

## Before Starting the CoC Application

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

The Collaborative Applicant is responsible for:

1. Reviewing the FY 2017 CoC Program Competition NOFA in its entirety for specific application and program requirements.
2. Ensuring all questions are answered completely.
3. Reviewing the FY 2017 CoC Consolidated Application Detailed Instructions, which gives additional information for each question.
4. Ensuring all imported responses in the application are fully reviewed and updated as needed.
5. The Collaborative Applicant must review and utilize responses provided by project applicants in their Project Applications.
6. Some questions require the Collaborative Applicant to attach documentation to receive credit for the question. This will be identified in the question.

- Note: For some questions, HUD has provided documents to assist Collaborative Applicants in filling out responses. These are noted in the application.

- All questions marked with an asterisk (\*) are mandatory and must be completed in order to submit the CoC Application.

For CoC Application Detailed Instructions click [here](#).

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

### **Instructions:**

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**1A-1. CoC Name and Number:** VI-500 - Virgin Islands CoC

**1A-2. Collaborative Applicant Name:** Virgin Islands CoC

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

**1A-4. HMIS Lead:** Methodist Training & Outreach Center, Inc.

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

**Instructions:**

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**1B-1. From the list below, select those organization(s) and/or person(s) that participate in CoC meetings. Using the drop-down boxes, indicate if the organization(s) and/or person(s): (1) participate in CoC meetings; and (2) vote, including selection of CoC Board members. Responses should be for the period from 5/1/16 to 4/30/17.**

Organization/Person Categories	Participates in CoC Meetings	Votes, including electing CoC Board Members
Local Government Staff/Officials	Yes	Yes
CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes
Law Enforcement	Yes	Yes
Local Jail(s)	No	No
Hospital(s)	No	No
EMT/Crisis Response Team(s)	No	No
Mental Health Service Organizations	No	No
Substance Abuse Service Organizations	Yes	Yes
Affordable Housing Developer(s)	Yes	Yes
Disability Service Organizations	Yes	Yes
Disability Advocates	No	No
Public Housing Authorities	No	No
CoC Funded Youth Homeless Organizations	Not Applicable	No
Non-CoC Funded Youth Homeless Organizations	Not Applicable	No
Youth Advocates	Not Applicable	No
School Administrators/Homeless Liaisons	No	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	Not Applicable	No
LGBT Service Organizations	Not Applicable	No
Agencies that serve survivors of human trafficking	Not Applicable	No
Other homeless subpopulation advocates	Yes	Yes
Homeless or Formerly Homeless Persons	Yes	Yes
Other:(limit 50 characters)		

Federally Qualified Health Center	Yes	Yes

**Applicant must select Yes, No or Not Applicable for all of the listed organization/person categories in 1B-1.**

**1B-1a. Describe the specific strategy(s) the CoC uses to solicit and consider opinions from organizations and/or persons that have an interest in preventing or ending homelessness. (limit 1000 characters)**

The primary strategy employed by the VICOc to ensure that it considers opinions from organizations and/or persons that have an interest in preventing or ending homelessness is by inviting as many of such organizations as possible to become participating members of the CoC. The general membership of the CoC meets monthly; the monthly meeting serves as a forum for discussion and sharing of opinions by the various organizations that are represented.

**1B-2. Describe the CoC's open invitation process for soliciting new members, including any special outreach. (limit 1000 characters)**

Growing the membership has been a focus of the CoC over the past months. During the period, the CoC has actively attempted to recruit new members through invitation by e-mail, telephone, and personal contact. The VICOc has reached out to various entities for participation as follows: law enforcement, the public hospitals in each district, University of the Virgin Islands, community foundations to include the United Way, the local PHA, the Chambers of Commerce, additional social service and mental health providers, and faith-based organizations. These efforts have resulted in the participation of additional individuals representing the Virgin Islands Police Department, St. Croix Foundation for Community Development, and the Virgin Islands Development Disabilities Council. The Coc is planning to implement a public, annual invitation drive to invite new members.

**1B-3. Describe how the CoC notified the public that it will accept and consider proposals from organizations that have not previously received CoC Program funding in the FY 2017 CoC Program Competition, even if the CoC is not applying for new projects in FY 2017. The response must include the date(s) the CoC made publicly knowing they were open to proposals. (limit 1000 characters)**

The VICOc has been challenged by a lack of funding for the most basic functions - to include publication of ads in the local media notifying the public of the availability of funds and soliciting proposals from new organizations interested in applying for funds for eligible projects. This funding cycle marks the first time that the CoC is applying for a Planning Grant. One of the budget

line items included in the Planning Grant funding request is the sum of \$2,000 to help defray the cost of public advertising of the funding availability and the application process as required.

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

**Instructions:**

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**1C-1. Using the chart below, identify the Federal, State, Local, Private and Other organizations that serve homeless individuals, families, unaccompanied youth, persons who are fleeing domestic violence, or those at risk of homelessness that are included in the CoCs coordination; planning and operation of projects. Only select "Not Applicable" if the funding source(s) do not exist in the CoC's geographic area.**

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)	No
Runaway and Homeless Youth (RHY)	Not Applicable
Head Start Program	No
Housing and service programs funded through Department of Justice (DOJ) resources	Not Applicable
Housing and service programs funded through Health and Human Services (HHS) resources	No
Housing and service programs funded through other Federal resources	No
Housing and service programs funded through state government resources	Not Applicable
Housing and service programs funded through local government resources	Yes
Housing and service programs funded through private entities, including foundations	No
Other:(limit 50 characters)	
	Not Applicable
	Not Applicable

**1C-2. Describe how the CoC actively consults with Emergency Solutions Grant (ESG) recipient's in the planning and allocation of ESG funds. Include in the response: (1) the interactions that occur between the CoC and the ESG Recipients in the planning and allocation of funds; (2) the CoCs participation in the local Consolidated Plan jurisdiction(s) process by providing Point-in-Time (PIT) and Housing Inventory Count (HIC) data to the Consolidated Plan jurisdictions; and (3) how the CoC ensures local homelessness information is clearly communicated and addressed in Consolidated Plan updates. (limit 1000 characters)**

The process of coordination between the VICoC and the Emergency Solutions Grant recipient is ongoing because the ESG recipient is a fully participating member and serves as the Collaborative Applicant for the CoC. In the FY 2017

ESG grant cycle, funds were made available to the HMIS Lead Agency to help defray the cost of operating the HMIS and ensuring that adequate training, software licences etc. are made available. Point-in-Time (PIT) and Housing Inventory Count (HIC) data is shared with the VIHFA which agency is tasked with the preparation of the Territory's Consolidated Plan and Annual Action Plan. The PIT and HIC data is incorporated into the Plan documents. In FY 2017, the

**1C-3. CoCs must demonstrate the local efforts to address the unique needs of persons, and their families, fleeing domestic violence that includes access to housing and services that prioritizes safety and confidentiality of program participants. (limit 1000 characters)**

As indicated below, the VICoC has yet to implement a Coordinated Entry System. Historically, the primary effort to address the unique needs of persons, and their families, fleeing domestic violence - to include access to housing and services that prioritize the safety and confidentiality of program participants - has been undertaken by victim service provider agencies. Safety and planning protocols for provision of housing and services to survivors of domestic violence while ensuring safety and confidentiality of those persons and other related topics are among those which remain to be addressed in the development of the Coordinated Entry System. The CoC has begun working with an experienced technical assistance provider who has committed to share various resources that will be used by the CES sub-committee to ensure that the appropriate protocols are incorporated in the system design. The VICOC has applied for an extension of the deadline to implement its CES until July 31, 2018.

**1C-3a. CoCs must describe the following: (1) how regular training is provided to CoC providers and operators of coordinated entry processes that addresses best practices in serving survivors of domestic violence; (2) how the CoC uses statistics and other available data about domestic violence, including aggregate data from comparable databases, as appropriate, to assess the scope of community needs related to domestic violence and homelessness; and (3) the CoC safety and planning protocols and how they are included in the coordinated assessment. (limit 1,000 characters)**

The VICoC has yet to implement a Coordinated Entry System. Development of the system framework began in early 2017; unfortunately, the work of the subcommittee was disrupted in September by the arrival of Hurricanes Irma and Maria which devastated the jurisdiction causing significant disruption of efforts as member organizations shifted focus to hurricane recovery. Safety and planning protocols for provision of services to survivors of domestic violence, assessment of comparable databases and data availability, and other related topics are among those which remain to be developed. The CoC has begun working with an experienced technical assistance provider who has committed to share various resources that will be used by the CES sub-committee to ensure that the appropriate protocols are incorporated in the system design. The VICOC has applied for an extension of the deadline to implement its CES until July 31, 2018.

**1C-4. Using the chart provided, for each of the Public Housing Agency's (PHA) in the CoC's geographic area: (1) identify the percentage of new admissions to the Public Housing or Housing Choice Voucher (HCV) Programs in the PHA's that were homeless at the time of admission; and (2) indicate whether the PHA has a homeless admission preference in its Public Housing and/or HCV program.**

**Attachment Required: If the CoC selected, "Yes-Public Housing", "Yes-HCV" or "Yes-Both", attach an excerpt from the PHA(s) written policies or a letter from the PHA(s) that addresses homeless preference.**

Public Housing Agency Name	% New Admissions into Public Housing and Housing Choice Voucher Program during FY 2016 who were homeless at entry	PHA has General or Limited Homeless Preference
Virgin Islands Housing Authority - Public Housing	19.00%	Yes-Public Housing
Virgin Islands Housing Authority - HCV	2.00%	No

**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-4a. For each PHA where there is not a homeless admission preference in their written policies, identify the steps the CoC has taken to encourage the PHA to adopt such a policy. (limit 1000 characters)**

The local PHA, Virgin Islands Housing Authority, presently has a limited homeless preference in its written admission policy; however, there is currently no parallel preference for its Housing Choice Voucher program.

**1C-5. Describe the actions the CoC has taken to: (1) address the needs of Lesbian, Gay, Bisexual, Transgender (LGBT) individuals and their families experiencing homelessness, (2) conduct regular 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, including Gender Identify Equal Access to Housing, Fina Rule; and (3) implementation of an anti-discrimination policy. (limit 1000 characters)**

To date, the VI CoC has not undertaken any actions to address the needs of LBGT individuals and their families experiencing homelessness and there is limited data available about this sub-population. Development of an anti-discrimination policy and also development of standard operating procedure relative to the implementation of HUD's policies regarding equal access to housing regardless of sexual orientation or gender identity are among topics for which the VICoC will plans to seek technical assistance if it is successful in

receiving a 2017 Planning Grant.

**1C-6. Criminalization: Select the specific strategies implemented by the CoC to prevent the criminalization of homelessness in the CoC's geographic area. Select all that apply.**

Engaged/educated local policymakers:	<input type="checkbox"/>
Engaged/educated law enforcement:	<input type="checkbox"/>
Engaged/educated local business leaders	<input type="checkbox"/>
Implemented communitywide plans:	<input type="checkbox"/>
No strategies have been implemented	<input checked="" type="checkbox"/>
Other:(limit 50 characters)	
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>

**At least one box must be checked.**

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

### Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**1D-1. Discharge Planning-State and Local: Select from the list provided, the systems of care the CoC coordinates with and assists in state and local discharge planning efforts to ensure those who are discharged from that system of care are not released directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply.**

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

**1D-1a. If the applicant did not check all the boxes in 1D-1, provide: (1) an explanation of the reason(s) the CoC does not have a discharge policy in place for the system of care; and (2) provide the actions the CoC is taking or plans to take to coordinate with or assist the State and local discharge planning efforts to ensure persons are not discharged to the street, emergency shelters, or other homeless assistance programs. (limit 1000 characters)**

Unfortunately, the Territory in general has struggled to implement a discharge planning policy with the listed systems of care. It is the intention of the CoC to incorporate coordination with these various systems as part of the Coordinated Entry System once it has been implemented.

**1D-2. Discharge Planning: Select the system(s) of care within the CoC's geographic area the CoC actively coordinates with to ensure persons who have resided in any of the institutions listed below longer than 90 days are not discharged directly to the streets, emergency shelters, or other homeless assistance programs. Check all that apply.**

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

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

### Instructions

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**1E-1. Using the drop-down menu, select the appropriate response(s) that demonstrate the process the CoC used to rank and select project applications in the FY 2017 CoC Program Competition which included (1) the use of objective criteria; (2) at least one factor related to achieving positive housing outcomes; and (3) included a specific method for evaluating projects submitted by victim service providers.**

**Attachment Required: Public posting of documentation that supports the process the CoC used to rank and select project application.**

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	No

**1E-2. Severity of Needs and Vulnerabilities**  
 CoCs must provide the extent the CoC considered the severity of needs and vulnerabilities experienced by program participants in their project ranking and selection process. Describe: (1) the specific vulnerabilities the CoC considered; and (2) how the CoC takes these vulnerabilities into account during the ranking and selection process. (See the CoC Application Detailed Instructions for examples of severity of needs and vulnerabilities.)  
 (limit 1000 characters)

During the current funding cycle, only two (2) renewal applications (one Permanent Supportive Housing project and one HMIS project) and one (1) new Permanent Housing Bonus project were properly submitted by applicants. All three projects were selected for ranking and are being submitted for funding consideration under the 2017 CoC Application. The specific vulnerabilities that were taken into consideration during the ranking were chronic homelessness and also homelessness co-occurring with current or past substance abuse or mental health issues. In the ranking process, the PSH renewal project was ranked as #1 in an effort to ensure that those persons already housed would continue to be stably housed. Although not directly serving program participants, the HMIS project was ranked as #2 because of the statutory requirement to maintain an HMIS system and the recognition that t

**1E-3. Using the following checklist, select: (1) how the CoC made publicly available to potential project applicants an objective ranking and selection process that was used for all project (new and renewal) at least 2 days before the application submission deadline; and (2) all parts of the CoC Consolidated Application, the CoC Application attachments, Priority Listing that includes the reallocation forms and Project Listings that show all project applications submitted to the CoC were either accepted and ranked, or rejected and were made publicly available to project applicants, community members and key stakeholders.**

**Attachment Required: Documentation demonstrating the objective ranking 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. Attachments must clearly show the date the documents were publicly posted.**

Public Posting	
CoC or other Website	<input type="checkbox"/>
Email	<input checked="" type="checkbox"/>
Mail	<input type="checkbox"/>
Advertising in Local Newspaper(s)	<input type="checkbox"/>
Advertising on Radio or Television	<input type="checkbox"/>
Social Media (Twitter, Facebook, etc.)	<input type="checkbox"/>

**1E-4. Reallocation: Applicants must demonstrate the ability to reallocate lower performing projects to create new, higher performing projects. CoC's may choose from one of the following two options below to answer this question. You do not need to provide an answer for both.**

Option 1: The CoC actively encourages new and existing providers to apply for new projects through reallocation.

Attachment Required - Option 1: Documentation that shows the CoC actively encouraged new and existing providers to apply for new projects through reallocation.

Option 2: The CoC has cumulatively reallocated at least 20 percent of the CoC's ARD between FY 2013 and FY 2017 CoC Program Competitions.

No Attachment Required - HUD will calculate the cumulative amount based on the CoCs reallocation forms submitted with each fiscal years Priority Listing.

**Reallocation: Option 1**

**Attachment Required - provide documentation that shows the CoC actively encouraged new and existing providers to apply for new projects through reallocation.**

**1E-5. If the CoC rejected or reduced project application(s), enter the date the CoC and Collaborative Applicant notified project applicants their project application(s) were being rejected or reduced in writing outside of e-snaps.** 02/13/2018

**Attachment Required: Copies of the written notification to project applicant(s) that their project application(s) were rejected. Where a project application is being rejected or reduced, the CoC must indicate the reason(s) for the rejection or reduction.**

**1E-5a. Provide the date the CoC notified applicant(s) their application(s) were accepted and ranked on the Priority Listing, in writing, outside of e-snaps.** 02/13/2018

**Attachment Required: Copies of the written notification to project applicant(s) their project application(s) were accepted and ranked on the Priority listing.**

## Reallocation Supporting Documentation

**Attachment Required - provide documentation that shows the CoC actively encouraged new and existing providers to apply for new projects through reallocation.**

Document Type	Required?	Document Description	Date Attached
Reallocation Supporting Documentation	No		

## Attachment Details

### Document Description:

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

**Intructions:**

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**2A-1. Does the 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?** Yes

**Attachment Required:** If “Yes” is selected, a copy of the sections of the Governance Charter, or MOU/MOA addressing the roles and responsibilities of the CoC and HMIS Lead.

**2A-1a. 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. In addition, indicate if the page number applies to the Governance Charter or MOU/MOA.** 1; Agency Agreement

**2A-2. Does the CoC have a HMIS Policies and Procedures Manual? Attachment Required: If the response was “Yes”, attach a copy of the HMIS Policies and Procedures Manual.** Yes

**2A-3. What is the name of the HMIS software vendor?** Eccovia Solutions

**2A-4. Using the drop-down boxes, select the HMIS implementation Coverage area.** Single CoC

**2A-5. Per the 2017 HIC use the following chart to indicate the number of beds in the 2017 HIC and in HMIS for each project type within the CoC. If a particular project type does not exist in the CoC then enter "0" for all cells**

**in that project type.**

Project Type	Total Beds in 2017 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter (ESG) beds	83	27	43	76.79%
Safe Haven (SH) beds	0	0	0	
Transitional Housing (TH) beds	49	5	44	100.00%
Rapid Re-Housing (RRH) beds	29	0	29	100.00%
Permanent Supportive Housing (PSH) beds	69	0	69	100.00%
Other Permanent Housing (OPH) beds	0	0	0	

**2A-5a. To receive partial credit, if the bed coverage rate is below 85 percent for any of the project types, the CoC must provide clear steps on how it intends to increase this percentage for each project type over the next 12 months.**

**(limit 1000 characters)**

The stated bed coverage rate is greater than 85%.

**2A-6. Annual Housing Assessment Report (AHAR) Submission: How many Annual Housing Assessment Report (AHAR) tables were accepted and used in the 2016 AHAR?** 7

**2A-7. Enter the date the CoC submitted the 2017 Housing Inventory Count (HIC) data into the Homelessness Data Exchange (HDX).** 04/18/2017  
**(mm/dd/yyyy)**

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

### Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**2B-1. Indicate the date of the CoC's 2017 PIT count (mm/dd/yyyy). If the PIT count was conducted outside the last 10 days of January 2017, HUD will verify the CoC received a HUD-approved exception.** 01/27/2017

**2B-2. Enter the date the CoC submitted the PIT count data in HDX. (mm/dd/yyyy)** 04/16/2017

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

### Instructions:

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**2C-1. Describe any change in the CoC's sheltered PIT count implementation, including methodology and data quality changes from 2016 to 2017. Specifically, how those changes impacted the CoCs sheltered PIT count results. (limit 1000 characters)**

No change was reported in the methodology used for the 2017 count. HMIS data and provider-level surveys were the data sources that were used to produce the total number of persons included in the count of the sheltered population. Information was collected from all the emergency shelters and transitional housing projects listed on the HIC. Personally identifying information - e.g., name, date of birth, and Social Security number- was used to ensure that there was no duplication in the count of sheltered persons.

**2C-2. Did your CoC change its provider coverage in the 2017 sheltered count?** No

**2C-2a. If "Yes" was selected in 2C-2, enter the change in provider coverage in the 2017 sheltered PIT count, including the number of beds added or removed due to the change.**

Beds Added:	0
Beds Removed:	0
Total:	0

**2C-3. 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 2017 sheltered PIT count?** No

**2C-3a. If "Yes" was selected in 2C-3, enter the number of beds that were added or removed in 2017 because of a Presidentially declared disaster.**

Beds Added:	0
Beds Removed:	0

Total:	0
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**2C-4. Did the CoC change its unsheltered PIT count implementation, including methodology and data quality changes from 2016 to 2017?** Yes

CoCs that did not conduct an unsheltered count in 2016 or did not report unsheltered PIT count data to HUD in 2016 should compare their efforts in 2017 to their efforts in 2015.

**2C-4a. Describe any change in the CoC’s unsheltered PIT count implementation, including methodology and data quality changes from 2016 to 2017. Specify how those changes impacted the CoC’s unsheltered PIT count results. See Detailed Instructions for more information. (limit 1000 characters)**

It is widely believe that the 2017 PIT counts were more successful due to the collaborative efforts of other CoC agencies which resulted in a larger turnout of community volunteers. The number of volunteers had a great impact on the number of areas that were covered, hence increasing the overall counts obtained. , the count increased approximately 22% -up from 252 in 2015 to 307.

For the 2017 count, there was a methodology change whereby the time frame for the count was expanded to a 24-hour period rather than a single data point. [In the previous count (2015), the unsheltered count was conducted at a specific time]. The approach that was used was a "night of the count - known locations" . Areas were selected for canvassing based on local knowledge of areas with concentrations of homeless persons. Within the areas that were canvassed, all persons encountered during the count were counted. By canvassing the different areas at the same specific time, duplication was avoided.

**2C-5. Did the CoC implement specific measures to identify youth in their PIT count?** No

**2C-5a. If "Yes" was selected in 2C-5, describe the specific measures the CoC; (1) took to identify homeless youth in the PIT count; (2) during the planning process, how stakeholders that serve homeless youth were engaged; (3) how homeless youth were engaged/involved; and (4) how the CoC worked with stakeholders to select locations where homeless youth are most likely to be identified. (limit 1000 characters)**

Not applicable; no specific measures were undertaken to identify youth in the 2017 PIT count.

**2C-6. Describe any actions the CoC implemented in its 2017 PIT count to better count individuals and families experiencing chronic homelessness,**

**families with children, and Veterans experiencing homelessness.  
(limit 1000 characters)**

In preparation for the 2017 PIT count, the CoC engaged in additional outreach to other agencies in an effort to ensure a more accurate count. In addition, the time frame for the count was expanded to a 24-hour period rather than a single data point.

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

### Instructions

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**3A-1. Performance Measure: Reduction in the Number of First-Time Homeless. Describe: (1) the numerical change the CoC experienced; (2) the process the CoC used to identify risk factors of becoming homeless for the first time; (3) the strategies in place to address individuals and families at risk of becoming homeless; and (4) the organization or position that is responsible for overseeing the CoC's strategy to reduce or end the number of individuals and families experiencing homelessness for the first time.  
(limit 1000 characters)**

The number of first-time homeless reported for 2017 was 145 which represents an increase of 7 persons (= 5%) from FY 2015 at which time the reported count was 138. During the period, the strategies employed to address individuals and families at risk of becoming homeless include referrals to ESG subrecipient agencies that provide homeless prevention services. As part of the development of the CES, the CoC is compiling a resource guide (hard copy and electronic) which will serve as a listing of housing providers and social service agencies in an effort to ensure that there is widespread knowledge of the community resources available to assist at-risk persons or families.

**3A-2. Performance Measure: Length-of-Time Homeless. CoC 's must demonstrate how they reduce the length-of-time for individuals and families remaining homeless. Describe (1) the numerical change the CoC experienced; (2) the actions the CoC has implemented to reduce the length-of-time individuals and families remain homeless; (3) how the CoC identifies and houses individuals and families with the longest length-of-time homeless; and (4) identify the organization or position that is responsible for overseeing the CoC's strategy to reduce the length-of-time individuals and families remain homeless.  
(limit 1000 characters)**

The average length-of-time (LOT) persons remain homeless measured in bed-nights reported for 2017 (total for emergency shelter and transitional housing) was 228 which represented a decrease of 78 bed-nights (= 25.4%) compared to the previous fiscal year. For the same period, the median LOT was 91 bed-nights - a decrease of 56 (= 38%) from the previous period. Length of time homeless will be one of the data elements that will be included in the CES assessment tool that will be used to evaluate risk factors, vulnerabilities, and severity of service needs. In conjunction with the CES process, the CoC is currently drafting written standards which will include specific guidance for

prioritizing individuals and families for housing based on the longest length-of-time homeless. The CES sub-committee is spearheading strategic planning relative to the reduction of the length of time homelessness persists.

**3A-3. Performance Measures: Successful Permanent Housing Placement and Retention**

**Describe: (1) the numerical change the CoC experienced; (2) the CoCs strategy to increase the rate of which individuals and families move to permanent housing destination or retain permanent housing; and (3) the organization or position responsible for overseeing the CoC’s strategy for retention of, or placement in permanent housing.**

**(limit 1000 characters)**

The number of exits to permanent housing destinations among those persons who exited ES, TH, and PH-RRH to permanent housing destinations in 2017 was 69 (=50%). Although this was an increase of 10 persons when compared with FY 2015, the change was less than 1%. With respect to permanent housing projects (except PH-RRH), the number of retentions or exits to permanent housing was 92 (= 90% of the universe of persons in all PH projects except PH-RRH). Although this was an increase of 36 persons over FY 2015, this was a decrease of 6%. Strategies employed to increase the rate at which individuals and families move to permanent housing destinations include referrals to the local PHA for public housing as well as the Housing Choice Voucher program and the HUD VASH program, where applicable, and referrals to other subsidized housing. Given that income stability is critical to successful retention of permanent housing, CoC organizations refer clients for job training & placement programs.

**3A-4. Performance Measure: Returns to Homelessness.**

**Describe: (1) the numerical change the CoC experienced, (2) what strategies the CoC implemented to identify individuals and families who return to homelessness, (3) the strategies the CoC will use to reduce additional returns to homelessness, and (4) the organization or position responsible for overseeing the CoC’s efforts to reduce the rate of individuals and families’ returns to homelessness.**

**(limit 1000 characters)**

The number of returns to homelessness in 2017 among those persons who exited ES, TH, and PH to permanent housing destinations two years prior was 4. This was a decrease of 12 clients when compared with FY 2015 - a decrease of 75%. Recognizing that income stability is a critical factor toward successfully retaining permanent housing, CoC member agencies routinely refer clients for mainstream benefits such as TANF, VA, and Social Security benefits, as appropriate. CoC agencies also refer clients to the local Department of Labor for assistance with job search skills, job training, and registration for employment. The primary strategy that will be employed to reduce returns to homelessness is ongoing case management of those clients who are deemed vulnerable.

**3A-5. Performance Measures: Job and Income Growth**

**Describe: (1) the strategies that have been implemented to increase**

**access to employment and mainstream benefits; (2) how the CoC program-funded projects have been assisted to implement the strategies; (3) how the CoC is working with mainstream employment organizations to help individuals and families increase their cash income; and (4) the organization or position that is responsible for overseeing the CoC's strategy to increase job and income growth from employment, non-employment including mainstream benefits.  
(limit 1000 characters)**

Recognizing that income stability is a critical factor toward successfully retaining permanent housing, CoC member agencies routinely refer clients (and accompany clients to appointments, if necessary) for mainstream benefits such as TANF, VA, and Social Security benefits, as appropriate. CoC agencies also refer clients to the local Department of Labor for assistance with job search skills, job training, and registration for employment. Where the client is a veteran, there is also a referral to the SSVF program which provides ongoing case management to include follow-up on referrals with particular attention to veteran-specific programs such as Hero to Hired. Clients in DHS' PHS program are also referred to the Vocational Rehabilitation Program for assessment of strengths, employment skills, and a determination of training needs. The development of strategies re: job and income growth is a collaborative effort of the entire CoC membership.

**3A-6. Did the CoC completely exclude a geographic area from the most recent PIT count (i.e. no one counted there, and for communities using samples in the area that was excluded from both the sample and extrapolation) where the CoC determined there were no unsheltered homeless people, including areas that are uninhabitable (deserts, forests).** Yes

**3A.6a. If the response to 3A-6 was "Yes", what was the criteria and decision-making process the CoC used to identify and exclude specific geographic areas from the CoCs unsheltered PIT count?  
(limit 1000 characters)**

Certain specific geographic areas were excluded from the CoC's 2017 unsheltered PIT count based on local knowledge of areas known to have concentrations of homeless persons.

**3A-7. Enter the date the CoC submitted the System Performance Measures data in HDX, which included the data quality section for FY 2016.  
(mm/dd/yyyy)** 06/05/2017

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

### Instructions

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**3B-1. Compare the total number of PSH beds, CoC program and non CoC-program funded, that were identified as dedicated for use by chronically homeless persons in the 2017 HIC, as compared to those identified in the 2016 HIC.**

	2016	2017	Difference
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homelessness persons identified on the HIC.	8	12	4

**3B-1.1. In the box below: (1) "total number of Dedicated PLUS Beds" provide the total number of beds in the Project Allocation(s) that are designated ad Dedicated PLUS beds; and (2) in the box below "total number of beds dedicated to the chronically homeless:, provide the total number of beds in the Project Application(s) that are designated for the chronically homeless. This does not include those that were identified in (1) above as Dedicated PLUS Beds.**

Total number of beds dedicated as Dedicated Plus	0
Total number of beds dedicated to individuals and families experiencing chronic homelessness	7
<b>Total</b>	<b>7</b>

**3B-1.2. Did the CoC adopt the Orders of Priority into their 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.** No

**3B-2.1. Using the following chart, check each box to indicate the factor(s) the CoC currently uses to prioritize households with children based on need during the FY 2017 Fiscal Year.**

History of or Vulnerability to Victimization	<input checked="" type="checkbox"/>
Number of previous homeless episodes	<input type="checkbox"/>

Unsheltered homelessness	<input checked="" type="checkbox"/>
Criminal History	<input type="checkbox"/>
Bad credit or rental history (including not having been a leaseholder)	<input type="checkbox"/>
Head of Household with Mental/Physical Disability	<input type="checkbox"/>

**3B-2.2. Describe: (1) the CoCs current strategy and timeframe for rapidly rehousing every household of families with children within 30 days of becoming homeless; and (2) the organization or position responsible for overseeing the CoC’s strategy to rapidly rehouse families with children within 30 days of becoming homeless. (limit 1000 characters)**

At present, the informal strategy for rapidly rehousing households of families with children consists of referral for rapid re-housing under the ESG Program. Two (2) COC member agencies in the St. Thomas- St. John district and one (1) in the St. Croix administered RRH programs as subrecipients under the ESG Program. A formal strategy to include timeframes for rapidly rehousing families with children will be incorporated in the CES Protocol which is currently being developed. The written standards will also be updated accordingly. It is anticipated that the Collaborative Applicant (VIHFA also serves as the ESG grantee for the Territory) will be tasked with the responsibility of overseeing the CoC’s strategy to rapidly rehouse families.

**3B-2.3. Compare the number of RRH units available to serve families from the 2016 and 2017 HIC.**

	2016	2017	Difference
Number of CoC Program and non-CoC Program funded PSH units dedicated for use by chronically homelessness persons identified on the HIC.	0	0	0

**3B-2.4. Describe the actions the CoC is taking to ensure emergency shelters, transitional housing, and permanent supportive housing (PSH and RRH) providers within the CoC adhere to anti-discrimination 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. (limit 1000 characters)**

CoC Written Standards require all CoC and ESG service providers have written non-discrimination policies. Non-discrimination is addressed in the current written standards and will be further clarified in the CES Protocol which is currently being developed to ensure that providers will practice a person-centered model offering participant choice to include not denying admission to or separating applicant households based on age, sex, LGBTQI status, (perceived) gender identity disability, or marital status.

**3B-2.5. From the list below, select each of the following the CoC has strategies to address the unique needs of unaccompanied homeless youth.**

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

**3B-2.6. From the list below, select each of the following the CoC has a strategy for prioritization of unaccompanied youth based on need.**

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

**3B-2.7. Describe: (1) the strategies used by the CoC, including securing additional funding to increase the availability of housing and services for youth experiencing homelessness, especially those experiencing unsheltered homelessness; (2) provide evidence the strategies that have been implemented are effective at ending youth homelessness; (3) the measure(s) the CoC is using to calculate the effectiveness of the strategies; and (4) why the CoC believes the measure(s) used is an appropriate way to determine the effectiveness of the CoC’s efforts. (limit 1500 characters)**

No homeless youth have been identified in recent PIT counts in the Territory; as such, the CoC has not established strategies for prioritization of unaccompanied youth based on need or for securing additional funding for housing and services for this population to date. Further, without strategies in place to address youth homeless for the reason outlined above, the CoC has not developed any performance measures to determine effectiveness.

**3B-2.8. Describe: (1) How the CoC collaborates with youth education providers, including McKinney-Vento local educational authorities and school districts; (2) the formal partnerships the CoC has with these entities; and (3) the policies and procedures, if any, that have been adopted to inform individuals and families who become homeless of their eligibility for educational services. (limit 1000 characters)**

The CoC does not currently collaborate with education providers relative to

referrals of the provision of services for homeless individuals or families.

**3B-2.9. Does the CoC have any written formal agreements, MOU/MOAs or partnerships with one or more providers of early childhood services and supports? Select “Yes” or “No”.**

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

**3B-3.1. Provide the actions the CoC has taken to identify, assess, and refer homeless Veterans who are eligible for Veterans Affairs services and housing to appropriate resources such as HUD-VASH and Supportive Services for Veterans Families (SSVF) program and Grant and Per Diem (GPD). (limit 1000 characters)**

Methodist Training & Outreach, Center, Inc, (MTOC), a CoC member organization, is the local grantee for the SSVF Program; as such, all CoC member organizations are aware of the existence of this program as a resource to assist homeless veterans. Once a CoC agency identifies an applicant/client as a veteran in need of housing stabilization assistance, referrals are made to the SSVF Program. SSVF's intake process includes verification of income and veteran status and conduct of a needs assessment. Where it is determined that the client is literally homeless, the SSVF case manager arranges for immediate emergency housing placement while working to identify permanent placement options for the client through either public housing, private landlords, or the HUD-VASH program. SSVF also provides ongoing case management to include referrals for mainstream services (e.g., subsistence programs,SNAP, DOL's Hero to Hired Program) and other wraparound services as needed.

**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** Yes

**benchmarks and criteria for ending Veteran homelessness?**

**3B-3.4. Does the CoC have sufficient resources to ensure each Veteran is assisted to quickly move into permanent housing using a Housing First approach?** No

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

**Instructions:**

For guidance on completing this application, please reference the FY 2017 CoC Application Detailed Instructions and the FY 2017 CoC Program Competition NOFA. Please submit technical questions to the HUD Exchange Ask A Question.

**4A-1. Select from the drop-down (1) each type of healthcare organization the CoC assists program participants with enrolling in health insurance, and (2) if the CoC provides assistance with the effective utilization of Medicaid and other benefits.**

Type of Health Care	Yes/No	Assist with Utilization of Benefits?
Public Health Care Benefits (State or Federal benefits, e.g. Medicaid, Indian Health Services)	Yes	Yes
Private Insurers:	No	No
Non-Profit, Philanthropic:	No	No
Other: (limit 50 characters)		
Federally Qualified Health Center	Yes	Yes

**4A-1a. Mainstream Benefits**

**CoC program funded projects must be able to demonstrate they supplement CoC Program funds from other public and private resources, including: (1) how the CoC works with mainstream programs that assist homeless program participants in applying for and receiving mainstream benefits; (2) how the CoC systematically keeps program staff up-to-date regarding mainstream resources available for homeless program participants (e.g. Food Stamps, SSI, TANF, substance abuse programs); and (3) identify the organization or position that is responsible for overseeing the CoCs strategy for mainstream benefits. (limit 1000 characters)**

CoC member organizations work closely with mainstream programs by referring clients and assisting them with the process of applying for and receiving mainstream benefits such as SNAPs, TANF, Medicaid. Through the case management services provided by Department of Human Services staff, clients of its CoC-funded Permanent Supportive Housing Program also receive assistance in applying for other services - including, but not limited to, DHS' Vocational Rehabilitation Program, senior citizen identification cards, and discounted transportation services, as appropriate. Other CoC member organizations such as The Village- VI Partners in Recovery, and Frederiksted Health Care, Inc. routinely collaborate with other ESG recipients and community partner agencies regarding new and existing program participants. This entails ensuring continuity of care between agencies, ongoing client-specific

collaboration and referrals between service providers.

**4A-2. Low Barrier: Based on the CoCs FY 2017 new and renewal project applications, what percentage of Permanent Housing (PSH) and Rapid Rehousing (RRH), Transitional Housing (TH), Safe-Haven, and SSO (Supportive Services Only-non-coordinated entry) projects in the CoC are low-barrier?**

Total number of PH (PSH and RRH), TH, Safe-Haven and non-Coordinated Entry SSO project applications in the FY 2017 competition (new and renewal)	2.00
Total number of PH (PSH and RRH), TH, Safe-Haven and non-Coordinated Entry SSO renewal and new project applications that selected "low barrier" in the FY 2017 competition.	2.00
Percentage of PH (PSH and RRH), TH, Safe-Haven and non-Coordinated Entry SSO renewal and new project applications in the FY 2017 competition that will be designated as "low barrier"	100.00%

**4A-3. Housing First: What percentage of CoC Program Funded PSH, RRH, SSO (non-coordinated entry), safe-haven and Transitional Housing; FY 2017 projects have adopted the Housing First approach, meaning that the project quickly houses clients without preconditions or service participation requirements?**

Total number of PSH, RRH, non-Coordinated Entry SSO, Safe Haven and TH project applications in the FY 2017 competition (new and renewal).	2.00
Total number of PSH, RRH, non-Coordinated Entry SSO, Safe Haven and TH renewal and new project applications that selected Housing First in the FY 2017 competition.	2.00
Percentage of PSH, RRH, non-Coordinated Entry SSO, Safe Haven and TH renewal and new project applications in the FY 2017 competition that will be designated as Housing First.	100.00%

**4A-4. Street Outreach: Describe (1) the CoC's outreach and if it covers 100 percent of the CoC's geographic area; (2) how often street outreach is conducted; and (3) how the CoC has tailored its street outreach to those that are least likely to request assistance. (limit 1000 characters)**

Various CoC member organizations on all three islands conduct street outreach on a weekly basis. Tactics use include "word of mouth" using "gatekeepers" (i.e., individuals already enrolled in the program), distribution of flyers, "on the ground" surveillance, and rapport-building at locations known to be highly trafficked by the chronically homeless. Frederiksted Health Care uses a mobile van to for outreach in the more rural areas with site visits to bus shanties, waste-management installations, abandoned buildings, and other sites where the homeless congregate. FHC also uses incentives to build rapport - distributing hygiene items, medical supplies?syringes, condoms, clothing, bus passes, and food. Similar incentive efforts are employed by St. John Community Foundation.

**4A-5. Affirmative Outreach  
Specific strategies the CoC has 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; who are least likely to apply in the absence of special outreach. Describe: (1) the specific strategies that have been implemented that affirmatively further fair housing as detailed in 24 CFR 578.93(c); and (2) what measures have been taken to provide effective communication to persons with disabilities and those with limited English proficiency. (limit 1000 characters)**

CoC Written Standards require all CoC and ESG service providers have written non-discrimination policies. Affirmative outreach is addressed in the CES Protocol. Providers will practice a person-centered model offering participant choice and inclusion of all homeless subpopulations (i.e., individuals, families with children, youth, veterans, seniors, DV victims, and LGBTQI individuals and families). Subrecipients must ensure that all people, including those least likely to access assistance, have fair and equal access to the coordinated entry process and all forms of assistance regardless of race, ethnicity, national origin, age, sex, familial status, religion, disability, (perceived) gender identity, marital status, or (perceived) sexual orientation. Agencies shall provide appropriate, reasonable accommodations for persons with speech, hearing or vision impairments and/or Limited English Proficiency including qualified interpreters, and other ways of making communications accessible.

**4A-6. Compare the number of RRH beds available to serve populations from the 2016 and 2017 HIC.**

	2016	2017	Difference
RRH beds available to serve all populations in the HIC	7	29	22

**4A-7. Are new proposed project applications requesting \$200,000 or more in funding for housing rehabilitation or new construction?** No

**4A-8. Is the CoC requesting to designate one or more SSO or TH projects to serve homeless households with children and youth defined as homeless under other Federal statutes who are unstably housed (paragraph 3 of the definition of homeless found at 24 CFR 578.3).** No

## 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
01. 2016 CoC Consolidated Application: Evidence of the CoC's communication to rejected participants	Yes	Rejected Applica...	02/27/2018
02. 2016 CoC Consolidated Application: Public Posting Evidence	Yes	CoC Application P...	02/28/2018
03. CoC Rating and Review Procedure (e.g. RFP)	Yes	VICoC Rating and ...	02/28/2018
04. CoC's Rating and Review Procedure: Public Posting Evidence	Yes	Public Posting No...	02/28/2018
05. CoCs Process for Reallocating	Yes	Explanation re: R...	02/27/2018
06. CoC's Governance Charter	Yes	CoC By-laws	02/27/2018
07. HMIS Policy and Procedures Manual	Yes	HMIS Policy and P...	02/27/2018
08. Applicable Sections of Con Plan to Serving Persons Defined as Homeless Under Other Fed Statutes	No		
09. PHA Administration Plan (Applicable Section(s) Only)	Yes	PHA Preference List	02/27/2018
10. CoC-HMIS MOU (if referenced in the CoC's Governance Charter)	No		
11. CoC Written Standards for Order of Priority	No		
12. Project List to Serve Persons Defined as Homeless under Other Federal Statutes (if applicable)	No		
13. HDX-system Performance Measures	Yes	System Performanc...	02/27/2018
14. Other	No	Grant Application...	02/28/2018
15. Other	No		

## **Attachment Details**

**Document Description:** Rejected Applicant Information

## **Attachment Details**

**Document Description:** CoC Application Public Notice

## **Attachment Details**

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

## **Attachment Details**

**Document Description:** Public Posting Notice CoC Rating and Review

## **Attachment Details**

**Document Description:** Explanation re: Reallocation

## **Attachment Details**

**Document Description:** CoC By-laws

## **Attachment Details**

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

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:** PHA Preference List

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:**

## **Attachment Details**

**Document Description:** System Performance Measures

## **Attachment Details**

**Document Description:** Grant Application Notification Letters

## **Attachment Details**

**Document Description:**

## Submission Summary

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

<b>Page</b>	<b>Last Updated</b>
<b>1A. Identification</b>	02/16/2018
<b>1B. Engagement</b>	02/26/2018
<b>1C. Coordination</b>	02/27/2018
<b>1D. Discharge Planning</b>	02/16/2018
<b>1E. Project Review</b>	02/27/2018
<b>1F. Reallocation Supporting Documentation</b>	No Input Required
<b>2A. HMIS Implementation</b>	02/27/2018
<b>2B. PIT Count</b>	02/16/2018
<b>2C. Sheltered Data - Methods</b>	02/22/2018
<b>3A. System Performance</b>	02/27/2018
<b>3B. Performance and Strategic Planning</b>	02/26/2018

<b>4A. Mainstream Benefits and Additional Policies</b>	02/23/2018
<b>4B. Attachments</b>	02/28/2018
<b>Submission Summary</b>	No Input Required



# V.I. CONTINUUM OF CARE



V.I. Housing Finance Authority, Collaborative Applicant

February 1, 2018

Mrs. Andrea Shillingford  
Executive Director  
Catholic Charities of the Virgin Islands, Inc. (CCVI)  
P.O. Box 10736  
St. Thomas, VI 00801

Dear Mrs. Shillingford:

The Virgin Islands Housing Finance Authority, in its role as the Collaborative Applicant, for the Virgin Islands Continuum of Care (VI CoC) acknowledges receipt of your organization's submission of an application for funding under the Permanent Supportive Housing bonus component of the FY 2017 CoC Grant.

As you may be aware, the CoC is required to conduct a formal review of the project applications submitted for compliance with eligibility requirements and rating factors; projects are then either accepted (i.e., approved) and ranked or rejected. In this process, the CoC appointed an evaluation team comprised of the Collaborative Applicant and two other representatives of CoC participating organizations.

Unfortunately, upon review by the evaluation team, your organization's application was deemed substantially incomplete. As such, regrettably the application was not ranked and will not be included among the projects submitted under the CoC Consolidated Application.

We applaud CCVI's effort to apply for funding under the CoC Grant to provide additional housing opportunities for chronically homeless individuals on St. Croix. We trust that the organization will apply again in the FY 2018 funding cycle. In the meantime, we acknowledge the tireless efforts of CCVI's staff in providing services to the homeless and less fortunate in our community and we extend our best wishes for success in your future endeavours.

Should you have any questions about the application review process and/or the factors which led to the rejection of your organization's application, please feel free to contact me at (340) 772-4432 or via e-mail at [jhector@vihfa.gov](mailto:jhector@vihfa.gov).

Sincerely,

  
Janine Hector  
Federal Programs Director, VIHFA

xc: Evaluation Team  
CoC File

**jhector**

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**From:** jhector  
**Sent:** Tuesday, February 13, 2018 3:44 PM  
**To:** Andrea Shillingford (ccusvi@outlook.com)  
**Subject:** FW: CCVI Notification Letter  
**Attachments:** CCVI Notification Letter.pdf

Good day, Mrs. Shillingford:

Please see attached correspondence regarding the status of your organization's application for funding under the FY 2017 CoC Grant.

Sincerely,

Janine Hector  
Federal Programs Director  
100 Lagoon Complex, Suite 4  
St. Croix, VI 00840  
Tel. (340) 772-4432  
Fax. (340) 772-4002  
Email: jhector@vihfa.gov

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company. Finally, the recipient should check this email and any attachments for the presence of viruses. The company accepts no liability for any damage caused by any virus transmitted by this email.

-----Original Message-----

**From:** xeroxscanner\_stx@vihfa.gov [mailto:xeroxscanner\_stx@vihfa.gov]  
**Sent:** Tuesday, February 13, 2018 3:09 PM  
**To:** jhector <jhector@vihfa.gov>  
**Subject:** CCVI Notification Letter

Please open the attached document. It was scanned and sent to you using a Xerox Multifunction Printer.

Attachment File Type: pdf, Multi-Page

Multifunction Printer Location:  
Device Name: XeroxWorkCentre7855

For more information on Xerox products and solutions, please visit <http://www.xerox.com>

jhector

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**From:** Microsoft Outlook  
**To:** Andrea Shillingford (ccusvi@outlook.com)  
**Sent:** Tuesday, February 13, 2018 3:44 PM  
**Subject:** Relayed: FW: CCVI Notification Letter

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Andrea Shillingford \(ccusvi@outlook.com\)](mailto:ccusvi@outlook.com) ([ccusvi@outlook.com](mailto:ccusvi@outlook.com))

Subject: FW: CCVI Notification Letter

# **Y.I. CONTINUUM OF CARE**



V.I. Housing Finance Authority, Collaborative Applicant

FEBRUARY 26, 2018

## **PUBLIC NOTICE 2017 HUD CONTINUUM OF CARE GRANT APPLICATION (Funding Opportunity Number: FR-6100-N-25)**

**This notice is posted pursuant to the Notice of Funding Availability (NOFA) for the Fiscal Year (FY 2017) Continuum of Care Grant Program Competition.**

**Each year, the U.S. Department of Housing and Urban Development (HUD) issues funding opportunities under the Continuum of Care Grant Program. The Continuum of Care Grant Program is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by non-profit providers, state, and local governments to quickly re-house homeless individuals, families, persons fleeing domestic violence, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effect utilization of mainstream programs by homeless individuals and families; and to optimize self-sufficiency among those experiencing homelessness.**

**The local Continuum of Care (VI- CoC) is required by HUD to submit a consolidated application for funding for renewal and/or new homeless services projects seeking funding under the CoC Grant. This posting provides notice of the FY 2017 Consolidated Application and the listing of the project applications that are included thereunder.**

### **Renewal Projects**

- **Department of Human Services (DHS) PHB Renewal Project**  
**Location: (scattered site) St. Thomas, U.S. Virgin Islands**
- **VI-HMIS Homeless Management Information System**  
**Location: (territory-wide) Territory of the U.S. Virgin Islands**

### **New projects**

- **The Village – VI Partners in Recovery Housing Support Program**  
**Location: St. Croix, U.S. Virgin Islands**
- **CoC Planning Project Application**  
**Location: (territory-wide) Territory of the U.S. Virgin Islands**

# V.I. CONTINUUM OF CARE



V.I. Housing Finance Authority, Collaborative Applicant

## **2017 HUD CONTINUUM OF CARE GRANT APPLICATION (Funding Opportunity Number: FR-6100-N-25) RATING AND REVIEW PROCEDURE**

Each year, the U.S. Department of Housing and Urban Development (HUD) issues funding opportunities under the Continuum of Care Grant Program. The Continuum of Care Grant Program is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by non-profit providers, state, and local governments to quickly re-house homeless individuals, families, persons fleeing domestic violence, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effect utilization of mainstream programs by homeless individuals and families; and to optimize self-sufficiency among those experiencing homelessness.

The local Continuum of Care (VI- CoC) is required by HUD to solicit renewal and/or new homeless services projects to be included under a consolidated application for funding under the CoC Grant. The VICoC made information about the funding opportunity available via announcements at the monthly CoC meetings and also via e-mail.

Pursuant to the Notice of Funding Availability (NOFA) for the Fiscal Year (FY 2017) Continuum of Care Grant Program Competition, HUD expects the CoC to implement a thorough review of all new and renewal applications submitted for consideration to ensure the project's eligibility and satisfaction of published project quality threshold requirements as applicable for the project type. In addition, HUD also requires the CoC to score and then either approve and rank or reject each application.

The VICoC's project review and rating procedure consists of designation of an Evaluation Committee composed of at least three representatives of CoC member organizations. To avoid conflict of interest, only representatives of agencies which have not submitted an application the current cycle are eligible to serve on the Evaluation Committee.

The evaluation team will utilize a project ratings tool sourced from the HUDexchange website. The rating factors considered include applicant experience, design of housing and support services, timeliness of proposed implementation, financial capacity, and project effectiveness. Within these factors, the project evaluators will review specific criteria such as applicant's utilization of a Housing First approach, program's effectiveness in assisting program participants to achieve and maintain independent living and housing stability, performance against plans and goals established in initial application [renewal projects only], and grant management

performance. (Note: HMIS projects are not evaluated for factors relating to client assistance).

The CoC reserves the right to return applications for correction of minor issues identified during the review process. The CoC also reserves the right to reject project applications for the following reasons:

1. Audit findings(s) for which a response is overdue or unsatisfactory
2. Inadequate financial management capacity or accounting systems
3. Unsatisfactory grant performance as evidenced by untimely expenditure of prior year grant funds
4. History of capacity issues that have negatively impacted project operation and performance.

All applications will be notified in writing within 15 days of the application deadline of the disposition of their application relative to whether the application will be accepted and ranked on the CoC Priority Listing, rejected, or reduced. Where a project application is being rejected or reduced, the CoC will provide a reason for the action.

**PUBLIC NOTICE**  
**2017 HUD CONTINUUM OF CARE GRANT APPLICATION**  
**(Funding Opportunity Number: FR-6100-N-25)**  
**PROJECT APPLICATION RATING AND REVIEW PROCEDURE**

This notice is posted pursuant to the Notice of Funding Availability (NOFA) for the Fiscal Year (FY 2017) Continuum of Care Grant Program Competition.

Each year, the U.S. Department of Housing and Urban Development (HUD) issues funding opportunities under the Continuum of Care Grant (CoC) Program. The CoC Grant Program is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by non-profit providers, state, and local governments to quickly re-house homeless individuals, families, persons fleeing domestic violence, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effect utilization of mainstream programs by homeless individuals and families; and to optimize self-sufficiency among those experiencing homelessness.

The local Continuum of Care (VI- CoC) is required by HUD to solicit renewal and/or new homeless services projects to be included under a consolidated application for funding under the CoC Grant. HUD expects the CoC to implement a thorough review of all new and renewal applications submitted for consideration to ensure the project's eligibility and satisfaction of published project quality threshold requirements. In addition, HUD also requires the CoC to score and then either approve and rank or reject each application.

The VCoC's project review and rating procedure consists of designation of an Evaluation Committee composed of at least three representatives of CoC member organizations. To avoid conflict of interest, only representatives of agencies which have not submitted an application the current cycle are eligible to serve on the Evaluation Committee.

The evaluation team will utilize a project ratings tool sourced from the hudexchange website. The rating factors considered include applicant experience, design of housing and support services, timeliness of proposed implementation, financial capacity, and project effectiveness. Within these factors, the project evaluators will review specific criteria such as applicant's utilization of a Housing First approach, program's effectiveness in assisting program participants to achieve and maintain independent living and housing stability, performance against plans and goals established in initial application [renewal projects only], and grant management performance. (Note: HMIS projects are not evaluated for factors relating to client assistance).

The CoC reserves the right to return applications for correction of minor issues identified during the review process. The CoC also reserves the right to reject project applications for the following reasons:

1. Audit findings(s) for which a response is overdue or unsatisfactory
2. Inadequate financial management capacity or accounting systems
3. Unsatisfactory grant performance as evidenced by untimely expenditure of prior year grant funds
4. History of capacity issues that have negatively impacted project operation and performance.

All applications will be notified in writing within 15 days of the application deadline of the disposition of their application relative to whether the application will be accepted and ranked, rejected, or reduced. Where a project application is being rejected or reduced, the CoC will provide a reason for the action.

The following project applications have been reviewed, accepted and ranked and thus included under the FY 2017 Continuum of Care (CoC) Consolidated Grant Application.

#### Renewal Projects

- **Department of Human Services (DHS) PHB Renewal Project**  
**Location: (scattered site) St. Thomas, U.S. Virgin Islands**
- **VI-HMIS Homeless Management Information System**  
**Location: (territory-wide) Territory of the U.S. Virgin Islands**

#### New projects

- **The Village – VI Partners in Recovery Housing Support Program**  
**Location: St. Croix, U.S. Virgin Islands**
- **CoC Planning Project Application**  
**Location: (territory-wide) Territory of the U.S. Virgin Islands**

February 26, 2018



**AMENDED AND RESTATED  
BYLAWS  
VIRGIN ISLANDS CONTINUUM OF CARE  
ON  
HOMELESSNESS  
(Approved January 24, 2014)**

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## **Article 1: Name, Vision, Mission, and Goals**

### **1.01 Name**

The name of this organization shall be the Virgin Islands Continuum of Care on Homelessness (“Continuum” or “COC”).

### **1.02 Vision**

The vision of the Continuum is to end homelessness in the United States Virgin Islands.

### **1.03 Mission**

The mission of the Continuum is to serve as a cooperative of organizations, associations and agencies (collectively “organizations”) and individuals dedicated to the Continuum; to increase the effectiveness and build the capacity of such organizations so each can reach their full potential and access the maximum possible resources.

### **1.04 Goals**

- A) Network and collaborate
  - Technical assistance
  - Homeless Management Information Systems (HMIS)
  - Sharing information
  - Planning and development
  - Coordination with Virgin Islands Interagency Council on Homelessness
  - Coordination with public and private groups
  
- B) Advocate and Educate
  - Educate legislators, territorial officials, housing developers, service providers, community leaders, other concerned groups, and the general public
  - Educate to include ways to incorporate the homeless population in the process
  
- C) Build capacity
  - Help secure funding
  - Build an infrastructure

## **Article 2: Membership**

### **2.01 Open and Inclusive Membership**

Membership in the Continuum is open to all interested community members and organizations, both public and private. All governmental agencies with an interest in the Mission of the Continuum may be included as members of the Continuum.

### **2.02 Consumer Member Outreach**

Continuum members shall regularly invite persons who are or have experienced homelessness to join the Continuum. In the interest of protecting privacy, current or formerly homeless person shall at no time be asked or required to disclose their past or present housing status to the Continuum or its membership.

### **2.03 Good Standing**

To be a member in good standing of the Continuum, persons or representative from an organization or agency shall have attended three (3) of the last four (4) quarterly meetings of the Continuum. Once a member has attended two (2) scheduled Continuum membership meetings they shall be granted voting privileges. A person, organization or agency must maintain a forty percent (40%) annual attendance of all scheduled Continuum meetings to retain voting privileges. Prior to removing a member from good standing with the Continuum, they shall be notified of their attendance status.

### **2.04 Organization/Agency Member Representatives**

Each organization or agency member shall have one (1) representative member. The representative member shall speak and vote on behalf of the organization or agency at meetings of the Continuum. Representatives must belong to the organization or agency which they represent. It is preferable that an organization or agency program manager or chief executive officer attend Continuum meetings to

facilitate the entity making expeditious decisions and operate more effectively. An organization or agency need not send the same person to all Continuum meetings.

**2.05 Voting; Quorum**

Each member organization or agency representative shall have one (1) vote at Continuum membership meetings. A majority of the voting members present shall constitute a quorum; provided that there shall be at least one member from each island district. The Continuum shall attempt to reach consensus whenever possible. Only one person for each organization or agency may cast a vote. A person may not cast a vote on behalf of two (2) or more organizations during the same vote.

**2.06 Proposal Submissions**

Failure to attend Continuum meetings shall not negate an organization or agency's right to submit a proposal for Continuum consideration. All organizations submitting for potential funding shall adhere to all respective applications' guidelines and deadlines for the application to be accepted and referred to the Review Committee for consideration for recommendation for potential funding.

**2.07 Meetings; Notice**

A) The Continuum members shall meet at least four (4) times a year at a time and place designated by the Board. Meeting notification shall be sent to members not less than ten (10) days prior to the meeting.

B) The Annual Meeting of the Continuum shall take place in the last three months of the calendar year at a dated, time and location determined by the Board.

C) Minutes shall be taken of each meeting of the Continuum and the Board, including attendance and a record of votes on all motions. Minutes shall be published on the Continuum's web site.

D) Meetings of the Continuum, the Board or its Committees will be held by teleconference or videoconference at any place within the Territory.

E) The rules contained in the current edition of *Robert's Rules of Order Newly Revised* shall govern the Continuum in all cases to which they are applicable and in which they are not inconsistent with these Bylaws and any special rules of order the Continuum may adopt.

F) On matters under discussion by the Continuum, the Board or its Committees shall seek to hear all points of view and obtain consensus.

G) In accordance with the Continuum goal of sharing information, meetings shall be open to all interested parties and the agenda shall be publicly noticed. The length of time allocated to non-representatives for speaking in the meetings may be limited by the presiding officer, subject to an override by the majority of representatives present.

**2.08 Election of Board**

Board members shall be elected by majority vote at the Annual Meeting of the Continuum from nominations provided in accordance with Section 6.02(F) hereof and shall serve from January 1 through December 31 of the following calendar year.

**2.09 Prioritization of Projects**

The members of the Continuum shall prioritize projects submitted by organizations applying for U.S. Housing and Urban Development funding whether an original application or a renewal thereof. The Board shall appoint a facilitator to assist with the prioritization of projects. On the day of prioritization the facilitator shall review the guidelines for prioritization and the scoring criteria and tabulation form for scoring which shall identify all proposals that have requested funding. The facilitator shall provide information to Continuum member on the funding requests and the types of proposals submitted. Each organization or agency with a project approved by the Review Committee shall be allotted ten (10) minutes to summarize the project and address how it meets community needs and address questions from the Continuum members. The facilitator shall serve as timekeeper and enforce guidelines for presentations. After presentations are complete, the projects shall be scored on

the scoring sheet based on the prioritization guidelines. Representatives of the VI Housing Finance Authority and coordinating agency shall not participate in the voting process. All members shall be allowed one (1) vote; provided that only one (1) person from each member organization or agency shall be allowed to vote. All ballots shall be tallied and final scores figured and presented to the Continuum for final discussion and determination. All decisions reached from voting and subsequent discussion shall be final. Those organizations that have projects pending renewal that have been approved by the Review Committee shall not be required to make a presentation; provided however, they provide an opportunity for Continuum members to address questions to such organizations for a period of five (5) minutes for each renewal project.

### **Article 3: Board of Directors**

#### **3.01 General Powers**

The affairs of the Virgin Islands Continuum of Care on Homelessness shall be managed by its Board of Directors (Board). The duties of the Board shall include:

- (A) Monitoring and oversight over Continuum programs, including SHP, ESG and U.S. Department of Housing and Urban Development and territorial programs recommended for funding through the Continuum;
- (B) Establishing the date, time and location for COC meetings, together with the agenda thereof;
- (C) Approval of appointments by Chair of members to COC committees and establishment of ad hoc committees of the COC;
- (D) Periodic review of these Bylaws and recommendation for amendments thereto;
- (E) Development and revision of job descriptions for HMIS Lead Agency and Collaborative Applicant;
- (F) Oversight and monitoring of COC funded projects; and
- (G) Such other responsibilities as customarily associated with corporate boards and as may be determined by the Continuum members.

All recommendations of the Board shall be ratified at a regular meeting of the Board. The Board shall be authorized to make decisions on behalf of the Continuum only when a matter is time sensitive and must be made before a Continuum meeting can be scheduled.

#### **3.02 Board Membership**

The Board of the Continuum shall consist of nine (9) members including the Chair, Vice Chair, Secretary-Treasurer and three (3) At Large members of the Board who shall each be a member of the Continuum. Not less than one (1) member of the Board shall be a current or former consumer of homeless services persons who are or have experienced homelessness. The immediate past Chair of the Continuum and the HMIS Lead Agency and Collaborative Applicant representatives shall serve as an ex officio member of the Board.

### **Article 4: Meetings of the Board of Directors**

#### **4.01 Regular Meetings**

A) Regular meetings of the Continuum Board shall be held at least six (6) times per year as scheduled by the Chair or by resolution of the Board.

B) Written notice of meetings, stating the date, time and location of the meeting, shall be transmitted to each representative as far in advance as possible and at least ten (10) days before the date appointed for the meeting. Meetings shall be announced on the Continuum's website and discussion board.

#### **4.02 Special Meetings**

A) Special meetings of the Continuum Board may be called for any purpose, at any time, by the Chair, by a majority of the Board or by nine (9) members of the Continuum acting jointly.

B) Written notice of special meetings, stating the date, time and location of the meeting, shall be transmitted to the members of the Board as far in advance as possible and at least ten (10) days before the date appointed for the meeting. The notice shall contain a tentative agenda, but the meeting shall not be confined to any agenda included with the notice. Special meetings shall also be announced on the Continuum's website and discussion board.

#### **4.03 Conduct of Meetings**

At all meetings of the Continuum Board, the Chair, Vice Chair, Immediate Past President and Secretary-Treasurer, in the order named, shall preside if present; or if none of them is present, a majority of the representatives present shall designate a member of the Board to preside.

### **Article 5: Officers**

#### **5.01 Title and Qualifications**

The officers of the Board shall be a Chair, a Vice Chair, a Secretary-Treasurer, and such other officers as may be designated by resolution in a meeting of the Board. Officers shall be organization representatives to the Board.

#### **5.02 Term of Office**

The term of office of members of the Board shall be one (1) year. The Chair may serve a maximum of three (3) complete terms. All other officers may be reelected to successive terms.

#### **5.03 Duties**

Duties of the officers shall be as follows:

A) Chair – Subject to the direction and supervision of the Board, the Chair shall have general and active control over the affairs and business of the Continuum. The Chair shall preside over Board meetings, prepare or delegate the preparation of and approve agendas, and carry out other duties as may be designated by resolution or as described in these Bylaws.

B) Vice Chair – The Vice Chair shall fulfill the duties of Chair in absence of the Chair or as delegated by the Chair.

C) Secretary-Treasurer – The Secretary- Treasurer shall communicate with organizations and Board members on behalf of the Continuum, including providing notice of meetings; maintain membership data; keep minutes of Board meetings, including attendance of members at all meetings of the Continuum and a record of votes on all motions; collect, deposit and expend funds as directed by the Board and maintain the financial records of the Continuum; and fulfill duties of Chair and Vice Chair in their absence or as delegated by the Chair.

#### **5.04 Election of Officers**

A) Officers shall be elected annually at a Board meeting scheduled during the last three months of each calendar year to serve from January 1 through December 31 of the following calendar year. The notice announcing the meeting when officers are to be elected must include an announcement that elections will take place.

B) Officers shall be elected by a plurality of the Board present at the meeting when elections are held. A quorum must be present at the meeting electing officers.

#### **5.05 Removal and Resignation**

A) If the position of Vice Chair or Secretary-Treasurer becomes vacant, the Board shall appoint a Continuum member to serve in the position for the remainder of the term of office. If the position of Chair becomes vacant, the Vice Chair shall execute the duties of Chair for the remainder of the term.

B) Any officer or Board member may be removed by two-thirds (2/3) majority vote at any duly constituted Board of Directors meeting if, in the judgment of the Board, the best interests of the Continuum would be served thereby.

### **Article 6: Committees**

#### **6.01 Designation, Membership, and Powers**

A) The Continuum shall have such committees as may from time to time be established by resolution of the Board. Committee chairs shall be designated by the Board. Any resident of the United States Virgin Islands may serve as a committee chair. Each committee shall include at least one Board representative.

B) Committees are authorized to make recommendations to the Board.

#### **6.02 Standing Committees**

A) The Development Committee shall participate in community fundraising to generate funds for the Homeless Prevention Endowment Funds which shall be established with such community foundations as determined by the Board.

B) The Homeless Management Information Systems (HMIS) Committee shall be a standing committee and oversee the operation of the HMIS. The chair of the HMIS Committee shall be designated by the Board. Each organization and agency shall have one (1) representative on the HMIS Committee who will speak and vote on behalf of their respective entity at meetings of the committee. In addition to organization and agency representatives, the HMIS Committee shall include: one (1) representative of the U.S. Virgin Islands Department of Health; one (1) representative of the Virgin Islands Housing Authority (VIHA); one (1) representative of the Virgin Islands Housing Finance Authority (VIHFA); and one (1) representative of the Virgin Islands Department of Human Services (DHS).

C) The Review Committee shall be a standing committee. The chair shall be designated by the Board and shall designate the other committee members with the advice of the Board; provided that members of the Review Committee: (i) shall not be employed by an organization or agency that intends to serve as a sponsor for a project submitted to either Supportive Housing Program (SHP) or Emergency Services Grant (ESG) funding; (ii) shall abstain from voting if they have an affiliation as a board member or volunteer with an organization or agency applying to serve as a sponsor for SHP or ESG funding and (iii) shall possess significant knowledge and experience in: (a) HUD threshold requirements, the Virgin Islands Consolidated Plan, the latest Continuum Strategic Plan, and the Virgin Islands Ten Year Plan to End Homelessness; (b) local organizations (both public and private, government and non-government), their capacity, current projects, and any local initiatives or collaborations; and (c) gaps in community services, mainstream resources and other community obstacles and barriers.

D) The Strategic Planning Committee shall assess the nature and extent of chronic homelessness in the Virgin Islands and develop a comprehensive plan to eliminate or significantly reduce homelessness, including identifying and securing funding for the Continuum. The Strategic Planning Committee shall meet at least six (6) times a year.

E. The Evaluation Committee shall be appointed through collaboration between the Continuum and the Virgin Islands Housing Finance Authority. The Committee shall be committed to the principle that evaluation is essential to ensuring that entities offering Supportive Housing Programs (SHP) and Emergency Shelter Grant (ESG) programs funded through the Continuum have demonstrated value to the persons they serve. Quality and value are determined by the Continuum Coordinator's on-site observations including review of documents such as monitoring correspondence and Annual Progress Reports; and interviews with organization and agency staff that are shared with the Evaluation Committee. The Evaluation Committee shall facilitate entity presentations to the Committee. The Evaluation Committee's goal shall be to promote equality and value in service provision by offering assistance that focuses on organizational and program or service improvement. All entities receiving funding through SHP or ESG shall be evaluated on a rotating basis, with each being evaluated at a minimum of once a year in accordance with the provisions hereof. Members of the Evaluation Committee shall not be employed by an entity receiving SHP, ESG, or Department of Human Services SFSC funding. The Evaluation Committee shall meet not less than bi-monthly and shall provide a report to the Continuum regarding those entities evaluated.

F) The Chair shall appoint a Nominating Committee to nominate six (6) persons to the Board; provided that there shall be at least two (2) nominations from St. Croix and two (2) nominations from St. Thomas and one (1) nomination from St. John. Nominations made by the Nominating Committee must be announced along with the notice of the Annual Meeting of the Continuum when the election is to take place. Nominations may be made from the floor of the Annual Meeting of the Continuum where the election will be held. The Nominating Committee shall review and make recommendations on the Board selection process not less than every five (5) years.

**6.03 Ad Hoc Committees**

Ad hoc committees may be established from time to time by the Board. Committee chairs and members shall be designated by the Chair and approved by the Board. Any resident of the United States Virgin Islands may be a member of an ad hoc committee. Each committee must include at least one (1) Continuum Board member.

**6.04 Meetings and Action of Committees**

All committees shall take meeting minutes and attendance. Meetings and action of committees shall be conducted in accordance with the provisions of these Bylaws concerning Board meetings, with such changes in the context of such Bylaw provisions as are necessary to substitute the committee and its members for the Board of Directors and its representatives, except that the time for regular and special meetings of committees may be fixed by resolution of the Board or by the committee. Each committee member will have one (1) vote at meetings of the committee. Actions taken by the committees shall be recommendations to the Board.

**Article 7: General Provisions**

**7.01 Fiscal Year**

The fiscal year of the Continuum shall be from October 1<sup>st</sup> to September 30<sup>th</sup> of the succeeding year or as otherwise determined by the Board.

**7.02 Conflict of Interest**

No member shall vote on a matter on which their organization has a vested interest. In the event that a matter which raises a potential conflict of interest comes before the Board or its Committees for consideration, recommendation, or determination, the Member shall disclose the conflict of interest as soon as they are aware of it and the disclosure shall be recorded in the minutes of the meeting.

**7.03 Review and Amendment to Bylaws**

These Bylaws shall be reviewed in January every other year or more frequently, if required. The Bylaws may be amended, or repealed by a two-thirds (2/3) majority vote at a regular or special meeting of the members of the Continuum.

# **Virgin Islands Continuum of Care**



## **US Virgin Islands Homeless Management Information System Policies and Standard Operating Procedures Version 1.3**

**Effective Date  
August 1<sup>st</sup>, 2008  
Revised : 3/30/2017**

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**Attachments**

- Attachment A: User License Agreement
- Attachment B: Description of Universal and Program Data Elements
- Attachment C: HUD's HMIS Data Standards
- Attachment D: COC Privacy Policy
- Attachment E: HMIS Authorized Agency Agreement

## Summary of Policies and Procedures For Users

<b>Policy</b>	<b>Procedure</b>	<b>Section Reference for Description</b>
<p><b>User Licenses:</b> All users must sign a license agreement before accessing the VI HMIS.</p>	<p>The System Administrator must give each user a copy of the VI Standard Operating Procedures (SOPs) and ensure that the user has been properly trained in both the SOPs and the VI HMIS software before a user license is provided. A copy of the user license should be kept on file at the agency.</p> <p>The System Administrator is required to revoke the user license and access of any user immediately upon termination of employment.</p> <p>All users are recommended to have completed a background check which is within 90 days of accessing the system. Users with any prior felony may be denied a user license.</p>	<p>User access Levels: Section A. Ethical Use of Data and user Agreements: Section A. User Licenses: Section C.</p>
<p><b>Communication:</b> Users are responsible for communicating any and all problems or concerns about the VI HMIS to his/her Agency Administrator.</p>	<p>COC requires that each agency designate a staff person to act as the Agency Administrator point of contact. The Agency Administrator, who receives special training, should receive questions from his/her users. When a question cannot be answered by the Agency Administrator, he/she may call upon the HMIS System Administrator/ HMIS Specialist. Communication from the HMIS System Administrator/HMIS Specialist to agencies is done through the Agency Administrator/Point of Contact, who should filter pertinent information down to front-line users.</p>	<p>Communication: Section A</p>
<p><b>Data Sharing:</b> Currently data sharing between agencies are limited to demographic information only.</p>	<p>Limited data sharing between agencies is permitted within the VI HMIS in order to avoid duplication into the system. The sharing is limited to demographic information. In order to share</p>	<p>Data Sharing: Section A Profile Information: Section D</p>

	<p>programmatic information, the agencies willing to share this level of data must submit a request in writing to HMIS Lead Agency.</p> <p>Users may not change default client record security. Users that are found to be inappropriately opening client records to other agencies will have their access to the VI HMIS immediately terminated.</p>	
<b>Policy</b>	<b>Procedure</b>	<b>Section Reference for Description</b>
<p><b>Client Rights, Consent, and Ethical Use of Data:</b> Each agency and user must abide by the terms of the agency privacy policy, the VI HMIS SOPs and the Terms and Conditions of Client Track.</p>	<p>Personal information collected about the persons served within programs must be protected. Misuse of this data can result in termination of access to the VI HMIS or personnel action by the agency.</p> <p>Each agency must have a privacy posting at the point of intake for review by users. The VI HMIS operates under a model of inferred consent, which means that permission to enter a client's information into the HMIS is inferred when a notice is posted and he/she accepts the services offered.</p> <p>Client's refusal to provide information or otherwise participate in HMIS shall not be reason to deny eligibility or services.</p>	<p>Ethical Use of Data/Client Rights and Consent: A Inferred Client Consent: D</p>
<p><b>Data Removal, Review and Grievances:</b> A client may request to see their HMIS data or may request that personally identifying information be removed from the HMIS.</p>	<p>Clients may follow the Agency's grievance policy on issues related to HMIS. Grievances related to HMIS that cannot be addressed at the agency level may be escalated in writing to the VI Virgin Islands Continuum of Care (COC).</p> <p>In response to a legitimate request from a client to remove his/her personally identifying information from the HMIS, the agency should remove such data from the client record within 72 hours. A record of these</p>	<p>Client Grievances: A Data Retrieval, Client: Section D</p>

	<p>transactions must be kept by the Agency Administrator.</p> <p>In response to requests to view his/her data in the HMIS, the agency administrator or case manager must provide a copy of the requested data within a reasonable time frame to the client. Requests for changes to client information are considered on a case by case basis.</p>	
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<b>Policy</b>	<b>Procedure</b>	<b>Section Reference for Description</b>
<p><b>Security and User Access:</b> Each organization (user) is provided with a unique user name and password.</p>	<p>Sharing of user names and passwords is prohibited in the VI HMIS. Sharing of user name/passwords is considered a serious breach of the user agreement and could result in sanctions and/or appropriate personnel action.</p>	<p>Security: Section B</p>
<p><b>Security and Data Retrieval:</b> Agencies must protect identified Data that is downloaded or retrieved from the HMIS onto local computers and/or networks.</p>	<p>Once identified data has been retrieved from the HMIS and saved to a PC, network or disk, the data must be kept secure through encryption and/or password protection. Storing identified data on floppy disks, CDs, flash drives or unprotected laptops is not recommended unless proper security precautions have been taken. Unencrypted or unprotected data from the HMIS may not be sent via email.</p>	<p>Extracted Data: Section B</p>
<p><b>Security Requirements for Agencies:</b> Because the VI HMIS is accessed over the internet and contains personal data that must be protected, each agency is required to follow a minimum set of guidelines to ensure security of the entire system.</p>	<p>Each agency must have the following protections in place on the network or stand-alone PC that accesses the VI HMIS:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Physical space of the computer must be protected to prevent unauthorized access;</li> <li><input type="checkbox"/> Use of non-agency computers (internet cafes, library) is prohibited;</li> <li><input type="checkbox"/> Each computer that is on the network must have current virus protection software that updates automatically;</li> <li><input type="checkbox"/> Each network or computer</li> </ul>	<p>Data Access Computer Requirements: B</p>

	must have a hardware or software firewall installed and active.	
<b>Training:</b> The System Administrator provides user training on a variety of HMIS topics.	Although initial user training may be conducted by the System Administrator, they also offer a schedule of user training on a monthly basis. The schedule for these trainings will be available from the System Administrator upon request.	Training: Section C
<b>Policy</b>	<b>Procedure</b>	<b>Section Reference for Description</b>
<b>Data Collection and Data Quality:</b> Each program is required to collect a series of data elements depending on the type of program it operates. The System Administrator data elements are largely based on HUD's Data and Technical Standards. Data entry must meet the System Administrator's data quality thresholds to be considered complete.	<p>Each program must have all the required data elements in the VI HMIS <b>weekly</b>. Data entry for the previous week must be completed on the following Monday.</p> <p>Data quality and integrity is expected of HMIS users. The System Administrator may perform data quality reviews and require corrective action if data quality does not meet threshold review.</p> <p>HUD-funded programs are required to submit an HMIS-generated APR every year to the CoC for review.</p>	<p>Required Data Collection: Section D. Specific data elements are detailed in Attachment B. Data Integrity: Section D</p>

# **The Virgin Islands Continuum of Care Homeless Management Information System (VI HMIS)**

## **Policies and Standard Operating Procedures**

This document details the policies, procedures, guidelines, and standards that govern the operations of the V.I. Homeless Management Information System (VI HMIS). It outlines the roles and responsibilities of all agencies and persons with access to VI HMIS data, and it contains important and useful information about the ways in which VI HMIS data is secured and protected. All Providers using the VI HMIS should read this document in full and train every end user within its agency and programs to understand its contents as necessary. Attachment A is a user license agreement, which includes a statement that the user has read and understands these operating procedures.

### **Introduction:**

The Virgin Islands Continuum of Care (COC) is a non-profit corporation under contract with the VI Department of Human Services (DHS) and the U.S. Department of Housing and Urban Development (HUD) to manage public homeless services in the US Virgin Islands. In order to accomplish this work, COC subcontracts for the direct provision of services to local providers.

DHS and HUD require COC to provide unduplicated statistical demographic reports on the numbers and characteristics of clients served as well as on program outcomes. In order to address the reporting requirements mandated by DHS and HUD, COC has implemented an electronic management information system that will provide the necessary demographic information and reports. This system is called the V.I. Homeless Management Information System (VI HMIS). Eccovia Solutions is the vendor of the web-based software known as *Client Track*, which was selected by COC's designated lead/central outreach agency (System Administrator), Methodist Training & Outreach Center, Inc. (MTOC). COC's System Administrator, MTOC provides or arranges for training and technical assistance to users of the VI HMIS. All Providers funded by DHS or that receive certain HUD grants (Supportive Housing Program, Shelter Plus Care, Emergency Solutions Grant, PATH, SSVF, and HOPWA)

are required to participate in the VI HMIS, and some privately funded providers participate on a voluntary basis. The guidance provided in this document aligns with requirements around using HMIS as stated in the [CoC Program interim rule](#) and the [Emergency Solutions Grant \(ESG\) program interim rule](#) and refers to the data elements required in an HMIS as established in the [2014 HMIS Data Standards](#).

Providers participating in the VI HMIS are required to collect and record certain data elements for all new and continuing clients in the HMIS (see Attachment B for a description of the universal and program-specific data elements required by program type) weekly. Data entry should be completed weekly. All records should be up to date every Monday for clients served during the prior week. All Providers using the VI HMIS are also required to comply with HUD's *HMIS Data and Technical Standards* (see Attachment C for an overview and a full copy of the Standards).

COC recognizes the importance of maintaining confidential client records in a secure environment to ensure that the information is not misused or accessed by unauthorized people. The following Policies and Standard Operating Procedures (SOP) have been developed to establish standards for the collection, storage and dissemination of confidential information by the users of the VI HMIS. COC has developed a privacy policy regarding the use and disclosure of data in the HMIS and by programs operated directly by COC (see Attachment D for a copy of this policy).

The VI HMIS allows for limited data sharing between agencies in order to avoid duplication into the system. The sharing is limited to demographic information. In order to share programmatic information, the agencies willing to share this level of data must submit a request in writing to HMIS Lead Agency.

HUD has awarded HMIS funds to the Methodist Training & Outreach Center who is designated by the CoC as the System Administrator for the VI HMIS and as such is the only entity able to access all the client-level information, including personal identifiers, contained in the VI HMIS. Acceptable uses and disclosures of the data are outlined in COC's privacy policy. For example, COC may disclose data that is required under a court order issued by a judge, to protect the health and safety of those being served in its programs, and may use de-identified data for research and analysis purposes. COC does not provide access to client-level data containing personal identifiers to any agency.

### **COC's HMIS Goals:**

The goals of the VI HMIS are to support and improve the delivery of homeless services in the US Virgin Islands. Inclusive in these goals is the improvement of the knowledge base about homelessness that contributes to an enlightened and effective public response to homelessness. The VI HMIS is a tool that facilitates the following:

- *Improvements in service delivery* for clients as case managers assess the client's needs, inform the client about available services on site or through referral, help the client find and keep permanent housing, and improve service coordination when information is shared between programs within one agency that are serving the same client.

- *A confidential and secure environment* that protects the collection and use of all client data including personal identifiers.
- The *automatic generation of standard reports* required by HUD or DHS, including the US Virgin Islands participation in the national Annual Homelessness Assessment Report (AHAR).
- *Generation of system-level data* and analysis of resources, service delivery needs and program outcomes for the US Virgin Islands' homeless population.
- *A data collection and management* tool for Authorized Agencies to administer and supervise their programs.

COC recognizes the need to maintain each client's confidentiality, and will treat the personal data contained within the VI HMIS with respect and care. As the guardians entrusted with this personal data, COC has both an ethical and a legal obligation to ensure that data is collected, accessed and used appropriately. Of primary concern to COC are issues of security (i.e. encryption of data traveling over the Internet, the physical security of the HMIS server), and the policies governing the release of this information to the public, government and funders.

Meeting the needs of homeless persons served by COC and its Providers is the underlying and most basic reason for having the VI HMIS, and employing it for continued improvements in program quality.

## Definitions

**Many of the terms used in this Policies and Standard Operating Procedures Manual may be new to many users. This document is not intended to replace the HMIS Data Dictionary, specific program guidance, requirements, regulations, notices, or the Data Manual, but to complement them. Please refer to [HUD Exchange](#) for updated definitions.**

**Definitions of some of these terms are as follows:**

**Agency Administrator:** The person responsible for system administration at the agency level.

**System Administrator:** This person/organization is responsible for administering the system and maintaining contact with the contracted company (Eccovia Solutions).

**Authentication:** The process of identifying a user in order to grant access to a system or resource; usually based on a username and password.

**Authorized Agency:** Any agency, organization or group who has an HMIS Agency

Agreement and/or contract with The COC and that are allowed access to the VI HMIS database. These Agencies connect independently to the database via the Internet.

**Eccovia Solutions:** The Company that wrote the software used for the VI HMIS. Eccovia Solutions also houses and maintains the server that holds our HMIS database.

**Client:** shall mean any recipient of services offered by a Provider or Authorized Agency.

**Client-level Data:** Data collected or maintained about a specific person. This type of data can be de-identified for purposes of data analysis, which means that personally identifying information is removed from the record.

**Community Agency:** Agencies participating in the VI HMIS that are not currently receiving funding from The COC.

**VI HMIS:** The specific HMIS utilized in the US Virgin Islands. Currently the VI HMIS uses software produced by Eccovia Solutions, called *Client Track*.

**VI HMIS System Administrator/HMIS Specialist:** The person who provides technical support and training to VI HMIS users. This person has the highest level of user access in Client Track and has full access to all user and administrative functions.

**Database:** An electronic system for organizing data so it can easily be searched and retrieved; usually organized by fields and records.

**De-identified Data:** Data that has been stripped of personally identifying information.

**Encryption:** Translation of data from plain text to a coded format. Only those with the “key” have the ability to correctly read the data. Encryption is used to protect data as it moves over the internet and at the database level through the use of special software.

**Firewall:** A method of controlling access to a private network, to provide security of data. Firewalls can use software, hardware, or a combination of both to control access.

**HMIS:** Homeless Management Information System. This is a generic term for any system used to manage data about homelessness and housing.

**HUD HMIS Data and Technical Standards (the Standards):** Standards HUD published in the July 30, 2004 Federal Register, Vol. 69, No. 146, pp. 45888 through 45934. These standards fall into three categories: a) data elements required to be collected by HMIS users including “universal” and “program specific” data elements; b) Privacy and Security Standards for data confidentiality; and c) Technical Standards for the creation of HMIS data systems.

**Identifying Information:** Information that is unique to an individual and that may be used to identify a specific person. Examples of identifying information are name and social security number.

**Module:** The Client Track software has several sections that focus on different types of functions related to HMIS, these sections, are known as “modules”. VI HMIS will use the universal module.

**Provider:** Shall mean any organization under contract with COC to provide outreach, shelter, housing, employment and/or social services to homeless people.

**Server:** A computer on a network that manages resources for use by other computers in the network. For example, a file server stores files that other computers (with appropriate permissions) can access. One file server can “serve” many files to many client computers. A database server stores a data file and performs database queries for client computers.

**Client Track:** A web-based software package developed by Eccovia Solutions which tracks data about people in housing crisis in order to determine individual needs and provide aggregate data for reporting and planning.

**COC:** The VI Virgin Islands Continuum of Care. The Council serves as the single territorial resource for homelessness planning and policy development, and advises the Governor and the Legislature on issues related to the problems of persons who are homeless or at risk of becoming homeless.

**MTOC:** The Methodist Training and Outreach Center. The Lead Outreach Agency designated to be the System Administrator and responsible for hiring the VI HMIS System Administrator/HMIS Specialist.

**User:** An individual who uses a particular software package; in the case of the VI HMIS, the *Client Track* software.

**User License:** An agreement with a software company that allows an individual to use the product. In the case of Client Track, user licenses are agreements between COC and Eccovia Solutions that govern individual connections to the VI HMIS. User licenses cannot be shared.

## **A. Organization and Management of the VI HMIS**

### **A.1. Project Management**

**Policy:** The COC designates the Methodist Training & Outreach Center (MTOC) responsible for project management and coordination of the VI HMIS. MTOC employs a HMIS Specialist who is the primary contact with Eccovia Solutions (ECCOVIA SOLUTIONS) and works with ECCOVIA SOLUTIONS to implement any necessary or desired system-wide changes and updates. In this role as Project Manager, MTOC endeavors to provide a uniform VI HMIS that yields the most consistent data for client management, agency reporting and service planning.

**Procedure:** All concerns relating to the policies and procedures of the HMIS should be addressed with MTOC's Executive Director/HMIS Specialist; however, the Director of COC is the final authority for policies and procedures of the VI HMIS.

## **A.2. VI HMIS System Administrator/HMIS Specialist**

**Policy:** MTOC employs a VI HMIS System Administrator/HMIS Specialist whose primary responsibility is the coordination and administration of the VI HMIS. In the absence of the VI System Administrator/HMIS Specialist, MTOC's Executive Director designates a backup staff member for responding to Authorized Agencies or develops a contingency plan for doing so.

**Procedure:** The VI HMIS System Administrator/HMIS Specialist manages day-to-day operations of the VI HMIS and is governed by a COC confidentiality agreement that allows access to client level data.

System Administrator/HMIS Specialist is responsible for the following:

- Manages agency user licenses; adding and removing licensed users for agency; The System Administrator is required to remove licensed users from the HMIS immediately upon termination from agency, placement on disciplinary probation, or upon any change in duties not necessitating access to HMIS information.
- Has access to all client data, user data and agency administration information for the Authorized Agency; thus is responsible for the quality and accuracy of these data.
- Trains Agency Administrator(s); this includes training all Authorized Agency staff on how to use *Client Track* as well as training to ensure compliance with privacy and security policies.
- Provides support for the generation of agency reports.
- Monitors and enforces compliance with standards of client confidentiality and ethical data collection, entry, and retrieval at the agency level.

## **A.3. Agency Administrator**

**Policy:** Agency Administrator is responsible on a day-to-day basis for enforcing the data and office security requirements under these Policies and Standard Operating Procedures for his/her organization. The Agency Administrator is also responsible for entering their organization's client data and maintaining communication with the System Administrator/HMIS Specialist.

**Procedure:** All system-wide questions and issues should be directed to System Administrator/HMIS Specialist.

## **A.4. User Access Levels**

**Policy:** All VI HMIS Users will have a level of access to HMIS data that is appropriate to the duties of their position so that information is recorded and accessed on a “need to know” basis. All users should have the level of access that allows efficient job performance without compromising the security of the VI HMIS or the integrity of client information.

**Explanation:** The VI HMIS provides appropriate and layered levels of access to ensure the security of HMIS data. *Client Track* allows multiple levels of user access to data contained in the database. Access is assigned when new users are added to the system and can be altered as needs change. The ability to change user access levels allows for legitimate changes in agency needs and removes the temptation to share logins in order to by-pass access restrictions. In the interest of client data security, the System Administrator will always attempt to assign the most restrictive access that allows efficient job performance.

## **A.5. System Administrator Communication with Authorized Agencies**

**Policy:** The VI HMIS System Administrator/HMIS Specialist is responsible for relevant and timely communication with each agency regarding the VI HMIS. The VI HMIS System Administrator/HMIS Specialist will communicate system-wide changes and other relevant information to Agencies as needed. He/she will also maintain a high level of availability to Authorized Agencies.

**Explanation:** Good communication is essential to the proper functioning of any system, electronic or otherwise. Providing a single point of communication simplifies and speeds communications within the VI HMIS.

**Procedure:** General communications from the VI HMIS System Administrator/HMIS Specialist will be directed towards the Agency Administrator’s Executive Director. Specific communications will be addressed to the person or people involved. The VI HMIS System Administrator/HMIS Specialist will be available via email, phone, and mail. While specific problem resolution may take longer, the VI HMIS System Administrator/HMIS Specialist will strive to respond to Authorized Agency questions and issues within three business days of receipt. In the event of planned unavailability, the VI HMIS System Administrator/HMIS Specialist will notify Authorized Agencies in advance and designate a backup contact. Information affecting all users will be directed to the Agency Administrator’s Executive Director. Agency Administrators are responsible for distributing that information to any additional people at their agency who may need to receive it, including, but not limited to, Executive Directors, client intake workers, and data entry staff.

## **A.6. Authorized Agency Communication with MTOC**

**Policy:** Authorized Agencies are responsible for communicating needs and questions regarding the VI HMIS directly to the MTOC HMIS Staff.

**In order to foster clarity both for VI HMIS users and for ECCOVIA SOLUTIONS, ALL communications with ECCOVIA SOLUTIONS regarding the VI HMIS must go through the MTOC HMIS Staff.**

**Explanation:** MTOC holds the contract with ECCOVIA SOLUTIONS, and is therefore responsible for acting as the primary contact for the VI HMIS. A designated point of communication within MTOC simplifies and speeds up communications regarding the VI HMIS.

**Procedure:** Users at Authorized Agencies will communicate issues, needs and questions to the MTOC HMIS Staff via email, phone or mail. The MTOC's HMIS staff will attempt to respond to Authorized Agency needs within three business days of the first contact. If the MTOC HMIS Staff cannot resolve the issue, they may contact ECCOVIA SOLUTIONS for further technical assistance. Should an HMIS issue require additional attention, the Agency's Executive Director may contact the MTOC's Executive Director in writing to express their issues, concerns, or desires.

## **A.7. System Availability**

**Policy:** MTOC and ECCOVIA SOLUTIONS will provide a highly available database server and will inform users in advance of any planned interruption of Service.

**Explanation:** A highly available database affords agencies the opportunity to plan data entry, management, and reporting according to their own internal schedules. Availability is the key element in maintaining an HMIS that is a useful tool for Authorized Agencies to use in managing programs and services.

**Procedure:** No computer system achieves 100% uptime. Downtime may be for routine maintenance, in the event of a disaster or due to systems failures beyond the control of ECCOVIA SOLUTIONS or MTOC. In the event of disaster or routine planned server downtime, ECCOVIA SOLUTIONS will contact the MTOC HMIS System Staff. The MTOC HMIS staff will contact Agency Administrators and inform them of the cause and duration of the interruption in service. The MTOC HMIS Staff will log all downtime for purposes of system evaluation. In the event that it is needed, ECCOVIA SOLUTIONS is required to have redundant systems in place so that connection to the server can be restored as quickly as possible.

## **A.8. Inter-Agency Data Sharing**

**Policy:** There is currently limited client data sharing between Authorized Agencies within the VI HMIS. The programmatic data included in the client's record will remain restricted across organization, unless otherwise stated.

**Explanation:** The need for client confidentiality and the benefit of integrated case management should be balanced when discussing inter-agency data sharing. During the HMIS planning process, providers were not in favor of electronic data sharing of programmatic data within the HMIS. These Standard Operating Procedures may be amended in the future to include data sharing between Authorized Agencies and to state explicitly how data may be shared if the community of users/providers supports that change.

## **A.9. Ethical Data Use**

**Policy:** Data contained in the VI HMIS will only be used to support or report on the delivery of homeless and housing services in the US Virgin Islands. Each HMIS User will affirm the principles of ethical data use and client confidentiality contained in the VI HMIS Policies and Standard Operating Procedures Manual and the HMIS User Agreement. Each Authorized Agency must have a written privacy policy that includes policies related to employee misconduct or violation of client confidentiality. All HMIS Users must understand their Agency's privacy policy, and a signed policy statement must become a permanent part of the employee's personnel file.

**Explanation:** The data collected in the VI HMIS is the personal information of people in the US Virgin Islands community who are experiencing a housing crisis. It is the user's responsibility as the guardian of that data to ensure that it is only used to the ends to which it was collected and in and the manner to which the individual client has given consent.

**Procedure:** All HMIS users will sign an HMIS User Agreement before being given access to the VI HMIS. Any individual or Authorized Agency misusing, or attempting to misuse HMIS data will be denied access to the database, and his/her/its relationship the VI HMIS may be terminated.

## **A.10. Access to HMIS Database**

**Policy:** No one but MTOC, System Administrator (or its designee) and/or ECCOVIA SOLUTIONS will have direct access to the VI HMIS database through any means other than the *ClientTrack* software, unless explicitly given permission by MTOC during a process of software upgrade, conversion or for technical assistance.

**Explanation:** This policy prevents a user from accessing the HMIS database and viewing its contents, thus rendering the security measures within *ClientTrack* ineffectual.

**Procedure:** Under its contract with MTOC, ECCOVIA SOLUTIONS will monitor both our web application server and our database server and employ updated security methods to prevent unauthorized database access. Also, any party who has access to

the VI HMIS database (ECCOVIA SOLUTIONS) must sign a Health Insurance Portability and Accountability Act (HIPAA)-compliant confidentiality agreement prior to system access.

## **A.11. Client Rights and Confidentiality of Records**

**Policy:** The VI HMIS System operates under a protocol of *inferred consent* to include client data in the HMIS. Each Authorized Agency is required to post a sign about their privacy policy in a place where clients may easily view it (at the point of intake, on a clipboard for outreach providers, in a case management office). The privacy posting should include a statement about the uses and disclosures of client data as outlined in this document. Written authorization for inclusion of a client's data in HMIS is not required, but is inferred when a client accepts the services offered by the program and when the privacy posting is displayed for client review. Clients may opt out of HMIS or be unable to provide basic personal information. Clients have the right of refusal to provide personal identifying information to the HMIS, except in cases where such information is required to determine program eligibility or is required by the program's funders. Such refusal or inability to produce the information shall not be a reason to deny eligibility or services to a client. When a client exercises his/her right of refusal, de-identified demographic (anonymous) information will be entered into the HMIS. Each Authorized Agency shall take appropriate steps to ensure that authorized users only gain access to confidential information on a "need-to-know" basis in accordance with COC's Privacy Policy. Authorized Agencies will ensure the confidentiality of all client data as described in this document.

**Explanation:** The data in the VI HMIS is personal data, collected from people in a vulnerable situation. Authorized Agencies are ethically and legally responsible to protect the confidentiality of this information. The VI HMIS will be a confidential and secure environment protecting the collection and use of client data.

**Procedure:** Access to client data will be controlled using secure access methods and restrictive access policies. Each Authorized Agency (including MTOC) must develop and make available a privacy policy related to client data captured in HMIS and through other means. A posting that summarizes the privacy policy must be placed in an area easily viewed by clients. Only individuals authorized to view or edit individual client data in accordance with the stated privacy policies and these Standard Operating Procedures will have access to that data. The VI HMIS will employ a variety of technical and procedural methods to ensure that only authorized individuals have access to individual client data.

## **A.12. Authorized Agency Grievances**

**Policy:** Authorized Agencies will contact the VI HMIS System Administrator/HMIS Specialist to resolve HMIS problems including but not limited to operation or policy issues. If an issue needs to be escalated, Authorized Agencies may

**contact MTOC's Executive Director. The Executive Director of MTOC with advisement from the COC will have the final say over all grievances that arise pertaining to the use, administration and operation of the VI HMIS.**

**Explanation:** In order for the VI HMIS to serve as an adequate tool for Authorized Agencies and guide for system-wide planning, any HMIS problems must be addressed by the organization with the means to affect system-wide change. Because many agencies with varied funding streams and applicable laws participate in the HMIS, MTOC's Executive Director (rather than DHS or HUD) is the appropriate party for resolution of sensitive issues that must be escalated beyond the VI HMIS System Administrator/HMIS Specialist

**Procedure:** Authorized Agencies will bring HMIS problems or concerns to the attention of the VI HMIS System Administrator/HMIS Specialist, who may ask for these issues to be stated in writing. If problems, concerns or grievances cannot be resolved by the VI HMIS System Administrator/HMIS Specialist or if it is not appropriate to raise the issue with the VI HMIS System Administrator/HMIS Specialist, the issue will be directly relayed to MTOC's Executive Director via phone, email or mail.

### **A.13. Client Grievance**

**Policy:** Clients must contact the Authorized Agency with which they have a grievance for resolution of VI HMIS problems. Authorized Agencies will report all HMIS-related client grievances to the System Administrator, MTOC. If the Authorized Agency's grievance process has been followed without resolution, the Authorized Agency may escalate the grievance to COC. At any time, clients may request that their personally-identifying information be removed from the VI HMIS.

**Explanation:** A clear and effective client grievance policy protects the needs of the client and the confidentiality of client data.

**Procedure:** Each Authorized Agency is responsible for answering questions, complaints, and issues from their own clients regarding the VI HMIS. Authorized Agencies will provide a copy of their privacy policy and/or of the COC's HMIS Policies and Standard Operating Procedures Manual upon client request. Client complaints should be handled in accordance with the Authorized Agency's internal grievance procedure, and then escalated to System Administrator, MTOC in writing if no resolution is reached. MTOC is responsible for the overall use of the VI HMIS, and will respond if users or Authorized Agencies fail to follow the terms of the HMIS agency agreements, breach client confidentiality, or misuse client data. Authorized Agencies are obligated to report all HMIS-related client problems and complaints to MTOC, which will determine the need for further action. The VI HMIS System Administrator/HMIS Specialist will record all grievances and will report these complaints to the MTOC's Executive Director. Resulting actions might include further investigation of incidents, clarification or review of policies, or sanctioning of users and Agencies if users or Agencies are found to have violated standards set forth in VI HMIS Agency Agreements or the Policies and

Standard Operating Procedures Manual. Upon the client's request for data removal from the VI HMIS, the Agency Administrator will delete all personal identifiers of client data within 72 hours. A record of these transactions will be kept by the Agency Administrator. The Agency Administrator will also inform the System Administrator of these transactions.

## **A.14. Authorized Agency Hardware/Software Requirements**

**Policy:** When possible and as funds permit, System Administrator, MTOC will assist Authorized Agencies in obtaining hardware (computers) for access to the VI HMIS. If MTOC is unable to assist in this task, Authorized Agencies will provide their own hardware (computers) necessary to access the VI HMIS.

**Explanation:** The COC understands the cost and difficulty of acquiring and maintaining computers and Internet access. MTOC may be able to assist in these costs, but funds are limited.

**Procedure:** Contact the MTOC's Executive Director for the current status of assistance availability.

**Hardware/Software Requirements:** ClientTrack is web-enabled software; all that is required to use the database is a computer, a valid username and password, and the ability to connect to the Internet using internet browser software (Internet Explorer 5.5 or higher). There is no unusual hardware or additional ClientTrack-related software or software installation required. ECCOVIA SOLUTIONS guidelines state the following minimum and recommended workstation specifications.

### **Minimum Workstation Requirements**

- Computer: PC 500 MHz or better
- Web Browser: Microsoft Internet Explorer 5.5 or higher or
- Hard Drive: 2 GB
- 64 MB RAM
- Internet Connectivity (broadband or high-speed)
- SVGA monitor with 800 x 600+ resolution
- Keyboard and Mouse

### **Recommended Workstation Requirements**

- Computer: 1 Gigahertz Pentium Processor PC
- Browser: Microsoft Internet Explorer 6.0 or higher or Netscape 7 or higher
- 20 GB Hard Drive
- 256 MB RAM
- Broadband Internet Connection - 128 kbps (hosted version) or LAN connection
- SVGA monitor with 800x600 + resolution
- Keyboard and mouse

Although there is no unusual hardware or additional ClientTrack-related software required to connect to the database, the speed and quality of the Internet connection and the speed of the hardware and could have a profound affect on the ease of data entry and report extraction. A high-speed Internet connection, like a DSL or ISDN line with speeds at or above 128.8 Kbps, is preferred, as is a computer with speeds above 166MHz. ECCOVIA SOLUTIONS also recommends the use of Windows 2000 or XP (1 GHZ models or faster) as the Windows platform to eliminate certain technical problems.

### **A.15. Authorized Agency Technical Support Assistance**

**Policy:** The System Administrator, MTOC will provide technical assistance including ongoing software support for users of the VI HMIS. Internal hardware and internet connectivity issues should be addressed by the Authorized Agency's internal IT staff to the extent possible.

**Explanation:** Even though the equipment and internet connection used to connect to the VI HMIS is owned by the Authorized Agency, MTOC will provide technical assistance when possible and as resources allow.

**Procedure:** Hardware and connectivity issues not related to the HMIS software should be addressed by the Authorized Agency's internal IT staff. Authorized Agencies may contact the VI HMIS System Administrator/HMIS Specialist for technical support of the components necessary to connect to the VI HMIS.

### **A.16. Users' Guide**

**Policy:** MTOC will provide a VI HMIS Users' Guide and Data Dictionary for all VI HMIS Users.

**Explanation:** An internal users' guide and Data Dictionary provides software users with information about how the software product is used in a particular community. The VI HMIS Users' Guide will provide specific technical instruction to VI HMIS Users about how to use ClientTrack.

**Procedure:** The VI HMIS System Administrator/HMIS Specialist will distribute and update the VI HMIS (Client Track) Users' Guide. These will include procedures that are held in common for all Authorized Agencies, and forms for customizing the Users' Guide for each Authorized Agency. The Client Track User's Guide will be provided to all users during user training.

### **A.17. Monitoring and Evaluation**

**Policy:** MTOC will regularly monitor and evaluate the effectiveness of the VI HMIS and, based on the information received, will continue to make enhancements to the VI HMIS and the Policies and Standard Operating Procedures as necessary. MTOC will also include HMIS in its standard contractor monitoring protocol. This may include compliance with the HMIS Standard Operating Procedures and with HUD's Data and Technical Standards.

**Explanation:** Monitoring and evaluation helps ensure security and proper usage of the VI HMIS.

**Procedure:** The VI HMIS System Administrator/HMIS Specialist will conduct internal system monitoring and may contact Agency Administrators to schedule monitoring and evaluation visits. MTOC's monitoring staff may also contact Agency Administrators or other Authorized Agency staff in relation to the HMIS portion of standard monitoring visits conducted by MTOC over the course of each year.

## **B. Security and Access:**

### **B.1. User Access**

**Policy:** The VI HMIS System Administrator/HMIS Specialist will provide unique user names and initial passwords to each Authorized Agency user. User names will be unique for each user and will not be exchanged or shared with other users. The VI HMIS System Administrator/HMIS Specialist will have access to the list of user names for the VI HMIS and will track user name distribution and use. Only MTOC will be authorized to purchase or grant additional user licenses to an Agency that has utilized all current licenses.

**Explanation:** Unique user names and passwords are the most basic building block of data security. Not only is each user name assigned a specific access level, but in order to provide to clients or program management an accurate record of who has altered a client record, when it was altered, and what the changes were (called an "audit trail") it is necessary to log a user name with every change. Exchanging or sharing user names seriously compromises the security of the VI HMIS, and will be considered a breach of the user agreement and will trigger appropriate repercussions and/or sanctions for the user and agency.

**Procedure:** The VI HMIS System Administrator/HMIS Specialist will provide unique user names and initial passwords to each user upon completion of training and signing of a confidentiality agreement and receipt of the Policies and Standard Operating Procedures Manual. The sharing of user names will be considered a breach of the user agreement. Agency Administrators are responsible for distributing user names and initial passwords to agency users as well as for providing current users with a new password if he/she requires one.

## **B.2. User Changes**

**Policy:** The Authorized Agency Administrator will request for the VI HMIS System Administrator/HMIS Specialist to make any necessary changes to the Authorized Agency's user accounts. This includes issuance of new passwords, revoking authorization for staff members that are no longer with the agency and managing access levels, etc.

**Explanation:** The VI HMIS System Administrator/HMIS Specialist has the ability to change user names and redistribute user licenses to accommodate Authorized organizations.

**Procedure:** The VI HMIS System Administrator/HMIS Specialist will make any necessary changes to the list of Authorized Agency users. Changes in Agency Administrators must be reported to the VI HMIS System Administrator/HMIS Specialist.

For employees with user access leaving the agency, the user password should be changed at the end of business on the person's last day of employment.

## **B.3. Passwords**

**Policy:** Users will have access to the VI HMIS via a user name and password. Passwords must be changed once an employee with access information leaves the organization. Users will keep passwords confidential. Under no circumstances shall a licensed user share a password nor shall they post their password in an unsecured location.

**Explanation:** Users will have access to the VI HMIS via a user name and password. These methods of access are unique to each user and confidential. Users are responsible for keeping their passwords confidential. For security reasons, passwords will be reset once an employee with access information leaves the organization.

**Procedure:** The VI HMIS System Administrator/HMIS Specialist will issue a user name and password to each new user who has completed training. See Section B.1 for additional detail on password security.

## **B.4. Password Recovery**

**Policy:** The VI HMIS System Administrator/HMIS Specialist will reset a user's password in the event the password is lost or forgotten. The VI HMIS System Administrator/HMIS Specialist must validate the authenticity of the request if the request is not made in person.

**Explanation:** In any secure system, there is a danger that users will lose or forget their passwords.

**Procedure:** In the event of a lost or forgotten password, the user whose password is lost will contact the VI HMIS System Administrator/HMIS Specialist. The VI HMIS System Administrator/HMIS Specialist will reset the user's password, and issue a new password to allow the user to login. The VI HMIS System Administrator/HMIS Specialist must validate the authenticity of the request if the request is not made in person. In other words, the VI HMIS System Administrator/HMIS Specialist shall not issue a new password without ensuring that the person requesting it is, in fact, the person with the authorization to use it. For example, if a request is made by phone or email, the VI HMIS System Administrator/HMIS Specialist should call the user back at his/her desk (using the contact number on file) before issuing a new password.

## **B.5. Extracted Data**

**Policy:** VI HMIS users will maintain the security of any client data extracted from the database and stored locally, including all data used in custom reporting. VI HMIS users should not electronically transmit any unencrypted client data across a public network.

**Procedure:** Data extracted from the database and stored locally will be stored in a secure location (not on floppy disks/CDs or other temporary storage mechanisms like flash drives or on unprotected laptop computers, for example) and will not be transmitted outside of the private local area network unless it is properly protected via encryption or by adding a file-level password. The VI HMIS System Administrator/HMIS Specialist will provide help in determining the appropriate handling of electronic files. All security questions will be addressed to the VI HMIS System Administrator/HMIS Specialist. Breach of this security policy will be considered a violation of the user agreement, which may result in personnel action and/or agency sanctions.

## **B.6 Data Access Computer Requirements**

**Policy:** Users will ensure the confidentiality of client data, following all security policies in the COC HMIS Policies and Standard Operating Procedures Manual and adhering to the standards of ethical data use, regardless of the location of the connecting computer. All Policies and Procedures and security standards will be enforced regardless of the location of the connecting computer. MTOC may restrict access to the VI HMIS to specific computers in the future.

**Explanation:** Because ClientTrack is web-enabled software users could conceivably connect to the database from locations other than the Authorized Agency itself, using computers other than agency-owned computers. Connecting from a non-agency location may introduce additional threats to data security, such as the ability for non-ClientTrack / VI HMIS users to view client data on the computer screen. If such a connection is made, the highest levels of security must be applied, and client

confidentiality must still be maintained. This includes only accessing the VI HMIS via a computer that has virus protection software installed and updated.

**Procedure:** Each Authorized Agency and Agency Administrator is responsible for:

- A. Physical Space. Authorized Agencies must take reasonable steps to insure client confidentiality when licensed users are accessing the VI HMIS. Licensed users are required to conduct data entry in a protected physical space to prevent unauthorized access to the computer monitor while confidential client information is accessible.
- B. Use of a non-agency computer located in a public space (i.e. internet café, public library) to connect to HMIS is prohibited.
- C. Each computer that accesses HMIS must have current virus software that updates automatically installed.
- D. If the HMIS is accessed over a network, the network must be protected by a hardware or software firewall at the server. A stand-alone machine that accesses HMIS must also have a hardware or software firewall installed and active. This may be the firewall protection included as part of the operating system or the virus protection software installed on the computer.

**Questions about security of the VI HMIS should be referred to the VI HMIS System Administrator/HMIS Specialist**

## **C. Agency Participation Requirements**

### **C.1 VI HMIS Agency Agreements**

**Policy:** Only Authorized Agencies will be granted licenses to access the VI HMIS system. The COC shall make the sole determination to identify Authorized Agencies. For agencies that have contracts with COC, the agency agreement for each program is contained within the contract. For non-contracted agencies, the Executive Director will be required to sign a “HMIS Authorized Agency Agreement” (Attachment E1) binding their organization to the COC HMIS Policies and Standard Operating Procedures and all applicable laws and regulations regarding the handling of client data before access is granted.

**Explanation:** COC has final authority over the VI HMIS. In order to ensure the integrity and security of sensitive data, MTOC will regulate access to this data. Only Agencies that have agreed to the terms set out in the HMIS Agency Agreement and or COC Contract will be allowed access to the VI HMIS. The agency agreements will include terms and duration of access, an acknowledgement of receipt of the Policies and Standard Operating Procedures Manual, and an agreement to abide by all provisions contained therein.

**Procedure:** Authorized Agencies will be given a copy of the HMIS Agency Agreement or contract, the Policies and Standard Operating Procedures Manual, and any other relevant paperwork in time for adequate review and signature. Once that paperwork has been reviewed and signed by the Executive Director, the VI HMIS System Administrator/ HMIS Specialist will issue a certain number of licenses for use by the agency and assist with the set-up of an Agency Administrator.

## **C.2. User Licenses**

**Policy:** In order to obtain a license, a user must successfully complete a MTOC conducted training program and must sign a User License (Attachment A) upon completing training. All users are recommended to have completed a background check within 90 days of accessing the system. Users with any prior felony may be denied a user license. **Sharing of licenses, User IDs or passwords is strictly prohibited. If necessary, Authorized Agencies may purchase additional User Licenses from ECCOVIA SOLUTIONS through MTOC. The cost for User Licenses will be determined by ECCOVIA SOLUTIONS, and will not be changed by the COC or MTOC.**

**Explanation:** MTOC purchases a number of user licenses on behalf of the COC and determines the number of users appropriate for participating agencies. Authorized Agencies may need to purchase additional User Licenses. This purchase can be made at any time.

**Procedure:** Each Agency Executive Director will identify the staff designated to be the licensed users of the VI HMIS and submit the names to the VI HMIS System Administrator/ HMIS Specialist. Each participating Agency will be issued one license. Authorized Agencies wishing to purchase additional User Licenses will complete a User License Purchase Form (Attachment E2). The Authorized Agency will return this form, with a check to cover the cost of the licenses, to MTOC. The VI HMIS System Administrator/ HMIS Specialist will purchase the User Licenses from ECCOVIA SOLUTIONS and forward the check and copy of the request form to the MTOC Finance Department for deposit. The VI HMIS System Administrator/ HMIS Specialist will setup the newly purchased account online, through the ClientTrack program. The VI HMIS System Administrator/ HMIS Specialist will then notify the Authorized Agency when the additional Licenses are available. ECCOVIA SOLUTIONS invoices MTOC for the cost of the licenses.

## **C.3. User Activation**

**Policy:** Each Authorized Agency is responsible for the distribution of its own user licenses through the Executive Director. Each new user will be issued a user name and password to access the VI HMIS upon approval by the Authorized Agency, completion of ClientTrack training, and signing of the HMIS User Agreement. Every user must receive appropriate ClientTrack training before being issued a user name and password.

**Explanation:** Authorized Agencies will determine which of their employees will have access to the VI HMIS. This allows for the needed flexibility in selecting users.

**Procedure:** The VI HMIS System Administrator/ HMIS Specialist will distribute user licenses for Authorized Agencies, adding and deleting users as needed. Agency Administrators are responsible for notifying MTOC of user changes. The VI HMIS System Administrator/ HMIS Specialist will be responsible for training new users. MTOC will provide training to Agency Administrators and will supplement this training as necessary through the regular training schedule or through on-site visits.

#### **C.4. HMIS User Agreements**

**Policy: Each Authorized Agency User will sign an HMIS User Agreement before being granted access to the VI HMIS.**

**Explanation:** Before being granted access to the VI HMIS, each user must sign an HMIS User Agreement, stating that he or she has received training, will abide by the COC HMIS Policies and Standard Operating Procedures Manual, will appropriately maintain the confidentiality of client data, and will only collect, enter and retrieve data in the VI HMIS relevant to the delivery of services to people in housing crisis in the US Virgin Islands.

**Procedure:** The VI HMIS System Administrator/ HMIS Specialist will distribute VI HMIS User Agreements to new VI HMIS Users for signature. The existence of a signed VI HMIS User Agreement for each active user will be verified in the annual HMIS on-site review or may be checked during regular MTOC monitoring of contracts. Allowing a user access to the VI HMIS without a signed user agreement is a violation of the COC HMIS Standard Operating Procedures and may result in program sanctions.

#### **C.5. Training**

**Policy: MTOC is responsible for defining training needs, identifying trainers and organizing training sessions for Authorized Agencies. MTOC will provide various training options, to the extent possible, based on the needs of HMIS users. MTOC will provide for adequate and timely ClientTrack training.**

**Explanation:** In order for the VI HMIS to be a benefit to clients, a tool for Authorized Agencies and a guide for planners, all users must be adequately trained to collect, enter and extract data.

**Procedure:** MTOC will provide access to training for all VI HMIS users. Agency Administrators will be given additional training relevant to their position. Agency Administrators will also be trained to provide basic user training for new users at their agency and will be expected to do so prior to issuing a user license to any new user.

This will allow Authorized Agencies to adjust to their own staffing needs with as little interruption in database use as possible. The VI HMIS System Administrator/ HMIS Specialist will provide support to Agency Administrators, who will in turn provide for user training needs.

## **C.6. Contract Termination Initiated by Authorized Agency**

**Policy:** Authorized Agencies that are not COC contractors may terminate the HMIS Agency Agreement with or without cause upon 30 days written notice to COC and according to the terms specified in the HMIS Agency Agreement. The termination of the HMIS Agency Agreement by the Authorized Agency may affect other contractual relationships with The COC and/or requirements set forth in contracts issued by HUD. In the event of termination of the HMIS Agency Agreement, all data entered into the VI HMIS will remain an active part of the VI HMIS, and records will remain closed.

**Explanation:** While non-COC contracted Authorized Agencies may terminate relationships with The COC and the VI HMIS, the data entered prior to that termination would remain part of the database. This is necessary for the database to provide accurate information over time and information that can be used to guide planning for community services in U.S. Virgin Islands. The termination of the HMIS Agency Agreement may affect other contractual relationships with The COC and/or HUD.

**Procedure:** COC Provider Agencies are required to participate in the VI HMIS as a condition of their funding. For all non-COC Authorized Agencies terminating the HMIS Agency Agreement, the person signing the HMIS Agency Agreement (or a person in the same position within the agency) will notify MTOC's Executive Director 30 days or more from the date of termination. The Executive Director will notify the VI HMIS System Administrator/ HMIS Specialist. In all cases of termination of HMIS Agency Agreements, the VI HMIS System Administrator/ HMIS Specialist will deactivate all users from that Authorized Agency on the date of termination of agreement.

## **C.7. Contract Termination Initiated by COC**

**Policy:** The COC may terminate the HMIS Agency Agreement for non-compliance with the terms of the agreement or with the HMIS Standard Operating Procedures with written notice to the Authorized Agency. The COC may also terminate the HMIS Agency Agreement with or without cause with 15 days written notice to the Authorized Agency and according to the terms specified in the HMIS Agency Agreement. If a COC contract is terminated under the terms of that contract, the agreement for VI HMIS access for that program will also be terminated. In that case, access will be renegotiated by COC to the agency if appropriate and in accordance with these standard operating procedures. The termination of the VI HMIS Agency Agreement or contract by COC may affect other contractual relationships with The COC or with HUD. In the event of termination of the VI HMIS Agency Agreement or COC contract, all data entered into the VI HMIS will

remain a part of the VI HMIS and records will remain closed. If termination of the VI HMIS Agency Agreement or COC contract occurs, all Authorized Agency users will be deactivated on the date the VI HMIS Agency Agreement or contract is terminated.

**Explanation:** While The COC may terminate the HMIS Agency Agreement or its contract with the Authorized Agency, the data entered by that Authorized Agency prior to termination of contract would remain part of the database. This is necessary for the database to provide accurate information over time and information that can be used to guide planning for community services in U.S Virgin Islands. The termination of the VI HMIS Agency Agreement may affect other contractual relationships with The COC or with HUD.

**Procedure:** COC Provider Agencies are required to participate in the VI HMIS as a condition of their funding.

## **D. Data Collection, Quality Assurance and Reporting**

### **D.1. Required Data Collection**

**Policy:** Providers funded by HUD (either through COC or directly) through the Supportive Housing Program, Shelter Plus Care, HOPWA, PATH, SSVF Section 8 Moderate Rehabilitation and the Emergency Solutions Grant are required to participate in HMIS by HUD. Other providers contracted by COC are also required to participate in the VI HMIS. All Authorized Agencies that participate in HMIS are required to comply with HUD's *HMIS Data and Technical Standards* unless those standards are in conflict with local laws. This includes the collection of required data elements. Providers shall attempt to collect basic information as detailed in Attachment B on every client served by the Provider upon intake into the Provider's facility or program. In the case of outreach, the Provider shall attempt to collect basic information outlined in Attachment B during engagement on the street. If client refuses or is unable to provide basic information, providers shall, at a minimum, enter each client as an Anonymous Entry into the VI HMIS system. Authorized Agencies may choose to collect more client information for their own case management and planning purposes.

**Assessment Data Collection:** Providers of certain programs shall attempt to conduct detailed assessments on each client who has gone through the intake process and has been accepted into the Provider's facility or program. At a minimum, providers shall attempt to collect the assessment information required as part of HUD's Data and Technical Standards.

**Timeliness of Data Entry:** Providers are required to enter basic client intake data into the VI HMIS weekly. All data entry must be completed on the following Monday for clients served during the prior week.

**Explanation:** In order for the data contained within the VI HMIS to be useful for data analysis and reporting to funders, certain minimum data must be consistently collected throughout the system.

## **D.2. Client Consent**

**Policy:** Each agency must post a sign at each intake or comparable location explaining the reasons for data collection for those seeking services. Consent for entering of data into VI HMIS may be inferred when the proper privacy notice is posted and if the client accepts the services offered. The client has the option to opt out of allowing his or her identifying information to be added to the database. In that case, the client's data should be added to the VI HMIS without identifiers as described above, although the record should be tracked internally by the agency to minimize the number of duplicate records for one client.

**Explanation:** Privacy Policies should be in effect for each agency to both inform clients about the uses and disclosures of their personal data and to protect the agency by establishing standard practices for the use and disclosure of data. Each client must give permission for the disclosure and/or use of any client data outside of the privacy policy developed and posted by the agency. Client consent notices must contain enough detail so that the client may make an informed decision. Clients may withdraw permission to have their personal protected information in the VI HMIS, or may make a request to see copies of his or her client record.

**Procedure:** Authorized Agencies will develop a privacy policy, which will be posted in appropriate areas for client review. COC will review the privacy notices as part of the annual VI HMIS review and/or through regular monitoring. If a client denies permission to enter confidential data, the Authorized Agency will enter the de-identified data into the VI HMIS and track the record to minimize duplicate records for each client.

## **D.3. Client Consent Forms to Share Data**

**Policy:** The VI HMIS is currently allows limited electronic sharing of data between agencies. Each agency should include in its privacy policy that data collected by the agency is disclosed to COC as part of its administrative responsibility for the VI HMIS and that the data may be used for analysis and reporting purposes. COC will only report aggregate and/or de-identified data as part of its responsibilities, and agrees to maintain the data with the highest level of confidentiality and within the security guidelines set forth in this document.

**Procedure:** Unless otherwise stated or agreed upon and with the permission of the Authorized Agencies' Executive Director, only limited data sharing is allowed between agencies.

## **D.4. Appropriate Data Collection**

**Policy:** VI HMIS users will only collect client data relevant to the delivery of services to people in housing crises in US Virgin Islands and/or required by funders or by law.

**Explanation:** The purpose of the VI HMIS is to support the delivery of homeless and housing services in US Virgin Islands. The database should not be used to collect or track information not related to serving people in housing crises or otherwise required for policy development and planning purposes.

**Procedure:** Agency Administrator will ask the VI HMIS System Administrator/HMIS Specialist for any necessary clarification of appropriate data collection. The VI HMIS System Administrator/HMIS Specialist, in consultation with COC senior management, will make decisions about the appropriateness of data being entered into the database.

## **D.5. Data Ownership**

**Policy:** The VI HMIS, and any and all data stored in the VI HMIS, is the property of The COC and MTOC. COC and MTOC has authority over the creation, maintenance and security of the VI HMIS. Violations of the HMIS Agency Agreement, the Standard Operating Procedures, privacy policies developed at the agency level, or other applicable laws may subject the Authorized Agency to discipline and/or termination of access to the VI HMIS.

**Procedure:** The VI HMIS Agency Agreement and/or COC contract includes terms regarding the maintenance of the confidentiality of client information, provisions regarding the duration of access, an acknowledgement of receipt of the Policies and Standard Operating Procedures Manual and an agreement to abide by all policies and procedures related to the VI HMIS including all security provisions contained therein. Because programs participating in the VI HMIS are funded through different streams with different requirements (HUD, DHS, blended, and other), COC shall maintain ownership of the database in its entirety in order that these funders cannot access data to which they are not legally entitled.

## **D.6. Data Integrity**

**Policy:** VI HMIS users will be responsible for the accuracy of their data entry. Authorized Agency Executive Director will be responsible for ensuring that data entry by users is being conducted in a timely manner and will also ensure the accuracy of the data entered.

**Explanation:** The quality of VI HMIS data is dependent on individual users to take responsibility for the accuracy and quality of their own data entry. Agency Executive

Directors and/or Agency Administrator are responsible for monitoring the quality of the data for their own program(s), since that data may be used for reporting and/or monitoring purposes. Data may also be used to measure program efficacy, which impacts funding opportunities during competitive funding processes such as the annual Continuum of Care application to HUD.

**Procedure:** In order to test the integrity of the data contained in the VI HMIS, the VI HMIS System Administrator/HMIS Specialist will perform regular data integrity checks on the VI HMIS. Any patterns of error will be reported to the Agency Administrator. When patterns of error have been discovered, users will be required to make corrections where possible, correct data entry techniques, improve the accuracy of their data entry, and will be monitored for compliance.

In addition to data quality checks performed by the VI HMIS System Administrator/HMIS Specialist, each HUD-funded program is required to submit the HUD Annual Progress Report on a quarterly basis (based on the program's operating year) to the appropriate contract officer at COC. These reports will be assessed for data quality and errors will be reported to the VI HMIS System Administrator/HMIS Specialist and to the Agency Administrator. Other reports for non-HUD funded programs may also be required. COC reserves the right to add reporting requirements if data quality appears to be decreasing or if COC's reporting requirements change.

## **D.7. On-Site Review**

**Policy:** The COC and MTOC will perform annual reviews of each contracted Authorized Agency's procedures related to the VI HMIS as part of its regular monitoring.

**Explanation:** Regular reviews enable COC and MTOC to monitor compliance with the Policies and Standard Operating Procedures Manual and HMIS Agency Agreements.

**Procedure:** The exact procedures for on-site reviews will be determined by COC and MTOC on an annual basis.

## **D.8. Client Data Retrieval**

**Policy:** Any client may request to view, or obtain a printed copy of, his or her own records contained in the VI HMIS. No client shall have access to another client's records in the VI HMIS.

**Explanation:** The data in the VI HMIS is the personal information of the individual client. Each client has a right to know what information about him or her exists in the database. This information should be made available to clients within a reasonable time frame of the request.

**Procedure:** A client may ask his/her case manager or other agency staff to see his or her own record. The case manager, or any available staff person with VI HMIS access, will verify the client's identity and print all requested information. A log of all such requests and their outcomes should be kept on file in the client's record.

## **D.9. Public Data Retrieval**

**Policy:** The COC or System Administrator, MTOC will address all requests for data from entities other than Authorized Agencies or clients. No individual client data will be provided to any group or individual that is neither the Authorized Agency that entered the data or the client him or herself without proper authorization or consent. COC and System Administrator, MTOC, will provide aggregate reports for the larger community. The content of these reports will reflect a commitment to client confidentiality and ethical data use.

**Explanation:** Any requests for reports or information from an individual or group who has not been explicitly granted access to the VI HMIS will be directed to The COC. No individual client data will be provided to meet these requests without proper authorization or consent as stated in COC's Privacy Policy.

**Procedure:** All requests for data from anyone other than an Authorized Agency or a client will be directed to the System Administrator's (MTOC) Executive Director or her designee. As part of the mission to end homelessness in the US Virgin Islands, it is The COC's policy to provide aggregate data on homelessness and housing issues in this area. COC will also issue periodic public reports about homelessness and housing issues in the US Virgin Islands. No individually identifiable client data will be reported in any of these documents.

## **D.10. Data Retrieval Support**

**Policy:** Authorized Agencies will create and run agency-level reports.

**Explanation:** The Agency Administrator has the ability to create and execute reports on agency-wide data. This allows Authorized Agencies to customize reports and use them to support agency-level goals. The VI HMIS is a tool for the Authorized Agencies in managing programs and services.

**Procedure:** The Agency Administrator will be trained in the use of reporting tools by VI HMIS System Administrator/HMIS Specialist.

# Virgin Islands Housing Authority

## St. Thomas

#402 Anna's Retreat  
P.O Box 7668  
St. Thomas, VI 00801  
Telephone: 340-777-8442  
Fax: 340-775-0832  
TDD Line: 340-777-7725  
Email: [exec@vihousing.org](mailto:exec@vihousing.org)



## St. Croix

#5 Estate Bethlehem  
P.O Box 1349, Kingshill  
St. Croix, VI 00851  
Telephone: 340-778-8442  
Fax: 340-773-3054  
TDD Line: 340-778-5245  
Website: [www.vihousing.org](http://www.vihousing.org)

## PREFERENCE DEFINITION

### 1. Involuntary Displaced Preference

For families who are displaced due to a natural disaster that occurred in the twelve (12) months prior to receiving the preference, or through no fault of their own by government action or action by a private landlord and not living in standard, permanent replacement housing. **(Please note that applicants evicted for non-payment of rent will not be given this preference.)**

### 2. Substandard Preference

For families residing in a unit that is dilapidated; does not have electricity or has unsafe or inadequate electrical services; does not have a usable flush toilet or bathtub/shower inside the unit for the exclusive use of the family; or does not have a kitchen. **(Please note that applicants who do not have electricity due to unpaid electrical bills will not be given this preference. This preference will be verified by a site visit.)**

### 3. Employment Preference

For Families whose head, spouse, co-head or sole member can document that they are employed not fewer than 30 hours per week. This preference is also granted to elderly and disabled families.

### 4. Emergency Housing Preference

For Families who have an official referral from the Virgin Islands Housing Finance Authority's Emergency Housing Program.

### 5. No Preference

For Families who do not meet any of the preference criteria listed above.



# FY2016 - Performance Measurement Module (Sys PM)

## Summary Report for VI-500 - Virgin Islands 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 HMIS system.

	Universe (Persons)		Average LOT Homeless (bed nights)			Median LOT Homeless (bed nights)		
	Previous FY	Current FY	Previous FY	Current FY	Difference	Previous FY	Current FY	Difference
1.1 Persons in ES and SH	109	134	292	169	-123	144	70	-74
1.2 Persons in ES, SH, and TH	159	185	306	228	-78	147	91	-56

b. Due to changes in DS Element 3.17, metrics for measure (b) will not be reported in 2016.

This measure includes data from each client's "Length of Time on Street, in an Emergency Shelter, or Safe Haven" (Data Standards element 3.17) response and prepends this answer 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.

NOTE: Due to the data collection period for this year's submission, the calculations for this metric are based on the data element 3.17 that was active in HMIS from 10/1/2015 to 9/30/2016. This measure and the calculation in the SPM specifications will be updated to reflect data element 3.917 in time for next year's submission.

	Universe (Persons)		Average LOT Homeless (bed nights)			Median LOT Homeless (bed nights)		
	Previous FY	Current FY	Previous FY	Current FY	Difference	Previous FY	Current FY	Difference
1.1 Persons in ES and SH	-	134	-	180	-	-	72	-
1.2 Persons in ES, SH, and TH	-	189	-	262	-	-	101	-

## FY2016 - 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.

	Total # of Persons who Exited to a Permanent Housing Destination (2 Years Prior)	Returns to Homelessness in Less than 6 Months (0 - 180 days)		Returns to Homelessness from 6 to 12 Months (181 - 365 days)		Returns to Homelessness from 13 to 24 Months (366 - 730 days)		Number of Returns in 2 Years	
		# of Returns	% of Returns	# of Returns	% of Returns	# of Returns	% of Returns	# of Returns	% of Returns
Exit was from SO	0	0		0		0		0	
Exit was from ES	31	2	6%	0	0%	1	3%	3	10%
Exit was from TH	10	1	10%	0	0%	0	0%	1	10%
Exit was from SH	0	0		0		0		0	
Exit was from PH	10	0	0%	0	0%	0	0%	0	0%
<b>TOTAL Returns to Homelessness</b>	<b>51</b>	<b>3</b>	<b>6%</b>	<b>0</b>	<b>0%</b>	<b>1</b>	<b>2%</b>	<b>4</b>	<b>8%</b>

## FY2016 - Performance Measurement Module (Sys PM)

### Measure 3: Number of Homeless Persons

#### Metric 3.1 – Change in PIT Counts

This measures the change in PIT counts of sheltered and unsheltered homeless person as reported on the PIT (not from HMIS).

	2015 PIT Count	Most Recent PIT Count	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	337	341	4
Emergency Shelter Total	53	53	0
Safe Haven Total	0	0	0
Transitional Housing Total	32	36	4
Total Sheltered Count	85	89	4
Unsheltered Count	252	252	0

#### Metric 3.2 – Change in Annual Counts

This measures the change in annual counts of sheltered homeless persons in HMIS.

	Submitted FY 2015	Current FY	Difference
Universe: Unduplicated Total sheltered homeless persons	164	187	23
Emergency Shelter Total	113	136	23
Safe Haven Total	0	0	0
Transitional Housing Total	53	58	5

### 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

## FY2016 - Performance Measurement Module (Sys PM)

	Submitted FY 2015	Current FY	Difference
Universe: Number of adults (system stayers)	6	27	21
Number of adults with increased earned income	0	0	0
Percentage of adults who increased earned income	0%	0%	0%

### Metric 4.2 – Change in non-employment cash income for adult system stayers during the reporting period

	Submitted FY 2015	Current FY	Difference
Universe: Number of adults (system stayers)	6	27	21
Number of adults with increased non-employment cash income	0	0	0
Percentage of adults who increased non-employment cash income	0%	0%	0%

### Metric 4.3 – Change in total income for adult system stayers during the reporting period

	Submitted FY 2015	Current FY	Difference
Universe: Number of adults (system stayers)	6	27	21
Number of adults with increased total income	0	0	0
Percentage of adults who increased total income	0%	0%	0%

### Metric 4.4 – Change in earned income for adult system leavers

	Submitted FY 2015	Current FY	Difference
Universe: Number of adults who exited (system leavers)	19	28	9
Number of adults who exited with increased earned income	0	0	0
Percentage of adults who increased earned income	0%	0%	0%

### Metric 4.5 – Change in non-employment cash income for adult system leavers

	Submitted FY 2015	Current FY	Difference
Universe: Number of adults who exited (system leavers)	19	28	9
Number of adults who exited with increased non-employment cash income	1	3	2
Percentage of adults who increased non-employment cash income	5%	11%	5%

## FY2016 - Performance Measurement Module (Sys PM)

Metric 4.6 – Change in total income for adult system leavers

	Submitted FY 2015	Current FY	Difference
Universe: Number of adults who exited (system leavers)	19	28	9
Number of adults who exited with increased total income	1	3	2
Percentage of adults who increased total income	5%	11%	5%

### 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 2015	Current FY	Difference
Universe: Person with entries into ES, SH or TH during the reporting period.	104	134	30
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.	9	21	12
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)	95	113	18

Metric 5.2 – Change in the number of persons entering ES, SH, TH, and PH projects with no prior enrollments in HMIS

	Submitted FY 2015	Current FY	Difference
Universe: Person with entries into ES, SH, TH or PH during the reporting period.	159	173	14
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.	21	28	7
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.)	138	145	7

## **FY2016 - 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 2016.

## FY2016 - Performance Measurement Module (Sys PM)

### 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 2015	Current FY	Difference
Universe: Persons who exit Street Outreach	0	0	0
Of persons above, those who exited to temporary & some institutional destinations	0	0	0
Of the persons above, those who exited to permanent housing destinations	0	0	0
% Successful exits			

Metric 7b.1 – Change in exits to permanent housing destinations

	Submitted FY 2015	Current FY	Difference
Universe: Persons in ES, SH, TH and PH-RRH who exited	116	137	21
Of the persons above, those who exited to permanent housing destinations	59	69	10
% Successful exits	51%	50%	0%

Metric 7b.2 – Change in exit to or retention of permanent housing

	Submitted FY 2015	Current FY	Difference
Universe: Persons in all PH projects except PH-RRH	58	102	44
Of persons above, those who remained in applicable PH projects and those who exited to permanent housing destinations	56	92	36
% Successful exits/retention	97%	90%	-6%

## **FY2016 - SysPM Data Quality**

### **VI-500 - Virgin Islands 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 in 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.

## FY2016 - SysPM Data Quality

	All ES, SH				All TH				All PSH, OPH				All RRH				All Street Outreach			
	2012-2013	2013-2014	2014-2015	2015-2016	2012-2013	2013-2014	2014-2015	2015-2016	2012-2013	2013-2014	2014-2015	2015-2016	2012-2013	2013-2014	2014-2015	2015-2016	2012-2013	2013-2014	2014-2015	2015-2016
1. Number of non-DV Beds on HIC	65	59	52	56	40	34	33	39	59	22	35	68				7				
2. Number of HMIS Beds	65	44	37	43	27	26	25	39	59	12	25	68				7				
3. HMIS Participation Rate from HIC ( % )	100.00	74.58	71.15	76.79	67.50	76.47	75.76	100.00	100.00	54.55	71.43	100.00				100.00				
4. Unduplicated Persons Served (HMIS)	163	116	105	134	51	62	57	59	47	51	106	105	0	0	0	19	96	96	233	479
5. Total Leavers (HMIS)	115	85	71	102	23	40	37	31	36	17	32	20	0	0	0	18	5	10	3	4
6. Destination of Don't Know, Refused, or Missing (HMIS)	2	1	2	3	4	3	8	3	0	2	1	4	0	0	0	0	0	0	2	2
7. Destination Error Rate (%)	1.74	1.18	2.82	2.94	17.39	7.50	21.62	9.68	0.00	11.76	3.13	20.00				0.00	0.00	0.00	66.67	50.00

# V.I. CONTINUUM OF CARE



V.I. Housing Finance Authority, Collaborative Applicant

February 1, 2018

Mrs. Kendall Tutein  
Vice President  
The Village -Virgin Islands Partners in Recovery, Inc.  
P.O. Box 5105  
St. Croix, VI 00823-5105

Dear Mrs. Tutein:

The Virgin Islands Housing Finance Authority, in its role as the Collaborative Applicant, for the Virgin Islands Continuum of Care (VI CoC) acknowledges receipt of your organization's submission of an application for funding under the Permanent Supportive Housing bonus component of the FY 2017 CoC Grant.

As you may be aware, the CoC is required to conduct a formal review of the project applications submitted for compliance with eligibility requirements and rating factors; projects are then either accepted (i.e., approved) and ranked or rejected. In this process, the CoC appointed an evaluation team comprised of the Collaborative Applicant and two other representatives of CoC participating organizations.

Upon review by the evaluation team, your organization's application was accepted. As such, the application will be ranked and included among the projects submitted under the CoC Consolidated Application.

We applaud VIPIR's effort to apply for funding under the CoC Grant to administer a Permanent Supportive Housing Program which will provides housing and supportive services to three (3) chronically homeless adults on the island of St. Croix.

Should you have any questions about the application review process, please feel free to contact me at (340) 772-4432 or via e-mail at [jhector@vihfa.gov](mailto:jhector@vihfa.gov).

Sincerely,

  
Janine Hector  
Federal Programs Director, VIHFA

xc: Evaluation Team  
CoC File

# V.I. CONTINUUM OF CARE



V.I. Housing Finance Authority, Collaborative Applicant

February 1, 2018

Mrs. Louise O. Petersen  
Executive Director  
Methodist Training & Outreach Center, Inc. (MTOC)  
P.O. Box 306816  
St. Thomas, VI 00803

Dear Ms. Petersen:

The Virgin Islands Housing Finance Authority, in its role as the Collaborative Applicant, for the Virgin Islands Continuum of Care (VI CoC) acknowledges receipt of your organization's submission of an application for renewal grant funding under the FY 2017 CoC Grant.

As you may be aware, the CoC is required to conduct a formal review of the project applications submitted for compliance with eligibility requirements and rating factors; projects are then either accepted (i.e., approved) and ranked or rejected. In this process, the CoC appointed an evaluation team comprised of the Collaborative Applicant and two other representatives of CoC participating organizations.

Upon review by the evaluation team, your organization's application was accepted. As such, the application will be ranked and included among the projects submitted under the CoC Consolidated Application.

We applaud MTOC's effort to apply for funding under the CoC Grant to continue the administration and management of the Homeless Management Information System (HMIS) which is used to collect client-level data and derive reports on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. The analysis of HMIS data is increasingly critical to the receipt of funding under the both the ESG Program and the CoC Grant.

Should you have any questions about the application review process, please feel free to contact me at (340) 772-4432 or via e-mail at [jhector@vihfa.gov](mailto:jhector@vihfa.gov).

Sincerely,

  
Janine Hector  
Federal Programs Director, VIHFA

xc: Evaluation Team  
CoC File

# V.I. CONTINUUM OF CARE



V.I. Housing Finance Authority, Collaborative Applicant

February 1, 2018

Mrs. Brenda H. Walwyn  
Special Assistant to the Commissioner  
Department of Human Services  
Knud Hansen Complex Bldg. A  
1303 Hospital Ground  
St. Thomas, VI 00802

Dear Mrs. Walwyn:

The Virgin Islands Housing Finance Authority, in its role as the Collaborative Applicant, for the Virgin Islands Continuum of Care (VI CoC) acknowledges receipt of your organization's submission of an application for renewal grant funding under the FY 2017 CoC Grant.

As you may be aware, the CoC is required to conduct a formal review of the project applications submitted for compliance with eligibility requirements and rating factors; projects are then either accepted (i.e., approved) and ranked or rejected. In this process, the CoC appointed an evaluation team comprised of the Collaborative Applicant and two other representatives of CoC participating organizations.

Upon review by the evaluation team, your organization's application was accepted. As such, the application will be ranked and included among the projects submitted under the CoC Consolidated Application.

We applaud DHS' effort to apply for funding under the CoC Grant to continue the implementation of its Permanent Supportive Housing Program which provides housing and supportive services to chronically homeless adults on the island of St. Thomas.

Should you have any questions about the application review process, please feel free to contact me at (340) 772-4432 or via e-mail at [jhector@vihfa.gov](mailto:jhector@vihfa.gov).

Sincerely,

Janine Hector  
Federal Programs Director, VIHFA

xc: Evaluation Team  
CoC File

# V.I. CONTINUUM OF CARE



V.I. Housing Finance Authority, Collaborative Applicant

February 1, 2018

Mr. Louise O. Petersen  
President  
V.I. Continuum of Care  
P.O. Box 306816  
St. Thomas, VI 00803

Dear Ms. Petersen:

The Virgin Islands Housing Finance Authority, in its role as the Collaborative Applicant, for the Virgin Islands Continuum of Care (VI CoC) submitted an application on behalf of the CoC for Planning Grant funds under the FY 2017 CoC Grant.

As you may be aware, the CoC is required to conduct a formal review of the project applications submitted for compliance with eligibility requirements and rating factors; projects are then either accepted (i.e., approved) and ranked or rejected. Upon review by the evaluation team, the organization's Planning Grant application was accepted. As such, the application will be included among the projects submitted under the CoC Consolidated Application.

As the Collaborative Applicant, VIHFA is pleased to apply for funding under the CoC Grant to assist the CoC with critical planning efforts toward strengthening the organization's capacity and development of the Coordinated Entry System.

Should you have any questions about the application review process, please feel free to contact me at (340) 772-4432 or via e-mail at [jhector@vihfa.gov](mailto:jhector@vihfa.gov).

Sincerely,

Janine Hector  
Federal Programs Director, VIHFA

xc: Evaluation Team  
CoC File