



## Grand Rapids Area Coalition to End Homelessness<sup>1</sup> Governance Charter

The Grand Rapids Area Coalition to End Homelessness is a community collaborative that is actively working on systems change in the area of homelessness. The goal of the Coalition is to prevent and end systemic homelessness in Kent County, guided by the values and philosophy set forth in the original 10-year community developed plan, the *Vision to End Homelessness*.

The Grand Rapids Area Coalition to End Homelessness, also known as the Kent County Continuum of Care (CoC), is an independent, non-incorporated membership entity comprised of numerous organizations and individuals. It was formed in response to federal requirements in the McKinney-Vento Homeless Assistance Act of 1987 reauthorization in 1994 and amended in the Homeless Emergency Assistance and Rapid Transition (HEARTH) Act of 2009 for administration of US Department of Housing and Urban Development (HUD) funding to address homelessness as described in 24 CFR Part 578.5. The CoC Governance Charter and subsequent amendments are approved, consistent with 24 CFR Part 578.5, by the CoC membership. Governance decisions on behalf of the CoC are made by a Steering Council elected from the membership, in accordance with the CoC Governance charter. Annually the Continuum of Care applies to the HUD Continuum of Care (CoC) Program for funding to address homelessness.

The CoC is committed to collaboration where ever possible to accomplish its stated goals to end homelessness. The Essential Needs Task Force (ENTF), a broader community effort to coordinate the response to basic needs and strengthen communications across systems in Kent County is one such effort that the CoC is committed to participation in. (To learn more about ENTF, see [entfkent.org](http://entfkent.org)). The ENTF functions with subcommittees that include Housing, Energy Efficiency, Economic & Workforce Development, Transportation, Food & Nutrition.

### I. Continuum of Care (CoC)

#### A. Role

The Continuum of Care champions the *Vision to End Homelessness*, convening to determine local priorities, strengthen communication, encourage best practices, and promote collaboration to achieve goals.

As a community collaborative, the Continuum of Care:

- Promotes community commitment to the goal of ending homelessness,
- Gathers and analyzes information to determine local needs of individuals experiencing homelessness,
- Provides a comprehensive, well-coordinated, and clear planning process,
- Promotes access to and effective use of existing programs,
- Implements strategic responses and measures results,
- Applies for funding from the U.S. Department of Housing and Urban Development (HUD) and other funding sources based on local priorities.

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<sup>1</sup> Resource documents: Coalition Structure, March 2010; *Establishing and Operating a Continuum of Care*, 2012, US Department of Housing and Urban Development

## B. Responsibilities

The major responsibilities that must be carried out by the CoC to comply with HUD expectations are as follows:

1. Convene regular meetings of the full membership, with published agendas, at least semi-annually
2. Issue a public invitation for new members within Kent County at least annually
3. Adopt and follow a written process to select a board to act on behalf of the CoC (identified as the Steering Council for Continuum of Care) and review that process at least once every 5 years
4. Appoint additional committees, subcommittees, or work groups comprised of provider representatives and community advocates; and action boards comprised of consumers, as needed.
5. Designate the Homeless Management Information System (HMIS) lead for the CoC
6. In consultation with the collaborative applicant for HUD funds and the HMIS lead, develop, follow and update annually:
  - a. A governance charter
  - b. A code of conduct and recusal process for the board, its chairperson and any person acting on behalf of the board
7. Establish and operate a centralized or coordinated entry system
8. Develop a plan for a coordinated housing and service system that meets the needs of individuals, unaccompanied youth, and families experiencing homelessness
9. Plan and conduct an annual Point-in-Time count of sheltered and unsheltered persons that meets HUD guidelines
10. Establish performance targets appropriate for population and program type in consultation with recipients and sub-recipients
11. Monitor recipient and sub-recipient performance and address concerns of poor performance
12. Work with Emergency Solutions Grants recipients and Consolidated Plan jurisdictions within the geographic boundaries of the CoC to allocate, report and evaluate use of funds, and inform the plan
13. In consultation with recipients of Emergency Solutions Grants program funds, establish and consistently follow written standards for providing CoC assistance with those funds

The CoC is responsible for carrying out all activities listed above. In Kent County, the CoC delegates these responsibilities to its Steering Council which may, in turn, delegate some of these responsibilities to other organizations. Because the Kent County CoC is not incorporated, Memorandums of Understanding (MOU)s rather than contracts are used whenever any of these responsibilities are delegated to other entities. These MOUs are reviewed on an annual basis by the CoC Steering Council against performance expectations outlined in the MOU. Under the current Governance Charter three particular tasks are delegated to other entities through MOUs. These include:

- o Fiscal Agent (Entity that provides paid staff support for the CoC)
- o HMIS Lead Agency (entity holding responsibility for Homeless Management Information System (HMIS) management and maintenance)
- o Collaborative Applicant (entity formally completing the HUD CoC Competition application)

## C. Members & Term of Service

The Continuum of Care is comprised of agencies and organizations that provide direct services to households experiencing a housing crisis, other related service organizations that engage directly or indirectly with households that experience a housing crisis, and homeless or formerly homeless individuals, and is open to:

1. nonprofit homelessness assistance providers,
2. victim services providers,
3. faith-based organizations,
4. government entities,
5. businesses,

6. advocates,
7. public housing authorities,
8. school districts,
9. social services providers,
10. mental health agencies,
11. hospitals,
12. universities,
13. affordable housing developers,
14. law enforcement,
15. organizations serving veterans,
16. homeless or formerly homeless individuals.

A public invitation must be issued for new members from Kent County a minimum of once each year. While membership is voluntary, organizations and homeless or formerly homeless individuals are required to formally sign-up as members and affirm their commitment to the mission of the Coalition to End Homelessness in order to have voting and other privileges with the group. Member organizations or entities must designate one person to serve as the voting representative. Annually, members of the Continuum of Care must renew their membership and confirm the designation of their voting representative.

A roster of voting representatives is maintained and updated at least annually. A voting representative from an organization or agency may assign their proxy to another individual from their organization; however, at no time will any organization be provided with multiple votes. The voting representative must provide a 24 hour notice to CoC staff via email indicating which pre-registered alternate voter (of which there can be no more than two) will be voting for their organization. Additionally, any voting representative can only vote once and cannot represent more than one organization or person.

Continuum of Care members may continue to participate indefinitely. Members are expected to attend CoC meetings a minimum of twice a year and are strongly encouraged to participate in committees and work groups.

#### **D. Meetings**

The Continuum of Care must meet a minimum of twice a year although more meetings may be held as needed.

1. Steering Council Chairperson presides at Continuum of Care meetings.
2. Meeting agenda are developed by the Steering Council and published in advance of the Continuum of Care meeting.
3. Continuum of Care members have the right to suggest additional agenda items for a Continuum of Care meeting, but additional agenda items must be approved by a majority vote of those in attendance at that Continuum of Care meeting.
4. Meetings may include opportunities to share information about local partners, best practices from the field, progress toward achieving the goals of the Coalition, and Coalition activities.
5. Attendance records must be maintained, and the records must include the names of all individuals, with organizations noted as appropriate.

## **II. Steering Council**

### **A. Role**

The Coalition Continuum of Care represents many community stakeholders in carrying out the mission of leading the community in finding solutions for preventing and ending homelessness. To facilitate effective execution of Coalition goals, a Steering Council performs the functions of a CoC board, with certain specific responsibilities assigned by the Continuum of Care through this Governance Charter.

## B. Responsibilities

The Steering Council is responsible for ensuring that the seven major HUD defined responsibilities in Section I.B. are carried out. In addition, the Steering Council is authorized by the Continuum of Care to:

1. Serve as the primary decision-making entity for the Continuum of Care according to the approved governance structure,
2. Set the agenda for the Continuum of Care meetings,
3. Establish policies, principles and priorities and select the Collaborative Applicant for the HUD NOFA process,
4. Determine project priorities and monitor the outcomes of those projects,
5. Oversee the competitive process for annual CoC application submissions to HUD and other funding sources and provide final approval for those application submissions,
6. Establish policies for data release and monitor HMIS Standard Operating Procedures either through direct administration of or designation of an HMIS implementing agency,
7. Direct system planning activities that engage CoC members,
8. Direct analysis of system-wide data to identify community needs and gaps and report to the CoC

## C. Participants and Terms of Service

The Steering Council is comprised of up to twenty-one (21) seats representing the broad array of interests within the Coalition and must:

1. Include at least **two homeless or formerly homeless individuals**
2. At a minimum, represent the relevant organizations and projects serving homeless subpopulations, such as persons with substance use disorders; persons with HIV/AIDS; veterans; the chronically homeless; facilities with children; unaccompanied youth; the seriously mentally ill; formerly incarcerated; and victims of domestic violence, dating violence, sexual assault, and stalking. One member may represent the interest of more than one homeless subpopulation, and the Steering Council must represent all subpopulations within the Coalition to the extent that someone is available and willing to represent the subpopulation.

The seats referenced above are rotating seats with alternating, three-year terms, elected by the Continuum of Care annually. Steering Council members whose terms are expiring are allowed to campaign for re-election for continuing terms.

Six seats are considered permanent, non-rotating seats assigned to the following entities:

- a. Units of local government that are HUD Grantees:
  1. City of Grand Rapids
  2. City of Wyoming
  3. Kent County
- b. HARA (Housing Assessment and Resource Agency)/Central Intake
- c. Action Boards
  1. Youth Action Board
  2. Veteran Action Board

These entities are responsible for designating their representative to the Coalition Steering Council.

Steering Council members must serve on committees and work groups, including those organized by the CoC, those organized by external groups, or other existing community forums with relevant objectives. Service on committees and work groups is critical to ensuring effective liaison and coordination of activities.

Steering Council members serve for three-year terms, staggered so that approximately one-third of all terms end in any given year. The Continuum of Care shall determine the specific fiscal year period for terms on the Steering Council.

The selection process for Steering Council members is described under the Nominating Committee. This process is subject to review and alteration on an annual basis by Continuum of Care but no less frequently than every five years.

#### **D. Meetings and Attendance**

The Steering Council meets a minimum of six times annually.

The Steering Council responsibilities are such that at each meeting the group should be capable of voting on an issue. This requires members to be present for the vote and involved to make an informed decision. Therefore, Steering Council members should maintain a minimum attendance rate of 75% of all Steering Council meetings. If any member falls below this amount, they will be asked to re-evaluate and ensure they are able to maintain their commitment. If at least 50% of meetings have been missed in the twelve-month period of October –September, the seat will be considered open in the next Steering Council election.

#### **E. Officers**

1. Chairperson, vice chairperson, secretary, and treasurer;
2. Elected by the Steering Council annually during a specific month as determined by the Steering Council but no longer than 60 days following the annual election by the Continuum of Care of new members to that Council;
3. Officer terms are one year and can be renewed;
4. Steering Council chairperson, or vice-chairperson in the absence of the chairperson, presides at meetings of the Steering Council, the Executive Committee, and CoC Continuum of Care;
5. In absence of a sitting Chairperson, ENTF staff will Chair the Steering Council meeting with the sole purpose of executing officer elections;
6. All Steering Council members are expected to observe the Code of Conduct and the Conflict of Interest Policy.

#### **F. Decision Making**

The presence of a majority of Steering Council members then holding office shall constitute a quorum at all meetings. If a quorum is not present, no voting will occur. A simple majority of those in attendance and eligible to vote is necessary for any resolution to be passed.

Within elected seats of the Steering Council, no alternate representative will be given a proxy vote. For appointed seats, those six held by the HUD Participating Jurisdictions, the HARA, and action boards an alternate representative is able to vote. Advance notice of which member will be attending and voting should be provided in writing to CoC staff.

In the matter of approving funding recommendations made by the Funding Review Committee, the Steering Council will give final approval. Once approval is secured, CoC staff shall inform applicants of the outcome of their application in writing. Included in this notice should be the Funding Decision Appeal policy of the CoC, informing applicants of their right to appeal and the process in which to do so.

There may be instances when a decision is needed by the Steering Council between regularly scheduled meetings. When this happens, electronic voting may be completed. A simple majority of current Steering Council members is necessary for any resolution to be passed. Members who do not subscribe to an email service must have contact attempted to allow them to vote verbally.

### **III. Committees**

In the interest of transparency and community involvement, all committees except those requiring election, shall be open to all CoC members.

#### **A. Executive Committee**

##### **Role and Responsibilities**

In accordance with resolutions passed from time to time by the Steering Council delegating specific tasks to the committee, the Executive Committee may meet as needed to:

1. Consider and recommend the annual budget,
2. Consider staffing needs and make recommendations on fulfilling necessary functions,
3. Review financial reports and present them to the Steering Council,
4. Consider and recommend policy,
5. Prepare annual work plan and calendar including required CoC functions,
6. Plan Steering Council meeting agenda,
7. Plan Continuum of Care meeting agenda,
8. Appoint members to serve in the case of a vacancy to the Steering Council or nominating committee,
9. Make recommendations on committees, task forces, or work groups and recommend members,
10. Lead the process to create a strategic plan that advances the goal of ending homelessness.

##### **Limitations**

Unless otherwise specifically delegated by Steering Council resolution for Executive Committee action, all Executive Committee determinations are presented to the Steering Council for final review and/or decision-making.

##### **Participants and Terms of Service**

The executive committee of the Steering Council is made up of the four officers plus a minimum of one other Steering Council member.

##### **Meetings**

The executive committee meets as needed between meetings of the Steering Council.

In the event of a resignation from the Steering Council, the Executive Committee shall appoint a member to serve on the Council until the next election. Priority for the appointment shall be given to the organization or population area the resigning member had represented, with consideration given to any population areas unrepresented in the current Steering Council membership.

#### **B. Nominating Committee**

##### **Role and Responsibilities**

The Nominating Committee is responsible for proposing election or re-election of the **fifteen rotating seats** of Steering Council members whose terms are coming to an end or to fill positions that have been vacated. Nominating Committee members serve staggered two-year terms.

Members of the Nominating Committee must:

1. Review the current composition of the Steering Council to determine satisfactory systemic representation in accordance with the approved policy of the Continuum of Care;
2. Evaluate attendance of members who are completing a term and, if eligible for reappointment, determine their willingness to continue;
3. Seek recommendations from the Continuum of Care membership for qualified candidates;
4. Deliberate and compile a list of eligible candidates to present to the Continuum of Care for election;
5. Provide for an open process allowing nominations from the floor at the Continuum of Care meeting convened for the annual election.

### **Officers**

The Nominating Committee also is responsible for preparing a slate of officers for presentation to the Steering Council for annual election to take place no later than 60 days after the beginning of the annual term for Steering Council members. To carry out this responsibility, the Nominating Committee will review officers' participation and term end dates, recruit candidates, and prepare a slate to present to the Steering Council for election.

### **Participants and Terms of Service**

The Nominating Committee is comprised of five individuals, including three CoC members and two members of the Steering Council who are not currently serving as officers. Nominating Committee members must have a working knowledge of CoC responsibilities and structure, the Coalition, and the *Vision to End Homelessness*.

The Nominating Committee is formed to serve for two years.

1. The Steering Council selects a Steering Council member to chair the Nominating Committee and selects one additional Steering Council member to serve on the committee
2. The Continuum of Care members elect Nominating Committee members by the following process:
  - a. A minimum of three weeks in advance of a scheduled Continuum of Care meeting, candidates to serve on the Nominating Committee are sought through distribution of a message to all Continuum of Care' voting representatives of record;
  - b. A written ballot is distributed to voting representatives at the Continuum of Care meeting; each qualified voting representative can vote for three candidates;
  - c. Votes are tallied and the three candidates receiving the highest number of votes serve on the Nominating Committee;
  - d. In the event of a resignation from the committee, the Executive Committee shall appoint a member to serve until the next election.

### **Meetings**

Six months prior to the end of the fiscal year: Nominating Committee formed based on process above

Four/five months prior to the end of the fiscal year: Nominating Committee meets

One month prior to the end of the fiscal year: Continuum of Care elects new or renewing Steering members

First month of the fiscal year: New Steering Council members join and within sixty days the Steering Council elects officers from a slate prepared by the Nominating Committee

## **C. Funding Review Committee**

### **Role and Responsibilities**

The Funding Review Committee is responsible for reviewing applications and making prioritized project funding recommendations to the Steering Council for action. Funding sources include the Homeless Emergency Assistance

and Rapid Transition to Housing (HEARTH Act) grant funds under the Continuum of Care Program administered by HUD.

The Funding Review Committee develops the scoring criteria for rating and ranking applications based on local needs and priorities and HUD priorities for program services as outlined in the Notice of Funding Availability (NOFA). The committee is responsible for understanding the NOFA, considering local priorities, and evaluating applicant agencies' program performance based on evidence and data.

### **Participants and Terms of Service**

The Funding Review Committee is comprised of community members who represent systems that fund or interface with the homeless system, are knowledgeable about homelessness and housing, but are not applicants. This includes individuals from the various homeless sub-populations; homeless service providers (e.g., prevention, emergency housing, transitional housing, permanent and permanent supportive housing); municipalities and governmental units that fund the Coalition; and community representatives (e.g., business, foundations, United Way). Members of the Funding Review Committee need not be Coalition members.

The Steering Council is responsible for appointing the Funding Review Committee members. In selecting committee members, the Steering Council will attempt to avoid even the appearance of impropriety. All committee members will review the Conflict of Interest policy and complete the disclosure form prior to beginning their service on the committee. Potential conflicts of interest could include: participation in the planning of a project or providing technical assistance in the preparation of a project application in either a paid or volunteer capacity or active involvement as a board or staff member of any agency that has a proposal for funding pending. Perceived advocacy for a project can also disqualify an individual from serving on the committee.

### **Meetings**

The Funding Review Committee meets as needed to carry out its duties. Typically, this includes an orientation session, a meeting to consider priorities, one or more meetings to evaluate applications, and one or more meetings to score and rank applications. New members will also be required to meet as necessary to complete the committee training curriculum as approved by the Steering Council. Meetings are scheduled to provide sufficient time to complete the work, forward recommendations for Steering Council action, and submit the completed application to meet HUD deadlines.

### **Appeals**

An Appeals Panel shall be assembled for each funding round consistent with the Appeals Policy for funding recommendations that is adopted and updated by the Steering Council.

## **D. HMIS Data Quality Committee**

### **Role and Responsibilities**

The Homeless Management Information System (HMIS) is a tool for the community and HUD to develop better information on the nature of homelessness, the number of people experiencing homelessness, the existing patterns in housing programs and services, and the effectiveness of programs and services in addressing homelessness. HMIS must be used by the CoC and all recipients of HUD program funds.

The HMIS Data Quality Committee performs several important functions: insuring that the HMIS is administered in compliance with requirements prescribed by HUD, reviewing, revising, and recommending adoption of an HMIS privacy plan, security plan, and data quality plan, and ensuring the consistent participation of recipients and sub recipients in the HMIS.



The HMIS Data Quality Committee is responsible for on-going system wide analysis to identify strengths and gaps in the data system and for preparing and/or updating data quality standards for consideration by the Steering Council.

A subcommittee, the HMIS Users Group, is responsible for ensuring that all agency and program staff with responsibility for data entry are appropriately trained on system use and for assisting with formulation and periodic review of policy and procedures, such as the privacy plan.

#### **Participants and Terms of Service**

Members of the HMIS Data Quality Committee are selected based on their knowledge of data systems, standards for data quality, and relevant policy and procedures, for example, policy related to data privacy. Members must commit to understanding basic HUD requirements in relation to data collection and reporting.

Committee members are drawn from Coalition CoC member agencies and include representation from HUD-funded agencies and non-HUD-funded agencies. Other individuals may be appointed to the committee based on specific expertise.

The HMIS Users Group, a subcommittee of the Data Quality Committee, is open to all member agency staff members with direct, hands-on, responsibility for entering data and using the data system.

### **E. Coordinated Entry Committee**

#### **Role and Responsibilities**

The primary role of the Coordinated Entry Committee is to provide oversight and review to the Coordinated Entry system for households experiencing homelessness to be served by both temporary and permanent housing, according to eligibility and service standards of the community.

#### **Participants and Terms of Service**

The Coordinated Assessment Entry is made up of representatives of those Coalition CoC member agencies that participate in the Coordinated Entry system. Coordinated Entry Committee should likewise include representation from community systems level and other CoC members not directly participating in the Coordinated Entry system.

### **F. Data Analysis Committee**

#### **Role and Responsibilities**

The Data Analysis committee is responsible for regular review of multi-level data to evaluate system level progress toward ending homelessness. The work of this committee shall inform the work of other committees to ensure activities are contributing to improved system level outcomes. This committee is specifically charged with preparation and review of annual HUD System Performance Measures reports, Point-in-Time and Housing Inventory reports. The committee is responsible for reporting to the Steering Council on a regular basis regarding the effectiveness of the comprehensive system to address homelessness. This should include specific attention to system level performance measures established by the CoC (see Sec I. A, Continuum of Care: Implements strategic responses and measures results).

### **Participation and Terms of Service**

Members of the Data Analysis Committee are drawn from the Coalition CoC membership and wider community and should have a basic understanding of data and its use in evaluation.

### **G. Ad-Hoc Workgroups**

Workgroups are time-limited, task-oriented groups that are recruited and assigned responsibility for addressing a specific issue or challenge, including achieving the strategic plan objectives. Such groups will be formed as need is determined by Steering Council, or upon recommendation of one of the standing committees. A representative of each workgroup shall be appointed to report to one of the standing committees to ensure communication and coordination of work. Workgroups also may form organically as a result of individuals coming together around a shared concern or interest. When such work groups form organically, there should be brief written statement of purpose, focus, including expected time span of work and expected outcome. Such statement is to be submitted to Steering Council for reference.

### **H. Action Boards**

Action Boards are established to ensure that the effort to end homelessness in Kent County incorporates the expertise of those experiencing homelessness or who are formerly homeless. The Action Boards shall have voting representation on the CoC's Steering Council and as necessary shall independently advise the CoC.

Designees, elected by a majority of the Action Board, shall serve as a single voting member of the Steering Council. Action Board members are also encouraged to serve on subcommittees and workgroups.

#### **Role and Responsibilities**

1. Provide feedback to the CoC on prevention, crisis response, and housing solutions to end homelessness
2. Recommend policies and practices to prevent and respond to homelessness
3. Assist in project development and funding decisions
  - o Action Boards shall inform planning efforts
  - o To review and recommend funding priorities and applications in addressing homelessness for specific applications as required by funding application.
4. Advise on and support education and advocacy efforts for systems reform on the local, state and federal levels to support the plans to end homelessness.

#### **Participation and Terms of Service**

Action Boards shall consist of no fewer than three (3) members and no more than eight (8) members of the designated population group. Members must have experienced homelessness previously or currently be experiencing homelessness. The Action Board shall meet a minimum of quarterly. The Action Boards will seek to ensure cross-representation among over-represented sub-populations. Individuals may fulfill cross-representation of categories.

#### **Current Action Boards**

1. Youth Action Board
2. Veteran Action Board

## **IV. Conflict of Interest**

No Steering Council member may vote on matters concerning the award of a grant or other financial benefits if it might affect the organization that member represents. In addition, members will avoid conflicts of interest between the Coalition and any personal, professional, and business interests.

In any vote that might create a conflict of interest for the voting member, it is their responsibility to state that they recuse themselves from the vote. In written records of the vote, these members should be noted as having abstained.

At the beginning of each fiscal year, Steering Council members are expected to sign the Conflict of Interest policy document and to abide by the provisions regarding disclosure at all meetings. The signed policy documents are kept on file with meeting minutes and other records.

## **V. Code of Conduct**

The Coalition prohibits the solicitation and acceptance of gifts or gratuities (anything of monetary value) by officers, employees and agents for their personal benefit.

The Coalition promotes impartiality in performing official duties and prohibits any activity representing a conflict of interest. Individual members should not act on a matter if a reasonable person who knew the circumstances of the situation could legitimately question that individual's fairness.

The Coalition prohibits the misuse of position for personal gain or for the benefit of family or friends.

Officers and employees shall put forth honest effort in the performance of their duties. They shall not knowingly make unauthorized commitments or promises of any kind purporting to bind the Coalition without previous Steering Council approval.

Officers and employees shall disclose waste, fraud, abuse, and corruption to appropriate authorities.

## **VI. Schedule of Review**

This Governance Charter for the Grand Rapids Area Coalition to End Homelessness CoC is subject to annual review. All responsibilities required of a Continuum of Care must be thoroughly documented in the CoC's governance charter.

Specifically, the Continuum of Care "in consultation with the collaborative applicant and the Homeless Management Information System (HMIS) lead, must develop, follow, and update annually (1) a governance charter that includes all procedures and policies needed to comply with 24 CFR Part 578.5(b) and with HMIS requirements as prescribed by HUD and (2) a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the board." (2012, *Establishing and Operating a Continuum of Care*, US Department of Housing and Urban Development, page 4)

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