

PASADENA PARTNERSHIP TO END HOMELESSNESS

[Governance Charter]

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[Introduction]

As the lead agency for the Pasadena Continuum of Care (CoC) CA-607, the Pasadena Partnership to End Homelessness (Pasadena Partnership) is dedicated to implementing evidence-based best practices throughout the City in order to prevent and end homelessness. This Governance Charter, which is updated annually, outlines the composition, governance structure, responsibilities, and regulations of the Pasadena Partnership for the purposes of achieving its mission.

NAME

The name of the organization is Pasadena Partnership to End Homelessness (hereinafter referred to as the “Pasadena Partnership”).

GEOGRAPHIC BOUNDARIES

The Pasadena Partnership is responsible for the area that the U.S. Department of Housing and Urban Development (HUD) has designated for CA-607 Pasadena City which is the boundaries of the City of Pasadena (hereinafter referred to as the “geographic area”).

PURPOSE

The Pasadena Partnership serves as the HUD-designated primary decision-making group whose primary purpose and scope is to implement the Continuum of Care program.

The program is designed to:

1. Promote community wide commitment to the goal of ending homelessness;
2. Provide funding for efforts by nonprofit providers, States, and local governments to quickly rehouse homeless individuals (including unaccompanied youth) and families, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;
3. Promote access to and effective utilization of mainstream programs by homeless individuals and families; and
4. Optimize self-sufficiency among individuals and families experiencing homelessness.

COLLABORATIVE APPLICANT

The Collaborative Applicant is the legal entity designated by the Continuum of Care to submit the CoC Program Grant application on behalf of the CoC. The Pasadena Partnership Collaborative Applicant will be the City of Pasadena. Guidelines for submission are detailed in the CoC Responsibilities section below.

MEETINGS

The Pasadena Partnership will conduct meetings of the full membership with published agendas at least four times a year. Meetings will be held at the principal office noted below unless otherwise noticed in advance.

PRINCIPAL OFFICE

The principal office of the Pasadena Partnership is located within the City of Pasadena Housing Department at 649 N. Fair Oaks Ave., 2nd Floor.

PROVISIONS TO AMEND GOVERNANCE CHARTER

This governance charter may be amended upon a two-thirds majority of all members present during a scheduled meeting.

[Membership]

The Pasadena Partnership is made stronger through the participation of broad and diverse Members. Therefore, membership is open to any individual or organization that embraces the mission, values and goals of the Pasadena Partnership. The Pasadena Partnership works to assure diverse input to deliberations and decision-making, including consumers and community members, as well as gender, ethnic, cultural and geographic representation.

Membership is defined as representatives from relevant organizations participating in the responsibilities of the Pasadena Partnership through active participation in its board, committees and working groups. All interested persons are encouraged to attend meetings, provide input, and voice concerns.

OPEN INVITATION

A public invitation within the geographic area for new members to join will be extended at least annually. Additional outreach includes community meetings, emails to Pasadena Partnership listservs and announcements on the Pasadena Partnership website to ensure participation from the following groups:

- Homeless service providers and agencies
- Victim service providers
- Homeless youth providers
- Faith-based organizations
- Local government representatives
- Key civic leaders
- Homeless and formerly homeless people
- Businesses
- Homeless advocates
- Public housing agencies
- School districts
- Social service providers
- Mental health agencies
- Hospitals
- Universities and academic institutions
- Affordable housing developers
- Law enforcement and corrections agencies
- Organizations that serve veterans and homeless and formerly homeless individuals
- Substance abuse recovery providers
- Employment service providers
- Mainstream resources

Membership is achieved through a request to be added to the Pasadena CoC and a commitment to actively participate in the responsibilities of the Pasadena CoC.

TERMS

There is no term limit. Membership, however, may be terminated by the Pasadena CoC in accordance with the guidelines below.

DECISION MAKING

A number equal to a majority of those serving on the Pasadena CoC will constitute a quorum for the transaction of business at any meeting. At all meetings, business items may be decided by arriving

at a consensus. If a vote is necessary, all votes will be by voice or ballot at the will of the majority in attendance. Each member agency will have one vote. One person may not represent more than one agency. No member may vote on any item which presents a real or perceived conflict-of-interest.

REMOVAL

Any member of the Pasadena CoC may be removed by a two-thirds majority of all members present during a scheduled meeting for repeated absence, disruptive behavior, misconduct, failure to participate, or violation of conflict of interest policies.

[Officers]

The officers of the Pasadena Partnership will be two (2) Co-Chairs and a Secretary. One Co-Chair will non-profit member organization or from a constituent group. The Secretary may be a representative from either a public or private agency.

Co-chairs are responsible for scheduling and setting the agenda for meetings. They will give all notices required by law or by this Governance Charter when necessary.

Secretary will keep accurate records of the acts and proceedings of all meetings including the names of those in attendance. The Secretary will have general charge of Pasadena Partnership records and will keep or cause to be kept all such records at the principal office of the Pasadena Partnership. The Secretary will chair meetings in the case of the absence of both Co-chairs.

NOMINATIONS

Nominations will be made by members of the Pasadena Partnership during the first regular meeting of a new calendar year.

ELECTION

Officers will be elected during the first regular meeting of a new calendar year.

TERM

Each officer will hold office for a term of one (1) year or until their successors have been elected and qualified. No person may hold more than one (1) office.

VACANCIES

Vacancies among the officers may be filled by a vote of the majority of Pasadena Partnership representatives at any meeting at which a quorum is present.

COMPENSATION

Officers will not be compensated for their services.

[Board]

The Pasadena Partnership Board is the primary decision making body for the Pasadena CoC. Board members determine the policy direction of the Pasadena Partnership and ensure that the CoC fulfills its responsibilities as assigned by the U.S. Department of Housing and Urban Development (HUD). Additionally, the board oversees and approves the work of Pasadena Partnership committees and workgroups.

COMPOSITION

The Pasadena Partnership will establish a board of at least five members to act on its behalf. The board will:

- Have a chair and co-chair
- Be representative of the relevant organizations and of projects serving homeless subpopulations;
- Include at least one homeless or formerly homeless individual;
- Include an individual from at least one Emergency Solutions Grants program (ESG) recipient agency; and
- Be composed of an uneven number

The board will not consist of representatives from subrecipient agencies that receive Continuum of Care Homeless Assistance or Emergency Solutions Grant (ESG) funding unless representatives from agencies that do not receive Continuum of Care Homeless Assistance or Emergency Solutions Grant (ESG) funding for one or more of the subpopulations listed above cannot be recruited as board members.

RESPONSIBILITIES

The Pasadena Partnership Board provides overall direction and leadership of the CoC process. Pasadena Partnership Board members will meet at least quarterly at a time agreed to by the membership. Members who fail to attend two (2) or more meetings during the course of the year without prior notification or discussion with the Chair may be removed from the Board. Members shall notify the Chair of their expected absence within 72 hours in advance of scheduled meetings.

Among its specified duties, the Pasadena Partnership Board is tasked with overseeing the Collaborative Application for the CoC, provide input into the planning, performance management, HMIS administration, and annual grant submission performed by the Pasadena Partnership. One of the Pasadena Partnership Board's primary responsibilities is the ranking and review of all new and renewal projects to be included in the CoC Application as well as making recommendations for reallocations. In this capacity, the Pasadena Partnership Board will hear and act on appeals from providers not in agreement with the recommendations for new, renewal, and reallocations during the CoC grant submittal process.

CHAIR AND CO-CHAIR RESPONSIBILITIES

The Chair governs and leads the Board of Directors, providing overall guidance at Board meetings. In the absence of the Chair, the Co-chair assumes the duties of the Chair. The Co-Chair is responsible for

scheduling meetings of the Pasadena Partnership Board, ensuring that the Board meets regularly or as needed, and for setting the agenda for these meetings. The Chair and Co-Chair are also responsible for reviewing any grievances towards the Pasadena Partnership or programs funded by the Pasadena Partnership.

NOMINATIONS

Nominations will be made by members of the Pasadena Partnership.

ELECTION

Pasadena Partnership Board members will be elected during the first regular meeting of a new calendar year. A Chair and a Vice Chair will be elected by the Pasadena Partnership Board. This process will be reviewed, updated, and approved by the Pasadena Partnership at least once every 5 years .

TERM

Pasadena Partnership Board members will serve a staggered term of three (3) years. Absent reappointment or a new appointment, Board Members shall continue to serve indefinitely following the end of their term. There shall be no limit on terms of service.

Immediately after this governance charter goes into effect half of the current Board members will be asked to voluntarily put themselves up for election during the calendar year. Newly elected Board members will start their terms in July 2015. The remaining Board members will stand for election the following year, and those newly elected Board members will start their terms in May 2016.

Board members may be terminated for reasonable cause. Reasonable cause includes, but is not limited to, the presence of a conflict of interest that cannot be mitigated or if attendance at meetings does not meet standards established by Pasadena Partnership.

VACANCIES

Vacancies among the board members may be filled by a vote of the majority of Pasadena Partnership Board representatives at any meeting at which a quorum is present.

MEETINGS

Meetings of the full Board with published agendas will occur at least four times a year. Meetings will be held at the principal office noted in Section VII below unless otherwise noticed in advance.

DECISION MAKING

A number equal to a majority of those serving on the Pasadena Partnership Board will constitute a quorum for the transaction of business at any meeting. At all meetings, business items may be decided by arriving at a consensus. If a vote is necessary, all votes will be by voice or ballot at the will of the majority in attendance. Each representative will have one vote. No member may vote on any item which presents a real or perceived conflict-of-interest.

[Committees]

The Pasadena Partnership will appoint committees, subcommittees, or working groups as the need arises. The purpose of these ad hoc committees and task forces will be to develop recommended solutions to the specific issue for which they were created. These committees may be comprised of members of the Pasadena Partnership and outside individuals with expertise in the subject matter. Committees will meet four times a year or more frequently depending on the tasks to be accomplished.

HOUSING COMMITTEE

The Housing Committee implements strategies that remove barriers and increase rehab and production of affordable housing (including permanent supportive housing) for homeless and at-risk households. In addition, this committee addresses gaps analysis in housing services and puts into practice strategies that promote housing first, homeless prevention, and rapid rehousing. Finally, the housing committee ensures homeless program compliance with fair housing including the needs of the LGBT population and tracks local, state, and national policies that influence and promote the activities noted above and makes recommendations to the Pasadena Partnership to support such policies.

HOMELESS PLANNING & RESEARCH COMMITTEE

The Homeless Planning & Research Committee improves CoC-wide participation in mainstream resources and programs, develops the CoC's centralized/coordinated assessment system, and implements strategies that provide a wide-range of social services. This committee also assists the City with the implementation of discharge planning and plans and improves CoC-wide participation in disaster planning.

HMIS & HOMELESS RESEARCH COMMITTEE

The HMIS and Homeless Research Committee is responsible for gathering data and providing analysis of research projects including homeless service and housing inventories, counts, and surveys. This committee also ensures the implementation of HMIS, including HMIS integration with homeless counts and surveys.

FAITH COMMUNITY COMMITTEE

The Faith Community Committee aims to facilitate faith-based agencies in their efforts to address homelessness in Pasadena. To this end, the Faith Community Committee researches and supports evidence-based and best practices to prevent and end homelessness in Pasadena and recruits representatives from other faith-based organization to participate in these efforts.

10-YEAR PLAN IMPLEMENTATION COMMITTEE

The 10-Year Plan Implementation Committee implements and evaluates the action steps outlined in the 10-Year Strategy to End Homelessness including the integration of the plan with other guiding elements such as the Consolidated Plan, Analysis of Impediments to Fair Housing Choice, and the Housing Element of the General Plan.

[CoC Responsibilities]

The Pasadena Partnership is the planning body that provides a forum for discussing plans to end homelessness in the CoC and measuring its effectiveness at meeting that goal. Responsibilities of the Pasadena Partnership are outlined below.

COORDINATED ENTRY SYSTEM

In consultation with recipients of Emergency Solutions Grants program funds within the geographic area, the Pasadena Partnership will operate a coordinated entry system (CES) that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. Details about this system can be found in Appendix D: Coordinated Entry System. Key elements of this system include the following:

Standardized Evaluation

As detailed in Appendix D, CES utilizes the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) as the common assessment tool to screen single individuals and families experiencing homelessness. The VI-SPDAT helps to determine an individual's level of vulnerability by collecting information on their history of homelessness, overall socialization and daily functions, and general wellbeing. General wellbeing includes any mental or physical ailments, substance abuse history, and prior physical abuse.

Prioritization of Clients to Receive Assistance

Pasadena Partnership's limited resources are directed first to individuals and families who are the most vulnerable or have the most severe service needs with the most appropriate referral. Less vulnerable individuals and families will be assisted as resources allow. As detailed in Appendix C, prioritization is in compliance with HUD Notice CPD-14-012.

Rental Assistance Standards

Finally, the CES will set standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance.

PERFORMANCE TARGETS AND EVALUATION

The Pasadena Partnership will consult the HUD CoC Program Grant guidelines, Emergency Solutions Grant guidelines, as well as grant recipients to establish performance targets appropriate for population and program type. The Pasadena Partnership will maintain and review HMIS, Annual Performance Reports, and other documentation as necessary to measure the Continuum of Care's progress in meeting HUD CoC Program Grant goals and objectives.

The Continuum of Care Board of Directors may establish additional performance measurement requirements as necessary to report progress on local goals and objectives. Collaborative Applicant staff will communicate with CoC Program Recipient Agencies throughout each program year to ensure that they are aware of expected performance measures required by HUD and the Continuum of Care Board of Directors.

Actions Against Poor Performance

CoC Program recipients who do not meet local and/or HUD performance targets and/or do not meet expectations and compliance of program and grant management of their CoC programs may be subject to having their projects reduced in whole or in part and reallocated to other projects during the renewal process as allowed in a HUD Notice of Funding Availability.

CONTINUUM OF CARE PLANNING

The Pasadena Partnership will coordinate and implement a housing and service system to meet the needs of the homeless population and sub-populations within its geographic area.

Key elements of Pasadena's plan are described below.

Systems Coordination

The Pasadena Partnership is responsible for coordinating and implementing a housing and service system that meets the needs of the homeless individuals (including unaccompanied youth) and families within its geographic area. At a minimum, this system will encompass the following:

- Outreach, engagement, and assessment;
- Shelter, housing, and supportive services; and
- Prevention strategies.

Point-in-Time Count

Consistent with HUD requirements, the Pasadena Partnership is responsible for planning for and conducting an annual point-in-time count of homeless persons within the geographic area that meets the following requirements:

- Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons;
- Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons; and
- Other requirements established by HUD by Notice.

Annual Gaps Analysis

The Pasadena Partnership is responsible for conducting an annual gaps analysis of the homeless needs and services available within the geographic area.

Consolidated Plan Information

The Pasadena Partnership is responsible for providing information required to complete the Consolidated Plan(s) within the Continuum's geographic area.

ESG Consultation

Emergency Solutions Grants program funds will be allocated, monitored, and evaluated in consultation with Pasadena Partnership (CoC) funds.

Discharge Planning

The Pasadena Partnership is responsible for coordinating resources and services with foster care agencies, health care institutions, mental health facilities, and correctional institutions as appropriate, in order to develop a discharge plan for persons exiting from state-operated or county supervised institutions.

In this capacity, the Pasadena Partnership will provide information to the agencies about housing options in order to assist the agency to develop a discharge plan. Housing options will include information about Housing Authorities, agencies that provide rental assistance, and as a last resort, shelter information.

Foster care agencies, health care and mental health care institutions, and law enforcement will be invited to attend Pasadena Partnership meetings to offer an opportunity to collaborate with other agencies about housing issues and/or lack of housing. In addition, the Pasadena Partnership will assist and/or support agencies when writing for grants specifically targeting funding for housing.

DESIGNATING AND OPERATING AN HMIS

The Pasadena Partnership is responsible for designating and operating an HMIS and an eligible applicant to manage the HMIS, known as the HMIS Lead, consistent with the requirements in the HEARTH Act. The HMIS Lead is designated by the Pasadena Partnership to carry out the day to day operations of the HMIS, including: reviewing, revising, and approving a privacy plan, security plan, and data quality plan for the HMIS; ensuring consistent participation of recipients and subrecipients in the HMIS; and ensuring the HMIS is administered in compliance with requirements prescribed by HUD.

HMIS Lead Agency Responsibilities

The HMIS Lead Agency which has the responsibility to establish, support, and manage HMIS in a manner that will meet HUD's standards for data quality, privacy, security, and other requirements for organizations participating in HMIS.

Responsibilities include:

- Overseeing the day-to-day administration of the HMIS system;
- Providing staffing for operation of HMIS;
- Providing technical support to participating agencies;
- Ensuring system integrity and availability;
- Providing training on software and related issues;
- Ensuring HMIS software is capable of producing required reporting including summary reports of un-duplicated client records;
- Ensuring participation in Annual Homeless Assessment Report (AHAR) and submission of usable data;
- Ensuring participation and reviews accuracy of data in the annual Housing Inventory Chart (HIC) and submission of usable data;
- Ensuring participation and reviews accuracy of data for the annual Point-in-Time (PIT) chart;
- Ensuring compliance with all applicable federal and state laws regarding protection of client privacy and confidentiality regulations;
- Ensuring Participation Agreements with each contributing HMIS organization and ensuring that each

HMIS user has signed a HMIS User Agreement;

- Ensuring and maintaining written agreements with participating agencies who share client level data that describes the level of data element or program information sharing among the data sharing HMIS agencies; and
- Providing information on HMIS agency performance for CoC annual ranking.

PREPARING AN APPLICATION FOR FUNDS

Each year the U.S. Department of Housing and Urban Development (HUD) releases a Notice of Funding Availability (NOFA) for the Continuum of Care (CoC) Program. The information in the NOFA identifies available funding and the procedures for the Pasadena Partnership (CoC) to apply for funds. Before the application is submitted to HUD, the Pasadena Partnership is required to hold a local competition to determine which projects will be included in the consolidated application, along with their relative priority. The results of the local competition dictate for which projects the Pasadena Partnership (CoC) will seek funding.

Consistent with HUD requirements, the Pasadena Partnership will include the following minimum components in its annual CoC Grant Application:

1. Design, operate, and follow a collaborative process for the development of applications and approve the submission of applications in response to a Notice of Funding Availability (NOFA) published by HUD;
2. Establish priorities for funding projects in the geographic area; and
3. Assign the Collaborative Applicant to collect and combine the required application information from all projects within the geographic area that the Continuum has selected for funding and apply for Continuum of Care planning activities

The Continuum retains all of its responsibilities, including approving the Continuum of Care application.

Components

The CoC Consolidated Application is made up of three parts:

1. **CoC Application:** Includes information about the CoC planning body, governance structure, overall performance, and the strategic planning process. This part of the application is scored and will determine the order in which CoCs are funded.
2. **Project Applications**
3. **CoC Priority Listing:** Ranks projects in order of priority and identifies any project applications rejected by the CoC

Ranking and Review Process

The Pasadena Partnership Board will review annual renewal projects, recommend reallocations, and consider new projects for the Continuum of Care Application. All new and renewal projects selected to be including in the CoC Collaborative Application will be ranked by the Pasadena Partnership Board based on HUD's priorities as articulated in the NOFA.

Renewal Applications

Any agency interested in applying for renewal funds will be required to complete a Letter of Intent (LOI) that must be submitted by the posted due date. Eligible proposals will be prioritized for inclusion in the CoC's Collaborative Application by the Pasadena Partnership Board using the LOI Ranking Tool (Appendix B). The Collaborative Applicant (City of Pasadena) will conduct on-site monitoring visits, review annual APRs submitted to HUD, and conduct threshold reviews that will aid the Board in its decision-making process.

Reallocation

The Pasadena Partnership actively encourages new and existing providers to apply for new projects through reallocation. Reallocated funds can be used to create new evidence-informed projects, eliminate underperforming projects, shift projects to other, more appropriate funding streams, ensure the Pasadena CoC inventory matches local need, and provide Coordinated Entry.

Decisions about reallocation are made on an ongoing basis and are based on a thorough analysis of needs and gaps in housing and services in the Pasadena CoC. This includes an annual review of HUD priorities, gaps analysis of homeless populations and types of housing and services available in the community, utilization rates, reviews of HMIS data including the PIT and HIC counts and data trends over time, annual monitoring and threshold review data of the current CoC and ESG funded programs, and prioritizing needs of subpopulation. More information about the reallocation process can be found in Appendix A: Reallocation Process for CoC Funding.

New Projects as a Result of Bonus, Reallocation, or Pro-Rata Availability

When the Pasadena Partnership (CoC) is able to request project applications from the community due to availability of funds through bonuses, pro-rata, or reallocation, the Pasadena Partnership will accept and consider proposals from all eligible applicants, as defined by the current year's NOFA, including organizations that have not previously received CoC Program Funding.

The Pasadena Partnership will post on its website and distribute to its membership a public notice requesting applications. The Pasadena Partnership's (CoC) priorities and details of eligible applications, as defined by the current year's NOFA, will be posted. The due date for submission to the Pasadena Partnership will be at least 30 days prior to the due date of the CoC Collaborative Application. If there is no availability of funds for new applications through bonuses, pro-rata, or reallocation, the Pasadena Partnership will post a public notice on its website that it is not accepting new applications for the current CoC Application.

[CoC Regulations]

CODE OF CONDUCT

The following Code of Conduct provides a foundation of ethics for the Pasadena CoC. The Pasadena CoC prohibits the solicitation and acceptance of gifts or gratuities (anything of monetary value) by officers, employees and agents for their personal benefit. Ask yourself if the gift would have been offered if you did not have your position. If the answer is “No” then you should decline accepting the gift.

- A. The Continuum promotes impartiality in performing official duties, and prohibits any activity representing a conflict of interest. You should not act on a matter if a reasonable person who knew the circumstances of the situation could legitimately question your fairness.
- B. The Continuum prohibits the misuse of position. You cannot use your position with the Continuum for your own personal gain or for the benefit of family or friends.
- C. Officers and employees shall put forth honest effort in the performance of their duties.
- D. Officers and employees shall not knowingly make unauthorized commitments or promises of any kind purporting to bind the Continuum without previous Board approval.
- E. Officers and employees shall disclose waste, fraud, abuse, and corruption to appropriate authorities.
- F. Officers and employees shall adhere to all laws and regulations that provide equal opportunity for all Americans regardless of race, color, religion, sex, national origin, age, or handicap.

Violation of this any portion of this code will be subject to disciplinary action which could include immediate termination. The code has been distributed to the Continuum’s Board of Directors, as well as posted on the Continuum’s website. A link to the code has also been distributed to the Continuum’s partner agencies.

CONFLICT OF INTEREST AND RECUSAL POLICY

Members must comply with the conflict of interest and recusal process of the HEARTH Act (§578.95). Pasadena CoC members with actual or perceived conflicts of interest must identify them as they arise. Individuals with a conflict of interest may participate in all discussion but shall recuse themselves from voting on any issue in which they may have a conflict. No member of the CoC Board shall vote upon any matter which shall have a direct financial bearing on the organization that the member represents or sits as a board member on the organization. This includes all decisions with respect to funding, awarding contracts, and implementing corrective actions as a result from monitoring activities of CoC and ESG activities.

[Administering Assistance]

WRITTEN STANDARDS FOR ASSISTANCE

The Pasadena Partnership has established and will follow written standards for providing assistance under the CoC and ESG program. These standards will address the following:

- Policies for prioritizing eligible households for the receipt of assistance (Appendix E: Coordinated Entry System (CES) Written Standards)
- Evaluation of eligibility of street outreach (Appendix E), transitional housing (Appendix F), rapid re-housing (Appendix G), and permanent supportive housing (Appendix H) assistance

SUBRECIPIENT CERTIFICATIONS

CoC subrecipient organizations certify assurances concerning:

- **Confidentiality Regarding Domestic Violence.** Subrecipients will maintain the confidentiality of records pertaining to any individual or family that was provided family violence prevention or treatment services through the project. In addition, subrecipients must maintain confidentiality of the addresses or locations of family violence projects, except with written authorization of the person responsible for such project.
- **Access to Education and Related Services.** Subrecipients will establish policies and practices that are consistent with, and do not restrict, the exercise of the rights provided by subtitle B of title VII of the Act and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness. If the subrecipient provides housing or services to families, it will designate a staff person to be responsible for ensuring that children served in the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Startm part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of title VII of the Act.
- **No Debarment.** Subrecipients agencies, their officers, and employees must not be debarred or suspended from doing business with the federal government.
- **Provision of Information to HUD.** Subrecipients must agree to provide information, such as data and reports, as required by HUD.

GRIEVANCE POLICY

It is the policy of the Pasadena Partnership to End Homelessness (Pasadena CoC) to provide its members with a fair and efficient process to present and resolve complaints and grievances. In the case of complaints about programs, it must be clear that the Pasadena CoC is not an official oversight entity but does have considerable influence.

Each HUD funded organization shall have a grievance procedure and shall implement the procedure when applicable.

Written Complaints About the Pasadena CoC

The Pasadena CoC Board will review any written complaint against the Pasadena CoC within ten (10) days of its receipt. The Chair or the Co-Chair will respond within 30 days by:

- Assisting the complainant in articulating/identifying issues, if needed
- Determining what action needs to be taken, if any
- Responding in writing to complainant with clear identification of issue and specifics about its resolution

Complaints About a Program Receiving HUD Funds

A first-person written and/or documented complaint will be considered a grievance. A verbal, second-hand or hearsay complaint will be considered a complaint. The person making the grievance or complaint will be asked if they have adhered to grievance procedures provided by the organization they are making the grievance or complaint about.

If the person making the grievance or complaint has not gone through the grievance procedure provided by the organization, the Pasadena CoC will recommend that the person do so and document that recommendation.

If the resolution provided by that organization was not satisfactory to the complainant, he/she may put the grievance or complaint in writing and submit it to the Chair of the Pasadena CoC. If there is a conflict apparent with reporting problems to the Chair, reports can be made to the Co-Chair. If the complainant does not want his/her name attached to the complaint, his/her anonymity will be protected. If the complainant is unwilling to put the concern in writing, the Chair or another Pasadena CoC member will document what has been said.

Each situation will be treated seriously and with sensitivity, and will be documented for the record with date, time, program name, and nature of the complaint, as well as with any action taken towards resolution. All complaints or grievances involving vulnerable adults or children will be immediately turned over to the appropriate authorities.

Once a complaint or grievance has been submitted, the Chair or Co-Chair will approach the problem program's representative, explain the complaint or grievance, and ask for a response to the charge(s). Responses will be documented. It will be up to the Chair or the Co-Chair to decide if the matter needs to be discussed by the Pasadena CoC Board.

If a program received three complaints, the Pasadena CoC Board will review the situation and recommend action. The Executive Director of the program being reviewed will be asked to respond to the Pasadena CoC Board.

Complaints about a Homeless Program Not Involved in or Funded by the CoC

Any complaints received against programs that are components of the Pasadena CoC but not participants in the process will be recorded. Information will be shared with the Pasadena CoC Board and/or funders or other stakeholders if and when deemed appropriate. All complaints or grievances involving vulnerable adults or children will be immediately turned over to the appropriate authorities.