS Vender. What is the name of the HMIS software vendor? Mediware

2A-4. HMIS Implementation Coverage Area. Using the drop-down boxes, applicants must select the HMIS implementation Coverage area. Statewide HMIS (multiple CoC)

2A-5. Bed Coverage Rate. Using 2018 HIC and HMIS data, applicants must report by project type:
(1) total number of beds in 2018 HIC;
(2) total beds dedicated for DV in the 2018 HIC; and

(3) total number of beds in HMIS.

Project Type	Total Beds in 2018 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ES) beds	474	101	373	100.00%
Safe Haven (SH) beds	0	0	0	
Transitional Housing (TH) beds	244	0	208	85.25%
Rapid Re-Housing (RRH) beds	331	0	331	100.00%
Permanent Supportive Housing (PSH) beds	1,612	0	1,610	99.88%
Other Permanent Housing (OPH) beds	328	0	238	72.56%

2A-5a. To receive partial credit, if the bed coverage rate is 84.99 percent or lower for any of the project types in question 2A-5., applicants must provide clear steps on how the CoC intends to increase this percentage for each project type over the next 12 months. (limit 2,000 characters)

The bed coverage rate for other permanent housing beds is below 84.99% due to a large short-term SAMHSA CAHBI grant that was allocated to the Commonwealth of Kentucky and not through the Louisville CoC or a local service agency who participates in our HMIS. We have been able to coordinate referrals to these services and housing resources through the common assessment team and get the provider agencies to participate in prioritizing those at greatest need and cooperative services through case conferencing but the grant was not set up to include entry into HMIS. This program will end in the upcoming year.

2A-6. AHAR Shells Submission: How many 2017 Annual Housing Assessment Report (AHAR) tables shells did HUD accept? 12

2A-7. CoC Data Submission in HDX. Applicants must enter the date the CoC submitted the 2018 Housing Inventory Count (HIC) data into the Homelessness Data Exchange (HDX). (mm/dd/yyyy) 04/30/2018

2B. Continuum of Care (CoC) Point-in-Time Count

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

2B-1. PIT Count Date. Applicants must enter the date the CoC conducted its 2018 PIT count (mm/dd/yyyy). 01/24/2018

2B-2. HDX Submission Date. Applicants must enter the date the CoC submitted its PIT count data in HDX (mm/dd/yyyy). 04/30/2018

2C. Continuum of Care (CoC) Point-in-Time (PIT) Count: Methodologies

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**2C-1. Change in Sheltered PIT Count Implementation. Applicants must describe any change in the CoC’s sheltered PIT count implementation, including methodology and data quality changes from 2017 to 2018. Specifically, how those changes impacted the CoC’s sheltered PIT count results.
 (limit 2,000 characters)**

There were no changes in the Sheltered PIT Count implementation from 2017 to 2018. We have a 100% participation rate from our shelters.

2C-2. Did your CoC change its provider coverage in the 2018 sheltered count? Yes

2C-2a. If “Yes” was selected in 2C-2, applicants must enter the number of beds that were added or removed in the 2018 sheltered PIT count.

Beds Added:	145
Beds Removed:	301
Total:	-156

2C-3. Presidentially Declared Disaster Changes to Sheltered PIT Count. Did your CoC add or remove emergency shelter, transitional housing, or Safe Haven inventory because of funding specific to a Presidentially declared disaster, resulting in a change to the CoC’s 2018 sheltered PIT count? No

2C-3a. If “Yes” was selected for question 2C-3, applicants must enter the number of beds that were added or removed in 2018 because of a Presidentially declared disaster.

Beds Added:	0
Beds Removed:	0
Total:	0

2C-4. Changes in Unsheltered PIT Count Implementation. Did your CoC change its unsheltered PIT count implementation, including methodology and data quality changes from 2017 to 2018? If your CoC did not conduct and unsheltered PIT count in 2018, select Not Applicable. Yes

2C-4a. If “Yes” was selected for question 2C-4, applicants must:
(1) describe any change in the CoC’s unsheltered PIT count implementation, including methodology and data quality changes from 2017 to 2018; and
(2) specify how those changes impacted the CoC’s unsheltered PIT count results.
(limit 2,000 characters)

(1) The CoC worked hard to improve the unsheltered PIT from 2017 to 2018. The CoC strengthened connections with informal outreach groups who provide support to the unsheltered year-round, in order to increase coverage and knowledge of street outreach locations. We improved our partnership with police, outreach agencies and young adults which allowed us to have team leads on the street count night that have relationships with the homeless. Many outreach partners are also connected with the homeless on social media through which they may share their location. (2) These partnerships and methods improved our knowledge of sites and allowed us to create precise maps for the count. Additionally, social media allowed us to enhance recruiting and triple the number of volunteers (from 100-300 volunteers) and therefore increase the number of sites we search throughout the county during the PIT. While these efforts led to a slight increase in those counted, we feel our efforts have improved our understanding of who is in need. This should not be construed as an increase in street homelessness but an improvement in our street outreach process.

2C-5. Identifying Youth Experiencing Homelessness in 2018 PIT Count. Did your CoC implement specific measures to identify youth experiencing homelessness in its 2018 PIT count? Yes

2C-5a. If “Yes” was selected for question 2C-5., applicants must describe:
(1) how stakeholders serving youth experiencing homelessness were engaged during the planning process;
(2) how the CoC worked with stakeholders to select locations where youth experiencing homelessness are most likely to be identified; and
(3) how the CoC involved youth experiencing homelessness in counting during the 2018 PIT count.
(limit 2,000 characters)

(1) The Louisville CoC began a community-wide effort to address youth and young adult homelessness in 2016, and we took part in a 100-Day Youth

Homeless Challenge in 2017. The Challenge was successful in housing over 100 homeless youth, and brought together a wide range of service providers (e.g. YMCA Safe Place) and stakeholders who all have a shared interest in serving youth. The CoC then held planning meetings with the Homeless Youth Committee and Youth Action Board made up of formerly homeless youth under 25 to create recommendations for engaging youth listed on our by name list through social media and outreach, hosting outreach locations for homeless youth to come to during PIT and other suggestions. (2) Both groups also created lists of known camps and sites where homeless youth congregate as well as service locations that homeless youth could come to the night of PIT along with incentives for their participation in the count. (3) Finally members of the YAB, others they recruited and staff of youth service providers all participated in the PIT and led teams that counted at known youth sites.

2C-6. 2018 PIT Implementation. Applicants must describe actions the CoC implemented in its 2018 PIT count to better count:

- (1) individuals and families experiencing chronic homelessness;**
 - (2) families with children experiencing homelessness; and**
 - (3) Veterans experiencing homelessness.**
- (limit 2,000 characters)**

The committee first conducted an outreach campaign to increase the number of experienced local volunteer homeless outreach groups participating in the street count. (1) The CoC also improved work with local police, outreach agencies and veterans to identify new sites and team leads knowledgeable about these sites for the PIT. Many outreach partners have social media and text systems that allowed them to reach out to the chronically homeless in order to find and count them that night. They also hosted a give away night with food, clothing and other items so that chronically homeless persons would come for services and be counted that evening. (2) The Louisville CoC maintains a waiting list of homeless families who cannot access shelter. This list is used to find families who are on the streets during the PIT in addition to any families identified by the outreach teams described above. (3) Louisville has an amazing outreach team and SSVF program that work to immediately identify, shelter and house all veterans in the community. They maintain a by name list that allows us to find and count any homeless veterans on the streets during the PIT.

3A. Continuum of Care (CoC) System Performance

Instructions

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

3A-1. First Time Homeless as Reported in HDX. In the box below, applicants must report the number of first-time homeless as reported in HDX.

Number of First Time Homeless as Reported in HDX.	3,379
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3A-1a. Applicants must:

- (1) describe how the CoC determined which risk factors the CoC uses to identify persons becoming homeless for the first time;**
- (2) describe the CoC's strategy to address individuals and families at risk of becoming homeless; and**
- (3) provide the name of the organization or position title that is responsible for overseeing the CoC's strategy to reduce the number of individuals and families experiencing homelessness for the first time. (limit 2,000 characters)**

(1) The factors used to identify persons becoming homeless for the first time are percentage of income spent on housing, income versus FMR, evictions, whether homeless risk is based on one-time experience or on-going issue, and ability to increase income in the future. (2) In order to decrease first time homelessness, the CoC has hired two staff to coordinate prevention and diversion in the Single Point of Entry. They work to help families on the shelter waiting list to access permanent housing without having to enter shelter and prevent homelessness for those who are at risk of losing housing through one-time funding and referrals to mainstream services. These services are offered in coordination with homeless service providers and the city's Neighborhood Place one-stop shop that coordinates all other mainstream prevention services in the community. These agencies located throughout the county conduct an assessment to insure families and individuals are accessing all eligible benefits and bring together the partners who can assist with rent and other household debt. (3) The entity responsible for overseeing the CoC's strategy to reduce first time homelessness is the SPE Prevention/Diversion Program in coordination with the Metro Louisville Neighborhood Place.

3A-2. Length-of-Time Homeless as Reported in HDX. Applicants must:

- (1) provide the average length of time individuals and persons in families remained homeless (i.e., the number);**
- (2) describe the CoC's strategy to reduce the length-of-time individuals and persons in families remain homeless;**
- (3) describe how the CoC identifies and houses individuals and persons in families with the longest lengths of time homeless; and**

(4) provide the name of the organization or position title that is responsible for overseeing the CoC’s strategy to reduce the length of time individuals and families remain homeless. (limit 2,000 characters)

(1) The average length of time homeless in Louisville decreased by 13 days to 64 in 2017. (2) In order to shorten length of time homeless in Louisville, the CoC agreed to prioritize the chronically homeless and long stayers in the homeless service system through our common assessment and prioritize them for housing. (3) To identify those with the longest length of time homeless, the CoC worked to create an HMIS report that identifies long term stayers in the system and then partnered with the common assessment team and shelters to house these individuals or exit them in HMIS if that is the issue. The Coll. App. hired an AmeriCorps member to help individuals in shelter with a voucher complete a housing search and move from shelter as quickly as possible. New PSH vouchers are also dedicated to those most vulnerable on the streets and this tends to align with those who have been homeless for longer periods of time. A staff member of the CoC Lead sits on the board of the Affordable Housing Trust Fund to ensure new affordable housing is accessible and focused towards homeless populations. (4) The entity responsible for overseeing the CoC’s strategy to reduce length of time homeless is the CoC Board.

3A-3. Successful Permanent Housing Placement and Retention as Reported in HDX. Applicants must:

- (1) provide the percentage of individuals and persons in families in emergency shelter, safe havens, transitional housing, and rapid rehousing that exit to permanent housing destinations; and**
- (2) provide the percentage of individuals and persons in families in permanent housing projects, other than rapid rehousing, that retain their permanent housing or exit to permanent housing destinations.**

	Percentage
Report the percentage of individuals and persons in families in emergency shelter, safe havens, transitional housing, and rapid re-housing that exit to permanent housing destinations as reported in HDX.	20%
Report the percentage of individuals and persons in families in permanent housing projects, other than rapid re-housing, that retain their permanent housing or exit to permanent housing destinations as reported in HDX.	97%

3A-3a. Applicants must:

- (1) describe the CoC’s strategy to increase the rate at which individuals and persons in families in emergency shelter, safe havens, transitional housing and rapid rehousing exit to permanent housing destinations; and**
 - (2) describe the CoC’s strategy to increase the rate at which individuals and persons in families in permanent housing projects, other than rapid rehousing, retain their permanent housing or exit to permanent housing destinations.**
- (limit 2,000 characters)**

(1) In order to increase the rate at which the homeless exit to permanent housing, the CoC has prioritized access to permanent housing as well as housing access resources that allow individuals and families to move quickly into housing. New housing vouchers and set asides include those made available through Louisville Metro Housing Authority, CoC Permanent Supportive Housing and CSBG. Additional supports include a Housing

Navigator funded by the CoC Lead that helps clients across multiple agencies with the housing search, a flexible pool of funding for deposits and furniture, and case management to assist in the housing transition (2) Louisville had a 5% increase in permanent housing retention in permanent housing projects in 2017. Our approach to create and maintain this increase is to provide strong supports for those in housing including assistance with one-time financial concerns, assistance with daily living skills and supported employment, and other support identified in individual case plans. Additional support typically includes referrals to resources such as SOAR, representative payee, financial health counseling, and legal aid entities.

3A-4. Returns to Homelessness as Reported in HDX. Applicants must report the percentage of individuals and persons in families returning to homelessness over a 6- and 12-month period as reported in HDX.

	Percentage
Report the percentage of individuals and persons in families returning to homelessness over a 6- and 12-month period as reported in HDX	17%

3A-4a. Applicants must:

- (1) describe how the CoC identifies common factors of individuals and persons in families who return to homelessness;**
- (2) describe the CoC’s strategy to reduce the rate of additional returns to homelessness; and**
- (3) provide the name of the organization or position title that is responsible for overseeing the CoC’s strategy to reduce the rate individuals and persons in families returns to homelessness. (limit 2,000 characters)**

(1) The Coll. App. has used HMIS report data to identify homeless individuals and families most likely to return to homelessness. Factors include: large family size, unemployment, poor physical or mental health, substance use, domestic violence, lack of affordable housing, not enough income to meet their needs. (2) The Louisville CoC will use this information to help emergency and transitional shelters identify individuals and families that may need additional assistance with deposits and access to income prior to exiting shelter. The data is also being used to create better HMIS data entry on who is truly exiting to permanent housing. The CoC Lead has created a diversion pilot program to help ensure those at risk of returning to homelessness are connected to appropriate community resources prior to reentering the homeless services system. The goal of this program is to divert those who only need short term assistance into mainstream services and away from cost intensive shelter services. (3) The entity responsible for reducing returns to homelessness is the full CoC that has been meeting and discussing this measure throughout the year. The effort is led by the Coll. App. Monitoring and Training Specialist.

3A-5. Job and Income Growth. Applicants must:

- (1) describe the CoC’s strategy to increase access to employment and non-employment cash sources;**
- (2) describe how the CoC works with mainstream employment organizations to help individuals and families increase their cash income; and**

**(3) provide the organization name or position title that is responsible for overseeing the CoC’s strategy to increase job and income growth from employment.
(limit 2,000 characters)**

(1) The Louisville CoC saw a 5% increase to 30% in the number of persons who increased income. The CoC’s lead strategy is to insure that all homeless individuals and families access mainstream benefits and income as well as employment. First, the Mainstream Services Committee (MSC) meets monthly to educate case managers about benefits and changes, and also discusses job opportunities. Second, the Commonwealth created Benefind that allows persons in need to sign up for multiple benefits at once and quickly reinstate benefits when needed. Third, one of our CoC-funded agencies hired an employment specialist who helped over 60 individuals find work. Lastly, one of our Medicaid providers provided funds to a local agency to provide training for manufacturing jobs and assistance with getting a job once training is complete. (2) The CoC has worked to increase employment opportunities. Wellspring has created a supported employment program and over 150 slots of employment have been set aside through partners in our young adult homeless effort. A rep. from the local American Job Center started attending CoC mtgs. and regularly shares job openings and trainings. We also have an HVRP grantee that helps homeless veterans find jobs. The CoC Lead is also working to identify and develop partnerships with large industries in the area. Amazon and UPS are two major local employers who the CoC Lead have been in contact with regarding entry level employment opportunities. (3) The entity responsible for increasing income from mainstream benefits is the Mainstream Services Committee of the CoC that meets monthly. The entity responsible for income growth from employment is the Education/Employment Subcommittee that meets quarterly (homeless youth).

3A-6. System Performance Measures Data 05/31/2018
Submission in HDX. Applicants must enter
the date the CoC submitted the System
Performance Measures data in HDX, which
included the data quality section for FY 2017
(mm/dd/yyyy)

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

Instructions

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

- 3B-1. DedicatedPLUS and Chronically Homeless Beds. In the boxes below, applicants must enter:**
- (1) total number of beds in the Project Application(s) that are designated as DedicatedPLUS beds; and**
 - (2) total number of beds in the Project Application(s) that are designated for the chronically homeless, which does not include those that were identified in (1) above as DedicatedPLUS Beds.**

Total number of beds dedicated as DedicatedPLUS	201
Total number of beds dedicated to individuals and families experiencing chronic homelessness	0
Total	201

3B-2. Orders of Priority. Did the CoC adopt the Orders of Priority into their written standards for all CoC Program-funded PSH projects as described in Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing? Attachment Required. Yes

3B-2.1. Prioritizing Households with Children. Using the following chart, applicants must check all that apply to indicate the factor(s) the CoC currently uses to prioritize households with children during FY 2018.

History of or Vulnerability to Victimization (e.g. domestic violence, sexual assault, childhood abuse)	<input checked="" type="checkbox"/>
Number of previous homeless episodes	<input checked="" type="checkbox"/>
Unsheltered homelessness	<input checked="" type="checkbox"/>
Criminal History	<input checked="" type="checkbox"/>
Bad credit or rental history	<input checked="" type="checkbox"/>
Head of Household with Mental/Physical Disability	<input checked="" type="checkbox"/>

3B-2.2. Applicants must:

- (1) describe the CoC’s current strategy to rapidly rehouse every household of families with children within 30 days of becoming homeless;**
 - (2) describe how the CoC addresses both housing and service needs to ensure families successfully maintain their housing once assistance ends; and**
 - (3) provide the organization name or position title responsible for overseeing the CoCs strategy to rapidly rehouse families with children within 30 days of becoming homeless.**
- (limit 2,000 characters)**

(1) The CoC has worked to increase the number of RRH units available to families through ESG and CoC funding and has now added RRH units funded through CSBG. Units are filled by a common assessment team that assesses and ranks all homeless persons in Louisville within 14 days of homelessness in order to insure families are housed quickly. The CoC works with landlords to increase available units and cross trains staff so that an HQS inspection can be conducted the same day a unit is vacated. With these steps in place a family can be identified and access housing within 30 days of homelessness if we had available resources for everyone. (2) Until that level of resources can be identified, we have created a prevention/diversion program to quickly identify families that can be diverted from the homeless system using mainstream services and case management through this team to access additional supports in the community to maintain housing. Additionally, the Louisville CoC created a “move on” subsidy program in partnership with our PHA. Through this program families receiving RRH who need long-term assistance can get a long term subsidy, or those receiving PSH who no longer need case management can receive this subsidy instead. This insures that families who are not successful in RRH do not return to homelessness, and that those receiving PSH for the long-term are the most vulnerable. (3) The team responsible for rapidly rehousing families in the Louisville CoC is the SPE Prevention/Diversion staff in coordination with the RRH providers.

3B-2.3. Antidiscrimination Policies. Applicants must check all that apply that describe actions the CoC is taking to ensure providers (including emergency shelter, transitional housing, and permanent supportive housing (PSH and RRH) within the CoC adhere to antidiscrimination policies by not denying admission to or separating any family members from other members of their family or caregivers based on age, sex, gender, LGBT status, marital status, or disability when entering a shelter or housing.

CoC conducts mandatory training for all CoC and ESG funded service providers on these topics.	<input checked="" type="checkbox"/>
CoC conducts optional training for all CoC and ESG funded service providers on these topics.	<input type="checkbox"/>
CoC has worked with ESG recipient(s) to adopt uniform anti-discrimination policies for all subrecipients.	<input checked="" type="checkbox"/>
CoC has worked with ESG recipient(s) to identify both CoC and ESG funded facilities within the CoC geographic area that may be out of compliance, and taken steps to work directly with those facilities to come into compliance.	<input checked="" type="checkbox"/>
CoC has sought assistance from HUD through submitting AAQs or requesting TA to resolve non-compliance of service providers.	<input checked="" type="checkbox"/>

3B-2.4. Strategy for Addressing Needs of Unaccompanied Youth Experiencing Homelessness. Applicants must indicate whether the CoC’s strategy to address the unique needs of unaccompanied homeless youth

includes the following:

Human trafficking and other forms of exploitation	Yes
LGBT youth homelessness	Yes
Exits from foster care into homelessness	Yes
Family reunification and community engagement	Yes
Positive Youth Development, Trauma Informed Care, and the use of Risk and Protective Factors in assessing youth housing and service needs	Yes

3B-2.5. Prioritizing Unaccompanied Youth Experiencing Homelessness Based on Needs. Applicants must check all that apply from the list below that describes the CoC's current strategy to prioritize unaccompanied youth based on their needs.

History or Vulnerability to Victimization (e.g., domestic violence, sexual assault, childhood abuse)	<input checked="" type="checkbox"/>
Number of Previous Homeless Episodes	<input checked="" type="checkbox"/>
Unsheltered Homelessness	<input checked="" type="checkbox"/>
Criminal History	<input checked="" type="checkbox"/>
Bad Credit or Rental History	<input type="checkbox"/>

**3B-2.6. Applicants must describe the CoC's strategy to increase:
(1) housing and services for all youth experiencing homelessness by providing new resources or more effectively using existing resources, including securing additional funding; and
(2) availability of housing and services for youth experiencing unsheltered homelessness by providing new resources or more effectively using existing resources.
(limit 3,000 characters)**

(1) In October 2016, the CoC created an extensive plan to address youth and young adult homelessness with 70 partners. This plan assesses the existing resources and lists gaps to house all homeless youth. In 2017, Louisville was one of five cities in the 100 day challenge and housed 115 homeless youth in 100 days. Louisville did this by creating a by name list of homeless youth and trying every possible way to create systems to house these youth including adding 32 new transitional, 60 new permanent and 20 new RRH units for youth; applying for new types of vouchers and public housing, working with police to get youth off the streets, DCBS to help youth return to state care and working with employment agencies for 150 slots. We tested additional model programs including fictive care, Family Scholar House and Host Homes. In 2018, we were selected to receive a YHDP grant of \$3.45 million to be matched by over \$6.4 million. (2) Because 40% of homeless youth in Louisville are victims of sex trafficking and those on the streets are especially vulnerable to violence, Louisville works to quickly identify and serve unsheltered homeless youth. This is done through a hotline, outreach with local police and prioritization for shelter, housing and services listed above for this population. The Louisville CoC has

also accessed YHDP and matching funds to increase homeless outreach, housing and services for unsheltered youth.

3B-2.6a. Applicants must:

(1) provide evidence the CoC uses to measure both strategies in question 3B-2.6. to increase the availability of housing and services for youth experiencing homelessness;

(2) describe the measure(s) the CoC uses to calculate the effectiveness of the strategies; and

(3) describe why the CoC believes the measure it uses is an appropriate way to determine the effectiveness of the CoC's strategies.

(limit 3,000 characters)

(1) The Louisville Youth Homeless Committee of the CoC meets monthly to measure housing resources for youth and work toward the creation of new resources. This is tracked through an inventory list included in the community plan that includes shelter, housing, education, employment and additional services. (2) The YHC also meets to coordinate services, access new resources and measure progress. They measure the types of housing used to house homeless youth to determine which approaches are most successful, the rate of housing youth (how many access housing per month) to insure we are on track to end youth homelessness and the number of youth on the by name list. (3) By tracking youth through the by name list coordinated through HMIS, we are able to see a 50% reduction in homeless youth since 2016. Tracking housing placements shows a 500% increase in the rate of housing youth. Tracking placement types shows which housing is most successful and for which sub-populations. While we believe strongly that the number on the by name list is the most accurate determinant of housing need, we also think access to services and education/support are important for this population so that they can exit homelessness before they are more likely to see it as a way of life for the future so we do also track education and employment set asides.

3B-2.7. Collaboration–Education Services. Applicants must describe how the CoC collaborates with:

(1) youth education providers;

(2) McKinney-Vento State Education Agency (SEA) and Local Education Agency (LEA);

(3) school districts; and

(4) the formal partnerships with (1) through (3) above.

(limit 2,000 characters)

(1) All local youth education providers from early childhood to college have been included on the YHC of the CoC and in creating the plan to end youth homelessness. These groups have created set asides for homeless youth, provided training on access to higher education and meet to coordinate education services with housing resources. (2) Our LEA, Giselle Danger-Mecaderes, is also a member of the Louisville CoC Board of Directors, the Louisville Homeless Youth Committee and the 100 Day Homeless Youth team. She hosts annual training for all teachers and school educators with the Coll. App. including the rights of homeless children. She provides transportation within 24 hours, uniforms, school supplies and advocacy for homeless youth and creates priorities for them to access out of school time and summer

assistance. She provides training to parents in shelter about access to school and conducts an assessment of all youth in shelters to address needs. The CoC collaborates with the SEA through the Kentucky Interagency Council on Homelessness and through annual trainings she conducts with our teachers and shelters. (3) Louisville has a single school district, JCPS. In addition with our coordination through their LEA, the CoC attends school board meetings on issues pertaining to homeless and foster care youth and sits on both board committees. The CoC also holds a seat on the JCPS committee working to create an integrated service support delivery system to youth in schools identified as at risk and provides training about the homeless system and supports to the school's family resource centers. (4) The Louisville CoC has formal MOUs for the work of the HYC with both the LEA and JCPS, our school district.

3B-2.7a. Applicants must describe the policies and procedures the CoC adopted to inform individuals and families who become homeless of their eligibility for education services. (limit 2,000 characters)

The CoC policies require each shelter to name a homeless education coordinator. This name is posted at the shelter on a poster outlining the rights of all children to attend and acquire access to school and the homeless education coordinator works with each family with school age youth to make sure they understand these rights and are can work with the LEA on access and transportation. The homeless education coordinator at each shelter works with the LEA to insure access to education for all students. The LEA invites all homeless education coordinators to annual training on the rights of homeless children and how to insure these rights are protected.

3B-2.8. Does the CoC have written formal agreements, MOU/MOAs or partnerships with one or more providers of early childhood services and supports? Select "Yes" or "No". Applicants must select "Yes" or "No", from the list below, if the CoC has written formal agreements, MOU/MOA's or partnerships with providers of early childhood services and support.

	MOU/MOA	Other Formal Agreement
Early Childhood Providers	No	Yes
Head Start	No	Yes
Early Head Start	No	No
Child Care and Development Fund	No	Yes
Federal Home Visiting Program	No	No
Healthy Start	Yes	No
Public Pre-K	No	Yes
Birth to 3 years	No	No
Tribal Home Visting Program	No	No
Other: (limit 50 characters)		

3B-3.1. Veterans Experiencing Homelessness. Applicants must describe the actions the CoC has taken to identify, assess, and refer Veterans experiencing homelessness, who are eligible for U.S. Department of Veterans Affairs (VA) housing and services, to appropriate resources such as HUD-VASH, Supportive Services for Veterans Families (SSVF) program and Grant and Per Diem (GPD). (limit 2,000 characters)

The CoC has an array of services and housing for homeless veterans. In 2015, Louisville prioritized homeless veterans and housed 1100 in a two year period. In 2017, the rate of newly homeless veterans also decreased from 25 to 19 per month. The VA coordinates outreach to identify newly homeless veterans and refers to Volunteers of America, the SSVF provider and front door for homeless veterans. VOA provides an assessment and makes referrals to shelter, housing, services and employment. Louisville has no waiting list for per diem beds and immediately begins working with these veterans to access permanent housing through VASH and/or set asides in Section 8. This makes it possible to quickly house veterans with any vulnerabilities including disabilities, low/no income, substance abuse, criminal history and/or chronic homelessness. The homeless veteran committee continues to meet quarterly to insure they are meeting their goals and housing veterans at the rate they become homeless. The first point of contact for a homeless veteran identified by the Louisville CoC coordinated entry is the SSVF provider. If the SSVF provider determines the veteran in question is in need of Permanent Supportive Housing they will then refer them for a VASH voucher.

3B-3.2. Does the CoC use an active list or by name list to identify all Veterans experiencing homelessness in the CoC? Yes

3B-3.3. Is the CoC actively working with the VA and VA-funded programs to achieve the benchmarks and criteria for ending Veteran homelessness? Yes

3B-3.4. Does the CoC have sufficient resources to ensure each Veteran experiencing homelessness is assisted to quickly move into permanent housing using a Housing First approach? Yes

3B-5. Racial Disparity. Applicants must: Yes
(1) indicate whether the CoC assessed whether there are racial disparities in the provision or outcome of homeless assistance;
(2) if the CoC conducted an assessment, attach a copy of the summary.

3B-5a. Applicants must select from the options below the results of the CoC's assessment.

People of different races or ethnicities are more or less likely to receive homeless assistance.	<input checked="" type="checkbox"/>
People of different races or ethnicities are more or less likely to receive a positive outcome from homeless assistance.	<input type="checkbox"/>
There are no racial disparities in the provision or outcome of homeless assistance.	<input type="checkbox"/>
The results are inconclusive for racial disparities in the provision or outcome of homeless assistance.	<input type="checkbox"/>

3B-5b. Applicants must select from the options below the strategies the CoC is using to address any racial disparities.

The CoC's board and decisionmaking bodies are representative of the population served in the CoC.	<input type="checkbox"/>
The CoC has identified steps it will take to help the CoC board and decisionmaking bodies better reflect the population served in the CoC.	<input type="checkbox"/>
The CoC is expanding outreach in geographic areas with higher concentrations of underrepresented groups.	<input checked="" type="checkbox"/>
The CoC has communication, such as flyers, websites, or other materials, inclusive of underrepresented groups	<input type="checkbox"/>
The CoC is training staff working in the homeless services sector to better understand racism and the intersection of racism and homelessness.	<input checked="" type="checkbox"/>
The CoC is establishing professional development opportunities to identify and invest in emerging leaders of different races and ethnicities in the homelessness sector.	<input type="checkbox"/>
The CoC has staff, committees or other resources charged with analyzing and addressing racial disparities related to homelessness.	<input checked="" type="checkbox"/>
The CoC is educating organizations, stakeholders, boards of directors for local and national non-profit organizations working on homelessness on the topic of creating greater racial and ethnic diversity.	<input type="checkbox"/>
The CoC reviewed coordinated entry processes to understand their impact on people of different races and ethnicities experiencing homelessness.	<input checked="" type="checkbox"/>
The CoC is collecting data to better understand the pattern of program use for people of different races and ethnicities in its homeless services system.	<input checked="" type="checkbox"/>
The CoC is conducting additional research to understand the scope and needs of different races or ethnicities experiencing homelessness.	<input checked="" type="checkbox"/>
Other:	<input type="checkbox"/>

4A. Continuum of Care (CoC) Accessing Mainstream Benefits and Additional Policies

Instructions:

For guidance on completing this application, please reference the FY 2018 CoC Application Detailed Instructions and the FY 2018 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

- 4A-1. Healthcare. Applicants must indicate, for each type of healthcare listed below, whether the CoC:**
- (1) assists persons experiencing homelessness with enrolling in health insurance; and**
 - (2) assists persons experiencing homelessness with effectively utilizing Medicaid and other benefits.**

Type of Health Care	Assist with Enrollment	Assist with Utilization of Benefits?
Public Health Care Benefits (State or Federal benefits, Medicaid, Indian Health Services)	Yes	Yes
Private Insurers:	Yes	Yes
Non-Profit, Philanthropic:	Yes	Yes
Other: (limit 50 characters)		

- 4A-1a. Mainstream Benefits. Applicants must:**
- (1) describe how the CoC works with mainstream programs that assist persons experiencing homelessness to apply for and receive mainstream benefits;**
 - (2) describe how the CoC systematically keeps program staff up-to-date regarding mainstream resources available for persons experiencing homelessness (e.g., Food Stamps, SSI, TANF, substance abuse programs); and**
 - (3) provide the name of the organization or position title that is responsible for overseeing the CoC’s strategy for mainstream benefits. (limit 2,000 characters)**

(1) The CoC works with the Kentucky Interagency Council on Homelessness to improve access and availability to mainstream resources. In 2017, Kentucky created Benefind, a new on-line system to allow applicants to apply for multiple benefits at once including Medicaid, food stamps, SSDI child care, TANF and more. (2) The CoC coordinates with Metro United Way to keep case managers informed of mainstream benefits and changes. Each month, a lunch and learn is available on a different resource and the providers make a presentation and answer questions about access to food, mental health services, subsidized housing, medical services, substance abuse, employment, etc. (3) The Mainstream Services Committee of the CoC is the group primarily responsible for insuring that all homeless can access mainstream services and benefits.

The committee meets monthly and brings in different mainstream providers to address questions about such benefits as Medicaid, food stamps, TANF, VA benefits, and substance abuse programs. All front line homeless case managers are invited to these meetings.

4A-2.Housing First: Applicants must report:

- (1) total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition; and**
- (2) total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition that have adopted the Housing First approach—meaning that the project quickly houses clients without preconditions or service participation requirements.**

Total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition.	29
Total number of new and renewal CoC Program Funded PSH, RRH, SSO non-coordinated entry, Safe-Haven, and Transitional Housing projects the CoC is applying for in FY 2018 CoC Program Competition that have adopted the Housing First approach—meaning that the project quickly houses clients without preconditions or service participation requirements.	28
Percentage of new and renewal PSH, RRH, Safe-Haven, SSO non-Coordinated Entry projects in the FY 2018 CoC Program Competition that will be designated as Housing First.	97%

4A-3. Street Outreach. Applicants must:

- (1) describe the CoC’s outreach;**
- (2) state whether the CoC's Street Outreach covers 100 percent of the CoC’s geographic area;**
- (3) describe how often the CoC conducts street outreach; and**
- (4) describe how the CoC tailored its street outreach to persons experiencing homelessness who are least likely to request assistance. (limit 2,000 characters)**

(1) The Louisville CoC outreach teams are out seven days a week and include staff from mental health and substance abuse recovery, Health Care for the Homeless and VA hospital. These groups communicate to additional volunteers working other days and nights to stay updated on needs through social media. During cold weather, a van travels through the county to bring the homeless to overflow shelter. The outreach teams serve as part of the single point of entry collecting HMIS data on the street homeless. The outreach teams work with the homeless youth advisory board, homeless veteran groups, police officers, local churches, hospitals and community ministries in every zip code to identify new homeless camps including those with youth and veterans. Additionally, Louisville has hundreds of volunteers that provide outreach. The CoC coordinates quarterly meetings with them on Saturdays to identify anyone who may need additional services. (2) The CoC has a community-wide (100% of county) outreach program. (3) Street outreach is conducted 24 hours 7 days per week by teams who communicate regularly through social media. (4) The outreach teams include the community mental health center outreach program and access to a model “living room” program where those with acute mental health services can go to be assessed and access services. Outreach teams are also trained in trauma informed care, de-escalation and mental health

service access. All outreach teams have access to translation services for those who are not English speaking through a phone translation service and materials about homeless services are available in Spanish through publication and an on-line app. Metro Louisville also has an email notification list so that if citizens or businesses identify homeless sites that have been missed by outreach teams they can quickly be notified and the site is added to that nights visit list.

4A-4. Affirmative Outreach. Applicants must describe:

- (1) the specific strategy the CoC implemented that furthers fair housing as detailed in 24 CFR 578.93(c) used to market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, gender identify, sexual orientation, age, familial status or disability; and**
- (2) how the CoC communicated effectively with persons with disabilities and limited English proficiency fair housing strategy in (1) above. (limit 2,000 characters)**

(1) The Louisville CoC has developed many outreach materials to make it easy for the homeless to access homeless services and housing. The first is our Street Tips booklet that outlines how to access shelter through a single point of entry open seven days per week and lists all other emergency services for the homeless. This is distributed free to schools, hospitals, community ministries and other service providers who may meet homeless individuals and families. In 2017, Louisville also created LouisCONNECT an on-line app. that allows anyone to access no-cost emergency services. This system's staff conduct an on-site visit to each site to address any access issues for the disabled. The app. can be used in libraries and other community facilities and allows resources to be saved in order to access without the InterNet. (2) Both Street Tips and LouisCONNECT are available in English and Spanish and the single point of entry has access to a translation service in order to safely shelter anyone speaking any language including American Sign Language if on site as do the homeless outreach teams as described above. However, homeless persons are increasingly accessing social media for services so the single point of entry now has a twitter page to notify the homeless of services and vacancies and outreach teams are using texts and Facebook to find homeless persons on the streets.

4A-5. RRH Beds as Reported in the HIC. Applicants must report the total number of rapid rehousing beds available to serve all household types as reported in the Housing Inventory Count (HIC) for 2017 and 2018.

	2017	2018	Difference
RRH beds available to serve all populations in the HIC	123	331	208

4A-6. Rehabilitation or New Construction Costs. Are new proposed project applications requesting \$200,000 or more in funding for housing rehabilitation or new construction? No

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

4B. Attachments

Instructions:

Multiple files may be attached as a single .zip file. For instructions on how to use .zip files, a reference document is available on the e-snaps training site:
<https://www.hudexchange.info/resource/3118/creating-a-zip-file-and-capturing-a-screenshot-resource>

Document Type	Required?	Document Description	Date Attached
1C-5. PHA Administration Plan–Homeless Preference	No	1C-5. PHA Adminis...	09/14/2018
1C-5. PHA Administration Plan–Move-on Multifamily Assisted Housing Owners' Preference	No	1C-5. PHA Adminis...	09/14/2018
1C-8. Centralized or Coordinated Assessment Tool	Yes	1C-8. Centralized...	09/13/2018
1E-1. Objective Criteria–Rate, Rank, Review, and Selection Criteria (e.g., scoring tool, matrix)	Yes	1E-1. Objective C...	09/12/2018
1E-3. Public Posting CoC-Approved Consolidated Application	Yes		
1E-3. Public Posting–Local Competition Rate, Rank, Review, and Selection Criteria (e.g., RFP)	Yes	1E-3. Public Post...	09/13/2018
1E-4. CoC's Reallocation Process	Yes	1E-4. CoC's Reall...	09/12/2018
1E-5. Notifications Outside e-snaps–Projects Accepted	Yes	1E-5. Notificatio...	09/12/2018
1E-5. Notifications Outside e-snaps–Projects Rejected or Reduced	Yes	1E-5. Notificatio...	09/12/2018
1E-5. Public Posting–Local Competition Deadline	Yes	1E-5. Public Post...	09/12/2018
2A-1. CoC and HMIS Lead Governance (e.g., section of Governance Charter, MOU, MOA)	Yes	2A-1. CoC and HMI...	09/12/2018
2A-2. HMIS–Policies and Procedures Manual	Yes	2A-2. HMIS–Polic...	09/12/2018
3A-6. HDX–2018 Competition Report	Yes	3A-6. HDX–2018 Co...	09/12/2018
3B-2. Order of Priority–Written Standards	No	3B-2. Order of Pr...	09/13/2018

3B-5. Racial Disparities Summary	No	3B-5. Racial Disp...	09/12/2018
4A-7.a. Project List–Persons Defined as Homeless under Other Federal Statutes (if applicable)	No		
Other	No		
Other	No		
Other	No		

Attachment Details

Document Description: 1C-5. PHA Administration Plan–Homeless Preference

Attachment Details

Document Description: 1C-5. PHA Administration Plan–Move-on Multifamily Assisted Housing Owners' Preference

Attachment Details

Document Description: 1C-8. Centralized or Coordinated Assessment Tool

Attachment Details

Document Description: 1E-1. Objective Criteria–Rate, Rank, Review, and Selection Criteria

Attachment Details

Document Description:

Attachment Details

Document Description: 1E-3. Public Posting–Local Competition Rate, Rank, Review, and Selection Criteria

Attachment Details

Document Description: 1E-4. CoC’s Reallocation Process

Attachment Details

Document Description: 1E-5. Notifications Outside e-snaps–Projects Accepted

Attachment Details

Document Description: 1E-5. Notifications Outside e-snaps–Projects Rejected or Reduced

Attachment Details

Document Description: 1E-5. Public Posting–Local Competition Deadline

Attachment Details

Document Description: 2A-1. CoC and HMIS Lead Governance

Attachment Details

Document Description: 2A-2. HMIS–Policies and Procedures Manual

Attachment Details

Document Description: 3A-6. HDX–2018 Competition Report

Attachment Details

Document Description: 3B-2. Order of Priority–Written Standards

Attachment Details

Document Description: 3B-5. Racial Disparities Summary

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Submission Summary

Ensure that the Project Priority List is complete prior to submitting.

Page	Last Updated
1A. Identification	09/11/2018
1B. Engagement	09/12/2018
1C. Coordination	09/11/2018
1D. Discharge Planning	09/11/2018
1E. Project Review	09/12/2018
2A. HMIS Implementation	09/14/2018
2B. PIT Count	09/11/2018
2C. Sheltered Data - Methods	09/11/2018
3A. System Performance	09/14/2018
3B. Performance and Strategic Planning	09/14/2018
4A. Mainstream Benefits and Additional Policies	09/11/2018
4B. Attachments	Please Complete

Submission Summary

No Input Required

LOUISVILLE METRO HOUSING AUTHORITY



HOUSING CHOICE VOUCHER PROGRAM ADMINISTRATIVE PLAN

January 2018



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1. INTRODUCTION

A. THE TENANT-BASED HOUSING CHOICE VOUCHER PROGRAM¹

The tenant-based Housing Choice Voucher (HCV) Program is operated by the Department of Housing and Urban Development (HUD). Through the HCV Program, eligible Low-Income Families receive rental subsidies, so they can afford decent, safe, and sanitary housing.

Once an Applicant Family's eligibility for the Program has been determined, the Family selects a dwelling unit that meets Program requirements, and signs a rental Lease with the unit's Owner. Typically, the Family then pays 30% of their Monthly Adjusted Income towards their rent, while an additional rent subsidy payment is made directly to the Owner on behalf of the Family.

The HCV Program is most often administrated by state or local government entities called Public Housing Agencies using housing assistance funds provided by HUD. The Louisville Metro Housing Authority (LMHA) is the Public Housing Agency that administers the HCV Program in Louisville, Kentucky.

This Administrative Plan describes the policies the LMHA uses to administer its HCV Program.

B. COMPLIANCE WITH LAWS AND REGULATIONS

The operation of the Housing Authority's HCV Program will comply with the following:

1. All federal, state, and local laws;
2. The Housing Authority's consolidated Annual Contributions Contract with HUD;
3. The requirements of any grant agreement signed by the LMHA as a condition of receiving specific vouchers; and
4. HUD regulations.

If there is any conflict between this policy and laws or regulations, the laws and regulations will prevail.

¹ 24 CFR 982.1, Programs: Purpose and Structure

C. HCV PROGRAM FLEXIBILITIES PROVIDED THROUGH MOVING TO WORK (MTW)

This HCV Administrative Plan is aligned with the Moving to Work (MTW) Agreement by and between HUD and the LMHA, as amended and restated on April 15, 2008, and including any subsequent amendments thereto. The MTW Agreement governs and supersedes, as appropriate, applicable federal laws, rules, regulations, contracts, and agreements that have been or will be waived and/or modified by the MTW Agreement and subsequent amendments to the Agreement.

This Administrative Plan, in conjunction with the approved MTW Annual Plan, together comprise the operational policies of the Housing Authority's HCV Program.

With HUD approval, the LMHA has implemented a number of specific activities made possible by the regulatory flexibilities provided through the MTW Program. The activities that impact the HCV Program are as follows:

Table 1-1: Moving to Work (MTW) Activities

Activity #	Activity Description
1-2005	Special Referral Program: Center for Women & Families
2-2005	MTW inspections protocol
3-2006	HCV Homeownership Program: Distribution of HCV Homeownership Assistance
4-2007	Alternate year Re-Examinations of Disabled Families and Participant Families where Head, Co-Head, or spouse is at least 55 years of age
6-2008	Earned income disregard for Elderly Families
7-2008	Special Referral Program: Day Spring
8-2008	Standard medical deduction for Elderly and Disabled Families
11-2009	HCV Homeownership Program: Flexibility in third-party verifications
13-2009	HCV Homeownership Program: Exception payment standards
15-2009	Special Referral Program: Louisville Scholar House
17-2009	Multicultural Family Assistance Program
20-2010	Special Referral Program: Downtown Family Scholar House
27-2011	Deduction of Child Care Expenses for purpose of determining eligibility
29-2012	Special Referral Program: 100,000 Homes Initiative
30-2012	Special Referral Program: Stoddard Johnston Scholar House
31-2012	Elimination of earned income disregard for Non-Elderly Families
33-2012	Special Referral Program: Wellspring (Youngland Avenue facility)
34-2012	Special Referral Programs: Phoenix Hill Shelter + Care Initiative
35-2012	Special Referral Programs: Coalition for the Homeless, Wellspring (Bashford Manor and Ardery facilities), Choices Inc, Kentucky Cabinet for Health & Family Services/KHC
36-2013	Special Referral Program: Parkland Scholar House
39-2014	Contract rent increase limit
40-2014	Financial aid disregard in calculation of Total Tenant Payment
42-2015	Special Referral Program: Seven Counties Services, Inc.
43-2015	HUD/MDRC rent reform demonstration for HCV Households
44-2015	Combined reporting of MTW Special Referral Programs
45-2016	MTW Special Referral Program: Coalition for the Homeless “Move Up” Program (Pending HUD Approval)
46-2017	MTW Special Referral Program – Riverport Scholar House
47-2017	MTW Special Referral Program – ChooseWell Communities
48-2018	Local Project-Based Voucher Program
49-2018	Beecher Terrace CNI Revitalization – Broader Use of Funds to Support Development of Off-Site, Mixed-Income Replacement Housing

D. SUMMARY OF HOUSING AUTHORITY, OWNER, AND FAMILY RESPONSIBILITIES

1. Housing Authority Responsibilities

In administering the HCV Program, the LMHA will:

- a. Publish and disseminate information about the availability and nature of housing assistance under the Program;

- b. Explain the Program to Owners, Applicant Families, and Participant Families, including each party's rights and responsibilities under the Violence Against Women Act;
- c. Seek expanded opportunities for assisted Families to locate housing outside areas of poverty or racial concentration;
- d. Encourage Owners to make units available for leasing in the Program, including Owners of suitable units located outside areas of poverty or racial concentration;
- e. Affirmatively further fair housing goals and comply with equal opportunity requirements;
- f. Make efforts to help people with disabilities find satisfactory housing;
- g. Receive applications from Applicant Families, maintain the waiting list, determine eligibility, issue a Housing Choice Voucher to each selected Applicant Family, and provide housing information to Applicant Families selected;
- h. Determine who can live in the assisted unit at admissions and during the Participant Family's participation in the Program;
- i. Obtain and verify evidence of citizenship and eligible immigration status;
- j. Review the Applicant or Participant Family's request for approval of the tenancy and the Owner Lease, which must include the HUD prescribed tenancy addendum;
- k. Inspect the unit before the assisted occupancy begins and at least as often as required by HUD during the assisted tenancy;
- l. Determine the amount of the Housing Assistance Payment for the Participant Family;
- m. Determine the maximum Rent to Owner and whether the rent is reasonable;
- n. Make timely Housing Assistance Payments to the Owner in accordance with the Housing Assistance Payments contract;
- o. Examine Applicant Family income, size, and composition at admission and Participant Family income, size, and composition at least once every two years during the Family's participation in the Program. This examination will include verification of income and other Family information;
- p. Establish and periodically adjust the schedule of Utility Allowances;
- q. Administer and enforce the Housing Assistance Payments contract with the Owner, including taking appropriate action if the Owner defaults on the contract;
- r. Determine whether to terminate assistance to a Participant Family for the violation of family obligations;

- s. Conduct informal reviews of certain LMHA decisions concerning applications for participation in the Program;
- t. Conduct informal hearings on certain LMHA decisions concerning Participant Families;
- u. Provide sound financial management of the Program, including engaging an independent public accountant to conduct audits;
- v. Administer HUD-funded special HCV Programs (as applicable); and
- w. Administer a Family Self-Sufficiency (FSS) Program.

2. Owner Responsibilities²

The Owner is responsible for performing all of the Owner's obligations under the Housing Assistance Payments contract and the Lease, including the tenancy addendum. These obligations include, but are not limited to the following:

- a. Performing all management and rental functions for the assisted unit, including selecting a Voucher Holder to lease the unit, and deciding if the Family is suitable for tenancy of the unit. The fact that a Family Member is or has been a victim of Domestic Violence, Dating Violence, or Stalking is not an appropriate basis for denial of tenancy if the Family otherwise qualifies for tenancy;
- b. Maintaining the unit in accordance with the Housing Authority's standards for decent, safe, and sanitary housing, including performance of ordinary and extraordinary maintenance;
- c. Providing access to the unit for scheduled inspections;
- d. Complying with fair housing and equal opportunity requirements;
- e. Preparing and furnishing to the LMHA information required under the Housing Assistance Payments contract, including but not limited to, promptly giving the LMHA a copy of any Owner eviction notice;
- f. Collecting from the Applicant or Participant Family:
 - i. Any security deposit;
 - ii. The tenant contribution (the part of Rent to Owner not covered by the Housing Assistance Payment); and
 - iii. Any charges for unit damage by the Participant Family;
- g. Enforcing tenant obligations under the Lease;

² 24 CFR 982.452, Owner Responsibilities

- h. Paying for utilities and services (unless paid by the Participant Family under the Lease);
- i. For modifications to a dwelling unit occupied or to be occupied by a person with a disability (as described at 24 CFR 100.203); and
- j. For registering the assisted unit in the Louisville Metro Rental Registry.³

3. Participant Family Responsibilities⁴

Participant Family obligations include, but are not limited to, the following:

- a. Supplying required information:
 - i. The Participant Family must supply any information that the LMHA or HUD determines is necessary in the administration of the HCV Program, including submission of required evidence of citizenship or eligible immigration status. Information includes any requested certification, release, or other documentation;
 - ii. The Participant Family must supply any information requested by the LMHA or HUD for use in a regularly scheduled Re-Examination or Interim Re-Examination of Family income and composition in accordance with HUD requirements;
 - iii. The Participant Family must disclose and verify Social Security Numbers and must sign and submit consent forms for obtaining information; and
 - iv. All information supplied by the Participant Family must be true and complete;
- b. Not causing, or allowing Guests to cause, any breach of the Housing Authority's standards for decent, safe, and sanitary units, as determined by the LMHA;
- c. Allowing the LMHA to inspect the unit at reasonable times and after at least two days Written Notification, as required by state law;
- d. Not committing any serious or repeated violation of the Lease. An incident or incidents of actual or threatened Domestic Violence, Dating Violence, or Stalking will not be construed as a serious or repeated Lease violation by the victim (or threatened victim) of Domestic Violence, Dating Violence, or Stalking, or as good cause to terminate the tenancy, occupancy rights, or assistance of the victim;
- e. Notifying the LMHA and the Owner (and receiving the Housing Authority's approval if the Participant Family wishes to receive continued assistance) before

³ Additional information regarding rental property registration can be found at: <https://louisvilleky.gov/government/codes-regulations/rental-registry>

⁴ 24 982.551, Obligations of Participant

the Participant Family moves out of the unit or terminates the Lease on notice to the Owner;

- f. Promptly giving the LMHA a copy of any Owner eviction notice;
- g. Regarding the use and occupancy of the unit:
 - i. The Participant Family must use the assisted unit for residence by the Family. The unit must be the Family's only residence;
 - ii. The LMHA must approve the composition of the Participant Family residing in the unit. The Family must inform the LMHA within 10 calendar days of the birth, adoption, or court-awarded custody of a child. The Family must request LMHA approval to add any other Family Member as an occupant of the unit. No other person (i.e., no one but Members of the assisted Family) may reside in the unit except for a Foster Child, Foster Adult, or Live-In Aide as provided in paragraph (iv) of this section;
 - iii. The Participant Family must promptly notify the LMHA within 10 calendar days if any Family Member no longer resides in the unit;
 - iv. If the LMHA has given approval, a Foster Child, Foster Adult, or Live-In Aide may reside in the unit. The Housing Authority has the discretion to adopt reasonable policies concerning residence by a Foster Child, Foster Adult, or Live-In Aide and to define when LMHA consent may be given or denied;
 - v. Household Members may engage in legal profitmaking activities in the unit, but only if such activities are incidental to primary use of the unit for residence by Participant Family Members. Any business uses of the unit must comply with the Lease, zoning requirements, and the affected Household Member must obtain all appropriate licenses;
 - vi. The Participant Family must not sublease or let the unit; and
 - vii. The Participant Family must not assign the Lease or transfer the unit;
- h. Regarding any absence of all Participant Family Members from the unit:⁵
 - i. The Participant Family must supply any information or certification requested by the LMHA to verify that the Family is living in the unit, or relating to Family absence from the unit, including any Housing Authority requested information or certification on the purposes of Family absences. The Family must cooperate with the LMHA for this purpose;
 - ii. Utilities must be maintained and rent paid during any absence of the Participant Family from the unit;

⁵ 24 CFR 982.312, Absence from Unit

- iii. The Participant Family must promptly notify the LMHA of its absence from the unit if the entire Family will be absent from the unit for more than 30 calendar days. The Family must request permission from the Housing Authority for absences exceeding 120 calendar days; and
- iv. Authorizations for absences of more than 120 calendar days will only be granted in limited circumstances, when such absences are deemed necessary by the LMHA. Such absences include, but are not limited to, prolonged hospitalization, death in the Family, and other Family Member illnesses;
- i. Not owning or having any interest in the unit (except for Owners of a Manufactured Home renting the Manufactured Home Space or Participant Families using a Housing Choice Voucher to purchase a home);
- j. Not committing fraud, bribery, or any other corrupt or criminal act in connection with the HCV Program;
- k. Not engaging in Drug-Related Criminal Activity or Violent Criminal Activity or other criminal activity that threatens the health, safety, or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the Premises. Criminal activity directly related to Domestic Violence, Dating Violence, or Stalking, engaged in by a Household Member or Guest or any Other Person Under the Tenant's Control, shall not be cause for termination of tenancy, occupancy rights, or assistance of the victim, if the Tenant or Immediate Family Member of the Tenant is the victim;
- l. Not abusing alcohol in a way that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the Premises;
- m. Not receiving HCV tenant-based assistance while receiving another housing subsidy, for the same unit or for a different unit, under any duplicative (as determined by HUD or in accordance with HUD requirements) federal, state or local housing assistance program.

2. PROVIDING EQUAL ACCESS

A. FAIR HOUSING¹

It is the policy of the Louisville Metro Housing Authority (LMHA) to comply fully with all federal, state, and local nondiscrimination laws; the Americans with Disabilities Act; and the U.S. Department of Housing and Urban Development (HUD) regulations governing fair housing and equal opportunity.

No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, disability, marital status, or perceived or actual Sexual Orientation or Gender Identity, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the Housing Authority's housing programs.

No inquiries shall be made about a person's Sexual Orientation or Gender Identity. However, the LMHA may inquire about a person's sex in order to determine the number of bedrooms a Household may be eligible for under the Housing Authority's occupancy standards or to accurately complete Form HUD-50058 or Form HUD-50058 MTW.

To further its commitment to and full compliance with applicable civil rights laws, the LMHA will provide information to Applicant and Participant Families regarding fair housing laws and any recourse available to them if they believe they may be victims of illegal discrimination. Such information will be made available with the full application, and applicable fair housing information and discrimination complaint forms will be made available at the Housing Authority's offices. In addition, appropriate written information and advertisements will contain suitable equal opportunity language and the HUD Office of Fair Housing and Equal Opportunity logo.²

The LMHA will assist any Family that believes they have suffered illegal discrimination by providing them with a copy of Form HUD-903.1, *Are You a Victim of Housing Discrimination?*, in their preferred language when available. A copy of this form is available in Appendix 3.A of this Plan. Form HUD-903.1 can also be completed and submitted online at the following web address:

http://portal.hud.gov/hudportal/HUD?src=/topics/housing_discrimination

Versions of Form HUD-903.1 in Arabic, Cambodian, Chinese, English, Korean, Russian, Somali, Spanish, and Vietnamese can be downloaded from:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/forms/hud9

¹ 24 CFR 982.53, "Equal Opportunity Requirements and Protection for Victims of Domestic Violence, Dating Violence, or Stalking"; 24 CFR 982.304, "Illegal Discrimination: PHA Assistance to Family"; PIH 2014-20, *Program Eligibility Regardless of Sexual Orientation, Gender Identity or Marital Status as Required by HUD's Equal Access Rule*

² The FHEO logo can be downloaded from:

<http://portal.hud.gov/hudportal/HUD?src=/library/bookshelf/1/hudgraphics/fheologo>

If requested, the Housing Authority will assist Families as appropriate to ensure equal access, and will provide the address of the nearest HUD Office of Fair Housing and Equal Opportunity. The address of the office nearest to the Housing Authority's jurisdiction is as follows:

Atlanta Regional Office of FHEO
U.S. Department of Housing and Urban Development
Five Points Plaza
40 Marietta Street, 16th Floor
Atlanta, Georgia 30303-2806

Phone: (404) 331-5140
Toll-Free: (800) 440-8091
TTY (Text Telephone): (404) 730-2654
Fax: (404) 331-1021
Email: complaints_office_04@hud.gov

Families that believe they have suffered illegal discrimination may also file a complaint locally with the Louisville Metro Human Relations Commission:³

Louisville Metro Human Relations Commission
410 West Chestnut Street
Suite 300A
Louisville, KY 40202

Phone: (502) 574-3631
TTY (Text Telephone): (502) 574-4332

A copy of the discrimination complaint form used by this agency is available at the following web address:

http://louisvilleky.gov/sites/default/files/human_relations/lmhrc_complaint_management_system_form.pdf

The LMHA will keep records of all fair housing complaints, investigations, notices, and corrective actions for five years.

B. REASONABLE ACCOMMODATION⁴

1. Overview

Sometimes a person with a disability may need a Reasonable Accommodation (Accommodation) in order to take full advantage of the Housing Authority's Housing

³ Louisville / Jefferson County Metro Government Code of Ordinances, 92.03, "Unlawful Practices in Connection with Housing"

⁴ Joint Statement of HUD and the Department of Justice, *Reasonable Modifications Under the Fair Housing Act*, 5 March 2008.

Choice Voucher (HCV) Program and related services. When such an Accommodation is granted it does not confer special treatment or advantage for the person with a disability; rather, such Accommodation makes the Program fully accessible to them in a way that would otherwise not be possible due to their disability.

Because disabilities are not always readily apparent, the LMHA will ensure that all Applicant and Participant Families are aware of the opportunity to request a Reasonable Accommodation. Any LMHA Written Notification that requires an Applicant or Participant Family to take an action will include information about requesting a Reasonable Accommodation. Such Notifications include, but are not limited to, notices of Re-Examination, inspection, appointment, and termination of assistance.

The LMHA prefers (but does not require) that Families use the Housing Authority's Request for Reasonable Accommodation form when requesting an Accommodation. Forms are given to all Applicant Families at the time they begin the full application process. In addition, forms are available at the Housing Authority's 801 Vine Street Office, Central Office, or any of its public housing site management offices during normal operating hours. A copy of the request form can also be found in Appendix 3.B of this Plan.

All decisions granting or denying requests will be in writing. Any request for an Accommodation that would enable a Participant Family to materially violate Family obligations will not be approved.

2. Evaluating a Request for Reasonable Accommodation

The LMHA will consider the following questions when evaluating a request for Reasonable Accommodation:

a. Is the requestor or a Household Member a person with a disability?

When evaluating requests for Reasonable Accommodation, the LMHA uses a different definition of the term "person with a disability" than the one found in the Glossary of this Plan. For this purpose only, the definition provided in the Fair Housing Act is used:⁵

"The Act defines a person with a disability to include

- (1) individuals with a physical or mental impairment that substantially limits one or more major life activities;
- (2) individuals who are regarded as having such an impairment; or
- (3) individuals with a record of such an impairment.

The term 'physical or mental impairment' includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, Human Immunodeficiency Virus (HIV) infection, mental

⁵ 42 U.S.C. § 12102, "Definition of Disability"

retardation, emotional illness, drug addiction (other than addiction caused by current, illegal use of a controlled substance) and alcoholism.

The term ‘substantially limits’ suggests that the limitation is ‘significant’ or ‘to a large degree.’

The term ‘major life activity’ means those activities that are of central importance to daily life, such as seeing, hearing, walking, breathing, performing manual tasks, caring for one’s self, learning, and speaking. This list of major life activities is not exhaustive.”⁶

If the disability is apparent or already documented, the answer to the question, “Is the requestor or a Household Member a person with a disability?” is yes. If the disability is not apparent or documented, the LMHA will obtain verification that the person requesting the Accommodation is a person with a disability.

Depending on the person’s circumstances, information verifying that the person meets the definition of disability can usually be provided by the individual (e.g., proof that an individual under 65 years of age receives Supplemental Security Income or Social Security Disability Insurance benefits or a credible statement by the individual). A doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability may also provide verification of a disability.

b. Is the requested Accommodation related to the disability?

If it is apparent that the request is related to the apparent or documented disability, the answer to this question is yes. If it is not apparent, the LMHA will obtain documentation that the requested Accommodation is needed due to the disability. The Housing Authority will not inquire as to the nature of the disability.

Generally the individual knows best what they need; however, the LMHA retains the right to be shown how the requested Accommodation enables the individual to access or use the Housing Authority’s programs or services.

*c. Is the requested Accommodation reasonable?*⁷

In order to be determined reasonable, the Accommodation must meet two criteria:

i. The Accommodation must not constitute a fundamental alteration

The Housing Authority’s business is housing. If the request would alter the fundamental business that the LMHA conducts, that would not be reasonable. For instance, the Housing Authority would deny a request to have the LMHA do grocery shopping for the person with a disability.

⁶Ibid, pages 3-4.

⁷ 24 CFR 8.6, “Nondiscrimination Based on Handicap in Federally Assisted Programs and Activities of the Department of Housing and Urban Development: General Provisions: Communications”

- ii. The Accommodation must not create an undue financial hardship or administrative burden

Frequently the requested Reasonable Accommodation costs little or nothing. If the cost would be an undue burden, the LMHA may request a meeting with the individual to investigate and consider equally effective alternatives.

If more than one Accommodation is equally effective in providing access to the Housing Authority's programs and services, the LMHA retains the right to select the most efficient or economic choice.

3. Requests to Physically Modify the Dwelling Unit

If the Applicant or Participant Family requests, as a Reasonable Accommodation, that they be permitted to make physical modifications to their dwelling unit at their own expense, the request should be made to the property Owner. The LMHA does not have responsibility for the Owner's unit and does not have responsibility to make the unit accessible. The Housing Authority may, however, grant a higher Payment Standard for units where property Owners make physical modifications for a person with a disability so long as the Payment Standard does not exceed 110% of Fair Market Rent.

C. SERVICES FOR INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY

The LMHA shall do its best, within reason, to assist individuals with limited English proficiency. Following an assessment of the needs of such persons within its jurisdiction, the Housing Authority has prepared a Language Access Plan, which can be found in Appendix 4.

D. OUTREACH

1. Family Outreach⁸

The LMHA will publicize, when appropriate, the availability and nature of the HCV Program for Extremely Low-Income and Very Low-Income Families in a newspaper of general circulation, minority media, and by other suitable means.

The LMHA will communicate the status of Program availability to other service providers in the community and advise them of housing eligibility factors and guidelines so that they can make proper referral of their clients to the Program.

The objective of this effort is to develop a waiting list that is representative of our low-income community. A particular emphasis will be placed on attracting eligible individuals and families least likely to apply for the HCV Program.

⁸ *HCV Program Guidebook*, Chapter 4.3, "Conducting Outreach to Families"

2. Owner Outreach⁹

The LMHA employs a Landlord Relations Specialist, who conducts regular outreach to Owners within the Housing Authority's jurisdiction, including Owners of suitable units located outside of areas of low-income or minority concentration and Owners of accessible units.

Owner outreach materials are available online through the Housing Authority's website (www.lmha1.org). These materials explain how the HCV Program works; how the Program benefits Owners; and Owners' responsibilities under the Program.

E. PRIVACY PROTECTIONS¹⁰

All Adult Family Members are periodically required to sign the Housing Authority's HUD-approved local version of Form HUD-9886, *Authorization for Release of Information and Privacy Act Notice*. This notice states how Family information will be released and includes the *Federal Privacy Act Statement*.

No third-party request for Applicant or Participant Family or Household information will be released unless there is a signed release of information request from the Applicant or Participant or unless required by law.

F. PROTECTIONS AGAINST DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, AND STALKING¹¹

1. Protections Provided Under the Violence Against Women Act¹²

The LMHA will provide notice to HCV Applicant and Participant Families of the following protections available to them under the Violence Against Women and Department of Justice Reauthorization Act of 2005, as amended (see Appendix 3.C for a copy of this notice). Such notice will also describe the limitations of these protections, and will be provided together with Form HUD-50066, *Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking* (see Appendix 3.D). Notice will be provided at the time an Applicant or Participant is admitted to or denied residency in a dwelling unit and with any notification of eviction or termination of assistance.

⁹ *HCV Program Guidebook*, Chapter 2.4, "Outreach to Owners"

¹⁰ 24 CFR 5.212, "Compliance with the Privacy Act and Other Requirements"; 24 CFR 5.230, "Consent by Assistance Applicants and Participants"; 24 CFR 982.551, "Obligations of Participant"

¹¹ 24 CFR 982.53, "Equal Opportunity Requirements and Protection for Victims of Domestic Violence, Dating Violence, or Stalking"

¹² 24 CFR 5.2005, "VAWA Protections"; 24 CFR 5.2009, "Remedies Available to Victims of Domestic Violence, Dating Violence, or Stalking in HUD-Assisted Housing," as updated by 78 FR 47717, *The Violence Against Women Reauthorization Act of 2013: Overview of Applicability to HUD Programs*, 6 August 2013. See also: Henriquez, Sandra B, "Letter from the HUD Assistant Secretary for Public and Indian Housing to Public Housing Agency Executive Directors," 30 September 2013.

These protections are equally available to both men and women and are available regardless of perceived or actual Gender Identity or Sexual Orientation.

Notice will also be provided to Owners of their rights and obligations under the Act.

a. Protections Available to Applicant Families

Admission to the HCV Program shall not be denied on the basis that the Applicant is or has been a victim of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, if the Applicant otherwise qualifies for assistance or admission.

b. Protections Available to Participant Families

- i. An incident or incidents of actual or threatened Domestic Violence, Dating Violence, Sexual Assault, or Stalking will not be construed as a serious or repeated Lease violation by the victim or threatened victim of the Domestic Violence, Dating Violence, Sexual Assault, or Stalking, or as good cause to terminate the tenancy of, occupancy rights of, or assistance to the victim;
- ii. Criminal activity directly related to Domestic Violence, Dating Violence, Sexual Assault, or Stalking, engaged in by a Household Member or any Guest or Other Person Under the Tenant's Control, shall not be cause for termination of tenancy of, occupancy rights of, or assistance to the victim, if the Tenant or an Affiliated Individual of the Tenant is the victim;
- iii. The LMHA or Owner may Bifurcate a Lease, or remove a Household Member from a Lease without regard to whether the Household Member is a signatory to the Lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any Tenant or lawful occupant who engages in criminal activity directly relating to Domestic Violence, Dating Violence, Sexual Assault, or Stalking against an Affiliated Individual or other individual, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is a Tenant or lawful occupant;
- iv. The LMHA and Owner will honor court orders addressing rights of access to or control of the property, including civil protection orders issued to protect the victim and to address the distribution of property among Household Members in a case where a Family breaks up; and
- v. Any protections provided by law that give greater protection to the victim are not superseded by these provisions.¹³

c. Limitations of Available Protections

¹³ 24 CFR 5.2011, "Effect on Other Laws"

- i. Nothing in this Section 2.F limits the ability of the LMHA or Owner to evict a Tenant or terminate assistance for a Lease violation unrelated to Domestic Violence, Dating Violence, Sexual Assault, or Stalking, provided the LMHA or Owner does not subject such a Tenant to a more demanding standard than other Tenants in making the determination whether to evict, or to terminate assistance or occupancy rights; and
- ii. Nothing in this Section 2.F may be construed to limit the authority of the LMHA or an Owner to evict or terminate assistance to any Tenant or lawful occupant if the Housing Authority or Owner can demonstrate an Actual and Imminent Threat to other Tenants or to those employed at or providing service to the HCV Program assisted property. In this context, words, gestures, actions, or other indicators will be considered an Actual and Imminent Threat if they meet the standards provided in the Glossary definition of this term.

Any eviction or termination of assistance as a result of an Actual and Imminent Threat will be utilized by the LMHA or Owner only when there are no other actions that could be taken to reduce or eliminate the Threat, including, but not limited to, transferring the victim to a different unit, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat. Restrictions predicated on public safety cannot be based on stereotypes, but must be tailored to particularized concerns about individual Participants.

2. Documenting the Occurrence of Domestic Violence, Dating Violence, Sexual Assault, or Stalking¹⁴

a. Request for Documentation

The law allows, but does not require, the LMHA or an Owner to request documentation that an incident or incidents of actual or threatened Domestic Violence, Dating Violence, Sexual Assault, or Stalking claimed by a Tenant or other lawful occupant is bona fide and meets the requirements of the applicable definitions set forth in this policy. The Housing Authority shall require verification in all cases where an individual claims protection against an action involving such individual proposed to be taken by the LMHA. Owners may elect to require documentation, or not to require it, as permitted under applicable law. The request for documentation must be in writing.

If requested, documentation must be provided to the LMHA or to the Owner within 14 Business Days after the date that the individual received the request for documentation, although an Owner may elect to provide additional time at their discretion.

¹⁴ 24 CFR 5.2007, “Documenting the Occurrence of Domestic Violence, Dating Violence, or Stalking”

b. Forms of Documentation

Documentation of a claimed incident or incidents of actual or threatened Domestic Violence, Dating Violence, Sexual Assault, or Stalking may be accomplished in one of the following ways:

i. HUD-Approved Certification Form (Form HUD-50066)

Documentation may consist of a HUD-approved certification form (Form HUD-50066) indicating that the individual is a victim of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and that the incident or incidents in question are bona fide incidents of such actual or threatened abuse. Such certification must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim, and may be based solely on the personal signed attestation of the victim. A copy of Form HUD-50066 can be found in Appendix 3.D;

ii. Police or Court Record

Documentation may consist of a federal, state, tribal, territorial, or local police report or court record;

iii. Administrative Agency Record

Documentation may consist of a record of an administrative agency; or

iv. Other Documentation

Other documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical or mental health professional, from whom the victim has sought assistance in addressing Domestic Violence, Dating Violence, Sexual Assault, or Stalking, or the effects of abuse, in which the professional attests under penalty of perjury to the professional's belief that the incident or incidents in question are bona fide incidents of abuse, and the victim of Domestic Violence, Dating Violence, Sexual Assault, or Stalking has signed or attested to the documentation.

c. Confidentiality

Any documentation provided, including the fact that the individual is a victim of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, will be kept confidential by the LMHA or Owner. The LMHA or Owner will not:

- i. Enter the information contained in the documentation into any shared database;
- ii. Allow employees of the LMHA or Owner or those within their employ (e.g., contractors) to have access to such information unless explicitly authorized by the Housing Authority or Owner for reasons that specifically call for these employees or those within their employ to have access to this information;

iii. Disclose this information to any other entity or individual, except to the extent that disclosure is:

- (A) Requested or consented to by the individual submitting the documentation in writing;
- (B) Required for use in an eviction proceeding; or
- (C) Otherwise required by applicable law.

d. Failure to Provide Documentation

Failure to provide documentation in accordance with the LMHA or Owner's written request will result in loss of protection under the Violence Against Women Act and under this policy against any proposed adverse action. The submission of false information may be the basis for the termination of assistance or for eviction.

e. Managing Conflicting Documentation

In cases where the LMHA or Owner receives conflicting certification documents from two or more Household Members, each claiming to be a victim and naming one or more of the other petitioning Household Members as the perpetrator, the Housing Authority or Owner may determine which is the true victim by requiring third-party documentation as described in Section 2.F.2.b, subparagraphs ii, iii, or iv and in accordance with any HUD guidance as to how such determinations will be made.

G. HCV PROGRAM INFORMATION TO BE POSTED IN LMHA OFFICES

The LMHA will post, in each of its offices in a conspicuous place and at a height easily read by all persons, including persons with mobility disabilities, the following information:

1. The Housing Choice Voucher (HCV) Administrative Plan;¹⁵
2. Notice of the status of the waiting list (opened or closed);
3. Addresses of all LMHA offices, telephone numbers, TDD (Telecommunications Device for the Deaf) numbers, and hours of operation;
4. Income limits for admission;
5. Informal review and informal hearing procedures;
6. Fair Housing Poster;¹⁶
7. Equal Opportunity in Employment Poster; and

¹⁵ 24 CFR 982.54, "Administrative Plan"

¹⁶ 24 CFR 110.15, "Location of Posters"

8. The Housing Authority's SEMAP score and designation.¹⁷

¹⁷ Public Housing Agencies that participate in HUD's Moving to Work (MTW) Demonstration Program, including the LMHA, are exempt from the SEMAP process. Instead, these agencies maintain a "High Performer" status for the duration of their participation in the MTW Program.

3. ELIGIBILITY FOR AND DENIAL OF ASSISTANCE

A. ELIGIBILITY CRITERIA¹

In order to be eligible for admission to the Housing Choice Voucher (HCV) Program, the Applicant Family must meet all eligibility criteria described in this Section 3.A.

Applicant Families will also be screened against the Louisville Metro Housing Authority's (LMHA) grounds for denial, listed in Section 3.B of this Administrative Plan, and must pass any additional Owner screening standards (see Section 6.H).

1. Family Status Eligibility Criteria

All Families must have a Head of Household or Co-Heads of Household.

Regardless of actual or perceived Sexual Orientation, Gender Identity, or marital status, Family includes, but is not limited to, the following:

a. *A Family with or without Children*

Such a Family is defined as a group of people related by blood, marriage, adoption, or affinity that lives together in a stable Family relationship:

- i. Children temporarily absent from the home due to placement in foster care are considered Family Members; and
- ii. Unborn children are considered Family Members for purposes of determining bedroom size, but are not considered Family Members for determining income limit.

b. *An Elderly Family*

- i. A Family whose Head (including Co-Head), spouse, or sole Member is a person who is at least 62 years of age;
- ii. Two or more persons who are at least 62 years of age living together; or
- iii. One or more persons who are at least 62 years of age living with one or more Live-In Aides.

c. *A Near-Elderly Family*

- i. A Family whose Head (including Co-Head), spouse, or sole Member is a person who is at least 50 years of age but below the age of 62;

¹ 24 CFR 982.201, "Eligibility and Targeting"

- ii. Two or more persons who are at least 50 years of age but below the age of 62 living together; or
- iii. One or more persons who are at least 50 years of age but below the age of 62 living with one or more Live-In Aides.

d. A Disabled Family

- i. A Family whose Head (including Co-Head), spouse, or sole Member is a Person with a Disability;
- ii. Two or more Persons with Disabilities living together; or
 - (A) One or more Persons with Disabilities living with one or more Live-In Aides.
 - (B) For purposes of qualifying for low-income housing, does not include a person whose disability is based solely on any drug or alcohol dependence.

e. A Displaced Family

A Family in which each Member, or whose sole Member, has been displaced by governmental action, or whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to federal disaster relief laws.

f. A Remaining Member of a Tenant Family

A Family Member of an assisted Family who remains in the unit when other Family Members have left the unit. The person must have been previously approved by the LMHA to be living in the unit.

If the only remaining Family Members are minor children, in order for the Family to continue to receive assistance:²

- i. The minor must be an Emancipated Minor who is legally able to execute a contract or Lease in the Commonwealth of Kentucky; or
- ii. The LMHA must receive verification from Child Protective Services and/or the Family Court indicating that another Adult is to move into the assisted unit to care for the minor child(ren). The Adult caretaker will be treated as a visitor until a legal determination of custody or guardianship has been made (up to a maximum of 180 calendar days), at which time the Adult, provided they are determined to be eligible for admission to the Housing Authority's HCV Program, will be designated Head of Household.

Should the Family Court determine that it is in the minor child(ren)'s best interest to be temporarily absent from the unit while legal custody or guardianship is

² PIH 2010-9, *Effective Use of the Enterprise Income Verification (EIV) System's Deceased Tenants Report to Reduce Subsidy Payment & Administrative Errors*

being determined, the LMHA will continue to make Housing Assistance Payments on the Family's behalf for up to 180 calendar days. By the end of this period, a legal guardian (who is eligible for admission to the Housing Authority's HCV Program) must have been appointed and be living in the unit with the minor child(ren), or assistance will be terminated.

g. A Single Person

A person who is not an Elderly or Displaced Person, or a Person with Disabilities, or the Remaining Member of a Tenant Family.

2. Income Eligibility Criteria

- a. To be income-eligible, the Applicant must be a Family in any of the following categories:
 - i. A Very Low-Income Family;
 - ii. A Low-Income Family that is Continuously Assisted under the 1937 Housing Act;
 - iii. A Low-Income Family that qualifies for voucher assistance as a non-purchasing Family residing in a:
 - (A) HOPE 1 (HOPE for public housing homeownership) project;
 - (B) HOPE 2 (HOPE for homeownership of multifamily units) project; or
 - (C) A project subject to a resident homeownership program under 24 CFR 248.173; or
 - iv. A Low-Income or Moderate-Income Family that is displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing.³
- b. The applicable income limit for issuance of a Housing Choice Voucher when a Family is selected for the HCV Program is the highest income limit (for the Family size) for areas in the LMHA jurisdiction. The applicable income limit for admission to the Program is the income limit for the area where the Family is initially assisted in the Program. At admission, the Family may only use the Voucher to rent a unit in an area where the Family is income eligible. This means that:
 - i. Families who are moving into the Housing Authority's jurisdiction under Portability and have the status of Applicant rather than of Participant at their Initial Housing Authority must meet the income limit for the area where they are initially assisted under the HCV Program; and
 - ii. Families who are moving into the Housing Authority's jurisdiction under

³ The term "eligible low-income housing" is defined at 24 CFR 248.101, "Prepayments and Plans of Action Under the Low Income Housing Preservation and Resident Homeownership Act of 1990: Definitions"

Portability and are already Program Participants at their Initial Housing Authority do not have to meet the income eligibility requirement for the LMHA Program.⁴

- c. Income limits apply only at admission and are not applicable for continued occupancy; however, as income rises the assistance will decrease.
- d. Income limit restrictions do not apply to Families transferring units within the Housing Authority's HCV Program.

3. Citizenship / Eligible Immigrant Status Eligibility Criteria⁵

a. Family Eligibility for Assistance

- i. To be eligible for HCV assistance every Family Member must be a Citizen, National, or a Noncitizen who has eligible immigration status under one of the categories set forth in Section 214 of the Housing and Community Development Act of 1980.⁶
- ii. Despite the ineligibility of one or more Family Members, a Mixed Family may be eligible for one of three types of preservation assistance.⁷
 - (A) Continued assistance;⁸
 - (B) Temporary deferral of termination of assistance;⁹ or
 - (C) Prorated assistance (A Mixed Family must be provided prorated assistance if the Family so requests).¹⁰
- iii. A Family without any eligible Family Members and receiving assistance on June 19, 1995, may be eligible for temporary deferral of termination of assistance.

b. Preferences

Citizens of the Republic of Marshall Islands, the Federated States of Micronesia, and the Republic of Palau, who have eligible immigration status under one of the categories set forth in Section 214 of the Housing and Community Development Act of 1980, are entitled to receive local preferences for housing assistance, except that, within Guam, such Citizens who have such local preference will not

⁴ 24 CFR 982.353, "Where Family Can Lease a Unit with Tenant-Based Assistance"

⁵ 24 CFR 5.506, "Restrictions on Assistance to Noncitizens: General Provisions"

⁶ See 42 U.S.C. 1436a(a), "Restriction on Use of Assisted Housing by Non-Resident Aliens"

⁷ 24 CFR 5.516, "Availability of Preservation Assistance to Mixed Families and Other Families." See Section 7.C of this Administrative Plan for rent calculations for Mixed Families.

⁸ 24 CFR 5.518(a), "Types of Preservation Assistance Available to Mixed Families and Other Families: Continued Assistance"

⁹ 24 CFR 5.518(b), "Types of Preservation Assistance Available to Mixed Families and Other Families: Temporary Deferral of Termination of Assistance"

¹⁰ 24 CFR 5.520, "Proration of Assistance"

be entitled to housing assistance in preference to any U.S. Citizen or National resident therein who is otherwise eligible for such assistance.

c. All Adult Family Members Must Have Legal Ability to Sign a Lease

All Adults must be able to sign the Lease. If the Commonwealth of Kentucky should forbid individuals with ineligible immigration status from executing contracts (i.e., Leases or other legal binding documents), then they would be ineligible for the HCV Program.

4. Social Security Number Disclosure Eligibility Criteria¹¹

a. Applicant Household Disclosure of Social Security Numbers

i. Required Disclosure Prior to Admission of Applicant Family

Prior to admission, every Household Member regardless of age must provide LMHA with a complete and accurate Social Security Number with the exception of Household Members who meet the criteria for any one of the exceptions described in section 3.A.4.a.ii of this Administrative Plan.

If any Household Member has not yet disclosed his or her Social Security Number at the time the Family reaches the top of the waiting list, the LMHA will request in writing that the Household Member(s) disclose and document their Social Security Number within 30 calendar days. The Family will maintain their position on the waiting during this period of time. However, if all Household Members have not disclosed and documented their Social Security Number at the time a Housing Choice Voucher becomes available, the Housing Authority will offer the Voucher to the next eligible Applicant Family on the waiting list. If the Family fails to disclose and document the Household Member's Social Security Number within 30 calendar days, the Family will be removed from the waiting list.

ii. Exceptions to Required Disclosure Prior to Admission

Household Members who meet any one of the following exceptions can be admitted to the HCV Program without prior disclosure and/or verification of a Social Security Number:

(A) Household Members Who Do Not Contend Eligible Immigration Status

No post-admission verification of Social Security Number is required.

¹¹ 24 CFR 5.216, "Disclosure and Verification of Social Security and Employer Identification Numbers"; PIH 2012-10, *Verification of Social Security Numbers (SSNs), Social Security (SS) and Supplemental Security Income (SSI) Benefits; and Effective Use of the Enterprise Income Verification (EIV) System's Identity Verification Report*. For additional information regarding the verification of Social Security Numbers, see Section 10.D.

(B) Household Members Under the Age of Six Who Were Added to the Applicant's Household Within the Six-Month Period Prior to the Effective Date of the Housing Assistance Payment Contract

Applicant Families that include such a Household Member(s) will be given 90 calendar days from the effective date of the Housing Assistance Payment contract to provide documentation of a complete and accurate Social Security Number. LMHA will grant one additional 90-day grace if the Housing Authority determines that the Family's failure to comply with the Social Security Number documentation requirement was due to unforeseen circumstances and outside the control of the Family. If upon the expiration of the provided time period, the Family fails to comply with the Social Security Number disclosure and documentation requirements, LMHA will terminate the Family's assistance.

(C) Homeless Applicants to the Housing Authority's YMCA or St. Vincent DePaul Single Room Occupancy Programs¹²

Such Applicants may be admitted to the HCV Program without disclosing a Social Security Number. However, the individual must provide LMHA with such documentation within 90 calendar days from the date of admission. The Housing Authority may grant the individual one 90-day extension, if the LMHA determines that the individual's failure to comply with the Social Security Number documentation requirement was due to unforeseen circumstances and outside the control of the Family. If upon the expiration of the provided time period, the individual fails to comply with the Social Security Number disclosure and documentation requirements, the LMHA will terminate the individual's assistance.

b. Participant Household Disclosure of Social Security Numbers

The provisions below apply to all Household Members unless they do not contend eligible immigration status:

i. Social Security Numbers Not Previously Disclosed

If a person is already a Household Member and has not disclosed his or her Social Security Number, it must be disclosed at the next Regularly-Scheduled or Interim Re-Examination.

ii. Assignment of a New Social Security Number

If a Household Member has been assigned a new Social Security Number, it must be disclosed at the next Regularly-Scheduled or Interim Re-Examination.

¹² See Appendix 8 for more information about these programs.

iii. Elderly Household Members

Household Members age 62 or older as of January 31, 2010, whose initial eligibility determination was begun before January 31, 2010, are exempt from the required disclosure of their Social Security Number. This exemption continues even if the individual moves to a new assisted unit.

iv. New Household Members Age Six or Older

New Household Members age six or older must provide a complete and accurate Social Security Number prior to being added to the Household.

v. New Household Members Under the Age of Six

If the new Household Member is under the age of six and has not been assigned a Social Security Number, the Family will have 90 calendar days after the child is added to the Household to provide a complete and accurate Social Security Number. The Housing Authority may grant one 90-day extension for newly added Household Members under the age of 6 if in its sole discretion it determines that the Family's failure to comply was due to circumstances that could not have reasonably been foreseen and was outside the control of the Family.

5. Consent Authorization Documents Eligibility Criteria¹³

- a. In order to be eligible for the HCV Program, each Family Member who is at least 18 years of age and each Family Head, Co-Head, and spouse regardless of age, shall sign one or more Consent Forms.
- b. The Consent Form(s) must contain, at a minimum, the following:
 - i. A provision authorizing HUD and the LMHA to obtain from State Wage Information Collection Agencies any information or materials necessary to complete or verify the application for participation or for eligibility for continued occupancy;
 - ii. A provision authorizing HUD or the LMHA to verify with previous or current employers Income Information pertinent to the Family's eligibility for or level of assistance;
 - iii. A provision authorizing HUD to request income return information from the Internal Revenue Service and the Social Security Administration for the sole purpose of verifying Income Information pertinent to the Family's eligibility or level of benefits; and
 - iv. A statement that the authorization to release the information requested by the Consent Form expires 24 months after the date the Consent Form is signed.¹⁴

¹³ 24 CFR 5.230, "Consent by Assistance Applicants and Participants"; 24 CFR 5.232, "Penalties for Failing to Sign Consent Forms"

See Appendix 10 for alternate requirements applicable only to alternate rent policy group Families.

6. College Student Eligibility Criteria¹⁵

No assistance shall be provided under the HCV Program to any individual who:

- a. Is enrolled as a Student at an institution of higher education;¹⁶
- b. Is under 24 years of age;
- c. Is not a Veteran of the U.S. military;
- d. Is unmarried;
- e. Does not have a Dependent child;
- f. Is not a Person with Disabilities and was not receiving assistance under section 8 of the U.S. Housing Act of 1937 Act as of November 30, 2005; and
- g. Is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible on the basis of income to receive assistance through the HCV Program.

B. GROUNDS FOR DENIAL¹⁷

1. LMHA Grounds for Denial¹⁸

The LMHA will deny assistance to any Applicant Family, or Household Member thereof, who:¹⁹

- a. Does not meet one or more of the eligibility criteria listed in Section 3.A of this Administrative Plan;
- b. Fails to complete any aspect of the application or lease-up process;

¹⁴ MTW Activity #4-2007, “Rent Simplification for PH and HCV Programs - Alternate Year Reexaminations of Elderly and Disabled Families,” as amended in the Housing Authority’s FY 2014 MTW Annual Plan

¹⁵ 24 CFR 5.612, “Restrictions on Assistance to Students Enrolled in an Institution of Higher Education”

¹⁶ See 20 U.S.C. 1001-1002 for definition of “Institution of Higher Education.”

¹⁷ This section lists grounds for which the LMHA will deny assistance. Owners are also permitted to screen potential Tenants for suitability as described in Section 6.H of this Administrative Plan.

¹⁸ PIH 2015-19, *Guidelines for Public Housing Agencies (PHAs) and Owners of Federally-Assisted Housing on Excluding the Use of Arrest Records in Housing Decisions*

¹⁹ For additional information regarding mandatory Public Housing Agency screening of Applicants who are ex-offenders or current abusers of alcohol or illegal drugs, see: Donovan, Shaun and Sandra B. Henriquez, “Letter from the HUD Secretary and Assistant Secretary for Public and Indian Housing to Public Housing Agency Executive Directors,” 17 June 2011

- c. Is an individual found to have manufactured or produced methamphetamine on the premises of Federally Assisted Housing;
- d. Is a sex offender subject to a lifetime registration requirement under a state sex offender registration program;
- e. Is currently engaging in illegal use of a drug;
- f. Is an individual whose illegal drug use, alcohol use, or pattern of drug or alcohol abuse may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents; or
- g. Was evicted from Federally Assisted Housing within the past three years because of Drug-Related Criminal Activity. The three year limit is based on the date of such eviction, not the date the crime was committed. However, the LMHA may admit the Household if the Housing Authority determines that the evicted Household Member who engaged in Drug-Related Criminal Activity has successfully completed a supervised drug rehabilitation program, including those supervised by drug courts, or that the circumstances leading to eviction no longer exist.

Before any Applicant is denied assistance, they will be notified of the proposed action in writing and given the opportunity to request an informal review in accordance with Section 4.F of this Administrative Plan.

The fact that an Applicant is or has been a victim of Domestic Violence, Dating Violence, Sexual Assault, or Stalking is not an appropriate basis for denial of HCV Program assistance or for denial of admission, if the Applicant otherwise qualifies for assistance or admission.²⁰ Additional information regarding protections available to Applicants under the Violence Against Women Act can be found in Section 2.F of this Administrative Plan.

2. Use of the Dru Sjodin National Sex Offender Website to Determine Whether Assistance Should Be Denied

The LMHA will check the U.S. Department of Justice’s Dru Sjodin National Sex Offender website to ensure that no Adult Household Member is registered as a lifetime sex offender under any state sex offender registration program.²¹ The Dru Sjodin National Sex Offender Database is an online, searchable database, which combines the data from individual state sex offender registries for all 50 states, the District of Columbia, U.S. territories, and Indian Country. This database is open to the public and can be accessed at the following web address:

<http://www.nsopw.gov/>

If an Applicant is about to be denied housing based on information obtained through

²⁰ 24 CFR 982.552, “PHA Denial or Termination of Assistance for Family”

²¹ PIH 2012-28, *State Registered Lifetime Sex Offenders in Federally Assisted Housing*

the Dru Sjodin National Sex Offender website, both the Head of Household and the Household Member with the criminal record will be provided a copy of the web search results. The Family will be given an opportunity to dispute the accuracy of the information and to request an informal review in accordance with Section 4.F of this Administrative Plan.²²

²² 24 CFR 982.553, “Denial of Admission and Termination of Assistance for Criminals and Alcohol Abusers”

4. THE ADMISSIONS PROCESS

A. ADMISSIONS PROCESS OVERVIEW

Note: To make application to the Louisville Metro Housing Authority's (LMHA) Housing Choice Voucher (HCV) Program, an individual must be at least 18 years of age or an Emancipated Minor.

The application process involves two phases:

1. The Pre-Application

The first phase (known as the pre-application) requires the Applicant Family to complete and return to the LMHA an initial application for housing assistance. This brief form asks the Family to provide limited basic information including name, address, phone number, Family composition and Family unit size, racial and/or ethnic designation of the head of household, and information establishing any preferences to which the Family may be entitled. This first phase results in the Family's placement on the waiting list.

2. The Full Application

The second phase (known as the full application) begins when the Applicant Family nears the top of the waiting list, and includes the following steps:

- a. The Applicant Family attends a New Family Orientation;
- b. LMHA staff verifies the Family is eligible for any admissions preference they claimed on their pre-application;
- c. The Family is scheduled for an eligibility appointment;
- d. LMHA staff determines whether or not the Family is eligible for admission to the Housing Authority's HCV Program;
- e. The Family attends an HCV Program briefing (see Section 6);
- f. The Family is issued a Housing Choice Voucher, and begins their search for a dwelling unit to lease (see Section 6);
- f. The Family submits a Request for Tenancy Approval to the LMHA, and the LMHA conducts an inspection to ensure that the dwelling unit is decent, safe, and sanitary (see Section 6);
- g. The Family signs a lease and begins to receive assistance (see Section 6).

B. THE PRE-APPLICATION

1. Completing the Pre-Application

Families wishing to apply for the HCV Program will be required to complete a pre-application for housing assistance. Pre-applications may be obtained at 801 Vine Street Louisville, KY 40204 or will be mailed to interested Families upon request. A copy of the pre-application can also be downloaded from the Housing Authority's website (www.lmha1.org).

Completed pre-applications must be returned to P. O. Box 189, Louisville, KY 40201-0189.

When the LMHA receives the Applicant Family's completed pre-application, the postmark date recorded on the envelope containing the pre-application is used to determine the order in which the Family's name is added to the HCV Program's waiting list. If the postmark date is a business day, that date is used. If the postmark date is not a business day, the date of the next business day is used. If multiple pre-applications are dated the same business day, a randomized, objective method will be used to decide the order in which these Families are added to the waiting list.

2. Assistance Available to Persons with Disabilities

Persons with disabilities who require a reasonable accommodation in order to complete a pre-application may contact the LMHA to make special arrangements for assistance.

Any Applicant with a hearing or speech impairment can receive assistance contacting the Housing Authority by dialing 7-1-1 to reach the Kentucky Telephone Relay Service, or may contact the LMHA directly by dialing 502-587-0831 to be connected using a Telecommunication Device for the Deaf (TDD).

If an Applicant is visually impaired, all notices can be made available in appropriate alternate formats.

3. Reporting Changes to Applicant Information

While on the waiting list, Applicant Families are required to report changes related to their address, Family composition, or their eligibility for any waiting list preference:

Changes may reported by writing:

Attention: Waiting List
Louisville Metro Housing Authority
P.O. Box 189
Louisville, Kentucky 40201-0189

The LMHA prefers that families use the Pre-Application Update Form, which is available at the 801 Vine Street Office or online at the Housing Authority's website (www.lmha1.org).

The LMHA will annotate the Family's file and will update their place on the waiting list if appropriate.

C. WAITING LIST MANAGEMENT

1. Opening and Closing the Waiting List¹

a. Opening the Waiting List

Opening of the waiting list will be announced via public notice that applications for the HCV Program will again be accepted. The public notice will state where, when, and how to apply. The notice will be published in a local newspaper of general circulation, and also by any available minority media. The public notice will state any limitations to who may apply.

The notice will state that Applicants already on waiting lists for other housing programs must apply separately for this program, and that such Applicants will not lose their place on other waiting lists when they apply for the HCV Program. The notice will include the Fair Housing logo and slogan and otherwise be in compliance with HUD Fair Housing requirements.

b. Closing the Waiting List

Closing of the waiting list will be announced via public notice. The public notice will state the date the waiting list will be closed. The public notice will be published in a local newspaper of general circulation, and also by any available minority media.

2. Waiting List Organization

a. Determining Waiting List Placement

Applicant Families will be added to the waiting list according to the postmark date associated with their completed pre-application. If the postmark date is a business day, that date is used. If the postmark date is not a business day, the date of the next business day is used. If multiple pre-applications are dated the same business day, a randomized, objective method will be used to decide the order in which these Families are added to the waiting list.

All Applicants who claim eligibility for at least one preference will be listed before Applicants who do not claim eligibility for any preference.

¹ 24 CFR 982.206, Waiting List: Opening and Closing; Public Notice

b. *Preferences*²

Consistent with the Housing Authority's Moving to Work (MTW) Annual Plan; the Consolidated Plan that covers the LMHA jurisdiction; and local housing needs and priorities, the Housing Authority will give an admissions preference to Applicant Families that meet at least one of the following criteria:

- i. Applicant Families that successfully completed the Housing Authority's HCV Homeownership Program by becoming economically independent, and who still own and reside in the formerly assisted unit, but who now, through extenuating services, need HCV assistance again.
- ii. Applicant Families that have applied to (and met the admissions criteria for) one of the Housing Authority's Special Referral Programs. Information on applying to these Programs can be found in Appendix 7.
- iii. Public Housing Program Participant Families graduating from the Housing Authority's Special Referral Program with Family Scholar House in good standing. Applicant Family eligibility for this preference must be verified by Family Scholar House.

- iv. Applicant Families referred by the Family Health Centers Common Assessment Team that include an Adult Household Member who is a Homeless veteran. For the purpose of determining eligibility for this preference, the term "veteran" includes anyone who wore the uniform of any of the military forces. It does not include National Guard members who were never called up for service.³ Families that believe they may qualify for this admissions preference should contact:

Family Health Centers Common Assessment Team

1300 S. 4th St., Suite 200

Louisville, KY 40208

Phone: (502) 773-3811

Website: <http://www.fhclouisville.org/health-services/healthcare-for-the-homeless>

- v. Applicant Families referred by the Family Health Centers Common Assessment Team that are currently assisted through a homeless services voucher. LMHA will not serve more than 200 Families admitted through this preference at any given time.⁴ Families that believe they may qualify for this admissions preference should contact:

² 24 CFR 982.202, How Applicants Are Selected: General Requirements and 24 CFR 982.207, Waiting List: Local Preferences in Admission to Program

³ *RX: Housing Veterans*. Report to Mayor Fischer on Ending Veteran Homelessness in Louisville, Kentucky. 5 December 2014.

⁴ Notice PIH 2013-15, *Guidance on Housing Individuals and Families Experiencing Homelessness through the Public Housing and Housing Choice Voucher Program*

Family Health Centers Common Assessment Team
1300 S. 4th St., Suite 200
Louisville, KY 40208
Phone: (502) 773-3811
Website: <http://www.fhclouisville.org/health-services/healthcare-for-the-homeless>

The LMHA will not deny a local preference, nor otherwise exclude or penalize an Applicant Family, solely because the Family resides in public housing.

c. Selection from the Waiting List

All admissions preferences will be treated equally. For the purpose of waiting list placement, an Applicant Family that is eligible for more than one preference will be treated the same as a Family with only one preference.

The date the pre-application was postmarked will be utilized to determine the sequence in which preference holders are added to the waiting list. If the postmark date is a business day, that date is used. If the postmark date is not a business day, the date of the next business day is used. If multiple pre-applications are dated the same business day, a randomized, objective method will be used to decide the order in which these Families are added to the waiting list.

Non-preference holders will be listed on the waiting list after preference holders. If the postmark date is a business day, that date is used. If the postmark date is not a business day, the date of the next business day is used. If multiple pre-applications are dated the same business day, a randomized, objective method will be used to decide the order in which these Families are added to the waiting list.

Notwithstanding the above, if necessary to meet the statutory requirement that 75% of newly admitted Participant Families in any fiscal year be Extremely Low-Income Families, the LMHA retains the right to skip higher income Applicant Families on the waiting list to reach Extremely Low-Income Families. This measure will be taken only if it appears that the statutory goal will not otherwise be met. To ensure this goal is met, the Housing Authority will monitor the incomes of newly admitted Participant Families and the incomes of Applicant Families on the waiting list.⁵

If there are not enough Extremely Low-Income Applicant Families on the waiting list, the LMHA will conduct outreach on a non-discriminatory basis to attract these Families.

d. Removing an Applicant Family from the Waiting List⁶

The LMHA will not remove an Applicant Family from the waiting list unless:

⁵ 24 CFR 982.201, Eligibility and Targeting

⁶ 24 CFR 982.204, Waiting List: Administration of Waiting List

- i. The person listed as the head of household on the pre-application requests their Family be removed;
- ii. The Applicant Family fails to respond to a written request for information or to a request to declare their continued interest in the HCV Program;
- iii. The Applicant Family misses scheduled appointments (see subsection D(2)); or
- iv. The Applicant Family does not meet either the eligibility or screening criteria for the HCV Program.
- v. The Applicant has been issued a Housing Choice Voucher.

The reason the Family is removed from the waiting list will be documented in the Family's file. Once closed, the file will be retained for three years.

*e. Purging the Waiting List*⁷

The LMHA will purge its waiting list when the Housing Authority determines such action is necessary to ensure that the pool of Applicant Families reasonably represents interested Families. Waiting list purges also enable the LMHA to update information regarding Applicant Family address, Family composition, and preferences.

The purge will consist of the LMHA mailing via first class mail a form to be completed by the Applicant Family and returned to the Housing Authority within a specified number of calendar days. If the envelope is returned as undeliverable or if no response is received from the Family within the specified time frame, the Applicant Family will be removed from the waiting list. If the envelope is returned with a forwarding address on it, the LMHA will mail the form to the new address, with a new deadline for response.

Applicant Families will be advised when they sign up for the waiting list that they need to promptly update the LMHA on all changes to address, Family composition, and eligibility for waiting list preferences.

D. THE FULL APPLICATION

1. The Full Application Process

When an Applicant Family nears the top of the waiting list, they will be invited to attend a New Family Orientation.

⁷ 24 CFR 982.204, Waiting List: Administration of Waiting List and *HCV Program Guidebook*, 4-7

Following the Orientation, LMHA staff will verify the Family's eligibility for any waiting list preference they have claimed. If the LMHA determines that the Family is not eligible for a waiting list preference, they will be placed back on the waiting list behind all Families claiming eligibility for any preference and according to the date the Family's pre-application was postmarked. If the postmark date is a business day, that date is used. If the postmark date is not a business day, the date of the next business day is used.

The LMHA will notify the Family in writing of this determination and give them the opportunity to request an informal review (see subsection F).

Once the Applicant Family has attended the New Family Orientation (and had their waiting list preference verified, if applicable), the Family will be scheduled for an eligibility appointment.

2. Missed Appointments

During the full application process, any Applicant Family that fails to keep a scheduled appointment, and does not contact the LMHA before the originally scheduled appointment time to re-schedule, will be sent a notice of denial. The full application process extends from the time the Family is invited to attend a New Family Orientation until the time they sign a lease.

The Applicant Family will be offered the right to an informal review before being removed from the waiting list (see subsection F for additional information on the informal review process).

Scheduled appointments include, but are not limited to, New Family Orientations, eligibility appointments, and briefings.

E. NON-WAITING LIST ADMISSIONS

1. Special Admissions When Assistance Is Targeted by HUD⁸

Occasionally, the LMHA receives HCV (Section 8) funding from HUD that is targeted for Families living in specified units. In these cases, the LMHA must use the assistance for Families living in these units. If necessary to meet the HUD requirements associated with this funding, the LMHA may admit Applicant Families that are not on the Housing Authority's waiting list or admit Applicant Families without considering their waiting list position.

The following are examples of types of program funding that may be targeted for a Family living in a specified unit:

⁸ 24 CFR 982.203, "Special Admissions (Non-Waiting List): Assistance Targeted by HUD"

- a. A Family displaced because of demolition or disposition of a public housing project;
- b. A Family residing in a multifamily rental housing project when HUD sells, forecloses or demolishes the project;
- c. For housing covered by the Low Income Housing Preservation and Resident Homeownership Act of 1990 (41 U.S.C. 4101 *et seq.*):
 - i. A non-purchasing Family residing in a project subject to a homeownership program (under 24 CFR 248.173); or
 - ii. A Family displaced because of mortgage prepayment or voluntary termination of a mortgage insurance contract (as provided in 24 CFR 248.165);
- d. A Family residing in a project covered by a project-based Section 8 HAP contract at or near the end of the HAP contract term; and
- e. A non-purchasing Family residing in a HOPE 1 or HOPE 2 project.

2. Special Purpose Vouchers

Occasionally, the LMHA receives an allocation of HCV vouchers from HUD that is targeted to assist Families that meet specified eligibility criteria. Applicants for these vouchers are not selected through the Housing Authority's waiting list, but through a separate selection process determined by HUD.

The LMHA currently has HCV vouchers designated to assist homeless veterans. For information on how to apply for these vouchers, see Appendix 6.

Once the Family has begun participation in the VASH Program, a Department of Veterans Affairs Medical Center determination that the Family no longer requires case management is not grounds for termination of assistance. In such cases, the LMHA will offer the Family continued assistance through one of its tenant-based HCV vouchers, in order to free up a VASH voucher for another eligible Family referred by the Department of Veterans Affairs Medical Center. If the Housing Authority has no tenant-based HCV voucher to offer the Family, the Family will retain their VASH voucher until such time as the LMHA has an available tenant-based HCV voucher to offer the Family.⁹

3. The Single Room Occupancy (SRO) Program

Through HUD's Single Room Occupancy (SRO) Program, the LMHA provides Section 8 rental assistance for homeless individuals. Individuals assisted under the SRO

⁹ 77 FR 17086, *Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-VA Supportive Housing Program*

Program are not selected through the Housing Authority's HCV Program waiting list. Instead, they must apply directly to the designated housing development receiving assistance. For information on how to apply for assistance through the SRO Program, see Appendix 9.

Moving out of an SRO-assisted unit is not grounds for termination of assistance. LMHA will offer lease-compliant Families continued assistance through the use of a tenant-based HCV voucher, should the LMHA have a voucher available at the time of the Family's move.

F. INFORMAL REVIEW¹⁰

1. Notification of Removal from Waiting List or Denial of Assistance

Any Applicant Family that is being removed from the waiting list or that is being denied assistance because they do not meet the admissions criteria for the Housing Authority's HCV Program will be notified by the LMHA, in writing, that they have 10 calendar days from the date of the written correspondence, to request an informal review in writing or to present documentation demonstrating that the Housing Authority's reason for removing them from the waiting list or for denying them assistance is invalid.

The notification letter will contain a brief statement of the reason(s) for the decision, describe how the Applicant may obtain an informal review, and also indicate that the Applicant Family will be removed from the waiting list if they fail to respond within the timeframe specified.

If the LMHA denies admission to the Housing Authority's HCV Program on the basis of a criminal record, the LMHA will provide the person with the criminal record (i.e., the Family member) and the Applicant head of household with a copy of the criminal record.

The LMHA's system of removing Applicant Families from the waiting list will not violate the rights of persons with disabilities. If an Applicant's failure to respond to a request for information or updates was caused by the Applicant's disability (as verified by the LMHA), the Housing Authority will provide a reasonable accommodation. For additional information on the reasonable accommodation process, see Section 2(B).

2. Informal Review Process

- a. The review will be conducted by any person or persons designated by the LMHA other than the person who made or approved the decision under review or a subordinate of this person.

¹⁰ 24 CFR 982.554, Informal Review for Applicant

LOUISVILLE METRO HOUSING AUTHORITY



HOUSING CHOICE VOUCHER PROGRAM ADMINISTRATIVE PLAN

January 2018



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1. INTRODUCTION

A. THE TENANT-BASED HOUSING CHOICE VOUCHER PROGRAM¹

The tenant-based Housing Choice Voucher (HCV) Program is operated by the Department of Housing and Urban Development (HUD). Through the HCV Program, eligible Low-Income Families receive rental subsidies, so they can afford decent, safe, and sanitary housing.

Once an Applicant Family's eligibility for the Program has been determined, the Family selects a dwelling unit that meets Program requirements, and signs a rental Lease with the unit's Owner. Typically, the Family then pays 30% of their Monthly Adjusted Income towards their rent, while an additional rent subsidy payment is made directly to the Owner on behalf of the Family.

The HCV Program is most often administrated by state or local government entities called Public Housing Agencies using housing assistance funds provided by HUD. The Louisville Metro Housing Authority (LMHA) is the Public Housing Agency that administers the HCV Program in Louisville, Kentucky.

This Administrative Plan describes the policies the LMHA uses to administer its HCV Program.

B. COMPLIANCE WITH LAWS AND REGULATIONS

The operation of the Housing Authority's HCV Program will comply with the following:

1. All federal, state, and local laws;
2. The Housing Authority's consolidated Annual Contributions Contract with HUD;
3. The requirements of any grant agreement signed by the LMHA as a condition of receiving specific vouchers; and
4. HUD regulations.

If there is any conflict between this policy and laws or regulations, the laws and regulations will prevail.

¹ 24 CFR 982.1, Programs: Purpose and Structure

C. HCV PROGRAM FLEXIBILITIES PROVIDED THROUGH MOVING TO WORK (MTW)

This HCV Administrative Plan is aligned with the Moving to Work (MTW) Agreement by and between HUD and the LMHA, as amended and restated on April 15, 2008, and including any subsequent amendments thereto. The MTW Agreement governs and supersedes, as appropriate, applicable federal laws, rules, regulations, contracts, and agreements that have been or will be waived and/or modified by the MTW Agreement and subsequent amendments to the Agreement.

This Administrative Plan, in conjunction with the approved MTW Annual Plan, together comprise the operational policies of the Housing Authority's HCV Program.

With HUD approval, the LMHA has implemented a number of specific activities made possible by the regulatory flexibilities provided through the MTW Program. The activities that impact the HCV Program are as follows:

Table 1-1: Moving to Work (MTW) Activities

Activity #	Activity Description
1-2005	Special Referral Program: Center for Women & Families
2-2005	MTW inspections protocol
3-2006	HCV Homeownership Program: Distribution of HCV Homeownership Assistance
4-2007	Alternate year Re-Examinations of Disabled Families and Participant Families where Head, Co-Head, or spouse is at least 55 years of age
6-2008	Earned income disregard for Elderly Families
7-2008	Special Referral Program: Day Spring
8-2008	Standard medical deduction for Elderly and Disabled Families
11-2009	HCV Homeownership Program: Flexibility in third-party verifications
13-2009	HCV Homeownership Program: Exception payment standards
15-2009	Special Referral Program: Louisville Scholar House
17-2009	Multicultural Family Assistance Program
20-2010	Special Referral Program: Downtown Family Scholar House
27-2011	Deduction of Child Care Expenses for purpose of determining eligibility
29-2012	Special Referral Program: 100,000 Homes Initiative
30-2012	Special Referral Program: Stoddard Johnston Scholar House
31-2012	Elimination of earned income disregard for Non-Elderly Families
33-2012	Special Referral Program: Wellspring (Youngland Avenue facility)
34-2012	Special Referral Programs: Phoenix Hill Shelter + Care Initiative
35-2012	Special Referral Programs: Coalition for the Homeless, Wellspring (Bashford Manor and Ardery facilities), Choices Inc, Kentucky Cabinet for Health & Family Services/KHC
36-2013	Special Referral Program: Parkland Scholar House
39-2014	Contract rent increase limit
40-2014	Financial aid disregard in calculation of Total Tenant Payment
42-2015	Special Referral Program: Seven Counties Services, Inc.
43-2015	HUD/MDRC rent reform demonstration for HCV Households
44-2015	Combined reporting of MTW Special Referral Programs
45-2016	MTW Special Referral Program: Coalition for the Homeless “Move Up” Program (Pending HUD Approval)
46-2017	MTW Special Referral Program – Riverport Scholar House
47-2017	MTW Special Referral Program – ChooseWell Communities
48-2018	Local Project-Based Voucher Program
49-2018	Beecher Terrace CNI Revitalization – Broader Use of Funds to Support Development of Off-Site, Mixed-Income Replacement Housing

D. SUMMARY OF HOUSING AUTHORITY, OWNER, AND FAMILY RESPONSIBILITIES

1. Housing Authority Responsibilities

In administering the HCV Program, the LMHA will:

- a. Publish and disseminate information about the availability and nature of housing assistance under the Program;

- b. Explain the Program to Owners, Applicant Families, and Participant Families, including each party's rights and responsibilities under the Violence Against Women Act;
- c. Seek expanded opportunities for assisted Families to locate housing outside areas of poverty or racial concentration;
- d. Encourage Owners to make units available for leasing in the Program, including Owners of suitable units located outside areas of poverty or racial concentration;
- e. Affirmatively further fair housing goals and comply with equal opportunity requirements;
- f. Make efforts to help people with disabilities find satisfactory housing;
- g. Receive applications from Applicant Families, maintain the waiting list, determine eligibility, issue a Housing Choice Voucher to each selected Applicant Family, and provide housing information to Applicant Families selected;
- h. Determine who can live in the assisted unit at admissions and during the Participant Family's participation in the Program;
- i. Obtain and verify evidence of citizenship and eligible immigration status;
- j. Review the Applicant or Participant Family's request for approval of the tenancy and the Owner Lease, which must include the HUD prescribed tenancy addendum;
- k. Inspect the unit before the assisted occupancy begins and at least as often as required by HUD during the assisted tenancy;
- l. Determine the amount of the Housing Assistance Payment for the Participant Family;
- m. Determine the maximum Rent to Owner and whether the rent is reasonable;
- n. Make timely Housing Assistance Payments to the Owner in accordance with the Housing Assistance Payments contract;
- o. Examine Applicant Family income, size, and composition at admission and Participant Family income, size, and composition at least once every two years during the Family's participation in the Program. This examination will include verification of income and other Family information;
- p. Establish and periodically adjust the schedule of Utility Allowances;
- q. Administer and enforce the Housing Assistance Payments contract with the Owner, including taking appropriate action if the Owner defaults on the contract;
- r. Determine whether to terminate assistance to a Participant Family for the violation of family obligations;

- s. Conduct informal reviews of certain LMHA decisions concerning applications for participation in the Program;
- t. Conduct informal hearings on certain LMHA decisions concerning Participant Families;
- u. Provide sound financial management of the Program, including engaging an independent public accountant to conduct audits;
- v. Administer HUD-funded special HCV Programs (as applicable); and
- w. Administer a Family Self-Sufficiency (FSS) Program.

2. Owner Responsibilities²

The Owner is responsible for performing all of the Owner's obligations under the Housing Assistance Payments contract and the Lease, including the tenancy addendum. These obligations include, but are not limited to the following:

- a. Performing all management and rental functions for the assisted unit, including selecting a Voucher Holder to lease the unit, and deciding if the Family is suitable for tenancy of the unit. The fact that a Family Member is or has been a victim of Domestic Violence, Dating Violence, or Stalking is not an appropriate basis for denial of tenancy if the Family otherwise qualifies for tenancy;
- b. Maintaining the unit in accordance with the Housing Authority's standards for decent, safe, and sanitary housing, including performance of ordinary and extraordinary maintenance;
- c. Providing access to the unit for scheduled inspections;
- d. Complying with fair housing and equal opportunity requirements;
- e. Preparing and furnishing to the LMHA information required under the Housing Assistance Payments contract, including but not limited to, promptly giving the LMHA a copy of any Owner eviction notice;
- f. Collecting from the Applicant or Participant Family:
 - i. Any security deposit;
 - ii. The tenant contribution (the part of Rent to Owner not covered by the Housing Assistance Payment); and
 - iii. Any charges for unit damage by the Participant Family;
- g. Enforcing tenant obligations under the Lease;

² 24 CFR 982.452, Owner Responsibilities

- h. Paying for utilities and services (unless paid by the Participant Family under the Lease);
- i. For modifications to a dwelling unit occupied or to be occupied by a person with a disability (as described at 24 CFR 100.203); and
- j. For registering the assisted unit in the Louisville Metro Rental Registry.³

3. Participant Family Responsibilities⁴

Participant Family obligations include, but are not limited to, the following:

- a. Supplying required information:
 - i. The Participant Family must supply any information that the LMHA or HUD determines is necessary in the administration of the HCV Program, including submission of required evidence of citizenship or eligible immigration status. Information includes any requested certification, release, or other documentation;
 - ii. The Participant Family must supply any information requested by the LMHA or HUD for use in a regularly scheduled Re-Examination or Interim Re-Examination of Family income and composition in accordance with HUD requirements;
 - iii. The Participant Family must disclose and verify Social Security Numbers and must sign and submit consent forms for obtaining information; and
 - iv. All information supplied by the Participant Family must be true and complete;
- b. Not causing, or allowing Guests to cause, any breach of the Housing Authority's standards for decent, safe, and sanitary units, as determined by the LMHA;
- c. Allowing the LMHA to inspect the unit at reasonable times and after at least two days Written Notification, as required by state law;
- d. Not committing any serious or repeated violation of the Lease. An incident or incidents of actual or threatened Domestic Violence, Dating Violence, or Stalking will not be construed as a serious or repeated Lease violation by the victim (or threatened victim) of Domestic Violence, Dating Violence, or Stalking, or as good cause to terminate the tenancy, occupancy rights, or assistance of the victim;
- e. Notifying the LMHA and the Owner (and receiving the Housing Authority's approval if the Participant Family wishes to receive continued assistance) before

³ Additional information regarding rental property registration can be found at: <https://louisvilleky.gov/government/codes-regulations/rental-registry>

⁴ 24 982.551, Obligations of Participant

the Participant Family moves out of the unit or terminates the Lease on notice to the Owner;

- f. Promptly giving the LMHA a copy of any Owner eviction notice;
- g. Regarding the use and occupancy of the unit:
 - i. The Participant Family must use the assisted unit for residence by the Family. The unit must be the Family's only residence;
 - ii. The LMHA must approve the composition of the Participant Family residing in the unit. The Family must inform the LMHA within 10 calendar days of the birth, adoption, or court-awarded custody of a child. The Family must request LMHA approval to add any other Family Member as an occupant of the unit. No other person (i.e., no one but Members of the assisted Family) may reside in the unit except for a Foster Child, Foster Adult, or Live-In Aide as provided in paragraph (iv) of this section;
 - iii. The Participant Family must promptly notify the LMHA within 10 calendar days if any Family Member no longer resides in the unit;
 - iv. If the LMHA has given approval, a Foster Child, Foster Adult, or Live-In Aide may reside in the unit. The Housing Authority has the discretion to adopt reasonable policies concerning residence by a Foster Child, Foster Adult, or Live-In Aide and to define when LMHA consent may be given or denied;
 - v. Household Members may engage in legal profitmaking activities in the unit, but only if such activities are incidental to primary use of the unit for residence by Participant Family Members. Any business uses of the unit must comply with the Lease, zoning requirements, and the affected Household Member must obtain all appropriate licenses;
 - vi. The Participant Family must not sublease or let the unit; and
 - vii. The Participant Family must not assign the Lease or transfer the unit;
- h. Regarding any absence of all Participant Family Members from the unit:⁵
 - i. The Participant Family must supply any information or certification requested by the LMHA to verify that the Family is living in the unit, or relating to Family absence from the unit, including any Housing Authority requested information or certification on the purposes of Family absences. The Family must cooperate with the LMHA for this purpose;
 - ii. Utilities must be maintained and rent paid during any absence of the Participant Family from the unit;

⁵ 24 CFR 982.312, Absence from Unit

- iii. The Participant Family must promptly notify the LMHA of its absence from the unit if the entire Family will be absent from the unit for more than 30 calendar days. The Family must request permission from the Housing Authority for absences exceeding 120 calendar days; and
- iv. Authorizations for absences of more than 120 calendar days will only be granted in limited circumstances, when such absences are deemed necessary by the LMHA. Such absences include, but are not limited to, prolonged hospitalization, death in the Family, and other Family Member illnesses;
- i. Not owning or having any interest in the unit (except for Owners of a Manufactured Home renting the Manufactured Home Space or Participant Families using a Housing Choice Voucher to purchase a home);
- j. Not committing fraud, bribery, or any other corrupt or criminal act in connection with the HCV Program;
- k. Not engaging in Drug-Related Criminal Activity or Violent Criminal Activity or other criminal activity that threatens the health, safety, or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the Premises. Criminal activity directly related to Domestic Violence, Dating Violence, or Stalking, engaged in by a Household Member or Guest or any Other Person Under the Tenant's Control, shall not be cause for termination of tenancy, occupancy rights, or assistance of the victim, if the Tenant or Immediate Family Member of the Tenant is the victim;
- l. Not abusing alcohol in a way that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the Premises;
- m. Not receiving HCV tenant-based assistance while receiving another housing subsidy, for the same unit or for a different unit, under any duplicative (as determined by HUD or in accordance with HUD requirements) federal, state or local housing assistance program.

2. PROVIDING EQUAL ACCESS

A. FAIR HOUSING¹

It is the policy of the Louisville Metro Housing Authority (LMHA) to comply fully with all federal, state, and local nondiscrimination laws; the Americans with Disabilities Act; and the U.S. Department of Housing and Urban Development (HUD) regulations governing fair housing and equal opportunity.

No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, disability, marital status, or perceived or actual Sexual Orientation or Gender Identity, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the Housing Authority's housing programs.

No inquiries shall be made about a person's Sexual Orientation or Gender Identity. However, the LMHA may inquire about a person's sex in order to determine the number of bedrooms a Household may be eligible for under the Housing Authority's occupancy standards or to accurately complete Form HUD-50058 or Form HUD-50058 MTW.

To further its commitment to and full compliance with applicable civil rights laws, the LMHA will provide information to Applicant and Participant Families regarding fair housing laws and any recourse available to them if they believe they may be victims of illegal discrimination. Such information will be made available with the full application, and applicable fair housing information and discrimination complaint forms will be made available at the Housing Authority's offices. In addition, appropriate written information and advertisements will contain suitable equal opportunity language and the HUD Office of Fair Housing and Equal Opportunity logo.²

The LMHA will assist any Family that believes they have suffered illegal discrimination by providing them with a copy of Form HUD-903.1, *Are You a Victim of Housing Discrimination?*, in their preferred language when available. A copy of this form is available in Appendix 3.A of this Plan. Form HUD-903.1 can also be completed and submitted online at the following web address:

http://portal.hud.gov/hudportal/HUD?src=/topics/housing_discrimination

Versions of Form HUD-903.1 in Arabic, Cambodian, Chinese, English, Korean, Russian, Somali, Spanish, and Vietnamese can be downloaded from:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/forms/hud9

¹ 24 CFR 982.53, "Equal Opportunity Requirements and Protection for Victims of Domestic Violence, Dating Violence, or Stalking"; 24 CFR 982.304, "Illegal Discrimination: PHA Assistance to Family"; PIH 2014-20, *Program Eligibility Regardless of Sexual Orientation, Gender Identity or Marital Status as Required by HUD's Equal Access Rule*

² The FHEO logo can be downloaded from:

<http://portal.hud.gov/hudportal/HUD?src=/library/bookshelf/1/hudgraphics/fheologo>

If requested, the Housing Authority will assist Families as appropriate to ensure equal access, and will provide the address of the nearest HUD Office of Fair Housing and Equal Opportunity. The address of the office nearest to the Housing Authority's jurisdiction is as follows:

Atlanta Regional Office of FHEO
U.S. Department of Housing and Urban Development
Five Points Plaza
40 Marietta Street, 16th Floor
Atlanta, Georgia 30303-2806

Phone: (404) 331-5140
Toll-Free: (800) 440-8091
TTY (Text Telephone): (404) 730-2654
Fax: (404) 331-1021
Email: complaints_office_04@hud.gov

Families that believe they have suffered illegal discrimination may also file a complaint locally with the Louisville Metro Human Relations Commission:³

Louisville Metro Human Relations Commission
410 West Chestnut Street
Suite 300A
Louisville, KY 40202

Phone: (502) 574-3631
TTY (Text Telephone): (502) 574-4332

A copy of the discrimination complaint form used by this agency is available at the following web address:

http://louisvilleky.gov/sites/default/files/human_relations/lmhrc_complaint_management_system_form.pdf

The LMHA will keep records of all fair housing complaints, investigations, notices, and corrective actions for five years.

B. REASONABLE ACCOMMODATION⁴

1. Overview

Sometimes a person with a disability may need a Reasonable Accommodation (Accommodation) in order to take full advantage of the Housing Authority's Housing

³ Louisville / Jefferson County Metro Government Code of Ordinances, 92.03, "Unlawful Practices in Connection with Housing"

⁴ Joint Statement of HUD and the Department of Justice, *Reasonable Modifications Under the Fair Housing Act*, 5 March 2008.

Choice Voucher (HCV) Program and related services. When such an Accommodation is granted it does not confer special treatment or advantage for the person with a disability; rather, such Accommodation makes the Program fully accessible to them in a way that would otherwise not be possible due to their disability.

Because disabilities are not always readily apparent, the LMHA will ensure that all Applicant and Participant Families are aware of the opportunity to request a Reasonable Accommodation. Any LMHA Written Notification that requires an Applicant or Participant Family to take an action will include information about requesting a Reasonable Accommodation. Such Notifications include, but are not limited to, notices of Re-Examination, inspection, appointment, and termination of assistance.

The LMHA prefers (but does not require) that Families use the Housing Authority's Request for Reasonable Accommodation form when requesting an Accommodation. Forms are given to all Applicant Families at the time they begin the full application process. In addition, forms are available at the Housing Authority's 801 Vine Street Office, Central Office, or any of its public housing site management offices during normal operating hours. A copy of the request form can also be found in Appendix 3.B of this Plan.

All decisions granting or denying requests will be in writing. Any request for an Accommodation that would enable a Participant Family to materially violate Family obligations will not be approved.

2. Evaluating a Request for Reasonable Accommodation

The LMHA will consider the following questions when evaluating a request for Reasonable Accommodation:

a. Is the requestor or a Household Member a person with a disability?

When evaluating requests for Reasonable Accommodation, the LMHA uses a different definition of the term "person with a disability" than the one found in the Glossary of this Plan. For this purpose only, the definition provided in the Fair Housing Act is used:⁵

"The Act defines a person with a disability to include

- (1) individuals with a physical or mental impairment that substantially limits one or more major life activities;
- (2) individuals who are regarded as having such an impairment; or
- (3) individuals with a record of such an impairment.

The term 'physical or mental impairment' includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, Human Immunodeficiency Virus (HIV) infection, mental

⁵ 42 U.S.C. § 12102, "Definition of Disability"

retardation, emotional illness, drug addiction (other than addiction caused by current, illegal use of a controlled substance) and alcoholism.

The term ‘substantially limits’ suggests that the limitation is ‘significant’ or ‘to a large degree.’

The term ‘major life activity’ means those activities that are of central importance to daily life, such as seeing, hearing, walking, breathing, performing manual tasks, caring for one’s self, learning, and speaking. This list of major life activities is not exhaustive.”⁶

If the disability is apparent or already documented, the answer to the question, “Is the requestor or a Household Member a person with a disability?” is yes. If the disability is not apparent or documented, the LMHA will obtain verification that the person requesting the Accommodation is a person with a disability.

Depending on the person’s circumstances, information verifying that the person meets the definition of disability can usually be provided by the individual (e.g., proof that an individual under 65 years of age receives Supplemental Security Income or Social Security Disability Insurance benefits or a credible statement by the individual). A doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability may also provide verification of a disability.

b. Is the requested Accommodation related to the disability?

If it is apparent that the request is related to the apparent or documented disability, the answer to this question is yes. If it is not apparent, the LMHA will obtain documentation that the requested Accommodation is needed due to the disability. The Housing Authority will not inquire as to the nature of the disability.

Generally the individual knows best what they need; however, the LMHA retains the right to be shown how the requested Accommodation enables the individual to access or use the Housing Authority’s programs or services.

*c. Is the requested Accommodation reasonable?*⁷

In order to be determined reasonable, the Accommodation must meet two criteria:

i. The Accommodation must not constitute a fundamental alteration

The Housing Authority’s business is housing. If the request would alter the fundamental business that the LMHA conducts, that would not be reasonable. For instance, the Housing Authority would deny a request to have the LMHA do grocery shopping for the person with a disability.

⁶Ibid, pages 3-4.

⁷ 24 CFR 8.6, “Nondiscrimination Based on Handicap in Federally Assisted Programs and Activities of the Department of Housing and Urban Development: General Provisions: Communications”

- ii. The Accommodation must not create an undue financial hardship or administrative burden

Frequently the requested Reasonable Accommodation costs little or nothing. If the cost would be an undue burden, the LMHA may request a meeting with the individual to investigate and consider equally effective alternatives.

If more than one Accommodation is equally effective in providing access to the Housing Authority's programs and services, the LMHA retains the right to select the most efficient or economic choice.

3. Requests to Physically Modify the Dwelling Unit

If the Applicant or Participant Family requests, as a Reasonable Accommodation, that they be permitted to make physical modifications to their dwelling unit at their own expense, the request should be made to the property Owner. The LMHA does not have responsibility for the Owner's unit and does not have responsibility to make the unit accessible. The Housing Authority may, however, grant a higher Payment Standard for units where property Owners make physical modifications for a person with a disability so long as the Payment Standard does not exceed 110% of Fair Market Rent.

C. SERVICES FOR INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY

The LMHA shall do its best, within reason, to assist individuals with limited English proficiency. Following an assessment of the needs of such persons within its jurisdiction, the Housing Authority has prepared a Language Access Plan, which can be found in Appendix 4.

D. OUTREACH

1. Family Outreach⁸

The LMHA will publicize, when appropriate, the availability and nature of the HCV Program for Extremely Low-Income and Very Low-Income Families in a newspaper of general circulation, minority media, and by other suitable means.

The LMHA will communicate the status of Program availability to other service providers in the community and advise them of housing eligibility factors and guidelines so that they can make proper referral of their clients to the Program.

The objective of this effort is to develop a waiting list that is representative of our low-income community. A particular emphasis will be placed on attracting eligible individuals and families least likely to apply for the HCV Program.

⁸ *HCV Program Guidebook*, Chapter 4.3, "Conducting Outreach to Families"

2. Owner Outreach⁹

The LMHA employs a Landlord Relations Specialist, who conducts regular outreach to Owners within the Housing Authority's jurisdiction, including Owners of suitable units located outside of areas of low-income or minority concentration and Owners of accessible units.

Owner outreach materials are available online through the Housing Authority's website (www.lmha1.org). These materials explain how the HCV Program works; how the Program benefits Owners; and Owners' responsibilities under the Program.

E. PRIVACY PROTECTIONS¹⁰

All Adult Family Members are periodically required to sign the Housing Authority's HUD-approved local version of Form HUD-9886, *Authorization for Release of Information and Privacy Act Notice*. This notice states how Family information will be released and includes the *Federal Privacy Act Statement*.

No third-party request for Applicant or Participant Family or Household information will be released unless there is a signed release of information request from the Applicant or Participant or unless required by law.

F. PROTECTIONS AGAINST DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, AND STALKING¹¹

1. Protections Provided Under the Violence Against Women Act¹²

The LMHA will provide notice to HCV Applicant and Participant Families of the following protections available to them under the Violence Against Women and Department of Justice Reauthorization Act of 2005, as amended (see Appendix 3.C for a copy of this notice). Such notice will also describe the limitations of these protections, and will be provided together with Form HUD-50066, *Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking* (see Appendix 3.D). Notice will be provided at the time an Applicant or Participant is admitted to or denied residency in a dwelling unit and with any notification of eviction or termination of assistance.

⁹ *HCV Program Guidebook*, Chapter 2.4, "Outreach to Owners"

¹⁰ 24 CFR 5.212, "Compliance with the Privacy Act and Other Requirements"; 24 CFR 5.230, "Consent by Assistance Applicants and Participants"; 24 CFR 982.551, "Obligations of Participant"

¹¹ 24 CFR 982.53, "Equal Opportunity Requirements and Protection for Victims of Domestic Violence, Dating Violence, or Stalking"

¹² 24 CFR 5.2005, "VAWA Protections"; 24 CFR 5.2009, "Remedies Available to Victims of Domestic Violence, Dating Violence, or Stalking in HUD-Assisted Housing," as updated by 78 FR 47717, *The Violence Against Women Reauthorization Act of 2013: Overview of Applicability to HUD Programs*, 6 August 2013. See also: Henriquez, Sandra B, "Letter from the HUD Assistant Secretary for Public and Indian Housing to Public Housing Agency Executive Directors," 30 September 2013.

These protections are equally available to both men and women and are available regardless of perceived or actual Gender Identity or Sexual Orientation.

Notice will also be provided to Owners of their rights and obligations under the Act.

a. Protections Available to Applicant Families

Admission to the HCV Program shall not be denied on the basis that the Applicant is or has been a victim of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, if the Applicant otherwise qualifies for assistance or admission.

b. Protections Available to Participant Families

- i. An incident or incidents of actual or threatened Domestic Violence, Dating Violence, Sexual Assault, or Stalking will not be construed as a serious or repeated Lease violation by the victim or threatened victim of the Domestic Violence, Dating Violence, Sexual Assault, or Stalking, or as good cause to terminate the tenancy of, occupancy rights of, or assistance to the victim;
- ii. Criminal activity directly related to Domestic Violence, Dating Violence, Sexual Assault, or Stalking, engaged in by a Household Member or any Guest or Other Person Under the Tenant's Control, shall not be cause for termination of tenancy of, occupancy rights of, or assistance to the victim, if the Tenant or an Affiliated Individual of the Tenant is the victim;
- iii. The LMHA or Owner may Bifurcate a Lease, or remove a Household Member from a Lease without regard to whether the Household Member is a signatory to the Lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any Tenant or lawful occupant who engages in criminal activity directly relating to Domestic Violence, Dating Violence, Sexual Assault, or Stalking against an Affiliated Individual or other individual, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is a Tenant or lawful occupant;
- iv. The LMHA and Owner will honor court orders addressing rights of access to or control of the property, including civil protection orders issued to protect the victim and to address the distribution of property among Household Members in a case where a Family breaks up; and
- v. Any protections provided by law that give greater protection to the victim are not superseded by these provisions.¹³

c. Limitations of Available Protections

¹³ 24 CFR 5.2011, "Effect on Other Laws"

- i. Nothing in this Section 2.F limits the ability of the LMHA or Owner to evict a Tenant or terminate assistance for a Lease violation unrelated to Domestic Violence, Dating Violence, Sexual Assault, or Stalking, provided the LMHA or Owner does not subject such a Tenant to a more demanding standard than other Tenants in making the determination whether to evict, or to terminate assistance or occupancy rights; and
- ii. Nothing in this Section 2.F may be construed to limit the authority of the LMHA or an Owner to evict or terminate assistance to any Tenant or lawful occupant if the Housing Authority or Owner can demonstrate an Actual and Imminent Threat to other Tenants or to those employed at or providing service to the HCV Program assisted property. In this context, words, gestures, actions, or other indicators will be considered an Actual and Imminent Threat if they meet the standards provided in the Glossary definition of this term.

Any eviction or termination of assistance as a result of an Actual and Imminent Threat will be utilized by the LMHA or Owner only when there are no other actions that could be taken to reduce or eliminate the Threat, including, but not limited to, transferring the victim to a different unit, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat. Restrictions predicated on public safety cannot be based on stereotypes, but must be tailored to particularized concerns about individual Participants.

2. Documenting the Occurrence of Domestic Violence, Dating Violence, Sexual Assault, or Stalking¹⁴

a. Request for Documentation

The law allows, but does not require, the LMHA or an Owner to request documentation that an incident or incidents of actual or threatened Domestic Violence, Dating Violence, Sexual Assault, or Stalking claimed by a Tenant or other lawful occupant is bona fide and meets the requirements of the applicable definitions set forth in this policy. The Housing Authority shall require verification in all cases where an individual claims protection against an action involving such individual proposed to be taken by the LMHA. Owners may elect to require documentation, or not to require it, as permitted under applicable law. The request for documentation must be in writing.

If requested, documentation must be provided to the LMHA or to the Owner within 14 Business Days after the date that the individual received the request for documentation, although an Owner may elect to provide additional time at their discretion.

¹⁴ 24 CFR 5.2007, “Documenting the Occurrence of Domestic Violence, Dating Violence, or Stalking”

b. Forms of Documentation

Documentation of a claimed incident or incidents of actual or threatened Domestic Violence, Dating Violence, Sexual Assault, or Stalking may be accomplished in one of the following ways:

i. HUD-Approved Certification Form (Form HUD-50066)

Documentation may consist of a HUD-approved certification form (Form HUD-50066) indicating that the individual is a victim of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and that the incident or incidents in question are bona fide incidents of such actual or threatened abuse. Such certification must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim, and may be based solely on the personal signed attestation of the victim. A copy of Form HUD-50066 can be found in Appendix 3.D;

ii. Police or Court Record

Documentation may consist of a federal, state, tribal, territorial, or local police report or court record;

iii. Administrative Agency Record

Documentation may consist of a record of an administrative agency; or

iv. Other Documentation

Other documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical or mental health professional, from whom the victim has sought assistance in addressing Domestic Violence, Dating Violence, Sexual Assault, or Stalking, or the effects of abuse, in which the professional attests under penalty of perjury to the professional's belief that the incident or incidents in question are bona fide incidents of abuse, and the victim of Domestic Violence, Dating Violence, Sexual Assault, or Stalking has signed or attested to the documentation.

c. Confidentiality

Any documentation provided, including the fact that the individual is a victim of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, will be kept confidential by the LMHA or Owner. The LMHA or Owner will not:

- i. Enter the information contained in the documentation into any shared database;
- ii. Allow employees of the LMHA or Owner or those within their employ (e.g., contractors) to have access to such information unless explicitly authorized by the Housing Authority or Owner for reasons that specifically call for these employees or those within their employ to have access to this information;

iii. Disclose this information to any other entity or individual, except to the extent that disclosure is:

- (A) Requested or consented to by the individual submitting the documentation in writing;
- (B) Required for use in an eviction proceeding; or
- (C) Otherwise required by applicable law.

d. Failure to Provide Documentation

Failure to provide documentation in accordance with the LMHA or Owner's written request will result in loss of protection under the Violence Against Women Act and under this policy against any proposed adverse action. The submission of false information may be the basis for the termination of assistance or for eviction.

e. Managing Conflicting Documentation

In cases where the LMHA or Owner receives conflicting certification documents from two or more Household Members, each claiming to be a victim and naming one or more of the other petitioning Household Members as the perpetrator, the Housing Authority or Owner may determine which is the true victim by requiring third-party documentation as described in Section 2.F.2.b, subparagraphs ii, iii, or iv and in accordance with any HUD guidance as to how such determinations will be made.

G. HCV PROGRAM INFORMATION TO BE POSTED IN LMHA OFFICES

The LMHA will post, in each of its offices in a conspicuous place and at a height easily read by all persons, including persons with mobility disabilities, the following information:

1. The Housing Choice Voucher (HCV) Administrative Plan;¹⁵
2. Notice of the status of the waiting list (opened or closed);
3. Addresses of all LMHA offices, telephone numbers, TDD (Telecommunications Device for the Deaf) numbers, and hours of operation;
4. Income limits for admission;
5. Informal review and informal hearing procedures;
6. Fair Housing Poster;¹⁶
7. Equal Opportunity in Employment Poster; and

¹⁵ 24 CFR 982.54, "Administrative Plan"

¹⁶ 24 CFR 110.15, "Location of Posters"

8. The Housing Authority's SEMAP score and designation.¹⁷

¹⁷ Public Housing Agencies that participate in HUD's Moving to Work (MTW) Demonstration Program, including the LMHA, are exempt from the SEMAP process. Instead, these agencies maintain a "High Performer" status for the duration of their participation in the MTW Program.

3. ELIGIBILITY FOR AND DENIAL OF ASSISTANCE

A. ELIGIBILITY CRITERIA¹

In order to be eligible for admission to the Housing Choice Voucher (HCV) Program, the Applicant Family must meet all eligibility criteria described in this Section 3.A.

Applicant Families will also be screened against the Louisville Metro Housing Authority's (LMHA) grounds for denial, listed in Section 3.B of this Administrative Plan, and must pass any additional Owner screening standards (see Section 6.H).

1. Family Status Eligibility Criteria

All Families must have a Head of Household or Co-Heads of Household.

Regardless of actual or perceived Sexual Orientation, Gender Identity, or marital status, Family includes, but is not limited to, the following:

a. A Family with or without Children

Such a Family is defined as a group of people related by blood, marriage, adoption, or affinity that lives together in a stable Family relationship:

- i. Children temporarily absent from the home due to placement in foster care are considered Family Members; and
- ii. Unborn children are considered Family Members for purposes of determining bedroom size, but are not considered Family Members for determining income limit.

b. An Elderly Family

- i. A Family whose Head (including Co-Head), spouse, or sole Member is a person who is at least 62 years of age;
- ii. Two or more persons who are at least 62 years of age living together; or
- iii. One or more persons who are at least 62 years of age living with one or more Live-In Aides.

c. A Near-Elderly Family

- i. A Family whose Head (including Co-Head), spouse, or sole Member is a person who is at least 50 years of age but below the age of 62;

¹ 24 CFR 982.201, "Eligibility and Targeting"

- ii. Two or more persons who are at least 50 years of age but below the age of 62 living together; or
- iii. One or more persons who are at least 50 years of age but below the age of 62 living with one or more Live-In Aides.

d. A Disabled Family

- i. A Family whose Head (including Co-Head), spouse, or sole Member is a Person with a Disability;
- ii. Two or more Persons with Disabilities living together; or
 - (A) One or more Persons with Disabilities living with one or more Live-In Aides.
 - (B) For purposes of qualifying for low-income housing, does not include a person whose disability is based solely on any drug or alcohol dependence.

e. A Displaced Family

A Family in which each Member, or whose sole Member, has been displaced by governmental action, or whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to federal disaster relief laws.

f. A Remaining Member of a Tenant Family

A Family Member of an assisted Family who remains in the unit when other Family Members have left the unit. The person must have been previously approved by the LMHA to be living in the unit.

If the only remaining Family Members are minor children, in order for the Family to continue to receive assistance:²

- i. The minor must be an Emancipated Minor who is legally able to execute a contract or Lease in the Commonwealth of Kentucky; or
- ii. The LMHA must receive verification from Child Protective Services and/or the Family Court indicating that another Adult is to move into the assisted unit to care for the minor child(ren). The Adult caretaker will be treated as a visitor until a legal determination of custody or guardianship has been made (up to a maximum of 180 calendar days), at which time the Adult, provided they are determined to be eligible for admission to the Housing Authority's HCV Program, will be designated Head of Household.

Should the Family Court determine that it is in the minor child(ren)'s best interest to be temporarily absent from the unit while legal custody or guardianship is

² PIH 2010-9, *Effective Use of the Enterprise Income Verification (EIV) System's Deceased Tenants Report to Reduce Subsidy Payment & Administrative Errors*

being determined, the LMHA will continue to make Housing Assistance Payments on the Family's behalf for up to 180 calendar days. By the end of this period, a legal guardian (who is eligible for admission to the Housing Authority's HCV Program) must have been appointed and be living in the unit with the minor child(ren), or assistance will be terminated.

g. A Single Person

A person who is not an Elderly or Displaced Person, or a Person with Disabilities, or the Remaining Member of a Tenant Family.

2. Income Eligibility Criteria

- a. To be income-eligible, the Applicant must be a Family in any of the following categories:
 - i. A Very Low-Income Family;
 - ii. A Low-Income Family that is Continuously Assisted under the 1937 Housing Act;
 - iii. A Low-Income Family that qualifies for voucher assistance as a non-purchasing Family residing in a:
 - (A) HOPE 1 (HOPE for public housing homeownership) project;
 - (B) HOPE 2 (HOPE for homeownership of multifamily units) project; or
 - (C) A project subject to a resident homeownership program under 24 CFR 248.173; or
 - iv. A Low-Income or Moderate-Income Family that is displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing.³
- b. The applicable income limit for issuance of a Housing Choice Voucher when a Family is selected for the HCV Program is the highest income limit (for the Family size) for areas in the LMHA jurisdiction. The applicable income limit for admission to the Program is the income limit for the area where the Family is initially assisted in the Program. At admission, the Family may only use the Voucher to rent a unit in an area where the Family is income eligible. This means that:
 - i. Families who are moving into the Housing Authority's jurisdiction under Portability and have the status of Applicant rather than of Participant at their Initial Housing Authority must meet the income limit for the area where they are initially assisted under the HCV Program; and
 - ii. Families who are moving into the Housing Authority's jurisdiction under

³ The term "eligible low-income housing" is defined at 24 CFR 248.101, "Prepayments and Plans of Action Under the Low Income Housing Preservation and Resident Homeownership Act of 1990: Definitions"

Portability and are already Program Participants at their Initial Housing Authority do not have to meet the income eligibility requirement for the LMHA Program.⁴

- c. Income limits apply only at admission and are not applicable for continued occupancy; however, as income rises the assistance will decrease.
- d. Income limit restrictions do not apply to Families transferring units within the Housing Authority's HCV Program.

3. Citizenship / Eligible Immigrant Status Eligibility Criteria⁵

a. Family Eligibility for Assistance

- i. To be eligible for HCV assistance every Family Member must be a Citizen, National, or a Noncitizen who has eligible immigration status under one of the categories set forth in Section 214 of the Housing and Community Development Act of 1980.⁶
- ii. Despite the ineligibility of one or more Family Members, a Mixed Family may be eligible for one of three types of preservation assistance.⁷
 - (A) Continued assistance;⁸
 - (B) Temporary deferral of termination of assistance;⁹ or
 - (C) Prorated assistance (A Mixed Family must be provided prorated assistance if the Family so requests).¹⁰
- iii. A Family without any eligible Family Members and receiving assistance on June 19, 1995, may be eligible for temporary deferral of termination of assistance.

b. Preferences

Citizens of the Republic of Marshall Islands, the Federated States of Micronesia, and the Republic of Palau, who have eligible immigration status under one of the categories set forth in Section 214 of the Housing and Community Development Act of 1980, are entitled to receive local preferences for housing assistance, except that, within Guam, such Citizens who have such local preference will not

⁴ 24 CFR 982.353, "Where Family Can Lease a Unit with Tenant-Based Assistance"

⁵ 24 CFR 5.506, "Restrictions on Assistance to Noncitizens: General Provisions"

⁶ See 42 U.S.C. 1436a(a), "Restriction on Use of Assisted Housing by Non-Resident Aliens"

⁷ 24 CFR 5.516, "Availability of Preservation Assistance to Mixed Families and Other Families." See Section 7.C of this Administrative Plan for rent calculations for Mixed Families.

⁸ 24 CFR 5.518(a), "Types of Preservation Assistance Available to Mixed Families and Other Families: Continued Assistance"

⁹ 24 CFR 5.518(b), "Types of Preservation Assistance Available to Mixed Families and Other Families: Temporary Deferral of Termination of Assistance"

¹⁰ 24 CFR 5.520, "Proration of Assistance"

be entitled to housing assistance in preference to any U.S. Citizen or National resident therein who is otherwise eligible for such assistance.

c. All Adult Family Members Must Have Legal Ability to Sign a Lease

All Adults must be able to sign the Lease. If the Commonwealth of Kentucky should forbid individuals with ineligible immigration status from executing contracts (i.e., Leases or other legal binding documents), then they would be ineligible for the HCV Program.

4. Social Security Number Disclosure Eligibility Criteria¹¹

a. Applicant Household Disclosure of Social Security Numbers

i. Required Disclosure Prior to Admission of Applicant Family

Prior to admission, every Household Member regardless of age must provide LMHA with a complete and accurate Social Security Number with the exception of Household Members who meet the criteria for any one of the exceptions described in section 3.A.4.a.ii of this Administrative Plan.

If any Household Member has not yet disclosed his or her Social Security Number at the time the Family reaches the top of the waiting list, the LMHA will request in writing that the Household Member(s) disclose and document their Social Security Number within 30 calendar days. The Family will maintain their position on the waiting during this period of time. However, if all Household Members have not disclosed and documented their Social Security Number at the time a Housing Choice Voucher becomes available, the Housing Authority will offer the Voucher to the next eligible Applicant Family on the waiting list. If the Family fails to disclose and document the Household Member's Social Security Number within 30 calendar days, the Family will be removed from the waiting list.

ii. Exceptions to Required Disclosure Prior to Admission

Household Members who meet any one of the following exceptions can be admitted to the HCV Program without prior disclosure and/or verification of a Social Security Number:

(A) Household Members Who Do Not Contend Eligible Immigration Status

No post-admission verification of Social Security Number is required.

¹¹ 24 CFR 5.216, "Disclosure and Verification of Social Security and Employer Identification Numbers"; PIH 2012-10, *Verification of Social Security Numbers (SSNs), Social Security (SS) and Supplemental Security Income (SSI) Benefits; and Effective Use of the Enterprise Income Verification (EIV) System's Identity Verification Report*. For additional information regarding the verification of Social Security Numbers, see Section 10.D.

(B) Household Members Under the Age of Six Who Were Added to the Applicant's Household Within the Six-Month Period Prior to the Effective Date of the Housing Assistance Payment Contract

Applicant Families that include such a Household Member(s) will be given 90 calendar days from the effective date of the Housing Assistance Payment contract to provide documentation of a complete and accurate Social Security Number. LMHA will grant one additional 90-day grace if the Housing Authority determines that the Family's failure to comply with the Social Security Number documentation requirement was due to unforeseen circumstances and outside the control of the Family. If upon the expiration of the provided time period, the Family fails to comply with the Social Security Number disclosure and documentation requirements, LMHA will terminate the Family's assistance.

(C) Homeless Applicants to the Housing Authority's YMCA or St. Vincent DePaul Single Room Occupancy Programs¹²

Such Applicants may be admitted to the HCV Program without disclosing a Social Security Number. However, the individual must provide LMHA with such documentation within 90 calendar days from the date of admission. The Housing Authority may grant the individual one 90-day extension, if the LMHA determines that the individual's failure to comply with the Social Security Number documentation requirement was due to unforeseen circumstances and outside the control of the Family. If upon the expiration of the provided time period, the individual fails to comply with the Social Security Number disclosure and documentation requirements, the LMHA will terminate the individual's assistance.

b. Participant Household Disclosure of Social Security Numbers

The provisions below apply to all Household Members unless they do not contend eligible immigration status:

i. Social Security Numbers Not Previously Disclosed

If a person is already a Household Member and has not disclosed his or her Social Security Number, it must be disclosed at the next Regularly-Scheduled or Interim Re-Examination.

ii. Assignment of a New Social Security Number

If a Household Member has been assigned a new Social Security Number, it must be disclosed at the next Regularly-Scheduled or Interim Re-Examination.

¹² See Appendix 8 for more information about these programs.

iii. Elderly Household Members

Household Members age 62 or older as of January 31, 2010, whose initial eligibility determination was begun before January 31, 2010, are exempt from the required disclosure of their Social Security Number. This exemption continues even if the individual moves to a new assisted unit.

iv. New Household Members Age Six or Older

New Household Members age six or older must provide a complete and accurate Social Security Number prior to being added to the Household.

v. New Household Members Under the Age of Six

If the new Household Member is under the age of six and has not been assigned a Social Security Number, the Family will have 90 calendar days after the child is added to the Household to provide a complete and accurate Social Security Number. The Housing Authority may grant one 90-day extension for newly added Household Members under the age of 6 if in its sole discretion it determines that the Family's failure to comply was due to circumstances that could not have reasonably been foreseen and was outside the control of the Family.

5. Consent Authorization Documents Eligibility Criteria¹³

- a. In order to be eligible for the HCV Program, each Family Member who is at least 18 years of age and each Family Head, Co-Head, and spouse regardless of age, shall sign one or more Consent Forms.
- b. The Consent Form(s) must contain, at a minimum, the following:
 - i. A provision authorizing HUD and the LMHA to obtain from State Wage Information Collection Agencies any information or materials necessary to complete or verify the application for participation or for eligibility for continued occupancy;
 - ii. A provision authorizing HUD or the LMHA to verify with previous or current employers Income Information pertinent to the Family's eligibility for or level of assistance;
 - iii. A provision authorizing HUD to request income return information from the Internal Revenue Service and the Social Security Administration for the sole purpose of verifying Income Information pertinent to the Family's eligibility or level of benefits; and
 - iv. A statement that the authorization to release the information requested by the Consent Form expires 24 months after the date the Consent Form is signed.¹⁴

¹³ 24 CFR 5.230, "Consent by Assistance Applicants and Participants"; 24 CFR 5.232, "Penalties for Failing to Sign Consent Forms"

See Appendix 10 for alternate requirements applicable only to alternate rent policy group Families.

6. College Student Eligibility Criteria¹⁵

No assistance shall be provided under the HCV Program to any individual who:

- a. Is enrolled as a Student at an institution of higher education;¹⁶
- b. Is under 24 years of age;
- c. Is not a Veteran of the U.S. military;
- d. Is unmarried;
- e. Does not have a Dependent child;
- f. Is not a Person with Disabilities and was not receiving assistance under section 8 of the U.S. Housing Act of 1937 Act as of November 30, 2005; and
- g. Is not otherwise individually eligible, or has parents who, individually or jointly, are not eligible on the basis of income to receive assistance through the HCV Program.

B. GROUNDS FOR DENIAL¹⁷

1. LMHA Grounds for Denial¹⁸

The LMHA will deny assistance to any Applicant Family, or Household Member thereof, who:¹⁹

- a. Does not meet one or more of the eligibility criteria listed in Section 3.A of this Administrative Plan;
- b. Fails to complete any aspect of the application or lease-up process;

¹⁴ MTW Activity #4-2007, “Rent Simplification for PH and HCV Programs - Alternate Year Reexaminations of Elderly and Disabled Families,” as amended in the Housing Authority’s FY 2014 MTW Annual Plan

¹⁵ 24 CFR 5.612, “Restrictions on Assistance to Students Enrolled in an Institution of Higher Education”

¹⁶ See 20 U.S.C. 1001-1002 for definition of “Institution of Higher Education.”

¹⁷ This section lists grounds for which the LMHA will deny assistance. Owners are also permitted to screen potential Tenants for suitability as described in Section 6.H of this Administrative Plan.

¹⁸ PIH 2015-19, *Guidelines for Public Housing Agencies (PHAs) and Owners of Federally-Assisted Housing on Excluding the Use of Arrest Records in Housing Decisions*

¹⁹ For additional information regarding mandatory Public Housing Agency screening of Applicants who are ex-offenders or current abusers of alcohol or illegal drugs, see: Donovan, Shaun and Sandra B. Henriquez, “Letter from the HUD Secretary and Assistant Secretary for Public and Indian Housing to Public Housing Agency Executive Directors,” 17 June 2011

- c. Is an individual found to have manufactured or produced methamphetamine on the premises of Federally Assisted Housing;
- d. Is a sex offender subject to a lifetime registration requirement under a state sex offender registration program;
- e. Is currently engaging in illegal use of a drug;
- f. Is an individual whose illegal drug use, alcohol use, or pattern of drug or alcohol abuse may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents; or
- g. Was evicted from Federally Assisted Housing within the past three years because of Drug-Related Criminal Activity. The three year limit is based on the date of such eviction, not the date the crime was committed. However, the LMHA may admit the Household if the Housing Authority determines that the evicted Household Member who engaged in Drug-Related Criminal Activity has successfully completed a supervised drug rehabilitation program, including those supervised by drug courts, or that the circumstances leading to eviction no longer exist.

Before any Applicant is denied assistance, they will be notified of the proposed action in writing and given the opportunity to request an informal review in accordance with Section 4.F of this Administrative Plan.

The fact that an Applicant is or has been a victim of Domestic Violence, Dating Violence, Sexual Assault, or Stalking is not an appropriate basis for denial of HCV Program assistance or for denial of admission, if the Applicant otherwise qualifies for assistance or admission.²⁰ Additional information regarding protections available to Applicants under the Violence Against Women Act can be found in Section 2.F of this Administrative Plan.

2. Use of the Dru Sjodin National Sex Offender Website to Determine Whether Assistance Should Be Denied

The LMHA will check the U.S. Department of Justice’s Dru Sjodin National Sex Offender website to ensure that no Adult Household Member is registered as a lifetime sex offender under any state sex offender registration program.²¹ The Dru Sjodin National Sex Offender Database is an online, searchable database, which combines the data from individual state sex offender registries for all 50 states, the District of Columbia, U.S. territories, and Indian Country. This database is open to the public and can be accessed at the following web address:

<http://www.nsopw.gov/>

If an Applicant is about to be denied housing based on information obtained through

²⁰ 24 CFR 982.552, “PHA Denial or Termination of Assistance for Family”

²¹ PIH 2012-28, *State Registered Lifetime Sex Offenders in Federally Assisted Housing*

the Dru Sjodin National Sex Offender website, both the Head of Household and the Household Member with the criminal record will be provided a copy of the web search results. The Family will be given an opportunity to dispute the accuracy of the information and to request an informal review in accordance with Section 4.F of this Administrative Plan.²²

²² 24 CFR 982.553, “Denial of Admission and Termination of Assistance for Criminals and Alcohol Abusers”

4. THE ADMISSIONS PROCESS

A. ADMISSIONS PROCESS OVERVIEW

Note: To make application to the Louisville Metro Housing Authority's (LMHA) Housing Choice Voucher (HCV) Program, an individual must be at least 18 years of age or an Emancipated Minor.

The application process involves two phases:

1. The Pre-Application

The first phase (known as the pre-application) requires the Applicant Family to complete and return to the LMHA an initial application for housing assistance. This brief form asks the Family to provide limited basic information including name, address, phone number, Family composition and Family unit size, racial and/or ethnic designation of the head of household, and information establishing any preferences to which the Family may be entitled. This first phase results in the Family's placement on the waiting list.

2. The Full Application

The second phase (known as the full application) begins when the Applicant Family nears the top of the waiting list, and includes the following steps:

- a. The Applicant Family attends a New Family Orientation;
- b. LMHA staff verifies the Family is eligible for any admissions preference they claimed on their pre-application;
- c. The Family is scheduled for an eligibility appointment;
- d. LMHA staff determines whether or not the Family is eligible for admission to the Housing Authority's HCV Program;
- e. The Family attends an HCV Program briefing (see Section 6);
- f. The Family is issued a Housing Choice Voucher, and begins their search for a dwelling unit to lease (see Section 6);
- f. The Family submits a Request for Tenancy Approval to the LMHA, and the LMHA conducts an inspection to ensure that the dwelling unit is decent, safe, and sanitary (see Section 6);
- g. The Family signs a lease and begins to receive assistance (see Section 6).

B. THE PRE-APPLICATION

1. Completing the Pre-Application

Families wishing to apply for the HCV Program will be required to complete a pre-application for housing assistance. Pre-applications may be obtained at 801 Vine Street Louisville, KY 40204 or will be mailed to interested Families upon request. A copy of the pre-application can also be downloaded from the Housing Authority's website (www.lmha1.org).

Completed pre-applications must be returned to P. O. Box 189, Louisville, KY 40201-0189.

When the LMHA receives the Applicant Family's completed pre-application, the postmark date recorded on the envelope containing the pre-application is used to determine the order in which the Family's name is added to the HCV Program's waiting list. If the postmark date is a business day, that date is used. If the postmark date is not a business day, the date of the next business day is used. If multiple pre-applications are dated the same business day, a randomized, objective method will be used to decide the order in which these Families are added to the waiting list.

2. Assistance Available to Persons with Disabilities

Persons with disabilities who require a reasonable accommodation in order to complete a pre-application may contact the LMHA to make special arrangements for assistance.

Any Applicant with a hearing or speech impairment can receive assistance contacting the Housing Authority by dialing 7-1-1 to reach the Kentucky Telephone Relay Service, or may contact the LMHA directly by dialing 502-587-0831 to be connected using a Telecommunication Device for the Deaf (TDD).

If an Applicant is visually impaired, all notices can be made available in appropriate alternate formats.

3. Reporting Changes to Applicant Information

While on the waiting list, Applicant Families are required to report changes related to their address, Family composition, or their eligibility for any waiting list preference:

Changes may reported by writing:

Attention: Waiting List
Louisville Metro Housing Authority
P.O. Box 189
Louisville, Kentucky 40201-0189

The LMHA prefers that families use the Pre-Application Update Form, which is available at the 801 Vine Street Office or online at the Housing Authority's website (www.lmha1.org).

The LMHA will annotate the Family's file and will update their place on the waiting list if appropriate.

C. WAITING LIST MANAGEMENT

1. Opening and Closing the Waiting List¹

a. Opening the Waiting List

Opening of the waiting list will be announced via public notice that applications for the HCV Program will again be accepted. The public notice will state where, when, and how to apply. The notice will be published in a local newspaper of general circulation, and also by any available minority media. The public notice will state any limitations to who may apply.

The notice will state that Applicants already on waiting lists for other housing programs must apply separately for this program, and that such Applicants will not lose their place on other waiting lists when they apply for the HCV Program. The notice will include the Fair Housing logo and slogan and otherwise be in compliance with HUD Fair Housing requirements.

b. Closing the Waiting List

Closing of the waiting list will be announced via public notice. The public notice will state the date the waiting list will be closed. The public notice will be published in a local newspaper of general circulation, and also by any available minority media.

2. Waiting List Organization

a. Determining Waiting List Placement

Applicant Families will be added to the waiting list according to the postmark date associated with their completed pre-application. If the postmark date is a business day, that date is used. If the postmark date is not a business day, the date of the next business day is used. If multiple pre-applications are dated the same business day, a randomized, objective method will be used to decide the order in which these Families are added to the waiting list.

All Applicants who claim eligibility for at least one preference will be listed before Applicants who do not claim eligibility for any preference.

¹ 24 CFR 982.206, Waiting List: Opening and Closing; Public Notice

b. *Preferences*²

Consistent with the Housing Authority's Moving to Work (MTW) Annual Plan; the Consolidated Plan that covers the LMHA jurisdiction; and local housing needs and priorities, the Housing Authority will give an admissions preference to Applicant Families that meet at least one of the following criteria:

- i. Applicant Families that successfully completed the Housing Authority's HCV Homeownership Program by becoming economically independent, and who still own and reside in the formerly assisted unit, but who now, through extenuating services, need HCV assistance again.
- ii. Applicant Families that have applied to (and met the admissions criteria for) one of the Housing Authority's Special Referral Programs. Information on applying to these Programs can be found in Appendix 7.
- iii. Public Housing Program Participant Families graduating from the Housing Authority's Special Referral Program with Family Scholar House in good standing. Applicant Family eligibility for this preference must be verified by Family Scholar House.
- iv. Applicant Families referred by the Family Health Centers Common Assessment Team that include an Adult Household Member who is a Homeless veteran. For the purpose of determining eligibility for this preference, the term "veteran" includes anyone who wore the uniform of any of the military forces. It does not include National Guard members who were never called up for service.³ Families that believe they may qualify for this admissions preference should contact:

Family Health Centers Common Assessment Team
1300 S. 4th St., Suite 200
Louisville, KY 40208
Phone: (502) 773-3811
Website: <http://www.fhclouisville.org/health-services/healthcare-for-the-homeless>

- v. Applicant Families referred by the Family Health Centers Common Assessment Team that are currently assisted through a homeless services voucher. LMHA will not serve more than 200 Families admitted through this preference at any given time.⁴ Families that believe they may qualify for this admissions preference should contact:

² 24 CFR 982.202, How Applicants Are Selected: General Requirements and 24 CFR 982.207, Waiting List: Local Preferences in Admission to Program

³ *RX: Housing Veterans*. Report to Mayor Fischer on Ending Veteran Homelessness in Louisville, Kentucky. 5 December 2014.

⁴ Notice PIH 2013-15, *Guidance on Housing Individuals and Families Experiencing Homelessness through the Public Housing and Housing Choice Voucher Program*

Family Health Centers Common Assessment Team
1300 S. 4th St., Suite 200
Louisville, KY 40208
Phone: (502) 773-3811
Website: <http://www.fhclouisville.org/health-services/healthcare-for-the-homeless>

The LMHA will not deny a local preference, nor otherwise exclude or penalize an Applicant Family, solely because the Family resides in public housing.

c. Selection from the Waiting List

All admissions preferences will be treated equally. For the purpose of waiting list placement, an Applicant Family that is eligible for more than one preference will be treated the same as a Family with only one preference.

The date the pre-application was postmarked will be utilized to determine the sequence in which preference holders are added to the waiting list. If the postmark date is a business day, that date is used. If the postmark date is not a business day, the date of the next business day is used. If multiple pre-applications are dated the same business day, a randomized, objective method will be used to decide the order in which these Families are added to the waiting list.

Non-preference holders will be listed on the waiting list after preference holders. If the postmark date is a business day, that date is used. If the postmark date is not a business day, the date of the next business day is used. If multiple pre-applications are dated the same business day, a randomized, objective method will be used to decide the order in which these Families are added to the waiting list.

Notwithstanding the above, if necessary to meet the statutory requirement that 75% of newly admitted Participant Families in any fiscal year be Extremely Low-Income Families, the LMHA retains the right to skip higher income Applicant Families on the waiting list to reach Extremely Low-Income Families. This measure will be taken only if it appears that the statutory goal will not otherwise be met. To ensure this goal is met, the Housing Authority will monitor the incomes of newly admitted Participant Families and the incomes of Applicant Families on the waiting list.⁵

If there are not enough Extremely Low-Income Applicant Families on the waiting list, the LMHA will conduct outreach on a non-discriminatory basis to attract these Families.

d. Removing an Applicant Family from the Waiting List⁶

The LMHA will not remove an Applicant Family from the waiting list unless:

⁵ 24 CFR 982.201, Eligibility and Targeting

⁶ 24 CFR 982.204, Waiting List: Administration of Waiting List

- i. The person listed as the head of household on the pre-application requests their Family be removed;
- ii. The Applicant Family fails to respond to a written request for information or to a request to declare their continued interest in the HCV Program;
- iii. The Applicant Family misses scheduled appointments (see subsection D(2)); or
- iv. The Applicant Family does not meet either the eligibility or screening criteria for the HCV Program.
- v. The Applicant has been issued a Housing Choice Voucher.

The reason the Family is removed from the waiting list will be documented in the Family's file. Once closed, the file will be retained for three years.

*e. Purging the Waiting List*⁷

The LMHA will purge its waiting list when the Housing Authority determines such action is necessary to ensure that the pool of Applicant Families reasonably represents interested Families. Waiting list purges also enable the LMHA to update information regarding Applicant Family address, Family composition, and preferences.

The purge will consist of the LMHA mailing via first class mail a form to be completed by the Applicant Family and returned to the Housing Authority within a specified number of calendar days. If the envelope is returned as undeliverable or if no response is received from the Family within the specified time frame, the Applicant Family will be removed from the waiting list. If the envelope is returned with a forwarding address on it, the LMHA will mail the form to the new address, with a new deadline for response.

Applicant Families will be advised when they sign up for the waiting list that they need to promptly update the LMHA on all changes to address, Family composition, and eligibility for waiting list preferences.

D. THE FULL APPLICATION

1. The Full Application Process

When an Applicant Family nears the top of the waiting list, they will be invited to attend a New Family Orientation.

⁷ 24 CFR 982.204, Waiting List: Administration of Waiting List and *HCV Program Guidebook*, 4-7

Following the Orientation, LMHA staff will verify the Family's eligibility for any waiting list preference they have claimed. If the LMHA determines that the Family is not eligible for a waiting list preference, they will be placed back on the waiting list behind all Families claiming eligibility for any preference and according to the date the Family's pre-application was postmarked. If the postmark date is a business day, that date is used. If the postmark date is not a business day, the date of the next business day is used.

The LMHA will notify the Family in writing of this determination and give them the opportunity to request an informal review (see subsection F).

Once the Applicant Family has attended the New Family Orientation (and had their waiting list preference verified, if applicable), the Family will be scheduled for an eligibility appointment.

2. Missed Appointments

During the full application process, any Applicant Family that fails to keep a scheduled appointment, and does not contact the LMHA before the originally scheduled appointment time to re-schedule, will be sent a notice of denial. The full application process extends from the time the Family is invited to attend a New Family Orientation until the time they sign a lease.

The Applicant Family will be offered the right to an informal review before being removed from the waiting list (see subsection F for additional information on the informal review process).

Scheduled appointments include, but are not limited to, New Family Orientations, eligibility appointments, and briefings.

E. NON-WAITING LIST ADMISSIONS

1. Special Admissions When Assistance Is Targeted by HUD⁸

Occasionally, the LMHA receives HCV (Section 8) funding from HUD that is targeted for Families living in specified units. In these cases, the LMHA must use the assistance for Families living in these units. If necessary to meet the HUD requirements associated with this funding, the LMHA may admit Applicant Families that are not on the Housing Authority's waiting list or admit Applicant Families without considering their waiting list position.

The following are examples of types of program funding that may be targeted for a Family living in a specified unit:

⁸ 24 CFR 982.203, "Special Admissions (Non-Waiting List): Assistance Targeted by HUD"

- a. A Family displaced because of demolition or disposition of a public housing project;
- b. A Family residing in a multifamily rental housing project when HUD sells, forecloses or demolishes the project;
- c. For housing covered by the Low Income Housing Preservation and Resident Homeownership Act of 1990 (41 U.S.C. 4101 *et seq.*):
 - i. A non-purchasing Family residing in a project subject to a homeownership program (under 24 CFR 248.173); or
 - ii. A Family displaced because of mortgage prepayment or voluntary termination of a mortgage insurance contract (as provided in 24 CFR 248.165);
- d. A Family residing in a project covered by a project-based Section 8 HAP contract at or near the end of the HAP contract term; and
- e. A non-purchasing Family residing in a HOPE 1 or HOPE 2 project.

2. Special Purpose Vouchers

Occasionally, the LMHA receives an allocation of HCV vouchers from HUD that is targeted to assist Families that meet specified eligibility criteria. Applicants for these vouchers are not selected through the Housing Authority's waiting list, but through a separate selection process determined by HUD.

The LMHA currently has HCV vouchers designated to assist homeless veterans. For information on how to apply for these vouchers, see Appendix 6.

Once the Family has begun participation in the VASH Program, a Department of Veterans Affairs Medical Center determination that the Family no longer requires case management is not grounds for termination of assistance. In such cases, the LMHA will offer the Family continued assistance through one of its tenant-based HCV vouchers, in order to free up a VASH voucher for another eligible Family referred by the Department of Veterans Affairs Medical Center. If the Housing Authority has no tenant-based HCV voucher to offer the Family, the Family will retain their VASH voucher until such time as the LMHA has an available tenant-based HCV voucher to offer the Family.⁹

3. The Single Room Occupancy (SRO) Program

Through HUD's Single Room Occupancy (SRO) Program, the LMHA provides Section 8 rental assistance for homeless individuals. Individuals assisted under the SRO

⁹ 77 FR 17086, *Section 8 Housing Choice Vouchers: Revised Implementation of the HUD-VA Supportive Housing Program*

Program are not selected through the Housing Authority's HCV Program waiting list. Instead, they must apply directly to the designated housing development receiving assistance. For information on how to apply for assistance through the SRO Program, see Appendix 9.

Moving out of an SRO-assisted unit is not grounds for termination of assistance. LMHA will offer lease-compliant Families continued assistance through the use of a tenant-based HCV voucher, should the LMHA have a voucher available at the time of the Family's move.

F. INFORMAL REVIEW¹⁰

1. Notification of Removal from Waiting List or Denial of Assistance

Any Applicant Family that is being removed from the waiting list or that is being denied assistance because they do not meet the admissions criteria for the Housing Authority's HCV Program will be notified by the LMHA, in writing, that they have 10 calendar days from the date of the written correspondence, to request an informal review in writing or to present documentation demonstrating that the Housing Authority's reason for removing them from the waiting list or for denying them assistance is invalid.

The notification letter will contain a brief statement of the reason(s) for the decision, describe how the Applicant may obtain an informal review, and also indicate that the Applicant Family will be removed from the waiting list if they fail to respond within the timeframe specified.

If the LMHA denies admission to the Housing Authority's HCV Program on the basis of a criminal record, the LMHA will provide the person with the criminal record (i.e., the Family member) and the Applicant head of household with a copy of the criminal record.

The LMHA's system of removing Applicant Families from the waiting list will not violate the rights of persons with disabilities. If an Applicant's failure to respond to a request for information or updates was caused by the Applicant's disability (as verified by the LMHA), the Housing Authority will provide a reasonable accommodation. For additional information on the reasonable accommodation process, see Section 2(B).

2. Informal Review Process

- a. The review will be conducted by any person or persons designated by the LMHA other than the person who made or approved the decision under review or a subordinate of this person.

¹⁰ 24 CFR 982.554, Informal Review for Applicant

**Individual/Family Vulnerability Index-SPDAT Consent
Kentucky Homeless Management Information System (KYHMIS)
ACKNOWLEDGEMENT and RELEASE OF INFORMATION**

Hello, my name is _____ and I work with the Common Assessment Team at Family Health Centers Phoenix. I am here today to talk to you about your household’s housing and service needs. If you give permission, I will ask you some questions that will take approximately 15-20 minutes of your time. These questions concern your household’s health, homelessness, and different risks that you might experience. Completing the survey is not a guarantee of obtaining housing or any services. However, it does allow your household to be considered for referral whenever resources come available in the community. You also help us document the need for funding for homeless services in the community.

Your participation today is voluntary. You may skip any questions that you do not want to answer or end the interview at any point if you feel uncomfortable. You are only eligible to complete one Common Assessment per year. Please take time to answer the questions as honestly and accurately as possible. The Common Assessment Team may request additional information to verify your responses if necessary. Providing false information could make you ineligible for housing or other services in the future.

The Common Assessment Team and Family Health Centers-Phoenix participates in the Kentucky Homeless Management Information System (HMIS). HMIS is a database where information about your use of homeless services is stored and shared with other agencies in the community for the purposes of evaluating your service needs and coordinating service delivery. By sharing data, agencies can serve your needs easier and quicker. All records are confidential within participating agencies. You have a right to withdraw this consent at any time. You can request a copy of the privacy policy at any time. Your signature below indicates that you give consent to participate today and permission for Family Health Centers-Phoenix to share your information with other agencies that participate in the KYHMIS.

Signature of Client, Guardian, or Power of Attorney

Date

Signature of Witness

Date

Dependent First Name	Dependent Last Name	Social Security Number	Date of Birth

Louisville VI-SPDAT Version 2 – Revised 4/23/18

Client Name/Nickname:	HMIS:
Assessor's Name/Agency:	Date:

General

What is your age?	_____ <input type="checkbox"/> Refused
IF THE PERSON IS 60 YEARS OF AGE OR OLDER, THEN SCORE 1	SCORE:

A. History of Housing and Homelessness

1. Where do you sleep most frequently? (check one)	<input type="checkbox"/> Shelters <input type="checkbox"/> Transitional Housing <input type="checkbox"/> Safe Haven <input type="checkbox"/> Outdoors <input type="checkbox"/> Other (specify): _____ <input type="checkbox"/> Refused
IF THE PERSON ANSWERS ANYTHING OTHER THAN "SHELTER", "TRANSITIONAL HOUSING", OR "SAFE HAVEN", THEN SCORE 1.	SCORE:
2. How long has it been since you lived in permanent stable housing?	_____ <input type="checkbox"/> Refused
3. In the last three years, how many times have you been homeless?	_____ <input type="checkbox"/> Refused
IF THE PERSON HAS EXPERIENCED 1 OR MORE CONSECUTIVE YEARS OF HOMELESSNESS, AND/OR 4+ EPISODES OF HOMELESSNESS, THEN SCORE 1.	SCORE:

B. Risks

4. In the past six months, how many times have you...	
a) Received health care at an emergency department/room?	_____ <input type="checkbox"/> Refused
b) Taken an ambulance to the hospital?	_____ <input type="checkbox"/> Refused
c) Been hospitalized as an inpatient?	_____ <input type="checkbox"/> Refused
d) Used a crisis service, including sexual assault crisis, mental health crisis, family/intimate violence, distress centers and suicide prevention hotlines?	_____ <input type="checkbox"/> Refused
e) Talked to the police because you witnessed a crime, were the victim of a crime, or the alleged perpetrator of a crime or because the police told you that you must move along?	_____ <input type="checkbox"/> Refused
f) Stayed one or more nights in a holding cell, jail or prison, whether that was a short-term stay like the drunk tank, a longer stay for a more serious offense, or anything in between?	_____ <input type="checkbox"/> Refused
IF THE TOTAL NUMBER OF INTERACTIONS EQUALS 4 OR MORE, THEN SCORE 1 FOR EMERGENCY SERVICE USE.	SCORE:
5. Have you been attacked or beaten up since you've become homeless?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
6. Have you threatened to or tried to harm yourself or anyone else in the last year?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR RISK OF HARM.	SCORE:
7. Do you have any legal stuff going on right now that may result in you being locked up, having to pay fines, or that make it more difficult to rent a place to live?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES," THEN SCORE 1 FOR LEGAL ISSUES.	SCORE:

8. Does anybody force or trick you to do things that you do not want to do?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
9. Do you ever do things that may considered risky like exchange sex for money, run drugs for someone, have unprotected sex with someone you don't know, share a needle, or anything like that?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR RISK OF EXPLOITATION.	SCORE:

C. Socialization & Daily Functioning

10. Is there any person, past landlord, business, bookie, dealer, or government group like the IRS that thinks you owe them money?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
11. Do you get any money from the government, a pension, an inheritance, working under the table, a regular job, or anything like that?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO QUESTION 10 OR "NO" TO QUESTION 11, THEN SCORE 1 FOR MONEY MANAGEMENT.	SCORE:
12. Do you have planned activities, other than just surviving, that make you feel happy and fulfilled?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "NO," THEN SCORE 1 FOR MEANINGFUL DAILY ACTIVITY.	SCORE:
13. Are you currently able to take care of basic needs like bathing, changing clothes, using a restroom, getting food and clean water and other things like that?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "NO," THEN SCORE 1 FOR SELF-CARE.	SCORE:
14. Is your current homelessness in any way caused by a relationship that broke down, an unhealthy or abusive relationship, or because family or friends caused you to become evicted?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES," THEN SCORE 1 FOR SOCIAL RELATIONSHIPS.	SCORE:

D. Wellness

15. Have you ever had to leave an apartment, shelter program, or other place you were staying because of your physical health?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
16. Do you have any chronic health issues with your liver, kidneys, stomach, lungs or heart?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
17. If there was space available in a program that specifically assists people that live with HIV or AIDS, would that be of interest to you?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
18. Do you have any physical disabilities that would limit the type of housing you could access, or would make it hard to live independently because you'd need help?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
19. When you are sick or not feeling well, do you avoid getting help?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
20. <i>FOR FEMALE RESPONDENTS ONLY:</i> Are you currently pregnant?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A or Refused
IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR PHYSICAL HEALTH.	SCORE:
21. Has your drinking or drug use led you to being kicked out of an apartment or program where you were staying in the past?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
22. Will drinking or drug use make it difficult for you to stay housed or afford your housing?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR SUBSTANCE USE.	SCORE:
23. Have you ever had trouble maintaining your housing, or been kicked out of an apartment, shelter program or other place you were staying, because of:	
a) A mental health issue or concern?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
b) A past head injury?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
c) A learning disability, developmental disability, or other impairment?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
24. Do you have any mental health or brain issues that would make it hard for you to live independently because you'd need help?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused

IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR MENTAL HEALTH.	SCORE:
IF THE RESPONENT SCORED 1 FOR PHYSICAL HEALTH AND 1 FOR SUBSTANCE USE AND 1 FOR MENTAL HEALTH, SCORE 1 FOR TRI-MORBIDITY.	SCORE:
25. Are there any medications that a doctor said you should be taking that, for whatever reason, you are not taking?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
26. Are there any medications like painkillers that you don't take the way the doctor prescribed or where you sell the medication?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF THE ABOVE, SCORE 1 FOR MEDICATIONS.	SCORE:
27. <i>YES OR NO:</i> Has your current period of homelessness been caused by an experience of emotional, physical, psychological, sexual, or other type of abuse, or by any other trauma you have experienced?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES", SCORE 1 FOR ABUSE AND TRAUMA.	SCORE:

Scoring Summary

DOMAIN	SUBTOTAL
PRE-SURVEY	
A. History of HOUSING & HOMELESSNESS	
B. RISKS	
C. SOCIALISATION & DAILY FUNCTIONS	
D. WELLNESS	
GRAND TOTAL:	

Follow-up Questions

On a regular day, where is it easiest to find you and what time of day is it easiest to do so?	
Is there a phone number and/or email where someone can safely get in touch with you or leave a message?	
Is there an agency, outreach worker, or case manager that you work with regularly or trust more than others? If so, who is that?	
Who is someone that you could provide as an emergency contact?	

**Individual/Family Vulnerability Index-SPDAT Consent
Kentucky Homeless Management Information System (KYHMIS)
ACKNOWLEDGEMENT and RELEASE OF INFORMATION**

Hello, my name is _____ and I work with the Common Assessment Team at Family Health Centers Phoenix. I am here today to talk to you about your household’s housing and service needs. If you give permission, I will ask you some questions that will take approximately 15-20 minutes of your time. These questions concern your household’s health, homelessness, and different risks that you might experience. Completing the survey is not a guarantee of obtaining housing or any services. However, it does allow your household to be considered for referral whenever resources come available in the community. You also help us document the need for funding for homeless services in the community.

Your participation today is voluntary. You may skip any questions that you do not want to answer or end the interview at any point if you feel uncomfortable. You are only eligible to complete one Common Assessment per year. Please take time to answer the questions as honestly and accurately as possible. The Common Assessment Team may request additional information to verify your responses if necessary. Providing false information could make you ineligible for housing or other services in the future.

The Common Assessment Team and Family Health Centers-Phoenix participates in the Kentucky Homeless Management Information System (HMIS). HMIS is a database where information about your use of homeless services is stored and shared with other agencies in the community for the purposes of evaluating your service needs and coordinating service delivery. By sharing data, agencies can serve your needs easier and quicker. All records are confidential within participating agencies. You have a right to withdraw this consent at any time. You can request a copy of the privacy policy at any time. Your signature below indicates that you give consent to participate today and permission for Family Health Centers-Phoenix to share your information with other agencies that participate in the KYHMIS.

Signature of Client, Guardian, or Power of Attorney

Date

Signature of Witness

Date

Dependent First Name	Dependent Last Name	Social Security Number	Date of Birth

Louisville Family VI-SPDAT Version 2 – Revised 4/23/18

Head of House Name/Nickname:	HMIS#:
Spouse Name/Nickname:	HMIS#:
Assessor's Name/Agency:	Date:

General

What is your age?	_____ <input type="checkbox"/> Refused
What is your spouse's age (if applicable)?	_____ <input type="checkbox"/> Refused
IF EITHER HEAD OF HOUSEHOLD IS 60 YEARS OF AGE OR OLDER, THEN SCORE 1	SCORE:

Children

1. How many children under the age of 18 are currently with you?	_____ <input type="checkbox"/> Refused
2. How many children under the age of 18 are not currently with your family, but you have reason to believe they will be joining you when you get housed?	_____ <input type="checkbox"/> Refused
3. <i>IF HOUSEHOLD INCLUDES A FEMALE:</i> Is any member of the family currently pregnant?	
4. Please provide a list of children's names and ages:	
First Name	Last Name Age
IF THERE IS A SINGLE PARENT WITH 2+ CHILDREN, AND/OR A CHILD AGED 11 OR YOUNGER, AND/OR A CURRENT PREGNANCY, THEN SCORE 1 FOR FAMILY SIZE. IF THERE ARE TWO PARENTS WITH 3+ CHILDREN, AND/OR A CHILD AGED 6 OR YOUNGER, AND/OR A CURRENT PREGNANCY, THEN SCORE 1 FOR FAMILY SIZE.	SCORE:

A. History of Housing and Homelessness

<p>5. Where do you and your family sleep most frequently? (check one)</p>	<p><input type="checkbox"/> Shelters <input type="checkbox"/> Transitional Housing <input type="checkbox"/> Safe Haven <input type="checkbox"/> Outdoors <input type="checkbox"/> Other (specify): <hr/> <input type="checkbox"/> Refused</p>
<p>IF THE FAMILY ANSWERS ANYTHING OTHER THAN “SHELTER”, “TRANSITIONAL HOUSING”, OR “SAFE HAVEN”, THEN SCORE 1.</p>	<p>SCORE:</p>
<p>6. How long has it been since you and your family lived in permanent stable housing?</p>	<p>_____ <input type="checkbox"/> Refused</p>
<p>7. In the last three years, how many times have you and your family have been homeless?</p>	<p>_____ <input type="checkbox"/> Refused</p>
<p>IF THE FAMILY HAS EXPERIENCED 1 OR MORE CONSECUTIVE YEARS OF HOMELESSNESS, AND/OR 4+ EPISODES OF HOMELESSNESS, THEN SCORE 1.</p>	<p>SCORE:</p>

B. Risks

<p>8. In the past six months, how many times have you or anyone in your family...</p>	
<p>a) Received health care at an emergency department/room?</p>	<p>_____ <input type="checkbox"/> Refused</p>
<p>b) Taken an ambulance to the hospital?</p>	<p>_____ <input type="checkbox"/> Refused</p>
<p>c) Been hospitalized as an inpatient?</p>	<p>_____ <input type="checkbox"/> Refused</p>
<p>d) Used a crisis service, including sexual assault crisis, mental health crisis, family/intimate violence, distress centers and suicide prevention hotlines?</p>	<p>_____ <input type="checkbox"/> Refused</p>
<p>e) Talked to the police because you witnessed a crime, were the victim of a crime, or the alleged perpetrator of a crime or because the police told you that you must move along?</p>	<p>_____ <input type="checkbox"/> Refused</p>
<p>f) Stayed one or more nights in a holding cell, jail or prison, whether that was a short-term stay like the drunk tank, a longer stay for a more serious offense, or anything in between?</p>	<p>_____ <input type="checkbox"/> Refused</p>
<p>IF THE TOTAL NUMBER OF INTERACTIONS EQUALS 4 OR MORE, THEN SCORE 1 FOR EMERGENCY SERVICE USE.</p>	<p>SCORE:</p>

9. Have you or anyone in your family been attacked or beaten up since they've become homeless?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
10. Have you or anyone in your family threatened to or tried to harm themselves or anyone else in the last year?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR RISK OF HARM.	SCORE:
11. Do you or anyone in your family have any legal stuff going on right now that may result in them being locked up, having to pay fines, or that make it more difficult to rent a place to live?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES," THEN SCORE 1 FOR LEGAL ISSUES.	SCORE:
12. Does anybody force or trick you or anyone in your family to do things that you do not want to do?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
13. Do you or anyone in your family ever do things that may be considered to be risky like exchange sex for money, run drugs for someone, have unprotected sex with someone they don't know, share a needle, or anything like that?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR RISK OF EXPLOITATION.	SCORE:

C. Socialization & Daily Functioning

14. Is there any person, past landlord, business, bookie, dealer, or government group like the IRS that thinks you or anyone in your family owe them money?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
15. Do you or anyone in your family get any money from the government, a pension, an inheritance, working under the table, a regular job, or anything like that?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO QUESTION 14 OR "NO" TO QUESTION 15, THEN SCORE 1 FOR MONEY MANAGEMENT.	SCORE:
16. Does everyone in your family have planned activities, other than just surviving, that make them feel happy and fulfilled?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "NO," THEN SCORE 1 FOR MEANINGFUL DAILY ACTIVITY.	SCORE:

17. Is everyone in your family currently able to take care of basic needs like bathing, changing clothes, using a restroom, getting food and clean water and other things like that?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "NO," THEN SCORE 1 FOR SELF-CARE.	SCORE:
18. Is your family's current homelessness in any way caused by a relationship that broke down, an unhealthy or abusive relationship, or because other family or friends caused your family to become evicted?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES," THEN SCORE 1 FOR SOCIAL RELATIONSHIPS.	SCORE:

D. Wellness

19. Has your family ever had to leave an apartment, shelter program, or other place you were staying because of the physical health of you or anyone in your family?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
20. Do you or anyone in your family have any chronic health issues with your liver, kidneys, stomach, lungs or heart?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
21. If there was space available in a program that specifically assists people that live with HIV or AIDS, would that be of interest to you or anyone in your family?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
22. Does anyone in your family have any physical disabilities that would limit the type of housing you could access, or would make it hard to live independently because you'd need help?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
23. When someone in your family is sick or not feeling well, does your family avoid getting medical help?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR PHYSICAL HEALTH.	SCORE:
24. Has drinking or drug use by you or anyone in your family led your family to being kicked out of an apartment or program where you were staying in the past?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
25. Will drinking or drug use make it difficult for your family to stay housed or afford your housing?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR SUBSTANCE USE.	SCORE:

26. Has your family ever had trouble maintaining your housing, or been kicked out of an apartment, shelter program or other place you were staying, because of:	
a) A mental health issue or concern?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
b) A past head injury?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
c) A learning disability, developmental disability, or other impairment?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
27. Do you or anyone in your family have any mental health or brain issues that would make it hard for your family to live independently because help would be needed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF THE ABOVE, THEN SCORE 1 FOR MENTAL HEALTH.	SCORE:
28. <i>IF THE FAMILY SCORED 1 EACH FOR PHYSICAL HEALTH, SUBSTANCE USE, AND MENTAL HEALTH:</i> Does any single member of your household have a medical condition, mental health concerns, and experience with problematic substance use?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES", SCORE 1 FOR TRI-MORBIDITY.	SCORE:
29. Are there any medications that a doctor said you or anyone in your family should be taking that, for whatever reason, they are not taking?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
30. Are there any medications like painkillers that you or anyone in your family don't take the way the doctor prescribed or where they sell the medication?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF THE ABOVE, SCORE 1 FOR MEDICATIONS.	SCORE:
31. <i>YES OR NO:</i> Has your family's current period of homelessness been caused by an experience of emotional, physical, psychological, sexual, or other type of abuse, or by any other trauma you or anyone in your family have experienced?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES", SCORE 1 FOR ABUSE AND TRAUMA.	SCORE:

E. Family Unit

32. Are there any children that have been removed from the family by a child protection service within the last 180 days?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
33. Do you have any family legal issues that are being resolved in court or need to be resolved in court that would impact your housing or who may live within your housing?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF THE ABOVE, SCORE 1 FOR FAMILY LEGAL ISSUES.	SCORE:
34. In the last 180 days have any children lived with family or friends because of your homelessness or housing situation?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
35. Has any child in the family experienced abuse or trauma in the last 180 days?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
36. <i>IF THERE ARE SCHOOL-AGED CHILDREN:</i> Do your children attend school more often than not each week?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF QUESTIONS 34 OR 35, OR "NO" TO QUESTION 36, SCORE 1 FOR NEEDS OF CHILDREN.	SCORE:
37. Have the members of your family changed in the last 180 days, due to things like divorce, your kids coming back to live with you, someone leaving for military service or incarceration, a relative moving in, or anything like that?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
38. Do you anticipate any other adults or children coming to live with you within the first 180 days of being housed?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "YES" TO ANY OF THE ABOVE, SCORE 1 FOR FAMILY STABILITY.	SCORE:
39. Do you have two or more planned activities each week as a family such as outings to the park, going to the library, visiting other family, watching a family movie, or anything like that?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
40. After school, or on weekends or days when there isn't school, is the total time children spend each day where there is no interaction with you or another responsible adult...	
a) 3 or more hours per day for children aged 13 or older?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
b) 2 or more hours per day for children aged 12 or younger?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
41. <i>IF THERE ARE CHILDREN BOTH 12 AND UNDER & 13 AND OVER:</i> Do your older kids spend 2 or more hours on a typical day helping their younger sibling(s) with things like getting ready for school, helping with homework, making them dinner, bathing them, or anything like that?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Refused
IF "NO" TO QUESTION 39, OR "YES" TO ANY OF QUESTIONS 40 OR 41, SCORE 1 FOR PARENTAL ENGAGEMENT.	SCORE:

Scoring Summary

DOMAIN	SUBTOTAL
PRE-SURVEY	
A. History of HOUSING & HOMELESSNESS	
B. RISKS	
C. SOCIALISATION & DAILY FUNCTIONS	
D. WELLNESS	
E. Family Unit	
GRAND TOTAL:	

Follow-up Questions

On a regular day, where is it easiest to find you and what time of day is it easiest to do so?	
Is there a phone number and/or email where someone can safely get in touch with you or leave a message?	
Is there an agency, outreach worker, or case manager that you work with regularly or trust more than others? If so, who is that?	
Who is someone that you could provide as an emergency contact?	

LOUISVILLE CONTINUUM OF CARE RATING AND REVIEW PROCEDURE FY2018

On July 10, 2018 all CoC Members were notified of preliminary rating and review criteria. This notification gave all programs to opportunity to self-evaluate their performance and correct any data errors as needed by August 3, 2018

Upon release of the Optional Rating and Ranking Tool by HUD the Louisville CoC opted to use this tool as it incorporated most of preliminary measures given to the CoC as well as some additional criteria important to performance. The Louisville CoC also added some additional criteria to the HUD tool based on local need. The original Rating and Ranking tool is available here:

<https://www.hudexchange.info/resource/5292/project-rating-and-ranking-tool/>

In order to be considered for funding consideration all projects were required to submit the first draft of their application in eSnaps no later than August 18, 2018.

The review and ranking criteria assigned points based on positive housing outcomes by measuring exits to permanent housing. Five criteria were used to assess the severity of program participant needs. Points were awarded based on the percent of participants with zero income at entry, percent of participants with more than one disability type, percent of participants entering the project from a place not meant for human habitation, percent of participants reporting a substance abuse disorder at entry, and percent of participants reporting being a victim or domestic violence at entry.

The Louisville CoC did not receive any applications for projects from victim's service providers during the FY18 funding competition. If there had been any received, the CoC would have used data from a comparable database when available. If data was not available from a comparable database the victim service provider would have automatically received full points for that metric.

All CoC programs were notified of their project score on September 6, 2018 and given the opportunity to appeal any individual metrics or scores they felt were inaccurate.

The final project ranking was determined by the Continuum of Care Board of Directors. For more information on this see the 2018 Final Ranking Explanation.

RATING AND REVIEW CRITERIA

The following are the criteria used to rank programs, their source and calculation, and their possible scoring range. Unless otherwise noted, they were all taken from CoC APR reports run for the programs with a date range of July 1, 2017 – June 30, 2018.

Questions about rating and review criteria should be directed to Erin Rutherford at erutherford@louhomeless.org.

Performance Measures

Length of Stay (used for TH and RRH programs only). The data comes from question 22b and is the average length of stay for all program participants. The high score was 10 points.

A RRH project scored 10 points if their LOS was 270 days or less. They scored 0 points if their length of stay was 366 days or more. Those with LOS between 270 and 366 days had their scores prorated to correspond to that range so that a LOS of 318 days would receive 5 out of 10 points.

Exit to Permanent Housing. The data came from question 23a. It is the total of participants who stayed in the program and those who left to a permanent destination divided by total participants and taken as a percentage. The total points were 25. Projects scored 25 if they had 95% and 0 points if they had 75%. Those between 95% and 75% were prorated so that a program with 80% received 6.25 out of 25 points.

New or Increased Income and Earned Income. This data came from question 19a1. It is the total number of participants with a change in income divided by the total number of stayers or leavers in the program, respectively, and taken as a percentage. The CoC measured changes in earned income and non-employee income for program stayers and program leavers for a total of 4 measures. Each was worth 2.5 points. Projects received full points in earned income change for stayers and leavers at 10% and in non-employee income at 15%. They received 0 points if 0% of stayers or leavers, respectively, had any change. Those in between were prorated so that a program that had 5% of stayers increase their earned income received 1.25 of 2.5 points and a program that had 10% of leavers increase their non-employee income received 1.66 of 2.5 points.

Serve High Need Populations

Participants with Zero Income at Entry. This data came from question 16. It is the number of participants who had zero income at entry divided by the total number of participants and taken as a percentage. There were 5 possible points awarded. Projects received 5 points if there were 50% or more with zero income at entry and received 0 points if there were less than 25% at entry. Projects that fell between 50% and 25% were prorated so that a project with 40% at entry received 3 of 5.

Participants with more than one disability type. This data came from question 13a2. It is the number of participants with 2 or more disability types at entry divided by the total number of adults and taken as a percentage. There were 5 possible points awarded. Projects received 5 points if there were 50% or more with more than one disability type and received 0 points if there were less than 25% at entry. Projects that fell between 50% and 25% were prorated so that a project with 40% at entry received 3 of 5.

Participants entering project from a place not meant for human habitation. This data came from question 15. It is the total number of people who came from a place not meant for human habitation at entry divided by the total number of participants and taken as a percentage. There were 5 possible points awarded. Projects received 5 points if there were 50% or more entering project from a place not meant for human habitation and received 0 points if there were less than 25% entering project from a place not meant for human habitation. Projects that fell between 50% and 25% were prorated so that a project with 40% at entry received 3 of 5.

Project Effectiveness

Coordinated Entry Participation. Projects were ranked on their participation in the coordinated entry system. Projects who participated were awarded 10 points. Those who do not were awarded 0 points. This data came from the project applications.

Project commits to applying the housing first model. Projects received 10 points for applying the housing first model. This data came from the project applications.

Other and Local Criteria

CoC Participation. The CoC Monitoring Score was re-assigned so that projects were scored on their participation in the Continuum of Care. Points were awarded based on an internal assessment by CoC leadership and the CoC Board of Directors. There were 5 possible points.

Returns to Homelessness. The CoC elected to score projects on returns to homelessness for all three time frames rather than the one score in the original HUD Optional Rating and Ranking Tool. Each score was worth 5 points and data came from a custom modification of the 703 report. Projects were scored on returns in 0-180 days, 181-365 days, and 366-730 days looking back from March 1, 2017. A project scored 5 points if 15% or less of leavers returned to a CoC program. A project received zero points if 40% or more of leavers returned to a CoC program. Projects with between 15% and 40% returned were prorated so that a project with 25% returns received 3 of 5 points.

Substance Abuse at Entry. The CoC elected to add substance abuse as a “Serve High Need Populations” criteria. This data came from question 13a1. It is the total number of participants who had a history of alcohol, drug abuse, or both, at entry divided by the total number of adults and taken as a percentage. There were 5 possible points awarded. Projects received 5 points if there were 50% or more entering project with a history of substance abuse and received 0 points if there were less than 25%. Projects that fell between 50% and 25% were prorated so that a project with 40% at entry received 3 of 5.

Domestic Violence. The CoC elected to add history of domestic violence as a “Serve High Need Populations” criteria. This data came from question 14a. It is the total number of participants who had a history of domestic violence at entry divided by the total number of adults and taken as a percentage. There were 5 possible points awarded. Projects received 5 points if there were 50% or more entering project with a history of domestic violence and received 0 points if there were less than 25%. Projects that fell between 50% and 25% were prorated so that a project with 40% at entry received 3 of 5.

Funding Returned. Projects were graded on the amount of their funding request they returned. This data came from their ELOCCS reports. Projects received 10 points if 0% of funding was returned and 0 points if 25% or more was returned. Projects with between 0% and 25% returned were prorated so that a project with 10% of funding returned earned 6 points out of 10.

2018 NOFA Grading Criteria – HUD Scoring Guide

Data Point	Source	Calculation	High Score	CoC Average	Goal Score	Zero Score
PERFORMANCE MEASURES						
Length of Stay (TH, RRH only)	22b	Average LOS	10	6.09	TH 270 Days RRH 270 Days	TH 366 Days RRH 366 Days
Leavers to PH destination	23a	(Stayers + leavers to PH) /Participants	25	17.31	95%	75%
Change in earned income – stayers	19a1	Total with change / total stayers	2.5	0.6	10 % had increase	0% had increase
Change in non-employee income – stayers	19a1	Total with change / total stayers	2.5	1.52	15% had increase	0% had increase
Change in earned income – leavers	19a1	Total with change / total leavers	2.5	.95	10% had increase	0% had increase
Change in non-employee income – leavers	19a1	Total with change / total leavers	2.5	1.67	15% had increase	0% had increase
SERVE HIGH NEED POPULATIONS						
Had zero income at entry	16	Total / number of participants	5	1.76	50% at entry	25% at entry
2+ disabilities at entry	13a2	Total 2+ disabilities / number of adults	5	4.21	50% at entry	25% at entry
Came from place not meant for human habitation	15	Total / number of participants	5	1.57	50% at entry	25% at entry
PROJECT EFFECTIVENESS						
Is project a Coordinated Entry participant?	App		10	10	95% of entries to project from CE referrals	Less than 95% entries from CE
Does project follow housing first?	App		10	9.33	Commits to applying HF	Does not apply HF
OTHER AND LOCAL CRITERIA						
Project monitoring score / CoC Participation	CoC		5	5		
Return to homelessness 0-6 mo.	Custom	Returns in 0-180 days	5	3.93	15%	40%
Return to homelessness 6-12 mo.	Custom	Returns in 181-365 days	5	4.79	15%	40%
Return to homelessness 12-24 mo.	Custom	Returns in 366-730 days	5	4.58	15%	40%
Alcohol, drug abuse, or both at entry	13a1	Total Alcohol, Drug, and both / number of adults	5	2.98	50% at entry	25% at entry
DV History	14a	Total YES / number of adults	5	2.63	50% at entry	25% at entry
Funding Returned	App		10	7.41	0% Returned	25% Returned
Total RRH and TH			115	104.76		
Total PSH			105	96.76		
Total for all projects out of 100			100	76.58		

NEW PROJECTS RATING TOOL

Project Name: _____
 Organization Name: _____
 Project Type: _____
 Project Identifier: _____

RATING FACTOR	POINTS AWARDED	MAX POINT VALUE
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EXPERIENCE

A. Describe the experience of the applicant and sub-recipients (if any) in working with the proposed population and in providing housing similar to that proposed in the application.	<input style="width: 100%; height: 30px;" type="text"/>	out of 15
B. Describe experience with utilizing a Housing First approach. Include 1) eligibility criteria; 2) process for accepting new clients; 3) process and criteria for exiting clients. Must demonstrate there are no preconditions to entry, allowing entry regardless of current or past substance abuse, income, criminal records (with exceptions of restrictions imposed by federal, state, or local law or ordinance), marital status, familial status, actual or perceived sexual orientation, gender identity. Must demonstrate the project has a process to address situations that may jeopardize housing or project assistance to ensure that project participation is terminated in only the most severe cases.	<input style="width: 100%; height: 80px;" type="text"/>	out of 10
C. Describe experience in effectively utilizing federal funds including HUD grants and other public funding, including satisfactory drawdowns and performance for existing grants as evidenced by timely reimbursement of subrecipients (if applicable), regular drawdowns, timely resolution of monitoring findings, and timely submission of required reporting on existing grants.	<input style="width: 100%; height: 40px;" type="text"/>	out of 5
Experience Subtotal	0	out of 30

DESIGN OF HOUSING & SUPPORTIVE SERVICES

A. Extent to which the applicant 1. Demonstrate understanding of the needs of the clients to be served. 2. Demonstrate type, scale, and location of the housing fit the needs of the clients to be served 3. Demonstrate type and scale of the all supportive services, regardless of funding source, meet the needs of the clients to be served. 4. Demonstrate how clients will be assisted in obtaining and coordinating the provision of mainstream benefits 5. Establish performance measures for housing and income that are objective, measurable, trackable, and meet or exceed any established HUD, HEARTH or CoC benchmarks.	<input style="width: 100%; height: 100px;" type="text"/>	out of 15
B. Describe the plan to assist clients to rapidly secure and maintain permanent housing that is safe, affordable, accessible, and acceptable to their needs.	<input style="width: 100%; height: 30px;" type="text"/>	out of 5
C. Describe how clients will be assisted to increase employment and/or income and to maximize their ability to live independently.	<input style="width: 100%; height: 30px;" type="text"/>	out of 5
Design of Housing & Supportive Services Subtotal	0	out of 25

TIMELINESS

A. Describe plan for rapid implementation of the program documenting how the project will be ready to begin housing the first program participant. Provide a detailed schedule of proposed activities for 60 days, 120 days, and 180 days after grant award.	<input style="width: 100%; height: 40px;" type="text"/>	out of 10
Timeliness Subtotal	0	out of 10

FINANCIAL

A. Project is cost-effective - comparing projected cost per person served to CoC average within project type.	<input style="width: 100%; height: 20px;" type="text"/>	out of 5
B. Audit		
1. Most recent audit found no exceptions to standard practices	<input style="width: 100%; height: 20px;" type="text"/>	out of 5
2. Most recent audit identified agency as 'low risk'	<input style="width: 100%; height: 20px;" type="text"/>	out of 5

NEW PROJECTS RATING TOOL

Project Name: _____
 Organization Name: _____
 Project Type: _____
 Project Identifier: _____

RATING FACTOR	POINTS AWARDED	MAX POINT VALUE
3. Most recent audit indicates no findings	<input type="text"/>	out of 5
C. Documented match amount	<input type="text"/>	out of 5
D. Budgeted costs are reasonable, allocable, and allowable	<input type="text"/>	out of 20
Financial Subtotal	0	out of 45
PROJECT EFFECTIVENESS		
Coordinated Entry Participation- 95% of entries to project from CE referrals	<input type="text"/>	out of 5
Project Effectiveness Subtotal	0	out of 5
OTHER AND LOCAL CRITERIA		
Other and Local Criteria Subtotal	0	out of 0
TOTAL SCORE		
TOTAL SCORE	0	out of 115
Weighted Rating Score		out of 100

PROJECT FINANCIAL INFORMATION

CoC funding requested	<i>NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab</i>	\$ <input type="text"/> -
Amount of other public funding (federal, state, county, city)		<input type="text"/>
Amount of private funding		<input type="text"/>
TOTAL PROJECT COST		\$ <input type="text"/> -

RENEWAL/EXPANSION PROJECT RATING TOOL

Project Name: _____
 Organization Name: _____
 Project Type: _____ PSH _____
 Project Identifier: _____

RATING FACTOR	PERFORMANCE GOAL	PERFORMANCE	POINTS AWARDED	MAX POINT VALUE
PERFORMANCE MEASURES				
Length of Stay				
Exits to Permanent Housing				
Permanent Supportive-Housing	95% remain in or move to PH	<input type="text"/> %	<input type="text"/>	out of 25
Returns to Homelessness				
Within 12 months of exit to permanent housing	≤ 15% of participants return to homelessness	<input type="text"/> %	<input type="text"/>	out of 5
New or Increased Income and Earned Income				
Earned income for project stayers	10%+ increase	<input type="text"/> %	<input type="text"/>	out of 2.5
Non-employment income for project stayers	15%+ increase	<input type="text"/> %	<input type="text"/>	out of 2.5
Earned income for project leavers	10%+ increase	<input type="text"/> %	<input type="text"/>	out of 2.5
Non-employment income for project leavers	15%+ increase	<input type="text"/> %	<input type="text"/>	out of 2.5
Performance Measures Subtotal			0	out of 40
SERVE HIGH NEED POPULATIONS				
Permanent Supportive-Housing	≥ 50% of participants with zero income at entry	<input type="text"/> %	<input type="text"/>	out of 5
Permanent Supportive-Housing	≥ 50% of participants with more than one disability type	<input type="text"/> %	<input type="text"/>	out of 5
Permanent Supportive-Housing	≥ 50% of participants entering project from place not meant for human habitation	<input type="text"/> %	<input type="text"/>	out of 5
Serve High Need Populations Subtotal			0	out of 15
PROJECT EFFECTIVENESS				
Coordinated Entry Participation	≥ 95% of entries to project from CE referrals	<input type="text"/> %	<input type="text"/>	out of 5
Housing First and/or Low Barrier Implementation	Commits to applying Housing First model	<input type="text"/>	<input type="text"/>	out of 10
Project Effectiveness Subtotal			0	out of 15
OTHER AND LOCAL CRITERIA				
CoC Monitoring Score	Project is operating in conformance to CoC standards	<input type="text"/>	<input type="text"/>	out of 5
Returns to Homelessness 0-6		<input type="text"/>	<input type="text"/>	out of 5
Returns to Homelessness 6-12 mo		<input type="text"/>	<input type="text"/>	out of 5
Returns to Homelessness 12-24 mo		<input type="text"/>	<input type="text"/>	out of 5
Alcohol, Drug Abuse, or both at entry		<input type="text"/>	<input type="text"/>	out of 5
DV history at entry		<input type="text"/>	<input type="text"/>	out of 5
Funding Returned		<input type="text"/>	<input type="text"/>	out of 10
Other and Local Criteria Subtotal			0	out of 40

RENEWAL/EXPANSION PROJECT RATING TOOL

Project Name: _____
 Organization Name: _____
 Project Type: _____ PSH _____
 Project Identifier: _____

RATING FACTOR	PERFORMANCE GOAL	PERFORMANCE	POINTS AWARDED	MAX POINT VALUE
TOTAL SCORE			0	out of 110
Weighted Rating Score				out of 100

PROJECT FINANCIAL INFORMATION

CoC funding requested	<i>NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab</i>	\$ -
Amount of other public funding (federal, state, county, city)		-
Amount of private funding		-
TOTAL PROJECT COST		\$ -
CoC Amount Awarded Last Operating Year	<i>NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab</i>	\$ -
CoC Amount Expended Last Operating Year	<i>NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab</i>	\$ -
Percent of CoC funding expended last operating year		0%

RENEWAL/EXPANSION PROJECT RATING TOOL

Project Name: _____
 Organization Name: _____
 Project Type: _____ RRH _____
 Project Identifier: _____

RATING FACTOR	PERFORMANCE GOAL	PERFORMANCE	POINTS AWARDED	MAX POINT VALUE
---------------	------------------	-------------	----------------	-----------------

PERFORMANCE MEASURES

Length of Stay				
Rapid Re-Housing	Participants are placed in housing less than 270 days after referral to RRH	<input type="text"/> days	<input type="text"/> out of	10
Exits to Permanent Housing				
Rapid Re-Housing	95% move to PH	<input type="text"/> %	<input type="text"/> out of	25
Returns to Homelessness				
Within 12 months of exit to permanent housing	≤ 15% of participants return to homelessness	<input type="text"/> %	<input type="text"/> out of	5
New or Increased Income and Earned Income				
Earned income for project stayers	10%+ increase	<input type="text"/> %	<input type="text"/> out of	2.5
Non-employment income for project stayers	15%+ increase	<input type="text"/> %	<input type="text"/> out of	2.5
Earned income for project leavers	10%+ increase	<input type="text"/> %	<input type="text"/> out of	2.5
Non-employment income for project leavers	15%+ increase	<input type="text"/> %	<input type="text"/> out of	2.5
Performance Measures Subtotal			0	out of 50

SERVE HIGH NEED POPULATIONS

Rapid Re-Housing	≥ 50% of participants with zero income at entry	<input type="text"/> %	<input type="text"/> out of	5
Rapid Re-Housing	≥ 50% of participants with more than one disability type	<input type="text"/> %	<input type="text"/> out of	5
Rapid Re-Housing	≥ 50% of participants entering project from place not meant for human habitation	<input type="text"/> %	<input type="text"/> out of	5
Serve High Need Populations Subtotal			0	out of 15

PROJECT EFFECTIVENESS

Coordinated Entry Participation	≥ 95% of entries to project from CE referrals	<input type="text"/> %	<input type="text"/> out of	5
Housing First and/or Low Barrier Implementation	Commits to applying Housing First model	<input type="text"/>	<input type="text"/> out of	10
Project Effectiveness Subtotal			0	out of 15

OTHER AND LOCAL CRITERIA

CoC Monitoring Score	Project is operating in conformance to CoC standards	<input type="text"/>	<input type="text"/> out of	5
Returns to Homelessness 0-6		<input type="text"/>	<input type="text"/> out of	5
Returns to Homelessness 6-12 mo		<input type="text"/>	<input type="text"/> out of	5
Returns to Homelessness 12-24 mo		<input type="text"/>	<input type="text"/> out of	5
Alcohol, Drug Abuse, or both at entry		<input type="text"/>	<input type="text"/> out of	5
DV history at entry		<input type="text"/>	<input type="text"/> out of	5
Funding Returned		<input type="text"/>	<input type="text"/> out of	10

RENEWAL/EXPANSION PROJECT RATING TOOL

Project Name: _____
 Organization Name: _____
 Project Type: RRH
 Project Identifier: _____

RATING FACTOR	PERFORMANCE GOAL	PERFORMANCE	POINTS AWARDED	MAX POINT VALUE
	Other and Local Criteria Subtotal		0	out of 40
	TOTAL SCORE		0	out of 120
	Weighted Rating Score			out of 100

PROJECT FINANCIAL INFORMATION

CoC funding requested	<i>NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab</i>	\$	-
Amount of other public funding (federal, state, county, city)			
Amount of private funding			
TOTAL PROJECT COST		\$	-
CoC Amount Awarded Last Operating Year	<i>NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab</i>	\$	-
CoC Amount Expended Last Operating Year	<i>NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab</i>	\$	-
Percent of CoC funding expended last operating year			0%

RENEWAL/EXPANSION PROJECT RATING TOOL

Project Name: _____
 Organization Name: _____
 Project Type: _____ TH _____
 Project Identifier: _____

RATING FACTOR	PERFORMANCE GOAL	PERFORMANCE	POINTS AWARDED	MAX POINT VALUE
PERFORMANCE MEASURES				
Length of Stay				
Transitional Housing	Participants are placed in housing less than 270 days after referral to TH	<input type="text"/> days	<input type="text"/> out of	10
Exits to Permanent Housing				
Transitional Housing	95% move to PH	<input type="text"/> %	<input type="text"/> out of	25
Returns to Homelessness				
Within 12 months of exit to permanent housing	≤ 15% of participants return to homelessness	<input type="text"/> %	<input type="text"/> out of	5
New or Increased Income and Earned Income				
Earned income for project stayers	10%+ increase	<input type="text"/> %	<input type="text"/> out of	2.5
Non-employment income for project stayers	15%+ increase	<input type="text"/> %	<input type="text"/> out of	2.5
Earned income for project leavers	10%+ increase	<input type="text"/> %	<input type="text"/> out of	2.5
Non-employment income for project leavers	15%+ increase	<input type="text"/> %	<input type="text"/> out of	2.5
Performance Measures Subtotal			0	out of 50
SERVE HIGH NEED POPULATIONS				
Transitional Housing	≥ 50% of participants with zero income at entry	<input type="text"/> %	<input type="text"/> out of	5
Transitional Housing	≥ 50% of participants with more than one disability type	<input type="text"/> %	<input type="text"/> out of	5
Transitional Housing	≥ 50% of participants entering project from place not meant for human habitation	<input type="text"/> %	<input type="text"/> out of	5
Serve High Need Populations Subtotal			0	out of 15
PROJECT EFFECTIVENESS				
Coordinated Entry Participation	≥ 95% of entries to project from CE referrals	<input type="text"/> %	<input type="text"/> out of	5
Housing First and/or Low Barrier Implementation	Commits to applying Housing First model	<input type="text"/>	<input type="text"/> out of	10
Project Effectiveness Subtotal			0	out of 15
OTHER AND LOCAL CRITERIA				
CoC Monitoring Score	Project is operating in conformance to CoC standards	<input type="text"/>	<input type="text"/> out of	5
Returns to Homelessness 0-6		<input type="text"/>	<input type="text"/> out of	5
Returns to Homelessness 6-12 mo		<input type="text"/>	<input type="text"/> out of	5
Returns to Homelessness 12-24 mo		<input type="text"/>	<input type="text"/> out of	5
Alcohol, Drug Abuse, or both at entry		<input type="text"/>	<input type="text"/> out of	5
DV history at entry		<input type="text"/>	<input type="text"/> out of	5
Funding Returned		<input type="text"/>	<input type="text"/> out of	10

RENEWAL/EXPANSION PROJECT RATING TOOL

Project Name: _____
 Organization Name: _____
 Project Type: _____ TH _____
 Project Identifier: _____

RATING FACTOR	PERFORMANCE GOAL	PERFORMANCE	POINTS AWARDED	MAX POINT VALUE
	Other and Local Criteria Subtotal		0	out of 40
	TOTAL SCORE		0	out of 120
	Weighted Rating Score			out of 100

PROJECT FINANCIAL INFORMATION

CoC funding requested	<i>NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab</i>	\$ -
Amount of other public funding (federal, state, county, city)		-
Amount of private funding		-
TOTAL PROJECT COST		\$ -
CoC Amount Awarded Last Operating Year	<i>NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab</i>	\$ -
CoC Amount Expended Last Operating Year	<i>NOTE: Edit on the LIST OF PROJECTS TO BE REVIEWED tab</i>	\$ -
Percent of CoC funding expended last operating year		0%

**LOUISVILLE METRO COC
2018 APPLICATION
FINAL RANKING**

Project Name	Org	Type	Funding Req.	Cumm. Req.	Units	Pop
HMIS 1&2	CFH	HMIS	\$ 130,075	\$ 130,075	x	
HMIS 3 C/E	CFH	HMIS	\$ 79,502	\$ 209,577	x	
RX PSH	CFH	PSH	\$ 447,059	\$ 656,636	34	Fam/S
Common Assess 1	FHC/P	C/E	\$ 188,168	\$ 844,804	x	
Common Assess 2	FHC/P	C/E	\$ 111,488	\$ 956,292	x	
VOATH/RRH	VOA	TH/RRH	\$ 547,223	\$ 1,503,515	15/9	Fam
Prev/Div 1	CFH	C/E	\$ 110,187	\$ 1,613,702	x	
PSH 3	LMG	PSH	\$ 120,197	\$ 1,733,899	11	Fam/S
Journey House	Wellspring	PSH	\$ 240,718	\$ 1,974,617	18	S
PSHYA	CFH	PSH	\$ 200,036	\$ 2,174,653	17	Fam/S
SHCH	CFH	PSH	\$ 329,464	\$ 2,504,117	30	S
CHI	SVDP	PSH	\$ 505,258	\$ 3,009,375	46	Fam/S
CH2	CFH	PSH	\$ 695,609	\$ 3,704,984	61	S
PSHCH	CFH	PSH	\$ 507,229	\$ 4,212,213	47	S
Simon Hall	LMG	PSH	\$ 42,382	\$ 4,254,595	8	S
WCM Men	WCM	PSH	\$ 122,498	\$ 4,377,093	30	S
TBRA	LMG	PSH	\$ 2,037,501	\$ 6,414,594	230	Fam/S
LASH	CFH	PSH	\$ 633,487	\$ 7,048,081	46	Fam/S
DePaul Apt	LMG	PSH	\$ 103,396	\$ 7,151,477	10	Fam/S
WCM Women 2	WCM	PSH	\$ 93,614	\$ 7,245,091	10.15	S
Homes w/Heart	HoR	PSH	\$ 156,178	\$ 7,401,269	13	Fam/S
M-M/Baxter	Well	PSH	\$ 56,669	\$ 7,457,938	11	S
Homes w/Hope	SVDP	PSH	\$ 131,787	\$ 7,589,725	9	Fam/S
RRH HOTI	HOTI	RRH	\$ 438,290	\$ 8,028,015	30	Fam/S
SVDP Campus	SVDP	PSH	\$ 362,221	\$ 8,390,236	54	Fam/S
PSH	Choices	PSH	\$ 78,300	\$ 8,468,536	9	Fam/S
RRH Fam	VOA	RRH	\$ 114,442	\$ 8,582,978	7	Fam
RRH DV Lou Metro	LMG	RRH	\$ 54,319	\$ 8,637,297	4	Fam/S
NC2	LMG	PSH	\$ 199,474	\$ 8,836,771	12	Fam/S
NC1	LMG	PSH	\$ 159,882	\$ 8,996,653	10	Fam/S
Outreach	Cntrstn	SSO	\$ 94,825	\$ 9,091,478		
THYA	CFH	TH	\$ 230,605	\$ 9,322,083	21	Fam/S/Y
WCM Women	WCM	PSH	\$ 31,496	\$ 9,353,579	6	S
Kersey	LMG	PSH	\$ 32,961	\$ 9,386,540	4	S
TH/RRH	SA	TH/RRH	\$ 333,855	\$ 9,720,395	6/12	Fam
Prev/Div 2	CFH	C/E	\$ 112,539	\$ 9,832,934		

\$ 8,719,772 Tier 1 line

Tier Line

The NC2 project is on the funding line. 59% (\$116,999) of NC2 is in Tier 2

The Planning Grant is: \$278,291 It is not required to be ranked in the application.

The total amount of funding requested is: \$10,342,443

**Louisville Metro Continuum of Care
2018 Application
Final Ranking Explanation**


On Wednesday September 6, 2018 the Continuum of Care Board approved the attached ranking of projects for the 2018 HUD CoC Application. The following is an explanation of the ranking and what was taken into consideration as the Board deliberated and made this difficult choice.

- Annual Renewal Demand: \$9,276,353
- Bonus Amount: \$556,581
- DV Bonus Amount: \$830,535
- Tier 1 funding line (94% of ARD): \$8,719,772

- Important points to consider
 - Tier 1 funding is considered essentially secure. It makes no difference where in Tier 1 a project is ranked. Projects ranked at the bottom of Tier 1 are just as secure as the project ranked #1.
 - # of permanent housing slots that could be lost.
 - # of rapid rehousing slots that could be lost.
 - HUD gives points in the overall application for increasing rapid rehousing. Points are lost for rapid rehousing reduction.
 - Family slots are in short supply.
 - HUD expects CoCs to have operational HMIS and Coordinated Entry (including Prevention/Diversion and Common Assessment) projects.
 - The Louisville CoC does not have any low performing projects that need to give way to new projects.
 - When projects are placed on the funding line, the part in Tier 1 has a good chance of being funded while the part in Tier 2 is more at risk. HUD is likely to pick up the portion in Tier 2 if the overall application receives enough points.

- The Board was given 4 ranking scenarios each based on a scoring matrix that included how each project scored on specific outcomes and operational items.
- The Board chose this option because:
 - All Tier 2 projects are ranked as they scored.
 - All rapid rehousing projects are in Tier 1 - thus we will not show a loss of RRH slots in the 2019 application.
 - NC1 and NC2 are essentially the same grant. NC2 is placed first because it is the larger of the two grants. Less PSH slots are put at risk.
 - All new projects are funded with either the Bonus or DV-Bonus money. All are placed in Tier 2 with the exception of the Prevention/Diversion 1 project. They are also placed at the bottom of the ranking thus making renewals more likely to be funded than new projects. Prevention/Diversion 1 secures funding for the existing prevention/diversion program. Prevention/Diversion 2 is an expansion of existing services.

- Other information
 - The DV-Bonus RRH project is placed last so as to not displace any other project if it is not chosen for the DV-Bonus money.



Louisville/Jefferson Co. KY Continuum of Care
KY-501
1300 S. 4th. St. Suite 250
Louisville, KY 40208

Memo

To: CoC Membership
From: Mary Frances Schafer
Re: 2018 CoC Ranking
Date: September 11, 2018

Shortly after the 2018 CoC Ranking of Projects was sent out to the CoC community, an error was discovered in the HUD provided worksheet we used to determine the ranking. The error involved the Coalition for the Homeless' Transitional Housing for Homeless Youth (THYA) grant. The Home of the Innocents provides the case management for this grant.

Essentially what happened is that the information that was entered into the worksheet for THYA was not saved and therefore their score was not calculated correctly. Once we discovered this error, Erin entered the information in again and this time the information was included. This resulted in a higher score for THYA and moved the grant up two positions.

After talking to Rosemary Lockett, the president of the CoC Board, it was decided to poll the board again to determine the final ranking of the projects. The board decided to go with the new ranking, moving THYA up two positions thus moving Wayside PSH Women 1 and LMG/House of Ruth Kersey down one position each.

I am attaching the updated and final ranking that will be included in the 2018 CoC application.

Subject: Updated Ranking
Date: Tuesday, September 11, 2018 at 1:48:50 PM Eastern Daylight Time
From: Mary Frances Schafer
To: CoC Listserv, Aaron Weathers, Andrea Scott, Anne Lanham, Donna Trabue, Erin Rutherford, Gena Redmon, Gerry Gordon Brown, Giselle Danger-Mercaderes, Greg Conley, Heath Rico-Storey, Jennifer Clark, KiAndra Hilliard, Kim Frierson, Laura Albovias, Mark Bolton, Mary Frances Schafer, Michelle Neuhauser, Natalie Harris, Pat McKiernan, Rosemary Lockett, Shameka Parrish Wright, Stewart Pope, Ajeenah Sharif, Alisa Miller, Amy Kalber, Andy Patterson, Angela Renfro, Beth Yeager, Brandi Scott, Brandy Bernauer, Bridgette Johnson, Carey Addison, Catherine McGeeney, Chad Lego, Cindy Brown Kinlock, Collett, Melinda C., Cory Bledsoe, Donna Russow, Ed Wnorowski, Eric Long, Greer Hannan, J. Welding, Jamie Watts, Jan Sherrell, Jenn Pence, Jill Miller, Jocelyn Fetalver, Joe Hamilton, Joe Higdon, Johanna Wint, Judy Brendle, Katharine Dobbins, Kristie Adams, Lauderdale, Sharon, Laura Ward, Laurie Hardin, Leah Mullaney, Lisa Collins, Lisa Renz, Lisa Sutton, Liz Ferguson, Liza Smith, Marguerite Thomas, Maria Price, Mark Miller, Mark Stanton, Mary Luke Noonan, Matt Reed, Megan Augsburg, Melinda Breslin, Michael Crenshaw, Michele Wheatley, Mona Page, Nina Moseley, Nolan Nelson, Nora Inman, Peggy Prewitt, Randy Webber, Sarah Buckler, Sean Dunbar, Steve Williams, Sue Clayborn, Tamara Reif, Tangy Hunter, Tiffany Cole-Hall, Tonia L Nolden, Tony Cecil, Trish Eskridge, Will King

Attachments: Final Ranking memo.docx, Final Ranking.xlsx

Please see attached for the updated ranking and explanation.

--

Mary Frances Schafer
Director of Community Coordination
Coalition for the Homeless
1300 S. 4th St., Ste.250
Louisville, KY 40208
502-636-9550 ex 209
Fax: 502-636-9950
mfschafer@louhomeless.org
www.louhomeless.org
<https://www.facebook.com/LouHomeless>





September 13, 2018

FY18 CoC competition and final project ranking

The Louisville/Jefferson County Continuum of Care has finalized the below materials regarding the rating and review of projects for the FY18 CoC competition and the FY18 final project ranking. Please [contact Mary Frances Schafer](#) with any questions.

- [2018 NOFA Grading Criteria](#)
- [Final Ranking Explanation](#)
- [Final Ranking](#)
- [Rating and Review Process](#)

← [HUD Grants Louisville \\$3.45 Million to End Youth Homelessness](#)

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2018 NOFA Grading Criteria – HUD Scoring Guide

Data Point	Source	Calculation	High Score	CoC Average	Goal Score	Zero Score
PERFORMANCE MEASURES						
Length of Stay (TH, RRH only)	22b	Average LOS	10	6.09	TH 270 Days RRH 270 Days	TH 366 Days RRH 366 Days
Leavers to PH destination	23a	(Stayers + leavers to PH) / Participants	25	17.31	95%	75%
Change in earned income – stayers	19a1	Total with change / total stayers	2.5	0.6	10 % had increase	0% had increase
Change in non-employee income – stayers	19a1	Total with change / total stayers	2.5	1.52	15% had increase	0% had increase
Change in earned income – leavers	19a1	Total with change / total leavers	2.5	.95	10% had increase	0% had increase
Change in non-employee income – leavers	19a1	Total with change / total leavers	2.5	1.67	15% had increase	0% had increase
SERVE HIGH NEED POPULATIONS						
Had zero income at entry	16	Total / number of participants	5	1.76	50% at entry	25% at entry
2+ disabilities at entry	13a2	Total 2+ disabilities / number of adults	5	4.21	50% at entry	25% at entry
Came from place not meant for human habitation	15	Total / number of participants	5	1.57	50% at entry	25% at entry
PROJECT EFFECTIVENESS						
Is project a Coordinated Entry participant?	App		10	10	95% of entries to project from CE referrals	Less than 95% entries from CE
Does project follow housing first?	App		10	9.33	Commits to applying HF	Does not apply HF
OTHER AND LOCAL CRITERIA						
Project monitoring score / CoC Participation	CoC		5	5		
Return to homelessness 0-6 mo.	Custom	Returns in 0-180 days	5	3.93	15%	40%
Return to homelessness 6-12 mo.	Custom	Returns in 181-365 days	5	4.79	15%	40%
Return to homelessness 12-24 mo.	Custom	Returns in 366-730 days	5	4.58	15%	40%
Alcohol, drug abuse, or both at entry	13a1	Total Alcohol, Drug, and both / number of adults	5	2.98	50% at entry	25% at entry
DV History	14a	Total YES / number of adults	5	2.63	50% at entry	25% at entry
Funding Returned	App		10	7.41	0% Returned	25% Returned
Total RRH and TH			115	104.76		
Total PSH			105	96.76		
Total for all projects out of 100			100	76.58		

**Louisville Metro Continuum of Care
2018 Application
Final Ranking Explanation**

On Wednesday September 6, 2018 the Continuum of Care Board approved the attached ranking of projects for the 2018 HUD CoC Application. The following is an explanation of the ranking and what was taken into consideration as the Board deliberated and made this difficult choice.

- Annual Renewal Demand: \$9,276,353
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 - # of permanent housing slots that could be lost.
 - # of rapid rehousing slots that could be lost.
 - HUD gives points in the overall application for increasing rapid rehousing. Points are lost for rapid rehousing reduction.
 - Family slots are in short supply.
 - HUD expects CoCs to have operational HMIS and Coordinated Entry (including Prevention/Diversion and Common Assessment) projects.
 - The Louisville CoC does not have any low performing projects that need to give way to new projects.
 - When projects are placed on the funding line, the part in Tier 1 has a good chance of being funded while the part in Tier 2 is more at risk. HUD is likely to pick up the portion in Tier 2 if the overall application receives enough points.
- The Board was given 4 ranking scenarios each based on a scoring matrix that included how each project scored on specific outcomes and operational items.
- The Board chose this option because:
 - All Tier 2 projects are ranked as they scored.
 - All rapid rehousing projects are in Tier 1 - thus we will not show a loss of RRH slots in the 2019 application.
 - NC1 and NC2 are essentially the same grant. NC2 is placed first because it is the larger of the two grants. Less PSH slots are put at risk.
 - All new projects are funded with either the Bonus or DV-Bonus money. All are placed in Tier 2 with the exception of the Prevention/Diversion 1 project. They are also placed at the

LOUISVILLE METRO COC
2018 APPLICATION
FINAL RANKING

Project Name	Org	Type	Funding Req.	Cumm. Req.	Units	Pop
HMIS 1&2	CFH	HMIS	\$ 130,075	\$ 130,075	x	
HMIS 3 C/E	CFH	HMIS	\$ 79,502	\$ 209,577	x	
RX PSH	CFH	PSH	\$ 447,059	\$ 656,636	34	Fam/S
Common Assess 1	FHC/P	C/E	\$ 188,168	\$ 844,804	x	
Common Assess 2	FHC/P	C/E	\$ 111,488	\$ 956,292	x	
VOA TH/RRH	VOA	TH/RRH	\$ 547,223	\$ 1,503,515	15/9	Fam
Prev/Div 1	CFH	C/E	\$ 110,187	\$ 1,613,702	x	
PSH 3	LMG	PSH	\$ 120,197	\$ 1,733,899	11	Fam/S
Journey House	Wellspring	PSH	\$ 240,718	\$ 1,974,617	18	S
PSHYA	CFH	PSH	\$ 200,036	\$ 2,174,653	17	Fam/S
SHCH	CFH	PSH	\$ 329,464	\$ 2,504,117	30	S
CHI	SVDP	PSH	\$ 505,258	\$ 3,009,375	46	Fam/S
CH2	CFH	PSH	\$ 695,609	\$ 3,704,984	61	S
PSHCH	CFH	PSH	\$ 507,229	\$ 4,212,213	47	S
Simon Hall	LMG	PSH	\$ 42,382	\$ 4,254,595	8	S
WCM Men	WCM	PSH	\$ 122,498	\$ 4,377,093	30	S
TBRA	LMG	PSH	\$ 2,037,501	\$ 6,414,594	230	Fam/S
LASH	CFH	PSH	\$ 633,487	\$ 7,048,081	46	Fam/S
DePaul Apt	LMG	PSH	\$ 103,396	\$ 7,151,477	10	Fam/S
WCM Women 2	WCM	PSH	\$ 93,614	\$ 7,245,091	10.15	S
Homes w/Hearth	HoR	PSH	\$ 156,178	\$ 7,401,269	13	Fam/S
M-M/Baxter	Wel	PSH	\$ 56,669	\$ 7,457,938	11	S
Homes w/Hope	SVDP	PSH	\$ 131,787	\$ 7,589,725	9	Fam/S
RRH HOTI	HOTI	RRH	\$ 438,290	\$ 8,028,015	30	Fam/S
SVDP Campus	SVDP	PSH	\$ 362,221	\$ 8,390,236	54	Fam/S
PSH	Choices	PSH	\$ 78,300	\$ 8,468,536	9	Fam/S
RRH Fam	VOA	RRH	\$ 114,442	\$ 8,582,978	7	Fam
RRH DV Lou Metro	LMG	RRH	\$ 54,319	\$ 8,637,297	4	Fam/S
NC2	LMG	PSH	\$ 199,474	\$ 8,836,771	12	Fam/S
NC1	LMG	PSH	\$ 159,882	\$ 8,996,653	10	Fam/S
Outreach	Cntrstrn	SSO	\$ 94,825	\$ 9,091,478		
THYA	CFH	TH	\$ 230,605	\$ 9,322,083	21	Fam/S/Y
WCM Women	WCM	PSH	\$ 31,496	\$ 9,353,579	6	S
Kersey	LMG	PSH	\$ 32,961	\$ 9,386,540	4	S
TH/RRH	SA	TH/RRH	\$ 333,855	\$ 9,720,395	6/12	Fam
Prev/Div 2	CFH	C/E	\$ 112,539	\$ 9,832,934		
				\$ 8,719,772		Tier 1 line

Tier Line

The NC2 project is on the funding line. 59% (\$116,999) of NC2 is in Tier 2

LOUISVILLE CONTINUUM OF CARE RATING AND REVIEW PROCEDURE FY2018

On July 10, 2018 all CoC Members were notified of preliminary rating and review criteria. This notification gave all programs to opportunity to self-evaluate their performance and correct any data errors as needed by August 3, 2018

Upon release of the Optional Rating and Ranking Tool by HUD the Louisville CoC opted to use this tool as it incorporated most of preliminary measures given to the CoC as well as some additional criteria important to performance. The Louisville CoC also added some additional criteria to the HUD tool based on local need. The original Rating and Ranking tool is available here:
<https://www.hudexchange.info/resource/5292/project-rating-and-ranking-tool/>

In order to be considered for funding consideration all projects were required to submit the first draft of their application in eSnaps no later than August 18, 2018.

The review and ranking criteria assigned points based on positive housing outcomes by measuring exits to permanent housing. Five criteria were used to assess the severity of program participant needs. Points were awarded based on the percent of participants with zero income at entry, percent of participants with more than one disability type, percent of participants entering the project from a place not meant for human habitation, percent of participants reporting a substance abuse disorder at entry, and percent of participants reporting being a victim or domestic violence at entry.

The Louisville CoC did not receive any applications for projects from victim's service providers during the FY18 funding competition. If there had been any received, the CoC would have used data from a comparable database when available. If data was not available from a comparable database the victim service provider would have automatically received full points for that metric.

All CoC programs were notified of their project score on September 6, 2018 and given the opportunity to appeal any individual metrics or scores they felt were inaccurate.

The final project ranking was determined by the Continuum of Care Board of Directors. For more information on this see the 2018 Final Ranking Explanation.

RATING AND REVIEW CRITERIA

The following are the criteria used to rank programs, their source and calculation, and their possible scoring ranges. Unless otherwise noted, they were all taken from CoC APB reports run for the program



Subject: CoC Application

Date: Thursday, September 13, 2018 at 12:47:17 PM Eastern Daylight Time

From: Mary Frances Schafer

To: CoC Listserv, Aaron Weathers, Andrea Scott, Anne Lanham, Donna Trabue, Erin Rutherford, Gena Redmon, Gerry Gordon Brown, Giselle Danger-Mercaderes, Greg Conley, Heath Rico-Storey, Jennifer Clark, KiAndra Hilliard, Kim Frierson, Laura Albovias, Mark Bolton, Mary Frances Schafer, Michelle Neuhauser, Natalie Harris, Pat McKiernan, Rosemary Lockett, Shameka Parrish Wright, Stewart Pope, Ajeenah Sharif, Alisa Miller, Amy Kalber, Andy Patterson, Angela Renfro, Beth Yeager, Brandi Scott, Brandy Bernauer, Bridgette Johnson, Carey Addison, Catherine McGeeney, Chad Lego, Cindy Brown Kinlock, Collett, Melinda C., Cory Bledsoe, Donna Russow, Ed Wnorowski, Eric Long, Greer Hannan, J. Welding, Jamie Watts, Jan Sherrell, Jenn Pence, Jill Miller, Jocelyn Fetalver, Joe Hamilton, Joe Higdon, Johanna Wint, Judy Brendle, Katharine Dobbins, Kristie Adams, Lauderdale, Sharon, Laura Ward, Laurie Hardin, Leah Mullaney, Lisa Collins, Lisa Renz, Lisa Sutton, Liz Ferguson, Liza Smith, Marguerite Thomas, Maria Price, Mark Miller, Mark Stanton, Mary Luke Noonan, Matt Reed, Megan Augsburg, Melinda Breslin, Michael Crenshaw, Michele Wheatley, Mona Page, Nina Moseley, Nolan Nelson, Nora Inman, Peggy Prewitt, Randy Webber, Sarah Buckler, Sean Dunbar, Steve Williams, Sue Clayborn, Tamara Reif, Tangy Hunter, Tiffany Cole-Hall, Tonia L Nolden, Tony Cecil, Trish Eskridge, Will King, Beth Yeager

You should have received the final ranking and the scoring methodology earlier in the last 2 weeks. We are now letting you know that they are now publicly posted on the Coalition's website.

<http://louhomeless.org/fy18-coc-competition-and-final-project-ranking/>

--

Mary Frances Schafer
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LOUISVILLE/JEFFERSON COUNTY CONTINUUM OF CARE FY18 REALLOCATION PLAN

In the FY18 funding competition, the Louisville/Jefferson County Continuum of Care did use the reallocation process. However, this was done on a voluntary basis. It is the CoC's intention to examine all projects each year to determine if there are any that reallocation would be advisable. It is the CoC's choice to begin the process with a conversation with the agency on an individual basis to determine an agency's willingness to reallocate the funds. After these conversations the CoC determines the best way to move forward.

Projects are scored on the following items to determine inclusion and ranking. Returns to homelessness, increase in income, exits to permanent housing, number of chronically homeless that are served, HMIS data quality, amount of funding that has been recaptured, commitment to Housing First, length of stay in the project, the number of people accepted with zero income and the number of people accepted that have more than one disability.

Projects that score at the lower end of the list are examined for why they scored low, how critical the service is to the community, is there someone else who could provide the service better and is there another service that the community needs more. Discussions are had with the project, the CoC Advisory Group and ultimately the board to determine the best course of action. Reallocation is pursued when the community need dictates a change in services or provider agency. If the existing agency is unable or unwilling to provide the needed changes, the CoC Applicant informs the community of the availability of funds and the type of service the community needs.

The CoC has reallocated several projects in the past and at this time there are no projects that do not meet a high community need or poorly performing projects where a change is needed or financially prudent. 78% (26) of the projects are PSH or RRH, 9% (3) are Coordinated Entry, 6% (2) are HMIS, 3% (1) are TH/RRH and 3% (1) is transitional housing for young adults. The CoC's success rate for obtaining/maintaining PH was 92% in 2016 and 97% in 2017.

One project did opt to take advantage of the opportunity to shift from one project component to another component and has applied to transition from an HMIS grant held by the HMIS lead to a Coordinated Entry grant that will provide a single point of contact for services in the Louisville Metro Area.

In the FY18 funding completion the Louisville Continuum of Care did not receive proposals for more projects than funding available. As such, all proposed reallocations and new projects were approved.

Subject: Revised Notification of Project Applications approved for submission
Date: Thursday, August 30, 2018 at 10:20:21 AM Eastern Daylight Time
From: Mary Frances Schafer
To: Aaron Weathers, Andrea Scott, Anne Lanham, Donna Trabue, Erin Rutherford, Gena Redmon, Gerry Gordon Brown, Giselle Danger-Mercaderes, Greg Conley, Heath Rico-Storey, Jennifer Clark, KiAndra Hilliard, Kim Frierson, Laura Albovias, Mark Bolton, Mary Frances Schafer, Michelle Neuhauser, Natalie Harris, Pat McKiernan, Rosemary Lockett, Shameka Parrish Wright, Stewart Pope, CoC Listserv, Ajeenah Sharif, Alisa Miller, Amy Kalber, Andy Patterson, Angela Renfro, Beth Yeager, Brandi Scott, Brandy Bernauer, Bridgette Johnson, Carey Addison, Catherine McGeeney, Cindy Brown Kinlock, Collett, Melinda C., Cory Bledsoe, Donna Russow, Ed Wnorowski, Eric Long, Greer Hannan, J. Welding, Jamie Watts, Jan Sherrell, Jenn Pence, Jill Miller, Jocelyn Fetalver, Joe Hamilton, Joe Higdon, Johanna Wint, Judy Brendle, Katharine Dobbins, Kristie Adams, Lauderdale, Sharon, Laura Ward, Lauren Fenstemaker, Laurie Hardin, Leah Mullaney, Lisa Collins, Lisa Renz, Lisa Sutton, Liz Ferguson, Liza Smith, Marguerite Thomas, Maria Price, Mark Miller, Mark Stanton, Mary Luke Noonan, Matt Reed, Megan Augsburg, Melinda Breslin, Michael Crenshaw, Michele Wheatley, Mona Page, Nina Moseley, Nolan Nelson, Nora Inman, Peggy Prewitt, Randy Webber, Sarah Buckler, Sean Dunbar, Shannon Derrick, Steve Williams, Sue Clayborn, Tamara Reif, Tangy Hunter, Tiffany Cole-Hall, Tonia L Nolden, Tony Cecil, Trish Eskridge, Will King

Attachments: Notification of Inclusion Letter.docx

Attached you will find the notice that all Project Applications submitted for consideration in the 2018 CoC Application have been approved for submission. The letter I sent yesterday contained an error. Sorry

--

Mary Frances Schafer
Director of Community Coordination
Coalition for the Homeless
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mfschafer@louhomeless.org
www.louhomeless.org
<https://www.facebook.com/LouHomeless>



Louisville/Jefferson Co. KY Continuum of Care
 KY-501
 1300 S. 4th. St. Suite 250
 Louisville, KY 40208

Memo


To: All 2018 CoC Project Applicants
 From: Mary Frances Schafer, CoC Lead
 Date: August 30, 2018
 Re: Notice of Inclusion for CoC Project Applicants

Please be informed that all projects submitted for consideration in the 2018 Continuum of Care Application for HUD funding have been accepted and will be submitted under the KY-501 Louisville/Jefferson, Co. KY CoC.

Agency	Project
Centerstone of Kentucky	<ul style="list-style-type: none"> • Homeless Outreach Team (SSO/CE)
Choices, Inc.	<ul style="list-style-type: none"> • Permanent Supportive Housing
The Coalition for the Homeless, Inc.	<ul style="list-style-type: none"> • Louisville Metro Area HMIS • HMIS 2 Project • HMIS Consolidated Grant • Single Point of Entry Coordinated Entry • Coordinated Entry Diversion I - Bonus • Coordinated Entry Diversion II - Bonus • CoC Planning Grant • Collaborative Housing for the Chronically Homeless (CH2) (PSH) • Transitional Housing for Young Adults (THYA) • Louisville Alliance for Supportive Housing (LASH) (PSH) • PSH for the Chronically Homeless (PSHCH) • Permanent Supportive Housing for Youth & Adults (PSHYA) • Supportive Housing for the Chronically Homeless (SHCH) • Family Health Centers RX: Housing (PSH)
Family Health Center at Phoenix	<ul style="list-style-type: none"> • Common Assessment • Common Assessment II • FHC Common Assessment (Combined)
House of Ruth, Inc.	<ul style="list-style-type: none"> • Homes with Heart (PSH)
Home of the Innocents	<ul style="list-style-type: none"> • Rapid Re-housing
Louisville Metro Department of Community Services	<ul style="list-style-type: none"> • SPC Kersey Condo Permanent Supportive Housing • SPC Simon Hall Permanent Supportive Housing • SPC Louisville TBRA PSH • SPS DePaul Apts. Permanent Supportive Housing • Permanent Supportive Housing for Non Chronic #1 • Permanent Supportive Housing for Non Chronic #2 • Permanent Supportive Housing III CH • Rapid Rehousing for Victims of Domestic Violence
The Salvation Army Southern Territory Headquarters	<ul style="list-style-type: none"> • Joint Transitional Housing/Rapid Rehousing for Families - Bonus



Schizophrenia Foundation of Kentucky, Inc. (dba: Wellspring)	<ul style="list-style-type: none">• Journey House Permanent Supportive Housing• Sober Living I Murray/McKinney (PSH)• Sober Living II Baxter (PSH)• Murray/Baxter PSH (Combined)
The Society of St. Vincent de Paul	<ul style="list-style-type: none">• Collaborative Housing Initiative (CHI) (PSH)• SVDP On Campus PSH• Homes with Hope Permanent Supportive Housing
Volunteers of America of Kentucky, Inc.	<ul style="list-style-type: none">• Joint Component Project - Transitional Housing/Rapid Rehousing• CoC Rapid Rehousing for Families (RRH)• Rapid Rehousing for Victims of Domestic Violence - DV Bonus
Wayside Christian Mission	<ul style="list-style-type: none">• Men's Permanent Supportive Housing Program• Women's Permanent Supportive Housing Program• Women's Permanent Supportive Housing Program #2



Louisville/Jefferson Co. KY Continuum of Care
KY-501
1300 S. 4th. St. Suite 250
Louisville, KY 40208

No projects were rejected or reduced during the FY18 CoC Program funding competition.

One project chose not to submit a previously approved application for funding due to concerns about the matching requirement. Documentation of this communication from the project applicant to the CoC Lead is attached.

Subject: Fwd: DV Bonus Funds

Date: Monday, September 10, 2018 at 8:43:24 AM Eastern Daylight Time

From: Mary Frances Schafer

To: Brandi Scott

----- Forwarded message -----

From: **Andrea Walden** <AndreaW@voamid.org>

Date: Mon, Sep 10, 2018 at 7:46 AM

Subject: DV Bonus Funds

To: mfschafer@louhomeless.org <mfschafer@louhomeless.org>

Cc: Tamara Reif <TamaraR@voamid.org>, Jill Miller <JillM@voamid.org>, Jennifer Hancock <JenniferH@voamid.org>

Good morning, Mary Frances,

We wanted to let you know first thing this morning that we cannot move forward with an application for the DV RRH bonus funding. After running this through our formal program development process, and completing much additional research, validation, and consultation with our CFO and with Jennifer, we concluded that we cannot move forward without jeopardizing the financial stability and sustainability of our other housing programs. This goes back to our difficulty in meeting match requirements. Our first priority must be to continue to sustain the operations of the Family Emergency Shelter, which continuously operates at a deficit but that we feel an imperative to continue for the community, as well as the Family Stabilization grants we took over from Family and Children's Place in October.

This was not an easy decision to make, and the Coalition and CWF went above and beyond in trying to help us come up with additional validated match funds. Please let us know if you have any questions or if we can be of assistance in finding an alternate way of seeing that these funds are deployed to provide important assistance in the community.

Thank you,

Andrea

On Sep 7, 2018, at 9:24 AM, Mary Frances Schafer <mfschafer@louhomeless.org> wrote:

Attached you will find the Board approved final ranking and an explanation. These decisions are never easy but we feel this ranking has the best chance to have as many projects funded as possible, keep money in the community and, address the pressing needs of our homeless community. You may contact me if you have any questions.

The deadline for submission is quickly approaching. Thanks to all for your hard work on this massive project.

--

Mary Frances Schafer
Director of Community Coordination
Coalition for the Homeless
1300 S. 4th St., Ste.250
Louisville, KY 40208



July 9, 2018

Release of FY2018 Notice of Funding Availability

HUD has released the FY2018 Notice of Funding Availability for the Continuum of Care program. Applications are due to the Coalition for the Homeless on August 18, 2018. For more information see: <https://www.hudexchange.info/programs/e-snaps/fy-2018-coc-program-nofa-coc-program-competition/#nofa-and-notices>.

If your organization is interested in learning about potential funding opportunities under the 2018 NOFA, please contact Mary Frances Schafer by [email](#) or by phone at (502) 636-9550 x209. The COC welcomes proposals from organizations that have not previously received COC funding.

[HUD Grants Louisville \\$3.45 Million to End Youth Homelessness](#) →
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Coalition for the Homeless

July 10 · 🌐



HUD has released the FY2018 Notice of Funding Availability for the Continuum of Care program. Applications are due to the Coalition for the Homeless on August 18, 2018. For more information, see:

<https://www.hudexchange.info/.../fy-2018-coc-program-nofa-c.../....>

If your organization is interested in learning about potential funding opportunities under the 2018 NOFA, please contact Mary Frances Schafer by email at mfschafer@louhomeless.org or by phone at (502) 636-9550 x209. The COC welcomes proposals from organizations that have not previously received COC funding.

HUD RELEASED NOTICE OF FUNDING AVAILABILITY

Melissa Raley Kratzer and 5 others

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----- Forwarded message -----

From: **Catherine McGeeny** <cmcgeeny@louhomeless.org>

Date: Mon, Jul 30, 2018 at 3:06 PM

Subject: Coalition enews: \$3.45m to end youth homelessness, upcoming events, more!

No Images? [Click here](#)



*This is the [Coalition for the Homeless](#) enewsletter.
Thanks for your interest and support!*



We're thrilled to announce that **Louisville has won a \$3.45 million HUD grant to**

end youth homelessness in Louisville!

The [Homeless Youth Demonstration Grant](#) allows communities to create comprehensive and innovative plans to address homelessness for unaccompanied youth age 24 and under.

We are so grateful for our Homeless Youth Committee, Youth Action Board (comprised of youth who have experienced homelessness), and over 70 partners who have been working hard for the young adults for decades—with a renewed, collaborative focus over the past year.

The youth of this community are our future, and we are elated that we will be able to empower and serve them so much better with this grant. Stay tuned for details regarding our plan and how you can help. 🗝️ 🏠 🎉



Are you a young professional interested in joining our efforts to end homelessness in Louisville?

Our Associate Board is currently accepting applications! We are seeking out individuals with marketing experience in particular, but all engaged and compassionate young adults are encouraged to apply.

[Click here](#) to see the list of current members and to [download an application](#).

* 2018 Bourbon Mixer



THE HENRY CLAY
AUGUST 25, 2018 | 6:30 - 10:30PM
PROCEEDS BENEFIT COALITION FOR THE HOMELESS

Purchase tickets at BourbonMixer.com

Do you love bourbon and mid-century modern styles? Then you're in luck: the fifth annual **Bourbon Mixer** will be held on August 25th from 6:30pm-10:30pm at the Henry Clay with a special mid-century modern theme!

Today's the day to [buy tickets](#): they are discounted to \$100 (from \$125) only for the month of July.

This event supports the Coalition for the Homeless and will feature bourbon from 21 distilleries with upscale cuisine in a spirited atmosphere. For tickets or more details, [click here](#).

HUD has released the [FY2018 Notice of Funding Availability](#) for the Continuum of Care program. Applications are due to the Coalition on August 18, 2018.

If your organization is interested in learning about potential funding opportunities under the 2018 NOFA, please contact Mary Frances Schafer [by email](#) or by phone at (502) 636-9550 x 209.

The COC welcomes proposals from organizations that have not previously received COC funding.

UPCOMING EVENTS

Saturday, 8/18: Good News Party at Fern Creek United Methodist Church

Saturday, 8/25: [Bourbon Mixer](#) benefiting the Coalition

Wednesday, 10/3: Stand Down, one-day resource fair for the homeless

Thursday, 10/11: [Craft Beer Throwdown](#)

Make A Gift!

About Us

The Coalition for the Homeless's mission is to prevent and end homelessness in Louisville through advocacy, education, and the coordination of our 31 member agencies. We have been the lead advocate for Louisville's homeless since 1986, when we were founded after several people died on Louisville's streets.

Please stay connected:

- Learn more at our website: louhomeless.org
- Like us on Facebook: facebook.com/louhomeless
- Follow us on Twitter: twitter.com/louhomeless
- Follow us on LinkedIn: linkedin.com/company/821408
- Follow us on Instagram: instagram.com/coalitionforhomeless
- Make a donation: louhomeless.org/donate

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GOVERNANCE CHARTER
KY-501 LOUISVILLE/JEFFERSON, CO. KY CONTINUUM OF CARE
(INCLUDING CoC-HMIS GOVERNANCE AGREEMENT)
November 13, 2013 (Updated: Oct. 2015, July 2017, Aug. 2018)

ARTICLE I - NAME, CORE VALUES, PURPOSE, GOALS AND RESPONSIBILITIES

A. Name

The name of this unincorporated association is Louisville/Jefferson, Co. KY Continuum of Care (hereinafter referred to as the CoC, Louisville Metro CoC or Continuum).

B. Geographic Area

The Louisville Metro CoC geographic area is defined as Louisville Metro with the six-digit code of 211374. This area includes all of Jefferson County, KY.

C. Core Values

- We value programs with outcomes that demonstrate progress toward reducing and ending homelessness as quickly as possible with an ultimate goal of no more than 30 days.
- We value innovative and diverse programming that addresses gaps in community services.
- We value quality programming that is accountable to the community through outcomes measurement.
- We value the effort to access the maximum amount of funding available to the Louisville Metro area.
- We value the commitment to serve all people who are in need of assistance regardless of race, gender, age, national origin, sexual orientation, gender identity and class and to be in compliance with all applicable laws regarding program accessibility for all people.
- We value and respect the decisions and choices of those who find themselves homeless and seek to optimize self-sufficiency.

D. Purpose

The purpose of the Louisville Metro CoC: promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effective utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

E. Louisville Metro CoC Goals

The goals of the Louisville Metro CoC are fully stated in the “Blueprint to End Homelessness” (Louisville Plan to End Homelessness) and include the following goals that directly tie to the goals of the HEARTH Act and the Louisville Metro Consolidated Plan.

- Increase Leadership, Collaboration and Civic Engagement
- Increase Access to Stable and Affordable Housing
- Increase Economic Security
- Increase Health and Stability

GOVERNANCE CHARTER

- Retool Crisis Response

F. Responsibilities

The Continuum will fulfill the responsibilities of Continuums of Care as set forth by HUD under Title 24, Part 578 of the Code of Federal Regulations including to:

- Operate the Continuum of Care
- Designate and operate an HMIS
- Plan for the CoC

Although the Continuum may delegate certain of its responsibilities to others such as the Collaborative Applicant, it remains responsible for its responsibilities set forth by HUD.

ARTICLE II - CONTINUUM OF CARE MEMBERS

A. Eligibility for Membership

Agencies who serve the homeless population, agencies who serve those who are at risk of homelessness, governmental departments charged with addressing homelessness, individuals who are interested in addressing the issue of homelessness in the Louisville Metro area and other relevant organizations within the CoC's geographic area are eligible for membership in the Continuum of Care. "Relevant organizations" 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, organizations that serve veterans and homeless and formerly homeless individuals.

Procedure to Become a Member

CoC meetings are open to all who care to attend; however, requirements for voting are set forth below in Article II (F)(2); a Membership Packet must be completed.

B. Term and Renewal of Membership

All members must formally renew their membership annually, which includes completion of required forms relating to attendance, voting rights, etc. at the beginning of the Continuum year (July).

C. Invitation for New Members

At least once per year, the COC will make an invitation for new members to join publicly available within the geographic area.

D. Responsibilities of Members

a. The full membership body is responsible for:

- Designating the Collaborative Applicant entity that is to write the application for funding in response to HUD's annual CoC Program NOFA for homeless assistance resources;
- Designating the HMIS lead
- Electing new CoC Board Members;
- Providing information and advice to the CoC Board regarding best practices in homeless services;

GOVERNANCE CHARTER

- 1 • Developing a plan that includes coordinating the implementation of a housing and services
2 system that meets the needs of the homeless population (encompassing outreach,
3 engagement, assessment, shelter, prevention strategies, etc.)
- 4 • Conducting a Point-in-Time count of homeless persons, at least biennially, in compliance
5 with regulation 24 CFR 578.7(c)(2);
- 6 • Conducting an annual gaps analysis of the homeless needs and services available within the
7 geographic area;
- 8 • Providing information required to complete the Consolidated Plan;
- 9 • Consulting with State and local government ESG program recipients on the plan for
10 allocating ESG program funds and reporting on and evaluating the performance of ESG
11 program recipients and sub-recipients;
- 12 • Striving to provide the best services to each of the community's specific homeless
13 populations;
- 14 • Establishing and providing oversight of the monitoring standards for agencies providing
15 services and designating appropriate oversight agencies;
- 16 • Working within the CoC homeless provider system to provide comprehensive and
17 appropriate services to move homeless persons as quickly and appropriately as possible;
- 18 • Participating on CoC Committees and in monthly full membership meetings;
- 19 • Adopting and following a written process to select a board to act on behalf of the
20 Continuum of Care. The Process must be reviewed, updated and approved by the
21 Continuum at least once every 5 years;
- 22 • In consultation with the Collaborative Applicant and the HMIS lead, developing, following
23 and updating annually a governance charter, which will include all procedures and policies
24 needed to comply with subpart B of 24 CFR Part 578 (HUD regulation on CoC Program) and
25 with HMIS requirements as prescribed by HUD and a code of conduct and recusal process
26 for the Board, its chair(s) and any person acting on behalf of the Board;
- 27 • Evaluating and reporting to HUD outcomes of ESG and CoC projects and consulting with ESG
28 and CoC applicants regarding allocations;
- 29 • Establishing and providing oversight of a coordinated assessment system and single point of
30 entry and designating a lead for each, in compliance with regulation 24 CFR 578.7(a)(8);
- 31 • Consulting with recipients of ESG funds to establish and oversee compliance with written
32 standards for providing CoC assistance, which must include policies and procedures for
33 evaluating individuals and families' eligibility for assistance; for determining and prioritizing
34 which eligible individuals and families will receive transitional housing; for determining and
35 prioritizing which eligible individuals and families will receive rapid rehousing assistance
36 (including % or amount of rent required); for determining and prioritizing which eligible
37 individuals and families will receive permanent supportive housing assistance; for high
38 performing communities, if applicable.
- 39
- 40 2) Other responsibilities of member agencies include:
 - 41 • Demonstrating the ability and willingness to work with others in the community by
42 collaborating with agencies to provide services;

GOVERNANCE CHARTER

- 1 • Providing documentation of homelessness and other required information to other member
- 2 agencies in order to facilitate a seamless provision of care, in compliance with each agency's
- 3 Privacy Policy;
- 4 • Fully participating in the Louisville Metro Homeless Management Information System
- 5 (HMIS).
- 6

7 E. Rights of Members

8 1) Funding Proposals

9 Members have the right to submit new and renewal proposals within the guidelines and
10 specifications of the U.S. Dept. of Housing and Urban Development.

11 12 2) Voting Rights

13 The CoC community is the ultimate decision-making body for the Louisville Metro CoC. The
14 community itself holds the responsibility of deciding the needs of the community, how the
15 process is to be administered, endorsing the projects to be submitted for funding consideration
16 and the community priority ranking.

17 a) Agency Member

- 18 i) Holds one vote;
- 19 ii) Designates a delegate and an alternate at the beginning of the Continuum year
- 20 (July), who are authorized to cast the agency vote when such action is needed;
- 21 iii) Is allowed to send more than these designated people to the CoC meetings but
- 22 when a vote is taken, only the delegate or alternate is eligible to cast a vote;
- 23 iv) Is required to send a representative to at least 10 out of the last 12 CoC meetings
- 24 prior to the vote in order to be eligible to cast any vote including projects to be
- 25 submitted in the HUD CoC application or the election and approval of CoC Board
- 26 Members;
- 27 v) If an agency is unable to send either the delegate or alternate, that agency may send
- 28 a representative to the meeting and receive credit for attendance. However, only a
- 29 delegate or alternate has the right to vote on an issue, unless this person is
- 30 approved by the CoC coordinator in advance of the meeting;
- 31 vi) Is not eligible to vote on any issue regarding a project where that agency has a
- 32 financial interest or serves the project's agency in any capacity.

33 b) Individual Member

- 34 i) Holds one vote;
- 35 ii) Is required to attend at least 10 out of the last 12 community meetings prior to the
- 36 vote in order to be eligible to cast any vote including projects to be submitted in the
- 37 HUD CoC application or the election and approval of CoC Board Members;
- 38 iii) Is not eligible to vote on any issue regarding a project where that individual has a
- 39 financial interest.
- 40 iv) No individual member may vote if he or she is an employee of a member agency or
- 41 serving on the Board of a member agency.
- 42

43 F. Responsibilities of the Delegate and Alternate

44 Each member entity of the Louisville Metro CoC full membership designates a delegate and
45 alternate at the beginning of the Continuum year (July). Their responsibilities include:

GOVERNANCE CHARTER

- 1 • Attending ten (10) out of the previous twelve (12) CoC community meetings. This facilitates
- 2 a fully informed membership at the time of voting.
- 3 • Sharing information with agency directors and staff;
- 4 • Representing the interests of their member agency while considering the needs of the
- 5 community as a whole;
- 6 • Determining the projects that are sent to HUD Washington for funding consideration;
- 7 • Attending mandatory meetings, as notified by CoC Coordinator.

8 9 G. Regular Meetings

10 Meetings of the full membership, with published agendas shall take place monthly at such

11 times and places as designated in the notice for the meeting.

12 13 H. Notice of Meetings

14 The CoC Coordinator will schedule meetings and ensure that each agency/member has

15 sufficient notice.

16 17 I. Quorum

18 A majority of voting members constitutes a quorum.

19 20 J. Manner of Action and Voting Procedure

21 Matters will be decided by a majority of eligible voting members, present and voting, at a

22 meeting at which a quorum is present, except:

- 23 1) All eligible voting members shall have the opportunity to cast a vote regarding funding
- 24 decisions and Board elections. Ballots may be cast at a CoC meeting; however, absent
- 25 eligible voting members shall have the opportunity to cast their vote through other means
- 26 (email, U.S. Postal Service, FAX) as long as each completed ballot is:
 - 27 a. Designated for an eligible voting agency/member;
 - 28 b. The ballot contains the signature of the CoC delegate/alternate or individual member;
 - 29 and
 - 30 c. In compliance with any other requirements, such as being received by a specific date.
 - 31 d. The Board may authorize membership voting outside of a meeting, through other
 - 32 means (email, U.S. Postal Service, FAX) as needed.

33 K. Minutes

34 Minutes shall be taken of all membership meetings recording attendance and any votes taken.

35 36 37 ARTICLE III - BOARD OF DIRECTORS

38 A. General Powers

39 The Board shall have the authority to act on behalf of the Continuum.

40 41 B. Responsibilities

42 The Board shall:

- 43 a. Design, operate and follow a collaborative process for developing the application
- 44 and approving its submission;
- 45 b. Establish priorities for funding projects in the CoC geographic area;

GOVERNANCE CHARTER

- 1 c. Review the monitoring of all providers and determine appropriate action when
- 2 benchmarks are not met;
- 3 d. Provide a vision, priorities and goals for the CoC community;
- 4 e. Establish a process for funding recommendations through HUD and other funding
- 5 streams available in the community and insure that all discussion on review and
- 6 ranking procedures are reflected in the minutes and posted for community review;
- 7 f. Oversee progress of HMIS entry, common assessment and single point of entry and
- 8 make recommendations for improvement;
- 9 g. Review HMIS policies and procedures and update annually to insure compliance
- 10 with HUD. This includes a review of the security, data quality and privacy
- 11 procedures.
- 12 h. Establish and provide oversight of the HMIS system and designating an HMIS
- 13 administrator;
- 14 i. Determine eligibility, approve and rank projects to be included in the community
- 15 CoC and insure that all discussion on review and ranking procedures are reflected in
- 16 the minutes. Ranking is posted for community review;
- 17 j. Consult recipients and sub-recipients to establish performance targets appropriate
- 18 for population and program type, monitoring the performance of recipients and sub-
- 19 recipients, evaluating outcomes, and taking action against poor performers;
- 20 k. Provide recommendations for potential Board members especially as they relate to
- 21 representation of specific subpopulations.
- 22 l. Carry out such other duties, tasks and responsibilities as delegated by the
- 23 membership
- 24

25 C. Board Composition

26 The Louisville Metro CoC Board is made up of no less than 15 and no more than 21 voting
27 members and will include:

- 28 a. Board members elected by the CoC membership from the CoC membership or larger
- 29 community. The elected members must:
 - 30 i. Include at least one homeless or formerly homeless individual
- 31 b. Represent the relevant organizations and projects serving homeless subpopulations
- 32 including:
 - 33 i. Persons with substance use disorders,
 - 34 ii. Persons with HIV/AIDs,
 - 35 iii. Veterans,
 - 36 iv. The chronically homeless,
 - 37 v. Families with children,
 - 38 vi. Unaccompanied youth,
 - 39 vii. The seriously mentally ill,
 - 40 viii. Victims of domestic violence, dating violence, sexual assault and stalking
- 41 c. Include a member
 - 42 i. representing the Emergency Solutions Grants program (ESG) recipient's
 - 43 agency
 - 44 ii. representing the Veterans Administration

GOVERNANCE CHARTER

- 1 iii. representing the state (Kentucky Housing Corporation)
- 2 iv. representing Louisville Metro Gov't (ESG recipient)
- 3 v. representing the Youth Action Board (YAB)
- 4 d. It should always have an odd number of members;
- 5 e. A representative of the Collaborative Applicant will attend all board meetings and
- 6 may participate in discussions, but is not considered a member of the board
- 7 and holds no vote.
- 8

9 D. Term of Office

- 10 a. Board Members:
- 11 b. Shall serve three-year staggered terms;
- 12 c. Can serve an unlimited amount of terms. After each three year term the member
- 13 and the CoC community have the opportunity to discontinue the member's service.
- 14

15 E. Limitations

- 16 a. Only one person per agency may serve on the Board at any given time;
- 17 b. Agencies represented on the Board can have a proposal on the table as a recipient
- 18 or sub recipient, although they cannot vote on the proposal nor participate in
- 19 ranking discussions where/when implications to their agency is consequential.
- 20 c. If a board member cannot be present, that member may send a representative to a
- 21 meeting as a note taker but that person may not vote or participate in discussions
- 22 unless specifically asked by another board member and agreed to by a majority of
- 23 the members present. The presence of the representative does not constitute the
- 24 presence of the board member, ie. The board member is not considered in
- 25 attendance.
- 26 d. Must adhere to the Conflict of Interest policy as set forth below in Article IX of this
- 27 document
- 28

29 F. Election Process

30 Elections will be held each year for one-third of the Board. The Board or its Nominating
31 Committee will solicit nominations for vacant seats from the full membership and present the
32 slate to the Board for approval. The Board will screen and select nominees in accordance with
33 the requirements of the CoC Governance Charter. The prospective CoC Board members will
34 then be presented to the CoC members for approval. Each recommended member for the CoC
35 Board must be approved by the majority of the CoC membership in order to be appointed.
36 Voting shall be carried out in accordance with Article II (J), Manner of Action and Voting
37 Procedure.

38 G. Vacancies

39 Any vacancies in the Board shall be filled for the remainder of the term using the same election
40 process as referenced above.

41 H. Board Meetings

- 42
- 43 1) The CoC Board shall meet at least quarterly.
- 44

GOVERNANCE CHARTER

- 1 2) The date, place and time of each meeting shall be set by the Chair or other officer acting on
2 behalf of the Chair.
 - 3 3) All meetings shall be open to the public. The Board members may, however, by a simple
4 majority vote of those Board members present, a quorum being present, vote to hold a
5 meeting or portion thereof in executive session. Notice shall be given in a regular open
6 meeting of the general nature of the business to be discussed in closed session and the
7 reason for the closed session. No final action may be taken at a closed meeting. No
8 matters may be discussed at a closed meeting other than those publicly announced prior to
9 convening the closed meeting.
 - 10 4) Special meetings may be called by the Chair or upon request of three (3) Board members.
 - 11 5) Notice of all meetings shall be mailed or emailed to Board members not less than five (5)
12 nor more than thirty (30) days prior to the day of the meeting.
- 13
- 14 I. Quorum and Manner of Acting
 - 15 1) A majority of the Board shall constitute a quorum for the transaction of business at any
16 meeting of the Board. Matters shall be decided by majority vote of board members,
17 present and voting, at a meeting at which a quorum is present.
 - 18 2) Voting outside a meeting shall be rare and constitute an emergency situation. Further, an
19 outside vote may not occur unless all members have sufficient knowledge about the issue
20 and the ramifications of the vote. Said voting may occur by U.S. mail or email to properly
21 document each member's vote. Matters shall be decided by majority vote of the
22 respondents.
- 23
- 24 J. Removal
 - 25 A Board member may be removed by majority vote of the Board.
- 26

ARTICLE IV - OFFICERS

- 27
- 28
- 29 A. Officers
 - 30 The officers of the CoC shall be a Chair and Secretary. The Board may elect or appoint such
31 other officers including a Co-Chair and Assistant Secretary as it deems necessary or convenient.
32 Such officers shall have the authority and perform the duties assigned by the Board.
- 33
- 34 B. Chair
 - 35 The Chair of the Board shall:
 - 36 a. preside over all meetings of the Board and membership;
 - 37 b. plan, in consultation with the other officers, the agenda for all Board and
38 membership meetings;
 - 39 c. carry out all other duties incident to the office of Chair or prescribed by the Board.
- 40
- 41 C. Secretary
 - 42 The Secretary of the Board shall:
 - 43 a. keep minutes of all Board meetings, recording all votes taken;
 - 44 b. ensure that proper notice is given for all meetings;
 - 45 c. keep a list of the name and address of each member

GOVERNANCE CHARTER

d. carry out all other duties incident to the office of Secretary or prescribed by the Board.

D. Election and Term of Office

The officers shall be elected by and from the Board at its first meeting following the annual Board election and shall take office at that meeting. Election shall be by a simple majority vote of the Board members present, a quorum being present, and may be by a show of hands or secret ballot as the Board may choose. All officers shall serve a three-year term of office and may serve consecutive terms.

E. Vacancies

Vacancies in any office shall be filled for the remainder of the term of office by majority vote of the Board at a Board meeting.

F. Resignation

An officer may resign at any time by delivering a written resignation to the Chair or the Secretary in the event of the resignation of the Chair.

G. Removal

Any officer elected or appointed by the Board may be removed from office by majority vote of the Board whenever in its judgment the best interests of the CoC would be served thereby.

ARTICLE V - COMMITTEES

A. Louisville Metro CoC Committees

The Louisville Metro CoC Full Membership may see fit to create new committees to conduct the work of the Louisville Metro CoC at any time. At this time, the following CoC Committees have been established:

1. Institutional Discharge/ Homeless Prevention

The Institutional Discharge Committee meets quarterly to discuss ways to improve the discharge planning from state and local institutions including prisons, jails, mental hospitals and institutions, hospitals and foster care. The committee is open to all and includes representatives of these institutions as well as staff who participate in the homeless prevention program which serves those exiting state institutions.

2. Consumer Participation

The Consumer Participation Task Force meets bi-monthly to seek input from clients of homeless services. The committee is open to anyone but includes four volunteers representing ESG and CoC funded projects and two persons with no conflict of interest. Information is gathered from forums held over the course of the year and annually at the Project Connect/Stand Down where all people who are experiencing homelessness are invited to receive services at a one stop shop offered over the course of a full day.

3. Accessing Mainstream Benefits

The Accessing Mainstream Benefits Committee meets monthly to identify and examine services within the mainstream that assist with issues faced by those who are homeless.

GOVERNANCE CHARTER

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4. Coalition Supporting Young Adults

This committee is made up of agencies that serve 16-24 year olds in crisis without support throughout the city. Its role is to make recommendations to lower the number of young adults in crisis and prevent the cycle of homelessness in the next generation.

5. Coordinated Entry Steering Committee

The Coordinated Entry Steering Committee meets as needed to create and oversee the Louisville Metro CoC Coordinated Entry. The Steering Committee assists the Coordinated Entry project to provide and coordinate appropriate services to those seeking prevention, diversion, shelter and permanent housing.

6. Homeless Youth Committee

The Homeless Youth Committee seeks to create partnerships between agencies, projects, civic groups, government agencies, private entities and individuals interested in addressing the needs of homeless youth. These partnerships identify new ways of working together to break down barriers faced by homeless youth.

7. Youth Action Board

The Youth Action Board is made up of youth age 18 – 26 where the majority of members are homeless or formerly homeless. It is charged with assisting the CoC and the Homeless Youth Committee in addressing issues faced by homeless youth. The Board also takes on specific projects that would help homeless youth navigate the homeless provider system.

8. Rapid Rehousing Providers Committee

This group works together to exchange ideas and processes in order to better serve the people Rapid Rehousing serves.

9. HMIS User Group

The HMIS User Group meets quarterly before the full membership meeting to discuss changes and issues with the Louisville Metro CoC HMIS system. The committee is open to all but is made up primarily of those who enter HMIS data at each of the homeless service agencies.

10. The Mayor’s Homeless Encampment Task Force By-Name Subcommittee

This committee works with a by-name list to house people living on the streets as quickly as possible. This is done through case conferencing involving outreach teams, day center, Healthcare for the Homeless, agencies receiving CABHI funds and The Coalition for the Homeless.

11. Move Up Committee

The Move Up Committee solicits and reviews applications for move up Section 8 vouchers provided by the Louisville Metro Housing Authority. After review, the committee chooses the applicants for the vouchers and informs the appropriate case manager. It also monitors when vouchers become available and solicits more vouchers from Louisville Metro Housing Authority.

GOVERNANCE CHARTER

ARTICLE VI - DESIGNATION OF COLLABORATIVE APPLICANT AND HMIS LEAD

As required by HUD, the CoC will designate a Collaborative Applicant and an HMIS Lead and will set forth the responsibilities of such agents in the policies and procedures that are incorporated into this Charter as an appendix.

The CoC has designated The Coalition for the Homeless as the Collaborative Applicant and to serve as the CoC Lead.

ARTICLE VII – RESPONSIBILITIES OF THE COLLABORATIVE APPLICANT

The CoC has designated The Coalition for the Homeless as the Collaborative Applicant.

It is the role of the Collaborative Applicant to:

- a. Complete the electronic application in response to HUD’s annual CoC Program NOFA for homeless assistance resources,
- b. Present a timeline and deadlines to all project applicants for individual project plans,
- c. Collect all data and submit a renewal chart to HUD of all projects planning to reapply,
- d. Create the housing inventory chart,
- e. Create the grant inventory worksheet,
- f. Establish priorities for funding projects in the CoC geographic area,
- g. Lead process for ranking applications with guidance of CoC full membership,
- h. Monitor outcomes of CoC and ESG recipients,
- i. Oversee committees and volunteers,
- j. Create agendas for CoC full membership and Board meetings in collaboration with the Board Chair,
- k. Notify others that they can join the CoC full membership annually, and
- l. Monitor who is eligible to vote on the full membership.

ARTICLE VIII - RESPONSIBILITIES OF THE HMIS LEAD

The CoC has designated The Coalition for the Homeless as the HMIS Lead.

The CoC HMIS administrator is responsible for:

- a. Maintaining compliance with the latest HMIS Data and Technical standards published by HUD,
- b. Accurately calculating the size and needs of the homeless population,
- c. Tracking service and demand for homeless programs and understanding where improvements need to be made,
- d. Overseeing the reporting process for the CoC,
- e. Training agencies on accurate HMIS entry,
- f. Reviewing the licenses of member agencies each year to determine which have been unused and recapture a needed, and
- g. Coordinating a single point of entry to insure new clients are eligible for services and entered correctly.

GOVERNANCE CHARTER

- 1 h. Reporting as necessary to various entities such as Louisville Metro Government, the
- 2 Kentucky Housing Corporation, the U.S. Department of Housing and Urban
- 3 Development, etc.
- 4

ARTICLE IX - CODE OF CONDUCT

7 The CoC submits a Code of Conduct annually through the CoC application; it is ratified by and
8 applicable to all members. It includes:

10 A. Conflict of Interest

11 HUD regulation: No Board member may participate in or influence discussions or resulting
12 decisions concerning the award of a grant or other financial benefits to the organization that
13 the member represents. In these cases, the member with a conflict, must recuse themselves
14 from participation in conversation as well as voting.

16 As stated in Article III, E of this document:

- 17 a. Agencies represented on the Board can have a proposal on the table as a recipient
- 18 or sub recipient, although they cannot vote on the proposal nor participate in
- 19 ranking discussions where/when implications to their agency is consequential.
- 20

21 All members of the CoC Board are required to sign a conflict of interest form stating their
22 association with agencies and projects that can reasonably be expected to apply for and/or
23 receive funding through the CoC process. All associations will be made public to the full
24 membership prior to any process that will determine funding recipients. Members with a
25 conflict of interest are expected to recuse themselves from discussions and decisions where
26 there is a real or perceived conflict of interest.

28 B. Confidentiality

29 Information contained in the ESG and CoC applications and reports is considered proprietary
30 and confidential and may not be released to any person or party without approval of that
31 applicant agency.

32 Any client information shared within the CoC is also confidential and should not be released to
33 any other entity without a release of information signed by the client.

ARTICLE X - GRIEVANCES

37 All members of the Louisville Metro CoC full membership are encouraged to report any
38 grievances with the Louisville Metro CoC or CoC Board through this procedure without fear of
39 reprisal. Grievances should be submitted as soon as possible to ensure a proper response.

- 41 • CoC members should submit their grievance in writing or in person to the CoC Lead and try
- 42 to resolve the problem at that level.
- 43 • If the member is dissatisfied with the outcome or decision, they should submit a written
- 44 request to present their grievance at the next scheduled CoC Board meeting. The CoC
- 45 Board will give their response/decision in writing within 7 working days of receiving the
- 46 grievance.
- 47

GOVERNANCE CHARTER

1 All members have the right to file a grievance with the U.S. Department of Housing and Urban
2 Development (HUD). Members are encouraged to use the grievance process outlined above
3 first.
4

ARTICLE XI - AMENDMENT AND REVIEW

5
6
7 A. Amendment

8 The Governance charter may be amended by majority vote of the Board the proposed
9 amendment(s) have been submitted in writing to the Board at least ten (10) business days in
10 advance of the meeting.
11

12 The Board may waive the ten (10) day notification with a majority vote.
13

14 B. Regular Review

15 In consultation with the Collaborative Applicant and the HMIS Lead, the Board will review and
16 update the governance charter annually.
17

18 The CoC membership will review, update and approve the Board selection process at least
19 every five (5) years.
20

21 C. APPENDICES

22 Louisville Metro CoC procedures and policies created to comply with 24 CFR 578 Subpart B and
23 Kentucky HMIS policies and procedures created to comply with HMIS requirements as
24 prescribed by HUD.
25
26
27
28
29

30
31 President of the Board: Rosemary Luckett
32

33
34 President of the Board Signature: Rosemary Luckett
35
36

37
38 Date: 9/7/18

KYHMIS

Statewide Policy Manual

Kentucky Housing Corporation/Louisville Continuum of Care
August 2018

Please note, violation of the Kentucky Homeless Management Information System (KYHMIS) Participation Agreement and KYHMIS User Confidentiality Agreement, including without limitation to the failure to comply with the policies and procedures related to the KYHMIS as contained in this manual, may subject the participating agency to discipline and termination of access to the KYHMIS and/or termination of other Kentucky Housing Corporation (KHC) contracts. All participating KYHMIS Projects, as well as Victim Service Providers funded by the U.S. Department of Housing and Urban Development, the U.S. Department of Veterans Affairs, the U.S. Department of Health and Human Services, and SAMSHA, are required to abide by the policies and procedures outlined in this manual.

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Vision Statement

The vision of the KYHMIS database is to operate a user-friendly data collection system that produces timely, accurate, and complete information for stakeholders to use, ensuring the effective delivery of housing and services to alleviate homelessness in Kentucky.

Introduction

The Kentucky Homeless Management Information System (KYHMIS) was developed to support Kentucky's Continuum of Care and partner agencies in their missions, by supplying them with the tools to gauge data and outcomes for their projects. The KYHMIS provides information to the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Veterans Affairs (VA), the U.S. Department of Health and Human Services (HHS), Substance Abuse and Mental Health Administration (SAMHSA), local nonprofit boards, state-level policy makers, and other advocates in their missions.

The KYHMIS is a client information database that provides a standardized assessment of client needs, creates individualized service plans, and records the use of housing and services. The fundamental goal of the KYHMIS is to use the data to determine the utilization of services of participating agencies, identify gaps in the local service continuum, and develop outcome measurements. The KYHMIS can identify patterns in the utilization of assistance, as well as document the effectiveness of services for clients.

All this will be accomplished through data analysis of the actual experiences of persons, as well as the service providers who assist them in shelters and assistance projects throughout the state. This data may also be analyzed to provide unduplicated counts and anonymous aggregate data to policy makers, service providers, advocates, and consumer representatives. Statewide reporting is based on aggregate, non-identifying data; therefore, such data may be shared with the public.

The KYHMIS uses a Web-based software product from Bowman Systems called ServicePoint, which resides on a central server to facilitate data collection by service organizations across the state. Access to the KYHMIS is limited to agencies and authorized staff members who have met the necessary training requirements and have signed the necessary privacy, data sharing, security, and licensing documentation, as listed in this manual. As the guardians entrusted with personal data, agencies have both a moral and a legal obligation to ensure that data is being collected, accessed, and used appropriately. All agencies must be vigilant to maintain client confidentiality, treating the personal data of Kentucky's most vulnerable populations with respect.

Every project that receives federal homeless assistance funds is required to enter data on persons served with those funds into the KYHMIS. In addition, some projects funded through the VA, SAMHSA, and HHS are required to enter data into the KYHMIS.

Victim Service Providers (VSP)

Those organizations that are designated as Victim Service Providers (VSPs) that are funded under HUD's Section 8 Moderate Rehabilitation SRO Program, Emergency Solutions Grant Program, and Continuum of Care Program are prohibited from disclosing any personally-identifying information in an HMIS, per the requirements of federal laws.

However, VSPs are required to collect data in a comparable database with the same current HUD Data Standards and provide aggregate data to be combined with KYHMIS data for full reporting to federal agencies and Congress.

Suppression of Potentially Identifying Data in Annual Performance Report (APR)

VSPs may suppress aggregate data on specific client characteristics in the APR when the following two conditions are met:

1. The aggregate number of persons reported for a particular reporting field is less than either 1 percent of the total number of clients or five persons, whichever is greater; **and**
2. Provider staff reasonably believes that the inclusion of such information may constitute a threat to a client by allowing a victim's stalker or abuser to identify the location of a client with an uncommon demographic profile.

For example, a VSP that serves only one Asian client in a jurisdiction with a small Asian subpopulation may report that client as having an unknown or unreported race.

Minimal Standards for a “Comparable Database”

VSPs that receive funding must submit unduplicated aggregate reports about the individuals and families served with HUD funds to CoC HMIS staff. Funded providers must also have a mechanism to track the length of assistance provided to project beneficiaries. Therefore, a VSP's comparable database must collect client-level data over time and generate unduplicated aggregate reports based on that data. It cannot be a database that only records aggregate information.

The comparable database must comply with all current HUD Data and Technical standards which can be found at <https://www.hudexchange.info/hmis/guides/>.

The data standards also require organizations to comply with any federal, state, and local laws that require additional confidentiality protections, including but not limited to:

- The Health Insurance Portability and Accountability Act of 1996 (45 CFR Parts 160 and 164)
- The Confidentiality of Alcohol and Drug Abuse Patient Records Rule (42 C.F.R. Part 2)
- The Violence Against Women Act (VAWA)

As these data standards are subject to change, all providers are responsible for monitoring for updates and being in constant compliance with all data standards.

Minimum Data Collection Requirements for Victim Service Providers (VSP)

VSPs are required to collect and record all data elements that are required for HUD-funded providers on all clients served with HUD funds in a comparable database. The client-level data collection requirements for HUD projects are specified in the HUD Data Standards Notice.

Each CoC HMIS Lead Agency is responsible for determining if the database used by VSP's is comparable with HMIS standards and if aggregate data can be reported to the CoC from the comparable data base.

Kentucky Homeless Management Information System (KYHMIS)

KHC is the lead entity for the statewide KYHMIS implementation in Kentucky. KHC administers the ServicePoint software product for all three Continuum of Care (CoC) in Kentucky: Kentucky Balance of State CoC, Louisville CoC, and Lexington CoC. KHC is the HMIS Lead Agency for the Balance of State KYHMIS. The City of Lexington, Office of Homeless Prevention and Intervention (OHPI) is the HMIS Lead Agency for the Lexington CoC and the Coalition for the Homeless is the HMIS Lead Agency for the Louisville CoC. All three CoCs work together in support of an effective, coordinated system.

Continuums of Care

- Balance of State (118 counties) – KY-500
- Louisville/Jefferson County – KY-501
- Lexington/Fayette County – KY-502

Kentucky Interagency Council on Homelessness (KICH) and Kentucky Homeless Management Information System (KYHMIS)

KICH was established by executive order to bring together state policy makers, service providers, and advocates under the mission of coordinating and guiding policy across Kentucky to alleviate homelessness. Efforts in this mission rely on data for many different purposes. KICH has established the Data Subcommittee to help monitor the occurrence of homelessness and track trends, evaluate the effectiveness of projects and policies, and provide information for planning and decision making. While KYHMIS is not the sole source of data, it is a vital component.

KHC's KYHMIS staff will collaborate with the HMIS Lead Agencies for the Lexington CoC and the Louisville CoC to provide the KICH Data Subcommittee data reports.

Terminology

Advanced Reporting Tool (ART): Bowman Systems provides ART to give users access to a wide variety of reports. The ART is used commonly for federal reporting and project customization of reports. This tool is scheduled to be replaced by another reporting system in late 2018.

Agency Administrator: This person is their agency's lead KYHMIS contact and is responsible for system administration at the agency level.

Annual Performance Report (APR): A reporting tool used to track progress, accuracy and completeness of data and accomplishments of projects.

Bowman Systems: Often referred to as "Bowman," this is the company/vendor who created and maintains the KYHMIS system (Service Point) and reporting tools.

Client: An individual that a participating KYHMIS project collects or maintains personal identifiable information.

Continuum of Care (CoC) Project: Project identified in KYHMIS as receiving funding from HUD through the competitive CoC application process.

Executive Director: A person who serves as the top executive official of a participating agency.

Housing Inventory Count (HIC): An inventory of beds for homeless persons, including seasonal and overflow beds.

Kentucky Housing Corporation (KHC): The lead entity for the statewide KYHMIS implementation in Kentucky.

Participating Agency: Any agency/project that enters client information into KYHMIS.

Protected Personal Information (PPI): Information about a project participant that can be used to distinguish or trace the participant's identity, whether alone, or when combined with other personal identifying information.

Release of Information (ROI): A document signed by the client or verbal approval by client authorizing or denying sharing of their PPI, service information, or other pertinent client data in KYHMIS.

ServicePoint: A software system created by Bowman Systems, which tracks data about people in crisis to determine individual needs, provide a referral system, and create aggregate data for reporting and planning. ServicePoint is Web-based and uses a standard graphical user interface similar to Microsoft Windows.

User: An individual who has been granted access to and uses KYHMIS.

User License: An agreement between the individual and the CoC HMIS Agency that allows access to the KYHMIS.

Roles and Responsibilities

Kentucky Housing Corporation (KHC)

KHC is the lead agency for the implementation and maintenance of the statewide KYHMIS.

KYHMIS Management

Policy:

KHC is responsible for the organization and management of the KYHMIS. KHC KYHMIS staff is responsible for the all system-wide policies, procedures, communication, and coordination for KYHMIS.

KYHMIS staff will follow protocols established by Bowman Systems, LLC.

KHC KYHMIS staff will notify Bowman Systems of any software issues within 12 hours of being made aware of the issue and after an investigation at the state level has taken place.

All information received from Bowman Systems pertaining to use, access, reporting, or live site system will be disseminated through each CoC's HMIS Lead Agency staff and then to each Agency Administrator within three business days of receipt.

KYHMIS Documentation

To ensure the integrity and security of sensitive client confidential information and other data maintained in the database, KHC requires all participating agencies and users to sign the KYHMIS Acknowledgement of Receipt of the KYHMIS Policies and Procedures Manual and Security Monitoring prior to being given access to the KYHMIS.

Policy:

CoC HMIS Lead Agency staff will provide the necessary manuals and forms for all users within their CoC. These documents will be kept up-to-date and in compliance with HUD and all other funders' policies and requirements.

In the event a funder issues changes to the requirements, all related documentation will be reviewed and updated collaboratively by KHC and CoC HMIS Lead Agency staff.

If a funder's requirements necessitate immediate implementation of changes, such changes will be communicated to all three CoC HMIS Lead Agencies. All changes will be communicated to participating agencies and HUD-funded VSPs through the KHC eGram system and System News on KYHMIS.

Security Management

Policy:

KHC is ultimately responsible for the continuous monitoring of security of data for the Balance of State as well as monitoring security of data for all other CoC KYHMIS Lead Agencies. Due to the nature of technology, unforeseen service outages may occur. In order to assure service reliability, Bowman Systems provides a comprehensive [disaster recovery plan](#).

All major outages are immediately brought to the attention of KHC leadership staff. Bowman Systems support staff helps manage communication or messaging to the KYHMIS staff as progress is made to address the service outage. KHC KYHMIS staff, in turn, will communicate status updates to the KHC leadership staff and CoC HMIS Lead Agencies.

Training

Policy:

The CoC's HMIS Lead Agencies will provide timely training for all new users, in the most efficient and effective way possible. Users must participate in and satisfactorily complete "KYHMIS New User Training" prior to approval for access to KYHMIS. Users must participate in at least one KYHMIS Refresher Training course every year to have the continuing skill set for data collection and reporting.

Ultimately it is the responsibility of the participating agency's Executive Director to identify staff that will become KYHMIS Users and KYHMIS Agency Administrators. Executive Directors are responsible to choose users that have basic computer skills, including knowledge of how to navigate the Internet, email, and basic knowledge of data entry into an online software system prior to the users participating in the initial KYHMIS training. In addition, Agency Administrators need to have skills beyond that of a basic user.

CoC KYHMIS Lead Agencies may withhold user licenses from a participating agency if users are not able to demonstrate the skills needed to access the KYHMIS.

CoC KYHMIS Lead Agencies will ensure the following minimum standards are met for training:

- User
 - Security and Confidentiality Training (annually)
 - New User Training
 - Refresher Training (annually)

CoC KYHMIS Lead Agencies may suspend user credentials for any user who is out of compliance with the required annual training until all training requirements have been fulfilled.

Agency Management

Policy:

Participating agencies will notify the CoC Lead Agency of any changes with projects including: additions and discontinuations of projects and users via the HCA Help Desk at <http://kyhmis.zendesk.com>. CoC HMIS Lead Agencies will set-up and de-activate agencies, projects, and users, as needed.

User Management

Policy:

CoC's KYHMIS Lead Agency staff will give appropriate levels of access to the system based on user's position in the participating agency, configuration of projects, and designation by the Executive Director. To protect client security, users will always be assigned the most restrictive access possible that will still allow efficient job performance.

System Availability

Bowman Systems provides highly available HGIS software and informs the KYHGIS statewide implementation through the Bowman Newsflash of any planned interruption in service. CoC HGIS Lead Agencies will inform the participating agencies pursuant to the following policy.

Policy:

Scheduled upgrades and maintenance will occur as arranged. CoC KYHGIS Lead Agencies will inform users of the exact date and time prior to scheduled upgrade via:

- ServicePoint News
- KHC eGram notification
- E-mail notification

In the event of an unscheduled unavailability for an extended period of time, all participating agencies will be contacted by email and informed of the cause and the anticipated duration of the interruption of service.

Participating Agency

Security Management

Policy:

Participating agencies are responsible for ensuring all hardware and software used to access and/or store KYHGIS client-level data is in a secure location where access is available to authorized staff only. Security software will be monitored at least annually by CoC KYHGIS Lead Agencies.

Monitoring may consist of a desk monitoring or an on-site monitoring. Failure to complete any corrective actions resulting from monitoring in the given time period may result in deactivation of all participating agency user accounts and the participating agency may be non-compliant with HUD and/or other funding regulations.

CoC KYHGIS Lead Agencies will ensure the participating agency meets the minimum requirements listed:

Participating agencies **must** have:

- A secure broadband Internet connection.
- Wi-Fi is acceptable, **if** the connection is protected by a network security code.

All Workstations at the participating agency that access KYHGIS **must** have:

- Memory:
 - Windows 10 – 2 Gig minimum
 - If Win7 – 2 Gig minimum
 - If Vista – 2 Gig minimum
 - If XP – 1 Gig minimum
- Monitor:
 - Screen Display – 1024 by 768 (XGA) or higher (1280 by 768 strongly advised)
- Processor:
 - An Intel or AMD Dual-Core processor or better
- Browser:
 - Firefox is recommended for use with Service Point.
 - Internet Explorer is recommended for using the ART reporting tool.
 - Google Chrome will not function with the ART reporting tool.
- Password Protected Workstation:

- All workstations **must** be locked if a licensed User leaves a workstation when ServicePoint is active.
- Current and Active Security:
 - Real-time antivirus scanning
 - Manual virus scanning
 - Automatic virus removal
 - USB virus scanning
 - Anti-spyware
 - A firewall
 - Anti-phishing
 - Anti-spam

Records Management

Policy:

Participating agencies must maintain appropriate documentation of any Client Acknowledgement and Release of Information records obtained in a secure location for a period of five years after the last date of client service and assure their subsequent destruction by shredding or burning. Records must be made available to the client, upon written request, within five business days.

Compliance monitoring is completed by CoC HMIS Lead Agencies, as requested by funders or required by regulation. CoC HMIS Lead Agencies will require participating agencies to show proof of compliance at time of monitoring. Failure to comply may result in deactivation of all participating agency user accounts, and the participating agency may be non-compliant with HUD and/or other funding regulations.

Privacy Management

Policy:

Participating agencies will be solely responsible for posting the most current “Privacy Notice” in a location for all clients to easily find and read and also have a copy of the current “Privacy Policy” on hand.

The current “Privacy Notice” and “Privacy Policy” can be found at <https://kyhmis.zendesk.com>. All correspondence regarding updates to “Privacy Notice” and “Privacy Policy” will be sent to agencies in the form of an eGram and posted on ServicePoint News.

Compliance monitoring is completed by CoC HMIS Lead staff, as requested by funders or required by regulation. CoC HMIS Lead Agencies will require agencies to show proof of compliance at time of monitoring. Failure to comply will result in deactivation of all participating agency user accounts and the participating agency may be non-compliant with HUD and/or other funding regulations.

Data Sharing

Policy:

Data sharing among KYHMIS participating agencies will be supported automatically for all participating KYHMIS agencies. All PATH, RHY, HOPWA and Recovery Kentucky projects are exempt from participation in data sharing under federal statute.

All projects, with exception of PATH, RHY, HOPWA and Recovery Kentucky programs, will have data sharing privileges set by CoC HMIS Lead Agencies for client-level data. The

standard level of client-level data sharing privileges will be set as in the Global Sharing Policy in this document.

All agencies “opt-in” by signing the Acknowledgement of Receipt of the KYHMIS Statewide Policy Manual annually. The original agreement is to be provided to the CoC HMIS Lead Agency with a copy being retained by the participating agency.

Agencies wishing to “opt-out” of sharing information electronically through the KYHMIS are required to complete a Data Sharing Exit Agreement signed by the Executive Director stating their reasons for opting out and submit it to the CoC HMIS Lead Agency. Sharing of information ends on the date the participating agency signs the Exit Agreement. All client information shared prior to the Exit Agreement date will continue to be shared.

At a minimum, CoC HMIS Lead Agencies will:

- Define each User’s access type as described in the Access section of this manual.
- Conduct random file checks for appropriate client authorization based on participating agency risk determination
- Conduct random User audit reports

Participating Agency Executive Director

Policy:

The Executive Director is responsible for ensuring their agency and all licensed users within their agency abide by all CoC established regulations, standards, policies, and procedures in regards to the KYHMIS and clients’ rights.

CoC HMIS Lead Agencies will ensure that the Executive Director complies with applicable funding agreement requirements regarding the KYHMIS participation. In addition, they will ensure the Executive Director completes and submits the Acknowledgement of the KYHMIS External Policies and Procedures Manual for each user, KYHMIS Annual Agency Privacy and Security Monitoring Form, and Data Sharing Exit Agreement (if applicable). These forms must be reviewed and signed on an annual basis. Failure to comply may result in deactivation of all participating agency user accounts and the participating agency may be non-compliant with HUD and/or other funding regulations.

Ultimately Responsible

Policy:

The Executive Director is ultimately responsible for compliance with the KYHMIS Statewide Policy Manual along with any CoC level supplemental policies; which includes, but is not limited to: knowledge and understanding of client rights, grievance procedures, data sharing, agency security, and all actions and work conducted by licensed Users in their agency, including those no longer employed at their agency.

Executive Directors are ultimately responsible for:

- Verifying and signing all reports or information distributed by their agency for submission or publications,
- Notifying CoC HMIS Lead Agency prior to or within 24 hours if a user should be removed from the KYHMIS.
- Completing, signing, and submitting KYHMIS required documentation annually, or upon request.

- Adhering to any additional requirements that may be deemed necessary by the funder or the CoC.

Failure to comply may result in deactivation of all participating agency user accounts and the participating agency may be non-compliant with HUD and/or other funding regulations.

Agency Administrator

An Agency Administrator is the liaison between CoC HMIS Lead Agencies and all other participating agency users. CoC HMIS Lead Agencies shall ensure they have a valid, up-to-date email address for each of their Agency Administrators and shall set their User Role as that of “Agency Administrator” in the KYHMIS.

System Management

Policy:

Agency Administrators will assist, as needed, CoC HMIS Lead Agencies in implementation of system upgrades, report development, and system testing. Agency Administrators will also be responsible for disseminating all information to users within their agency.

Agency Management

Policy:

The Agency Administrator will be responsible for updating, correcting, and maintaining the participating agency information in the KYHMIS.

CoC HMIS Lead agencies will train Agency Administrators on how to change and update information regarding their agency and all projects within their agency and require the information is verified and updated as needed. Failure to comply in maintaining correct participating agency and project information in the KYHMIS will result in suspension of all participating agency licenses until corrections are made and the participating agency may be non-compliant with HUD and/or other funding regulations.

Report Management

Policy:

Agency Administrators are responsible for supplying the Executive Director with all required reports and/or information for verification and signature in a timely manner prior to submission.

CoC HMIS Lead Agencies will ensure Agency Administrators have knowledge and understanding of reports, due dates, submission dates, and the appropriate person/agency for submission.

If the Agency Administrator has concerns and/or questions regarding any of the participating agency's reports, the Agency Administrator will be required to submit a ticket to the KYHMIS Help Desk at <https://kyhmis.zendesk.com> 7 days prior to final submission of report. Failure to submit a ticket within the appropriate time frame may result in CoC HMIS Lead Agencies not having adequate time to render assistance. CoC HMIS Lead Agencies will not be held liable for failure to render timely solutions when there is less than 7 days to respond.

User

A licensed KYHMIS User is responsible for ensuring their participating agency's client-level data is entered correctly and complies with all client rights, confidentiality, and data sharing in compliance with CoC regulations, standards, policies, and procedures. CoC HMIS Lead Agencies will provide the appropriate training for Users as outlined in the "Training" section of this manual.

Client-Level Data

Policy:

CoC HMIS Lead Agencies will ensure that Users will not knowingly enter false or misleading information under any circumstances into KYHMIS regarding the participating agency, project, or client.

When requesting reports from a participating agency, CoC HMIS Lead Agencies will require Agency Administrators review and verify the report prior to submission. If issues concerning client-level data are raised, CoC HMIS Lead Agencies may conduct a data audit and a monitoring site visit. Failure of a participating agency or user to comply, or if there is proof of a violation, can result in deactivation of the user's license permanently.

Ethical Data Use

Policy:

Data contained in the KYHMIS will only be used to support the delivery of services. Each KYHMIS licensed user will affirm the principles of ethical data use and client confidentiality by signing this document.

Any individual or participating agency misusing or attempting to misuse KYHMIS will be denied access. Without limitation the failure to comply with the policies and procedures related to the KYHMIS, may subject the participating agency to discipline and termination of access to the KYHMIS and/or termination of other KHC contracts. Other funders will be notified by KYHMIS staff of failure to comply.

Data Sharing

Policy:

CoC HMIS Lead Agencies will ensure that at no time shall a licensed User alter, change, or delete other agencies' data in compliance with the data-sharing policies. At a minimum, they shall communicate with the other agency; whereby both agencies involved in the disputed accuracy of data are consulted and a joint resolution reached.

Client Release of Information

Policy:

Users **must** obtain a verbal (not for BOS agencies) or signed Client Acknowledgement and Release of Information document for each client prior to entering data into the KYHMIS for client information that will be shared.

Users **must** supply the KYHMIS client record with an end date (365 days from entry) for each release of information. Recovery Kentucky client records must have an end date not exceeding 2 years from entry.

If the Client Acknowledgement and Release of Information has expired, the user **must** obtain a new release prior to updating records.

Verbal and signed Client Acknowledgement and Release of Information forms **must** be secured and retained for five years from the date of the last service for the client.

Data Standards

Policy:

Users must enter all data into the KYHMIS or, if applicable, a comparable database in accordance with the current HUD Data Standards.

CoC HMIS Lead Agencies shall ensure all Users have access to and understand the most current HUD HMIS Data Standards.

Clients

KYHMIS is a system for information to be passed from participating agency to participating agency regarding client information, services, and referrals. KYHMIS is geared to save clients time in telling their “story” and providing documentation. At no time should a client’s rights, confidentiality, or requests be violated.

Denial of Service

Policy:

No client shall be denied a service for declining to release information or refusal to answer informational questions not required for service eligibility screening.

Prior to collecting client-identifying information by the participating agency, clients **must** first sign or verbally (not for BOS agencies) agree to the Client Acknowledge and Release of Information document, acknowledging their request to share or deny sharing of information.

Access to Data

Policy:

Clients may have access to their data at any time and can ask for detailed explanation of the information given to them.

Clients may submit a written request for a printed report of their data in KYHMIS to the CoC HMIS Lead Agency.

Changing Information

Policy:

Clients may request that agencies update incomplete and/or incorrect data. However, agencies have the right to deny this request.

Procedure:

- Contact CoC HMIS Lead Agency to determine validity of request to update or correct data in KYHMIS.

Denial of Access

Policy:

CoC HMIS Lead Agencies and participating agencies reserve the right to deny access to an individual's personal KYHMIS records for any of the following reasons. The denial is required to be documented; including original request and reason for denial.

- Information compiled in reasonable anticipation of litigation or comparable proceedings.
- Information about another individual (other than a health care or homeless provider).
- Information that by disclosure would be reasonably likely to endanger the life or physical safety of any individual.

Educating Clients of Privacy Rights

Policy:

The participating agency employee that obtains data from the client will work with the client to understand their privacy rights, benefits of sharing data, and what their data is used for once entered into the KYHMIS. CoC HMIS Lead Agencies are not liable for client-level data that has been entered into the KYHMIS by a User in which the client's right to privacy was violated.

At a minimum, CoC HMIS Lead Agencies shall ensure participating agencies:

- Make the "Privacy Notice" available to the client upon request.
- Are knowledgeable regarding data-sharing policies, release of information policies, and security of data.

Client Denial to Share

Policy:

Clients have the right to choose not to have their data shared.

A participating agency that has a data sharing agreement with other participating agencies must lock down this client's record to be visible only to the participating agency that originally entered the data.

The participating agency must contact the CoC HMIS Lead Agency prior to entering client level data into KYHMIS for instructions on how to set the visibility settings appropriately.

Communication

Between KYHMIS Staff and CoC HMIS Leads

Policy:

KYHMIS Staff is responsible for relevant and timely communication with each CoC HMIS Lead Agency in the statewide implementation regarding all aspects of the KYHMIS, reporting, and data standards. CoC HMIS Lead Agencies are responsible for relevant and timely communication with participating agencies.

KYHMIS staff will provide communication through:

- Regularly scheduled System Administrator Meetings
- Regular publications of KHC's eGram
- Email notification
- KYHMIS System News

- FAQs, tip sheets, documentation, policies, procedures, reporting matrix, and general help published on the KYHMIS Help Desk at <https://kyhmis.zendesk.com>.

KYHMIS Help Desk

KYHMIS staff maintains a user Help Desk referred to as “Zendesk.” The goal of Zendesk is to operate in an effective and efficient manner assisting users in the order in which the tickets were submitted. The KYHMIS has over 350 users and 800 projects. By requesting assistance through the Help Desk, users receive documentation of their ticket submissions and responses from CoC HMIS Lead Agency Staff.

Policy:

Participating agency’s Users will submit requests for specific research data, system enhancements, technical support, helpful hints, training tips, documentation to download; password reset requests, etc. to the KYHMIS Help Desk.

The Help Desk shall be available from 8:00 a.m. to 4:30 p.m. ET, Monday through Friday, excluding KHC holidays. CoC HMIS Lead Agencies will respond to Help Desk submissions from their respective CoC. The following guidance is applicable to the process to be followed by each CoC HMIS Lead Agency:

- Tickets will be addressed in the order of receipt.
- Tickets will be addressed within 3 business days.
- All Help Desk tickets received after 4 p.m. ET will be addressed the next business day.

Tickets asking help to identify or resolve issues with reports **must** have the report in question attached to the ticket. Failure to attach the report will result in a delay in the response to the ticket.

Access

KHC and CoC HMIS Lead Agency Staff

Policy:

KHC and CoC HMIS Lead Agency staff will have access to retrieve all data in the KYHMIS. Access to individual client-level data will only be for the purpose of direct client service-related activities, reporting/maintenance, checking data quality, and responding to Help Desk Tickets.

The CoC Lead staff will oversee all reporting to HUD and the public. All special research requests will be handled directly by the CoC Lead in coordination with the requesting participating agency. All information collected and analyzed will not be shared with others without the written consent of the requesting participating agency.

User Access

Policy:

Each CoC HMIS Lead Agency will be responsible for assigning user access for the agencies within the geographical designation of their Continuum.

Public Access

Policy:

CoC Lead Agencies, will address all requests for data from entities other than participating KYHMIS agencies and HUD-funded VSPs or clients. The public is not given access at any time.

Procedure:

- The KYHMIS can enter into data-sharing agreement with outside organizations under contract with KHC for:
 - Research.
 - Data Matching.
 - Evaluation of Services/Planning.
- Contracts must include an MOU or MOA. Any MOU or MOA initiated and executed by CoC Lead Agencies must be communicated to KHC.
- Data-sharing agreements will require that all parties certify that they will adhere to the strict standards of protecting client-level data employed by the KYHMIS.
- All public requests for information must be made in writing to KYHMIS staff.
- KYHMIS staff will issue periodic public reports about homelessness and housing with no previous notice to participating KYHMIS or HUD-funded VSP agencies. Such public reports will not reveal identifying information at the client-data level.

Security

Bowman Systems and/or Mediuware

System Security

Policy:

KHC shall ensure that Bowman Systems and/or Mediuware maintain the highest level of system security for the ServicePoint software and hardware.

Bowman Systems and/or Mediuware employees who have access to client-level data are subject to a national background check, training on confidentiality requirements, and must sign a confidentiality statement as part of their employee agreement.

The system function logs the time and type of activity, as well as the name of the user who viewed, added, edited, or deleted the information.

Servers are located in complexes with:

- 24-hour security personnel.
- 24-hour video surveillance.
- Dedicated and secured Data Center.
- Locked down 24-hours per day.
- Only accessible by management-controlled key.
- No access is permitted to cleaning staff.
- State-of-the-art HVAC and fire suppression system

Data Security/Disaster Plan

Policy:

KHC shall ensure that Bowman Systems and/or Medware maintain the highest level of data security for the ServicePoint software.

The traffic that flows between the server and the user's workstation is encrypted using the SSL certificate installed on KHC's dedicated server. Database tape backups are performed nightly. Seven days' backup history is stored on instantly accessible Raid 10 storage with one month's backup history being stored offsite.

KYHMIS staff have 24/7 access to Bowman Systems' and/or Medware emergency line to provide assistance related to outages or downtime.

Unauthorized Access

Policy:

KHC shall ensure Bowman Systems and/or Medware has processes in place to address unauthorized access.

If an unauthorized entity were to gain access to the KYHMIS and client data, or if there were suspicion of probable access, Bowman Systems and/or Medware would take the following steps:

- The system would be examined to determine the presence of system or data corruption.
- If the system has been compromised, the system would be taken offline.
- Using the previous night's backup, a restored copy of the system data would be loaded onto another server, and the system brought back online with the back-up copy.
- Comparing the back-up database to the database taken offline, an investigation would be launched to determine the extent of the unauthorized activity/corruption, and the corrective action needed.
- Upon completion of the investigation, findings would be reported to KHC and options would be discussed.
- Upon KHC's approval, corrective action would be initiated. Corrective action could include all or part of the following:
 - The original hard drive would be completely erased and rebuilt, including a new operating system, SSL Certificate, applications, and the back-up database.
 - If applicable and feasible, lost data from the original database would be restored.

Licensed Users

User Access

Policy:

A newly licensed user must sign and submit required documentation prior to receiving access to the system. All licensed users must re-submit required documentation annually.

CoC HMIS Lead Agency staff will provide unique usernames and temporary passwords to each licensed user that has completed the minimum training requirements as outlined in this manual. Each user will create a unique password of their own choosing upon initial log-in. Passwords should be reset at a minimum of every 45 days.

Users will keep passwords confidential. Usernames and passwords may not be exchanged or shared with other users. The sharing of usernames is a breach of the KYHMIS policies and procedures. Exchanging usernames seriously compromises security and accountability to clients. If a breach occurs, it may subject the participating agency to discipline and termination of access to the KYHMIS and/or termination of other KHC contracts.

Bowman Systems and/or Mediware, KHC, and CoC HMIS Lead Agency staff are not liable for actions of a former participating agency employee with an active license if the participating agency fails to give notification of termination prior to or within 24 hours of that termination.

Password Recovery

Policy:

CoC HMIS Lead Agencies will only reset forgotten passwords after verification of User access status. Reset information is preferred to be sent via Help Desk Ticket and not by direct contact. Response to the request will be sent back through the Help Desk.

Location of Data Access

Remote Access

Policy:

Users will ensure the confidentiality of client data, following all security policies and adhering to the standards of ethical data use, regardless of the location of the connecting computer. KYHMIS is intended to be accessed only on-site from the participating agency's network, desktops, laptops, and mini-computers that are Web capable.

In special circumstances, user access from remote locations may be permitted after approval by CoC HMIS Lead Agency Staff. All users that access KYHMIS remotely must meet the standards detailed in the security policies and procedures and may only access it for activities directly related to their job.

Examples of Remote Access:

1. Personal laptops that were not purchased by the participating agency.
2. Access to the KYHMIS on a network other than that of the participating agency.
3. Private home desktops.

The Executive Director has the responsibility to ensure the user is in compliance with this and all other policies, procedures, agreements, and rules governing KYHMIS.

Agency Data

Data Retrieval

Policy:

KYHMIS-participating agencies will have access to retrieve any individual client-level data and aggregate data for their own projects. Participating agencies will not have access to retrieve client-level or aggregate data for other participating agencies or system-wide.

Agency Administrators and Users using the ServicePoint Report Writer or ART will only be able to extract data from those records to which they have access based on their level of security given by the CoC's HMIS Lead Agency staff. Whenever a user attempts to access an

aggregate report for unauthorized data, the report will show “0”. Both Report Writer and ART will limit the user access and only report data from records to which the individual user has access.

Extracted Data

Policy:

KYHMIS-participating agencies have access to retrieve any individual client-level data and aggregate data for their own projects and download the information onto a local storage vessel. Users will maintain the security of any client data extracted from the database, including data used in custom reporting.

Compliance Security Review

Policy:

KYHMIS-participating agencies are subject to random or scheduled compliance monitoring checks completed by KYHMIS CoC.

Scanned Document Management

Policy:

KYHMIS staff is responsible for organization and management of the KYHMIS. The following standardized procedures to upload documents must be followed to ensure uploaded information is useable system-wide.

- Documents uploaded to a client must have the naming standards of:
 - Client ID#, Document Title, Date Saved
 - For Example: 123456, Homeless Verification, 11/20/2013
- File attachments may only be uploaded to the client profile screen under “File Attachments.”
- Users may never remove documents of another participating agency and may only remove theirs when uploading an updated version, or removing incorrect information.
- Unless otherwise noted by an opted-out data sharing project or a client denial, all file attachments will be shared system-wide.

Globally-Shared Information

Policy:

KHC and the CoC HMIS Lead Agencies have set sharing standards for each area of KYHMIS. At any time, a CoC HMIS Lead Agency may choose to close or share a section for privacy protection or coordinated assessment needs. The intent of KYHMIS is to allow as much data sharing as appropriate and necessitated by clients’ needs and services provided to meet those needs.

Data Quality

The Data Standards established by HUD and KHC are applied to all participating agencies’ projects reporting client-level data in KYHMIS. To have correct, accurate, and reliable reporting in a timely manner, CoC HMIS Lead Agencies are required to ensure all participating agencies adhere to the policies and procedures established.

Required Data Collection Fields

Policy:

All KYHMIS-participating agencies and all HUD-funded VSP agencies must comply with the current Data Standards set by HUD and participating federal partners.

The current HUD Data Standards can be found at <https://www.onecpd.info/hmis/hmis-data-and-technical-standards/>.

CoC KYHMIS Lead Agencies will ensure:

- All projects are entering all data fields that appear on their client entry, interim, exit, and follow-up fields to allow for required reporting and analysis to occur.
- Users are trained to follow the correct workflow for the project. When a user does not complete the correct fields in the correct workflow, reports will reflect “nulls,” “missing,” or “non-HUD acceptable” errors.
- All projects are aware they have the option to complete more data assessment fields. CoC KYHMIS Lead Agency staff will establish additional assessment fields when such requests are received by the Housing Contract Administration Help Desk or requested directly to their KYHMIS System Admin.
- All CoC KYHMIS Leads should share information regarding new implementations, major updates, etc. added to the system prior to adding them to the live site. This information must meet system requirements and be approved via discussion in system admin meetings.

Data Entry Time Limits

Policy:

Participating agencies should enter client-level data in real time to maintain the referral process and records on services rendered. However, agencies **must** enter all client-level data within three business days of occurrence or from when participating agency obtains the data.

Data Accuracy

Accuracy is defined as reports run by participating agencies with no errors or missing items flagged.

Policy:

Participating agencies must strive for high data accuracy and integrity on all reports.

CoC HMIS Lead Agencies shall set policies for participating agencies self-monitoring. These policies should include the requirement for submission of specific data reports (i.e., Data Quality Framework, APR) that show appropriate accuracy. The policy shall also include consequences for failure to submit accurate reports and a timeline for the agencies to correct the reports.

Housing Inventory Count

Policy:

Each CoC HMIS Lead Agency is responsible for completing the Housing Inventory Count (HIC) for their CoC.

- Projects deemed emergency shelters, transitional housing, or permanent housing projects **must** submit a Housing Inventory Count form to their CoC Lead Agency on the designated day following the Point-in-Time Count.
- Projects must show a bed utilization rate that is above 65 percent and less than 105 percent, per HUD standards. The Executive Director or designated person must submit a written explanation with the form if the project is below or above said HUD standards.
- If an agency does not submit or comply with above standard, the CoC Lead Agency will contact the Executive Director within five business days of due date. The Executive Director or designated person will have five business days to comply.
- If an agency does not re-submit an accurate report after five business days, the appropriate CoC Lead Agency staff will notify the funder and all agency user licenses will be suspended.
- Failure to comply with these standards will result in suspension of all licensed agency users, as well as the possible suspension of draw requests.

License Suspension and/or Replacement

Policy:

At any time, the CoC HMIS Lead Agency reserves the right to suspend a User's license if a User is having difficulty entering client-level data and providing accurate reports. The CoC HMIS Lead agency can require additional training and if unsuccessful can require the Executive Director to assign a different staff member to attend training, become licensed, and enter client-level data. KHC is to be notified of any User license suspension.

Violation of Data Quality and Integrity

Policy:

In their discretion, each CoC may hold funds or deduct points on future grant applications for agencies that violate the data quality policies and procedures.

Licensing and Invoicing

To carry out its responsibilities as the lead system administrator for the KYHMIS, KHC has secured funding through the Kentucky BoS CoC project funds. By seeking to maximize these resources, KHC has been able to keep ServicePoint user fees at an affordable level. Agencies that receive federal funds but are exempt from participating in the KYHMIS pay a nominal data collection fee to help cover the costs of handling data that does not come through the KYHMIS, but is analyzed and combined with KYHMIS data for reporting. KHC addresses the annual licensing and invoicing for the Louisville CoC and the Lexington CoC through Memorandums of Understanding.

PLEASE NOTE: Prior to KHC issuing HMIS invoices to agencies, there will be notifications and reminders listed in KHC e-grams several times. Agencies are encouraged to read each e-gram and look for articles announcing upcoming HMIS invoicing.

Annual Invoice

Policy:

In late June of each year, KHC staff will process an Annual Invoice to each agency in the Balance of State and the Lexington CoC. (The Louisville CoC will invoice their member agencies separately.) In early June, KHC will encourage all agencies to confirm the number of annual user licenses they will need for the upcoming fiscal year. It is the responsibility of the agency to notify KHC KYHMIS staff of any change in the number of licenses that will be invoiced.

The Annual invoice will be emailed to agencies using the on-line PNC Payment System (<https://www.payerexpress.com/ebp/KHC/>). The email will be sent to the identified contact person in the payment system. It is the responsibility of each agency to enroll in the payment system, to enter the required banking information, and to ensure that the contact person is correct or to make any necessary changes in the system.

When the agency receives the invoice, they will need to log on to the payment system and initiate payment by electronic payment. No paper checks will be accepted by KHC. If any paper checks are received, they will be returned to the agency not processed.

Any invoice unpaid by the due date will be assessed a 10% late fee. Any invoice still unpaid after 30 days will be assessed an additional 10% late fee. Any invoice remaining unpaid after 60 days will require the KHC KYHMIS staff to suspend the agency's usage of the KYHMIS system. If an agency's usage has been suspended, KHC will not process any draws for payment of any grant or program administered by the agency until the invoice is paid in full and the user licenses are activated.

All Victim Service Providers (VSP) agencies will receive an annual data maintenance invoice due on the same schedule listed above.

Quarterly New User Fee Invoices

Quarterly, KHC still will issue a New User Fee Invoice for each agency that added a new user during the previous quarter. A new user is defined as an additional license not billed during the annual invoice process. If a new staff member of the agency replaces a previous staff person and assumes their user license, they are not a new user. An additional license is necessary to add a new user.

New user invoices will be calculated on a pro-rated basis calculated beginning on the first day of the full month after their license was activated. Late fees will be assessed if any New User Fee Invoice remains unpaid 30 days after the invoice was issued. Additional late fees will be assessed after 60 days and all agency user licenses will be suspended after 90 days and will remain suspended until the invoice is paid in full.

All processes for issuing the New User Fee Invoice and the process for agency's paying the invoice will be the same as listed above for the Annual Invoice.

Grievances

From a Participating Agency or Client

Policy:

KYHMIS-participating agencies have the right to file a written grievance against KHC or the CoC HMIS Lead Agency. Clients also have the right to file a grievance against a participating agency regarding the KYHMIS. Each CoC HMIS Lead Agency must have a grievance policy on file with KHC.

The CoC HMIS Lead Agency grievance policy must include:

- Definition of categories of grievances
 - Client grievances
 - Participating agency grievances
 - HUD-funded VSP grievances
- Specific steps to be followed for grievance submission
- Process that will be followed to resolve the grievance
- Appeal process of the grievant

Participation Termination

Initiated by the Participating Agency

Policy:

The KYHMIS termination of a participating agency may affect their relationship with their funder. However, in the event of termination, all data entered into KYHMIS will remain an active part of the KYHMIS, and the records will retain their original security settings. CoC KYHMIS Lead Agencies are required to notify KHC upon receipt of a request for termination of contract.

Prior to be granted termination from KYHMIS the participating agency must ensure all clients are properly exited from the terminating agency's program.

Initiated by CoC HMIS Lead Agency

Policy:

CoC KYHMIS Lead Agencies and KHC reserve the right to terminate the KYHMIS Participation Agreement for non-compliance with the terms of that agreement. CoC HMIS Lead Agencies are required to give a participating agency written notice of the intent to terminate and provide a minimum of 10 days for the participating agency to rectify any violations. If termination does occur, the CoC KYHMIS Lead Agency is required to notify KHC of the termination and provide documentation of termination justification. In all cases of termination, CoC HMIS Lead Agency staff will make inactive all users from the participating agency on the date of termination. All client-level data entered into the KYHMIS will remain an active part of the KYHMIS, and the records will retain their original security settings.

Projects in KYHMIS

Adding a New Project in KYHMIS by Agency

Policy:

The Executive Director or Agency Admin will notify the CoC Lead Agency staff 30 days prior to implementation of a new project.

Procedure:

- At least 30 days prior to anticipated implementation date, the Agency Admin or the Executive Director will submit a detailed account of the project to the KYHMIS Help Desk including but not limited to:
 - Name
 - Address
 - Contact Information
 - Services Delivered
 - Type of Housing/Service Project
 - Eligibility Criteria
 - A list of users
 - Location of project
 - Service Area
 - Funding Source
 - Goals for using the KYHMIS

- CoC Lead Agency staff will ensure the following standard formula is used when creating a name within KYHMIS:
 - Parent Agency-Project Name-Funding Source-Type of Service-CoC
 - Example:
KHC-Joe's House Step Two-CoC-PSH-BOS

- CoC Lead Agency staff will present the completed request form and recommended program name to the Agency Admin or Executive Director for approval.

- The Agency Admin or Executive Director will have five business days to communicate changes or corrections.

- CoC Lead Agency staff will complete set-up at least seven business days prior to the implementation date for final approval from the agency.

Making Changes to Existing Projects in KYHMIS

Policy:

The Agency Admin or Executive Director will notify CoC Lead Agency staff of programmatic changes.

Procedure:

- The Agency Admin or Executive Director will notify CoC Lead Agency staff of any applicable programmatic changes to existing programs which may have an effect on data collection, data entry, data quality, or data reporting at least 45 business days prior to the implementation date of the change.

- Recommendations and timelines for the changes will be returned to the agency no more than ten business days from receipt date of request.

- CoC Lead Agency staff will complete changes at least seven business days prior to the implementation date for final approval from the agency.

Additional Customization

Policy:

The participating agency will be solely responsible for additional database customization costs. This includes the voluntary transfer of existing project client-level data and custom built reports beyond that of KYHMIS staff's scope of work.

Procedure:

- The Agency Admin or Executive Director will notify CoC Lead Agency staff of any applicable programmatic customization which may have an effect on data collection, data entry, data quality, or data reporting at least 45 business days prior to the implementation date of the change.
- If support from Bowman Systems and/or Mediware is necessary to make the changes, CoC Lead Agency staff will communicate to Bowman the needs and scope of work for the agency.
- Recommendations and timelines for the changes will be returned to the agency no more than ten business days from receipt date of request, including a Statement of Work from Bowman, if applicable.
- CoC Lead Agency staff will complete changes at least seven business days prior to the implementation date for final approval from the agency.
- If an agency voluntarily transfers an existing project to another agency, KHC will not pay for client-level data to be transferred. The agency requesting the transfer will be liable for any fees incurred.

Acronyms

AIRS – Alliance of Information and Referral Systems
AHAR – Annual Homeless Assessment Report
APR – Annual Progress Report
BoS – Balance of State Continuum of Care
CDBG – Community Development Block Grant
CHO – Contributing Homeless Organization
CoC – Continuum of Care
DOB – Date of Birth
DV – Domestic Violence
ES – Emergency Shelter
ESG – Emergency Solutions Grant
HHS – The U.S. Department of Health and Human Services
HOPWA – Housing Opportunities for Persons with AIDS
HUD – U.S. Department of Housing and Urban Development
I&R – Information and Referral
KHC – Kentucky Housing Corporation
KYHMIS – Kentucky Homeless Management Information System
LEX – Lexington/Fayette County Continuum of Care
LOU – Louisville/Jefferson County Continuum of Care
MCO – Managed Care Organization
MH – Mental Health
NOFA – Notice of Funding Availability
PATH – Projects for Assistance in Transition from Homelessness
PIT – Point in Time Count (K-Count)
PKI – Public Key Infrastructure
PPI – Personal Protected Information
PSH – Permanent Supportive Housing
RHY – Runaway and Homeless Youth
RKY – Recovery Kentucky Project
ROI – Release of Information
S+C – Shelter Plus Care (McKinney-Vento Act Project)
SA – Substance Abuse
SHP – Supportive Housing Program

SO – Street Outreach
SOAR – SSI/SSDI Outreach, Access, and Recovery
SRO – Single Room Occupancy
SSN – Social Security number
SSDI – Supplemental Security Disability Income
SSI – Supplemental Security Income
SSO – Supportive Services Only
SSVF – Supportive Services for Veteran Families
TA – Technical Assistance
TANF – Temporary Assistance for Needy Families
TH – Transitional Housing
VA – Veterans Affairs Administration
VAWA – Violence Against Women Act
VSP – Victim Service Provider
XML – Extensible Markup Language

Acknowledgement of Receipt of the KYHMIS Statewide Policy Manual

I certify that I have read and will comply with all requirements placed upon Users as stated in the KYHMIS Policies and Procedures.

User Initials:

____ My User ID and password are for my use only and must not be shared with anyone.

____ I must take all responsible means to keep my password physically secure.

____ I understand that the only individuals who can view information in the KYHMIS are authorized Users and the Clients to whom the information pertains.

____ I may only view, obtain, disclose, or use the KYHMIS information that is necessary to perform my job and none other.

____ If I am logged into the KYHMIS and must leave the work area where the computer is located, I must log off of the KYHMIS before leaving the work area.

____ A computer that has the KYHMIS open and running shall never be left unattended.

____ Failure to log off the KYHMIS appropriately may result in a breach in Client confidentiality and system security.

____ Hard copies of the Client's KYHMIS information must be kept in a locked, secure file.

____ Client release forms must be retained in a locked, secure location for five years from date of last service to Client and then destroyed by shredding or burning. When other KYHMIS Client information hard copies are no longer needed, they must be destroyed by shredding or burning to maintain confidentiality.

____ If I notice or suspect a security breach, I must immediately notify the Agency and the System Administrator (KHC/Louisville CoC System Administrator).

____ I must send in requested reports by the designated dates and participate in the Data Quality process.

____ I acknowledge receipt of the KYHMIS Statewide Policy Manual from The Louisville CoC and KHC. I certify that I have read, understand, and will abide by the policies and procedures, as detailed in this document, as well as accept any measures taken for violation of these practices.

User Signature: _____ **Date:** _____

Print or Type User Name: _____ **Title:** _____

Agency Executive Director Signature: _____ **Date:** _____

Print or Type Executive Director Name: _____

Agency/Organization Name: _____

Address: _____

City _____ **State** _____ **Zip** _____

**2018 HDX Competition Report
PIT Count Data for KY-501 - Louisville-Jefferson County CoC**

Total Population PIT Count Data

	2016 PIT	2017 PIT	2018 PIT
Total Sheltered and Unsheltered Count	1116	1034	926
Emergency Shelter Total	573	524	555
Safe Haven Total	0	0	0
Transitional Housing Total	431	359	218
Total Sheltered Count	1004	883	773
Total Unsheltered Count	112	151	153

Chronically Homeless PIT Counts

	2016 PIT	2017 PIT	2018 PIT
Total Sheltered and Unsheltered Count of Chronically Homeless Persons	186	123	129
Sheltered Count of Chronically Homeless Persons	111	87	108
Unsheltered Count of Chronically Homeless Persons	75	36	21

**2018 HDX Competition Report
PIT Count Data for KY-501 - Louisville-Jefferson County CoC**

Homeless Households with Children PIT Counts

	2016 PIT	2017 PIT	2018 PIT
Total Sheltered and Unsheltered Count of the Number of Homeless Households with Children	100	88	69
Sheltered Count of Homeless Households with Children	99	87	68
Unsheltered Count of Homeless Households with Children	1	1	1

Homeless Veteran PIT Counts

	2011	2016	2017	2018
Total Sheltered and Unsheltered Count of the Number of Homeless Veterans	314	191	166	129
Sheltered Count of Homeless Veterans	303	167	151	115
Unsheltered Count of Homeless Veterans	11	24	15	14

2018 HDX Competition Report
HIC Data for KY-501 - Louisville-Jefferson County CoC

HMIS Bed Coverage Rate				
Project Type	Total Beds in 2018 HIC	Total Beds in 2018 HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ES) Beds	474	101	373	100.00%
Safe Haven (SH) Beds	0	0	0	NA
Transitional Housing (TH) Beds	244	0	208	85.25%
Rapid Re-Housing (RRH) Beds	331	0	331	100.00%
Permanent Supportive Housing (PSH) Beds	1612	0	1610	99.88%
Other Permanent Housing (OPH) Beds	328	0	238	72.56%
Total Beds	2,989	101	2760	95.57%

2018 HDX Competition Report HIC Data for KY-501 - Louisville-Jefferson County CoC

PSH Beds Dedicated to Persons Experiencing Chronic Homelessness

Chronically Homeless Bed Counts	2016 HIC	2017 HIC	2018 HIC
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homeless persons identified on the HIC	597	664	180

Rapid Rehousing (RRH) Units Dedicated to Persons in Household with Children

Households with Children	2016 HIC	2017 HIC	2018 HIC
RRH units available to serve families on the HIC	31	32	85

Rapid Rehousing Beds Dedicated to All Persons

All Household Types	2016 HIC	2017 HIC	2018 HIC
RRH beds available to serve all populations on the HIC	114	123	331

2018 HDX Competition Report FY2017 - Performance Measurement Module (Sys PM) Summary Report for KY-501 - Louisville-Jefferson County CoC

Measure 1: Length of Time Persons Remain Homeless

This measures the number of clients active in the report date range across ES, SH (Metric 1.1) and then ES, SH and TH (Metric 1.2) along with their average and median length of time homeless. This includes time homeless during the report date range as well as prior to the report start date, going back no further than October, 1, 2012.

Metric 1.1: Change in the average and median length of time persons are homeless in ES and SH projects.
Metric 1.2: Change in the average and median length of time persons are homeless in ES, SH, and TH projects.

a. This measure is of the client's entry, exit, and bed night dates strictly as entered in the HIMIS system.

	Universe (Persons)		Average LOT Homeless (bed nights)		Median LOT Homeless (bed nights)	
	Submitted FY 2016	FY 2017	Submitted FY 2016	FY 2017	Submitted FY 2016	FY 2017
1.1 Persons in ES and SH	4046	4017	46	37	13	12
1.2 Persons in ES, SH, and TH	4677	4341	77	64	22	16
					Difference	Difference
					-9	-1
					-13	-6

b. This measure is based on data element 3.17.

This measure includes data from each client's Living Situation (Data Standards element 3.917) response as well as time spent in permanent housing projects between Project Start and Housing Move-In. This information is added to the client's entry date, effectively extending the client's entry date backward in time. This "adjusted entry date" is then used in the calculations just as if it were the client's actual entry date.

The construction of this measure changed, per HUD's specifications, between FY 2016 and FY 2017. HUD is aware that this may impact the change between these two years.

2018 HDX Competition Report FY2017 - Performance Measurement Module (Sys PM)

	Universe (Persons)		Average LOT Homeless (bed nights)			Median LOT Homeless (bed nights)		
	Submitted FY 2016	FY 2017	Submitted FY 2016	FY 2017	Difference	Submitted FY 2016	FY 2017	Difference
1.1 Persons in ES, SH, and PH (prior to "housing move in")	3800	3971	182	247	65	27	30	3
1.2 Persons in ES, SH, TH, and PH (prior to "housing move in")	4556	4416	221	280	59	50	50	0

2018 HDX Competition Report FY2017 - Performance Measurement Module (Sys PM)

Measure 2: The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness

This measures clients who exited SO, ES, TH, SH or PH to a permanent housing destination in the date range two years prior to the report date range. Of those clients, the measure reports on how many of them returned to homelessness as indicated in the HMIS for up to two years after their initial exit.

After entering data, please review and confirm your entries and totals. Some HMIS reports may not list the project types in exactly the same order as they are displayed below.

	Total # of Persons who Exited to a Permanent Housing Destination (2 Years Prior)	Returns to Homelessness in Less than 6 Months		Returns to Homelessness from 6 to 12 Months		Returns to Homelessness from 13 to 24 Months		Number of Returns in 2 Years	
		FY 2017	% of Returns	FY 2017	% of Returns	FY 2017	% of Returns	FY 2017	% of Returns
Exit was from SO	59	8	14%	8	14%	6	10%	22	37%
Exit was from ES	721	165	23%	42	6%	37	5%	244	34%
Exit was from TH	362	45	12%	26	7%	20	6%	91	25%
Exit was from SH	3	0	0%	0	0%	2	67%	2	67%
Exit was from PH	322	28	9%	10	3%	16	5%	54	17%
TOTAL Returns to Homelessness	1467	246	17%	86	6%	81	6%	413	28%

Measure 3: Number of Homeless Persons

Metric 3.1 – Change in PIT Counts

6/28/2018 10:50:40 AM

2018 HDX Competition Report FY2017 - Performance Measurement Module (Sys PM)

This measures the change in PIT counts of sheltered and unsheltered homeless person as reported on the PIT (not from HMIS).

	January 2016 PIT Count	January 2017 PIT Count	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	1116	1034	-82
Emergency Shelter Total	573	524	-49
Safe Haven Total	0	0	0
Transitional Housing Total	431	359	-72
Total Sheltered Count	1004	883	-121
Unsheltered Count	112	151	39

Metric 3.2 – Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

	Submitted FY 2016	FY 2017	Difference
Universe: Unduplicated Total sheltered homeless persons	5169	4875	-294
Emergency Shelter Total	4369	4455	86
Safe Haven Total	0	0	0
Transitional Housing Total	1225	659	-566

2018 HDX Competition Report
FY2017 - Performance Measurement Module (Sys PM)

Measure 4: Employment and Income Growth for Homeless Persons in CoC Program-funded Projects

Metric 4.1 – Change in earned income for adult system stayers during the reporting period

	Submitted FY 2016	FY 2017	Difference
Universe: Number of adults (system stayers)	664	624	-40
Number of adults with increased earned income	39	36	-3
Percentage of adults who increased earned income	6%	6%	0%

Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period

	Submitted FY 2016	FY 2017	Difference
Universe: Number of adults (system stayers)	664	624	-40
Number of adults with increased non-employment cash income	139	162	23
Percentage of adults who increased non-employment cash income	21%	26%	5%

Metric 4.3 – Change in total income for adult system stayers during the reporting period

	Submitted FY 2016	FY 2017	Difference
Universe: Number of adults (system stayers)	664	624	-40
Number of adults with increased total income	164	190	26
Percentage of adults who increased total income	25%	30%	5%

2018 HDX Competition Report FY2017 - Performance Measurement Module (Sys PM)

Metric 4.4 – Change in earned income for adult system leavers

	Submitted FY 2016	FY 2017	Difference
Universe: Number of adults who exited (system leavers)	455	237	-218
Number of adults who exited with increased earned income	62	38	-24
Percentage of adults who increased earned income	14%	16%	2%

Metric 4.5 – Change in non-employment cash income for adult system leavers

	Submitted FY 2016	FY 2017	Difference
Universe: Number of adults who exited (system leavers)	455	237	-218
Number of adults who exited with increased non-employment cash income	60	60	0
Percentage of adults who increased non-employment cash income	13%	25%	12%

Metric 4.6 – Change in total income for adult system leavers

	Submitted FY 2016	FY 2017	Difference
Universe: Number of adults who exited (system leavers)	455	237	-218
Number of adults who exited with increased total income	118	93	-25
Percentage of adults who increased total income	26%	39%	13%

2018 HDX Competition Report FY2017 - Performance Measurement Module (Sys PM)

Measure 5: Number of persons who become homeless for the 1st time

Metric 5.1 – Change in the number of persons entering ES, SH, and TH projects with no prior enrollments in HMIS

	Submitted FY 2016	FY 2017	Difference
Universe: Person with entries into ES, SH or TH during the reporting period.	4706	4498	-208
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	1537	1351	-186
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time)	3169	3147	-22

Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

	Submitted FY 2016	FY 2017	Difference
Universe: Person with entries into ES, SH, TH or PH during the reporting period.	4989	4954	-35
Of persons above, count those who were in ES, SH, TH or any PH within 24 months prior to their entry during the reporting year.	1665	1575	-90
Of persons above, count those who did not have entries in ES, SH, TH or PH in the previous 24 months. (i.e. Number of persons experiencing homelessness for the first time.)	3324	3379	55

2018 HDX Competition Report
FY2017 - Performance Measurement Module (Sys PM)

Measure 6: Homeless Prevention and Housing Placement of Persons defined by category 3 of HUD’s Homeless Definition in CoC Program-funded Projects

This Measure is not applicable to CoCs in FY2017 (Oct 1, 2016 - Sept 30, 2017) reporting period.

Measure 7: Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing

Metric 7a.1 – Change in exits to permanent housing destinations

	Submitted FY 2016	FY 2017	Difference
Universe: Persons who exit Street Outreach	341	414	73
Of persons above, those who exited to temporary & some institutional destinations	192	239	47
Of the persons above, those who exited to permanent housing destinations	47	64	17
% Successful exits	70%	73%	3%

Metric 7b.1 – Change in exits to permanent housing destinations

2018 HDX Competition Report FY2017 - Performance Measurement Module (Sys PM)

	Submitted FY 2016	FY 2017	Difference
Universe: Persons in ES, SH, TH and PH-RRH who exited, plus persons in other PH projects who exited without moving into housing	4203	4414	211
Of the persons above, those who exited to permanent housing destinations	1063	880	-183
% Successful exits	25%	20%	-5%

Metric 7b.2 – Change in exit to or retention of permanent housing

	Submitted FY 2016	FY 2017	Difference
Universe: Persons in all PH projects except PH-RRH	2082	1762	-320
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	1923	1703	-220
% Successful exits/retention	92%	97%	5%

**2018 HDX Competition Report
FY2017 - SysPM Data Quality
KY-501 - Louisville-Jefferson County CoC**

This is a new tab for FY 2016 submissions only. Submission must be performed manually (data cannot be uploaded). Data coverage and quality will allow HUD to better interpret your Sys PM submissions.

Your bed coverage data has been imported from the HIC module. The remainder of the data quality points should be pulled from data quality reports made available by your vendor according to the specifications provided in the HMIS Standard Reporting Terminology Glossary. You may need to run multiple reports into order to get data for each combination of year and project type.

You may enter a note about any field if you wish to provide an explanation about your data quality results. This is not required.

2018 HDX Competition Report FY2017 - SysPM Data Quality

	All ES, SH			All TH			All PSH, OPH			All RRH			All Street Outreach			
	2013-2014	2014-2015	2015-2016	2016-2017	2013-2014	2014-2015	2015-2016	2016-2017	2013-2014	2014-2015	2015-2016	2016-2017	2013-2014	2014-2015	2015-2016	2016-2017
1. Number of non-DV Beds on HIC	520	521	453	407	552	497	425	406	1577	1785	1832	1952	55	62	82	119
2. Number of HMIS Beds	520	521	453	407	552	497	420	402	1235	1399	1401	1467	55	62	82	119
3. HMIS Participation Rate from HIC (%)	100.00	100.00	100.00	100.00	100.00	100.00	98.82	99.01	78.31	78.38	76.47	75.15	100.00	100.00	100.00	100.00
4. Unduplicated Persons Served (HMIS)	5838	5222	4362	4151	1300	1120	1225	573	1614	1753	1777	1866	141	347	397	239
5. Total Leavers (HMIS)	5423	4837	3970	3795	860	753	752	370	249	341	360	398	90	170	286	96
6. Destination of Don't Know, Refused, or Missing (HMIS)	3741	2628	2154	1853	47	61	41	27	6	6	21	13	1	30	2	8
7. Destination Error Rate (%)	68.98	54.33	54.26	48.83	5.47	8.10	5.45	7.30	2.41	1.76	5.83	3.27	1.11	17.65	0.70	8.33
													1.22	0.00	0.00	0.24

**2018 HDX Competition Report
 Submission and Count Dates for KY-501 - Louisville-Jefferson County
 CoC**

Date of PIT Count

	Date	Received HUD Waiver
Date CoC Conducted 2018 PIT Count	1/24/2018	

Report Submission Date in HDX

	Submitted On	Met Deadline
2018 PIT Count Submittal Date	4/30/2018	Yes
2018 HIC Count Submittal Date	4/30/2018	Yes
2017 System PM Submittal Date	5/31/2018	Yes

KY 501 Louisville/Jefferson, Co. KY Continuum of Care Policies and Procedures

1 In 1987, Congress passed the first federal law specifically addressing homelessness. The Stewart
2 B. McKinney Homeless Assistance Act of 1987, later renamed the McKinney-Vento Homeless
3 Assistance Act, provides federal financial support for a variety of programs to meet the many
4 needs of individuals and families who are homeless. The housing programs it authorizes are
5 administered by the Department of Housing and Urban Development's (HUD) Office of Special
6 Needs Assistance Programs (SNAPS). Since 1994, HUD has required each community to come
7 together to submit a single comprehensive Continuum of Care (CoC) application rather than
8 allowing applications from individual providers in the community. HUD's intent in creating this
9 structured application process was to stimulate community-wide planning and coordination of
10 programs for individuals and families who are homeless. (HUD's Homeless Assistance Programs: Continuum of Care
11 101, June, 2009)
12

13 In 2009, the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of
14 2009 was signed into law. The HEARTH Act amends and reauthorizes the McKinney-Vento
15 Homeless Assistance Act with several substantial changes. Traditional beliefs around what is
16 most effective in addressing homelessness have been evaluated and there are aggressive
17 expectations for programs to move people into permanent housing as soon as possible. The task
18 of keeping people in permanent housing is also receiving new attention with goals addressing
19 recidivism and length of stay in permanent housing.
20

21 The KY-501 Louisville/Jefferson, Co. KY Continuum of Care (hereafter referred to as the Louisville
22 Metro CoC) is participating in the nationwide effort to evaluate and improve homeless service
23 provision. The Louisville Metro CoC takes seriously the HUD mandates and seeks to incorporate
24 them in ways that make sense for this community at this time in history. To that end, the
25 Louisville Metro CoC seeks to establish its governance, its policies and its procedures to not only
26 align with HUD's expectations but to create a service provision system that first and foremost
27 provides appropriate services to those who find themselves homeless and assists them in
28 permanently moving out of homelessness. It is the intent of the Louisville Metro CoC to create
29 an understanding of the reality of homeless in Louisville Metro and encourage a community wide
30 response to reducing and eliminating it.
31

32 **Louisville Metro Continuum of Care (CoC) Geographic Area**

- 33 • The Louisville Metro CoC geographic area is defined as Louisville Metro with the six-digit
34 code of 211374. This area includes all of Jefferson County, KY.
35

36 **Louisville Metro CoC Values, Priorities and Goals**

37 Louisville Metro CoC Values

- 38 • We value programs with outcomes that demonstrate progress toward reducing and
39 ending homelessness as quickly as possible with an ultimate goal of no more than 30 days.
- 40 • We value innovative and diverse programming that addresses gaps in community
41 services.
- 42 • We value quality programming that is accountable to the community through outcomes
43 measurement.

KY 501 Louisville/Jefferson, Co. KY Continuum of Care Policies and Procedures

- 1 • We value the effort to access the maximum amount of funding available to the Louisville
2 Metro area.
- 3 • We value the commitment to serve all people who are in need of assistance regardless of
4 race, gender, age, national origin, sexual orientation, gender identity and class and to be
5 in compliance with all applicable laws regarding program accessibility for all people.
- 6 • We value and respect the decisions and choices of those who find themselves homeless
7 and seek to optimize self-sufficiency.
- 8

9 Louisville Metro CoC Priorities

- 10 • Moving people and families out of homeless is our number one priority.
- 11 • Provide safe shelter to those in need who choose to use the shelter system.
- 12 • Provide timely assistance to those seeking to move out of homelessness regardless of
13 shelter use or choice.
- 14 • Make all available services accessible to those who find themselves homeless.
- 15 • There is a comprehensive and holistic approach to identifying and providing services to
16 assist those who find themselves homeless before, during and after moving to permanent
17 housing.
- 18 • The goals and objectives of those whose funding is used to provide shelter and services
19 are respected.
- 20 • There is a focused effort to refer and connect those who find themselves homeless to
21 mainstream services outside the homeless provider system.
- 22 • Providers seek choice, safety, affordability, integration, accessibility and supports when
23 helping clients' access permanent housing.
- 24 • Provide prevention and diversion services to assist families and individuals from becoming
25 homeless and to divert families and individuals from entering the shelter system
- 26

27 Louisville Metro CoC Goals

28 The goals of the Louisville Metro CoC are fully stated in the "Blueprint to End Homelessness"
29 (Louisville Plan to End Homelessness) and include the following goals that directly tie to the
30 goals of the HEARTH Act and the Louisville Metro Consolidated Plan.

- 31 • Increase Leadership, Collaboration and Civic Engagement
- 32 • Increase Access to Stable and Affordable Housing
- 33 • Increase Economic Security
- 34 • Increase Health and Stability
- 35 • Retool Crisis Response
- 36

37 The specific actions to reach these goals include the following:

- 38 • To divert people and families from the experience of homelessness.
 - 39 ○ Whenever possible, those who present themselves to the single point of entry will
40 be diverted from the homeless provider system.
- 41 • To move people and families out of homelessness.

KY 501 Louisville/Jefferson, Co. KY Continuum of Care Policies and Procedures

- 1 ○ New clients to the homeless service system will exit emergency shelter on average
- 2 in 6 months and transitional housing on average in 12 months.
- 3 ○ 80% of those who enter the Rapid Re-housing program will not re-enter the
- 4 homeless provider system within 6 months of the end of their Rapid Re-housing
- 5 assistance.
- 6 ○ 80% of those who enter transitional housing programs will move to permanent
- 7 housing.
- 8 ○ 80% of those placed in permanent housing will remain there for 12 months or
- 9 longer.
- 10 ● HMIS data will be used to determine the outcomes of individual projects and the CoC as
- 11 a whole.
- 12 ○ 90% of shelter beds will be entered into HMIS.
- 13 ○ 30% of those entered in HMIS will have an exit destination.
- 14

15 **Louisville Metro CoC Full Membership**

16 At the center of the Louisville Metro CoC process is the CoC full membership made up of nonprofit
17 agencies, individuals, private businesses and government representatives at all levels. It is the
18 body that ultimately holds the responsibility for making the decisions regarding the process and
19 the final submission of the CoC grant as well as setting benchmarks to monitor both CoC and ESG
20 Programs. The Louisville Metro CoC full membership has found that by working together the
21 final product is one that the whole community can embrace and to which it can be committed.

22 Full Membership Responsibilities

23 The Louisville Metro Full Membership is made up of agencies who serve the homeless population,
24 agencies who serve those who are at risk of homelessness, governmental departments charged
25 with addressing homelessness and individuals who are interested in addressing the issue of
26 homelessness in the Louisville Metro community. The full membership body is responsible for:

- 27 ● Electing new CoC Board Members;
- 28 ● Providing information and advice to the CoC Board regarding best practices in homeless
- 29 services,
- 30 ● Appointing the Collaborative Applicant (The Coalition for the Homeless)
- 31 ● Appointing the HMIS Lead agency (The Coalition for the Homeless)
- 32 ● Striving to provide the best services to each of the community's specific homeless
- 33 populations,
- 34 ● Working within the CoC homeless provider system to provide comprehensive and
- 35 appropriate services to move homeless persons as quickly and appropriately as possible,
- 36 ● Participating on CoC Committees and in monthly full membership meetings,
- 37 ● Establishing the process of Board selection,
- 38
- 39

40 Full Membership and Voting Rights

41 The CoC community holds the responsibility of endorsing Board membership, deciding the needs
42 of the community and how the process for funding consideration is to be administered.

43

KY 501 Louisville/Jefferson, Co. KY Continuum of Care Policies and Procedures

1 It is the policy of the Louisville Metro CoC that each CoC member/agency:

- 2 • Holds one vote,
- 3 • Designates a delegate and an alternate who are authorized to cast the agency vote when
- 4 such action is needed,
- 5 • Is allowed to send more than these designated people to the CoC community meetings
- 6 but when a vote is taken, only the delegate or alternate is eligible to cast a vote,
- 7 i) Is required to send a representative to at least 10 out of the last 12 community
- 8 meetings prior to the vote in order to be eligible to cast a vote, including projects to
- 9 be submitted in the HUD CoC application or the election and approval of CoC Board
- 10 Members;
- 11 ○ If an agency is unable to send either the delegate or alternate, that agency may
- 12 send a representative to the meeting and receive credit for attendance.
- 13 However, only a delegate or alternate has the right to vote on any issue, unless
- 14 this person is approved by the CoC coordinator in advance of the meeting.
- 15 ○ If an agency has not been a member of the CoC for a full twelve months at the
- 16 time of a vote, the number of absences allowed that agency will be proportional
- 17 to the number of months they have been a member of the CoC.
- 18 • Is not eligible to vote on any issue regarding a project where that agency/member has a
- 19 financial interest or serves the project's agency in any capacity, and
- 20 • Has the right to submit new and renewal proposals within the guidelines and
- 21 specifications of the U.S. Dept. of Housing and Urban Development. (The Board has the
- 22 responsibility to decide which projects are to be included in the CoC application.)
- 23

24 The CoC community voting procedure may be carried out within a CoC meeting of the members

25 or through other means (email, U.S. Postal Service, FAX) as long as each completed ballot is:

- 26 • Designated for an eligible voting member (agency), and
- 27 • The ballot contains the signature of the CoC delegate or alternate.
- 28

29 According to HUD requirements, the membership of the Louisville Metro CoC must be inclusive

30 of the many facets of the community which it represents. The Louisville Metro CoC membership

31 consists of over 80 entities representing:

- 32 • The Public Sector
 - 33 ○ State government agencies
 - 34 ○ Local government agencies
 - 35 ○ Public housing agencies
 - 36 ○ School systems and universities
 - 37 ○ Law enforcement and corrections
 - 38 ○ Local Workforce Investment Act boards
 - 39 ○ Other state and national level groups and persons
- 40 • The Private Sector
 - 41 ○ Non-Profit organizations
 - 42 ○ Faith-Based organizations
 - 43 ○ Funders and advocacy groups

KY 501 Louisville/Jefferson, Co. KY Continuum of Care Policies and Procedures

- 1 ○ Businesses including banks, developers and business associations
- 2 ○ Hospitals and medical representatives
- 3 ○ Homeless persons
- 4

5 Each member entity of the continuum holds the right to cast one vote per question. This means
6 that entities sending more than one representative to the community meetings are restricted to
7 casting one vote per question. Individuals representing themselves also have the right to cast one
8 vote per question. A delegate and an alternate are designated by the participating entity at the
9 beginning of the continuum year (July).

10
11 Other responsibilities of member agencies include:

- 12 • Demonstrating the ability and willingness to work with others in the community by
13 collaborating with agencies to provide services,
- 14 • Providing documentation of homelessness and other required information to other
15 member agencies in order to facilitate a seamless provision of care, and (This is expected
16 to be done with the understanding that the person seeking assistance has granted a
17 release of the information.)
- 18 • Fully participating in the Louisville Metro Homeless Management Information System
19 (HMIS).
- 20

21 Responsibilities of the Delegate and Alternate

22 Each member entity of the Louisville Metro CoC full membership designates a delegate and
23 alternate at the beginning of the continuum year (July). Their responsibilities include:

- 24 • Attendance at CoC community meetings: Each entity must have a representative present
25 at community meetings in order to cast a ballot regarding submission of projects to HUD
26 for funding. (See Attendance Policy) This is to insure that when questions come up for a
27 vote, those voting are fully informed of the circumstances and ramifications of the
28 question.
- 29 • Sharing information with agency directors and staff: it is the responsibility of the delegate
30 and alternate to share all relevant CoC information with agency Director and necessary
31 staff so the best decisions are made in terms of continuum votes and applications.
32 Information shared by the CoC Coordinator at the CoC monthly meetings is critical when
33 making important funding decisions.
- 34 • Representing the interests of their member agency while considering the needs of the
35 community as a whole: It is important that those representing member entities represent
36 the interests of those entities. It is the responsibility of the delegate and alternate to put
37 aside personal preferences and goals in order to truly represent their entity. It is also
38 important for the delegate and alternate to be able to examine the needs of the
39 community as a whole. When casting a vote on a particular question it is sometimes
40 necessary to cast the vote for the good of the community putting aside the immediate
41 need of the entity the person is representing. This is a delicate balance requiring insight
42 and good judgment.
- 43

KY 501 Louisville/Jefferson, Co. KY Continuum of Care Policies and Procedures

Attendance Policy

The Louisville Metro Continuum of Care full membership values the input and participation of a wide range of community volunteers, agencies, civic organizations, business partners and government officials. The Louisville Metro CoC full membership also believes that in order to insure the most informed and objective decisions regarding homeless issues and funding it is necessary that voting members of the CoC make every effort to attend the monthly CoC meetings. Therefore, the following policy has been adopted:

- Each voting entity will designate a delegate and alternate for the purpose of voting.
- The delegate or alternate must attend 10 out of the last 12 monthly meetings prior to a vote being taken.
- In case of emergency, a third person representing the agency can be sent as a note taker to a meeting but this person does not have the right to cast a ballot unless this person is approved by the CoC coordinator in advance of the meeting.
- There will be some meetings that require mandatory attendance of the delegate or alternate.
- Delegates and alternates will be notified of mandatory meetings by the Coalition staff.
- Voting entities that fail to have a delegate, alternate or, in case of an emergency, a third person to act as a note taker at 10 of the last 12 monthly meetings prior to a vote and/or fails to have the same representing the entity at the mandatory meetings will not be able to cast a ballot regarding projects to be submitted in the U.S. Dept. of Housing and Urban Development CoC application or the election and approval of CoC Board Members.

Louisville Metro CoC Board

To carry out the primary purpose of the CoC Program, HUD requires representatives of relevant organizations (e.g., nonprofit organizations, victim services providers, local governments) to form a CoC to serve a specific geographic area. In addition, each CoC must establish a board to act on its behalf, and the CoC may appoint additional committees or workgroups to fulfill its responsibilities. (Introductory Guide to the CoC Program, HUD, July 2012)

Governance Charter

A Governance Charter outlining the roles and responsibilities of the Louisville Metro CoC Board, Full Membership, HMIS Administrator, Collaborative Applicant, and Agency Members must be updated and signed by the CoC board prior to the submission of the Louisville Metro CoC application each year.

Role of the Board

It is the responsibility of the Louisville Metro CoC Board to:

- Design, operate and follow a collaborative process for developing the application and approving its submission,
- Establish priorities for funding projects in the CoC geographic area,
- Review the monitoring of all providers and determine appropriate action when benchmarks are not met,

KY 501 Louisville/Jefferson, Co. KY Continuum of Care Policies and Procedures

- 1 • Provide a vision, priorities and goals for the CoC community,
- 2 • Establish a process for funding recommendations through HUD and other funding
- 3 streams available in the community and insure that all discussion on review and ranking
- 4 procedures are reflected in the minutes and posted for community review,
- 5 • Oversee progress of HMIS entry, common assessment and single point of entry and make
- 6 recommendations for improvement.
- 7 • Establish monitoring standards and outcomes and provide oversight of the
- 8 implementation of this monitoring through the city and CoC,
- 9 • Approve and rank projects to be included in the community CoC application and insure
- 10 that all discussion on review and ranking procedures are reflected in the minutes,
- 11 • Develop and follow a governance charter detailing the responsibilities of all parties,
- 12 • Consult with recipients and sub recipients to establish performance targets appropriate
- 13 for population and program type, monitoring the performance of recipients and sub
- 14 recipients, evaluating outcomes, and taking action against poor performers,
- 15

16 Louisville Metro CoC Board Composition

17 The Louisville Metro CoC Board is made up of no less than 15 and no more than 21 voting
18 members and will include:

- 19 a. Board members elected by the CoC membership from the CoC membership or larger
- 20 community. The elected members must:
 - 21 i. Include at least one homeless or formerly homeless individual
- 22 b. Represent the relevant organizations and projects serving homeless subpopulations
- 23 including:
 - 24 i. Persons with substance use disorders,
 - 25 ii. Persons with HIV/AIDs,
 - 26 iii. Veterans,
 - 27 iv. The chronically homeless,
 - 28 v. Families with children,
 - 29 vi. Unaccompanied youth,
 - 30 vii. The seriously mentally ill,
 - 31 viii. Victims of domestic violence, dating violence, sexual assault and stalking
- 32 c. Include a member
 - 33 i. representing the Emergency Solutions Grants program (ESG) recipient's
 - 34 agency
 - 35 ii. representing the Veterans Administration
 - 36 iii. representing the state (Kentucky Housing Corporation)
 - 37 iv. representing Louisville Metro Gov't (ESG recipient)
 - 38 v. representing the Youth Action Board (YAB)
- 39 d. It should always have an odd number of members;
- 40 e. A representative of the Collaborative Applicant will attend all board meetings and
- 41 may participate in discussions, but is not considered a member of the board
- 42 and holds no vote.

KY 501 Louisville/Jefferson, Co. KY Continuum of Care Policies and Procedures

Quorum and Manner of Acting

- In order to do binding business, there must be a quorum of at least 51% present for a Board vote.
- The Board will elect its own Chairperson, Secretary and any other roles as seen fit by the Board.
- Only one person per agency may serve on the Board at any given time and provider agencies represented on the Board can have a proposal on the table although they may not vote on these issues.

Qualities and Skills of the Louisville Metro CoC Board

In order to carry out the role and function of the CoC Board, it is recommended that the following qualities and skills be represented within the Board.

- The ability to remain open and flexible to the needs of the service providers, the regulations presented by HUD, the needs and wishes of the CoC full membership and the needs of the homeless population.
- The ability to consider conflicting needs and come to resolution in the best interest of the CoC full membership.
- The ability to understand and evaluate a budget.
- The ability to understand and evaluate program outcomes in relation to the Louisville Metro community and HUD guidance.
- The ability to see and understand the “big picture”.

Code of Conduct

The Louisville Metro CoC submits a Code of Conduct annually through the CoC application which should be voted on and followed by the full membership. It includes:

- **Conflict of Interest**

All members of the CoC Board are required to sign a conflict of interest form stating their association with agencies and projects that can reasonably be expected to apply for and/or receive funding through the CoC process. All associations will be made public to the full membership prior to any process that will determine funding recipients. Members with a conflict of interest are expected to recuse themselves from discussions and decisions where there is a real or perceived conflict of interest.

- **Confidentiality**

Information contained in the ESG and CoC applications and reports is considered proprietary and confidential and may not be released to any person or party without approval of that applicant agency.

Any client information shared within the CoC is also confidential and should not be released to any other entity without a release of information signed by the client.

KY 501 Louisville/Jefferson, Co. KY Continuum of Care Policies and Procedures

1 **Louisville Metro CoC Committees**

2 The Louisville Metro CoC Full Membership may see fit to create new committees to conduct the
3 work of the Louisville Metro CoC at any time. At this time, the following CoC Committees have
4 been established:
5

6 1. Institutional Discharge/ Homeless Prevention

7 The Institutional Discharge Committee meets quarterly to discuss ways to improve the
8 discharge planning from state and local institutions including prisons, jails, mental hospitals and
9 institutions, hospitals and foster care. The committee is open to all and includes
10 representatives of these institutions as well as staff who participate in the homeless prevention
11 program which serves those exiting state institutions.
12

13 2. Consumer Participation

14 The Consumer Participation Task Force meets bi-monthly to seek input from clients of homeless
15 services. The committee is open to anyone but includes four volunteers representing ESG and
16 CoC funded projects and two persons with no conflict of interest. Information is gathered from
17 forums held over the course of the year and annually at the Project Connect/Stand Down
18 where all people who are experiencing homelessness are invited to receive services at a one
19 stop shop offered over the course of a full day.
20

21 3. Accessing Mainstream Benefits

22 The Accessing Mainstream Benefits Committee meets monthly to identify and examine services
23 within the mainstream that assist with issues faced by those who are homeless.
24

25 4. Coalition Supporting Young Adults

26 This committee is made up of agencies that serve 16-24 year olds in crisis without support
27 throughout the city. Its role is to make recommendations to lower the number of young adults
28 in crisis and prevent the cycle of homelessness in the next generation.
29

30 5. Coordinated Entry Steering Committee

31 The Coordinated Entry Steering Committee meets as needed to create and oversee the
32 Louisville Metro CoC Coordinated Entry. The Steering Committee assists the Coordinated Entry
33 project to provide and coordinate appropriate services to those seeking prevention, diversion,
34 shelter and permanent housing.
35

36 6. Homeless Youth Committee

37 The Homeless Youth Committee seeks to create partnerships between agencies, projects, civic
38 groups, government agencies, private entities and individuals interested in addressing the
39 needs of homeless youth. These partnerships identify new ways of working together to break
40 down barriers faced by homeless youth.
41

42 7. Youth Action Board

43 The Youth Action Board is made up of youth age 18 – 26 where the majority of members are
44 homeless or formerly homeless. It is charged with assisting the CoC and the Homeless Youth

KY 501 Louisville/Jefferson, Co. KY Continuum of Care Policies and Procedures

1 Committee in addressing issues faced by homeless youth. The Board also takes on specific
2 projects that would help homeless youth navigate the homeless provider system.
3

4 8. Rapid Rehousing Providers Committee

5 This group works together to exchange ideas and processes in order to better serve the people
6 Rapid Rehousing serves.
7

8 9. HMIS User Group

9 The HMIS User Group meets quarterly before the full membership meeting to discuss changes
10 and issues with the Louisville Metro CoC HMIS system. The committee is open to all but is
11 made up primarily of those who enter HMIS data at each of the homeless service agencies.
12

13 10. The Mayor's Homeless Encampment Task Force By-Name Subcommittee

14 This committee works with a by-name list to house people living on the streets as quickly as
15 possible. This is done through case conferencing involving outreach teams, day center,
16 Healthcare for the Homeless, agencies receiving CABHI funds and The Coalition for the
17 Homeless.
18

19 11. Move Up Committee

20 The Move Up Committee solicits and reviews applications for move up Section 8 vouchers
21 provided by the Louisville Metro Housing Authority. After review, the committee chooses the
22 applicants for the vouchers and informs the appropriate case manager. It also monitors when
23 vouchers become available and solicits more vouchers from Louisville Metro Housing Authority.
24

25 12. Ad hoc committees are created as needed.
26

27 **Louisville Metro CoC Collaborative Applicant**

28 Role of the Collaborative Applicant

29 It is the responsibility of the Louisville Metro CoC full membership to designate a collaborative
30 applicant best able to insure a successful submission of the CoC proposal. It is the role of the
31 Collaborative Applicant to:

- 32 • Complete the electronic application in response to HUD's annual CoC Program NOFA for
33 homeless assistance resources,
- 34 • Present a timeline and deadlines to all project applicants for individual project plans,
- 35 • Collect all data and submit a renewal chart to HUD of all projects planning to reapply,
- 36 • Create the housing inventory chart,
- 37 • Create the grant inventory worksheet,
- 38 • Establish priorities in conjunction with the CoC membership for funding projects in the
39 CoC geographic area,
- 40 • Create process for ranking applications under the direction of the CoC membership and
41 Board,
- 42 • Oversee committees and volunteers,
- 43 • Create agendas for CoC full membership and Board meetings in collaboration with the
44 Board Chair,

KY 501 Louisville/Jefferson, Co. KY Continuum of Care Policies and Procedures

- 1 • Notify the general public of the opportunity to join the CoC annually,
- 2 • Monitor who in the CoC membership is eligible to vote,
- 3 • Work and collaborate with the local ESG recipient (Louisville Metro Government) to
- 4 establish priorities and funding decisions.
- 5 • Evaluate and report to HUD outcomes of ESG and CoC projects and consult with ESG and
- 6 CoC applicants regarding allocations,
- 7 • Establish and provide oversight of a coordinated assessment system and single point of
- 8 entry,
- 9 • Conduct a Point-in-Time count of homeless persons, at least biennially,
- 10 • Conduct an annual gaps analysis, and
- 11 • Provide information required to complete the Consolidated Plan.
- 12

13 **The Louisville Blueprint to End Homelessness**

14 History

15 In 2000, members of the Coalition for the Homeless began work on a plan entitled “Reducing and
16 Ending Homelessness: A Blueprint for the Future.” This report was released in 2002 and outlined
17 ten goals with action steps for eliminating homelessness in Jefferson County, Kentucky. In 2007,
18 the Coalition for the Homeless joined forces with Louisville Metro’s Office on Homelessness to
19 update the plan. It was updated again in 2012 to include the newly established federal policies
20 in the federal “Opening Doors” Plan.

22 Louisville Metro CoC Blueprint Priorities

- 23 • Increase Leadership, Collaboration and Civic Engagement
- 24 • Increase Access to Stable and Affordable Housing
- 25 • Increase Economic Security
- 26 • Increase Health and Stability
- 27 • Retool Crisis Response
- 28

29 The full plan with specific goals is available at The Coalition for the Homeless website –
30 www.louhomeless.org.

32 Update Process

33 Each year, The Coalition for the Homeless documents progress made on each of the “Blueprint”
34 goals and presents to the Louisville Metro CoC full membership as an annual report. These
35 numbers are also included in the CoC application for funding.

37 **Annual Point in Time/Quarterly Shelter Point in Time/Census**

38 The Louisville CoC conducts its annual point in time on the last Wednesday of January. This point
39 in time count includes both a shelter count and a street count. The Louisville CoC also conducts
40 a quarterly point in time on the last Wednesday of the first month of each quarter. (January,
41 April, July and October). The April, July and October quarterly point in time counts are limited to
42 those using the shelter system. During the quarterly point in time counts, shelter bed and unit

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1 counts are also conducted. HMIS data is used to determine information needed to account for
2 sub populations. This information is extrapolated to the persons staying on the streets that night.

3 4 Street Count

5 As required by the U.S. Department of Housing and Urban Development, The Coalition for the
6 Homeless conducts a one-day, point-in-time count of homeless persons the last week of January
7 each year. The Coalition solicits local volunteers to count homeless persons on the streets.
8 Meanwhile, night shelters complete manual counts at their facilities.

9
10 The Coalition for the Homeless uses HMIS data to extrapolate characteristics of the homeless in
11 order to gain a better understanding of who is homeless on a given night in Louisville Metro.

12 13 Homeless Census

14 In addition to the one-day count, The Coalition for the Homeless collects information on all
15 persons served in the Louisville Metro homeless system in a given year. This information is
16 gathered through the HMIS data provided by agencies and through the new single point of entry.

17
18 Each year, the Point-In-Time and Annual Homeless Census information is released to the public
19 and media. The Coalition for the Homeless also studies this information to determine what
20 changes could improve the CoC.

21 22 **Homeless Management Information System (HMIS) and Single Point of Entry**

23 HMIS Roles and Requirements

24 Uniform, longitudinal data is necessary to understand the extent and scope of homelessness in
25 individual communities and across the country. It provides the community with a tool to collect
26 and analyze ongoing data on people using homeless service programs. Accurately calculating the
27 size and needs of the homeless population as well as the outcomes of specific interventions
28 provides a means for tracking service and demand for homeless programs and understanding
29 where improvements need to be made.

30
31 The Louisville Metro CoC chose The Coalition for the Homeless to serve as the administrator
32 (Lead) of the U.S. Department of Housing and Urban Development (HUD) mandated HMIS for
33 Louisville Metro. The Louisville Metro CoC is part of a state-wide HMIS system, called Kentucky
34 HMIS. KYHMIS is managed by the Kentucky Housing Corporation in Frankfort, KY and uses
35 Servicepoint software.

36
37 The Coalition for the Homeless manages the Louisville Metro CoC HMIS through a full-time HMIS
38 Coordinator. This staff salary and the expenses of the HMIS system, including Servicepoint
39 software licenses for Coalition agency members, are paid for through a HUD CoC HMIS grant and
40 match funds raised locally. The HMIS Coordinator reviews the licenses each year to determine
41 which have been unused and recaptures those licenses. Each CoC agency member can purchase
42 one license per program at half price. Additional licenses are full price. Agencies are charged for
43 these licenses annually. Small homeless agencies with no federal funding can receive one free
44 license per year.

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1 The CoC HMIS administrator is responsible for:

- 2 1. Maintaining compliance with the latest HMIS Data and Technical standards published by
- 3 HUD,
- 4 2. Accurately calculating the size and needs of the homeless population,
- 5 3. Tracking service and demand for homeless programs and understanding where
- 6 improvements need to be made,
- 7 4. Overseeing the reporting process for the CoC,
- 8 5. Training agencies on accurate HMIS entry,
- 9 6. Reviewing the licenses of member agencies each year to determine which have been unused
- 10 and recapture as needed,
- 11 7. Coordinating a single point of entry to insure new clients are eligible for services and entered
- 12 correctly,
- 13 8. Reporting as necessary to various entities such as Louisville Metro Government, the Kentucky
- 14 Housing Corporation, the U.S. Department of Housing and Urban Development, etc.
- 15

16 Kentucky Housing Corporation assigns a security officer to oversee all security issues related to
17 the Kentucky HMIS. Anyone with concerns should immediately contact the security officer. Also,
18 the HMIS Coordinator performs an annual check on the Louisville Metro HMIS to insure that all
19 security standards are being met.
20

21 Single Point of Entry

22 The Louisville Metro CoC requires universal data elements be collected on each new CoC client.
23 This information is collected by The Coalition for the Homeless through the single point of entry.
24 This information can be collected by phone or in person at the single point of entry office. The
25 client is asked to sign a release of information and these data elements are made available to all
26 HMIS users. It is also the responsibility of the CoC single point of entry staff to:

- 27 • Record numbers of those they serve daily,
- 28 • Evaluate eligibility for homeless assistance programs,
- 29 • Divert anyone who is appropriate to homeless prevention services versus shelter,
- 30 • Reserve a bed in a local shelter for anyone who qualifies,
- 31 • Make a referral for shelter overflow if no beds are available, and
- 32 • Create a scan card for all newly entered clients that facilitates entry into homeless
33 services.
34

35 Once a client arrives for services at a homeless service agency after the single point of entry
36 assessment, HMIS allows the agency to see if the client was already entered for prior services so
37 they do not duplicate entry. The service provider is responsible for updated HMIS when new
38 services are provided to a client, when their income or housing changes, once a year for an annual
39 update and at program exit. A privacy notice is given to clients and posted at shelters informing
40 them that their data will be entered in HMIS. It also specifies the data protection standards that
41 are to be followed. If a client arrives at a shelter after hours and has not presented at the single
42 point of entry, they should not be denied services if a bed is available. Instead, they can complete

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1 a hard copy form for entry. The agency forwards the form to The Coalition for the Homeless the
2 following day for HMIS entry and refers the client when appropriate to get a scan card.
3

4 HMIS Technical Assistance and Training

5 The Coalition maintains an HMIS help desk through Outlook. When a request for assistance is
6 received, it is automatically logged in the system. When the concern is addressed, this is logged
7 by The Coalition for the Homeless staff for future tracking of technical assistance.
8

9 The Coalition provides individualized, on-site technical support to member agencies as needed.
10

11 The HMIS Coordinator discusses HMIS changes with agency members at Louisville Metro HMIS
12 User Group meeting and/or at CoC full membership meetings.
13

14 HMIS Quality Monitoring

15 During the time of the quarterly point in time counts two HMIS data quality processes are
16 conducted.

- 17 • Agencies are expected to submit a manual count of the persons staying in each homeless
18 program along with a manual count of the beds and units available on that particular
19 night.
- 20 • A one-night point in time report is also run from HMIS by the agency and compared to
21 the manual count. Any discrepancies in the numbers should be resolved before the
22 reports are submitted to The Coalition for the Homeless.
- 23 • The combined information of number of available beds/units and the manual count of
24 persons staying in the shelter is compared to establish a project's capacity rating for that
25 night.
- 26 • The victim service provider (The Center for Women and Families) participates in this
27 process, completing the manual count and running a report from their comparable data
28 base. No identifying information is expected or shared.
29

30 Minimum Data Sets and Data Quality

31 The Coalition for the Homeless manages the HMIS database in Louisville Metro and works with
32 the CoC Board to establish minimum data sets for data quality (DQ) standards. Data Quality is
33 checked once each quarter to coincide with the Point in Time dates.
34

35 Data quality standards

36 There are two parts to Louisville data quality standards: data quality and data accuracy.
37 For data quality, the program must have the minimum data sets entered for each client at exit.
38 For the data accuracy standard, the client and household counts in HMIS must equal the hand
39 counts submitted by the agency quarterly. While the data quality is inspected quarterly, it is the
40 expectation of the Louisville Metro CoC that each agency will update all clients including program
41 exits within a week.
42

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1 The Department of Housing and Urban Development requires all HMIS systems, including victim
2 service provider comparable databases to adhere to the latest Data Quality Standards published
3 by HUD.
4

5 **Housing Inventory Chart**

6 It is the policy of the Louisville Metro CoC that the following guidelines and requirements be met
7 in order for agencies and programs serving the homeless in the Louisville Metro community to
8 be included in the U.S. Department of Housing and Urban Development’s Housing Inventory
9 Chart. This chart is meant to include all facilities and programs that provide sleeping
10 accommodations to the homeless residing in the Louisville Metro CoC community regardless of
11 whether HUD funding is received or used.
12

13 This chart is updated on a yearly basis at the time of the official HUD required Point in Time
14 homeless count. The U.S. Department of Housing and Urban Development requires that local
15 continuums conduct a point in time count bi-annually during the last week of January. The
16 Louisville Metro CoC has elected to conduct the local point in time homeless count on a yearly
17 basis. The annual count takes place on the last Wednesday of January and includes both those
18 staying in shelter and those staying on the street.
19

20 Because HUD uses this chart to determine the capacity to serve the homeless, it is extremely
21 important that facilities be identified as:

- 22 • serving only persons who meet the HUD definition of homeless or
- 23 • if only a portion of the facility’s accommodations are provided to persons meeting the
24 HUD homeless definition, only those accommodations actually providing service to
25 persons meeting the HUD homeless definition be included in the Housing Inventory Chart.
26

27 The U.S. Department of Housing and Urban Development definition for homeless persons is as
28 follows.
29

- 30 • A person or family is considered to be homeless **ONLY** when he/she meets one or more
31 of the categories below.

Category 1	Literally Homeless	
		1. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: <ol style="list-style-type: none"> a. Has a primary nighttime residence that is a public or private place not meant for human habitation; b. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs: OR

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		<p>c. Is exiting an institution where (s)he has resided for 90 days or less AND who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.</p>
Category 2	Imminent Risk of Homelessness	<p>2. Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <p>a. Residence will be lost within 14 days of the date of application for homeless assistance;</p> <p>b. No subsequent residence has been identified; AND</p> <p>c. The individual or family lacks the resources or support networks needed to obtain other permanent housing.</p>
Category 3	<p>Homeless under other Federal statutes</p> <p>The Louisville Metro CoC has chosen NOT to recognize this category at this time.</p>	<p>3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <p>a. Are defined as homeless under the other listed federal statutes;</p> <p>b. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;</p> <p>c. Have experienced persistent instability as measured by two moves or more during the preceding 60 days; AND</p> <p>d. Can be expected to continue in such status for an extended period of time due to special needs or barriers.</p>
Category 4	Fleeing/Attempting to Flee Domestic Violence	<p>4. Any individual or family who:</p> <p>a. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, and or other dangerous or life-threatening conditions that relate to violence against the individual or a family member;</p> <p>b. Has no other residence; AND</p>

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		c. Lacks the resources or support networks to obtain other permanent housing.
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Facilities listed on the Housing Inventory Chart are expected to maintain the following:

- A current license for serving homeless persons issued by Louisville Metro Government.
 - In the case where the Director of the Louisville Metro Department of Codes and Regulations deems it more appropriate for the facility to obtain a conditional use permit in place of the license, such a permit will meet the need for a license.
- Only those beds/units designated for persons meeting the HUD definition of homeless can be included in the Housing Inventory Chart.
- Documentation for each person being provided accommodations stating that one or more of the HUD identified conditions is true if that person is being served as someone meeting the HUD definition of homeless. Emergency shelters are exempt from having documentation of homelessness prior to entry into shelter. (Staying in a homeless shelter automatically proves a person/family is homeless.) These shelters are required to provide documentation of shelter stays in order to document homelessness for subsequent use of homeless provider services.
- All persons identified as a person meeting the HUD definition of homeless must be entered into the Homeless Management Information System (HMIS) through the single point of entry. Victim Service Providers are exempt from this requirement but are required to enter comparable information into a comparable data base.
- Participation in the annual point in time homeless count administered by The Coalition for the Homeless during the last week of January. Those persons included in the annual count must meet the HUD definition for being homeless.
- Quarterly participation in the Louisville CoC's shelter utilization count on the last Wednesday of the first month of each quarter. Those persons included in the quarterly count must meet the HUD definition for being homeless.

Application Process

The Louisville Metro CoC Process is a year round process that includes quarterly shelter point in time counts, HMIS data quality monitoring and an expectation that CoC members attend 10 of 12 monthly CoC full membership meetings.

Grant Inventory Worksheet

The Grant Inventory Worksheet is a tool used by HUD and the CoC to determine the amount of CoC funding needed to support the projects currently receiving funding through the CoC process. The Coalition for the Homeless, acting as the Collaborative Applicant, works with the applicant agencies to accurately reflect the grant funding provided by HUD during the most recent renewal or as amended. When the CoC, HUD and the agencies/projects agree that the information is correct, the CoC submits the worksheet per HUD's instruction.

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Louisville Metro CoC Policy for Funding Consideration

HUD provides funding for homeless assistance programs authorized under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH) through the CoC competition. Annually, HUD releases a Notice of Funding Availability (NOFA) which details the requirements for the application. One requirement is that there be one Collaborative Applicant for all projects in the CoC. The Collaborative Applicant is responsible for submitting a comprehensive application that includes all projects seeking funding within the CoC geographic area.

To be eligible for funding consideration, applicants must meet the following criteria:

- Applicants must meet all HUD eligibility criteria.
- Applicants must meet the application deadlines set by the Louisville Metro CoC.
- Applicants must be a 501(c) 3, 501 (c) 4, PHA, or local government.
- Applicants must possess legal authority to apply for and receive funds and carry out activities authorized by the CoC Program.
- Applicants must provide the supplementary match funds required by HUD.
- Applicants must comply with HUD's standards for participation in a local Homeless Management Information System (HMIS) and the collection and reporting of client-level information.
- Applicants must participate in the Coordinated Entry Process.
- New applicants must adhere to Housing First principles.
- Applicants must participate fully in the CoC process to coordinate and integrate with other mainstream programs for which homeless populations may be eligible.
- Applicants must assume ultimate responsibility for preparing an accurate and complete application for submission to HUD that meets all federal rules and regulations.
- Applicants must be in compliance with all local, state, and federal civil rights laws and Executive Orders as well as all standards outlined by the U.S. Department of Housing and Urban Development.
- Applicants must agree to comply with federal Section 3 and Energy Star Compliance requirements.
- Applicants must insure that all kids under 18 are allowed to stay in shelter with their other family members/guardians.
- Applicants must insure that all children are enrolled in school.

In order to meet the local needs in serving the homeless population, the following guidelines have been established. These guidelines in no way prohibit any HUD eligible project from applying for HUD funding but rather state the community's priorities, encourage projects that respond to local needs and position the community to bring maximum benefit to serving our homeless population.

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New Applicants

- Housing related projects and projects put forth to respond to a HUD requirement/mandate have been identified by the Louisville Metro CoC to be our highest priority and will be considered as such.
- New nonprofit applicants must submit a copy of their current IRS form 990 and current list of volunteer board of directors.

Renewal Applicants

- Renewal applicants must be in communication with the CoC when changes are made to the renewal project. This includes both financially and programmatically.
- Renewal applicants must have shown a reasonable willingness to participate in the CoC including attending CoC monthly meetings, working with Coordinated Entry, participate in HMIS and working with the CoC to improve outcomes for both the project and the CoC.
- Renewal applicants must be current with the HMIS system and have accurately entered 75% of their client records as determined by the HMIS Coordinator.
- Where applicable, renewal applicants must be in compliance with Louisville Metro Licensing requirements and the community's monitoring standards.

Beginning the process for application

The CoC Collaborative Applicant establishes the timeline for renewal and new project application in collaboration with the CoC Board. This is done in consideration of HUD timelines and the CoC's responsibility to respond to HUD requests.

At a time determined by the CoC Collaborative Applicant, information is publicized regarding funding availability. Responses to this information determine what projects intend to apply for renewal funding and, if guidance is available for the opportunity for new funding, determines agencies' intentions for applying for new projects. Using the latest guidance from HUD, the CoC Collaborative Applicant reviews the responses for application consistency with HUD guidelines. This process also provides the CoC Collaborative Applicant with general budgetary information to begin to determine the amount of funding needed compared to the amount available.

Working with the agencies that have indicated an intention to apply for funding, the CoC Collaborative Applicant prepares the information to be reviewed by the CoC Board for further guidance and critical evaluation. During this process the CoC Collaborative Applicant, along with the CoC Board, work to identify opportunities for the community to:

- Take advantage of specific HUD opportunities for funding,
- Present a clear case for the need for funding in the community, and
- Maximize the community's ability to retain and obtain as much funding as HUD makes available to the community.

While it is the responsibility of the CoC Collaborative Applicant to be educated about HUD rules and procedures, it is also the responsibility of the CoC full membership and applicant agencies to read HUD guidance and apply that guidance to the individual project applications and execution

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1 of the grants if received. It is also the responsibility of the agency/project applying and receiving
2 funds to keep the CoC Collaborative Applicant informed of any changes that take place within
3 the project. It is particularly important to inform the CoC Collaborative Applicant of changes in:

- 4 • Population served,
- 5 • Budget,
- 6 • Project funding and spending, and
- 7 • Basic design of the project.

8
9 In order to facilitate this process throughout the funding cycle, projects are required to submit
10 the following to the Collaborative Applicant:

- 11 • The annual performance report (APR) at the same time it is submitted to HUD. HUD
- 12 requires the APR to be submitted 90 days after the end of the project's operating year.
- 13 • The letter received from local HUD that the APR was received and approved, if applicable.
- 14 • The HMIS report that mirrors the project's APR report.
- 15 • A communication if the project did not spend the amount of funding received from HUD.
- 16 • All information required to complete the quarterly point in time counts – including the
- 17 manual counts, HMIS reports and program capacity reports.
- 18 • All information required to complete the Housing Inventory Chart.
- 19 • All information required to complete the Grant Inventory Worksheet.
- 20 • All other information required to assemble the CoC application for funding.

21
22 It is expected that projects submit information on the required forms in a timely manner or
23 communicate the need for an extension of a deadline – prior to the deadline – to the CoC
24 Collaborative Applicant. The CoC Collaborative Applicant will make every effort to accommodate
25 the need for deadline extensions in the case of emergencies and other reasonable requests. It is
26 paramount, however, that extensions do not adversely affect the timely submission of the
27 community application and the timely submissions of other information required by HUD.

28 Late Submission of Applications and Other Required Information

29 In accordance with the U.S. Department of Housing and Urban Development (HUD) guidelines,
30 the Louisville Metro CoC in no way prohibits any HUD eligible project from applying for HUD
31 funding if done within the guidelines set up by the U.S. Department of Housing and Urban
32 Development. However, in order for the Louisville Metro CoC to submit the best overall
33 application for funding, certain guidelines and deadlines have been established.

34
35
36 It is the policy of the Louisville Metro CoC that when a new or renewal project fails to submit the
37 Application within the CoC's stated deadline the following procedure will be followed:

- 38 • The Louisville Metro CoC Collaborative Applicant must first decide if there is time before
- 39 the official HUD deadline to work with the application without putting all other projects
- 40 in jeopardy of a late submission to HUD. This decision is made with consultation with the
- 41 CoC Board.
- 42 • If it is decided that the project's application should be included in the submission, it will
- 43 be the responsibility of the CoC Board to decide further actions.

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- 1 • If it is decided that there is not sufficient time before the official HUD deadline, the CoC
2 Collaborative Applicant will attempt to identify a reasonable way for the funds to be
3 preserved within the CoC community. If such a way exists, the CoC Collaborative Applicant
4 will work with the CoC Board to pursue such an option. If such a way does not exist, the
5 funds are not applied for in the overall CoC application and the funds are lost to the
6 community.
7

8 Identifying Community Need for New and Expanded Services and Reallocation of Existing Funds 9 for Maximum Use

10 It is the responsibility of the CoC full membership, the CoC Board and the CoC Collaborative
11 Applicant to look for:

- 12 • The need for new or expanded services to the community,
13 • The need to discontinue services when they are no longer needed,
14 • The need to adjust services when realignment is necessary in order to best serve the
15 homeless population of the Louisville Metro CoC,
16 • The opportunity within the community and offered by HUD to improve services and pay
17 for services once unable to be funded, and
18 • Creative ways to maximize the funding dollars available through HUD and other funding
19 sources.
20

21 Meeting this responsibility is done in a variety of formal and informal ways, including:

- 22 • Conducting the yearly Homeless Point in Time Count that includes both a street count and
23 a shelter count,
24 • Conducting the annual Homeless Census Count,
25 • Conducting the quarterly Homeless Point in Time Count that consists of only the shelter
26 count,
27 • Comparing these counts to the Housing Inventory Chart to identify gaps in services,
28 • Listening to CoC members and their experiences of project capacity or lack thereof,
29 • Examining individual project outcomes in relation to CoC and overall HUD goals, and
30 • Examining overall CoC outcomes in relation to CoC and overall HUD goals.
31 • Using evidenced-based measurement tools created by HUD and HUD TA providers.
32 • Holding, at least annually, client input sessions to hear from those needing services.
33

34 Ranking Projects

35 Each year, the U.S. Department of Housing and Urban Development creates priorities for funding
36 of CoC projects. However, they first fund all eligible projects in tier one (above the HUD
37 designated HUD funding amount) before funding those projects in tier two. Therefore, those
38 projects in tier one are more likely to receive funding.
39

40 In order to determine the ranking of projects into these two tiers, the Louisville Metro CoC Board
41 has established a scoring process for ranking based on HUD's Systems Performance
42 Measurements. Presently, the Performance Measures applied to individual projects are:

- 43 • Returns to homelessness

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- 1 • Increased or new income
- 2 • Exits to/maintaining of permanent housing
- 3 • Amount of recaptured funds
- 4 • Length of Stay
- 5 • HMIS data quality
- 6 • Adherence to Housing First principles

8 **Coordinated Entry**

9 In order to help homeless persons, move more quickly and consistently through the Louisville
10 Metro CoC, the CoC has implemented a Coordinated Entry process that includes a single point of
11 entry call/walk-in center, prevention and diversion services and a common assessment. All those
12 seeking shelter and/or homeless provider services are to go through this coordinated entry
13 process to determine the most appropriate and available services for avoiding, diverting or
14 receiving homeless services.

15
16 The Louisville Metro CoC has adopted a general assessment to determine need and the VI-SPDAT
17 to determine a person's vulnerability and thus appropriateness of permanent supported housing
18 and the person's place on a prioritized list for available permanent supported housing
19 units/vouchers.

20
21 The Coordinated Entry Steering Committee is responsible for setting criteria regarding these
22 vulnerabilities and their documentation as well as guiding decisions regarding exceptional cases.
23 The Common Assessment Team will make all referrals to the most appropriate service whether
24 within the CoC or not. This could include referrals to emergency, transitional, rapid or permanent
25 housing as well as referrals to senior housing, hospice or other options in the community.

26 Call-in/Walk-in Center (Single Point of Entry)

27
28 The Call-in/Walk-in Center is responsible for being the first point of contact for accessing
29 prevention, diversion, shelter and permanent housing. Its responsibilities include:

- 30 • Answering calls requesting emergency shelter
- 31 • Making shelter cards for walk-ins
- 32 • Making shelter reservations
- 33 • Referring to Prevention/Diversion
- 34 • Keeping and recording service and outcome statistics as required

35 Prevention and Diversion

36
37 The Prevention and Diversion team's role is to assess those seeking homeless services to identify
38 whether a person's homelessness can be avoided or a person can be diverted from entering the
39 shelter system. Its responsibilities include:

- 40 • Administering the general assessment
- 41 • Linking households to needed services whether the household is determined to be
42 appropriate for prevention, diversion, shelter or permanent housing
- 43 • Updating client information in HMIS

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- 1 • Providing warm handoffs to referral agencies
- 2 • Providing as much assistance as is appropriate to facilitate a successful outcome for
- 3 households
- 4 • Keeping and recording service and outcome statistics as required
- 5 • Making recommendations to Common Assessment regarding client need for housing
- 6 assistance
- 7 • Making referrals for mainstream services
- 8 • At this time the Prevention/Diversion team is focusing on the needs of families both those
- 9 on the family waiting list and those that walk in to Single Point of Entry.
- 10

11 Common Assessment

12 It is also the responsibility of the CoC common assessment staff to:

- 13 • Record numbers of those they assess
- 14 • Locate and assess (VI-SPDAT) those likely to require permanent supported housing
- 15 • Evaluate eligibility for permanent supported housing programs
- 16 • Prioritize who receives transitional housing
- 17 • Prioritize who receives Rapid Re-Housing
- 18 • Make referrals as appropriate to permanent supportive housing
- 19 • Make referrals for mainstream services
- 20 • Insure the needs of special needs clients are addressed and referrals are made for special
- 21 services
- 22 • Provide assessment information to referral agency and post in HMIS
- 23 • In cases where vulnerability is not adequately identified through the VI-SPDAT, the
- 24 Common Assessment Team can use knowledge of extreme vulnerabilities to increase a
- 25 person's ranking for housing. Situations where an individual or household is suffering
- 26 from a dire or life threatening health condition or is likely to suffer extreme physical or
- 27 mental harm are instances where an individual's or household's ranking could be
- 28 increased.
- 29 • All CoC permanent supported housing projects notify Common Assessment of vacancies
- 30 • Common Assessment makes the referrals for filling these vacancies from the prioritized
- 31 list.
- 32 • The Director of Common Assessment has the ability to delegate these responsibilities to
- 33 other parts of the Coordinated Entry as needed to make the process more client friendly
- 34 and more efficient.
- 35

36 **Order of Priority in CoC Program-funded Permanent Supportive Housing**

37 In order to qualify for Permanent Supportive Housing, a client must have a serious and persistent
38 disability that is manifested by their long-term inability to obtain and maintain housing and
39 adequate income. This is determined through a VI-SPDAT assessment conducted by the Common
40 Assessment team. Order of Priority in CoC Program-funded Permanent Supportive Housing Beds
41 Dedicated to Persons Experiencing Chronic Homelessness and Permanent Supportive Housing
42 Prioritized for Occupancy by Persons Experiencing Chronic Homelessness:

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- 1) First Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.
- 2) Second Priority—Chronically Homeless Individuals and Families with the Longest History of Homelessness.
- 3) Third Priority—Chronically Homeless Individuals and Families with the Most Severe Service Needs.
- 4) Fourth Priority—All Other Chronically Homeless Individuals and Families.

Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness:

- 1) First Priority—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs
- 2) Second Priority—Homeless Individuals and Families with a Disability with a Severe Service Needs
- 3) Third Priority—Homeless Individuals and Families with a disability and coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs.
- 4) Fourth Priority—Homeless Individuals and Families with a disability coming from Transitional Housing.

These priorities can only be met when the size and design of the facility opening also fits the need of the next person identified using these priorities. If not, the common assessment team will serve the next appropriate individual/family on the list. These priorities will be used in combination with special set asides made available as part of the federal goals outlined in Opening Doors. Therefore, units set aside for priority populations will only be used for that population, however, those priority populations will still be referred in the order listed above.

Standards for the Administration of CoC Funded Rapid Re-Housing

The U.S. Department of Housing and Urban Development has determined through research that Rapid Re-Housing is an appropriate housing option for all homeless populations with the following exceptions:

- 1) homeless persons who have a severe and persistent disability and a history of long-term chronic homelessness (usually verified through the VI-SPDAT) and who should therefore be referred directly to permanent supportive housing, and
- 2) homeless persons with incomes above 30% of area median income and/or ability to exit quickly on their own from homelessness with or without one-time assistance.

At this time the Louisville Metro CoC is experiencing a severe shortage of shelter options for homeless families. In order to address this the CoC has determined that Rapid Rehousing vacancies will be focused on homeless families. The Prevention/Diversion team has been authorized to complete the VI-SPDAT on families that appear to meet the threshold for Permanent Supported Housing. They have also been authorized to make direct referrals/recommendations to Common Assessment for access to Rapid Rehousing vouchers.

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1 Common Assessment will receive these referrals/recommendations and determine if the
2 household is appropriate for Rapid Rehousing.
3

4 All rapid re-housing clients (including youth) will receive (at a minimum) individualized case
5 management and assistance to obtain and keep housing. If it is determined that a rapid re-
6 housing client is at risk of returning to homelessness at the end of the rapid-re-housing term, a
7 referral should be made to the move-up voucher committee for a permanent housing voucher
8 or to the Common Assessment Team for permanent supportive housing. This referral should be
9 made no later than six months before the end of the rapid re-housing program term.
10

11 In order to make this transition possible, it is important that the housing unit originally identified
12 for assistance through rapid re-housing meet the HQS standards as implemented by Louisville
13 Metro Housing Authority. The referral should include documentation of eligibility for the new
14 form of housing and reason for inability to maintain housing assistance.
15

16 Standards for Determining the Participant Share of Rent and Utilities

17 Participant's income shall be verified prior to approval for initial and additional financial
18 assistance. Documentation of the participant's income and expenses, including how the
19 participant is contributing to housing costs, if at all, shall be maintained in participant's file. This
20 file shall also contain a plan to sustain housing following the assistance, including either a plan to
21 increase income or decrease expenses or both. Participants are not required to contribute rent.
22 Providers funded under the Continuum of Care Program may pay up to 100 percent of the
23 reasonable rent and utility costs for program participants. Providers may, at their discretion,
24 choose to impose rental charges on participants. Any rental charged must be imposed in
25 accordance with the Rapid Re-Housing regulations in 24 CFR 578. Any additional requirements
26 regarding the percentage or amount of rent and utilities costs each program participant shall pay
27 shall be determined by the individual service provider's policies and clearly communicated to
28 program participants.
29

30 Standards for Determining the Length and Level of Assistance

31 Rapid re-housing rental assistance will be provided to program participants who are prioritized
32 through Louisville's coordinated entry.
33

34 Minimum standards for determining how long a particular program participant shall be provided
35 with rental assistance and whether and how the amount of that assistance shall be adjusted over
36 time are:

- 37 • Approval for rental assistance shall be granted in increments of the providers choosing.
38 Providers must re-assess the continuing need for rental assistance no less than annually. In
39 no event will assistance under rapid re-housing exceed 24 months in any 36-month period.
- 40 • Any additional requirements regarding how long a program participant shall be provided with
41 rental assistance and whether and how the amount of that assistance shall be adjusted over
42 time shall be determined by the individual service provider's policies and clearly
43 communicated to program participants.
44

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1 Case management services begin at the time of program entry (not at the time of receiving keys
2 to a unit). Case management is to be provided at least monthly for all CoC rapid re-housing
3 program participants. In addition, housing placement services are provided on the front end of
4 the program to ensure that qualifying program participants secure housing as soon as possible.
5 Supportive Services may be provided to recipients of Rapid Re-Housing Rental Assistance for up
6 to six months after rental assistance ends at the discretion of the provider.
7

8 All providers will have a written termination procedure with the following minimum standards:

- 9 • written notice to the program participant containing a clear statement of the reasons for
10 termination;
- 11 • a review of the decision, in which the program participant is given the opportunity to present
12 written or oral objections to a person who is not the person who initiated the termination or
13 a subordinate of that person; and
- 14 • prompt written notice of the final decision to the program participant.
- 15 • The termination of a client will not bar the program participant from receiving further
16 assistance at a later date.
17

18 **Standards for the Administration of CoC Funded Transitional Housing**

19 Transitional housing is costly and limited and should, therefore, be prioritized for populations
20 that can use the transition to exit permanently to un-subsidized housing options including victims
21 of domestic violence, persons and families in recovery, and young adults.
22

23 All transitional housing clients should receive intensive individualized case management and
24 assistance to obtain and keep housing as well as an intensive and personally targeted set of
25 services designed to help the client obtain and maintain housing.
26

27 All transitional housing clients must come through the Louisville Continuum of Care Single Point
28 of Entry to ensure appropriate HMIS record creation and be referred to the Common Assessment
29 Team for assessment to insure that vulnerable clients are being served. It will be at the discretion
30 of the CoC Board to establish any additional standards that may apply based on either funding
31 source or type of program operated within the geographic area covered by the CoC.
32

33 Standards for Determining the Participant Share of Rent and Utilities

34 Participant's income shall be verified prior to approval for initial and additional financial
35 assistance. Documentation of the participant's income and expenses, including how the
36 participant is contributing to housing costs, if at all, shall be maintained in participant's file. This
37 file shall also contain a plan to sustain housing following the assistance, including either a plan to
38 increase income or decrease expenses or both. Participants are not required to contribute rent
39 except when the program is funded with rental assistance which requires that the client pay 30%
40 of their adjusted income toward rent. Providers funded under the Continuum of Care leasing
41 category may pay up to 100 percent of the reasonable rent and utility costs for program
42 participants. Providers may, at their discretion, choose to impose rental charges on participants.
43 Any rental charged must be imposed in accordance with the Transitional Housing regulations in
44 24 CFR 578. Any additional requirements regarding the percentage or amount of rent and utilities

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1 costs each program participant shall pay shall be determined by the individual service provider's
2 policies and clearly communicated to program participants.
3

4 Standards for Determining the Length and Level of Assistance

5 Minimum standards for determining how long a particular program participant shall be provided
6 with rental assistance and whether and how the amount of that assistance shall be adjusted over
7 time are:

- 8 • Approval for rental assistance shall be granted in increments of the providers choosing.
- 9 • Providers must re-assess the continuing need for rental assistance no less than annually.
- 10 • Assistance under Transitional Housing programs should not exceed 24 months unless an
11 exception for housing transition is documented on a limited basis.
12

13 Requirements regarding how long a program participant shall be provided rental assistance and
14 whether/how the amount of that assistance shall be adjusted over time shall be determined by
15 the individual service provider's policies and clearly communicated to program participants.
16

17 Case management services will be provided at least weekly for all CoC Transitional Housing
18 program participants. In addition, housing placement services are provided on the front end of
19 the program to ensure that qualifying program participants secure housing as soon as possible.
20 Supportive Services may be provided to recipients of Transitional Housing for up to six months
21 after rental assistance ends at the discretion of the provider.
22

23 All providers will have a written termination procedure with the following minimum standards:

- 24 • written notice to the program participant containing a clear statement of the reasons for
25 termination;
- 26 • a review of the decision, in which the program participant is given the opportunity to present
27 written or oral objections to a person who is not the person who initiated the termination or
28 a subordinate of that person;
- 29 • prompt written notice of the final decision to the program participant.
- 30 • The termination of a client will not bar the program participant from receiving further
31 assistance at a later date.
32

33 **Emergency Transfer Plan**

34 Any CoC-funded tenant who is a victim of domestic violence, dating violence, sexual assault, or
35 stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for
36 an emergency transfer, if the tenant reasonably believes that there is a threat of imminent
37 harm from further violence. For program participants who qualify for an emergency transfer
38 but a safe unit is not immediately available for an internal emergency transfer, the individual or
39 family shall have priority over all other applicants for rental assistance, transitional housing,
40 and permanent supportive housing projects funded under this part, provided that: The
41 individual or family meets all eligibility criteria required by Federal law or regulation or HUD
42 NOFA; and the individual or family meets any additional criteria or preferences established in
43 accordance with § 578.93(b)(1), (4), (6), or (7). The individual or family shall not be required to

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1 meet any other eligibility criteria or preferences for the project. The individual or family shall
2 retain their original homeless or chronically homeless status for the purposes of the transfer.
3

4 If a family receiving CoC-funded rental assistance separates in order to affect an emergency
5 transfer, the provider must provide 30-day notice to any family members who no longer qualify
6 for housing along with referrals for housing assistance. If the remaining family members do still
7 qualify for assistance, they should sign a new lease or housing contract and be informed of their
8 housing rights and program requirements.
9

10 **Monitoring Standards**

11 The Coalition for the Homeless introduced the concept of setting standards for local shelter
12 providers in 1990. While other communities had established standards in the areas of health and
13 safety, Louisville created an additional set of standards in the area of programming.
14

15 Standards Process

16 These unmandated standards are coupled with a city zoning and inspection process that focuses
17 on building safety and health standards. These standards can provide the client, the shelter and
18 the larger community with the assurance that the client is being given the best possible
19 opportunity to move back into a stable living environment and achieve self-sufficiency outside
20 the shelter system.
21

22 Monitoring outcomes and standards is done through HMIS reports. These reports are submitted
23 to or run by the Coalition electronically. On-site visits are scheduled as needed.
24

25 Blueprint University Training

26 The Coalition staff identifies training needs of member agencies each year and conducts a
27 minimum of six trainings for front-line shelter staff in these areas. These free trainings are
28 provided to member agencies as part of their membership fee. Other community members are
29 welcome to attend as space permits.
30

31 Yearly training includes: Trauma Informed Care, Domestic Violence, LGBTQ and Housing First.
32 Past Blueprint University topics have included: chemical dependency, child sexual abuse, client
33 interaction and confidentiality, crisis intervention, communicable diseases, cultural diversity,
34 food service, mental health issues, and universal precautions. Some topics may differ yearly
35 depending on the needs of the homeless service community. The trainings are conducted by
36 local experts.
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Updated: 9/9/2018

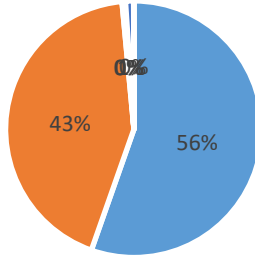
Racial Disparity Assessment Narrative

As part of the 2018 NOFA process, our CoC took steps to assess whether there are racial disparities in the provision or outcome of homeless assistance. To do this, we first took racial demographic data from the US Census Bureau to see the racial breakdown of our CoC's geographic area (Louisville Metro). Next we pulled racial demographic data from our HMIS. Unfortunately, we did find that there are racial disparities in the homeless clients being served in our CoC. While African Americans represent 22% of our CoC's total population, they represent 55% of our homeless population. People who identify as White make up 72% of our total population, while only 42% of our homeless population identifies as White.

Although our CoC found a racial disparity in minorities being over-represented in our total clients served, we did find that minorities tend to have more positive outcomes from homeless assistance. According to our HMIS data for exit destinations from 7/1/2017-7/1/2018, 25% of African Americans had a positive outcome, while 14.4% of Whites had a positive outcome. We also found that exits from emergency shelter to places not meant for human habitation (PNMHH) did not have as much of a disparity with African Americans exiting to PNMHH at a rate of 40% and Whites at a rate of 39%.

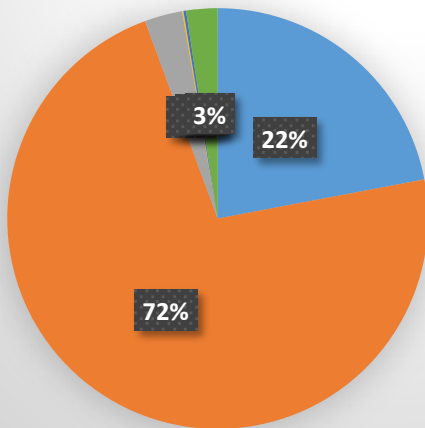
During this assessment process our CoC identified steps we are already taking to address disparities, and steps we will take in the future. Through Coordinated Entry we have expanded outreach in geographic areas with higher concentrations of underrepresented groups. Additionally, we have ensured that all of our communication and materials are inclusive of underrepresented groups. We have also reached out to a local non-profit training group to provide staff training and education on racial equity as it pertains to health and homelessness. Going forward, we have identified additional strategies we will take to address racial disparity which include: Dedicating CoC staff and/or resources charged with analyzing and addressing racial disparities; educating organizations, boards, and stakeholders on the topic of racial disparities in homelessness and how we can create greater diversity; and collecting data and doing additional research to understand the scope and needs of different races experiencing homelessness.

HMIS Race (Louisville Metro)



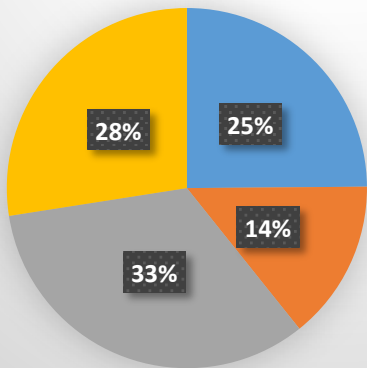
- African American (55%)
- White (42.82%)
- Asian (.32%)
- Native Hawaiian/Pacific Islander (.12%)
- Alaska Native/American Indian (1%)
- Multi-Racial (.04%)

U.S. Census Data (Louisville Metro)



- African American (22%)
- White (72.3%)
- Asian (2.9%)
- Native Hawaiian/Pacific Islander (.1)
- Alaska Native/American Indian (.2%)
- Multi-Racial (2.4%)

Positive Exit Destinations by Race (7/1/2017-7/1/2018)



- African Americans
- White
- Asian
- Alaska Native/American Indian

US Census Bureau- Quick Facts

<https://www.census.gov/quickfacts/fact/table/jeffersoncountykentucky/RHI225217>

(QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income and Poverty Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits.)

72.3% White

22.0% Black

.2% Amer Ind/ Alaska

2.9% Asian

.1% Nat Haw & OPI

2.4% 2 or more race

5.3% Hispanic

Kentucky State Data Center [KY state data ctr.xlsx](#)

67.66% White

21.61% Black

2.92% Asian

2.45% Other

5.34% Hispanic

HMIS Race: (all HMIS projects) (7/1/2017-7/1/2018)

Client Primary Race	Count	%
American Indian or Alaska Native (HUD)	57	1.00%
Asian (HUD)	18	0.32%
Black or African American (HUD)	3146	55.39%
Client doesn't know (HUD)	4	0.07%
Client refused (HUD)	7	0.12%
Data not collected (HUD)	1	0.02%
Native Hawaiian or Other Pacific Islander (HUD)	7	0.12%
Other	1	0.02%
Other Multi-Racial	2	0.04%
White (HUD)	2432	42.82%
	5	0.09%
Sum:	5680	
	Percentage:	100.00%

St. John's

Using last fiscal year as the date frame, 51% of PSH clients are African American, 44% white, and 5% other, who identify as Latino or multiple races.

Next I took value-neutral exits out of the mix, such death and as a transfer to a nursing home due to health status.

Of the 12 remaining exits, 8 were positive exits (Move Ups or move to a better housing option) and 4 were negative exits (2 went to jail, 1 lease violation/back to the streets, 1 disappeared).

100% of the negative exits were white (4 of 4)

63% of positive exits were African American (5 of 8)

37% of positive exits were white (3 of 8)

Consumer survey race data:

2014:

- **57%** identified as African American/Black
- **38%** identified as Caucasian/White
- **1%** identified as Hispanic/Latino

- **4%** identified as Multiracial/Other
- **69%** identified as male/men
- **21%** identified as female/women
- **2%** identified their gender as “other”

2015 -Only 2 surveys given, 1 reported AA, other did not report

2016

54% self-identified as African-American/Black
33% self-identified as Caucasian/White
2% self-identified as African
2% self-identified as Hispanic
2% self-identified as Native American
2% self-identified as Biracial
5% did not disclose race

2017

50% self-identified as African-American/Black
33% self-identified as Caucasian/White
13% self-identified as Other
2% self-identified as Hispanic
2% self-identified as Multiple Races

Youth survey:

<u>Race</u>	
Data Not Collected	23%
Black/African-American	55%
White	9%
Native American	4%
Mixed Race	9%

Positive Exit Destination from 10/1/2016-7/1/2018

American Indian/Alaskan Native	22/69	31.8%
Asian	5/23	21.7
Black or AA	1134/3421	33.1%
Native Hawaiian or OPI	1/3	33.3%
Multi-racial	0/1	0%
White	589/2819	20.8%

Positive Exit Destination Report from 7/1/2017- 7/1/2018

American Indian/Alaskan Native	19/69	27.5%
Asian	3/9	33.3%
Black or AA	704/2826	24.9%
Native Hawaiian or OPI	1/1	100%
Multi-racial	0/2	0%
White	390/2701	14.4%

Positive Exit Destination from Emergency Shelter 7/1/2017-7/1/2018

American Indian/Alaskan Native	0/6	0%
Asian	0/2	0%
Black or AA	4/296	1.3%
Native Hawaiian or OPI	None	
Multi-racial	0/2	0%
White	1/375	.2%

Exit to PNMHH from Emergency Shelter

American Indian/Alaskan Native	3/6	50%
Asian	2/2	100%
Black or AA	119/296	40.2%

Native Hawaiian or OPI	None	
Multi-racial	1/2	50%
White	147/375	39.2%

Positive Exit Destination from Street Outreach 7/1/2017-7/1/2018

Black or AA	6/11	54.5%
White	19/35	54.2%

Positive Exit Destination from Day Shelter 7/1/2017-7/1/2018

American Indian/Alaskan Native	0/14	0%
Asian	0/4	0%
Black or AA	13/392	3.3%
Native Hawaiian or OPI	0/1	0%
Multi-racial	0/1	0%
White	22/598	3.6%

Exit to PNMHH from Day Shelter

American Indian/Alaskan Native	14/14	100%
Asian	4/4	100%
Black or AA	379/392	96.6%
Native Hawaiian or OPI	1/1	100%
Multi-racial	1/1	100%
White	576/598	96.3%

Client Gender	Count	%
Client doesn't know	1	0.02%
Client refused	2	0.04%
Female	2281	#####
Gender Non-Conforming (i.e. not exclusiv	1	0.02%
Male	3376	#####
Trans Female (MTF or Male to Female)	13	0.23%
Trans Male (FTM or Female to Male)	5	0.09%
	1	0.02%
Sum:	5680	
	Percentage:	#####

DV	Count	%
Client doesn't know (HUD)	17	0.29%
Client refused (HUD)	5	0.08%
Data not collected (HUD)	4	0.07%
No (HUD)	3993	67.21%
Not Applicable	4	0.07%
Yes (HUD)	1458	24.54%
Missing	460	7.74%
	Percentage:	#####

Client Primary Race	Count	%
American Indian or Alaska Native (HUD)	57	1.00%
Asian (HUD)	18	0.32%
Black or African American (HUD)	3146	55.39%
Client doesn't know (HUD)	4	0.07%
Client refused (HUD)	7	0.12%
Data not collected (HUD)	1	0.02%
Native Hawaiian or Other Pacific Islander (HUD)	7	0.12%
Other	1	0.02%
Other Multi-Racial	2	0.04%
White (HUD)	2432	42.82%
	5	0.09%
Sum:	5680	
	Percentage:	100.00%

Client Ethnicity	Count
Client doesn't know (HUD)	3
Client refused (HUD)	8
Data not collected (HUD)	3
Hispanic/Latino (HUD)	185
Non-Hispanic/Non-Latino (HUD)	5468
Not of Hispanic Orgin	3
Missing	10

Disabled?	Count	Percentage
Client doesn't know (HUD)	21	0.35%
Client refused (HUD)	3	0.05%
Data not collected (HUD)	5	0.08%
No (HUD)	2487	41.51%
Yes (HUD)	3353	55.96%
Missing	123	2.05%
	Percentage:	100.00%

Household Type	Count
Caregiver	10
Child Under 18	8
Couple	41
Couple (Parent & Friend) and Child	17
Couple w. Dependent Children	214
Couple With No Children	34
Female Single Parent	1075
Grandparent(s) and Child	23
Male Single Parent	68
Other	9
Single	21
Single w. Dependent Children	182
Two Parent Family	47
Singles	4079

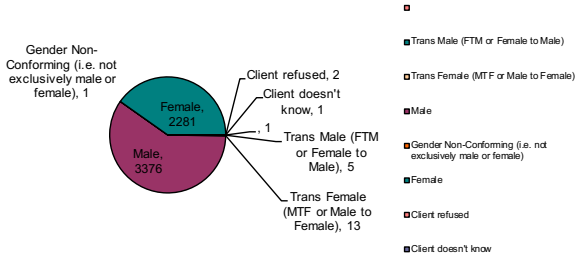
In Foster Care System?	Count
Client doesn't know	
Missing	1432
No	3952
Refused	
Yes	569
Sum:	5953

CC: 5680 **NOTE: Missing Destinations can be due to clients active in a project**

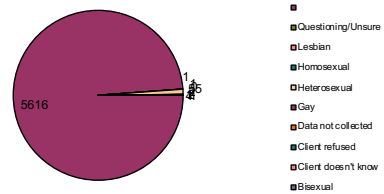
Unique Client Count will count every instance of a client's stay. For example, if Client #12335 answers "Client Doesn't Know" for his 5 stays at Wayside, then the count would be 5. Client Count, however, will unduplicate the clients. Also, percentage is based off of Client Count.

Merge Destination	Client Count	Percentage
Client doesn't know (HUD)	558	7.05%
Client refused (HUD)	3	0.04%
Data not collected (HUD)	4	0.05%
Deceased (HUD)	40	0.51%
Emergency shelter, including hotel or motel paid for with emergency shelter voucher (HUD)	2190	27.66%
Foster care home or foster care group home (HUD)	8	0.10%
Hospital or other residential non-psychiatric medical facility (HUD)	8	0.10%
Hotel or motel paid for without emergency shelter voucher (HUD)	3	0.04%
Jail, prison or juvenile detention facility (HUD)	25	0.32%
Long-term care facility or nursing home (HUD)	11	0.14%
Missing	2278	28.77%
Moved from one HOPWA funded project to HOPWA PH (HUD)	0	
Moved from one HOPWA funded project to HOPWA TH (HUD)	0	
Next Level of program (Recovery Kentucky Only)	0	
No exit interview completed (HUD)	29	0.37%
Other (HUD)	81	1.02%
Owned by client, no ongoing housing subsidy (HUD)	1	0.01%
Owned by client, with ongoing housing subsidy (HUD)	1	0.01%
Permanent housing (other than RRH) for formerly homeless persons (HUD)	361	4.56%
Place not meant for habitation (HUD)	1369	17.29%
Psychiatric hospital or other psychiatric facility (HUD)	2	0.03%
Rental by client, no ongoing housing subsidy (HUD)	185	2.34%
Rental by client, with GPD TIP subsidy (HUD)	0	
Rental by client, with other ongoing housing subsidy (HUD)	258	3.26%
Rental by client, with RRH or equivalent subsidy (HUD)	177	2.24%
Rental by client, with VASH subsidy (HUD)	28	0.35%
Residential project or halfway house with no homeless criteria (HUD)	7	0.09%
Safe Haven (HUD)	6	0.08%
Staying or living with family, permanent tenure (HUD)	64	0.81%
Staying or living with family, temporary tenure (e.g., room, apartment or house)(HUD)	50	0.63%
Staying or living with friends, permanent tenure (HUD)	29	0.37%
Staying or living with friends, temporary tenure (e.g., room apartment or house)(HUD)	73	0.92%
Substance abuse treatment facility or detox center (HUD)	8	0.10%
Transitional housing for homeless persons (including homeless youth) (HUD)	61	0.77%
Sum:	7918	
	Percentage:	100.00%

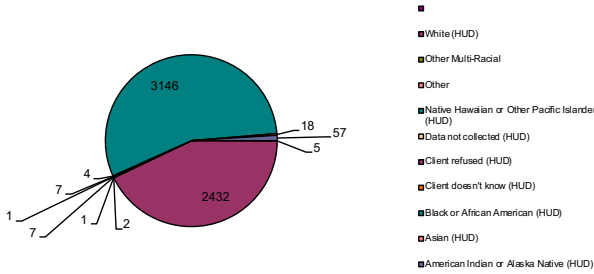
Gender



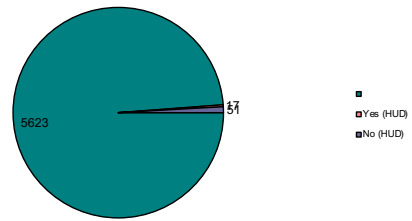
Sexual Orientation (RHY ONLY)



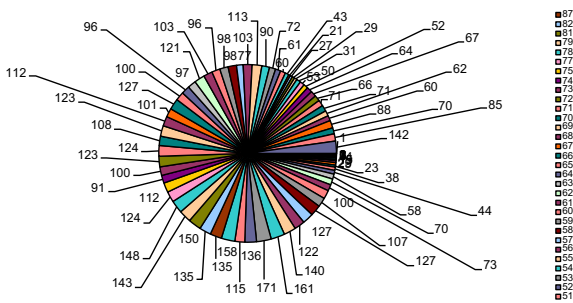
Race



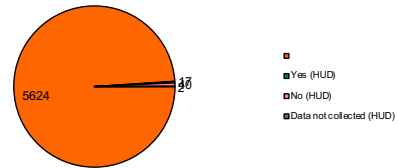
Employed (RHY ONLY)



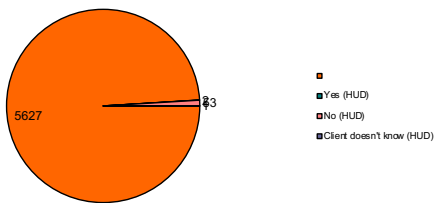
Age at Entry



Ward? (RHY ONLY)

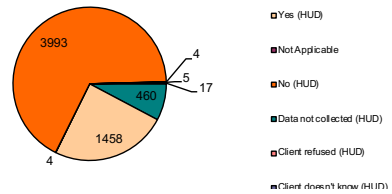


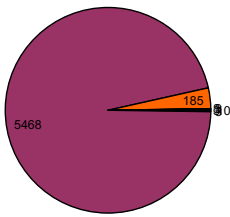
Pregnant? (RHY ONLY)



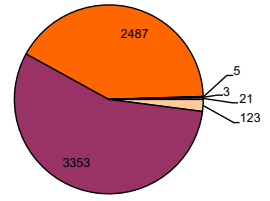
Ethnicity

DV





- Not of Hispanic Origin
- Non-Hispanic, Non-Latino (HUD)
- Hispanic/Latino (HUD)
- Data not collected (HUD)
- Client refused (HUD)
- Client doesn't know (HUD)



- Yes (HUD)
- No (HUD)
- Data not collected (HUD)
- Client refused (HUD)
- Client doesn't know (HUD)

	American Indian or Alaska Native (HUD)	Asian (HUD)	Black or African American (HUD)	Client doesn't know (HUD)	Client refused (HUD)	Data not collected (HUD)	Native Hawaiian or Other Pacific Islander (HUD)	Other	Other Multi-Racial	White (HUD)	
Client doesn't know (HUD)	4	2	273		1			1	1	273	3
Client refused (HUD)			2							1	
Data not collected (HUD)			4								
Deceased (HUD)	2		16							22	
Emergency shelter, including hotel or motel paid for with emergency shelter voucher (HUD)	19	6	1035	2	3			1		1123	1
Foster care home or foster care group home (HUD)			4							4	
Hospital or other residential non-psychiatric medical facility (HUD)			2							6	
Hotel or motel paid for without emergency shelter voucher (HUD)			1							2	
Jail, prison or juvenile detention facility (HUD)	1	1	15							8	
Long-term care facility or nursing home (HUD)			3							8	
Moved from one HOPWA funded project to HOPWA PH (HUD)											
Moved from one HOPWA funded project to HOPWA TH (HUD)											
Next Level of program (Recovery Kentucky Only)											
No exit interview completed (HUD)	1		20							8	
Other (HUD)		1	42							38	
Owned by client, no ongoing housing subsidy (HUD)			1								
Owned by client, with ongoing housing subsidy (HUD)										1	
Permanent housing (other than RRH) for formerly homeless person (HUD)	6	2	195							158	
Place not meant for habitation (HUD)	20	6	609	2	3	1	1		1	725	1
Psychiatric hospital or other psychiatric facility (HUD)			1							1	
Rental by client, no ongoing housing subsidy (HUD)	1		119							65	
Rental by client, with GPD TIP subsidy (HUD)											
Rental by client, with other ongoing housing subsidy (HUD)	4		192				1			61	
Rental by client, with RRH or equivalent subsidy (HUD)	5		135							37	
Rental by client, with VASH subsidy (HUD)		1	15							12	
Residential project or halfway house with no homeless criteria (HUD)			3							4	
Safe Haven (HUD)	1		5								
Staying or living with family, permanent tenure (HUD)	2		26							36	
Staying or living with family, temporary tenure (e.g., room and board) (HUD)	1		30							19	
Staying or living with friends, permanent tenure (HUD)			13							16	
Staying or living with friends, temporary tenure (e.g., room and board) (HUD)	1	2	27							43	
Substance abuse treatment facility or detox center (HUD)			3							5	
Transitional housing for homeless persons (including homeless shelters) (HUD)	1	#NAME?	35							25	
Missing	21	4	1356		2		5	1	1	886	2
Total (not incl missing)	69	9	2826	4	9	1	2	2	2	2701	5

	American Indian or Alaska Native (HUD)	Asian (HUD)	Black or African American (HUD)	Client refused (HUD)	Other	Other Multi-Racial	White (HUD)	total
Client doesn't know (HUD)	3		154	1	1	1	216	376
Client refused (HUD)								0
Data not collected (HUD)								0
Deceased (HUD)			1					1
Emergency shelter, including hotel or motel paid for with emergency shelter voucher (HUD)			5				9	14
Foster care home or foster care group home (HUD)								0
Hospital or other residential non-psychiatric medical facility (HUD)			1				1	2
Hotel or motel paid for without emergency shelter voucher (HUD)								0
Jail, prison or juvenile detention facility (HUD)								0
Long-term care facility or nursing home (HUD)								0
Moved from one HOPWA funded project to HOPWA PH (HUD)								0
Moved from one HOPWA funded project to HOPWA TH (HUD)								0
Next Level of program (Recovery Kentucky Only)								0
No exit interview completed (HUD)								0
Other (HUD)								0
Owned by client, no ongoing housing subsidy (HUD)								0
Owned by client, with ongoing housing subsidy (HUD)								0
Permanent housing (other than RRH) for formerly homeless person (HUD)			1					1
Place not meant for habitation (HUD)	3	2	119			1	147	272
Psychiatric hospital or other psychiatric facility (HUD)								0
Rental by client, no ongoing housing subsidy (HUD)								0
Rental by client, with GPD TIP subsidy (HUD)								0
Rental by client, with other ongoing housing subsidy (HUD)			1				1	2
Rental by client, with RRH or equivalent subsidy (HUD)								0
Rental by client, with VASH subsidy (HUD)								0
Residential project or halfway house with no homeless criteria (HUD)								0
Safe Haven (HUD)								0
Staying or living with family, permanent tenure (HUD)								0
Staying or living with family, temporary tenure (e.g., room and board) (HUD)							1	1
Staying or living with friends, permanent tenure (HUD)			2					2
Staying or living with friends, temporary tenure (e.g., room and board) (HUD)			3					3
Substance abuse treatment facility or detox center (HUD)								0
Transitional housing for homeless persons (including homeless shelters) (HUD)								0
Missing			9				10	19
Total	6	2	296	1	1	2	375	27

	Black or African American (HUD)	White (HUD)	Count:
Client doesn't know (HUD)			0
Client refused (HUD)			0
Data not collected (HUD)			0
Deceased (HUD)			0
Emergency shelter, including hotel or motel paid for with emergency shelter voucher (HUD)		1	1
Foster care home or foster care group home (HUD)			0
Hospital or other residential non-psychiatric medical facility (HUD)			0
Hotel or motel paid for without emergency shelter voucher (HUD)	1		1
Jail, prison or juvenile detention facility (HUD)		1	1
Long-term care facility or nursing home (HUD)		1	1
Moved from one HOPWA funded project to HOPWA PH (HUD)			0
Moved from one HOPWA funded project to HOPWA TH (HUD)			0
Next Level of program (Recovery Kentucky Only)			0
No exit interview completed (HUD)	1	2	3
Other (HUD)	2	6	8
Owned by client, no ongoing housing subsidy (HUD)			0
Owned by client, with ongoing housing subsidy (HUD)			0
Permanent housing (other than RRH) for formerly homeless person (HUD)		1	1
Place not meant for habitation (HUD)		3	3
Psychiatric hospital or other psychiatric facility (HUD)			0
Rental by client, no ongoing housing subsidy (HUD)	1	2	3
Rental by client, with GPD TIP subsidy (HUD)			0
Rental by client, with other ongoing housing subsidy (HUD)	5	13	18
Rental by client, with RRH or equivalent subsidy (HUD)			0
Rental by client, with VASH subsidy (HUD)			0
Residential project or halfway house with no homeless criteria (HUD)			0
Safe Haven (HUD)			0
Staying or living with family, permanent tenure (HUD)		3	3
Staying or living with family, temporary tenure (e.g., room, apartment) (HUD)	1	1	2
Staying or living with friends, permanent tenure (HUD)			0
Staying or living with friends, temporary tenure (e.g., room, apartment) (HUD)		1	1
Substance abuse treatment facility or detox center (HUD)			0
Transitional housing for homeless persons (including homeless shelters) (HUD)	1+D6B37D7:D35D4:D35D5:D35D6:D35		
Missing	6	8	14
Total (not incl missing)	11	35	46

	American Indian or Alaska Native (HUD)	Asian (HUD)	Black or African American (HUD)	Client doesn't know (HUD)	Client refused (HUD)	Data not collected (HUD)	Native Hawaiian or Other Pacific Islander (HUD)	Other Multi-Racial	White (HUD)	Total
Client doesn't know (HUD)										0
Client refused (HUD)										0
Data not collected (HUD)										0
Deceased (HUD)										0
Emergency shelter, including hotel or motel paid for with emergency shelter voucher (HUD)										0
Foster care home or foster care group home (HUD)										0
Hospital or other residential non-psychiatric medical facility										0
Hotel or motel paid for without emergency shelter voucher (HUD)										0
Jail, prison or juvenile detention facility (HUD)										0
Long-term care facility or nursing home (HUD)										0
Moved from one HOPWA funded project to HOPWA PH (HUD)										0
Moved from one HOPWA funded project to HOPWA TH (HUD)										0
Next Level of program (Recovery Kentucky Only)										0
No exit interview completed (HUD)										0
Other (HUD)										0
Owned by client, no ongoing housing subsidy (HUD)										0
Owned by client, with ongoing housing subsidy (HUD)										0
Permanent housing (other than RRH) for formerly homeless person (HUD)			13						19	32
Place not meant for habitation (HUD)	14	4	379	2	3	1	1	1	576	981
Psychiatric hospital or other psychiatric facility (HUD)										0
Rental by client, no ongoing housing subsidy (HUD)										0
Rental by client, with GPD TIP subsidy (HUD)										0
Rental by client, with other ongoing housing subsidy (HUD)								2		2
Rental by client, with RRH or equivalent subsidy (HUD)										0
Rental by client, with VASH subsidy (HUD)								1		1
Residential project or halfway house with no homeless criteria (HUD)										0
Safe Haven (HUD)										0
Staying or living with family, permanent tenure (HUD)										0
Staying or living with family, temporary tenure (e.g., room and board) (HUD)										0
Staying or living with friends, permanent tenure (HUD)										0
Staying or living with friends, temporary tenure (e.g., room and board) (HUD)										0
Substance abuse treatment facility or detox center (HUD)										0
Transitional housing for homeless persons (including homeless shelters) (HUD)										0
Total	14	4	392	2	3	1	1	1	598	13

Start Date: 7/1/2017

End Date: 7/1/2018

Providers:

Choices-Permanent-CoC-PSH-LOU(2221);
Family Children-CH2-CoC-PSH-LOU(2246);
House of Ruth-CH2-CoC-PSH-LOU(985);
St. John-CH2-PSH-LOU(2245);
SVDP Louisville-CH2-PSH-LOU(887);
Wellspring-CH2-CoC-PSH-LOU(993);
Phoenix-SAMSA 2-RX Housing/Section 8-PSH-LOU(1209);
Phoenix-SAMSA 3 RX Housing/Section 8-PSH-LOU(2311);
Phoenix-Rx:Housing-CoC-PSH-LOU(2552);
Phoenix-Lash-PSH-LOU(2137);
Wellspring-Lash-PSH-LOU(2138);
SPE-Call Center-CoC-LOU(2152);
SPE-Common Assessment-CoC-SSO-LOU(2233);
Phoenix-PSHCH-CoC-PSH-LOU(997);
St. John-PSHCH-CoC-PSH-LOU(1012);
Family Children-PSHYA-SHP-CoC-PSH-LOU(2244);
St. John-PSHYA-SHP-CoC-PSH-LOU(2243);
St. John-SHCH Samaritan-CoC-PSH-LOU(1598);
Home of Innocents-THYA-TH-LOU(1009);
Home of Innocent-RRH-LOU(2389);
Louisville Metro CS-COC-RRH-LOU(2462);
VOA-COC-RRH-LOU(2255);
House of Ruth-Homes with Heart-CoC-PSH-LOU(849);
Louisville Metro Housing CH3-CoC-PSH-LOU(2459);
Louisville Metro Housing NC1-CoC-PSH-LOU(2230);
Louisville Metro Housing NC2-CoC-PSH-LOU(2231);
Louisville Metro Housing-Tenant TBRA-SPC-CoC-PSH-LOU(1696);
SVDP Louisville-Simon Hall-SPC-CoC-PSH-LOU(692);
SVDP Louisville-Homes Single Apartments-CoC-PSH-LOU(1960);
House of Ruth-Kersey Condo-SPC-CoC-PSH-LOU(921);
Wellspring-Baxter Ave-CoC-PSH-LOU(696);
Wellspring-Journey House-CoC-PSH-LOU(2225);
Wellspring-Murray McKinney-CoC-PSH-LOU(697);
Family Children-CHI-CoC-PSH-LOU(990);
House of Ruth-CHI-CoC-PSH-LOU(986);
SVDP Louisville-CHI-CoC-PSH-LOU(963);
VOA Louisville-CHI-CoC-PSH-LOU(991);
SVDP Louisville-Homes with Hope-CoC-PSH-LOU(1321);
SVDP Louisville-Homes Family-CoC-PSH-LOU(1959);
SVDP Louisville-Homes SRO-CoC-PSH-LOU(1958);
Wayside Mission-Men Permanent--CoC-PSH-LOU(714);