September 2015 Steering Committee Meeting

Table of Contents

Agenda ........................................................................................................................................................................... 2
August Meeting Minutes .............................................................................................................................................. 3
TWH Communications Dashboard ............................................................................................................................. 7
Lead Agency Report ..................................................................................................................................................... 8
HMIS Lead Agency Report ....................................................................................................................................... 10
Memo: TDHCA ESG Updates .................................................................................................................................... 11
AGENDA

I. Call to Order – Daphne Lemelle  
   a) Roll Call

II. Approval of Minutes – Daphne Lemelle  
    a) August 13, 2015 CoC Steering Committee Meeting

III. The Way Home System Dashboard – Eva Thibaudeau

IV. Lead Agency Report/HMIS Administrator Report – Eva Thibaudeau

V. Old Business  
   a) TDHCA ESG RRH update – Eva Thibaudeau  
   b) System Updates – Eva Thibaudeau  
      • Income Now Updates  
      • Chronic surge  
   c) FY2015 CoC NOFA Updates – Eva Thibaudeau  
      • Technical updates re: scoring  
      • TH updates  
   d) Performance Monitoring – Eva Thibaudeau  
      • CoC Underspending Memo  
      • DV HMIS/Comparable Database

VI. New Business  
   a) Steering Committee location

VII. Announcements  
    a) Sept 22-23, 2015 Community Conversation on Youth/Young Adult Homelessness  
    b) September 24-25, 2015 True Colors Forty to None Summit

VIII. Public Comments

IX. Adjournment
Steering Committee Meeting

August 13, 2015

Minutes

Present: Thao Costis (SEARCH Homeless Services-Homeless Services Rep), Barbara Dawson (MHMRA rep), Heather Garza (City of Pasadena ESG), Marilynn Kindell (Fort Bend County ESG), Kelli King-Jackson (Simmons Foundation), Daphne Lemelle (Harris County Community Services Dept.), Dr. Laura Marsh (VA), Eva Thibaudeau (Lead Agency Staff), Charly Weldon (The BEACON-Homeless Services Rep), Carl Wiley (Consumer Rep)

Absent: Tory Gunsolley (Houston Housing Authority), Clay Kibler (Consumer Rep), Tom McCasland (Harris County Housing Authority), Neal Rackleff (COH), Mike Temple (H-GAC/Workforce Solutions)

The meeting of the Continuum of Care (CoC) Steering Committee was held on August 13, 2015 at the 3rd Ward Multiservice Center, 3611 Ennis St., pursuant to proper notification of all Steering Committee members.

Welcome and Introductions
Daphne Lemelle called the meeting to order at 3:37 pm. Barbara Dawson conducted roll call and Lemelle noted that there was a quorum.

Approval of Minutes
The minutes from the July CoC Steering Committee meeting were presented. Lemelle called for a motion to approve the July minutes as presented. Costis motioned, Weldon seconded. The minutes were approved.

Lead Agency Report—Presented by Eva Thibaudeau
- Eva presented The Way Home Dashboard, as of July 2015, 3,761 homeless Veterans have been housed, 2,584 chronically homeless individuals have been placed since January 2012.
- The Third Quarter Provider Input Forum is scheduled for August 25, 2015 from 9am to 10:30am at 8410 Lantern Point.
• The Third Quarter HMIS Forum is scheduled for Thursday September 17th at the Harris County Department of Education Conference Center located at 6300 Irvington Blvd. The primary focus will be the 2015 system upgrade.

• HHH will meet on August 28, from 9am-10:30am at Career and Recovery Resources 2525 San Jacinto Street, it will also coincide with hosting a visit from TDHCA staff who are conducting a state commissioned study on ending veteran homelessness.

• The Youth Conversation Planning Event is scheduled for September 22-23. The conversation committee is currently identifying experts in three broad youth issue areas including:
  o Housing options-youth & young adults
  o Connections with other systems of care
  o Employment and Education

• Twenty people attended the NAEH Conference on Ending Homelessness which included recognition of Houston ending veteran homelessness during the key note speech. Further, Houston and Ft. Bend were featured in multiple presentations including SSVF, RRH, funding collaboration, working with housing Authorities and best practices in serving chronically homeless veterans and LGBTQ.

• The Coalition will be hosting the Summer Conference Debrief at 600 Jefferson 1st floor conference room on Friday, August 14th from 10am to noon.

Old Business

TDCHA ESG

• The Texas Department of Housing and Community Affairs (TDHCA) has not responded affirmatively to a request from The Way Home CoC to award $553,765 to Fulton Village non-profit, an affiliate of the Houston Housing Authority for rapid re-housing financial assistance under the state ESG competition.

• The CMI (Catholic Charities of the Archdiocese of Galveston-Houston) will accept the award on behalf of the system and will increase the number of case managers dedicated to system-wide rapid re-housing.

• The FAI (Houston Housing Authority) will allow use of 150 vouchers for piloting of RRH – The Next Step to move non-disabled but multiple barrier households onto permanent subsidized housing. Looking for families that don’t meet Supportive housing requirements.

• A motion was filed for an amendment to the last decision regarding Rapid Rehousing for a Case Management Intermediary. Lemelle motioned, Kindell seconded, motion was approved.
Income Now

- Planning retreat for income partners August 2015, TWC will fund 17-18 Employment Specialists.

Managed Care

- Pursuing pilot with UHC, they will do training and would like to meet with leadership, connecting providers with coordinators as a one-stop shop.

CoC Workgroups

- Presented a list of current workgroups engaging in system works that are supported by HMIS, PM Team, and CoC Lead Agency.

Downtown Transitions

- Beacon suspending services temporarily for renovations beginning end of September 2015. Palmer Way Station has decide to closed, will be moving volunteers and operations to other locations. Ongoing conversations underway with local emergency shelters to offer day services for overnight guests and to allow expanded coordinated access hubs embedded in shelter.

Chronically Homeless Surge

- Executing Phase 2 of identifying and locating all existing chronically homeless individuals within our CoC, eleven City of Houston Council districts will be canvassed in eleven days utilizing community volunteers, assessors, agency staff and outreach teams. Next steps include unincorporated Harris County and Fort Bend County.

NOFA Updates

- Do not know when NOFA will be released. It will be more competitive. Coordinated access workgroup presented bonus points to the NOFA Scoring Tool: Coordinated Access Enrollments, Program Denials, and Length of time from Referral to Move-In were approved by the steering committee.

Announcements

- Sept 22-23, 2015 Community Conversation on Youth/Young Adult Homelessness
- Sept 24-25 True Color Summit, Rice University

Public Comments
Morris Fountain spoke about his organization Caring for Offender Families.

Adjournment

Upon approval, the meeting was adjourned at 4:44 pm.

Respectfully Submitted,  
________________________
Barbara Dawson, Secretary

Approved,  
________________________
Daphne Lemelle, Chairman

_____________________
Date
The Way Home is the collaborative model to prevent and end homelessness in Houston, Harris County, and Fort Bend County.

Goals:

- End Chronic Homelessness by 2015
- End Family Homelessness by 2020
- End Youth Homelessness by 2020
- Set a Path to End All Homelessness

2015 Point-In-Time:
- Total homeless: 4,609
- Unsheltered: 1,950
- Sheltered: 2,659

Since 2011 we have seen:
- A 46% decrease in overall homelessness
- A 56% drop in unsheltered homelessness
- A 58% reduction in chronic homelessness

Chronic Homelessness Milestone!
2,500 people housed... AND COUNTING! In July, our community reached a milestone: housing more than 2,500 chronically homeless individuals since January 2012 - 2,584 to be exact. Pictured to the left is our community’s housing “thermometer” and The Way Home pledge signed one year ago by partners and community stakeholders.
A. Work/Affinity Group Activities
   a. Networks, Initiatives and Affinity Groups
      i. CoC Provider Input Forum
         1. The Third Quarter Provider Input Forum was conducted August 25, 2015 from 9am to 10:30am at 8410 Lantern Point. Agency designated representatives were provided an overview of the Income Now Initiative which will begin implementation in the final quarter of 2015. The Coalition will provide a Lunch & Learn community presentation of the initiative on September 16th at the United Way.
         2. Nominations for the Provider Representative permanent housing seat on the CoC Steering Committee will be opened at the fourth quarter meeting scheduled for November 17th from 9am to 10:30pm.
      ii. CoC Consumer Input Forum
         1. The CoC Consumer Forum will take place during the final quarter and focus on domestic violence. Please note that the CoC will be hosting a Youth Conversation on September 22nd and is seeking input from youth and young adults who have lived experience.
      iii. HMIS Forum
         1. The Third Quarter HMIS Forum is scheduled for Thursday September 17th at the Harris County Department of Education Conference Center located at 6300 Irvington Blvd. The primary focus will be the 2015 system upgrade.
      iv. Housing Houston’s Heroes
         1. HHH met on August 28, from 9am-10:30am at Career and Recovery Resources 2525 San Jacinto Street. The workgroup hosted a visit from representatives of the Texas Department of Housing and Community Affairs who are conducting a state commissioned study on ending veteran homelessness. Representatives from Texas Veteran’s Commission also attended.
         2. The SSVF workgroup will meet on September 10th at US Vets from 11am-12:30pm and meets the second Thursday Monthly.
         3. Stand Down is scheduled for October 2, 2015 at the Latino Learning Center, 3522 Polk Street, Houston, TX 77003.
      v. Youth/Young Adult Affinity Group
         1. NEST Steering Committee met on August 20th from 1pm to 2:30pm at Montrose Center to further discuss plan implementation.
         2. The Youth Homelessness Community Conversation will take place on September 22 from 9am to 5pm with a report out on September 23 from 10 to noon. The event will take place at Harris County CPS located at 2525 Murworth, Houston, TX 77054. The committee is currently confirming experts in three broad youth issue areas including:
            a. Housing options
            b. Connections with other systems of care
            c. Employment and Education
      vi. RRH Workgroup
         1. The RRH Expansion Workgroup is meeting weekly on Wednesday mornings.
         2. The RRH Funders Collaborative workgroup is meeting monthly on the third Thursday from 3-4pm at City of Houston HCD, 601 Sawyer Street.
vii. Coordinated Access Workgroup
   1. 1115 team meetings conducted weekly from 2-3 on Wednesdays.
   2. 1185 team meetings conducted weekly on Wednesdays from 3-4pm.
   3. The Coordinated Access workgroup met multiple times during August to plan and implement the next phase of further Coordinated Access expansion with a possible addition of four HUB locations. The Coordinated Access Team meets the third Tuesday monthly from 12:00noon to 1:30pm at the BEACON.

viii. Income Now Workgroup
   1. The Income Now Leadership Workgroup is meeting weekly from 3:00pm to 4:00pm at SEARCH. Income Now provided an overview presentation at the August 25 Provider Input Forum and will provide a detailed presentation at the September 16th Lunch & Learn at the United Way.
   2. Income Now Design Retreat was completed on August 18th and 21st with participation from 21 representatives of community partners focused on coordinating access to income and mainstream employment.

B. Other CoC Items
   a. The Downtown Transition meetings are occurring on Fridays from 10-11am at the BEACON.
   b. The Way Home Coordinated Access team and community outreach workers led the first phase of an outreach surge from August 17-31 throughout Houston’s city council districts. The surge is focused on identifying and assessing persons who are chronically homeless and/or veterans for a housing option. Many community volunteers assisted with screening potential clients.
   c. Representatives from the Texas Department of Housing and Community Affairs and the Texas Veteran’s Commission conducted a site visit to Houston on August 27-28 regarding best practices to end veteran’s homelessness in the state pursuant to a study commissioned by SB 1580 from the Texas Legislature.
   d. World Homeless Day Awards have been opened for nominations on the Coalition’s website and are due by this Friday, September 11. The Service Partner Appreciation event will be held October 12 from 2pm to 4pm at Landmark River Oaks Theatre and feature a private screening of the film “@Home” followed by the awards presentation.
   e. The Collaborative Communications Committee held a networking mixer on August 31 at the Houston Housing Authority.
   f. The Housing Marketing Workgroup will host its first Landlord Event in late September, presenting testimonials aimed at recruiting properties to participate in the system’s Rapid Re-housing program.
A. Work Group Activities

B. Reporting
   a. Continued data analysis and support of the U.S. Veteran Affairs Supportive Services of Veteran Families program
      i. Continued to work with agencies to streamline the monthly SSVF upload process
      ii. Provided training to SSVF providers regarding data cleanup and reporting
   b. Continued to work on Community Solutions Veteran and Chronic Placement monthly report

C. Other CoC Activities
   a. Participated in RRH planning and HMIS implementation
   b. Continue to develop new and update current HMIS Policies and Procedures

D. Support
   a. Site Visits
      | Busy Bee Wellness Center |
   b. IssueTrak
      | Opened Before August 1, 2015 | 16 |
      | Opened in Period | 76 |
      | Closed in Period | 73 |
      | Left Open On August 31, 2015 | 19 |
   c. Training
      | New User | 16 |
      | Refresher | 1 |
      | Reports | 5 |
      | Data Explorer | 0 |
   d. Participating Agencies
      | Active | 61 |
      | New | 1 |
   e. Users
      | Active | 558 |
      | New | 17 |
   f. Clients
      | Enroll at any point | 28,436 |
      | New Enrollments | 1,717 |
This Memorandum is to inform The Way Home Continuum of Care Steering Committee about the current status of the TDHCA ESG funds allocated to our geographic jurisdiction.

Background

**Rapid Re-Housing (RRH) Redesign Continuum of Care History**

Following the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, the Houston/Pasadena/Harris County/Fort Bend County Continuum of Care (hereafter referred to as the CoC) began to coordinate service delivery across the CoC geography. This began with CoC wide standards for the provision of Emergency Solutions Grants funding, initially supported by public funders within the CoC in 2011. Since implementing Continuum-wide standards, entitlement communities that are members of the Houston/Pasadena/Harris County/Fort Bend County CoC have met regularly to solidify coordination across the continuum with both the CoC lead agency and among entitlement communities to ensure the most effective and efficient use of funding to end homelessness.

As part of this coordination, the CoC and ESG sub recipients have coordinated resources to create a standard Rapid Re-Housing (RRH) model of funding for the CoC. This funding model aims to increase the reach of RRH funds to provide assistance to families experiencing literal homelessness and to increase efficiency in services by standardizing service delivery packages among providers.

Funding for the CoC Rapid Re-Housing Model is collaborative and aligned across the geographic area. The standards, outcomes and business rules were developed using data to guide decision making. Funders from the cities and counties redesigned the RRH intervention to increase efficiency, extend the reach of funds and stabilize as many households within the CoC as possible. This model was designed to maximize the impact of public and private funds across the CoC (covering two counties, 50+ municipalities and four U.S. Department of Housing and Urban Development (HUD) entitlement communities which receive ESG).

The ESG subrecipients along with the CoC decided that within this new model, two RFP’s would be submitted. The RFP’s were seeking two intermediaries to manage the day to day operations and oversight of the RRH program. As such, RFP’s were released for fiscal management oversight (Financial Assistance Intermediary- FAI) and for case management oversight (Case Management Intermediary- CMI).

Members of the funding collaborative, made up of public funders which includes Federal, State and Local funds and private philanthropic and corporate funding partners, created a request for proposals for both entities and selected...
Houston Housing Authority (hereafter referred to as HHA) (later changed to the Fulton Village Redevelopment Corporation (FVRC) for reasons described later in this memo) as FAI and Catholic Charities of the Archdiocese of Galveston-Houston as CMI.

After selection as FAI, FVRC was responsible for the management, distribution and reporting for all financial assistance available through the rapid re-housing collaborative. These responsibilities include but are not limited to: managing multiple funding sources, tracking funding availability by source and type, classifying funds by individual funder, distributing funds based on sub recipient need, reporting to individual funding sources based on individual requirements, conducting rent reasonableness and housing quality standards inspections, interfacing with landlords, processing payments, maintaining effective communication with the case management intermediary and its subrecipients, maintaining effective communication with the CoC lead agency through Coordinated Access, conducting and maintaining quality data entry and overseeing the reporting and monitoring process for the FAI.

Required Switch from HHA to FVRC

HHA submitted the above mentioned Request for Proposal on October 22, 2014 to serve as the FAI for this rapid re-housing program as offered by the City of Houston, Harris County, Fort Bend County and City of Pasadena. The Proposal was selected for funding; however, the question subsequently arose as to whether HHA could directly receive ESG funds under applicable ESG statutory and regulatory requirements. After this question was raised, HHA requested guidance from Legal Counsel Ballard Spahr, LLP. The specific question posed was whether HHA or its non-profit instrumentality is an eligible intermediary recipient of Emergency Solutions Grant (“ESG”) funds received pursuant to the above-referenced RFP.

To answer this question, Ballard Spahr, LLP reviewed the statutory provisions applicable to the ESG program (42 U.S.C. §§ 11371-11378) (the “ESG Statute”), ESG regulations at 24 CFR Part 576 (the “ESG Regulations”), the Federal Register notice implementing the ESG Regulations (76 Fed. Reg. 75954 (Dec. 5, 2011)) (the “FR Notice”), HHA’s proposal dated October 22, 2014, responding to the above-described Request for Proposals (the “Proposal”), the Houston/Harris County Rapid Re-Housing Collaborative Financial Intermediary RFP Guidebook (the “RFP”), and HUD notices and regulations regarding public housing authority subsidiaries (24 CFR Part 943, Subpart C; Notice PIH 2007-15).

Based on their review of the regulations, it was concluded that did not believe that HHA could be a direct subrecipient of ESG funds but that there is nothing that would prohibit a subsidiary of HHA from receiving such funds so long as the subsidiary qualified as a “private nonprofit organization” as defined in the ESG Regulations.

Ballard Spahr, LLP also concluded that since a contract had not yet been executed in relation to the RFP, the CoC entities could request that HHA revise its proposal to indicate that an HHA subsidiary who qualifies as a “private nonprofit organization” as defined in the ESG Regulations.
organization” will carry out all subrecipient functions under the award and that all funds would be designated payable to that subsidiary. The staffing could still remain the same, so long as HHA staff provided such services pursuant to a shared services or similar agreement between HHA and the subsidiary.

Following this legal guidance, HHA requested that the recipient indicated in the original Request for Proposal be amended from HHA to FVRC; a non-for-profit subsidiary controlled by HHA. FVRC as a “private nonprofit organization” was then selected to carry out all subrecipient functions under the award. All funds contacts where changed to allow ESG money received to be designated to this entity for provision of the Financial Assistance Intermediary services. FVRC executed contacts with both the City of Houston and Harris County Community Services Department (May 2015 and July 2015 respectively).

**TDHCA ESG funds brought to the Coalition for the Homeless for Distribution**

In December 2014 the Texas Department of Housing and Community Affairs (TDHCA) announced their intention to allow The Coalition for the Homeless of Houston/Harris County (CFTH) who serves as lead agency for the CoC to administer a local competition to select Emergency Shelter Grant (ESG) recipients for our geographic jurisdiction. This decision allowed the CoC to make local decisions regarding how funds are used for prevention, rapid re-housing, street outreach and emergency shelter functions.

The Way Home CoC Steering Committee recommended that $627,408 be designated for the system model of Rapid Re-Housing. On behalf of the CoC the lead agency released an Request for Proposed for these funds due on February 27, 2015 in which FVRC once again applied for additional RRH funding to be administered as FAI. After review by a combined committee the FVRC was selected to receive $553,765 of the RRH TDHCA ESG allocation.

**Current Shifts in Opinion and Changes to Program Structure**

The lead agency for The Way Home CoC, through an open and transparent process, made a recommendation to the TDHCA that $553,765 be awarded to FVRC as a non-profit, an affiliate of HHA for rapid re-housing financial assistance through ESG funds. On June 1, 2015 the Lead Agency (CFTH) was alerted by TDHCA that the CoC recommendation of FVRC as a sub recipient of ESG funds was rejected by TDHCA. TDHCA’s rejection was based on the guidance of their legal counsel, as predicated by recommendations from their HUD field office’s (Fort Worth) interpretation of ESG regulations regarding “private non-profit organizations.”

On July 10, 2015 TDHCA hosted a conference call with their legal counsel, Houston Housing Authority leadership, Houston Housing Authority’s legal counsel and the CFTH’s Director of Programs. During this call the legal counsel sought by the HHA asserted that FVRC was an eligible sub recipient of ESG funds because of its non-for-profit status as recognized by the State of Texas and federal tax codes. TDHCA’s legal counsel responded that the ESG regulations specifically disallow a public housing authority from receiving funds as a sub recipient and allow only “private, non-profits” to be eligible sub recipients. TDHCA’s legal interpretation is that “ESG’s ‘private nonprofit organization’
definition excludes governmental organizations, such as PHAs, and additionally extends to not for profit/501(c)3 organizations that are controlled by PHA employees or board members. “ The Houston Housing Authority’s legal counsel challenged that interpretation of a 501(c)3 and asserted that there is no difference between a private and public not for profit in the tax code and that any entity recognized by the State of Texas as a 501(c)3 is an eligible recipient of ESG funds.

TDHCA interprets FVRC’s Articles of Incorporation to show FVRC is controlled by the PHA’s employees and board members and that as such the ESG definition of “private” nonprofit organization would exclude Fulton Village Redevelopment Corporation.” The Houston Housing Authority requested that, in light of their transparency of process and funding with HUD and other ESG funders, the TDHCA request further guidance from their HUD Field Office (Fort Worth).

Following the above mentioned events, the CFTH Agency Director of Programs was requested to participate in a conference call with the Houston HUD Field Office and members of the HUD national SNAP (Special Needs Assistance Programs) office. During the call it became clear that the intention of the call was to discuss the TDHCA funding decision regarding FVRC. The CFTH as lead agency for the CoC Lead was informed at this time that the SNAPS Office consulted with HUD’s office of legal counsel regarding Fulton Village Redevelopment Corporation’s eligibility/ineligibility as a sub recipient of ESG funds and was advised that the interpretation of the Fort Worth HUD Field Office was their interpretation as well. The Houston field office proceeded to notify the City of Houston that they should cease all payment activities to FVRC effective immediately with a call for explanation of alternate use of funds.

The City of Houston and the CoC Lead Agency requested further clarification from the local field office regarding use of funds and PHA’s. The following is the response received by the local field office in response to their submission to the HUD Exchange:

“Thank you for submitting a question via the HUD Exchange. The response to your question is listed below.

**Question Subject:**

Contracting with PHA’s

**Question Text:**

Provider has asked - can a subrecipient of ESG funds (a non-profit) contract with a public housing authority for specific services such as conducting inspections for rapid re-housing and cutting checks to landlords?

Provider has been told that a recipient can not contract or create a subrecipient relationship with a PHA or an affiliate of a PHA in accordance with 24 CFR 576.2 "Private nonprofit organization means a private nonprofit organization that is a secular or religious organization described in section 501(c) of the
Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency." and "Subrecipient means a unit of general purpose local government or private nonprofit organization to which a recipient makes available ESG funds."


In the scenario above, can a subrecipient contract with a PHA for services or does the prohibition still exist?

Thank you

Response:

First, in order to answer your question, it is important to understand that there are key distinctions between subrecipients (including sub-subrecipients) and contractors—the two are not interchangeable. With this distinction in mind, although PHAs are not eligible subrecipients, as you correctly point out, recipients and subrecipients under the ESG and Continuum of Care (CoC) Programs may procure PHAs as contractors as a means of implementing discrete eligible program activities.

When selecting a contractor, the recipient/subrecipient must follow the procurement requirements in 24 CFR part 84 (government entities) or 85 (nonprofit organizations) or 2 CFR part 200, as applicable. A local government’s or private nonprofit organization’s own contracting process might not meet these requirements, so recipients/subrecipients must ensure that the process they use complies with HUD’s rules.

As a reminder, the procurement rules are based on free and open competition for the recipient/subrecipient to get the best deal for its grant dollars in obtaining goods and services from a qualified organization. The noncompetitive proposal method (procurement through solicitation of a proposal from only one source, or after solicitation of a number sources, competition is determined inadequate) is only permitted by 24 CFR § 85.36(d)(4) if other methods of procurement are infeasible and one of the specified circumstances applies. For additional guidance on using contractor in the ESG and CoC programs please review the SNAPS-Shots on this topic at https://www.hudexchange.info/resources/documents/SNAPS-Shots-Using-Contractors-in-ESG-and-CoC-Programs.pdf

Finally, please also note that if a housing authority is a department of the city or county government, then the city or county may carry out ESG activities through this department (as a recipient/subrecipient). However, this is a fairly rare situation. Please also note that many PHAs, while separate entities, are interwoven into and work so closely with the city or county government that some staff might not be aware that it is legally distinct. If there is any question, the city's or county's general counsel would usually be the one to make the determination.

Please note: the response provided in this email is specific to the question you submitted and may not
apply to similar questions. Therefore, please use discretion in providing the response to others, as the answer may not apply to their particular situations. “

Implications and Next steps

ESG Workgroup (comprised of ESG funders and CoC Lead Agency representative/s) will convene September 16, 2015 to decide on next steps available. Special consideration will be given to the timeframe left to spend current ESG funds.