



Steering Council Meeting Agenda  
June 17, 2022 ▫ 9:00 – 10:30 am ▫ Zoom

**8:00am** - Work Session: Draft CoC Infrastructure & Staffing Plan

**8:45am** - Public Comment on Work Session (Limit 3 minutes ea.)

1. **9:00am** - Call to Order/Introductions
2. Approval of the Agenda\*
3. Approval of May 20, 2022 Minutes\*
4. Public Comment on Agenda Items (Limit 3 minutes ea.)
5. Approval of Consent Agenda\*
  - a. Steering Calendar
  - b. Committee and Initiative Updates
  - c. ESG Financial Assistance Report
  - d. MSHDA ESG FY22-23 Exhibit 1
  - e. Budget Report: Statement of Activity
  - f. Strategic Plan: Coalition Scorecard - Quarterly Rocks
  - g. Data Reports: CERA Status Update
6. Petitions and Communications
7. FY2022-2023 MSHDA ESG Funding
8. Kent County American Rescue Plan Act Funding
9. Coalition Fair Housing & Anti-Discrimination Policy\* - *draft document included with the agenda packet (pgs 19-26)*
10. Any other matters by Steering Council Member(s)
11. Public Comment on Any Matter (Limit 3 minutes ea.)
12. Adjournment

Next meeting: Friday, July 15<sup>th</sup>, 8:30 – 10:30am

\* denotes potential action item



## STEERING COUNCIL MEETING MINUTES - **DRAFT**

May 20, 2022  
8:30-10:30

Facilitator:	Lauren VanKeulen		
Meeting Attendees:	<u>Steering members present:</u> Lauren VanKeulen, Tom Cottrell, Holly Wilson, Rebecca Rynbrandt, Victoria Sluga, Susan Cervantes, Tammy Britton, Karen Tjapkes, Ryan VerWys, Jose Salinas, Cheryl Schuch, Elizabeth Stoddard, Wanda Couch, Fran Dalton, Victoria Arnold, Alonda Trammell <u>Steering members absent with notification:</u> Casey Gordon, Adrienne Goodstal, Mark Contreras <u>Steering members absent without notification:</u> Nelson Soto <u>Community Members:</u> Wende Randall (Essential Needs Task Force) <u>Staff:</u> Courtney Myers-Keaton, Brianne Robach		
Time Convened:	8:31am	Time Adjourned:	10:45 am

<b>Approval of Agenda</b>			
Motion by:	Tom Cottrell	Support from:	Cheryl Schuch
Discussion			
Amendments	None		
Conclusion	All in favor, motion passes.		
<b>Approval of Minutes</b>		<b>April 22, 2022</b>	
Motion by:	Holly Wilson	Support from:	Tom Cottrell
Discussion			
Amendments	None		
Conclusion	All in favor, motion passes.		
<b>Public Comment on Any Agenda Item</b>			
Discussion			
None			
<b>Approval of Consent Agenda</b>			
Motion by:	Cheryl Schuch	Support from:	Tammy Britton
Discussion	None		
Amendments			
Conclusion	All in favor, motion passes.		
<b>Petitions and Communications</b>			
Discussion			
None			
<b>FY23 Coalition Budget</b>			
Discussion	<p>Courtney presented the budget that was presented to Heart of West Michigan United Way's (HWMUW) board. She indicated that it is subject to change if infrastructure changes (to be discussed later in the agenda) are implemented. There are a few areas of note:</p> <ul style="list-style-type: none"> <li>- Funding is available to support a Program Manager and a part-time Administrative Assistant.</li> <li>- If the HMIS grant is transferred to HWMUW, the line-item amount will change slightly. Some funds will go to HWMUW for administration and HMIS licenses. The remainder will continue to support staffing (currently contracted).</li> </ul>		



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- Built-in projections include increases HUD Planning amounts each year and cost of living for staff.
- Kent County CDBG is this budget but has not yet been awarded.
- Match from HWMUW but will be reducing over the next 3 years. Conversations around match sources are occurring.

Courtney noted that Steering Council would typically approve this budget but recommends waiting for approval as changes would be made if there are infrastructure changes. Agreement to wait.

Action Items	Person Responsible	Deadline

**FY22-23 MSHDA ESG Funding**

Discussion

The Michigan State Housing Development Authority (MSHDA) recently released the timeline for their 2022-2023 funding. They anticipate allocation amounts will be released in June. Communities are asked to submit Exhibit 1 by June 17<sup>th</sup> instead of after the application submission which has been practice in past years. Courtney proposed creating an ESG Exhibit 1 workgroup to review the draft document and provide comments. The draft would also be posted publicly for comment. Members interested in serving on the review team should contact Courtney.

Courtney overviewed application questions and thinks the Coalition is well-positioned to answer questions. There are a few new required attachments including a racial demographics report and Anti-Discrimination and Fair Housing Policies which were in progress when Exhibit 1 was released. Written service standards for Rapid Re-Housing (RRH), Emergency Shelter (ES), Prevention, and Street Outreach (SO) are also required. RRH standards are already in place as is a SO policy that functions as service standards. The policy was not adopted by Steering, and Courtney does not think adoption is needed. Standards for ES and prevention are not currently in place and will need to be developed. Courtney plans to ask draft policies are allowable for the submission given the short time between the release of Exhibit 1 and its due date.

Courtney indicated that funding priorities for the allocation will need to be determined so the Coalition can begin a Request for Qualifications (RFQ) process to allocate the funds. One area that has been mentioned is increasing funds for SO. An SO lead agency could also be considered to support all populations, ensure fidelity to SO policies, and share expectations with new providers. Courtney anticipates discussion around funding priorities would occur the June 17<sup>th</sup> meeting.

Action Items	Person Responsible	Deadline

**Funding Appeal Policy**

Discussion

Brianne shared that work has been done to update the Coalition's Funding Appeals Policy and Process over the last few months as the previous process was interim. A draft of an updated Funding Appeal Policy and Process was included in the agenda packet; Steering Council is asked to approve the policy.



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MOTION to approve the Funding Appeal Policy and Process as presented by Tammy. SECOND from Elizabeth. Conversation around whether to include information on the mechanics of requesting an appeal. Tom feels this would ensure applicants are aware they can access information on how a Funding Review Committee decision was made. Elizabeth noted access to information would be helpful as appeals must include reasoning and any evidence. In practice, applicants can contact Coalition staff to receive feedback on funding decisions. Rebecca proposed clarity in the RFQ around the appeals process. Text will be added in the Appeals Process and Timeline section of the policy indicating that appeals shall be submitted “as outlined in the RFQ”. Victoria Sluga appreciates the increased transparency and ability of agencies to incorporate feedback in future applications.

**MOTION to approve the Funding Appeal Policy as amended with a general appeals process statement by Tammy. SECOND from Elizabeth. All in favor, motion passes.**

(Wanda Couch left the meeting)

Action Items	Person Responsible	Deadline

**Funding Process Review Update**

Discussion

Courtney shared that there have been conversations around the funding process for the CoC Program Competition. Staff have been researching processes and metrics used by other communities and have developed draft scoring categories for renewal applications. Funding Review Committee (FRC) has reviewed the updated scoring criteria and an initial draft will be shared with providers for feedback. It can also be provided to Steering with a copy of last year’s scorecard for reference. Another process change that is being considered is inviting providers to present renewal projects to FRC.

Lauren asked if process changes would impact reallocation. Courtney noted that FRC has discussed creating a threshold below which discussion about reallocation is warranted. The Coalition allocated a significant amount of funding in 2015 which was ahead of many communities so reallocation would be considered based on project performance and community needs. She also noted that this coming year could serve as a bridge to prepare providers to shift to a threshold for reallocation.

Tom stated that COVID-19 and relief funds will impact on project outputs. Courtney indicated that this year’s process will likely assume that all providers were impacted similarly. She also indicated that scoring criteria will be reviewed annually to ensure alignment with HUD and community priorities.

Action Items	Person Responsible	Deadline

**CoC Application Review Update**

Discussion

A small group met yesterday to discuss the FY21 CoC Application and review the debrief provided by HUD. Discussion included next steps to prepare for this year’s application. Attendees suggested the application process is structured in a way that pulls in expertise from community organizations. Courtney thinks this can be met through a CoC Application workgroup responsible for preparing for the next application and moving work forward. The group would be open to Coalition members. Contact staff if you are interested.



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Courtney overviewed CoC Program Competition Debriefing from HUD. The document can be provided to Steering. Sizable points were lost due to a decrease in RRH beds in the 2021 Housing Inventory Count. The decrease is likely due to impacts of the pandemic and stagnation in the market as RRH funding did not decrease in 2021 and 2022 numbers are similar to 2020 bed numbers. Cheryl feels clarity on the reasons behind the decrease will be important to plan for future years. Courtney plans to reach out to RRH providers to discuss this further. A few points were also lost in the section around bed coverage. Since then, an additional provider has begun to enter data into HMIS which may help improve this coming year's score. However, local VASH vouchers are administered across multiple counties which makes it difficult to enter data into HMIS thus impacting the bed coverage score. This has been a concern locally and by CoCs across the country in previous rounds.

(Jose left the meeting)

Cheryl asked if work with FUSE and the GRACE network can be leveraged to help the Coalition gain bonus points in the upcoming round. Courtney anticipates last year's bonus points will become scored questions in this year's round.

Action Items	Person Responsible	Deadline

### YHDP Update

#### Discussion

Courtney shared that the Youth Homelessness Demonstration Project (YHDP) application is due June 28<sup>th</sup>. The YHDP is an opportunity for communities to demonstrate how well they are poised to create a coordinated plan to address youth homelessness. She is hopeful the community will be funded this round. Youth providers have convened to help with application including conducting a youth needs assessment, a provider survey, and weekly meetings to discuss action steps for a strong application.

Cheryl asked if other CoCs who received funding could support and advise on the application. Courtney welcomed connections. The committee has met with Traverse City in the past though their experience was much different as they are a rural community. Detroit was also recently selected for funding and has shared that hiring a grant writer was beneficial to their application. If interested in reviewing the application, contact staff.

Lauren noted that the application period has historically included a process to select a lead agency. This year, the Coalition will not undergo this process to submit the application.

Action Items	Person Responsible	Deadline

### Draft CoC Infrastructure & Staffing Plan

#### Discussion

Courtney shared that there have ongoing conversations around the need to increase Coalition staffing. The core responsibilities of the Coalition as a Continuum of Care (CoC) consist of design and operation of a Homeless Management Information System (HMIS), governance and structure, system ops and planning, preparing the CoC Application, and implementation of Coordinated Entry (CE)



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processes. She presented a draft infrastructure and staffing plan developed with community stakeholders that increases staffing and addresses these responsibilities:

- Currently, HMIS administration and support are provided by contract. Feedback from providers suggests this capacity is not fully meeting needs. As such, the proposed infrastructure includes a full-time system administrator and help desk specialist.
- The Salvation Army (TSA) is currently the CE lead agency and staff have done a great job in this role. With process changes being made, it may no longer make sense to have all CE staff in a centralized location. The proposed infrastructure addresses these changes and the need for coordination, facilitation, and leadership of CE processes by creating a full-time CE Manager position at the Coalition. Need for a CE Coordinator under the CE Manager has been discussed but not determined. Under the proposed structure, TSA would no longer be the CE lead agency.
- The structure also includes current positions - CoC Director, Program Manager, and a full-time Administrative Assistant (increased from part-time in the current budget). A Data Analyst to incorporate data and storytelling is also included. Funds have been lightly committed for this position but not secured.
- Overall, the proposed infrastructure includes up to 7 FTE staff.
- The proposed funding for this infrastructure has two components. One is shifting the HUD HMIS grant from TSA to HWMUW as HWMUW already fulfills the responsibilities of grant via MOU. The second and larger shift is shifting CE grants from TSA to HWMUW to provide the proposed staffing. An RFP to support components of CE processes would be released for use of the remaining funds.
- The benefits of the proposed structure include a high-functioning and sustainable CoC structure, alignment with the strategic plan, addressing needs for complex data analytics, and ability to meet CE requirements.
- There are several assumptions built into the proposed infrastructure: Coalition staff do not provide direct services, TSA no longer houses an outreach specialist position, TSA will continue to hold prevention funds and can help with coordination of these funds, Coalition staff will manage the functions of a HARA as defined by MSHDA (unless contracted to a different agency).

Lauren shared that she has been working with Courtney and Executive Committee to draft this infrastructure which also has full support from HWMUW and TSA leadership. The proposed infrastructure is about creating a cohesive system to meet needs and not about taking anything from TSA. She thinks it will address piecemealing which can lead to reduced efficacy and resolve concerns with understaffing. Plus, many CoCs across the country follow a similar structure.

Victoria Sluga agreed that a more robust Coalition staffing structure is needed and suggested listing street outreach as avenue for CE access. She asked where collective communication and grant management would fall in the proposed structure. Courtney indicated that these would be under the director (with opportunity to contract) and program manager, respectively.



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Fran asked about TSA’s current and future roles and a needs assessment. Courtney indicated that the proposal brings some positions currently housed at TSA to the Coalition. The shift towards Community Housing Connect (CHC) 2.0 is also anticipated to fill in gaps. She has discussed future roles with TSA though this has not been fully flushed out yet. Victoria Arnold indicated that if TSA were to decrease staff, this could limit individuals available via phone and in person. Lauren indicated that this initial draft was informed by evaluating community needs. Courtney indicated she is continuing to ensure nothing is lost in the proposed structure. Fran suggested developing an intersectional graph showing current and future states.

Cheryl thinks the proposed infrastructure will bring significantly more capacity and more efficient use of funding as it brings coordination to the community level instead of the provider level. She noted that CHC 2.0 will need infrastructure and facilitation for implementation which this proposal provides. She advocated that funding for communications remains on the Coalition’s radar even though it cannot be funded through this infrastructure. She also agreed that increased staff capacity around data and HMIS is needed. Lauren agreed that increased facilitation capacity will be beneficial in the move towards CHC 2.0 with Solutions Specialists at different agencies instead of a centralized system. (Tom leave)

Ryan encouraged awareness to unintentional outcomes as decentralizing may require more pass off between agencies which can increase subjectivity and variation. Cheryl indicated that this is currently a risk without the structure to centralize coordination. Courtney thinks this proposed structure will bring back some centralization. (Cheryl leave)

Lauren asked about the best next steps in bringing this to the full Coalition. She thinks moving this forward at the June Steering Council meeting would be important. Rebecca asked about engagement with the full Coalition membership. The proposal could be brought to the June membership meeting for final approval, if recommended by Steering Council. Rebecca suggested starting the June Steering Council meeting early to hold a public information session. This would leverage existing meetings and help Steering to hear public comments. The public can also hear Steering conversation prior to a vote at the general membership meeting. (Holly and Fran leave)

Lauren encouraged members to think through the proposal and ask questions ahead of the June meeting.

Action Items	Person Responsible	Deadline
<b>Other Matters from Steering Council members</b>		
Discussion		
None.		
<b>Public Comment on Any Item</b>		
Discussion		



GRAND RAPIDS AREA  
COALITION TO END  
HOMELESSNESS

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None.	
<b>Adjourn</b>	

DRAFT





GRAND RAPIDS/WYOMING/KENT COUNTY  
STEERING COUNCIL ANNUAL CALENDAR  
Updated November 2021

**January**

Steering Council Orientation  
Executive Officer Elections  
Point in Time Count  
Draft Budget Presentation  
Steering Council Annual Conflict of Interest  
Forms Completed  
Strategic Plan: Review of Q4 Rocks and  
Introduction of Q1 Rocks

**February**

City of Grand Rapids Emergency Solutions Grant  
Application  
Reallocation Discussion  
Budget Approval

**March**

Data Quality Committee Report  
CoC and ESG Mid-Term Monitoring

**April**

LIHTC Developer Presentations to Steering  
(October Round)  
Point in Time Count Submitted to HUD  
Budget Review  
Strategic Plan: Review of Q1 Rocks and  
Introduction of Q2 Rocks

**May**

Nominating Committee forms

**June**

Steering Council Funding Process Review  
Governance Charter Recommended Changes to  
CoC membership  
Open Call for New CoC Members  
PIT Data Released

**July**

NAEH Annual Conference  
Strategic Plan: Review of Q2 Rocks and  
Introduction of Q3 Rocks

**August**

HUD CoC Program Funding Vote (Anticipated)  
System Performance Measures Reported to CoC  
CoC, Fiduciary, HARA MOU for ESG Execution

**September**

MSHDA Emergency Solutions Grant Application  
HUD CoC Program Application Due (Anticipated)  
PIT Planning Begins

**October**

LIHTC Developer Presentations to Steering  
(April Round)  
Governance Charter Review, including Fiduciary  
MOU  
Strategic Plan: Review of Q3 Rocks and  
Introduction of Q4 Rocks

**November**

Staff Evaluations Initiated by Fiduciary

**December**

Steering Council elections (at CoC meeting)  
Staff Evaluations Concluded by Fiduciary  
Budget Preparation Begins  
Strategic Plan: Review & Update Annual  
Priorities



## Grand Rapids/Wyoming/Kent County CoC – MI 506 Steering Council Committee & Initiative Reporting – June 2022

### **Coordinated Entry Committee --**

The Coordinated Entry Team was only able to meet once since the last report. Additionally, the Redesign group met twice, the Category 4 DV partners have met. Highlights of this integrated work include:

- The CE Team voted to eliminate the COVID risk assessment screening from the prioritization process, as there are now alternate means of managing risk other than housing isolation.
- Although still required by MSHDA as a part of the client record, the team agrees that the VI-SPDAT should be replaced by an interim tool that would be patterned from the CHC but be uniquely designed for single adults. Vetting this tool over time, will better position us to have the CHC 2.0 tool be more comprehensive in the populations served.
- The BNL for singles is poised to be launched, and a formal case conference protocol established.
- The HUD CE assessment was reviewed by the CE team and revisions noted for the final product to establish alignment clear with HUD expectations.
- The CE Redesign team reviewed the logistics of the phases of implementation of CHC 2.0 tool. We note that a clear sense of the community resource pool will be critical to effective use of the tool and the CE protocols that will use it.
- DV providers discussed the possibility of having specialty DV-focused Solutions Specialists, but given confidentiality restrictions and immediate safety needs of survivors, the current methodology of using the CHC tool will not work. Alternate models that dovetail the current system response (as is currently used for families with the CHC tool) and a DV emergency response were discussed.

### **Family Functional Zero --**

- Community level dashboards that include inflow and outflow of families entering the system, as well as exit destination and length of time families are experiencing homelessness can be found [here](#).
- The FFO workgroup continues to develop an inventory of the affordable housing resources available in the community. This inventory includes, rapid rehousing resources, tenant based rental assistance vouchers, project based vouchers, permanent supportive housing, etc.
- Smaller workgroups have been established to work on specific goals in order to achieve Functional Zero. The following workgroups are meeting on monthly basis: 1) Project Coordination 2) Affordable Housing 3) Housing Stability and Supports 4) Temporary Housing Accommodations and 5) Solution Specialist. Workgroup project tracking can be found [here](#).

### **Youth Action Board --**

- The action board has been helping support the Youth Committee by providing feedback on the Youth Homelessness Demonstration Project (YHDP) application.

### **CERA (COVID Emergency Rental Assistance) –**

- As of June 14<sup>th</sup>, 16,126 applications have been received in Kent County. Of those, 8,441 have been approved and 1,515 are in progress.
- A total of \$45,039,736 has been distributed with an average of \$5,336 per household.

## ESG Financial Assistance Report

Recipient/Subrecipient	Grant Term	Total Grant Amount	Direct Financial Assistance Amount	Activities Funded	% of Grant Term Complete	Total Amount Spent	% Spent	Planned # of Households Served	# of Households Served Grant Term to Date	Special Population(s) Served	Data Reported as of
<b>MSHDA*</b>											
CoC staff are working with the HWMUW Finance Team to determine the best method for including data in a monthly or quarterly format											
<b>City of Grand Rapids**</b>											
ESG - Community Rebuilders	7/1/2021 - 6/30/2022	\$250,818	\$170,900	RRH	92%	160,507	64%	36	32		5/31/2022
ESG - The Salvation Army	7/1/2021 - 6/30/2022	\$83,000	\$57,854	Prevention/ Eviction Diversion	92%	62,637	75%	25	12		5/31/2022
ESG-CV - Community Rebuilders	11/1/2020-7/31/2022	\$1,185,418	\$597,091	RRH	90%	1,032,477	87%	75	113	Geographically Targeted	5/31/2022
ESG-CV - Community Rebuilders	11/1/2020-7/31/2022	\$555,672	\$0	Shelter	90%	536,160	96%	70	59	Geographically Targeted	5/31/2022
ESG-CV - Community Rebuilders	11/1/2020-7/31/2022	\$186,423	\$98,884	Prevention	90%	186,423	100%	85	85		5/31/2022
ESG-CV - Community Rebuilders	11/1/2020-7/31/2022	\$22,167	\$0	HMIS	90%	22,167	100%	N/A	N/A		5/31/2022
ESG-CV - Community Rebuilders	11/1/2020-7/31/2022	\$58,622	\$0	Outreach	90%	58,622	100%	200	200		5/31/2022
<b>Kent County***</b>											
ESG 18	8/10/18-12/31/20	\$136,428	\$126,196	Prevention/ Hotel/Motel	100%	\$85,836.08	63%	34	not currently collected		3/31/2022
ESG 19	7/01/19 - 6/30/21	\$149,297	\$138,100	Prevention/ Hotel/Motel	100%	\$92,886.53	62%	49	not currently collected		3/31/2022
ESG 20	7/01/20 - 6/30/22	\$154,368	\$142,790	Prevention/ Hotel/Motel	75%	\$5,661.97	4%	45	not currently collected		3/31/2022
ESG-CV	4/01/20 - 9/30/22	\$1,643,522	\$1,479,169	Prevention/ Hotel/Motel	80%	\$295,881.72	18%	231	126		3/31/2022
ESG 21	7/01/21 - 6/30/23	\$148,422	\$137,290	Prevention/ Hotel/Motel	13%	\$0.00	0%		not currently collected		3/31/2022

**Notes**

\*MSHDA reports are submitted quarterly

\*\*City of Grand Rapids payment requests are due monthly. ESG-CV performance reports are due monthly, and ESG reports are due quarterly.

\*\*\*The County did enter into a two subrecipient agreements earlier this year (2021) with Family Promise of Grand Rapids for a portion of its 2018 and 2019 ESG Funds.

More recently the County also entered an agreement with Family Promise of Grand Rapids to use its ESG-CV funds to also provide hotel/motel vouchers.

## Continuum of Care Grant Financial Status

As of April 30, 2022

Grant	Grant Award Amount	Total Projected Expenses	Over Spent or Need to Spend	Grant Year End Date
HWMUW (Match)	\$ 17,000.00	20,924.77	3,924.77	6/30/2022
MSHDA ESG 21.22	\$ 456,049.00	-	(456,049.00)	9/30/2022
MSHDA ESG 20.21	\$ 369,419.00	361,386.00	(8,033.00)	12/31/2021
MSHDA EHV	\$ 174,000.00	174,000.00	0.00	9/30/2023
MSHDA CV	\$ 1,258,866.00	1,121,378.60	(137,487.40)	9/30/2022
CITY OF GR CDBG (MATCH)	\$ 20,050.00	25,861.50	5,811.50	6/30/2022
CITY OF WYOMING CDBG (MATCH)	\$ 5,000.00	4,901.18	(98.82)	6/30/2022
HUD PLANNING 11.30.22	\$ 206,850.00	189,497.69	(17,352.31)	11/30/2022
KENT COUNTY CUNP 12.31.22 (MATCH)	\$ 20,000.00	7,927.26	(12,072.74)	12/31/2022
HMIS SALVATION ARMY 11.30.22	\$ 77,458.00	72,515.08	(4,942.92)	11/30/2022
NPTA	\$ 5,000.00	4,900.00	(100.00)	12/31/2022
KENT COUNTY CDBG	\$ 10,000.00	10,000.00	0.00	6/30/2022
<b>Total</b>	<b>\$ 2,619,692.00</b>	<b>\$ 1,993,292.08</b>	<b>(626,399.92)</b>	

### Notes

\$4,000 Mission Matters Strategic Planning

Waiting on budget amendment approval to submit last expenses

Submitted Q1 2022 FSR

Waiting on budget amendment

Projected overspend offset by underspend in ENTF

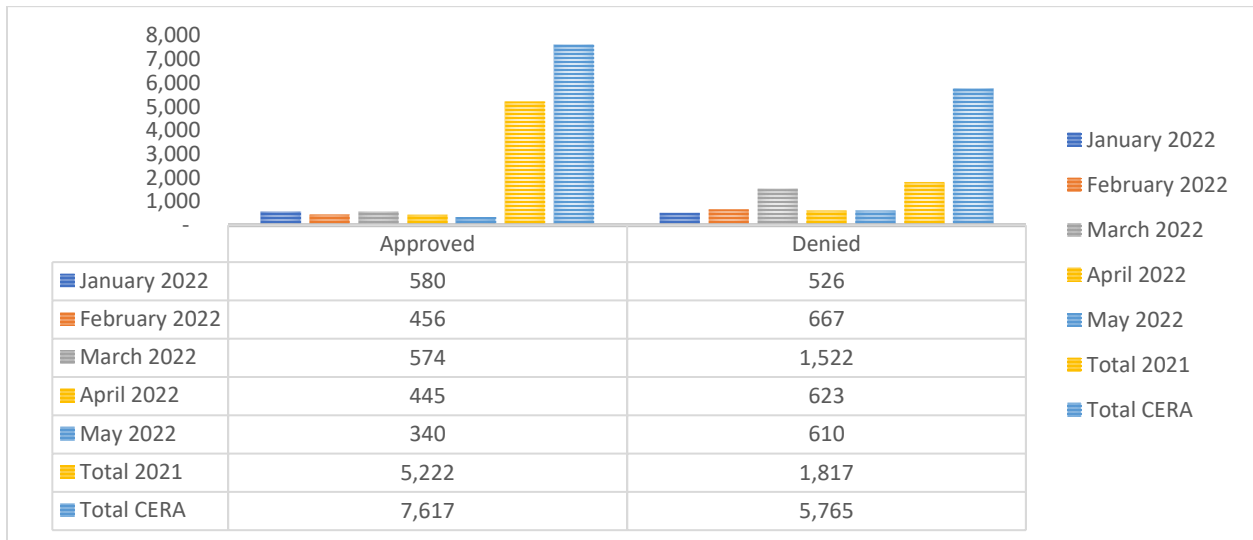
Quarter	Rocks by 15th following each quarter	Lead	Review		6/1
			Measure	Result	
Q2 - FY22	Complete and share Implementation Plan for CE Redesign				In process
Q2 - FY22	<b>Develop CoC recruitment strategy to increase stakeholder representation</b>				In process
Q2 - FY22	<b>Engage with consultant around Advisory Council recruitment (updated)</b>				Updated goal
Q2 - FY22	Identify framework for coordinated community response for prevention (action item: total 2020 prevention funding in Kent County)				In process
Q2 - FY22	Hold 2-3 CoC info sessions re:strategic plan and CoC initiatives with community leaders				In process
Q2 - FY22	<b>Publish annual brief and report</b>				in process
Q2 - FY22	Define functional zero for families, chronic, and youth in our community and what it looks like to work towards functional zero				in process
Q2 - FY22	<b>Through MI Racial Equity Strategic Planning, assess the current status of equity objectives and available data</b>	<b>Reliant on MCAH process</b>			In process
Q2 - FY22	Communicate a quarterly data sharing protocol - include process for reporting out to other stakeholders, ie quarterly report highlighting strengths and oppurtuntites; Steering Calendar				In process
	<b>Bold = high priority</b>				

## KENT COUNTY CERA STATUS

**6.1. 2022**

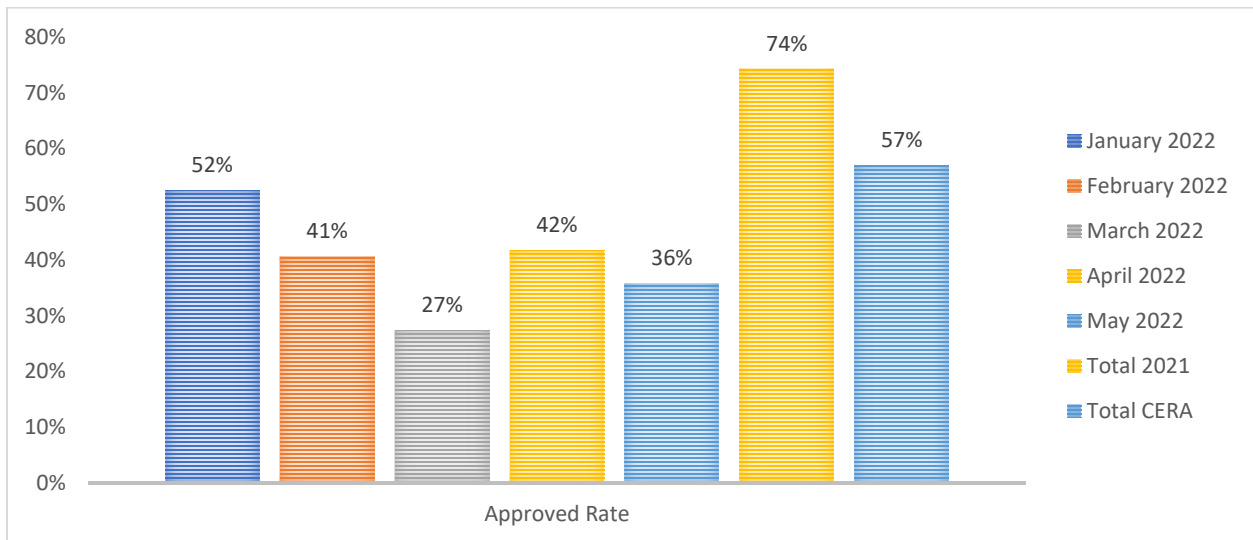
### Applications Approved vs Denied:

Summary: Over 7,600 applications have been approved, the number of denials has stayed steady above 600 per month. Approvals have slowly declined as we move further away from the March 30, 2022, cutoff date for eligible rental arrears. Denials include duplicate applications.



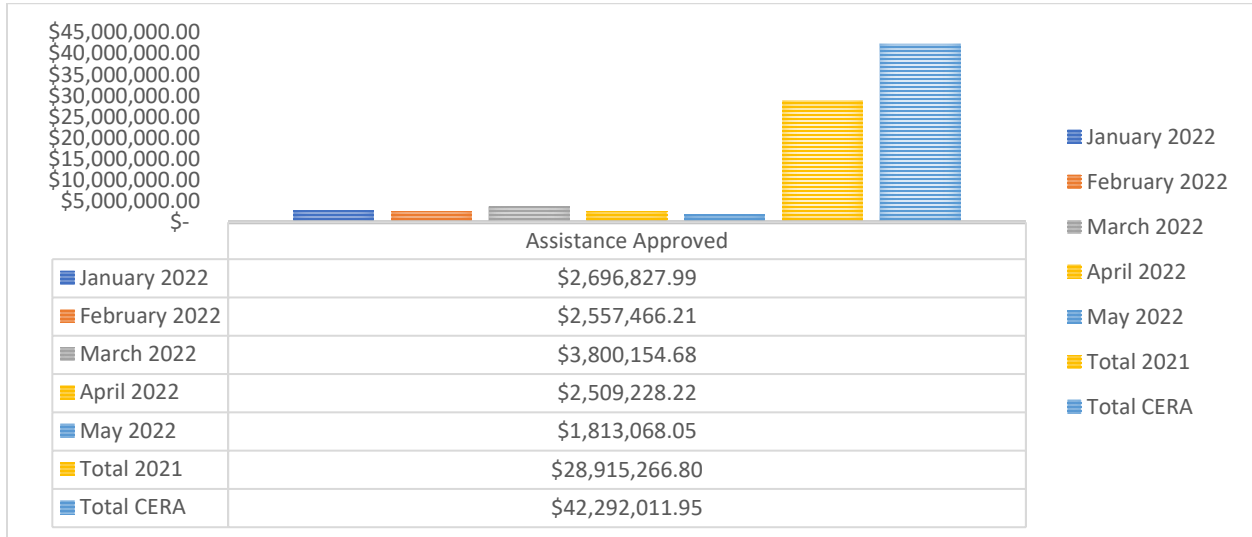
### Application Approval Rate: 36%

Summary: Approval rate is down slightly this month compared to May at 36%, the March 30, 2022, cut-off date for eligible arrears is restricting our ability to approve more applications. We have advocated for that date to be pushed back and are awaiting a response from MSHDA.



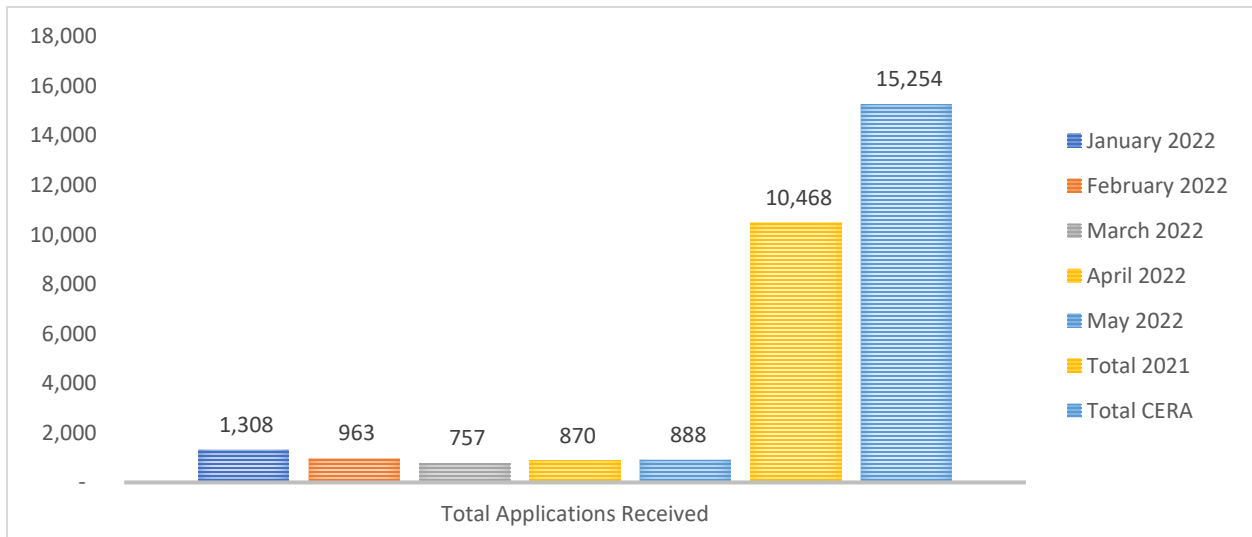
**Financial Assistance Approved: \$42,292,011.95**

Summary: Total assistance approved is over 42 million in Kent County through May, we have spent down 41% of CERA 2 and 88% of CERA 1. We have approximately \$18.1 million left to spend in CERA 1 and CERA 2 as of May 31, 2022.



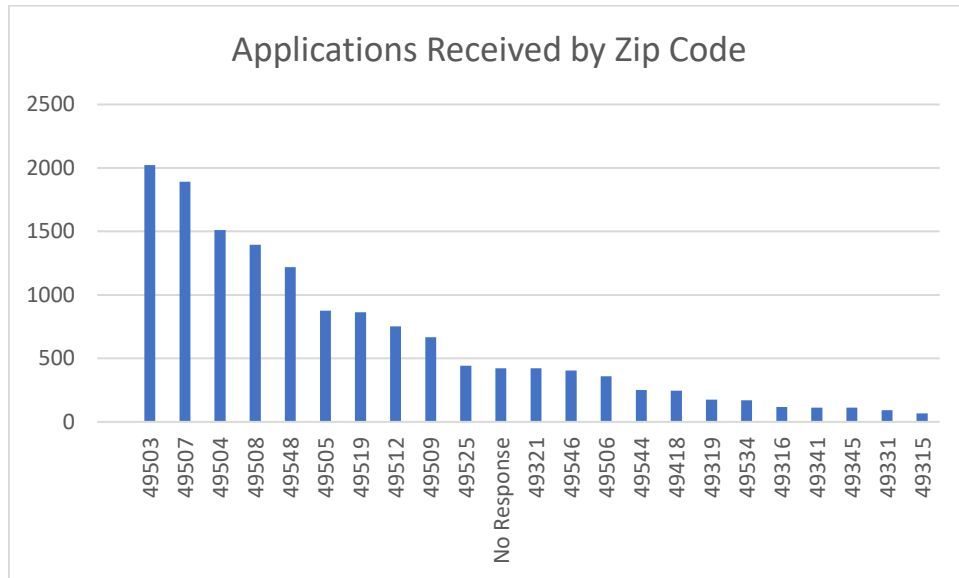
**Total Received Applications: 15,254**

Summary: We are held steady and saw an average of 220 applications per week in May. **We anticipate a sharp increase in June due to the scheduled portal closure on June 30, 2022, by MSHDA.**



## Demographics: Applications Received by Zip Code

Summary: The same zip codes are in the top 5, the only zip codes illustrated are those with 25 or more applications received.

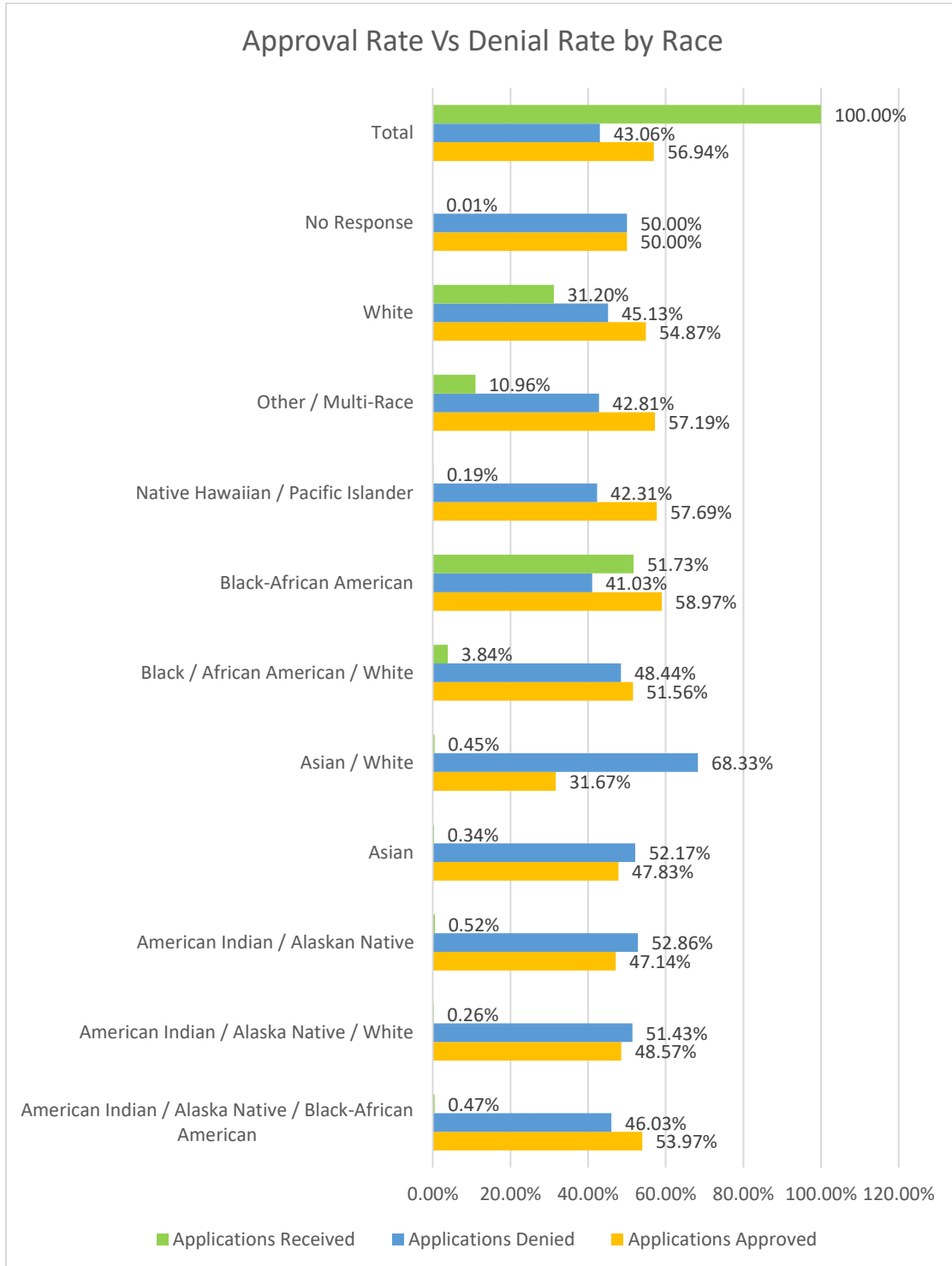


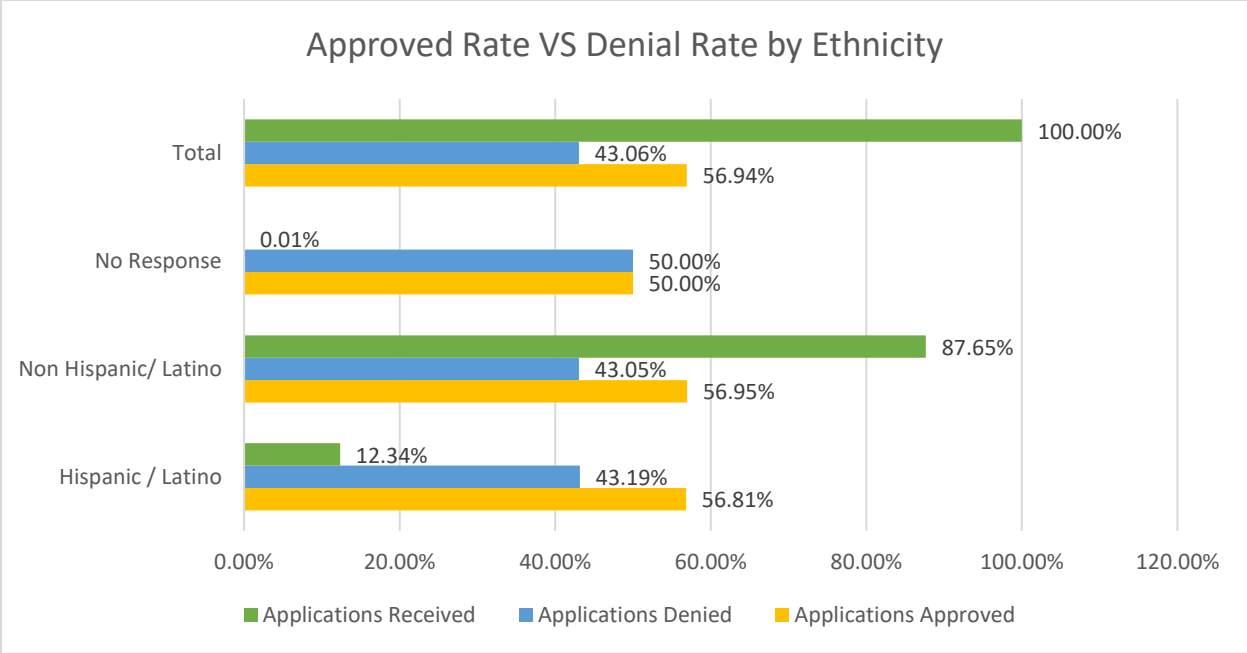
49503	2023	49321	421
49507	1891	49546	405
49504	1510	49506	359
49508	1396	49544	252
49548	1219	49418	245
49505	877	49319	174
49519	864	49534	171
49512	753	49316	117
49509	667	49341	112
49525	443	49345	111
No Response	422	49331	92
		49315	66



**Demographics: Race and Ethnicity based on Applications Denied and Approved.**

Summary: The largest groups showing the greatest need are still Black-African, White and Other/Multi-Race. The percentage of applications approved vs denied between each race group are in line with the percentage of those received. With Ethnicity, the percentages remain very similar from the previous month.





### CERA Dashboard as of 6.1.2022

\*Approved Cases include those that were processed by MSHDA directly

\* Total assistance includes funds that are still in processing

County: KENT

**Applications Received**  
15,592

Processed 14,086			In Progress 1,506		
Approved 8,173	Denied 4,930	Duplicate 983	Processing 35	Not Complete 173	Under Review 1,298

**\$43,922,394**

As of Jun 01	Other Assistance \$1,036,277
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 Rent \$37,531,026	 Electricity \$3,555,350	 Water \$293,452	 Heating \$1,496,517	 Sewer \$9,772
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Total People Assisted 9,896	Avg. Assistance Per Person \$4,438	Avg. Assistance Per Household \$5,374
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Avg. Household Size  
1



## **DRAFT FAIR HOUSING AND ANTI-DISCRIMINATION POLICY**

### **Introduction**

The Grand Rapids Area Coalition to End Homelessness, also known as the Grand Rapids/Wyoming/Kent County Continuum of Care and here forward referenced as the “Coalition”, is committed to making homelessness rare, brief, and non-recurring throughout Kent County. In its approach to ending homelessness, the Coalition is committed to ensuring the safety, dignity, and well-being of all individuals and families in services and programs associated with the Coalition. The following sections outline ways in which Coalition member agencies can ensure any person seeking services is treated fairly and respectfully.

It is the policy and practice of the Coalition that no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to unlawful discrimination under any of its projects, services, or activities.

### **Applicability**

All projects, services or activities funded through HUD Continuum of Care (CoC) Program or Emergency Solutions Grant (ESG) Program grants or receiving other funds from the Coalition as “the recipient”, including subrecipient organizations administering CoC and ESG projects, shall operate in accordance with this policy, following all applicable law. Programs must affirmatively provide equal access to their housing and supportive services in a nondiscriminatory manner that ensures that all persons are afforded equal opportunities. All Coalition member agencies are encouraged to be in compliance with this policy, regardless of whether or not they receive CoC or ESG funds. All agencies should be aware of applicable nondiscrimination laws that relate to their programs and services.

As part of the local funding process, applicants for CoC and ESG funds will be asked to demonstrate how they ensure clients are provided information on their Fair Housing rights through the intake process and applicable Fair Housing policy(ies). Agencies will also be asked to annually report the number of grievances levied for Funding Review Committee consideration.

### **Applicable Laws & Regulations**

CoC and ESG projects must operate in compliance with federal nondiscrimination and equal opportunity requirements, including the Fair Housing Act, Title VI of the Civil Rights Act, the Age Discrimination Act of 1975, Section 504 of the Rehabilitation Act, and the Americans with



Disabilities Act. The requirements of the HUD's Equal Access to Housing Final Rule and Equal Access in Accordance with Gender Identity Final Rule, 24 CFR 5.100, 5.105(a)(2) and 5.106(b), and the requirements of Executive Orders regarding equal employment opportunity and opportunities for minority and female owned businesses also apply. Please see 24 CFR 5.105 for a full list of applicable federal laws, regulations, and Executive Orders.

**(1) (a) Fair Housing Act**

The Fair Housing Act prohibits discrimination on the basis of race, color, religion, sex, disability, familial status, and national origin (protected classes). It applies to housing, regardless of the type of funding or ownership, including housing operated by private individuals, organizations that receive federal financial assistance, housing owned or operated by state and local governments, shelters that house persons for more than a few days, transitional housing facilities, and permanent housing facilities. The Fair Housing Act also prohibits harassment on the basis of a protected class and protects against retaliation for exercising fair housing rights.

(1) While people with limited English proficiency are not a protected class, national origin is a protected class and it may be closely linked to the ability to communicate proficiently in English. Housing providers therefore are prohibited from using limited English proficiency selectively or as an excuse for intentional housing discrimination.

**(b) Affirmatively Furthering Fair Housing.** Recipients and subrecipients must implement the CoC and ESG programs in a manner that affirmatively furthers Fair Housing, which means the recipient must:

- (1) Affirmatively market their housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities;
- (2) Where a recipient encounters a condition or action that impedes fair housing choice for current or prospective program participants, provide such information to the jurisdiction that provided the certification of consistency with the Consolidated Plan; and
- (3) Provide program participants with information on rights and remedies available under applicable federal, State and local fair housing and civil rights laws.

**(2) (a) Nondiscrimination and equal opportunity requirements.** The nondiscrimination and equal opportunity requirements set forth in 24 CFR 5.105(a) are applicable.

**(b) Housing for specific subpopulations.** Recipients and subrecipients may exclusively serve a particular homeless subpopulation in transitional or permanent housing if the housing addresses a need identified by the Continuum of Care for the geographic area and meets one of the following:



(1) The housing may be limited to one sex where such housing consists of a single structure with shared bedrooms or bathing facilities such that the considerations of personal privacy and the physical limitations of the configuration of the housing make it appropriate for the housing to be limited to one sex.

(2) The housing may be limited to a specific subpopulation, so long as admission does not discriminate against any protected class under federal nondiscrimination laws in 24 CFR 5.105 (e.g., the housing may be limited to homeless veterans, victims of domestic violence and their children, or chronically homeless persons and families).

(3) The housing may be limited to families with children.

(4) If the housing has in residence at least one family with a child under the age of 18, the housing may exclude registered sex offenders and persons with a criminal record that includes a violent crime from the project so long as the child resides in the housing.

(5) Sober housing may exclude persons who refuse to sign an occupancy agreement or lease that prohibits program participants from possessing, using, or being under the influence of illegal substances and/or alcohol on the premises.

(6) If the housing is assisted with funds under a federal program that is limited by federal statute or Executive Order to a specific subpopulation, the housing may be limited to that subpopulation (e.g., housing also assisted with funding from the Housing Opportunities for Persons with AIDS program under 24 CFR part 574 may be limited to persons with acquired immunodeficiency syndrome or related diseases).

(7) Recipients may limit admission to or provide a preference for the housing to subpopulations of homeless persons and families who need the specialized supportive services that are provided in the housing (e.g., substance abuse addiction treatment, domestic violence services, or a high intensity package designed to meet the needs of hard-to-reach homeless persons). While the housing may offer services for a particular type of disability, no otherwise eligible individuals with disabilities or families including an individual with a disability, who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

**(c) Faith-Based Activities**

Recipient and subrecipient staff, volunteers, or contractors shall not, in providing program assistance, discriminate against a program participant or prospective participant on the basis of religion or religious belief. In providing services supported in whole or part with federal financial assistance and in outreach activities related to such services, programs shall not discriminate against current or prospective program beneficiaries on the basis of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

**(d) Accessibility and integrative housing and services for persons with disabilities.** Recipients and subrecipients must comply with the accessibility requirements of the Fair Housing Act (24



CFR part 100), Section 504 of the Rehabilitation Act of 1973 (24 CFR part 8), and Titles II and III of the Americans with Disabilities Act, as applicable (28 CFR parts 35 and 36). In accordance with the requirements of 24 CFR 8.4(d), recipients must ensure that their program's housing and supportive services are provided in the most integrated setting appropriate to the needs of persons with disabilities.

**(e) Prohibition against involuntary family separation.** The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives funds under this part. In compliance with CoC Program Interim Rule 24 CFR 578.93(e), involuntary separation is prohibited in projects funded through CoC and ESG dollars. CoC- and ESG-funded projects may not deny admission to any household on the basis of:

- Age and gender of a child under 18, or
- Gender or marital status of a parent or parents.

### **(3) (a) Reasonable accommodations and modifications**

Recipients and subrecipients will make reasonable accommodations and modifications in policies and programs to afford qualified residents and applicants with disabilities an equal opportunity to participate in its programs, services, or activities. A reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service that allows a person with a disability to use and enjoy housing, including public and common use areas. CoC and ESG programs will, upon request, grant reasonable accommodations to provide appropriate aids and services leading to effective communication for qualified residents and applicants with disabilities so they can participate equally in programs, services, or activities, including qualified sign language interpreters, documents in Braille, or other ways of making information and communications accessible to people who have speech, hearing, or vision impairments. Subrecipients must comply with requirements to make reasonable accommodations and modifications.

### **(4) (a) Equal Access in Housing**

The Equal Access in Housing Final Rule (the Rule) published in 2012 ensures HUD's programs serve participants, regardless of sexual orientation, gender identity, family composition, or marital status. CoC and ESG programs cannot discriminate based on the composition of the family (e.g., adults and children or just adults), the age of any members of the family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. The Rule also set a standard definition of family:

- Includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, persons presenting for assistance together with or



without children and irrespective of age, relationship, or whether or not a member of the household has a disability.

- A child temporarily away from the home because of placement in foster care is considered a member of the family.
- CoC-funded programs:
  - Must have updated policies and procedures that reflect the requirements.
  - May exclude families without minor children if the project was funded solely to serve families with children. However, the project must serve all types of families with children that are otherwise eligible for assistance, including families with children headed by a single adult or consisting of multiple adults (with at least one child) who reside together.
  - May serve a single sex only if the project: 1) serves adults only (no minors), and 2) has a physical configuration such that privacy is a concern, specifically shared bathing areas or shared sleeping areas.

**(b) Equal Access in Accordance with Gender Identity**

Further, the Equal Access in Accordance with Gender Identity Final Rule published in 2016 ensures equal access to assistance in accordance with gender identity in HUD’s Community Planning and Development (CPD) programs, including, but not limited to, the ESG (24 CFR part 576) and CoC (24 CFR part 578) programs. The requirements of this section apply to recipients and subrecipients, as well as to owners, operators, and managers of shelters and other buildings and facilities and providers of services funded in whole or in part by any CPD program.

- Admissions, occupancy, and operating policies and procedures, including policies and procedures to protect privacy, health, safety, and security, shall be established or amended, as necessary, and administered in a nondiscriminatory manner to ensure that:
  - Equal access to CPD programs, shelters, other buildings and facilities, benefits, services, and accommodations is provided to an individual in accordance with the individual’s gender identity, and in a manner that affords equal access to the individual’s family;
  - An individual is placed, served, and accommodated in accordance with the gender identity of the individual;
  - An individual is not subjected to intrusive questioning or asked to provide anatomical information or documentary, physical, or medical evidence of the individual’s gender identity; and
  - Eligibility determinations are made and assisted housing is made available in CPD programs as required by § 5.105(a)(2).



- Placement and accommodation of an individual in temporary, emergency shelters and other buildings and facilities with physical limitations or configurations that require and are permitted to have shared sleeping quarters or shared bathing facilities shall be made in accordance with the individual's gender identity.
- Post-admission accommodations: A recipient, subrecipient, owner, operator, manager, or provider must take nondiscriminatory steps that may be necessary and appropriate to address privacy concerns raised by residents or occupants and, as needed, update its admissions, occupancy, and operating policies and procedures in accordance with this section.

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## **Appendix A: Guidance for Subrecipient Creation of Nondiscrimination and Fair Housing Policies**

- Policy should state that agency does not discriminate and complies with all nondiscrimination, fair housing, and equal opportunity laws.
- Policy should indicate the availability of aids and services, upon request, to ensure effective communication, such as the availability of qualified sign language interpreters, documents in Braille, or other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.
- Policy should state that the agency will make reasonable accommodations in rules, policies, and services to give a person with a disability equal opportunity to occupy and enjoy the full use of a housing unit.
- If the agency acts as a landlord, the policy should state that the agency will permit reasonable modification to the premises if the modification is necessary to allow full use of the premises.
- Policy should provide contact information for submitting a complaint or reporting discrimination.

## **Appendix B: Strategies to Implement the Equal Access to Housing Rule**

Programs must develop, in writing, implement and document procedures to ensure implementation of the Equal Access Rule. Specific strategies or procedures may include but are not limited:

### 1) Inclusive Policy Standards

### 2) Anti-discrimination policies and procedures that:

- Ensure placement and accommodation are made in accordance with an individual's gender identity.
- Ensure agency uses appropriate, inclusive language in communications, publications, trainings, personnel handbooks and other policy documents that affirms the agency's commitment to serving all eligible clients in adherence with the Equal Access Rule.
- Have an anti-harassment policy that includes transgender and non-gender conforming in the list of groups vulnerable to harassment and/or list of protected groups.
- Have a formal grievance process that is prompt, transparent and consistent in managing and resolving violations.
- Include confidentiality practices that keep's a client transgender status confidential, unless the client gives permission to share this information.
- Allows for clients to request a private space for intake and data collection.



- Outlines safety practices including respecting the client’s evaluation of their own safety practice with regard to proposed housing options and accommodating reasonable clients request regarding safety.

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