

**FL-515 CONTINUUM OF CARE**  
**BAY, CALHOUN, GULF, HOLMES, JACKSON & WASHINGTON COUNTIES**  
**GOVERNANCE CHARTER**

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## **I. INTRODUCTION AND PURPOSE**

The U.S. Department of Housing and Urban Development (HUD) requires communities that receive funds under the Continuum of Care Program (“CoC Program”) to carry out the responsibilities listed in the CoC Program Interim Rule located at [24 CFR Part 578](#) in the code of federal regulations. The Interim Rule defines a CoC as “the group organized to carry out the responsibilities under this part and that is composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.” The interim rule also establishes three major duties for which the CoC is responsible: to operate the CoC, to designate a Homeless Management Information System (HMIS) for the CoC, and to plan for the CoC. HUD has designated the FL-515 CoC as the CoC covering the geographic region of Bay, Calhoun, Gulf, Holmes, Jackson, and Washington counties.

This Governance Charter serves as a comprehensive guide, detailing how the FL-515 CoC fulfills its responsibilities through a structure that is responsive to the local needs of people experiencing homelessness. The Charter outlines how stakeholders will govern the collective impact initiative to end homelessness, meet federally defined responsibilities of operating a HUD Continuum of Care as found in the CoC Program Interim Rule, direct the work of the CoC Lead Agency, and promote partnership and accountability among the various leadership bodies.

Appendix B provides a comprehensive listing of leadership bodies' roles and responsibilities. The Governance Charter, a cornerstone of our collective effort, will be reviewed annually and adopted by the CoC membership. This commitment to regular review and improvement ensures that our initiative to end homelessness remains responsive and effective.

## **II. MISSION AND GUIDING PRINCIPLES**

The FL-515 CoC envisions a Housing Crisis Response System that effectively prevents and ends homelessness by quickly connecting those in need of homelessness and housing supports with programming tailored to solve their episode of homelessness and prevent returns to homelessness by sustaining permanent housing opportunities. The CoC works as a collective body to ensure everyone has a safe, stable, and affordable place to live. The CoC holds each other accountable by committing to guiding principles.

All relevant organizations and individuals participating in the CoC uphold the following collective attributes and values;

- **Solution-Focused:** The CoC engages in solution-focused conversations and decision-making to address limited resources, systemic challenges, and ever-changing needs.
- **Geographically Diverse:** The CoC includes diverse representation among its membership from Bay, Calhoun, Gulf, Holmes, Jackson, and Washington counties in Northwest Florida.
- **Collaborative:** Including fellowship and networking among all citizens, organizations and systems that intersect with housing and homelessness.
- **Engaged and Committed:** CoC members' engagement and commitment is evidenced by active participation in meetings, committees, work groups, and volunteerism.
- **Value the voices of the CoC membership:** Robust representation of all subpopulations (e.g., veterans, unsheltered, disabling conditions, etc.) is critical to informed decision-making, as well as people with lived experience are meaningfully and intentionally included in the decision-making structure and discussions.
- **Data-Driven:** The CoC prioritizes the collection and use of data to guide decisions in program, funding, policy and system design changes to implement active solutions that prevent and end homelessness.
- **Objective Decision-making:** Decision-making includes a wide range of members representing various sectors. The CoC will ensure that decisions consider the entire system's response instead of reflecting any special interests. Members will be heard and listened to regarding proposed system changes to ensure perspectives are shared and understood.

### III. STRUCTURE

The FL-515 CoC utilizes five main entities to carry out the work of the CoC as outlined in the CoC Program Interim Rule.

#### 3.1 COC MEMBERSHIP

The CoC membership is a collaborative network of organizations and stakeholders working together to address homelessness within the six-county coverage area of North Florida. CoC members develop and implement strategies to prevent and end homelessness.

#### 3.2 LEADERSHIP COUNCIL

The Leadership Council is the CoC's governance board and a formal decision-making body responsible for overseeing and guiding its direction. It is crucial to the CoC's structure, providing leadership, strategic direction, and accountability to ensure effective coordination and delivery of services to prevent and end homelessness.

#### 3.3 LEAD AGENCY (COLLABORATIVE APPLICANT)

The CoC Lead Agency is the administrative arm of the CoC. It is the primary organization responsible for planning, managing, and coordinating the CoC's activities. The Lead Agency plays a central role in ensuring that the CoC operates effectively and efficiently in its mission to prevent

and end homelessness. As the collaborative applicant for the CoC, the Lead Agency manages the application process for HUD CoC Program funding and other federal, state, and local funding sources. This includes preparing and submitting the annual CoC funding application to HUD.

### **3.4 HMIS LEAD**

The Homeless Management Information System (HMIS) Lead is the entity responsible for the administration and management of the CoC's HMIS. The HMIS is a locally administered, electronic data collection system that stores longitudinal client-level information about individuals and families who access homeless services. The role of the HMIS Lead is crucial for ensuring data quality, security, and compliance with federal, state, and local requirements.

### **3.5 COMMITTEES AND WORKGROUPS**

Committees and workgroups are vital to a comprehensive and collaborative community approach to address homelessness and carrying out the strategic actions necessary for the CoC to be effective. Committees and workgroups offer the opportunity for CoC members to engage by bringing their expertise, innovative solutions, and unique insights and experience. The committees and workgroups also provide valuable input and recommendations to the Leadership Council.

## **IV. COC MEMBERSHIP**

CoC general membership is open to any individual or organization committed to preventing and ending homelessness. Individuals or organizations must live, work, or serve residents inside the CoC's geographic area of Bay, Calhoun, Gulf, Holmes, Jackson, and Washington counties. This includes public and private entities, individuals with lived experience, community advocates, for-profits and nonprofits, and governmental entities.

### **4.1 TYPES OF MEMBERSHIP**

CoC general membership is open to any individual or organization living, working, or serving residents inside the CoC's geographic area of Bay, Calhoun, Gulf, Holmes, Jackson, and Washington counties. This includes public and private entities, for-profits and nonprofits, and governmental entities.

The CoC believes that including people with lived experience of homelessness in the general membership makes the CoC's work more relevant, responsive, and effective. All people with lived experience are invited to be members of the CoC and are afforded all the benefits of CoC membership.

There are two types of CoC membership: Organization and Individual.

- **Organization**

To become a member of the CoC, the agency/organization must be located or provide services in the CoC's geographical area, have attended at least one CoC membership meeting, and complete a membership application, including an updated conflict of interest disclosure. Organizations include faith-based organizations, nonprofits, government partners, and for-profit partners. Each application will be reviewed and confirmed by the CoC Lead Agency. The CoC Lead Agency will make the roster available to the Leadership Council. At the time of membership application, the organization will select one primary voting member and one alternate if they are unable to vote. Both the primary voting member and the alternate need to have completed the conflict of interest disclosure form at least annually and upon any change in affiliation. If the voting member is unable to be routinely involved in the CoC, the organization should provide the CoC Lead Agency with a new voting member. Organizations may update their voting member or alternate at any time by notifying the CoC Lead Agency. If the individual completing the application on behalf of the organization is not an executive leader or owner of the organization, the CoC Lead Agency will confirm with the organization's leadership (e.g., CEO, Board, or Owner) that it approves the voting member listed on the application. This includes individuals signing up to represent membership associations or affiliates, which may not fall under a typical organizational structure.

- **Individual**

To become an individual member of the CoC, the individual must live or work in the CoC's geographical area, have attended at least one CoC membership meeting, and complete a membership application, inclusive of a completed conflict of interest disclosure form.

There are two types of individual membership: voting and non-voting.

Individual Voting Member: A voting member is an individual who is not currently working for or representing an organization that is currently a CoC member. An individual voting member has one vote.

Individual Non-Voting Member: A non-voting member is an individual who wishes to participate as a member of the CoC but cannot cast a vote because they work for or represent an organization that is currently a CoC organizational member.

Beginning July 1, 2027, the CoC may charge annual membership fees to offset the cost of administering membership and membership meetings, and support strategic initiatives directed by the CoC Leadership Council. Fees are subject to change by Leadership Council vote. Fee amounts will be listed on the membership application.

Fees shall not interfere with any individual or organization's ability to participate in membership. Any individual or organization can request a fee waiver on their application. Requests for fee waivers are need-based and will be considered by the CoC Lead Agency, Leadership Council, or their designated committee. People currently experiencing homelessness and/or financial hardship will not be charged an individual membership fee.

### **Membership Benefits**

The following membership benefits apply to CoC members in good standing:

#### **Organizational Members:**

- Eligible members can apply for CoC funding, including participation in HUD Notice of Funding Opportunities specific to the CoC Program and any Requests for Proposals issued by the collaborative applicant/lead agency.
- Members may request letters of support necessary for their grant applications from the collaborative applicant. Requests do not guarantee automatic acceptance.
- Eligible voting members may participate in voting as outlined in Section 4.5.
- Members receive up-to-date information from the CoC on meetings, events, volunteer opportunities, CoC-wide training, and funding opportunities.
- Members may participate in CoC committees.
- Members may participate in CoC-provided training.
- Members actively guide the community's strategic plan to prevent and end homelessness.

#### **Individual Members:**

- Eligible voting members may participate in voting as outlined in Section 4.5.
- Members receive up-to-date information from the CoC on meetings, events, volunteer opportunities, CoC-wide training, and funding opportunities.
- Members may participate in CoC committees.
- Members may participate in CoC-provided training.
- Members actively guide the community's strategic plan to prevent and end homelessness.

### **Membership Denial**

While the CoC strives to be inclusive, there may be instances when membership is denied. The Leadership Council will address membership denials. Incomplete membership applications that do not include an updated conflict of interest disclosure form for the voting member will be denied.

**Resignation.** Any CoC member may withdraw their membership at any time by giving written notice to the CoC Lead Agency.

**Removal and Denial.** CoC membership applications may be denied or a current CoC member removed from the CoC membership for violations of the policies and procedures of this CoC, or cause, including but not limited to:

- Fraud
- Failure to disclose a conflict of interest
- Intentionally providing false information on the membership application
- Failure to maintain good standing as a CoC member
- Failure to maintain confidentiality
- Failure to uphold the guiding principles of the CoC

The Leadership Council will be responsible for developing, maintaining, and enforcing the procedures for resignation, removal, and denial.

#### **4.2 COC MEMBERSHIP ROLES AND RESPONSIBILITIES**

The Governance Charter assigns the following roles and responsibilities to the Continuum of Care Membership:

1. Hold a minimum of two meetings per year of the full membership, one of which will be the Annual Meeting.
2. Extend an open public invitation for new members to join. Ensure that an updated membership roster is maintained.
3. Adopt and follow the written process for selecting elected members to the Leadership Council.
4. Hold annual elections to fill vacant seats on the Leadership Council.
5. Update the Leadership Council selection policies no less than every five years.
6. Ratify the initial Governance Charter and approve the annual updates as developed and recommended by the Leadership Council or their designated committee.
7. Contribute input and strategic ideas to the Leadership Council and participate in CoC committees and workgroups.
8. Utilize the Governance Charter to delegate certain responsibilities of the CoC to the Collaborative Applicant, HMIS Lead, Leadership Council, and CoC committees/workgroups to meet the requirements of operating a CoC, operating an HMIS, and CoC planning.

#### **4.3 COC MEMBERSHIP RECRUITMENT AND OUTREACH**

The CoC invites new members to join at any time during the year. The CoC will publish and appropriately disseminate an open invitation broadly available through public notice at least annually for persons within the CoC geographic area to join as new CoC general members. The CoC will document recruitment efforts. Interested individuals and organizations can apply for membership by completing the application available at all in-person membership meetings. To ensure robust outreach and recruitment of people most impacted by homelessness, membership application information will be made available at each membership meeting and intentionally advertised at locations where people experiencing homelessness are receiving services.

The CoC will identify and address membership gaps in essential sectors from key providers or other vital stakeholders. The CoC will recruit members to ensure that it meets all membership requirements set forth in this governance charter, including representation of certain

populations and certain organizations. The CoC strives for a diverse body of members. In alignment with 24 CFR Part 578.5, the CoC will continue outreach to recruit new members that include people experiencing homelessness, formerly homeless or at risk of homelessness, nonprofit homeless assistance providers (whether or not recipients of HUD funding), employment providers, domestic violence and sexual assault service providers, faith-based organizations, governments, funders, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, substance use service providers, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans, and individual community members.

#### **4.4 COC MEMBERSHIP MEETINGS**

CoC General Membership meetings shall be held at least twice a year, with one meeting specified as the CoC Annual Meeting at which Leadership Council elections will be held. CoC General Membership Meetings are in addition to ad hoc workgroup meetings and committee meetings, which may occur more frequently.

CoC General Membership meetings are open to any interested party regardless of membership status. Meetings will be noticed in advance through the CoC membership list and through posting on the website of the CoC Lead Agency/Collaborative Applicant. This notice will include the meeting's date, time, and location. Meeting agendas will be posted online at a specified location and emailed to members at least two weeks in advance. In addition, public notice will be provided for the annual CoC membership meeting at which Leadership Council members are elected. Should the State of Florida Sunshine Law requirements be deemed relevant to any meeting, the CoC and Leadership Council will comply with the requirements of the Sunshine Law.

All CoC membership meetings are open to the public, whether or not membership has been established.

#### **4.5 VOTING, QUORUM, AND GOOD STANDING**

To the greatest extent possible, those items that need to be voted on will be indicated as such on the meeting's agenda and shared at least two weeks in advance of the meeting. The Lead Agency will administer and maintain records associated with CoC membership votes. Membership must be established and approved two weeks before voting. Each eligible voting member, in good standing, is permitted one vote, whether an organization or an individual. No person at the CoC membership meeting may vote twice as an organizational representative and an individual member. Only eligible voting members, in good standing, are permitted to vote. Other individuals or organizations in attendance may not cast a vote if membership has not been approved.

To be considered an active member in good standing, who is eligible to vote, the member must meet these thresholds:

1. Participation by the voting member or designated alternate in at least 75% of CoC General Membership meetings. For organizational members, only the voting member or alternate

that has been established in advance on the membership application is counted to determine good standing.

2. Membership fees must be paid according to the fee schedule and current two weeks before the meeting.
3. Members of an HMIS-covered homeless organization or comparable database must participate in data collection in compliance with the Data Quality Monitoring Plan for the CoC.

There may be times when active members are unable to meet the thresholds listed above. Prior to an active member losing their good standing, the Leadership Council or their designated committee will determine the extenuating circumstances on a case-by-case basis.

### **Proxies**

Organizational members are encouraged to designate an alternate voting member at the time of their application for membership. No additional proxy is allowed for organizational members. Organizations may update their alternate voting member following the process outlined in Section 4.1. Proxies for Individual Members are prohibited.

### **Quorum**

A quorum is defined as fifty percent of members present for in-person CoC membership meetings. If a quorum can be established, a majority of all those present and eligible to vote is necessary for any resolution or vote to pass. In the absence of a quorum, in-person voting will be deferred to the electronic voting process described herein. On a case-by-case basis, the Leadership Council may determine that a resolution needs a higher percentage of votes because of the substantial impact of the resolution. The membership will be notified according to the regular notification process if this is the case.

An email vote may be used for time-sensitive or critical votes. At the direction of the Leadership Council, electronic votes may be initiated by the Lead Agency. A quorum shall be reached for electronic voting when votes have been received from at least fifty percent of active voting members. Electronic voting will be closed at a predetermined deadline after reaching a quorum. Upon closure of voting, a simple majority of votes received in favor of a given voting item will constitute passage of that item.

Full membership votes shall be taken for items including, but not limited to, the following:

- Annual vote to ratify the updated CoC Governance Charter
- Periodic votes to elect Leadership Council members

Adopt and follow a written process to select a board to act on behalf of the CoC. The process must be reviewed, updated, and approved by the membership at least once every 5 years.

All voting members shall have the right to recuse themselves from voting on the matter without providing an excuse. A member must recuse themselves from voting when a conflict of interest arises. For example, a voting member, whether an individual or organization, may not take part

in votes where that individual or organization would potentially benefit from the decision, financially or otherwise.

## **V. LEADERSHIP COUNCIL**

The Leadership Council serves as a strategic governing body at the behest of the general membership, ensuring that the CoC is fulfilling its responsibilities and working collectively to prevent and end homelessness. The Leadership Council is designated as the CoC Governance Board as outlined in 24 CFR Part 578.

### **5.1 QUALIFICATIONS AND RESPONSIBILITIES**

All members of the CoC Leadership Council shall affirm a professional interest in and personal commitment to preventing and ending homelessness within the geographic region of FL-515.

Each Leadership Council Member must also:

1. Be a CoC member in good standing or be affiliated with an organizational member in good standing.
2. Complete and sign a code of conduct and conflict-of-interest disclosure statement each year and upon any change in affiliation.
3. Collaborate in good faith with other members to work toward the CoC mission to address homelessness.
4. Abide by the Governance Charter, policies, and procedures.
5. Serve actively on at least one committee per year.
6. If representing a certain sector of homeless services, solicit input from others in that sector who are not on the Council to ensure their voices are represented.
7. Attend and participate actively in Leadership Council, CoC Membership, and committee meetings.
8. Participate in the CoC's activities, such as the Point-in-Time Count, strategic planning, advocacy and public education efforts, and project and system performance reviews.

The Leadership Council will:

1. Set overall strategic direction and priorities for homelessness response, including overseeing and approving the allocation of CoC funds to align with these priorities.
2. Determine desired outcomes for people experiencing homelessness, with specific performance measures and benchmarks that consider the needs of subpopulations. Establish ongoing monitoring and oversight consistent with funder guidelines.
3. Review the CoC's system performance measures and develop strategies to improve performance.
4. Expand partnerships across industries to address homelessness in the CoC effectively, including local government coordination in planning and leveraging funding.
5. Partner with local government to promote and align community-wide efforts and solutions to address homelessness.

6. Broadly articulate the CoC's strategic plan and collaborative efforts to raise awareness and increase strategic collaboration.
7. Revise the Governance Charter as needed and present it annually to the CoC full membership.
8. Set strategic priorities for funding, review performance by funded agencies, and track the impact of funds spent. Funding streams include:
  - a. HUD CoC Program Funding
  - b. State of Florida homeless grants through DCF (TANF, ESG, Challenge, and Staffing)
  - c. Other outside funding sources meant to go directly to CoC activities and programs
9. Provide oversight to ensure the Collaborative Applicant/Lead Agency and funded agencies are applying for available funding through HUD's annual Notice of Funding Opportunity (NOFO) for CoCs, State of Florida homeless grants, and other special or local funding opportunities that align with the CoC's strategic plan.
10. Provide high-level oversight of the other CoC bodies, including the membership, Collaborative Applicant/Lead Agency, HMIS Lead, and committees and workgroups.
11. Designate entities to operationalize CoC responsibilities, including but not limited to the Collaborative Applicant (i.e., Lead Agency), HMIS Lead, and committees and workgroups.
12. Review the performance of the designated entities annually based on the roles and responsibilities outlined in this Charter and established MoUs.

## 5.2 COMPOSITION

The Leadership Council will consist of no fewer than 9 members and no more than 26 members who collectively represent the CoC membership. The Leadership Council will include diverse representation from community members and sectors, including, but not limited to, individuals with lived experience of homelessness, service providers, the business community, funders, faith communities, housing providers, and representatives of government.

Because the Leadership Council serves at the behest of the CoC Membership, the majority of Leadership Council members will be elected by the full membership at the Annual meeting. In addition to elected members, certain members will be appointed.

There are two types of Leadership Council members:

1. Appointed members serve on the Council by virtue of their employment.
2. Elected members must be voted in by the full CoC membership.

Appointed and elected members have equal participation, voting, and decision-making responsibilities. All Leadership Council members are eligible to vote at Leadership Council meetings, even if they are not their organization's designated voting CoC member.

APPOINTED MEMBERS (2)		
Representing	Seats	Type
Lead Agency Executive Director	1	Appointed, Ex-officio (non-voting)
Federally Qualified Health Center	1	Appointed

<b>ELECTED MEMBERS (No more than 24)</b>		
<b>Representing</b>	<b>Seats</b>	<b>Type</b>
Bay County Elected Public Official	1	Elected
Jackson County Elected Public Official	1	Elected
Gulf/Calhoun County Elected Public Official	1	Elected
Holmes/Washington County Elected Public Official	1	Elected
Person with Lived Experience	1	Elected
Affordable Housing Developer/Provider	1	Elected
Behavioral Health Provider	1	Elected
Healthcare System or Provider	1	Elected
Homeless Service Provider	3	Elected
Law Enforcement	2	Elected
Public Housing Authority	1	Elected
Organization Specific to Serving or Representing Persons with Disabilities	1	Elected
School System/Liaison	1	Elected
Workforce Development	1	Elected
Victim Service Provider	1	Elected
Faith-Based Community	1	Elected
Business Community	1	Elected
Veteran Service Provider	1	Elected
General Seats*	3	Elected

*\*General seats are open to any relevant individual or organization, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.*

### **Change in Employment**

To ensure full representation of a broad range of community organizations and specific populations, Leadership Council members are required to inform the Chair and Lead Agency Executive Director within ten business days if they no longer work for the organization they represent or if their work circumstances are significantly altered. Notification shall be made in writing. The Leadership Council or its designated committee will then initiate the nominating process according to Section 5.3.

### 5.3 NOMINATIONS

Members in good standing may apply to become a Leadership Council member by submitting an application to the Nominating Committee. The designated committee presents the eligible applicants to the membership. Elected Leadership Council seats can only be filled by a general membership vote.

#### **Seating the Leadership Council under the 1<sup>st</sup> Year of this Structure**

In December 2025, the CoC membership will vote to adopt this charter. In early 2026 a Nominating Committee will be formed to develop and implement the process for applying to and being selected to fill the designated Leadership Council seats. It is ideal that the new Nominating Committee have at least 2 to 3 members who also served on the Governance Committee that drafted this charter in 2025 for continuity of process and intention. In order for the newly established Leadership Council to conduct business, at least 30% (9 seats) of the combined elected and appointed seats must be filled.

### 5.4 TERMS

Terms shall be two (2) years. **Elected members** may serve no more than three consecutive terms, not to exceed six (6) years. Elected members are eligible to serve again after two years. **Appointed members** may continue to serve subsequent terms without limitation, except that they must continue to hold their position or office at the time of their appointment.

Initial appointments and elections will be staggered to include some three (3) year terms to ensure continuous quorum. Elected members serving an initial three-year term will only be eligible to serve one subsequent two-year term.

### 5.5 OFFICERS

The Leadership Council's elected officers shall be the Chair, Vice Chair, and Secretary. The officers may not be affiliated with a CoC-funded organization at any time. Officers shall be nominated by the Leadership Council or its designated committee, and elected by a majority vote of the Leadership Council members who are present and voting.

#### **Terms**

Officers of the Leadership Council shall serve a term of only two (2) years. The term of office shall begin on the date of the election. Officers may be existing or new Leadership Council members.

#### **Duties of Officers**

##### Leadership Council Chair

The Leadership Council Chair shall preside at all Leadership Council meetings, represent the Leadership Council and CoC in public capacities, and work with the Lead Agency to develop the meeting agendas.

##### Leadership Council Vice Chair

The Leadership Council Vice Chair shall fulfill the functions of the Chair when the Chair is unavailable.

#### **Leadership Council Secretary**

The Leadership Council Secretary shall keep accurate records of the proceedings of all CoC Board meetings or designate another person to do so at each meeting. Such records will include the names of those in attendance and minutes.

### **5.6 LEADERSHIP COUNCIL VOTING, QUORUM, AND GOOD STANDING**

Leadership Council meetings will happen approximately monthly and no fewer than six (6) times per year. Only Council members or a proxy designated by the Council member may vote at a Council meeting. The Collaborative Applicant will provide public notice of meeting times and locations. Except for Executive Committee meetings, all Leadership Council meetings are open to the public.

#### **Voting and Quorum**

A quorum is established when at least 50% +1 of Council members are in attendance. Meetings will be held in person, and a virtual option will be available.

#### **Good Standing**

Leadership Council members are expected to attend 75% of the Leadership Council meetings annually, except with an excused “good cause” absence approved by the Chair. Council members shall notify the Chair in advance of known absences. Missing three consecutive meetings is considered cause for removal.

#### **Resignation and Removal**

Resignation. Any member may resign at any time by giving written notice to the Chair. Any such resignations shall take effect at the time specified within the written notice.

Removal. Council members may be dismissed from the Leadership Council for violations of the code of conduct and/or conflict of interest policy, other violations of the policies and procedures of this CoC, or cause, including but not limited to:

- Missing three or more consecutive Council meetings
- Fraud
- Failure to maintain good standing as a CoC member
- Failure to maintain confidentiality
- Failure to uphold the guiding principles of the CoC

When any of these reasons for removal occur, the following processes will be used for removal.

Appointed Seats. An appointed Leadership Council member may be removed from their seat for the reasons outlined above by any of the following methods:

- By the appointing entity, in the same manner as the appointment was made or

- By a majority vote of the Leadership Council members present at a Council meeting so long as a quorum has been established.

Upon removal, the appointing entity will appoint a new member.

**Elected Seats.** A Leadership Council member elected by the CoC membership may be removed from their seat for the reasons outlined above by a majority vote of the Leadership Council members present at a Council meeting so long as a quorum has been established. Vacancies shall be filled by the Nominating Committee and elected by the membership.

## 5.7 CONFLICTS OF INTEREST

Leadership Council members must abide by the Conflict of Interest guidelines laid out in the [CoC Program Interim Rule](#). No Council member may influence decisions concerning the award of a grant or other financial benefits to the organization that the member represents or to them as individuals. Therefore, any individual participating in or influencing decision-making must identify actual or perceived conflicts of interest as they arise and comply with the letter and spirit of this policy. Disclosure should occur as soon as possible before discussing any such issue. Disclosures shall be recorded in the meeting minutes. Individuals with a conflict of interest should abstain from discussion and voting on any issue in which they may have a conflict.

Leadership Council members will not be permitted to participate in a discussion or vote until an annual signed COI statement is on file with the Lead Agency. The Leadership Council and its committees and workgroups shall comply with federal, state, and local laws and regulations. The business of the CoC shall be conducted to avoid all conflicts of interest. The program standards for conflicts of interest described by the U.S. Department of Housing and Urban Development's Interim Rule for the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH Act) are found at 24 CFR Part 578.95 (available at [www.hudexchange.info](http://www.hudexchange.info)).

Council members participating in scoring funding applications cannot be employees, agents, consultants, board members, or married to someone employed by any organization, non-profit, or government department that is a recipient or sub-recipient of Continuum of Care Funding.

## VI. LEAD AGENCY/COLLABORATIVE APPLICANT

The collaborative applicant is the organization designated by the CoC to submit the required CoC application for all projects selected for funding and apply for CoC planning funds through HUD's published funding opportunities under the CoC Program. The term Lead Agency describes the agency designated to be the collaborative applicant and the primary organization responsible for planning, managing, and coordinating the CoC's activities, through provision of administrative support. The Lead Agency plays a central role in ensuring that the CoC operates effectively and efficiently in its mission to prevent and end homelessness. The current designated collaborative applicant for FL-515 is Doorways of Northwest Florida.

Only the designated Collaborative Applicant/Lead Agency is eligible to apply for state Staffing funds and CoC Planning funds through the applicable grant opportunities. These funds will be used to provide dedicated staff and resources to carry out the Lead Agency's responsibilities.

The Lead Agency works closely with the Leadership Council, the membership, and its committees and workgroups to effectively coordinate the Housing Crisis Response System to achieve the CoC's vision.

## **6.1 COLLABORATIVE APPLICANT/LEAD AGENCY RESPONSIBILITIES**

Key responsibilities of the CoC Collaborative Applicant/Lead Agency include:

1. **Administrative Support:** Providing logistical and administrative support for CoC activities, including organizing meetings, maintaining records, and facilitating communication among CoC members. This includes holding meetings of the full CoC membership, with published agendas, at least semiannually, and staffing CoC committees and workgroups, as well as maintaining a CoC web presence
2. **Federal Funding Coordination:** Managing the application process for HUD's CoC Program funding. Federally, this includes preparing and submitting the published CoC funding applications, known as the Notice of Funding Opportunity (NOFO). Only the named Collaborative Applicant is eligible to submit the CoCs consolidated application for HUD CoC Program Funds.
3. **State Funding Coordination:** Working with the Leadership Council to design and manage a fair and transparent process to award State-funded homeless grants, including TANF, Emergency Solutions Grant, Staffing, Challenge grants, and any other funding source by which the lead agency/collaborative applicant is the eligible applicant on behalf of the CoC. The Lead Agency must consult with the State ESG recipient (Department of Children and Families) on the use of ESG funds and progress toward program goals.
4. **Local Government Coordination:** Working with the relevant local governments in the geographic area to coordinate resource allocation to address homelessness effectively and consulting with entitlement jurisdictions to ensure that the Consolidated Plan is aligned with the CoC's strategies and plans to allocate resources that meet the needs of homeless individuals and families and persons at risk of homelessness.
5. **Monitoring and Compliance:** Ensuring CoC-funded projects comply with HUD, State, and other funding requirements and relevant regulations. This includes monitoring program performance, conducting site visits, and providing technical assistance to CoC members.
6. **Performance Measurements:** Working with the Leadership Council to determine specific performance measures and benchmarks that consider the needs of people experiencing homelessness, including subpopulations.
7. **Coordination and Collaboration:** Facilitating collaboration among CoC members, including service providers, government agencies, and other stakeholders, to coordinate a comprehensive and integrated system of care for individuals and families experiencing homelessness. This includes the implementation and evaluation of the Coordinated Entry system throughout the geographic area.

8. **Strategic Planning:** Assisting the Leadership Council in developing and implementing a strategic plan to address homelessness. This involves an annual gaps analysis of the homeless needs and services available, identifying priorities, identifying funding, setting goals, and tracking progress.
9. **Point-in-Time (PIT) Count:** Conducting the PIT count according to HUD's requirements, at least biennially.
10. **Training and Capacity Building:** Providing training and support to CoC members to enhance their capacity to deliver effective services. This includes organizing workshops, sharing best practices, and offering technical assistance.
11. **Community Engagement:** Engaging with the broader community to raise awareness about homelessness, foster partnerships, and mobilize resources. The Lead Agency often acts as a spokesperson for the CoC in public forums and with the media.
12. **VAWA:** Developing the emergency transfer plan, in consultation with victim service providers for the CoC that meets the most current VAWA requirements.

## 6.2 LEAD AGENCY OVERSIGHT AND SELECTION PROCESS

The Leadership Council will hold the Lead Agency accountable for performance through a Memorandum of Understanding (MOU) that is reviewed and updated annually. Any member of the Leadership Council with a conflict of interest shall not participate in the Lead Agency's annual review. The Leadership Council may designate a committee to complete the review. If the Lead Agency fails to meet the expectations within the MOU, whether through a performance review or other measure, the Leadership Council will develop a performance improvement plan (PIP) with the deficiencies, recommendations, and a timeline to cure them. The PIP will be shared with the CoC membership.

**Failure to Perform.** If the Lead Agency does not cure the deficiencies according to the expectations detailed in the PIP, the Leadership Council will select a new Lead Agency using the following process.

1. The Leadership Council will notify the CoC membership of the performance deficiencies and the process to select a new Lead Agency.
2. The Leadership Council will vote to remove the current Lead Agency. A supermajority of two-thirds of all current Leadership Council members is required to proceed.
3. CoC membership will vote to codify the leadership council decision to remove the lead agency and 2/3<sup>rd</sup> of membership has to agree with leadership council vote to move forward with removal of a lead agency.

Process to select a new lead agency/collaborative applicant

4. Once the vote has passed, the Leadership Council, or a committee designated by the Leadership Council, will develop and issue a Request for Proposals (RFP) for organizations to apply for the Lead Agency.

5. Based on the proposals submitted, the Leadership Council will select a new Lead Agency with a two-thirds supermajority vote of all current Leadership Council members. In the case that two or more applicant organizations have comparable scores on their submission to the Leadership Council, a simple majority vote of all current Leadership Council members will be sufficient to move forward with the vote to select a new Lead Agency.
6. CoC membership will vote to codify
7. The Leadership Council will notify the CoC membership of the selection of the new Lead Agency through the agenda and materials that are sent at least two weeks in advance of the next CoC general membership meeting or a special meeting.

**Emergency removal.** The Leadership Council is responsible for determining instances in which the Collaborative Applicant/Lead Agency may need to be immediately removed. These instances include:

1. Fraud, meaning:
  - a. Conclusive evidence of fraudulent activity
  - b. Reasonable suspicion supported by credible evidence
  - c. Admission of fraudulent conduct
  - d. Ongoing investigation revealing substantial indicators of fraud
2. Failure to submit the collaborative application
3. Requirement from HUD or the Department of Children and Families to remove the Lead Agency

## VII. HMIS LEAD

The Homeless Management Information System (HMIS) Lead is the entity responsible for the administration and management of the CoC's HMIS. The HMIS is a locally administered, electronic data collection system that stores longitudinal client-level information about individuals and families who access homeless services. The role of the HMIS Lead is crucial for ensuring data quality, security, and compliance with federal and local requirements. The current HMIS Lead for FL-515 is Doorways of Northwest Florida.

### 7.1 RESPONSIBILITIES

Key responsibilities of the HMIS Lead include:

- Applying for HUD CoC Program funding to operate the CoC's HMIS
- Ensuring that projects are meeting national, state, and local data quality objectives
- Ensuring that the CoC has an HMIS data privacy plan, security plan, and data quality plan
- Ensuring that the HMIS is administered in compliance with requirements prescribed by HUD
- Ensuring consistent participation by recipients and subrecipients in HMIS
- Providing training and technical assistance to HMIS users
- Reviewing data quality

- Submitting required reports to HUD and the Department of Children and Families
- Providing regular system performance reports to the Leadership Council

## 7.2 OVERSIGHT AND SELECTION PROCESS

The Leadership Council will hold the HMIS Lead accountable for performance through a Memorandum of Understanding that is reviewed and updated annually. Any member of the Leadership Council with a conflict of interest shall not participate in the HMIS Lead's annual review. Only the HMIS Lead is eligible to apply for HMIS funds through HUD's annual funding application for the CoC Program. These funds will be used to provide dedicated staff and resources to carry out the HMIS Lead's responsibilities.

The process for performance reviews, performance improvement plans, failure to perform, selection, and removal follows the process outlined in 6.2.

## VIII. COMMITTEES AND WORKGROUPS

The work of the CoC is extensive, and there are many responsibilities that a single entity, whether that be the Leadership Council, Lead Agency, HMIS Lead, or the membership, cannot effectively manage on its own. Therefore, the CoC, through its Leadership Council, will establish committees (ongoing or ad hoc) and workgroups (time-limited) to facilitate the CoC's work.

Each committee and workgroup will have a clear purpose, publish agendas and minutes, and communicate its findings, recommendations, and concerns to the Leadership Council. In establishing committees, the Leadership Council will include categories of expertise and stakeholder groups it desires to include on each committee.

Each committee should include people with lived experience, at least one Leadership Council member, and one Lead Agency or HMIS Lead representative. Committees are open to people who have expertise and interest in the subject matter of the committee. Committees should elect their own chair, subject to ratification by the Leadership Council. Committee chairs must be a member in good standing. The Leadership Council must approve a committee member who does not hold active CoC membership.

### STANDING COMMITTEES

Standing committees designated to carry out specific charges for the CoC are detailed as follows.

**Governance and Strategy Committee:** In addition to tasks related to governance and strategic planning and implementation, this committee will function as the executive committee. This committee's responsibilities include;

- Ensure completion of Annual Gaps and Needs Analysis, with Lead Agency
- Ensure a CoC Strategic Plan is developed and followed

- Review the CoC Governance Charter annually and make recommendations for amendment and revisions if necessary to the general membership
- Complete the Lead Agency and HMIS Lead MoU and Evaluation
- Ensure other CoC Committees are maintaining progress of achieving the CoC Strategic Vision and Plan

**Committee Composition:** 6-9 members, including the CoC Leadership Council Chair, Vice Chair, Secretary, Homeless Services Provider, , HMIS and Data Improvement Committee Chair, , and up to 3 additional general coc members, as well as Lead Agency Executive Director in a non-voting capacity

**Nominating Committee:** This committee's primary responsibilities relate to recruitment and retention of members for the CoC, as well as developing and implementing a process for electing Leadership Council members. This committee will ensure that membership is broad and representative of the geography and the necessary sectors relevant to resolving homelessness. This committee's responsibilities include;

- Develop and monitor, with the Lead Agency, CoC membership criteria and application process
- Invite new members to join through a publicly available process at least annually
- Review membership application denials and removals
- Develop application process, forms, and criteria for Leadership Council nominations
- Identify and recruit diverse stakeholders to submit nominations for vacant Leadership Council seats
- Review all nominations and applications for elected Leadership Council seats
- Contribute to CoC Strategic Plan regarding diversifying and expanding CoC membership

**Committee Composition:** 7-13 members, including at least one CoC officer, one CoC Lead Agency representative, one person with lived experience, one homeless service provider, as well as up to 9 additional CoC members.

**Application Review and Evaluation Committee:** This committee's primary responsibility is to review and evaluate project proposals from local service providers applying for funding through the CoC. This committee will make recommendations about funding changes to the Leadership Council for consideration. This committee's responsibilities also include;

- Provide recommendations to the Leadership Council and CoC membership on potential reallocation of resources based on CoC plans, strategies, priorities, gaps, and project and system performance.
- Provide recommendations to the Leadership Council on strategic resource allocation, including serving as the rating and ranking committee in the annual CoC Competition and reviewing project applications for other federal, state and local funding opportunities flowing through the CoC.

**Committee Composition:** 5-7 members, including at least one CoC officer, , one person with lived experience, as well as up to 4 additional members that are not funded through HUD CoC or State homeless grants. And one CoC Lead Agency representative to support the work of the committee as a non-voting participant.

**Coordinated Entry Committee:** This committee is responsible for overseeing the adoption and implementation of the CoC-wide Coordinated Entry System, including ongoing planning necessary for implementation and operation of the CES, engagement of partners, service providers, access points and stakeholders for their feedback on improving the CES. In addition to these responsibilities, this committee is responsible for;

- Investigating and resolving consumer and provider complaints or concerns related to the CES
- Providing information and feedback to the membership and leadership council on data generated from the CES, necessary for planning and resource allocation
- Ensuring the CES is evaluated and efforts to improve and expand the CES are implemented
- Review and recommend changes to the CES Policies and Procedures, including the standardized assessment tool utilized in the process.

**Committee Composition:** 7-13 members, including at least one CoC Lead Agency representative, one person with lived experience, a representative from each CES Access Point, and representatives from service providers offering prevention, emergency shelter, transitional housing, rapid rehousing, permanent supportive housing and/or case management.

**HMIS and Data Improvement Committee:** This committee is responsible for assisting the Leadership Council and the HMIS Lead with their responsibilities to oversee and implement the HMIS in compliance with HUD's requirements. The HMIS and Data Improvement Committee will;

- Review, revise, and recommend a CoC HMIS data Privacy Plan, data security plan and data quality improvement plan to the Leadership Council
- Review HMIS administration and operations and recommend any changes needed to ensure compliance with HUD requirements
- Make recommendations to ensure consistent participation in the HMIS by CoC and ESG recipients and sub-recipients
- Evaluate and monitor System Performance Measures across projects and the CoC and make recommendations for strategies that will improve the System Performance Measures.
- Evaluate the HMIS Lead and make recommendations about performance improvement to the Leadership Council.

**Committee Composition:** 7-11 members, including at least one HMIS Lead representative, a representative from each intervention area utilizing HMIS, including prevention, emergency shelter, transitional housing, rapid rehousing, permanent supportive housing and/or case management, as well as other CoC members with an interest in HMIS and data analytics.

## WORKGROUPS AND AD HOC COMMITTEES

The Leadership Council may establish workgroups and/or ad hoc committees as necessary to complete the work of the CoC. A workgroup or ad hoc committee can be established through a vote of the Leadership Council, whereby the proposed workgroup or ad hoc committee is presented with the specified scope, charge, and purpose, ideal committee composition, and expected duration of time the committee or workgroup is needed. If a committee or workgroup needs to become a standing long-term activity of the CoC, it should be adopted into the charter as part of the next charter revision.

## IX. GENERAL PROVISIONS

This Governance Charter will be reviewed at least annually, and revisions will be recorded. The CoC membership will ratify the initial Governance Charter and approve the annual updates as developed and recommended by the Leadership Council or their designated committee.

### Accessibility

Public meetings are held in ADA-accessible spaces and accommodate persons with disabilities (e.g., offering language interpretation, language line translation services, and materials in alternative formats). Upon request, accommodations are available to the public for meetings. All requests for reasonable accommodations must be made at least ten working days in advance of the scheduled meeting date. For additional information, contact Doorways of Northwest Florida at 850-215-8800. or [director@doorwaysnwfl.org](mailto:director@doorwaysnwfl.org)

## X. APPENDIX A: DEFINITIONS

Below are commonly used terms within HUD's Continuum of Care programs and documents. While these are not all referenced within the Governance Charter, it is important for the entities responsible for carrying out CoC responsibilities to be familiar with these terms.

**Annual Homeless Assessment Report (AHAR).** HUD report to the U.S. Congress that provides nationwide estimates of homelessness, demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons. The report is based on HMIS data about persons who experience homelessness during a 12-month period, point-in-time counts of people experiencing homelessness on a single day in January, and inventory of shelter and housing available in a community.

**At Risk of Homelessness.** [24 CFR Part 576.2](#) of the ESG Interim Rule and [24 CFR 578.3](#) of the CoC Interim Rule defines At Risk of Homelessness. The definition in the Rule is detailed and should be reviewed for specific details about the definition.

**Chronically Homeless.** The final rule for the definition of chronically homeless and recordkeeping requirements were published in the Federal Register on December 4, 2015 with an effective date of January 4, 2016 and CoC Program recipients were required to comply no later than January 15, 2016. Review the [Chronically Homeless Final Rule](#) for details about the definition and the recordkeeping requirements.

**Collaborative Applicant.** The Collaborative Applicant is the eligible applicant designated by the CoC to collect and submit the CoC Registration, CoC Consolidated Application, and apply for CoC planning funds on behalf of the CoC during the CoC Program Competition. May also apply to HUD to be designated as a Unified Funding Agency (UFA).

**Consolidated Plan.** HUD approved plan, developed by states and local jurisdictions per the requirements of [24 CFR part 91](#) to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions.

**Continuum of Care (CoC).** The group organized to carry out the responsibilities required under [24 CFR part 578](#) and is composed of representatives of organizations, including nonprofit homeless service providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless individuals to the extent these groups are represented within the geographic area and are available to participate.

**Centralized or Coordinated Assessment System (Coordinated Entry).** A centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals. The system covers the geographic area, is easily accessible and should ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs.

**Developmental Disability.** A severe, chronic disability of an individual that: (1) Is attributable to a mental or physical impairment or combination of mental and physical impairments; (2) Is manifested before the individual attains age 22; (3) Is likely to continue indefinitely; and (4) Results in substantial functional limitations in three or more of the following areas of major life activity: (i) Self-care; (ii) Receptive and expressive language; (iii) Learning; (iv) Mobility; (vi) Self-direction; (vii) Capacity for independent living; and (viii) Economic self-sufficiency, (ix) Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

**Disability.** A person is considered to have a disability if the disability meets all of the following four criteria: 1. is expected to be of long, continuing, or indefinite duration; 2. substantially impedes the individual's ability to live independently; 3. could be improved by the provision of more suitable housing conditions; and 4. is one or more of the following: (a) physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury; and/or (b) developmental disability (please review full definition); and/or (c) the disease of acquired immunodeficiency syndrome or any condition arising from the etiologic agency for acquired immunodeficiency syndrome.

**Emergency Solutions Grant (ESG).** HUD program that provides funding to: (1) improve the number and quality of emergency shelters for homeless individuals and families; (2) help operate these shelters; (3) provide essential social services to shelter residents; and (4) prevent families and individuals from becoming homeless.

**e-snaps.** The electronic grants management system used by HUD's Office of Special Needs Assistance Programs (SNAPS). This system supports the CoC Program applications for funding consideration and grant awards process for conditionally awarded projects under the HUD CoC Program.

**Fair Housing Act.** Federal regulations that protect people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities. Additional protections apply to federally assisted housing.

**HMIS Lead.** The eligible applicant designated by the CoC, in accordance with the CoC Program Interim Rule, to manage the CoC's HMIS on the CoC's behalf.

**Homeless.** On December 5, 2011, The Homeless Emergency Assistance and Rapid Transition to Housing: Defining “Homeless” Final Rule was published in the Federal Register. This rule defines four categories of homelessness and the corresponding recordkeeping requirements. Review the full Homeless Definition Final Rule for details about the definition and record keeping requirements. Note the related Defining Chronically Homeless Final Rule published December 4, 2015 for additional information.

**Homeless Management Information System (HMIS).** A local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Each CoC is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards.

**Homelessness Prevention.** A component of ESG assistance where funds are provided to individuals and families who meet the “at risk of homelessness” definition or who meet the criteria in paragraphs (2), (3), or (4) of the “homeless” definition in [24 CFR 576.2](#) and have an annual income below 30% of the median family income as determined by HUD, and lack the resources to obtain permanent housing. See [24 CFR 576.103](#) of the ESG Interim Regulations.

**Housing Inventory Count.** An inventory of housing conducted annually during the last ten days of January. The count tallies the number of beds and units available on the night designated for the count by program type, and those dedicated to serve specific sub-populations of persons. CoC Program funds. (See 24 CFR 578.73(c) of the CoC Interim Rule for more information).

**Longitudinal Systems Analysis (LSA).** Produced from a CoC’s HMIS and submitted annually to HUD via the HDX 2.0. The LSA provides HUD and CoCs with critical information about how people experiencing homelessness use their system of care.

**Order of Priority.** Established by CoCs for dedicated and prioritized PSH projects to ensure that those persons with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens and with the most severe service needs are given first priority. See [HUD Notice CPD-16-11](#) for more information.

**Permanent Supportive Housing (PSH).** A CoC program component type providing indefinite leasing or rental assistance combined with supportive services for disabled persons experiencing homelessness so that they may live independently.

**Planning Grant.** Non-renewable, annual grant awarded to the collaborative applicant to assist the CoC in carrying out its responsibilities that include among other activities: development of strategies for ending homelessness, evaluating project outcomes, submission of the CoC application to HUD and conducting the Point-in-Time Count.

**Point-in-Time (PIT) Count.** An unduplicated count on a single night within the last 10 days of January of the people in a community who are experiencing homelessness including both sheltered and unsheltered populations

**Rapid Re-Housing (RRH).** A permanent housing solution emphasizing housing search and relocation services and short- and medium-term rental assistance to move homeless persons and families (with or without a disability) as rapidly as possible into housing.

**Recipient.** An applicant of CoC Program funds that executes a grant agreement with HUD for CoC Program funds. To be eligible to apply for CoC Program funds, an applicant must be a private nonprofit organization, State, local government, or instrumentality of State or local government, Indian Tribes and Tribally Designated Housing Entities (THDEs) (as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103), and or a public housing agency as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion

**Street Outreach.** Essential services related to reaching out to all unsheltered individuals and families experiencing homelessness with the CoC's geographic area, including those least likely to request assistance. Services include connection to emergency shelter, housing, critical/crisis services, and urgent, non-facility-based care.

**Subrecipient.** A private nonprofit organization, State or local government, or instrumentality of a State or local government, Indian Tribes and Tribally Designated Housing Entities (THDEs) (as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103), and or a public housing agency as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion that receives a subgrant from a recipient to carry out all or part of a CoC Program project.

**Violence Against Women Act (VAWA).** Creates and supports comprehensive, cost-effective responses to the pervasive crimes of domestic violence, sexual assault, dating violence, and stalking.

**Written Standards.** Written guidelines required for CoC and ESG recipients that establish standards for administering assistance that reflect local program design and need. The written standards must include policies and procedures for evaluating eligibility and determining and prioritizing which individuals and families will receive assistance.

## XI. APPENDIX B: FL-515 MATRIX OF COC ROLES & RESPONSIBILITIES

The left-hand column describes the responsibility the Continuum of Care (CoC) has per 24 CFR 578 governed by HUD. The columns to the right of each responsibility details the entity(s) and type of role they play with regard to approval and oversight, primary responsibilities, and supporting roles necessary to achieving the goals related to the responsibility.

Responsibility (Per 24 CFR 578 CoC Program Interim Rule)	Roles		
	<u>Approval and Oversight</u> <sup>1</sup>	<u>Primary Responsibility</u> <sup>2</sup>	<u>Support Roles</u> <sup>3</sup>
<b>1. Operating the Continuum of Care</b>			
a. Hold meetings of the full membership, with published agendas, at least semi-annually	<i>CoC Leadership Council (Oversight)</i>	<i>Lead Agency</i>	
b. Make an invitation for new members to join publicly available within the geographic area at least annually	<i>CoC Leadership Council (Oversight)</i>	<i>Lead Agency</i>	
c. Adopt and follow a written process to select board members to act on behalf of the CoC. The process must be reviewed, updated, and approved by the CoC membership at least once every 5 years	<i>CoC Full Membership (Approval)</i>	<i>Nominating Committee</i>	<i>Lead Agency</i>
d. Appoint committees, subcommittees, or workgroups as may be deemed necessary.	<i>CoC Leadership Council (Oversight)</i>	<i>CoC Leadership Council</i>	<i>Lead Agency to assist with implementation, &amp; staffing committees</i>

<sup>1</sup> "Approval" indicates a requirement for a formal vote of the responsible body. "Oversight" indicates that reports and information will be provided to that responsible body by the Lead Agency, HMIS Lead, and/or Board committees.

<sup>2</sup> Primary Responsibility is the body that is ultimately responsible for ensuring the HUD regulation is met. While there are mostly clear distinctions between the membership, board, and Lead Agency, there are instances where the bodies may share responsibilities.

<sup>3</sup> A Support Role indicates those bodies should be consulted and/or an active participant in carrying out the HUD regulation in addition to those already listed.

Roles			
<b>Responsibility (Per 24 CFR 578 CoC Program Interim Rule)</b>	<b>Approval and Oversight<sup>1</sup></b>	<b>Primary Responsibility<sup>2</sup></b>	<b>Support Roles<sup>3</sup></b>
e. In consultation with the CoC Collaborative Applicant and the HMIS Lead, develop, follow, and update annually a Governance Charter, which will include all procedures and policies needed to comply with CoC requirements as prescribed by HUD; and a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the council	<i>CoC Leadership Council and Membership (Approval)</i>	<i>Lead Agency</i>	<i>Governance and Strategy Committee</i>
f. Consult with recipients and subrecipients of CoC funding to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers	<i>CoC Leadership Council (Approval)</i>	<i>Lead Agency</i>	<i>Application Review and Evaluation Committee</i>
g. Evaluate outcomes of projects funded under the Emergency Solutions Grants program and the CoC Program and report to HUD (Also includes State funded programs)	<i>CoC Leadership Council (Oversight)</i>	<i>Lead Agency</i>	<i>Application Review and Evaluation Committee, State (ESG Recipients)</i>
h. In consultation with the Collaborative Applicant, the HMIS Lead, and recipients of Emergency Solutions Grants funds, establish and operate a Centralized or Coordinated Assessment System that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services	<i>CoC Leadership Council (Oversight); Membership (Approval)</i>	<i>Lead Agency, Access Points, Coordinated Entry Committee</i>	

Roles			
Responsibility (Per 24 CFR 578 CoC Program Interim Rule)	Approval and Oversight <sup>1</sup>	Primary Responsibility <sup>2</sup>	Support Roles <sup>3</sup>
<p>i. In consultation with recipients of Emergency Solutions Grants funds within the geographic area, establish and consistently follow written standards for providing assistance. At a minimum, these written standards must include:</p> <ul style="list-style-type: none"> <li>i. Policies and procedures for evaluating individuals' and families' eligibility for COC assistance;</li> <li>ii. Policies and procedures for determining and prioritizing which eligible individuals and families will receive assistance;</li> <li>iii. Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;</li> <li>iv. Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and</li> </ul> <p>When the COC is designated a high-performing community, the COC will develop policies and procedures as set forth in 24 CFR 576.400(e)(3)(vi), (e)(3)(vii), (e)(3)(viii), and (e)(3)(ix).</p>	<p><i>CoC Leadership Council (Oversight and Approval)</i></p>	<p><i>Lead Agency</i></p>	<p><i>Coordinated Entry Committee, State (ESG Recipients); Providers, Membership, and Public (for distribution and feedback)</i></p>
<b>2. Designate and Oversee HMIS</b>			
a. Designate a single HMIS implementation/vendor for the geographic area	<i>CoC Leadership Council &amp; Membership (Approval)</i>	<i>HMIS Lead</i>	<i>HMIS Committee</i>
b. Designate an eligible applicant to manage the CoC's HMIS, which will be known as the HMIS Lead	<i>CoC Leadership Council &amp; Membership (super majority vote) (Approval)</i>	<i>CoC Leadership Council</i>	<i>HMIS Committee</i>
c. Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS	<i>CoC Leadership Council</i>	<i>HMIS Lead</i>	<i>One Roof HMIS Implementation</i>

Roles			
Responsibility (Per 24 CFR 578 CoC Program Interim Rule)	Approval and Oversight <sup>1</sup>	Primary Responsibility <sup>2</sup>	Support Roles <sup>3</sup>
d. Ensure consistent participation of recipients and subrecipients of CoC and Emergency Solutions Grants funding in the HMIS	<i>CoC Leadership Council</i>	<i>HMIS Lead</i>	<i>HMIS Committee</i>
e. Ensure the HMIS is administered in compliance with requirements prescribed by HUD	<i>CoC Leadership Council (Oversight)</i>	<i>HMIS Lead</i>	<i>HMIS Committee, One Roof Implementation</i>
3. <b>CoC Planning</b> - *CoC Leadership Council should be very active in all CoC planning activities listed in this section and may take a stronger role here			
a. Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. At a minimum, such a system will encompass the following: <ul style="list-style-type: none"> <li>i. Outreach, engagement, and assessment</li> <li>ii. Shelter, housing, and supportive services,</li> <li>Prevention strategies</li> </ul>	<i>CoC Leadership Council (Approval)</i>	<i>Lead Agency</i>	<i>Committees</i>
b. Planning for and conducting, at least, biennially, a Point-in-Time Count of homeless persons within the geographic area that meets the following requirements: <ul style="list-style-type: none"> <li>i. 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;</li> <li>ii. Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons;</li> <li>iii. Annual Housing Inventory Count; and, Other requirements established by HUD by Notice.</li> </ul>	<i>CoC Leadership Council (Oversight)</i>	<i>Lead Agency</i>	
c. Conducting an annual gaps analysis of the homeless needs and services available within the geographic area	<i>CoC Leadership Council (Review and Oversight)</i>	<i>Lead Agency</i>	
d. Providing information required to complete the Consolidated Plan(s) within the CoC's geographic area.	<i>CoC Leadership Council (Oversight)</i>	<i>Lead Agency</i>	

Roles			
Responsibility (Per 24 CFR 578 CoC Program Interim Rule)	Approval and Oversight <sup>1</sup>	Primary Responsibility <sup>2</sup>	Support Roles <sup>3</sup>
e. Consulting with State and local government Emergency Solutions Grants program recipients within the Continuum's geographic area on the plan for allocating Emergency Solution Grants funds and reporting on and evaluating the performance of Emergency Solutions Grants recipients and subrecipients	<i>CoC Leadership Council (Approval and Oversight)</i>	<i>Review and Ranking Committee</i>	<i>Lead Agency to support by providing pertinent information and communication; Local/State ESG Recipients/Subs</i>
<b>4. Other Responsibilities as outlined in the Charter</b>			
a. Designate a single eligible CoC Lead Agency/Collaborative Applicant to collect and combine the required application information from all applicants for the biannual HUD CoC funding competition. This entity also serves as the agency eligible for State of Florida CoC funding related to homelessness, including but not limited to the Challenge Grant, TANF, Staffing, and the State Emergency Solutions Grant.	<i>CoC Leadership Council &amp; Full Membership Super Majority Vote (Approval)</i>	<i>Governance and Strategy Committee</i>	
b. Establish the local process for applying, reviewing and prioritizing project applications for funding in the annual HUD CoC funding competition, State of Florida Challenge Grant funding, State of Florida Emergency Solutions Grant funding, and any other funding for which the CoC Lead Agency/Collaborative Applicant is the eligible applicant on behalf of the CoC.	<i>CoC Leadership Council (Approval and Oversight)</i>	<i>Lead Agency</i>	
c. Establish priorities that align with local and federal policies for recommending projects for HUD CoC grant funding and all funding for which the CoC Lead Agency/Collaborative Applicant is the eligible applicant on behalf of the CoC.	<i>CoC Leadership Council (Approval and Oversight)</i>	<i>CoC Lead Agency</i>	
d. Determine whether to require the CoC Lead Agency/Collaborative Applicant to apply for Unified Funding Agency designation from HUD.	<i>CoC Leadership Council (Approval and Oversight)</i>	<i>Governance and Strategy Committee</i>	<i>CoC Lead Agency</i>

Roles			
Responsibility (Per 24 CFR 578 CoC Program Interim Rule)	Approval and Oversight <sup>1</sup>	Primary Responsibility <sup>2</sup>	Support Roles <sup>3</sup>
e. Approve the final submission of applications in response to the HUD CoC Notice of Funding Opportunity and other funding for which the CoC Lead Agency/Collaborative Applicant is the eligible applicant on behalf of the CoC.	<i>CoC Leadership Council</i>	<i>Governance and Strategy Committee</i>	<i>Review and Ranking Committee, and Lead Agency</i>
f. Maintain the website to include CoC content including meeting times, meeting minutes, agendas, funding opportunities, CoC governance documents and relevant reports, a list of CoC Leadership Council members, a list of committees, and other relevant CoC information	<i>CoC Leadership Council (Oversight)</i>	<i>CoC Lead Agency</i>	
<i>This chart can be extended as items are agreed upon, revised, added, etc.</i>			

## XII. APPENDIX C: CONFLICT OF INTEREST DISCLOSURE FORM

Name: \_\_\_\_\_ Date: \_\_\_\_\_

FL-515 Continuum of Care for Bay, Calhoun, Gulf, Holmes, Jackson, & Washington Counties

### Code of Conduct and Conflict of Interest Disclosure

The Continuum of Care (CoC) is a membership, planning, and oversight body for Bay, Calhoun, Gulf, Holmes, Jackson, and Washington Counties of Florida. The purpose of the CoC is to develop and implement strategies to prevent and end homelessness in these six counties in northwestern Florida.

Members of the CoC, the CoC Leadership Council, and CoC Committee Members are committed to the highest ethical standards. The CoC Code of Conduct is designed to provide members of the CoC, CoC Committee members, and the Leadership Council with guiding principles as they carry out the charge of Operating a CoC, CoC Planning, Designating and Operating a Homeless Management Information System, and Preparing an Application for CoC Funds to pursue available resources to implement the CoC Plan.

### Mission and Guiding Principles

The FL-515 CoC envisions a Housing Crisis Response System that effectively prevents and ends homelessness by quickly connecting those in need of homelessness and housing supports with programming tailored to solve their episode of homelessness and prevent returns to homelessness by sustaining permanent housing opportunities. The CoC works as a collective body to ensure everyone has a safe, stable, and affordable place to live. The CoC holds each other accountable by committing to guiding principles.

All relevant organizations and individuals participating in the CoC uphold the following collective attributes and values;

- **Solution-Focused:** The CoC engages in solution-focused conversations and decision-making to address limited resources, systemic challenges, and ever-changing needs.
- **Geographically Diverse:** The CoC includes diverse representation among its membership from Bay, Calhoun, Gulf, Holmes, Jackson, and Washington counties in Northwest Florida.
- **Collaborative:** Including fellowship and networking among all citizens, organizations and systems that intersect with housing and homelessness.
- **Engaged and Committed:** CoC members' engagement and commitment is evidenced by active participation in meetings, committees, work groups, and volunteerism.
- **Value the voices of the CoC membership:** Robust representation of all subpopulations (e.g., veterans, unsheltered, disabling conditions, etc.) is critical to informed decision-making, as well as people with lived experience are meaningfully and intentionally included in the decision-making structure and discussions.

- **Data-Driven:** The CoC prioritizes the collection and use of data to guide decisions in program, funding, policy and system design changes to implement effective solutions that prevent and end homelessness.
- **Objective Decision-making:** Decision-making includes a wide range of members representing various sectors. The CoC will ensure that decisions consider the entire system's response instead of reflecting any special interests. Members will be heard and listened to regarding proposed system changes to ensure perspectives are shared and understood.

## CONFLICTS OF INTEREST

All members of the CoC will scrupulously avoid conflicts between the interests of the CoC on one hand, and personal, professional, and financial interests on the other. This includes avoiding potential and actual conflicts of interest, as well as perceptions of conflicts of interest. This applies to CoC Individual and Organizational Members, as well as Leadership Council Members and Committee Members.

### A. CONFLICT OF INTEREST

1. All members of the CoC, including committee and working group members, as well as Leadership Council Members, will scrupulously avoid conflicts between the interest of the CoC, and personal, professional and financial interests, including both potential and actual conflicts of interest, as well as perceptions of conflicts of interest.
2. Any individual participating in or influencing decisions must identify potential, actual, or perceived conflicts of interest as they arise and comply with the letter and spirit of this policy.
3. A financial conflict of interest is broadly defined to include a conflict by any CoC Member with any other Member(s), professional employment and groups, funding sources, and vendors, and with members of their immediate family or significant others.
4. Disclosure should occur at the earliest possible time and, if possible, prior to the discussion of any such issues.
5. Individuals with a conflict of interest shall abstain from both discussion and voting on any issues in which they may have a conflict.
6. An individual with a conflict who is serving as the CoC Board Chair shall yield that position during discussion and abstain from voting on the item.
7. Recommendations from CoC Committees and workgroups as well as decisions by the Leadership Council must be justifiable as being in the best interests of the CoC.
8. Minutes of meetings involving possible conflicts of interest shall record

such disclosure, abstention, and rationale for approval.

9. Additional commitments to support this by CoC members include refraining from influencing the selection of staff, consultants, or vendors who are relatives or personal friends or affiliated with, employ, or employed by a person with whom they have a relationship that adversely affects the appearance of impartiality.
10. Leadership Council Members and Review Committee Members participating in scoring funding applications cannot be employees, agents, consultants, board members, or married to someone employed by any organization, non-profit, or government department that is a recipient or sub-recipient of Continuum of Care Funding.

In an effort to support the CoC's collaborative value, where possible, conflicts of interest will be managed in a way that appropriately addresses actual and perceived conflicts of interest so that there can be the most participation by a wide variety of community representatives and subject matter experts.

### **Conflict of Interest Disclosure**

I presently have a relationship with the following business and non-profit organizations

(Include employment, contractual, consulting, board membership, and volunteering affiliations) :

**Name**

**Relationship**

1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____

**I UNDERSTAND THAT THIS POLICY IS MEANT TO SUPPLEMENT GOOD JUDGMENT, AND I WILL RESPECT ITS SPIRIT AS WELL AS ITS WORDING.**

Printed Name: \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

*Please return this completed form to Bryan Taylor, Executive Director,  
Doorways of NW FL, the Lead Agency for the CoC. [director@doorwaysnwfl.org](mailto:director@doorwaysnwfl.org)*

### XIII. APPENDIX D: SCHEDULE OF MANDATED FEDERAL AND STATE REPORTS

Report	Approximate Due Date	HUD/DCF/Both
Point In Time Count (PIT)	April 30 each year	Both
Housing Inventory Chart	April 30 each year	Both
System Performance Measures	February 28 each year	Both
Project Annual Performance Reports	Within 90 day of the end of the contract	HUD
Longitudinal System Analysis Data (LSA)	December each year	HUD
Monthly Status Report		DCF