



DESERT REGIONAL STEERING COMMITTEE AGENDA

OPENING REMARKS		PRESENTER
A. Call to Order (3 minutes) B. Pledge of Allegiance/Invocation C. Welcome and Introductions (10 minutes) D. Protocols		Jaelen Spencer / Dawn Quigg
E. Individual Committee Member Comments (3 minutes each) <ul style="list-style-type: none"> • City of Hesperia Representative..... • City of Barstow Representative..... • Town of Apple Valley Representative..... • Symba Center • City of Adelanto..... • Assemblymember Carrillo Representative..... • Sheriff's HOPE Team..... • GoGo Barstow..... • High Desert Homeless Services..... • Family Assistance Program..... • Victor Valley Family Resource Center VVFR..... • Community Member..... 		Melinda S/D Maribel H/D Kanisha W./D Antoinette J./D Steevonna E./D D Jaelen S./D Michael C. /D Elizabeth G./D Michael G./D Shannon W./D Sharon G./D Dawn Q./D
PUBLIC COMMENTS		
<i>To address the High Desert RSC regarding an item on the agenda, or an item within its jurisdiction but not on the agenda, please complete and submit a Public Comment Request form. Requests must be submitted before the item is called for consideration. Speakers may address the High Desert RSC for up to three (3) minutes total on the consent agenda, up to three (3) minutes on each item on the Discussion agenda, and up to three (3) minutes total on Public Comment.</i>		
CONSENT CALENDAR (5 mins)		
F. Approval of August 12, 2025 High Desert RSC Meeting Minutes		Jaelen/ Dawn
UPDATES / PRESENTATIONS (30 mins)		
G. Receive update on Continuum of Care Membership & Bylaws Committee Meeting – Outcome/Next Steps		Jaelan Spencer
H. Receive County Strategic Plan Update		Jaelen Spencer
DISCUSSIONS (30 mins)		
I. Receive update on Lived Experience Focus Group Discussion/County Survey Outcomes and Results		Jaelen Spencer
J. Receive an update regarding the San Bernardino County Anti-Camping Ordinance Discussion		Jaelen Spencer
K. Consider recommendation for the reallocation of HHAP3 funding to Family Assistance Program in the amount of \$388,627 related to Interim Sheltering for Permanent Supportive Housing for Seniors and authorize the High Desert Regional Steering Committee liaison to transmit the final recommendation to the Continuum of Care Board and Secretary.		Jaelen Spencer

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THE SAN BERNARDINO COUNTY HOMELESS PARTNERSHIP MEETING FACILITY IS ACCESSIBLE TO PERSONS WITH DISABILITIES. IF ASSISTIVE LISTENING DEVICES OR OTHER AUXILIARY AIDS OR SERVICES ARE NEEDED IN ORDER TO PARTICIPATE IN THE PUBLIC MEETING, REQUESTS SHOULD BE MADE THROUGH THE OFFICE OF HOMELESS SERVICES AT LEAST THREE (3) BUSINESS DAYS PRIOR TO THE PARTNERSHIP MEETING. THE OFFICE OF HOMELESS SERVICES TELEPHONE NUMBER IS (909)501-0610 AND THE OFFICE IS LOCATED AT 560 E. HOSPITALITY LANE SUITE 200. SAN BERNARDINO CA 92415. AGENDA AND DOCUMENTATION CAN BE OBTAINED THERE OR BY EMAIL. OHS@HSS.SBCOUNTY.GOV

CLOSING		
N. Adjournment		Jaelen & Dawn
Next Meeting:	Tuesday, November 11, 2025, 2:00pm – 4:00pm Life Church – 12199 Industrial BL. Victorville, CA 92395	

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Minutes for San Bernardino County Desert Regional Steering Committee Meeting

August 12, 2025, from 2:00 P.M. – 4:00 P.M.

Life Church 12199 Industrial Blvd., Victorville, CA 92395

TOPIC	PRESENTER	OPENING REMARKS
Call to Order Opening Prayer Invocation/Pledge	Jaelen Spencer & Dawn Quigg	<ul style="list-style-type: none"> The meeting was called to order at 2:11 p.m. Dawn Quigg: Meeting recorder
Welcome/ Introductions	Jaelen Spencer	<ul style="list-style-type: none"> Attendees were welcomed and Committee Board Members introduced themselves. <ul style="list-style-type: none"> Council Member Stevevonna Evans – City of Adelanto Elizabeth Givens – GoGo Barstow Shannon Waldron – Family Assistance Program Rochelle Clayton – City of Barstow Antoinnette “Nettie” Jackson – Symba Center Dawn Quigg – Victor Valley Rescue Mission Michael Grabhorn – High Desert Homeless Services Kanisha Withers - Town of Apple Valley Melinda Sayre – Deputy City Manager, City of Hesperia Michael Catalano – HOPE- INNROADS Team Jaelen Spencer – Assemblymember Juan Carillo’s Office (absent) Sharon Green – Victor Valley Family Resource Center
Audience Introductions	Attendees	<p>Committee members attending achieve a quorum (<i>seven or more in attendance</i>)</p> <p>Attendees introduce self and organizations and communities they represent.</p> <p>Keith Billig – Foothill Aids Project</p> <p>Cynthia Robles - Rolling Start</p> <p>Cynthia Fernandez – Inland SoCal United Way - 211 CES</p> <p>Samuel Shoup - BOS District 1 Paul Cook</p> <p>Elizabeth Cook – San Bernardino County Probation Dept.</p> <p>Shannon Waldron – Family Assistance Program</p> <p>Eugene Butticci – Desert Manna – Barstow</p> <p>Rose Bearshear – New Life Fellowship</p>

		<p>Terry Harmen – GOGO Barstow</p> <p>Shelly Hazelton – Family Assistance Program</p> <p>Karley Kalinich – Family Assistance Program</p> <p>Priyah Kalyn-Marsh – Love Your Best Life L.L.C.</p> <p>Tasha Brown – SBC Dept. Ageing & Adult Services</p> <p>Derek Banks – Quiet Spirit House</p> <p>Claudia Doyle – OHS</p> <p>Jimmy Waldron – High Dessert Homeless Services</p> <p>Kim Williams – Step-Up</p> <p>Matt Friedlander – Home Aid Inland Empire</p> <p>Manuel Thalan - Sherriff's HOPE Team</p> <p>Jeff Warhall – Sherriff's HOPE Team</p> <p>Angela Pasco – New Hope Village</p>
		PUBLIC COMMENT
Public Comment	Rose Beardshear New Life Church - Barstow	Funding obstacles for Faith Bases Organizations. Introduction of new Barstow City Manager: Rochelle Calyton. Her hiring of new Police Chief focuses on Homelessness and taking the City of Barstow Seat on the HDRSC.
	PRESENTER	REPORTS AND UPDATES
Committee member updates	Committee Members	<p>Council Member Stevevonna Evans – reports City of Adelanto and a developer propose a 100-bed unit serving youth and veterans proposed at the corner of Bartlett and Bellflower. The development is approved and contingent on receiving grant funds.</p> <p>Michael Grabhorn – Partner Family Assistance TAY Shelter build to be completed by next summer. HDHS focus is turning to providing Senior Housing to HD Unsheltered Seniors.</p> <p>Sharon Green – VVFRS 17 clients in Transitional Housing and 6 permanently housed clients. Filed a grievance on the Government Charter and the actions of the chair of the CoC Board.</p> <p>Mike Catalano – HOPE/INNROADS teams are continuing our work to the Unsheltered.</p> <p>Dawn Quigg – Announces surprise closure of the Victor Valley Rescue Mission by Rescue Mission Alliance. Shared timeline for closure. Recovery Homes to be closed by year end.</p> <p>Antoinnette Jackson – Symba Wellness Center – As of July only operator for the Wellness Center</p>

		<p>both shelter services and wraparound services. Looking at opening recuperative care referrals. Talking with City to be able to provide services to HD areas.</p> <p>Melinda Sayre – City of Hesperia – Announcing City of Hesperia’s Community Assistance Program from its General Fund. Each Councilmember gest to allocate a \$5000. To fund local non-profits with sheltering and food needs prioritized. Will grow this amount in 2026 with instructions by year end.</p> <p>Shannon Waldron – Family Assistance Program – waiting to take next step in TAY Tiny Home Development on C ST. \$5.8 million and 1 year to estimated completion.</p> <p>Kanisha Williams – Town of Apple Valley – No Report</p> <p>Elizabeth Givens – GoGo Barstow – Housing 1 new foster youth. Workshops for unhoused, housing insecure, and impoverished families. Goal to connect and support parents to, in turn, support their children. GoGo beginning Workforce development in the Guard Card training. Since October 2023 provided intakes and assistance to 230 unduplicated individuals and families. Housed 13 individuals and prevented evections for 15 families. Supported 46 in college enrollment, and secured employment opportunities for 24 individuals.</p> <p>Rochelle Clayton – City of Bartow – Working to modify or confirm transitional housing expenses. Partnering again with the HD Black Workers Center to support September Opening that will feature Employment and Workers Rights Workshops. Hosting October Shelter Court and increasing Outreach efforts.</p> <p>Jaelen Spencer – Office of Assembly Member Juan Carillo – Looking to run Homeless legislation in the next State Assembly. Reach out to let him know what will benefit this region.</p>
Office of Homeless Services Update	Claudia Doyle	<p>Revamping how Shelter Provider Sessions are done – next in-person meeting September 2025. Held at the Workforce Development Center at the Inland Center Mall.</p> <p>Multidisciplinary Meeting being revamped to a quarterly meeting.</p> <p>Next CoC meeting August 27, 2025, in person at Dorothy Ingram Learning Center.</p> <p>By Laws and Membership meeting August 13, 2025.</p> <p>Encouraged to attend HMIS Meetings, Needs Assessment Study, and the CoC HUD training. Look for September for Grant Management Training. Flyers on Information table.</p>

	PRESENTER	CONSENT CALENDAR
July 2025 Meeting Minutes approved	Committee	<p>Minutes reviewed by committee. No requests to edit.</p> <p>Motion to approve minutes made by Michael Grabhorn with second made by Sharon Green.</p> <p>Motion passed</p>
	PRESENTER	PRESENTATIONS
Ideal Progression LLC	Cheryl Bishop	Absent
	PRESENTER	DISCUSSIONS
Regional Chair Committee September 23, 2025	Jaelen Spencer	<p>Roundtable discussion. Topics: Governance, Governance Charter, Coc processes, agenda, item submission process, financial review, and the implications for smaller agencies. Upcoming elimination of Section 8 and Emergency Housing Vouchers in June of 2026. Looking to create a Legislative Advocacy Plan. Regarding HHAP Funding Regional approach is gaining momentum.</p> <p>Looking to establish Google Drive with desertrsc@gmail.com. For meeting information and to build a Roster.</p> <p>Last item, HHAP 3 discussion. How it relates to Governance Charter and tomorrow's meeting with By-Laws and Membership Committee.</p> <p>Pass meeting to Shaon Green – opening comments then to open the floor for discussion.</p>
HHAP 3 Funding Complaint	Sharon Green	<p>Discussed several inconsistencies with-in the By-Laws: Ex: Inconsistency between Chapters 3 and 9 regarding grievance procedures. Lack of clear procedures to challenge decisions or submit grievances. The redress policies are not clear on structure, procedures, or result of decision. CoC Board and Membership rolls are not clearly defined. Procedures are insufficient, contradictory, and unclear. The Brown Act is inconsistently followed. Voting procedure lack clarity and options. Compliant procedures are ambiguous. Also balance of authority ambiguous between CoC Board and RSCs. Funding approval processes are incompatible and murky; Grievance has been filed against CoC Governance Charter and the CoC Chair.</p> <p>Jaelen Spencer: Because of this action we will not be able to move forward until this issue is ironed</p>

		<p>out. Claudia discusses effects on this for timeline. Claudia Doyle: Grant expended deadline is June 30, 2026. I do not know how long Grievance process will take. By-laws Meeting tomorrow should shed light. Jaelen Spencer: Thus, we cannot move forward until resolution of this matter is resolved. HDRSC agrees.</p> <p>General Discussion:</p> <p>Rose Bearshear: Get more information on Faith-based funding issues. Understand Mortgage Standard vetting process.</p> <p>Jaelen Spencer: Focus Strategies Meeting: Concentrate on lived-experience interviews. Gift Cards from Homebase for participants.</p> <p>Take Survey Setting open virtual hours for HDRSC</p> <p>Antoinette Jackson: Establishment of Case Conferencing Committee. Gather HD agencies to report. Discussion resolves in 2x per month case management conference. Claudia to assist with Dashboard Presentation and investigate Virtual Presentation in this space, Goal: get on September Agenda.</p> <p>Discussion Closed: Meeting adjourned: Sharon Green – 1st, Antoinette Jackson - 2nd. Motion passed.</p>
		ADJOURNMENT
		<p>A motion is made to end the meeting and motion passes. Meeting is adjourned at 3:30 pm</p> <p>The next meeting for the High Desert Regional Steering Committee is Tuesday, October 14, 2025 Life Church 12199 Industrial Blvd., Victorville, CA 92395 2:00 pm – 4:00 pm</p>



HHAP 5- HIGH DESERT REGION



Eligible Use Categories/Amounts per Category

COC ALLOCATION FUNDING

TOTAL AMOUNT: \$6,032,369.26

Eligible Use Category	CoC Allocation
Rapid Rehousing	\$700,000.00
Prevention and Shelter Diversion	\$700,000.00
Delivery of Permanent Housing and Innovative Housing Solutions	\$1,046,544.00
Operating Subsidies- Permanente Housing	\$700,000.00
Street Outreach	\$600,000.00
Services Coordination	\$600,000.00
System Support	\$6000,000.00
Total	\$494,654.40
YSA	\$603,236.00
HMIS	\$60,324.00
Administrative Cost	\$422,265.26
Total	\$6,032,369.26



Eligible Use Categories/Amounts per Category

HIGH DESERT REGION

TOTAL AMOUNT: \$890,377.92

Eligible Use Category	High Desert Region
Rapid Rehousing	\$126,000.00
Prevention and Shelter Diversion	\$126,000.00
Delivery of Permanent Housing and Innovative Housing Solutions	\$188,377.92
Operating Subsidies- Permanente Housing	\$126,000.00
Street Outreach	\$108,000.00
Services Coordination	\$108,000.00
System Support	\$108,000.00
Total	\$890,377.92



THANK YOU/QUESTIONS?

Christopher Salazar- Administrative Manager

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&

Annette Florez- Administrative Supervisor

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Special Meeting of the: Bylaws and Membership Committee

Meeting date, time, and place Date: **August 13, 2025**
Time: **10:00 – 11:30 a.m.**
Location: **Program Development Division (Conference Room B)**
825 E. Hospitality Lane, San Bernardino, CA 92415

Bylaws & Membership Committee (Committee) members must attend the meeting in person.

The public may observe the meeting online at:

[Join the meeting now](#)

Meeting ID: 274 677 618 058 5 *** Passcode: wE2uq2do

+1 661-568-6806,,501991199# *** Phone conference ID: 501 991 199#

Note: Please remember to MUTE your phones. DO NOT place this call on hold should you get another call.
Hang up and then rejoin the meeting

To address the Committee regarding an item on the agenda, or an item within its jurisdiction but not on the agenda, please complete and submit a Public Comment Request form or if you are joining us virtually, indicate by typing “Public Comment” in the chat box. Requests must be submitted before the item is called for consideration. Speakers may address the Committee for up to three (3) minutes total on the Consent agenda, up to three (3) minutes on each item on the Discussion agenda, and up to three (3) minutes total on Public Comment.

Call to Order	Chair or Designee will call the meeting to order	10:00 – 10:10 am
Invocation/ Pledge	Chair or Designee will lead the Invocation and Pledge of Allegiance	
Introductions	Chair or Designee will lead the Roll Call of the Committee Members	

Agenda Items: The following items are presented for informational, consent, and discussion purposes.

Public Comment	Any member of the public may address the Committee on any matter not on the agenda that is within the subject matter jurisdiction of the Committee.	
Item No.	Consent	
1	Approve Minutes from June 12, 2023, Bylaws and Membership Committee Meeting – Jessica Alexander, Chair	10:10 – 10:15 am Pgs 3 – 12
Item No.	Discussion/Action Item/Deferred Items	
2	Receive nomination of up to two (2) members, to be elected to join the Bylaws and Membership Committee. – Jessica Alexander, Chair	10:15 – 10:30 am

3	Receive report regarding the grievance filed by Sharon Green on July 14, 2025, regarding governance structure and consider merits of conducting a future violation hearing in accordance with Chapter 9 of the Governance Charter. – Jessica Alexander, Chair	10:30 – 10:50 am Pg. 13
4	Receive report regarding the grievance filed by Sharon Green on August 4, 2025, regarding action on Victor Valley Family Resource Center’s HHAP-3 funding award and consider merits of conducting a future violation hearing in accordance with Chapter 9 of the Governance Charter. – Jessica Alexander, Chair	10:50 – 11:10 am Pg. 14
5	Set the date, time, and location for the next Bylaws and Membership Committee meeting. – Jessica Alexander, Chair	11:10 – 11:20 am
Committee Member Comments		
	Individual committee member comments. Each member is given 3-minutes to make comments.	11:20 – 11:30 am
Adjournment		11:30 am
Next Committee Meeting	TBD	

Mission Statement

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AGENDA AND SUPPORTING DOCUMENTATION CAN BE OBTAINED AT 560 E. HOSPITALITY LANE, SUITE 200, SAN BERNARDINO, CA 92408-0044.



Minutes for San Bernardino County Homeless Partnership Bylaws & Membership Committee Special Meeting

June 12, 2023

10:30 am – 12:00 pm

Program Development Division (Conference Room B)
825 E. Hospitality Lane, San Bernardino, CA 92415

Minutes Recorded and Transcribed by Joy Woodard, Secretary II, Office of Homeless Services

TOPIC	PRESENTER	ACTION
Call To Order	Jessica Alexander, Chair	<ul style="list-style-type: none"> The Special meeting was called to order at 10:38 a.m.
Introductions	Jessica Alexander, Chair	<ul style="list-style-type: none"> The following Bylaws & Membership committee members or their alternates were present for the meeting: <ul style="list-style-type: none"> Jessica Alexander, Mike Jones, Paul Fournier, Gabriel Fondario, Sharon Green Absent: None
PUBLIC COMMENT	PRESENTER	ACTION/OUTCOME
	Jessica Alexander, Chair	<ul style="list-style-type: none"> No Public Comments were made.
CONSENT	PRESENTER	
Approve Minutes of the June 1, 2023, Bylaws & Membership Committee Meeting	Jessica Alexander, Chair	<p>The Chair requested a motion to be made for the consent calendar portion of the agenda.</p> <ul style="list-style-type: none"> Sharon Green requested the minutes to be amended as follows: “Sharon Green: The terms will continue as HPN or CoC.” <p>No discussion ensued.</p> <p>The Chair requested a motion to be made including the amended changes to the consent calendar.</p> <p>Paul Fournier made a motion to approve the consent calendar with the amendment and was second by Sharon Green.</p> <ul style="list-style-type: none"> A vote was taken: 5 members were in favor: Jessica Alexander, Paul Fournier, Mike Jones, Gabriel Fondario and Sharon Green 0 members were opposed. <p>The motion was approved.</p>
DISCUSSION	PRESENTER	ACTION/OUTCOME
Appointment of New Members	Jessica Alexander, Chair	<p>The Chair stated that the new members were not present at the meeting. Mrs. Alexander stated that the Town of Yucca Valley had a representative that wanted to join the committee and Zelda Pacheco from Family Assistance Program wanted to join the committee.</p> <ul style="list-style-type: none"> Jessica Alexander- Asked Dr. Pat Leslie if she could explain how she will collaborate with Zelda Pacheco to help her understand the work the committee does and how important it is for the youth grant that youth member be involved in decision making.

		<ul style="list-style-type: none"> Pat Leslie- Stated she will be holding special office hours this week and invited Zelda Pacheco to attend to ask questions to understand how governance operates and the importance of the Committee and its structure. Paul Fournier- Asked if the committee is supposed to be comprised of the five regions plus the youth. Jessica Alexander- Informed that there is no requirement that it be comprised of that matrix, but they're making best efforts to do this with all of the committees. Paul Fournier- Asked if the committee does end up with six members on the board how will sides be resolved. Jessica Alexander- Stated that the goal would be seven members. <p>With no further discussion the Chair closed this item.</p>
Review and Recommend Changes and/or Additions to the ICH Bylaws	Jessica Alexander, Chair	<p>The Chair recognized Public Comments from:</p> <ul style="list-style-type: none"> Don Smith (Public Comment) <p>The Chair closed Public Comment.</p> <p>The Committee discussed the following recommended changes/edits to the ICH Bylaws.</p> <p>1. Article IV <u>Membership</u>, section A. ICH Membership Composition</p> <p>The ICH membership shall be composed of no more than 19 member-Members.</p> <ol style="list-style-type: none"> Two (2)One (1) member-Members from the San Bernardino County Board of Supervisors or designee; One (1) member-Member from the San Bernardino County Board of Supervisors or designee; City Representative (West Valley Region) City Representative (Central Valley Region) City Representative (East Valley Region) City Representative (Desert Region) City Representative (Mountain Region) Representative from the San Bernardino County Law & Justice Group San Bernardino County Superintendent of Schools or designee Deputy Executive Officer Director of, Community Development & Housing Agency Assistant Executive Officer San Bernardino County of Human Services Representative¹ <p>Footnote: County suggested edit: This member shall represent all agencies in the San Bernardino County Human Services Group and may be filled by an Executive Officer overseeing the San Bernardino County Human Services group or a Director of any of the following San Bernardino County Departments: Aging and Adult Services, Child Support Services, Children and Family Services, Preschool Services, Public Health, Transitional Assistance, and Veteran's Affairs.</p> <ol style="list-style-type: none"> Director of the Department of Behavioral Health Director of the Housing Authority of the County of San Bernardino Homeless Provider Network (West Valley Region) Homeless Provider Network (Central Valley Region) Homeless Provider Network (East Valley Region) Homeless Provider Network (Desert Region) Homeless Provider Network (Mountain Region) Youth With Lived Experience of Homelessness²

Footnote: **With a preference for Transition Aged Youth as recommended by the Youth Advisory Board.**

- Kristin Stevens- Stated that the Children's Network is the main change and where it states may be filled in by an executive officer or director overseeing San Bernardino County Human Services.
- Mike Jones- Asked about the wording on the footnote about the preference for transition aged youth as recommended by the Youth Advisory Board (YAB).
- Paul Fournier- Stated that he wanted to make sure that it meets the HUD requirements as well as the desires of the committee.
- Sharon Green- Stated that she believed that the recommendation was for transition aged youth.
- Jessica Alexander- Stated that number nineteen is just the title Youth with Lived experience of homelessness, and a footnote to clarify that with that position there is a preference for transition aged youth as recommended by the YAB. Mrs. Alexander stated that they wouldn't be bound to that but stating a preference. Mrs. Alexander stated her concern with putting person with lived experience of homelessness and expressing a preference it wouldn't mean that they would be putting a youth there.
- Mike Jones- Stated that they were putting off finishing this document until the governance charter is redone and it will have the recommendations of HUD. Mr. Jones stated they may potentially add a couple of positions to the ICH board which may include somebody with lived experience of homelessness that is not necessarily a youth.
- Jessica Alexander- Stated leaving it as it is changed today and adding as data comes back to the committee about the separation for youth with lived experience and a person with experiences is the way to proceed in the future. Mrs. Alexander informed that the board matrix was sent out last week. Mrs. Alexander asked Dr. Pat Leslie if she already received feedback from the matrixes.
- Pat Leslie- Stated she did receive about six responses back so far.
- Jessica Alexander- Stated that although they agree that they need to add a separate seat for a homeless person with lived experience, they need to let the consultants get the committee through the process before they start adding or taking away seats. Mrs. Alexander stated the main reason is to let the data and the information that is collected to guide them rather than randomly choose.
- Gabriel Fondario- Asked what the age limit is when they are not considered youth anymore.
- Mike Jones- Informed the age is twenty-five.
- Sophie Curtis- Asked if the committee wanted to add a youth member to the list and if it beneficial for the HUD application.
- Pat Leslie- Answered that it would help with the HUD application.
- Mike Jones- Suggested persons or individual with lived experience to cover both.
- Sophie Curtis- Stated she would defer to Dr. Leslie, but it seems like if they are describing the membership of the ICH in the paragraph and omitting youth and then have it in the back, it wouldn't be harmful to reiterate it.
- Pat Leslie- Stated that what HUD is looking for is to ensure that the structure includes youths, particularly the YAB so that is why they had recommended that the YAB be the point of reference or recommendation for the youth. Dr. Leslie stated that the youth seat clearly spells out as part of the structure is what HUD is looking for.

The Committee discussed the following recommended changes/edits to the ICH Bylaws.

1. Article IV Membership, section B. Membership Application and Approval Process

~~The ICH will establish an ad hoc Application Review Committee as needed to review applications and develop a screening process. The Application Review Committee~~ Applications for ICH membership shall be reviewed by the Bylaws and Membership Committee within ~~two (2) weeks~~ thirty (30) days of receipt the application due date. The Bylaws and Membership Committee will recommend candidates for appointment to the ICH at the next regular ICH meeting after reviewing following the Bylaws and Membership Committee's the review of the applications. ~~The~~ OHS shall prepare a synopsis of the recommended applicant's qualifications for the ICH. OHS shall forward the recommendations and synopses to the ICH ~~no later than two (2) weeks~~ prior to the next regularly scheduled ICH meeting at which the approval of new ~~member~~ Members will occur.

- Paul Fournier-Asked is there any way of changing the verbiage of the Bylaws and membership committee meet within thirty days of the application due date.
- Sophie Curtis-Stated they are synonyms and would refer to the committee.
- Paul Fournier- Stated it could be within thirty days following the application due date.

3. Article IV Membership, section D. Membership Responsibilities

All Designated Members are expected to attend all ICH meetings. Except for the HPN Regional Committee Chair ~~AA~~Alternate Members shall not attend more than three (3) regularly scheduled ICH meetings each calendar year without Chair approval. ~~The Chair may approve Alternate Member attendance at more than three (3) regularly scheduled ICH meetings in a calendar year in the following instances: Designated Member illness, illness of immediate family member of a Designated Member, or other documented emergency circumstances in which regular attendance is rendered infeasible.~~ Designated Member absences will be noted in the minutes. O Designated Member responsibilities may include:

- Paul Fournier- Requested clarification on why the HPN regional committee was excluded.
- Jessica Alexander-Stated that the alternates in that case would automatically serve, because they already had a back up plan if they couldn't make it.
- Sophie Curtis- Stated that on page thirteen, the language was changed to specified, should a vacancy occur in an HPN regional committee chair position, the alternate member defined below shall represent the region until a new chair is elected by the regional membership. Mrs. Curtis stated that the thought was that the three-meeting rule might not be feasible or might not work well for the HPN committees.
- Jessica Alexander-Stated she thinks that it should be removed.

3. Article IV Membership, section B. Membership Vacancies

~~The ICH will establish an ad hoc Application Review Committee as needed to review applications and develop a screening process. The Application Review Committee~~ Applications for ICH membership shall be reviewed by the Bylaws and Membership Committee within ~~two (2) weeks~~ thirty (30) days of receipt the application due date. The Bylaws and Membership Committee will recommend candidates for appointment to the ICH at the next regular ICH meeting after reviewing following the Bylaws and Membership Committee's the review of the applications. ~~The~~ OHS shall prepare a synopsis of the recommended applicant's qualifications for the ICH. OHS shall forward the recommendations and synopses to the ICH ~~no later than two (2) weeks~~ prior to

		<p><u>the next regularly scheduled ICH meeting at which the approval of new memberMembers will occur.</u></p> <ul style="list-style-type: none"> • Jessica Alexander- Stated there was a question or change about assignment versus appointment. Mrs. Alexander stated it depends on who the member is because if it were a city, it would go back to the City Select Committee and if it was youth then it would go back to this committee. • Sophie Curtis- Asked if the City Select process contemplate a declared vacancy in that position or can the chair choose. • Jessica Alexander- Stated that there are not any procedures for that right now and if the city resigned it would go back to the City Select Committee. Mrs. Alexander stated it would be a vacancy after three meetings. • Kristen Stevens- Asked it would be after three meetings and haven't received a response within thirty days. • Jessica Alexander- Stated it goes to the City Select Committee first and then if they decide not to appoint someone, then it goes to the member at large and then the group would review that. • Kristen Stevens- Stated the City Select Committee will call a special meeting if they need to fill a seat. • Jessica Alexander- Asked Sophie Curtis that because it is still an approval process, how should they proceed or what recommendation should be made. • Sophie Curtis- Read the proposed line as, "If the chair does not receive a written response within thirty calendar days, then the chair may ask that new designated member be approved pursuant to article 4a or B above as applicable. • Gabriel Fondario- Asked if criteria can be defined as youth from age eighteen to twenty-four. • Sophie Curtis- Stated that it would be done through the committee section of the governance charter, which will be discussed in the rules and procedures. • Jessica Alexander- Asked Sophie Curtis if with small changes can it be brought to ICH or do they need another meeting. • Sophie Curtis- Stated she has all the feedback and proposed changes so it would be up to the committee to vote today. <p>The Chair asked for a motion to accept the changes and make these recommendations to the ICH board for approval.</p> <p>Mike Jones made a motion and was second by Sharon Green.</p> <ul style="list-style-type: none"> • A vote was taken: 5 members were in favor: Jessica Alexander, Paul Fournier, Mike Jones, Gabriel Fondario and Sharon Green • 0 members were opposed. <p>The motion was approved.</p> <p>With no further discussion the Chair closed this item.</p>
Review and Recommend Changes and/or Additions to the ICH Rules & Procedures	Jessica Alexander, Chair	<p>The Chair stated that the Rules and Procedures will not be on the ICH agenda this month and another meeting will be necessary to complete it, but the committee will begin to work on it at this meeting.</p> <p>The Chair recognized Public Comments from:</p> <ul style="list-style-type: none"> • Don Smith (Public Comment) <p>The Chair closed Public Comment.</p>

STRUCTURE

Standing cCommittee meetings shall be conducted in accordance with the Brown Act.- ~~All Standing committee meetings shall have an agendas that will~~shall be posted on the San Bernardino County Homeless Partnership website in advance of the meeting.

All Standing Ceommittees will have a designated time on the agenda for public comment. If ~~the a standing or ad hoc~~ committee wishes to solicit additional input it should schedule a specific time and notify all stakeholders of that opportunity. ~~Seating for the public will be provided in an area of the meeting room that is distinct from that of the committee members-~~ Standing and ad hoc committees shall create and maintain a A-meeting summary should be kept to the extentto necessary to record important discussions and decisions made. All motions must be recorded, including the persons making and seconding the motion and the outcome of the vote.

If a standing or ad hoc committee wishes to request a meeting that is not regularly scheduled, ~~thate~~ committee chair must consult with OHS staff on room availability and support staff. Meeting notices shall be distributed through OHS.

- Jessica Alexander- Stated that if anyone has changes for the committee to consider it would be helpful to submit them before the meeting. Mrs. Alexander asked Sophie Curtis to go through the changes and recommendations.
- Sophie Curtis- Stated that the baseline changes was to better distinguish the difference between standing and ad hoc committees. Mrs. Curtis stated that under duties and responsibilities the ICH standing space shall have the power, duty, and responsibility to is because the ad hoc committees have duties and responsibilities that are assigned by the chair or by the ICH. Mrs. Curtis stated that the committee rules and procedures won't necessarily call out the duties and responsibilities because they change on an ad hoc basis. Mrs. Curtis stated that standing committees shall be conducted in accordance with the Brown Act. Mrs. Curtis stated she struck seating for the public will be provided in an area of the meeting room from that of the committee members is because now that we're doing a hybrid approach, she didn't want it to require the committees to provide a specific meeting space in the room fir the public if they are allowed to participate virtually.
- Paul Fournier-Asked if there were a controversial topic what could be foreseen going wrong in a situation like that.
- Sophie Curtis- Stated the Brown Act requires that there will be seating provided and attendance can be made virtually which will provide the public the opportunity to observe the meeting and participate in the meeting. Mrs. Curtis stated that even with a controversial topic the meeting will still be held to the Brown Act where the public can observe the meeting and provide public comment.
- Jessica Alexander-Stated that when there is an issue that may draw more attendance there is work done at the planning level to make sure the right size room is available to accommodate as many people as possible.
- Sophie Curtis- Stated she removed the term discretionary special ad hocs because it doesn't make a difference because they are not referenced in the Brown Act. Mrs. Curtis stated the use of the term discretionary or special didn't have a legal distinction. Mrs. Curtis informed that she added Grant Review Committee because that was an action that was taken by the ICH. Mrs. Curtis suggested that adding sections would be helpful for referencing purposes.
- Jessica Alexander- Stated that she is not aware of the purpose of some of the standing committees.

		<ul style="list-style-type: none"> • Sophie Curtis- Asked if part of the CoC governance review process is going through the list of the committees and identifying those that are required. • Dr. Pat Leslie- Stated that part of the governance review process will be to look at the standing and ad hoc committees. • Jessica Alexander- Stated that the Outreach and CES Committee was given an oversight element which expanded the roles of that committee that was created by the ICH resolution that was approved back in February. Mrs. Alexander suggested that the name of the committee should probably change as a result of the responsibilities that were added. Mrs. Alexander stated there was discussion at the committee level about if they should also take on the role of oversight for HMIS because it's all in the data. Mrs. Alexander stated she thinks there should be two separate committees, one for outreach and one for oversight. Mrs. Alexander stated that with recommendations given to Dr. Pat Leslie the committee can separate the committees they don't need and engage people from the CoC to be on the committee. • Mike Jones-Asked if there is a difference between Youth Advisory Board (YAB) and Homeless Youth Task Force. • Jessica Alexander- Stated she spoke with Brenda Dowdy about the Homeless Youth Task Force and it about departments getting together that serve youth to discuss how they can better serve the youth, but the YAB is the youth which is talking and making decisions for themselves. Mrs. Alexander stated each committee should have outcomes and goals. • Paul Fournier-Stated on the emergency preparedness he would like to see something about assurance of resources. • Mike Jones- Stated that maybe homework should be done on what kind of committees should exist and with Dr. Leslie's help look at some CoCs nationally for reference. • Jessica Alexander-Stated that there have been suggestions that the standing committees need to be limited to the business committees that need to meet in person. • Mike Jones- Stated we need to have committees that are impactful so with Dr. Leslie's help the committee can clean up the list. • Jessica Alexander- Stated that the committee needs to address the Grant Review Committee. • Sharon Green-Stated the recommendation of having a Grant Review Committee was because they were looking at funds being taken and there wasn't any oversight or correction process to help people get to where they need to be with funding. Mrs. Green stated the commit was to follow up with organization that had been designated funding and make sure that they were in alignment with the funding. • Jessica Alexander- Stated that committee should meet at least twice a year and provide technical assistance to the CoC organizations that received HUD funding through the CoC competition. • Mike Jones- Stated the Maricopa's CoC Grant Review Committees responsibilities are to rank and review committee funding committee and ensures that objective review of performance metrics and seeks to maximize head COC funding through rating and review projects recommended for funding. Mr. Jones stated they also analyze the CSC portfolio of interventions to restructure resources and order to meet regional needs and provide those recommendations to the board meets intermittently when the notice of funding opportunity is being prepared. • Paul Fournier- Asked if that is additional or replacement of what is already written for the Grant Review Committee. • Jessica Alexander-Stated it would be additional. • Kristen Stevens- Asked when it states provide technical assistance, are the committees providing the assistance or providing them the link to the HUD technical assistance to provide technical support. • Jessica Alexander- Stated the consultants should be at the review meeting or sending it to consultants to get that assistance. Mrs. Alexander stated that the resources need to be given to them. • Paul Fournier- Asked about the funding that comes from state versus federal. • Jessica Alexander- Stated there is a different process which the regions decide where the money goes. Mrs. Alexander stated that HHAP is supposed to be more of a community process to make decisions regionally with the CoC money. • Pat Leslie- Stated in the regulations the CoC is responsible for reviewing the performance of all the projects that are
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		<p>submitted under the regional application even if they're direct to the different grantee and take action against poor performers. Dr. Leslie state that there is a much different requirement from HUD for the CoC rating and review process of the applicants of the CoC competitive grant, but it does have language about the CoC's oversight and responsibility as well.</p> <ul style="list-style-type: none"> • Sophie Curtis- Stated she was wondering on the timing of this because they are going to need Dr. Leslie's assistance on drafting the scope of the Grant Review Committee. • Jessica Alexander- Asked if there is anything urgent that they couldn't wait for. • Sophie Curtis- Stated her only fundamental change would be to change the definition of quorum. Mrs. Curtis stated that was the one legal issue and everything else on her side was cleanup. Mrs. Curtis referenced page thirty and stated previously a quorum was defined as one third of total committee members. Mrs. Curtis stated that for public entities that are subject to the Brown Act, the Brown Act is only going to trigger when there is a majority of committee members present therefore a quorum can only exist when there is a majority of committee members present. Mrs. Curtis suggested that they revise a quorum consistent with the Brown Act to constitute a majority of total committee members. • Paul Fournier- Asked if the majority is fifty percent plus one. • Sophie Curtis- Confirmed yes. • Jessica Alexander- Asked if they could make that change and implement it right now and work on the rest later. • Sophie Curtis- Stated it is not critical as long as the meetings are in accordance with that requirement. • Jessica Alexander- Recommended that a motion to refer this all to Dr. Leslie to bring back once she integrates it into her process. <p>The Chair asked for a motion to refer the rules and procedures to the consultants and the ad hoc governance committee work on.</p> <p>Mike Jones made a motion and was second by Sharon Green.</p> <ul style="list-style-type: none"> • A vote was taken: 5 members were in favor: Jessica Alexander, Paul Fournier, Mike Jones, Gabriel Fondario and Sharon Green • 0 members were opposed. <p>The motion was approved.</p> <ul style="list-style-type: none"> • Paul Fournier- Asked what is the right to complain. • Sophie Curtis- Stated she does not know what that means. Mrs. Curtis stated the public has the right to file a notice that there was a failure to comply with the Brown Act. Mrs. Curtis stated there was no description of what happens once the committee gets a complaint. • Jessica Alexander- Stated that complaints should go to the ICH and not a committee. • Paul Fournier- Stated he doesn't want the right to complain disappear. • Sophie Curtis- Stated there is still a grievance form in the governance document that will be filed with OHS, but she just doesn't think it needs to be in the committee document. • Sharon Green- Stated that grievances and complaints should probably remain with the ICH. • Jessica Alexander- Stated the ICH ultimately has the oversight of the committees. • Sophie Curtis- Stated to address the concern it can say that complaints may be filed in writing or presented verbally to the ICH to the process that's referenced otherwise in the governance charter. • Jessica Alexander- Thanked Sophie Curtis for her help and attention to the matters, Kristin Stevens for bringing forward the changes and suggestions by the County of San Bernardino, Dr. Pat Leslie for looking at the Bylaws and making
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		<p>comments, Don Smith for participating and for bringing recommendations and changes, and everyone for their time.</p> <p>With no further discussion the Chair closed this item.</p>
Set date, time, location for the next Bylaws and Membership Committee meeting.	Jessica Alexander, Chair	<p>Chair opened item for discussion:</p> <ul style="list-style-type: none"> Committee members discussed having a meeting in August. Dr. Pat Leslie- Stated that August seems like an appropriate time for governance to bid the governance ad hoc committee to give the committee their feedback. <p>The Chair requested that a motion be made to set the date of August 28, 2023, at 10:30 am for the next Bylaws and Membership Committee meeting with the assistance of OHS to secure a location.</p> <ul style="list-style-type: none"> A vote was taken: 5 members were in favor: Jessica Alexander, Paul Fournier, Mike Jones, Gabriel Fondario and Sharon Green 0 members were opposed. <p>The motion was approved.</p> <p>With no further discussion the Chair closed this item.</p>
COMMITTEE ROUNDTABLE	PRESENTER	
	Jessica Alexander, Chair	<p>The Chair opened the floor for comment to the Committee Members.</p> <p>With no further business, chair closed roundtable.</p>
Adjournment		<ul style="list-style-type: none"> Being no further business, the meeting was adjourned at 12:04 p.m.
Next Meeting		<p>The next Bylaws & Membership Committee Special Meeting will be held on:</p> <p style="text-align: center;"><u>Monday, August 28, 2023</u> <u>10:30 am – 12:00 pm</u> <u>Address: Program Development Division (Conference Room B)</u> <u>825 E. Hospitality Lane, San Bernardino, CA 92415</u></p>

Office of Homeless Services
560 E. Hospitality Lane, Suite 200 • San Bernardino, CA 92408
Phone: (909) 501-0610 • Fax: (909) 501-0622
Email: homelessrfp@hss.sbcounty.gov • Website: <https://sbchp.sbcounty.gov/>

Attendees on June 1, 2023 • Interagency Council on Homelessness – ByLaws & Membership Committee Meeting				
LAST NAME	FIRST NAME	ORGANIZATION	PHONE NUMBER	EMAIL
ALEXANDER	DIANA	ICH Assistant Executive Officer		diana.alexander@cao.sbcounty.gov
ALEXANDER	JESSICA	Operation Grace	909-382-8540	pastoriessicaalexander@gmail.com

CURTIS	SOPHIE	ICH Counsel		
FOURNIER	PAUL	Mountain Homeless Coalition		paul.fournier@lsssc.org
GREEN	SHARON	Victor Valley Family Resource Center	760-669-0300	sgreen@vvfrc.com
LESLIE	PAT	Governance Ad Hoc Committee- Consultant		lesliepat606@gmail.com
JONES	MIKE	Deputy Sheriff HOPE Team		mjones@sbcasd.org
STEVENS	KRISTIN	Office of Homeless Services	909-501-0644	kristin.stevens@hss.sbcounty.gov

Please note we do not list attendance of members of the public that joined

Grievance Form

Instructions:

If you have a complaint/grievance that you would like to file regarding the violation of the ICH Governance Charter Code of Conduct or Conflict of Interest please complete the following form. The complaint/grievance will be investigated and a response will be provided within 20 business days of Bylaws and Membership Committee's final decision.

Name of Person Making Complaint:	Sharon Green	Date of event(s):	7/14/2025
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Statement of Complaint – Please provide details of the situation and complaint including any of the specific dates of appointment, conversations or actions involved by the Member of the Interagency Council on Homelessness (ICH). (If more space is needed, continue to the back of the form or attach another document.)
I am writing to formally express my concerns regarding the current actions and governance structure of our Continuum of Care (CoC) Board. In accordance with our Governance Charter, matters of this nature should be addressed to the CoC Chair. However, at this time, there is no duly elected Chair, Vice-Chair, or Secretary—positions that are required to be filled through a vote of the full CoC membership. This absence of elected leadership raises serious concerns about transparency, accountability, and compliance with the Governance Charter. I respectfully request that immediate steps be taken to address this leadership gap and ensure that the CoC operates in accordance with its established policies and procedures.

May we contact you for further information? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

If yes, please provide contact information:			
a. Primary Phone Number (if available)			
b. Email Address (if available)			
c. Address (if available)			
d. Secondary Phone Number			
What is the best method to contact you? <input checked="" type="checkbox"/> Phone Call <input type="checkbox"/> Text <input type="checkbox"/> Email			
Signature of Person Making Complaint:	<i>Dr. Sharon Green</i>	Date:	7/29/2025

This form can be submitted to Joy Woodard, Office of Homeless Services Executive Administrative Assistant

- a. Email to: ohs@hss.sbcounty.gov
- b. Mail to: Office of Homeless Services, 560 E. Hospitality Lane Suite 200, San Bernardino, CA 92408-0044

Grievance Form

Instructions:

If you have a complaint/grievance that you would like to file regarding the violation of the ICH Governance Charter Code of Conduct or Conflict of Interest please complete the following form. The complaint/grievance will be investigated and a response will be provided within 20 business days of Bylaws and Membership Committee's final decision.

Name of Person Making Complaint:	Sharon Green	Date of event(s):	8-4-2025
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Statement of Complaint – Please provide details of the situation and complaint including any of the specific dates of appointment, conversations or actions involved by the Member of the Interagency Council on Homelessness (ICH). (If more space is needed, continue to the back of the form or attach another document.)
I am submitting this formal grievance to address the actions of the CoC Board Chair, Mr. Baca, who unilaterally rescinded Victor Valley Family Resource Center's (VVFRC) HHAP-3 funding award. This decision was made without placing VVFRC's request to amend our Scope of Work on the CoC Board agenda, as recommended by the High Desert Regional Steering Committee and in accordance with procedures outlined in the CoC Governance Charter. VVFRC made every effort to comply with the requirements and expectations communicated by the Office of Homelessness, including grant conditions under HHAP-3 and formal directives issued by the Community Development Department (CDH). The Board Chair's failure to follow the prescribed process undermines the governance framework established to ensure fairness, transparency, and regional input. While I initially submitted a version of this complaint on July 15, 2025, I acknowledge it was not filed on the official grievance form. Furthermore, as this complaint concerns the conduct of the Board Chair, the Governance Charter stipulates that such grievances must be submitted to the Vice Chair, not the Chair. I now recognize that sending the initial grievance directly to Chair Baca may have exposed VVFRC to retaliation or other adverse consequences. For your review and consideration, I have attached the original grievance dated July 15, 2025, which details our concerns regarding the Chair's actions and the resulting harm to VVFRC's standing and funding. I have attached the original grievance dated July 15, 2025, which details our concerns regarding the Chair's actions and the resulting harm to VVFRC's standing and funding.

May we contact you for further information? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

If yes, please provide contact information:			
a. Primary Phone Number (if available)			
b. Email Address (if available)			
c. Address (if available)			
d. Secondary Phone Number			
What is the best method to contact you? <input checked="" type="checkbox"/> Phone Call <input type="checkbox"/> Text <input type="checkbox"/> Email			
Signature of Person Making Complaint:	Dr. Sharon Green	Date:	8/4/2025

This form can be submitted to Joy Woodard, Office of Homeless Services Executive Administrative Assistant

- a. Email to: ohs@hss.sbcounty.gov
- b. Mail to: Office of Homeless Services, 560 E. Hospitality Lane Suite 200, San Bernardino, CA 92408-0044



DESERT RSC CO-CHAIR UPDATE

July 2025



Regional Steering Committee - Governance Charter

Governance Charter – Chapter 8 – page 8 of 11

Regional Steering Committees (RSC) are regionally-based committees that advise the CoC Membership and Board. These committees are constituted by the organizations in their respective areas, and function as subcommittees to the CoC.

Role and Functions

Regional Steering Committees are able to provide leadership and serve as a regional advisory body to the CoC through a selected regional liaison to the CoC Board. Although governed externally, RSCs assist the CoC by:

- Setting regional priorities, goals, and action steps as adopted by the CoC.
- Facilitating regional alignment of resources and service coordination.
- Coordinating regional participation in CoC activities.
- Engaging a broad range of public and private stakeholders in regional planning and coordinated service delivery.
- Providing project funding priorities and recommendations to regionally fund resources, based on a project prioritization process.
- Facilitating alignment across the CoC as a whole for coordinating, planning, and investment.



High Desert HHAP-3 Reallocation Recommendation

Timeline for a contingency plan regarding HHAP 3 funding:

- June 3 at 11:20 – phone call regarding adding a discussion item to the June agenda for a contingency plan
- June 6 – email received regarding the contingency plan
- June 10 - Response sent
- June 10 - Desert meeting – no quorum attained
- June 11 – call to see if a special meeting could be scheduled
- June 17 – Desert special meeting



High Desert HHAP-3 Reallocation Recommendation

On June 17, 2025, the High Desert Regional Steering Committee held a special meeting to create a contingency plan for the HHAP-3 funds in the event they were reallocated back to the High Desert Region. The Committee passed a motion to evenly distribute any reallocated funds among the three previously awarded HHAP-3 agencies in the region:

1. Family Assistance Program
2. Desert Manna
3. Growing Outreach, Growing Opportunities (GOGO)

Each agency went through an HMIS data analysis and a HHAP 3 claims review

Next Steps: contract modifications



High Desert - HHAP 4

A High Desert Agency was awarded \$359,693.00 in HHAP-4 funding. A contract for this award was scheduled to be presented to the San Bernardino County Board of Supervisors for approval on February 25, 2025.

However, on February 20, 2025, OHS was notified that counsel for the agency required additional time to review the contract. As a result, the contract was pulled from the February 25, 2025 Board Agenda Item.

OHS received the initial draft of the requested contract modifications from the agency on April 9, 2025. The first round of review by San Bernardino County Counsel and Risk Management was completed on April 21, 2025, and the feedback was shared with agency's counsel.

Contract negotiations and reviews continued through May. OHS is currently awaiting final departmental approval to accept the revisions proposed. The specific revision requests from the agency are as follows:

- **G.1 – Indemnification:** Requested narrowed indemnification language. *Pending approval.*
- **G.2 – Additional Insured:** *Accepted.*
- **G.3 – Waiver of Subrogation:** *Accepted.*
- **G.4 – Primary & Non-Contributory:** *Accepted.*
- **G.5 – Severability of Interests:** Requested removal. *Pending approval.*
- **G.11.7 – Cyber Insurance:** Requested removal. *Pending approval.*



High Desert - RSC Meeting Logistics

Agenda and minutes – templates have been provided for use

- Agenda and minutes are due 1 week prior to the meeting – sooner if possible
 - Goal is to send out the agenda 1 week prior to the meeting
 - OHS will review agenda formatting and make recommendations
 - OHS will post on the SBCHP website and send out to the CoC
 - HD RSC will post on building
- Supporting Documentation - presentations etc.
 - Should be sent together with agenda and minutes for the agenda packet
- Monthly planning meetings
 - We can schedule monthly meetings or as needed by RSC co-chairs
 - OHS is available for support





THANK YOU/QUESTIONS?



www.SBCounty.gov

San Bernardino County CoC: Gaps and Needs Analysis

<i>Introduction</i>	<i>1</i>
<i>Methodology.....</i>	<i>1</i>
<i>Strengths and Gaps by Region</i>	<i>2</i>
<i>Central Valley Region</i>	<i>2</i>
<i>Desert Region.....</i>	<i>3</i>
<i>East Desert Region.....</i>	<i>5</i>
<i>Mountain Region.....</i>	<i>6</i>
<i>West Valley Region.....</i>	<i>7</i>
<i>CoC and Systemwide Findings</i>	<i>8</i>
<i>Next Steps</i>	<i>12</i>

Introduction

San Bernardino County’s geography, diverse populations, and significant disparities in access to housing and services require a tailored, regionalized approach to ending homelessness, with support from the County and the Continuum of Care (CoC). This Gaps and Needs Analysis synthesizes data and insights from regional focus groups and other stakeholders to guide a countywide plan for the CoC that recognizes the unique strengths and needs of its various regions.

Methodology

Homebase completed an environmental scan of the CoC by reviewing policies, procedures, bylaws, previous strategic plans and action plans, and other publicly available documents related to homelessness in San Bernardino, including:

- Interagency Council on Homelessness (ICH) Bylaws
- San Bernardino County Consolidated Plan and Analysis of Impediments Project (2019)
- San Bernardino Homeless Action Plan: A Multi-Jurisdiction Approach (2019)
- Homeless Strategic Action Plan: Homeless to Home (2022)
- Housing Authority of the County of San Bernardino (HACSB) Annual Plans

Homebase collected data from the CoC and other publicly available sources from January through April 2025 to identify key needs and issues in San Bernardino County, including:

San Bernardino County CoC: Gaps and Needs Analysis (June 2025)

- Point-in-Time Count (PITC) (2018-2024)
- Housing Inventory Count (HIC) (2018-2024)
- System Performance Measures (SPMs) (FY 2024)
- General Census data from the American Community Survey (2023-2024)
- Comprehensive Housing Affordability Strategy (CHAS) data (2017-2021)
- Homeless Data Integration System (HDIS) (2023-2024)
- HDX Competition Data (2019-2024)

Homebase held in-person focus groups and listening sessions across San Bernardino County in May 2025, including at a CoC-wide meeting and in each of the five CoC regions: Central Valley, Desert, East Desert, Mountain, and West Valley.

Strengths and Gaps by Region

Given the enormous geography and diversity of San Bernardino County, in their 2019 Homeless Action Plan, the County recommended five distinct Regions to function as Service Planning Areas within the CoC: the Central Valley, Desert or High Desert, East Desert, Mountain and West Valley. The 5-region model is also used at the ICH, the CoC Board for San Bernardino County, where service providers may operate throughout the County, but designate one region as their primary service area for CoC governance purposes. To further empower each region to coordinate, advocate and strategize at a local level, five Regional Steering Committees (RSCs) were formed to operate as regional decision-making bodies within the CoC.

This analysis relies on the same regional framing to collect, analyze and present data. We begin with an analysis of each of the regions to capture their unique strengths, resources, gaps and needs. This information is then aggregated and analyzed to make CoC-wide findings.

Central Valley Region

The Central Valley region includes many of the county's most urban and suburban parts, including cities such as San Bernardino, Fontana and Redlands. The area is the population and service hub of the county and contains a high concentration of shelter services, health care facilities, and outreach programs. The region faces a massive housing affordability crisis, especially as people from nearby counties, like Los Angeles, get priced out of their local housing markets.

Strengths

Long-standing provider collaboration: Providers in the Central Valley region have long-standing working relationships, regular communication, and a shared willingness to assist one another across organizational lines. Frontline workers such as social workers and case managers are proactive and resourceful in supporting clients.

Increased client readiness for services: Clients in the region are increasingly motivated and ready to engage with services.

Early success leveraging CalAIM: Central Valley providers, including Inland Housing Solutions, have reported success leveraging CalAIM resources such as Enhanced Care Management and Community Supports to secure housing and health services.

Growing HMIS adoption: While still a bit uneven, several participants noted that regionally the Central Valley has experienced greater buy-in and more universal use of HMIS by its providers. This results in better data quality, which in turn allows the region to more accurately assess and address its needs.

Strong frontline staff: Providers credited frontline workers, including social workers and case managers, with being proactive and resourceful in supporting clients.

Opportunities

Shortage of affordable housing: Severe lack of affordable housing in the region, with long waitlists, income requirements at 2 or 3 times rent, and barriers that make it extremely difficult to secure units even when resources are available.

Rigid eligibility and funding definitions: Harmful gaps and inefficiencies result from overly narrow funding definitions that prevent services from overlapping — families who need multiple supports simultaneously sometimes cannot access them due to policies and concerns about “double-dipping.”

Staffing shortages and training needs: Participants described insufficient staffing capacity, with many local organizations struggling to sustain outreach, data entry, and follow through with adequate infrastructure and support. Providers also reported a lack of built-in systems to help frontline workers or clients troubleshoot and navigate barriers.

Coordinated Entry System (CES) functionality and cross-system coordination challenges: There are barriers to access for underserved groups such as single fathers with children, neurodiverse clients, and foster youth who are aging out of care. CES participants also described a lack of coordination across programs and funding streams, which makes the entire system less effective. Participants stressed the need for CES staff to receive additional training to understand the system and engage effectively with clients. They also recommended that local cities need additional support to troubleshoot their local access issues.

Lack of problem-solving supports: While frontline staff were praised for their resourcefulness and commitment, participants also stressed the importance of developing built-in systems to help these workers troubleshoot and navigate barriers with clients.

Desert Region

The Desert Region, or the High Desert, covers an expansive, largely rural area that also includes cities like Victorville, Barstow, Apple Valley, and Hesperia. Over recent years the population has grown, especially to the region’s more urban parts. The area experiences extreme temperatures and has limited water resources, which presents extreme challenges for people experiencing housing instability and homelessness. The expansiveness of the region also leads to access issues to health care, behavioral health services, housing and other supportive services, especially in its more rural and isolated parts. The High Desert’s vast geography requires mobile and flexible outreach, which local providers do not have the capacity or staff to fully resource.

Strengths

Deep culture of trust and collaboration: “Everyone knows and likes each other.” Participants emphasized how longstanding relationships allow agencies to “just call each other” and resolve issues in real time, even without formal agreements. There’s a willingness among providers to work together to find solutions, and a shared understanding that collaboration — not competition — is what strengthens the region’s ability to respond.

CoC-wide coordination: Stakeholders recognized the value in working “across the entire county at the same time,” with alignment across regions as a major step forward from the past. Participants appreciated that CoC leadership is more consistently engaging with regional partners and creating space for Desert-specific feedback.

Food system infrastructure: The “great food collaborative,” particularly High Desert Second Chance, was praised for keeping people fed during COVID and beyond. Schools have also stepped up in this space, ensuring that food insecurity doesn’t push more people into crisis. Coordination between schools and community organizations was described as “one of the best in the county.”

Homeless Wellness Center in Victorville: The 170-bed shelter is viewed as a flagship investment that provides wraparound support for clients, in addition to beds. The Center can house people for up to 6 months while they stabilize and prepare for permanent housing and plays a central role in the region’s service landscape. Participants expressed hope that this model could be expanded in other parts of the Desert Region, and across the CoC.

Expungement and Shelter Court: Over 160 tickets have been expunged via this special court, which has had a significant impact for participants facing legal barriers to housing. This relief was described as “life-changing” in focus groups for people who were previously locked out of services.

Opportunities

Service gaps for youth homelessness, trafficking risks and behavioral health: Young people are vulnerable to trafficking and exploitation; outreach teams struggle to help them stay healthy and stable due to ongoing distractions and unsafe environments. Youth remain one of the hardest populations to engage and stabilize. There are no detox or stabilization options locally, and the lack of behavioral health infrastructure leaves both youth and adults without appropriate care. Participants flagged lack of behavioral health services as one of the most urgent gaps in the region. Additionally, there are no LPS-certified hospitals in the region and the 5150 process involves long-distance transport to providers outside the region. AMR response times can take two to three hours. The behavioral health services that are available are siloed and poorly integrated into the homeless response system.

Loss of family shelter capacity: A regional family shelter was repurposed to serve TAY during COVID and has not been replaced, leaving a significant gap in options for families with children experiencing homelessness.

Permanent supportive housing (PSH) bottlenecks: Desert Haven is the only PSH provider in the region and operates just 31 units. Clients are often stuck in shelter for over a year due to the lack of next-step housing, especially those with high behavioral health or medical needs.

Housing costs are far too high, and employment opportunities are low: Even in areas considered “more affordable,” local income levels are often too low to support rent without ongoing subsidy. Without access to long-term, gainful employment, residents struggle to maintain housing.

Transportation and utility cost burden contribute to the high cost of living: Even if rent is affordable, high utility costs create ongoing instability, which participants repeatedly mentioned as a driver of housing loss. Additionally, the current bus system is limited, preventing residents from being able to reliably access services, employment, or supportive spaces. Barstow and Needles were named as areas with limited coordination and fewer provider networks compared to Adelanto or Victorville.

East Desert Region

The East Desert, which stretches to the Arizona border, contains Joshua Tree National Park and is comprised of smaller, more remote communities like Twentynine Palms, Joshua Tree, and Yucca Valley. The region faces extreme geographic and resource challenges, which providers sometimes feel is compounded by the County and CoC's lack of understanding and presence in the area. The East Desert lacks sufficient shelters, behavioral health infrastructure, and services. Homelessness in the area is impacted by extreme weather, transportation deserts, and areas of extreme isolation, which make regional collaboration and mobile service delivery critical. These issues are further compounded by the region's booming short-term rental market, which has led to a plummet in housing for long-term rentals, and a sharp increase in the cost to buy a home.

Strengths

Longstanding coordination among nonprofits: Providers have sustained decades-long partnerships and a collaborative culture, often without significant County involvement. The deep trust facilitates informal referrals and resource sharing.

Strong faith-based and volunteer infrastructure: Churches and local volunteers are deeply embedded in service provision, especially in cities like Needles, providing meals, hygiene support, and emergency shelter. While these service providers are meeting the needs of vulnerable people in the community, many are not in HMIS or CES, but through light-touch engagement they could be brought more formally into the regional system.

Ability to "stretch" limited resources: Providers in the East Desert described the region as "scrappy" and highly adaptive — able to do more with less due to necessity and longstanding relationships.

Availability of land: While there is a severe shortage of housing in the region, there is also a surplus of available land. These areas could be developed using modular construction or prefabricated units to provide inexpensive housing for people experiencing homelessness and housing instability.

Opportunities to build on cross-jurisdictional and tribal collaboration: While the East Desert is remote from other parts of San Bernardino, parts of the region have proximity to service hubs in Riverside County, tribal nations, and national parks. This unique geography presents the area with opportunity to coordinate with neighboring jurisdictions in novel and creative ways. Some providers have already successfully partnered with tribal governments and out-of-county institutions to supplement local gaps.

Opportunities

Inadequate behavioral health and shelter infrastructure: Providers reported no local detox or inpatient behavioral health options and described sobering centers as too far to access. There is no local emergency shelter for most subpopulations.

Need for both shelters and transitional housing: There is a lack of available housing in the East Desert period, which was compounded by COVID-19 and the short-term rental market. In particular, participants named a gap in "middle options" that support people for longer than an overnight stay but that are not permanent housing placements.

The region's geographic isolation leads to access and service issues: Extreme travel distances between cities make regional coordination difficult and reduce access to centralized County services. East Desert lacks a meaningful CES presence, making client matching, housing navigation, and service coordination inconsistent and often siloed. This isolation also makes staff retention very difficult, as staff burnout and workforce instability are pronounced across the region. Many providers juggle multiple roles, drive

extensive distances between client, and lack adequate administrative or clinical support and staff often feel unsupported or unheard by the boarder CoC and County systems.

Limited County engagement and support: Participants consistently reported minimal County visibility, with some cities receiving little to no communication or funding despite documented need.

Climate, transportation, and technology barriers: High heat, flooding, and long travel distances without public transit all increase vulnerability and make client follow-up difficult. Data accuracy is severely compromised by the region's expansive geography, limited outreach staffing, fear of enforcement among unhoused residents, and inaccessible or off-grid locations. Some stakeholders noted that unsheltered individuals intentionally avoid being counted due to past negative experiences. Limited access to technology and broadband restricts both client participation in virtual services (e.g., telehealth, remote CES assessments) and provider coordination across the region, which impacts clients disproportionately in remote areas and organizations that do not have tech infrastructure.

Mountain Region

The Mountain Region is made up of the San Bernardino Mountains and its communities, such as Big Bear Lake, Lake Arrowhead, and Running Springs. It is a popular year-round tourist destination where many of the properties are either vacation homes or, increasingly, short-term rentals. The area has a relatively small population of people experiencing homelessness, who are dispersed throughout the geography. Transportation to and from the area is extremely limited, making access difficult, especially during winter storms or wildfire threats.

Strengths

Deep community knowledge and personal commitment from providers: Mountain participants highlighted the deep personal commitment from frontline providers and program leads. They shared that they've experienced consistency in staff despite turnover elsewhere. There is a strong sense of community ownership and mutual support among providers, which leads to informal but effective coordination among local service agencies.

Faith-based and school-led partnerships: Faith-based organizations and churches are consistently active in filling resource gaps, including food, hygiene supplies, and emergency motel placements. School districts are actively engaged and often serve as the first to identify unhoused students and families.

Local champions and political buy-in: Local champions are willing and able advocates for specific populations (e.g., reentry, youth, domestic violence survivors). The region is developing relationships with elected officials, which were cited as a strength by some.

Unique land opportunities: The nature of land in the Mountain Region means that there is a strong potential for collaboration with public land agencies (National Forest, State Parks) to support outreach and PITC visibility. In addition, some private landowners may be open to partnerships around tiny homes, safe parking, or service hubs if liability and code issues are addressed.

Mountain Resource Guide: The Mountain Region maintains a local resource guide to shelter, housing and supportive services in the region, which is available in a printed version for anyone who needs it.

Gaps

Lack of resources based specifically in the Mountain Region: There are few dedicated outreach or shelter resources physically based in the Mountain region and no Mountain-specific housing resources or prioritized placements. The lack of resources means that there are few system-wide safety nets; if a local staff person leaves or a small agency closes, entire parts of the community lose access. The lack of consistent outreach leads to missed opportunities to engage clients before crises occur. Multiple

participants emphasized the need for a locally based peer navigator or outreach worker, potentially hired from within the Mountain community. Another particular concern for participants is the lack of warming/cooling centers or year-round facilities that respond to weather-related needs.

Climate and transportation barriers: Transportation barriers in the region were described as profound, with virtually no options for people without cars. Fire, snow, and weather events pose immediate risks to unsheltered people, with little infrastructure to respond quickly, and emergency response systems do not always include plans for people without housing.

Limited CES integration: Providers described a regional lack of confidence that referrals to CES translated to good housing outcomes for people experiencing homelessness in the Mountain Region. Clients may also experience high levels of fear or mistrust of government systems, particularly if past attempts to get help have failed. As a result, CES use is not uniform and resource access is often dependent on individual relationships, which makes continuity difficult when staff turnover.

Limited countywide planning representation: Mountain Region participants described a lack of representation at many countywide planning tables and a fear that Mountain voices often are overlooked. Additionally, many people experiencing homelessness in the Mountains are not visible in data defined by urban homelessness. People in the Mountain Region are more likely to be camping in forests, living in cars, or couch surfing, experiences that are not accurately reflected in PITC or other measures of homelessness. The differences and the geographic isolation of the region means that residents and public officials outside the Mountains may not understand or prioritize local needs.

Lack of coordinated messaging: Information is inconsistently available, and knowledge of local resources varies among frontline providers. Participants expressed interest in community education to reduce stigma and help housed neighbors better understand what homelessness looks like in their area.

West Valley Region

The West Valley includes some of the most suburban and economically developed parts of the county, including cities like Ontario, Rancho Cucamonga, and Upland. It benefits from its proximity to Los Angeles with access to skilled workforce, a diversified economy, and has a strong logistics, retail, and manufacturing presence. The area has seen rapid growth in recent years, which has brought infrastructure and housing development challenges, along with increasing diversity and the need for more diverse and culturally competent providers.

Strengths

Deep collaboration and partnership: West Valley providers praised the "collaboration of community-based organizations (CBOs), health care partners, and government partners." Participants highlighted a strong spirit of cross-agency problem solving, with a shared belief that "everyone is here for the good of the clients." Relationships across systems were described as a real asset — partners reported being able to "connect with each other quickly to solve problems," even when systems themselves are still evolving. Stakeholders noted that this kind of person-to-person coordination remains one of the region's greatest strengths.

City engagement: Over the last five years, every city in the region has stepped up to support homelessness efforts, though levels of participation still vary. Stakeholders acknowledged growing momentum behind city involvement, with some jurisdictions taking on more planning, funding, and leadership roles. However, engagement is often driven by individual local "champions" — and participants stressed the importance of building structures that can help sustain engagement over time.

Strong County support: The County Office of Homeless Services (OHS) was recognized for playing a central role in training and coordination, especially important given the high rate of staff turnover across

the region. Providers expressed appreciation for the system-level guidance and troubleshooting support OHS offers, particularly in the context of HMIS and Coordinated Entry improvements.

Innovative service models: Stakeholders repeatedly described West Valley service providers as resilient and innovative. Even in the face of limited housing resources, teams continue to “make it work” — finding creative ways to connect people to services and troubleshoot complex cases. Flexibility and responsiveness were called out as defining features of the local system.

Health-housing coordination: The region was recognized for effective partnerships between housing and health care, particularly through the Ryan White and HOPWA programs. Participants pointed to these examples as proof that cross-sector integration is both possible and powerful. Stakeholders also voiced interest in expanding these models under initiatives like CalAIM.

Opportunities

People in need of sobering centers or residential treatment: Limited non-housing options mean that homelessness is sometimes criminalized instead of addressed. Participants flagged the absence of residential programs that allow parents and children to remain housed together during treatment, as well as a general lack of access to detox services — especially in the West Valley. Stakeholders expressed interest in adapting models from other counties or states to fill this gap.

Affordable housing shortages: Despite investments, “lots of new units are going up, but who can afford them?” Rents continue to outpace local incomes — particularly for single mothers and extremely low-income families — making even subsidized housing out of reach. Stakeholders agreed that “having funding doesn’t matter if there are no units.” Long waitlists and limited move-in options were flagged as chronic system barriers. Buy-in from private landlords remains inconsistent. While some cities have piloted landlord fairs or incentive programs, uptake has been low, and many property owners are hesitant to rent to people exiting homelessness. Stakeholders noted that strong local leadership makes a difference — but that these partnerships are fragile without long-term engagement strategies. Nimbyism and community resistance continues to block projects, particularly in suburban neighborhoods.

Uneven HMIS and CES participation: Not all providers use centralized tools, resulting in major coordination and data gaps. Stakeholders noted that without complete system engagement, the region lacks full visibility into need, service utilization, and housing matches. Uploading and tracking documentation in HMIS continues to be a challenge, especially for smaller agencies. Participants expressed strong frustration with the “wild amount of paperwork” required for housing placements, especially when coordinating across systems or onboarding new agencies into HMIS. Excessive documentation slows down the process and contributes to missed opportunities to connect people to housing.

City representation gaps: Not all jurisdictions consistently participate in the West Valley RSC, with at least one City reportedly never sending a representative. This limits cross-jurisdictional planning and makes it difficult to ensure equitable access to funding and program improvements across the area.

Under-utilization of trusted messengers: Participants noted that cities and nonprofit partners already embedded in local communities are under-leveraged in outreach, public education, and narrative work. In moments of pushback or confusion — especially during housing development — these actors could play a key role in shifting public understanding, if resourced and included.

CoC and Systemwide Findings

The five RSCs are part of a regionwide CoC. While each RSC has its own unique strengths and gaps, there are consistent challenges systemwide that impact all areas of the county.

1. Addressing geographic inequities and strengthening system coordination would improve access across the County.

Access to homelessness services across the county is highly inconsistent, with rural and remote areas like the East Desert and parts of the High Desert and Mountain regions reporting significant service gaps and lack of visibility in County planning. Stakeholders described a system that is difficult to navigate, slow to respond, and too reliant on centralized, brick-and-mortar access points. CES participation is perceived as unresponsive, with many clients never receiving follow-up after initial contact. Long 2-1-1 call times, insufficient satellite sites, and the absence of regionally embedded staff further compounds these challenges.

To address the gaps, participants recommended low-cost, high-impact strategies to bring access points to the people who need them via ideas like rotating CES access points at libraries, schools, or nonprofit buildings, mobile outreach and assessment teams equipped with real-time HMIS tools, and expanded use of QR codes and digital directories like Connect IE. Community colleges, churches, and public spaces could serve as localized hubs, supported by onboarding toolkits for new providers and regionally based coordinators. A stronger digital infrastructure paired with printable, multilingual, and tech-free options is also critical for reaching under-connected communities. Stakeholders also called for better mapping of service gaps and public dashboards to guide policy and siting decisions.

2. There is an urgent and growing opportunity to expand the stock of deeply affordable housing and PSH units throughout the CoC.

The region faces a critical shortage of deeply affordable housing and PSH, driven by rising housing costs, gentrification, and displacement. In the Mountain and East Desert Regions, tourism-fueled short-term rentals are pushing out low-income residents, including essential workers. Widespread landlord-driven evictions and unit renovations are reducing the stock of accessible rentals, with few alternatives for displaced tenants. These trends have created bottlenecks in the homelessness response system, particularly for high-barrier populations.

To address housing access challenges, stakeholders emphasized the need for deeper engagement with landlords through stabilization funding, partnerships, and regional landlord outreach efforts, especially targeting reentry and youth populations. They also recommended alternative housing models such as shared housing, modular construction, and limited-profit developments to quickly expand housing supply. Public education campaigns to counter stigma and NIMBYism were seen as key to building local support. Finally, stakeholders highlighted improving service connections — such as providing transportation from detention centers to navigation hubs — as an opportunity to better link vulnerable individuals to housing at critical transition points.

3. Expanding accessible, low-barrier shelter options will strengthen and complete the CoC's crisis response.

Across the region, there are not enough low-barrier, housing-focused shelters that individuals and families can access without preconditions such as sobriety or service participation. NIMBY-driven opposition continues to stall or prevent the siting of shelters and supportive housing throughout the county. The resistance reinforces access gaps for people in urgent need, leaving entire geographic areas underserved.

Stakeholders suggested expanding shelter options through creative models like barracks conversions, tiny home villages, safe parking programs with mobile behavioral health services, and partnerships to repurpose vacant motels, churches, or homes. Specific regional strategies, such as a winterization and emergency shelter plan for the Mountain communities and dedicated shelter pathways with transportation support, were proposed to meet seasonal and geographic needs. Public education

campaigns to combat myths and community resistance remain essential to advancing shelter access across the county.

4. Enhancing HMIS and Coordinated Entry consistency and participation will improve systemwide data.

Limited and uneven participation in the Homeless Management Information System (HMIS) and CES leads to inaccurate data and restricted access to housing resources. Many smaller or faith-based providers, especially in the Mountain and Desert regions, are not connected to the formal homelessness response system, leaving significant gaps in data and service coordination. As a result, PITC underrepresent the true scale of homelessness in these regions, particularly where people live in RVs, overcrowded homes, or other hidden situations.

Participants stressed the need for expanding HMIS access, improving training and technical support, and engaging informal service providers with light-touch approaches. County-led efforts to broaden license distribution are promising, but inconsistent application of CES policies remains a barrier, especially where access to permanent housing is limited to those navigating through emergency shelters. A more inclusive, flexible, and well-supported system is needed to improve data quality and ensure equitable housing access across the region.

5. There is significant potential to grow and better utilize prevention and diversion efforts, offering upstream solutions that could reduce inflow into the homeless response system and supporting long-term stability.

The CoC lacks a strong infrastructure for homelessness prevention and diversion, important elements needed to reduce inflow into the homelessness response system. Stakeholders highlighted the need for upstream strategies to keep individuals housed before they reach a crisis point, like flexible financial assistance, housing stabilization resources, and community-based support. Upstream strategy tools are especially critical in high-cost areas like the Central and West Valley Regions where even minor financial shocks can lead to homelessness.

Participants also emphasized the importance of workforce development as a prevention strategy, particularly for youth and vulnerable adults. Investments in job training, youth employment programs, direct cash transfers, and wraparound supports could offer sustainable pathways out of poverty and housing instability. Overall, there was broad agreement that prevention and diversion are underutilized components of the current system and must be scaled up to reduce long-term system pressure and improve outcomes.

6. By enhancing services for special populations, the CoC could help ensure that all individuals receive appropriate and equitable support.

The needs of certain key populations are especially unmet due to limited outreach capacity, lack of tailored programs, and systemic barriers. Participants in focus groups identified gaps in service particularly for youth, veterans, families, LGBTQ+ individuals, and undocumented residents. Current outreach strategies are often too generalized to engage people with diverse lived experiences, especially unsheltered individuals and youth. Participants called for youth-centered engagement through platforms like TikTok and Discord, and school-adjacent, zero-barrier drop-in centers offering basic resources like food, Wi-Fi, and support services.

Participants also discussed a chilling effect on honest conversations about equity in the past few months. Organizations reported fear of funding loss if they are vocal about serving Black, Latino, LGBTQ+, or undocumented populations, which stifles innovation and transparency in addressing need. This hampers the CoC's ability to strategically address inequities, of which there are many documented.

For example, Black/African American residents are 3.9 times more likely to experience homelessness in San Bernardino County than the general population, which is a core system challenge that shows up in inflow, service access, and housing placement.

7. Increasing funding transparency and simplifying processes to obtain funding would ensure that all providers, including smaller and less-resourced organizations, an effectively leverage all available funding resources.

Stakeholders across the county described barriers to accessing and navigating homelessness funding, especially for smaller and rural organizations. Many grants prioritize direct services while excluding vital investments in staffing, infrastructure, or capacity-building, which leaves newer providers without the tools to grow sustainably. Additionally, complex contract language, rigid timelines, burdensome indemnification clauses, and limited transparency in County RFPs disproportionately exclude those organizations best positioned to serve under-resourced areas. Additionally, there is a sense that population-based allocations fail to account for per-capita need, while philanthropic investment remains virtually absent in many parts of the region.

Participants called for major reforms to make funding more equitable and effective. Recommendations included creating flexible prevention funds with streamlined disbursement, offering small capacity-building grants paired with technical assistance, and building a County-managed rural infrastructure support pool to share grant writing, compliance, and administrative resources. Strengthening partnerships with City governments and leveraging opportunities like CalAIM and Homekey were also seen as essential. Finally, stakeholders emphasized the need for more accessible, plain-language RFPs, transparent timelines, and deeper collaboration with Medi-Cal managed care plans to better align housing and health systems for high-needs clients.

8. Supportive services should be expanded and better coordinated to more fully meet community needs.

Throughout the county, stakeholders highlighted the lack of access to critical supportive services that enable housing stability, including workforce development, transportation, and behavioral health services. Participants highlighted the need for more intentional coordination between housing and employment systems, without which individuals exiting homelessness struggle to access or sustain jobs that could support long-term stability. In more remote and isolated regions, transportation emerged as a major barrier to access for shelter, services, and employment.

Participants advocated for creative solutions to transportation issues such as mileage reimbursement, peer driver programs, or shuttle partnerships. They also discussed expanding supportive service access through trusted community institutions like libraries, schools, and community colleges; locations that could host navigation kiosks or serve as drop-in sites for assessments and referrals, helping bridge the service gap without requiring costly new infrastructure.

9. Strengthening system-wide coordination between the RSCs, CoC and County presents a key opportunity to enhance coordination, improve access, and build overall capacity.

Collaboration across the CoC, County departments, and City governments can be fragmented and uneven, especially across different funding streams, program models, and geographic areas. Stakeholders described a need for intentional coordination efforts, especially in Cities with minimal engagement or trust in the current system. Proposals included piloting embedded liaison roles to bridge City–County silos, offering regular CES and HMIS training to all RSCs, and expanding rural outreach to build awareness and reduce stigma about services.

Capacity challenges further weaken collaboration. Workforce shortages, burnout, and limited onboarding structures leave many providers overstretched, with some programs run by volunteers or a single staff member juggling multiple roles. Stakeholders recommended creating system-wide training and support systems including a "First 90 Days" onboarding kit for new grantees and staff, increasing visibility of tools like 2-1-1, and offering small, targeted capacity-building grants paired with technical assistance. Improved systemwide education, support, and communication, especially in rural areas, are essential to strengthening CoC-wide alignment and ensuring more consistent service delivery across the region.

10. There is a valuable opportunity for the CoC to more fully center the expertise and leadership of people with lived experience to enrich decision-making and system effectiveness.

Stakeholders emphasized the importance of authentically integrating people with lived experience (PWLE) into all aspects of the homelessness response system. There are no designated seats for people with lived experience on the various RSCs, the regional decision-making bodies for the CoC, or the CoC itself. Participants commented on the lack of persons with lived experience at the RSC strategic planning focus groups and asked for greater transparency of the process for people currently experiencing homelessness. Further, while the County's efforts to hire youth with lived experience were widely praised, participants highlighted the need for mentorship, training, and patience to ensure success.

To move beyond tokenism, stakeholders urged the inclusion of PWLE in all decision-making spaces and urged the development of structured, paid roles for PWLE in outreach, planning, and program design. Youth with lived experience should be hired to co-lead peer engagement efforts. There was also a strong interest in creating advisory positions, leadership pipelines, and outreach stipends that recognize PWLE expertise and ensure their ongoing influence over system policies and practices.

11. Engaging cross-sector partners more deeply will help break down silos, enhance information sharing, and increase the overall impact of services.

The homelessness response system is missing key opportunities to partner more effectively with schools, faith-based organizations, health systems, and workforce providers to streamline services for their shared clients. Stronger collaboration with school districts and integration of McKinney-Vento training into school and City outreach could expand early intervention and stability for students. Community colleges could also serve as valuable partners for both service navigation and building the frontline workforce through housing-focused certification programs.

Faith-based groups were identified as ideal partners for expanding "Yes In God's Backyard" (YIGBY) housing and safe parking initiatives, using existing land and community trust. Additionally, cross-sector alignment with Medi-Cal managed care plans, tribal service providers, reentry systems, and behavioral health networks was seen as crucial, especially given the lack of detox, trauma care, and LPS-certified hospitals in rural areas. Trusted messengers like school staff, domestic violence advocates, and church volunteers could also play a stronger role in connecting people to CES. Formalizing these partnerships, launching workforce pipelines, and integrating housing supports into education, reentry, and public health programs would significantly expand system capacity and reach.

Next Steps

Homebase will work with the individual RSCs, and the CoC as a whole to establish a common set of goals, objectives, performance metrics, and outcome measures in line with the findings in this analysis. Together they will decide on a group of shared goals and strategies for the plan, and work to develop

San Bernardino County CoC: Gaps and Needs Analysis (June 2025)

and prioritize recommendations and strategies for each region and the County based on their unique needs, trends and resources. Homebase will continue to gather and analyze qualitative data via surveys and lived experience focus groups to help refine their recommendations.

San Bernardino Continuum of Care (CoC) Inclusion Advisory Committee

The San Bernardino-Continuum of Care (CoC) is working with Homebase to form an Inclusion Advisory Committee (IAC). The IAC will be a group of committed residents, providers, advocates, and partners working to shape a more just and effective response to homelessness in San Bernardino County. The IAC will play a vital role in ensuring that equity—across race, age, gender, disability, and lived experience—is at the center of how we design, fund, and deliver housing and homeless services in San Bernardino County.

We are looking for:

People with lived experience of homelessness (including young adults, families, and adults). Individuals with lived experience of homelessness will be compensated for their time.

Community advocates and leaders with a passion for equity and housing justice
Service providers, system leaders, and cross-sector partners; and

Anyone with a deep commitment to making systems more inclusive, responsive, and effective

What Will the Committee Do?

The IAC will review data trends, questions, and concerns highlighted through Homebase's ongoing data analysis. Homebase and the IAC will work together to draft recommendations in a final report to the CoC.

If you've never reviewed data or helped come up with recommendations, that is OKAY! This process is designed to be inclusive and supportive for all involved.

How Will the Committee Meet:

Monthly Virtual (join by phone or web-based video) Meetings

Please register to attend meetings individually.

- August 26, 2025, 10am – 11am PT, [Register Here](#)
- September 16, 2025, 10am – 11am PT, [Register Here](#)
- October 21, 2025, 10am – 11am PT, [Register Here](#)
- November 18, 2025, 10am – 11am PT, [Register Here](#)

If you have any questions, please email: SBequity@homebaseccc.org.

San Bernardino City and County

Continuum of Care

CA 609

Governance Charter

Adopted July 24, 2024

CHARTER REVISION TRACKING PAGE

Version	Date	Sections Edited	Level of Change
7.2024	7.17.2024	Chap. 2,3, 8	Substantive updates to Brown Act compliance.
7.2024.1	7.24.2024	Chap. 3, pg.4	Number of Service Provider Seats 5 or 6.
7.2024.1	7.24.2024	CoC Charter	Adopted, as follows.

Note: Chapters are designed to address each area, and are paginated separately.

Chapter 1

Introduction & Purpose

Contents

Introduction	2
References	2
Overview	2
Structural Components	3
Graphic Depiction of CoC Required Components	4
Levels of Responsibility	4
Identification and Profile of the CoC	5

Introduction

This chapter provides an introduction to and a general overview of the Continuum of Care (CoC).

References

The following references are applicable to the information in this chapter:

- 24 CFR 578.7(a)(3)
- McKinney-Vento Homeless Assistance Act, Title IV, part C. (42 USC 11381-11389)
- Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act): Continuum of Care Program, 77 Fed. Reg. 45422, July 31, 2012 (24 CFR §578) (referred to as the CoC Program Interim Rule).

Overview

Annually, the U.S. Department of Housing & Urban Development (HUD) awards federal homeless assistance grants through a competition among organizations that participate in local homeless assistance program planning networks. These networks, referred to as Continuums of Care (CoCs), work to address homelessness by identifying community-specific needs and responding with a coordinated system of housing and services. The approach is predicated on the understanding that homelessness is not caused merely by a lack of shelter, but involves a variety of underlying, unmet needs and conditions – physical, economic, and social.

The CoC program is authorized by the McKinney-Vento Homeless Assistance Act and implemented through HUD. Communities that receive funds under the HEARTH Act have specific responsibilities which are described in Interim Rule¹.

At the federal level, the CoC program is intended to:

- Promote a communitywide commitment to the goal of ending homelessness.
- Provide funding for efforts by nonprofit providers and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness.
- Promote access to and effective utilization of mainstream programs by homeless individuals and families.
- Optimize self-sufficiency among individuals and families experiencing homelessness.

To these ends, HUD requires communities to establish, organize, and operate a system of care to carry out the responsibilities described in the Interim Rule. At the local level, the CoC is group composed of representatives from relevant organizations to the extent these groups are present in the geographic boundaries of the CoC:

- Advocates
- Affordable housing developers
- Businesses
- Mental health agencies
- Nonprofit homeless service providers

¹ All statutory references are to 24 CFR Part 578 [HEARTH Interim Rule (July 2012)] and subsequent updates unless

otherwise stated.

- Faith-based organizations
- Governments
- Homeless and formerly homeless persons
- Hospitals
- Law enforcement
- Organizations that serve homeless and formerly homeless veterans
- Public housing agencies
- School districts
- Social service providers
- Universities
- Victim service providers

Regulations charge the CoC with specific actions and responsibilities. These include the development, following and annual update of a:

- Governance Charter, including all policies and procedures needed to comply with the Interim Rule.
- Data system, referred to as the Homeless Management of Information System (HMIS), as prescribed by HUD.
- Code of conduct and recusal process.

Structural Components

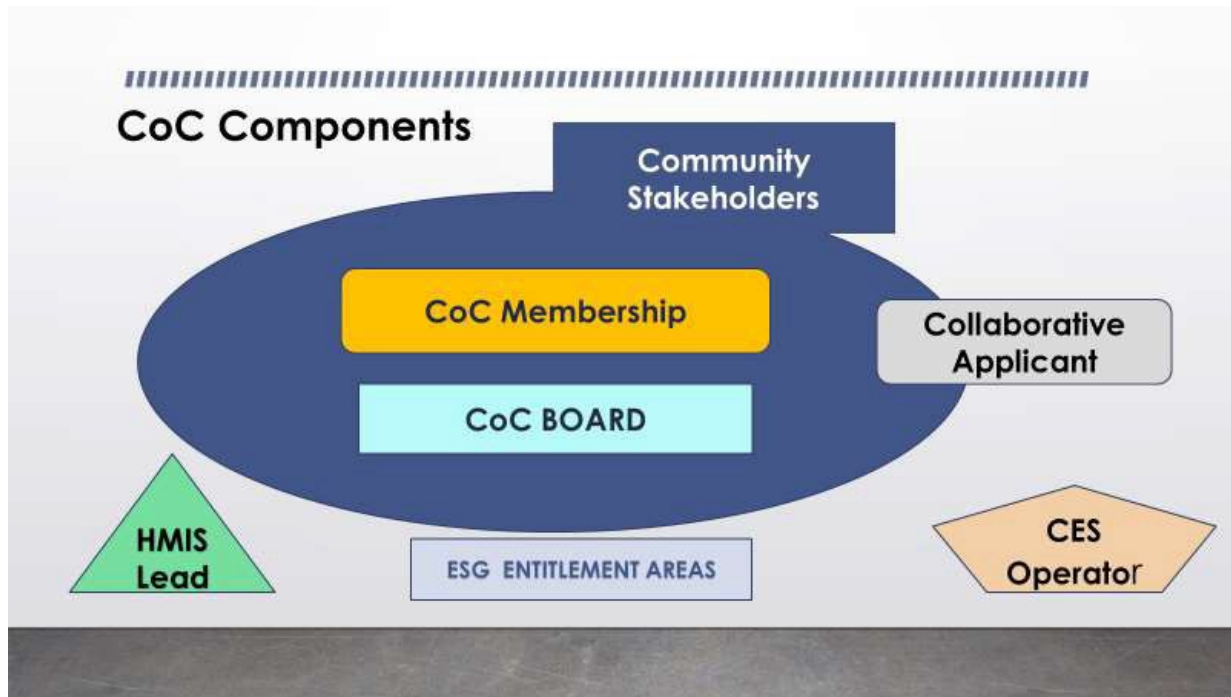
The structural components of the CoC include the following:

- Community Stakeholders – Individuals and organizations throughout the community who are interested in the issues of homelessness within the CoC area.
- General Membership – Representatives from the relevant community stakeholders who are registered members of the CoC. In addition to the relevant organizations named in the Interim Rule, the General Membership includes community stakeholders who are invested in ending homelessness in the region. Examples include (but are not limited to) private foundations, philanthropists, labor and employment organizations, and fraternal organizations.
- Board – Persons selected via the authorized process to represent the CoC stakeholders and participate as required by the Interim Rule.
- Collaborative Applicant – The legal entity and eligible applicant selected to apply for HUD federal funding on behalf of the CoC (the Membership is not a legal entity and therefore not eligible to apply for funding). The Collaborative Applicant holds responsibilities associated with the CoC Application and reporting processes.
- Homeless Management of Information System (HMIS) Lead Agency – An eligible applicant selected as the responsible entity for:
 - The compliance, management, and operations of the HMIS, CoC data systems, and a comparable data base for victim service providers, as described in HUD regulations; and
 - Satisfying all HUD Data Exchange (HDX) reporting requirements.
- Coordinated Entry System (CES) Lead Agency – The entity responsible for the compliance, management, and operations of the CoC-approved Coordinated Entry System.
- Emergency Solutions Grant (ESG) Jurisdictional Recipients – Jurisdictions identified by HUD as eligible direct recipients of ESG funds.
- Committees – Includes Standing Committees, Sub-Committees, Ad Hoc Committees or Task Groups formed by the CoC, the Board, Collaborative Applicant, HMIS Lead

Agency, or CES Lead Agency in accordance with the Governance Policies for establishing such subgroups².

- State Administrative Entity – A legal entity meeting the State of California criteria for applying for and managing funds designated to the CoC from various state homeless programs.
- Administrative Agent - Title used for the legal entity selected to perform the functions of both the CoC Collaborative Applicant and the State Administrative Entity.

Graphic Depiction of CoC Required Components



The required components of the CoC system are depicted in the graphic above. The Administrative Agency carries the roles and responsibilities of both the CoC Collaborative Applicant and the State Administrative Entity.

Levels of Responsibility

Roles and responsibilities for the CoC structural components are organized by component and the requirements of the Interim Rule. A chart summarizing the roles and responsibilities for all structural components is found in the Appendices.

A list of Terms and Acronyms associated with the CoC is also found in the Appendices.

² Descriptions for subgroups are found in Chapter 8: Committees

Identification and Profile of the CoC

CoC Name

The CoC of the City and County of San Bernardino, CA, which is identified by HUD as “CA-609”.

CoC Board Name

SB CoC Board - Currently the Interagency Council on Homelessness (ICH).

Geographic Boundaries

The incorporated and unincorporated areas and territories within the geographic boundary of San Bernardino County.

Composition/Structure

Includes the following:

- General Membership
- CoC Board
- Collaborative Applicant
- Coordinated Entry System (CES) Lead Entity
- Homeless Management Information System (HMIS) Lead Agency
- Associated Standing and Ad Hoc Committees and Workgroups

Collaborative Applicant & HMIS Lead Agency

San Bernardino County Office of Homeless Services (OHS)

Coordinated Entry System (CES) Lead Entity

Inland SoCal United Way 211+

Point of Contact

The CoC Board Secretary is the initial point of contact for the CoC.

Collaboration with Other Bodies Addressing Homelessness

The SB CoC collaborates with a number of other bodies dedicated to addressing homelessness. Given the vast geography of San Bernardino County, these bodies play an important role in informing the actions of the CoC and communicating the needs of persons in various communities who are or at risk of becoming homeless. Collaboration with Emergency Solutions Grant (ESG) recipients, persons with lived experience in homelessness, and state and local entities is critical in planning, resource allocation, goal setting and evaluation.

Chapter 2 Membership

Contents

Introduction	2
References	2
Purpose.....	2
Composition.....	2
Expectations of Members of CoC Member Representatives	3
Eligibility and Types of Membership	4
Becoming a CoC Member	4
Becoming a Voting CoC Member.....	4
Voting Privileges and Limitations	5
Term, Attendance and Voting Privileges	5
Meeting Procedures and Decision Making	6
Quorum	6
Full Membership and Annual Meetings	6
Roles and Responsibilities	7
Roles and Responsibilities of the CoC Membership	7
Locally Defined Roles and Responsibilities	8

Introduction

This chapter addresses the roles, responsibilities, protocols, and practices related to the Continuum of Care (CoC) General Membership body (Membership).

References

The following references are applicable to the information in this chapter:

- 24 CFR 578.7(a)(3)
- Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act): Continuum of Care Program, 77 Fed. Reg. 45422, July 31, 2012 (24 CFR §578) (referred to as the CoC Program Interim Rule).
- Ralph M. Brown Act: California Government Code § 54950, 1953.

Purpose

The Continuum of Care (commonly referred to as “CoC” or “Continuum”) oversees a community's plan to organize and deliver supportive social services, including housing options, which meet the specific needs of homeless individuals and families. Ultimately, the goal of the CoC is to move homeless people toward stable housing and maximum self-sufficiency. The U.S. Department of Housing and Urban Development (HUD) requires the establishment of a CoC in order to receive federal CoC Program funding.

Composition

The San Bernardino City and County Continuum of Care (SB CoC) Membership consists of stakeholders who represent local organizations and projects serving homeless subpopulations within the geographic boundaries of San Bernardino County. This includes the following:

- | | | |
|----------------------------------------------|-------------------------------------------|---------------------------------|
| • Advocates | • Hospitals | • Social service providers |
| • Affordable housing developers | • Law enforcement | • Universities |
| • Businesses | • Mental health agencies | • Veteran service organizations |
| • Faith-based organizations | • Nonprofit homeless assistance providers | • Victim service providers |
| • Governments | • Public housing agencies | |
| • Homeless and formerly homeless individuals | • School districts | |

Membership is extended to additional stakeholders to the extent that they are invested in resolving homelessness in San Bernardino County. This includes, but is not limited to, the following:

- | | | |
|---------------------------|-----------------------|----------------------------------------|
| • Employment development | • Organized labor | • Philanthropists |
| • Fraternal organizations | • Private foundations | • Private health service organizations |

The CoC community includes, but is not limited to, the following people who are homeless or at risk of homelessness:

- Black, Indigenous, and Persons of Color (BIPOC)
- Chronically homeless
- Families with children
- Homeless youth
- Members of the LGBTQ+ community
- Persons who are seriously mentally ill
- Persons with:
 - HIV/AIDS
 - Substance use disorders
- Unaccompanied women
- Veterans
- Victims of domestic violence, dating violence, sexual assault, and stalking

The SB CoC seeks to ensure the participation of diverse stakeholders in community dialogues related to homelessness. As such, all stakeholders are encouraged to attend meetings, participate in discussions, and serve on workgroups and committees as appropriate.

A public invitation within the Geographic Areas of the SB CoC will be extended at least annually for new members to join in accordance with regulation.

Expectations of Members of CoC Member Representatives

Each CoC Member is expected to:

- Demonstrate a professional interest in or personal commitment to addressing and alleviating the impacts on individuals experiencing homelessness, and on the community at large.
- Commit to making informed and independent voting decisions.
- Participate in the SB CoC's Homeless Management Information System (HMIS), if the Member provides direct services (except for victim service providers who are barred by law from participating in the central HMIS but must participate in a comparable data base).
- Take part in CoC activities through participation in CoC committees and advisory work groups.
- Participate in the Coordinated Entry System (CES) and follow CES policies.

Each CoC Member is encouraged to:

- Offer their expertise to help ensure the success of the CoC.
- Identify, support, and advocate for program and systemic changes to improve services and outcomes for homeless and at-risk populations.
- Identify and communicate current and emerging needs and funding opportunities related to affordable housing and homelessness.
- Serve as a liaison between the CoC and the member's constituencies.
- Help to engage, inform, and educate the broader community about effective solutions for ending and preventing homelessness.
- Be an active participant in CoC meetings, workgroups, and committee.
- Contribute in efforts to conduct the annual homeless Point-In-Time Count, the count of sheltered and unsheltered people experiencing homelessness required by HUD.

Eligibility and Types of Membership

Membership in the SB CoC is open to all stakeholders concerned with and/or providing services to the various homeless subpopulations, and who are interested in collaborative, solution-oriented planning to address homelessness in the region. Membership shall be composed of two types:

- **Organizational Member** – Any public, private, non-profit, or for-profit organization, corporation, agency, group, or association interested in supporting the CoC's commitment to ending homelessness.
- **Individual Member** – An individual stakeholder, such as a consumer, advocate, volunteer, or resident interested in supporting the CoC's commitment to ending homelessness. Any individual who is not directly affiliated with an organizational member may become an Individual Member. For the purpose of determining eligibility, direct affiliation is defined as employees, directors, active or long-term consultants, and high-level volunteers. An individual identified as the delegate for an organization cannot hold a dual membership as an Individual Member. If an individual representative from an organization member leaves that organization, they may apply for an Individual membership.

There are no dues or fees required for membership.

Becoming a CoC Member

Stakeholders become CoC members by:

- Completing an application packet consisting of the following:
 - SB CoC Membership Application,
 - Acknowledgment the CoC's Guiding Principles, Code of Conduct and Conflict of Interest,
- Submitting the completed application packet to the Collaborative Applicant (accepted year-round), and
- Registering to the CoC's Membership Distribution List.

Membership is established after the stakeholder's completed application packet submission to the Collaborative Applicant and subsequent receipt of acknowledgement. The Collaborative Applicant, upon receipt of the completed application packet, will add the requestor to the membership roll (after confirming there is no duplication) and provide an acknowledgment of membership.

Members are designated as **non-voting members** until they satisfy the requirements to become a voting member of the CoC.

Becoming a Voting CoC Member

To become a **voting member** of the SB CoC, the following is required of an Individual Member or the primary delegate of the Organizational Member:

- Submission of a completed application packet (if not completed and submitted previously).
- Completion of the New Voting Member Orientation.

- Submission of Certification of Completion of the New Voting Member Orientation to the Collaborative Applicant/Secretary.
- Attendance at three CoC meetings in the prior 12 months. This can be a combination of the CoC General Membership or subregional meetings but must include at least one CoC General Membership meeting.

Voting Privileges and Limitations

An **Organizational Member** is entitled to possess and exercise a maximum of one (1) vote on matters concerning the ongoing business of the CoC. Each organization must select a/an:

- Primary delegate who will vote for the organization.
- An alternate delegate who would be present to cast the member's vote in the absence of the primary voting delegate. The designation of the alternate for an organization should be submitted in writing to the CoC Chair on the organization's letterhead prior to a meeting in which the alternate is authorized to vote.

Paid employees/consultants/volunteers of a voting organization, who are the designated representatives for that organization, are not allowed to also join the CoC as an Individual Member.

An **Individual Member** shall possess and exercise a maximum of one (1) vote on matters concerning the ongoing business of the SB CoC. Each Individual Member

- Is deemed the primary voting delegate.
- *May* select an alternate delegate who would be present to cast the member's vote in their absence. The designation of the alternate delegate should be signed and submitted in writing to the CoC Chair prior to a meeting in which the alternate is authorized to vote.

When a voting member is unable to attend a meeting where a vote will take place, the voting member's predesignated alternate delegate is authorized to vote on the member's behalf. The member's alternate delegate must sign into the meeting.

Term, Attendance and Voting Privileges

There is no membership term limit. Members of the CoC who have achieved voting status will retain such status as long as they remain in good standing. To remain in good standing, voting members are required to:

- Attend not less than three (3) CoC General Membership or regional meetings in a calendar year (at least one of the meetings attended must be a CoC General Membership meeting);
- Annually sign the Code of Conduct and Conflict of Interest acknowledgement forms; and
- Participate in mandatory trainings as announced by the CoC.

Regularly scheduled meetings include those that are on the annual meeting schedule and publicly announced by the CoC or regional meeting leadership. A website calendar identifies monthly subregional meetings on specific weeks and days of the month. Attendance at meetings is tracked by member sign-in or through virtual platform

attendance lists. However, it is the responsibility of the attendee to ensure they sign in to each meeting.

Each eligible voting member of the CoC can vote on any actionable item that is presented to the CoC membership for a vote.

If a member fails to attain the above minimal requirements, they rescind their voting privileges. Voting privileges can be re-established by meeting the requirements above.

The Collaborative Applicant will maintain a list of members gaining voting privileges, at risk of losing voting privileges, and having lost voting privileges within 30 days following each general membership meeting. This list will be available to members upon request.

Meeting Procedures and Decision Making

Meetings of the full membership will be held at least three times each year, including an Annual Membership Meeting in which elections will be held. The CoC will designate the Facilitators who will lead the meetings. An agenda of the meeting will be published at least 72 hours prior to the meeting through the Membership Distribution List maintained by the Collaborative Applicant, and through email distribution lists. All meetings are open to the public. Meetings will follow the published agenda and be conducted under the approved Rules of Decorum, founded on Robert's Rules of Order. The recording of minutes will occur and be the responsibility of the Board Secretary.

At all meetings, voting members should strive to decide on action items by arriving at a consensus. If a vote is necessary, all votes will be by voice or ballot at the will of the majority in attendance. The exception to this rule is a vote to elect CoC Board members, in which a vote will be held by written ballot.

Quorum

The number equal to a majority of those with voting member status at the time of the meeting will constitute a quorum for the purpose of voting at any general membership meeting. Protocols for situations where there is a lack of a quorum are located in Chapter 10 – Code of Conduct.

Full Membership and Annual Meetings

The SB CoC will hold full membership meetings three times a year, typically in March, July, and November. One of these meetings will be designated as the annual meeting.

Election of the CoC Board of Directors will take place at the designated annual meeting, or another date as publicly announced in advance. Other business may include approval of changes to the Governance Charter, adoption of the written process for Board Member selection, and any other action delegated to the CoC membership for decision making.

Roles and Responsibilities

Roles and responsibilities of the CoC Membership include the following:

- **Regulatory Roles and Responsibilities:** Identified through federal and state regulation.
- **Locally Defined Roles and Responsibilities:** Delegated by the Membership.

There are three basic levels of responsibility:

- **Authority/Oversight:** Provides authority or oversight of a specific activity. Authority indicates the group with a formal vote as the responsible/approving body. Oversight indicates that reports and information will be provided to this body by another component.
- **Lead:** Charged with leading the action to implement the responsibility in accordance with the HUD regulations, CoC policies, and procedures. The Lead works closely with the CoC Board and the support structures to realize the vision for CoC system of care. The Lead works collaboratively within the structure to coordinate and operationalize the area of responsibility.
- **Support:** Is consulted and/or an active participant in carrying out a HUD regulation in collaboration with other structures and systems. These entities join the Lead in taking the action by providing expertise, information, and/or commitment to implementation.

Roles and Responsibilities of the CoC Membership

The following table identifies **Regulatory Roles and Responsibilities** of the CoC Membership as per Title 24 of the Code of Federal Regulations (CFR), and is organized by Level of Responsibility:

Level of Responsibility	Activity	Implementation/Operation
Authority	Establish the Continuum of Care §578.5(a)	<ul style="list-style-type: none">● Implements via a vote of stakeholders.● Registers official members.
	<ul style="list-style-type: none">● Adopt and follow a written process for Board Member selection● Review, update as necessary, and approve the process at least once every five (5) years §578.7(a)(3)	Implements via a vote of the official membership.
Authority/ Oversight	Establish a Board that: <ul style="list-style-type: none">● Is representative of the relevant organizations and of projects serving homeless subpopulations, and● Includes homeless or formerly homeless individuals. §578.5(b)	<ul style="list-style-type: none">● Implements via a vote of the official membership.● Delegates certain roles to the Board.● Reviews Board roster to assess representation.
	Consult with the Collaborative Applicant and HMIS Lead Agency to develop, follow, and annually update a Governance Charter that includes all HUD-required components <ul style="list-style-type: none">● §578.5(a)(5)	<ul style="list-style-type: none">● Reviews results of the Governance Charter review.● Approves changes to Governance Charter.● Implements via a vote of the official membership.

	Designate a single HMIS for the geographic area ³ §578.5(b)(1)	<ul style="list-style-type: none"> • Receives recommendations from the HMIS Lead Agency. • Provides oversight during the selection process.
	Designate an eligible applicant to manage the HMIS, referred to as the <i>HMIS Lead Agency</i> §578.5(b)(2)	<ul style="list-style-type: none"> • Consults with the Board and Collaborative Applicant regarding the designation of the HMIS. • Ratifies the selection of the HMIS.
	Comply with HUD Conflict of Interest Requirements §578.95 (b)	<ul style="list-style-type: none"> • Implement via a vote of the official membership. • Oversight of policy compliance.
Lead	Hold meetings of the full Membership with published agendas at least semi-annually. §578.7(a)(2)	<ul style="list-style-type: none"> • Ensures at least two meetings are calendared annually. • Collaborates with the Board on meeting agendas.
	Make an invitation for new members to join publicly available at least annually §578.7(a)(1)	Conducts a public call for new members.
	Coordinate the implementation of a housing and services system, including at a minimum: <ul style="list-style-type: none"> • Outreach, engagement, and assessment • Shelter, housing, and support services • Prevention strategies §578.5(c)(1)	Ensures coordination and delivery of a system including required components under the Interim Rule and locally adopted action.
Support/Lead	Appoint committees, subcommittees, or workgroups as deemed necessary §578.7(a)(4)	<ul style="list-style-type: none"> • Support: Responds to calls for committee participation as requested by the Board. • Lead: Establishes workgroups, as necessary, to accomplish responsibilities assigned to the Membership.
Support	Plan and conduct a Point-In-Time Count (PITC) throughout the CoC geographic area at least biennially §578.5(c)(2)	Assists in planning and implementation of the annual ⁴ PIT Count in support of the Collaborative Applicant and PIT Count Committee under Board oversight.
	Conduct an annual gaps analysis of needs and services in the CoC geographic area §578.5(c)(3)	Assists in implementation and providing data for this task in collaboration with the HMIS Lead Agency and Subcommittee.

Locally Defined Roles and Responsibilities

The following table identifies **Locally Defined Roles and Responsibilities** of the CoC Membership:

Level of Responsibility	Activity	Implementation/Operation
Authority/ Oversight	Elect Provider and At-Large seats as present on a slate of candidates for the Board	Elect representatives for Provider and At-Large seats as presented on a slate of candidates, annually and in accordance with Board seat turnover rules. <ul style="list-style-type: none"> • Ratify representatives presented for appointed seats.

³ Victim Service Providers, by regulation, participate in a comparable database rather than the central HMIS data base.

⁴ CoC currently conducts an annual PITC of both sheltered and unsheltered persons.

Chapter 3

CoC Board

Contents

Introduction	2
References	2
CoC Governance and Oversight	2
CoC Board Purpose	3
CoC Board Composition and Selection	3
Board Member Alternates	5
Eligibility to the CoC Board	6
Solicitation for Open Board Positions	6
Elections	7
Terms	7
Attendance and Quorum	8
Meeting Procedures and Decision-Making	8
Duties and Responsibilities of CoC Board Members	9
Board Officers	10
Officer Terms	10
Duties	10
Vacancies and Removal (Officers)	11
Roles and Responsibilities	12
Roles and Responsibilities of the CoC Board	12
Locally Defined Roles and Responsibilities	14

Introduction

Continuums of Care (CoCs) have various operational responsibilities as mandated by regulation. A core responsibility is to adopt and follow a written process to establish a Board to act on behalf of the CoC. This written process must be reviewed, updated, and approved by the CoC at least once every five (5) years. CoC Boards must be representative of the relevant organizations and projects serving persons who are homeless, as well as include homeless or formerly homeless individuals.

This chapter addresses the roles, responsibilities, protocols, and practices related to the CoC Board.

References

The following references are applicable to the information in this chapter:

- 24 CFR 578.7(a)(3). Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH Act): Continuum of Care Program, 77 Fed. Reg. 45422, July 31, 2012 (codified at 24 CFR §578) (referred to as the CoC Program Interim Rule).
- Ralph M. Brown Act: California Government Code § 54950, 1953.

CoC Governance and Oversight

The San Bernardino City and County Continuum of Care (SB CoC) governance structure will consist of the following:

- General Membership
- CoC Board
- CoC Collaborative Applicant
- Coordinated Entry System (CES) Lead Entity
- Homeless Management Information System (HMIS) Lead Agency
- Associated Standing and Ad Hoc committees, and workgroups

Together, these structures must accomplish the community responsibilities defined in the CoC Program Interim Rule. Additionally, the Ralph M. Brown Act in California (Brown Act) governs local agencies, legislative bodies of local government agencies created by state or federal law and any standing committee of a covered board or legislative body, and governing bodies of non-profit corporations formed by a public agency. The intent of the Brown Act is to ensure transparency and inclusion in actions taken by legislative bodies. The CoC Membership body is a community-based forum, not a legislative body, therefore it is not subject to the Brown Act. The CoC Board, however, is a legislative body as defined in the Brown Act and must comply with the provisions of the Brown Act with regard to public notice, meeting protocols and voting rules.

The SB CoC will strive to ensure broad geographic coverage on the CoC Board and committees. Governance representatives should consist of stakeholders with diverse backgrounds, responsibilities, experiences, and identities so as to include the opinions and insights of various parties.

Because of the geographic size of the SB CoC, representation on the CoC Board needs to reflect the geographic regions. The regions are designated as follows:

Region	Cities/Communities		
Desert	<ul style="list-style-type: none"> Adelanto Apple Valley 	<ul style="list-style-type: none"> Barstow Hesperia 	<ul style="list-style-type: none"> Victorville
Central Valley	<ul style="list-style-type: none"> Colton Fontana Grand Terrace Highland 	<ul style="list-style-type: none"> Highland Loma Linda Redlands 	<ul style="list-style-type: none"> Rialto San Bernardino Yucaipa
East Valley	<ul style="list-style-type: none"> Needles 	<ul style="list-style-type: none"> Twentynine Palms 	<ul style="list-style-type: none"> Yucca Valley
Mountains	<ul style="list-style-type: none"> Big Bear Lake Crestline* 	<ul style="list-style-type: none"> Lake Arrowhead* 	<ul style="list-style-type: none"> Running Springs*
West Valley	<ul style="list-style-type: none"> Chino Chino Hills 	<ul style="list-style-type: none"> Montclair Ontario 	<ul style="list-style-type: none"> Rancho Cucamonga Upland

Note: Regions include each city's surrounding unincorporated communities.

* = Unincorporated communities isolated from cities.

CoC Board Purpose

The role of the CoC Board is to represent the CoC membership by guiding efforts to ensure community-wide commitment to preventing and ending homelessness. The CoC Board will serve as the primary decision-making body for the SB CoC. To this end, the CoC Board will approve and oversee policy and direction in accordance with the responsibilities delegated to it by the CoC membership.

CoC Board Composition and Selection

The CoC Board is composed of persons selected via the authorized process to represent the CoC stakeholders and participate as the CoC Board as required by the CoC Program Interim Rule. There are two basic processes for nomination of Board Candidates for selection by the CoC Membership and establishing CoC Board Membership:

1. Appointment into a designated seat and ratification.
2. Recommendation, review, and election for all other seats.

The CoC Board is composed of no less than 17 and not more than 21 members, consisting of 19 voting seats and two (2) non-voting seats. Seats will be held by members representing service providers, local investors, government, consumers, and other community stakeholders whose interests and experiences relate to homeless services and housing systems within the geographic boundaries of the SB CoC.

The two non-voting seats will include a high-ranking representative from the Collaborative Applicant and the immediate past Chair (in good standing). The role of the ex-officio Chair is to provide context and continuity to inform the CoC Board and will serve for a one-year term following the completion of their term of service. The organization chosen as the Collaborative Applicant will also serve in the role of the Secretary and is responsible for assigning a staff person to fulfill this role.

No more than one staff person and/or CoC Board Member of a single agency/organization may be an elected member of the CoC Board, excluding persons who are elected under the “homeless or formerly homeless” CoC Board seat. This seat will not be counted as a representative of a particular service provider.

The seated CoC Board must equitably represent the identified geographic regions. Equitable representation does not require an equal number of representatives for each region. The Nominating Committee Review process will evaluate the balance of factors included on the Board Matrix Form as well as environmental factors such as level of homelessness in each region.

CoC Board Seats will be categorized as one of the following:

- At-Large Representatives
- At-Large Consumer Representatives
- Governmental Agencies
- Service Providers

Voting Board Membership will consist of the following:

- Six (6) Governmental designated seats
- One (1) appointed seat
- No less than ten (10) and no more than 12 elected seats, consisting of:
 - Not less than five (5) and no more than six (6) At-Large representative seats
 - Not less than five (5) and no more than six (6) Service Provider seats

There are two basic processes for selecting Board Candidates by the CoC Membership:

- Appointment into a designated seat with ratification by the CoC Membership or
- Election through a Nominating Committee process of review, creation of a ballot of candidates, and election by the CoC Membership.

At-Large Representatives

At-Large representatives are professionals who work in systems that interact with the homeless response system such as (but not limited to) health care, mental health, school districts, child welfare, workforce development, criminal justice, business, faith community, victims service providers, housing developers, advocacy agencies, and landlords. The role of the At-Large Representative is to assist the CoC in leveraging mainstream funding from, and making positive changes within, those systems for the benefit of people experiencing homelessness in our region. The Director of a Housing Authority in the San Bernardino CoC area will be included in this group of representatives. Members representing At- Large Representative seats will be elected through the nominations and selection process.

Consumer Representative

At-Large Consumer representatives are people who have lived experience with homelessness and/or housing instability, and/or have received services through a homeless assistance program. One of the At-Large Consumer representative seats will be dedicated to a member appointed by the Youth Action Board (YAB). The second At-Large Consumer seat should be considered for persons of color, LGBTQ+ persons, persons with HIV+ diagnosis, survivors of domestic violence, or those with a history of chronic homelessness. The member representing the second seat will be selected by the

CoC from a list of candidates reviewed by the Nominating Committee. Members representing At- Large Service Provider seats will be elected.

The role of the At-Large Consumer representative is to help ensure that CoC Board decisions include the perspective of people that have experienced homelessness firsthand. Persons filling these seats who have experienced homelessness within the past 2 years will be compensated for their work with the CoC. The value of compensation is set by the CoC Board as supported by available CoC funds.

Governmental Representatives

The six (6) governmental designated seats will consist of the following persons:

- Elected Member from the San Bernardino County Board of Supervisors, or designee
- Elected Leader from a Key Stakeholder City⁵, or designee
- Senior Leader from San Bernardino County Community Revitalization
- Senior Leader from San Bernardino County Human Services
- Senior Leader from the San Bernardino County Superintendent of Schools or Board of Education
- Government Representative elected through the CoC Nominating process

The role of the Governmental Representative is to assist in elevating the CoC by ensuring accountability, countywide strategy alignment, coordination of investment planning, and amplification of CoC activities. Each Board Member appointed to a governmental seat should have the fiscal and/or program authority of the organization they represent to ensure decision making ability. The appointing entity is encouraged to fill the seat with a person who possesses a strong level of understanding about the operations of the CoC's homeless system of care. At least one member of the Board will be from a direct recipient of the Emergency Solutions Grant (ESG) funds.

Members representing the Governmental seats will be filled through appointment by the entity represented on the CoC Board. The appointees will be included on the slate of Board candidates selected through the nominations process and presented to the CoC Membership. The combined results of the appointments and the representatives selected by election will be presented to the CoC Membership for ratification.

Service Providers

Service Provider representatives are people who work for organizations that provide services for people experiencing homelessness. Representatives should be from a mix of state or federally funded homeless programs and non-funded agencies. Board Members selected under the Service Provider Seats represent one or both of the types of direct service outlined below:

- Crisis Response System - Includes emergency and transitional shelter, homelessness prevention, outreach, navigation, coordinated access, day services and crisis response services.
- Permanent Housing - Includes permanent housing provision (PSH/RRH) and/or services for people in permanent housing.

Board Member Alternates

Board Members may assign a designee to participate or vote on their behalf. ~~The alternate or designee will be identified at the time of the Board Member election. Since~~

seats are representative of various constituencies, alternates should represent the Board Seat designation/constituency, rather than an individual agency.

Eligibility to the CoC Board

To be considered for an CoC Board seat, all appointees and nominees will affirm they:

- Accept the appointment/nomination to represent the interests of the appointing/nominating entity;
- Commit to active participation in at least one committee or work group; and
Commit to participate in CoC Board training and onboarding, which may include shadowing/mentoring/buddy system with an existing member at the request of the new member.

The CoC Membership will annually convene an ad hoc Nominating Committee⁶ for the purposes of:

- Reviewing the Board matrix;
- Identifying under-represented sectors;
- Recruiting prospective members;
- Reviewing applications;
- Putting forward to the CoC membership a ballot of candidates for election that describes the potential representation of each of the targeted constituencies and geographies;
- Calling for the vote for the election of CoC Board Members;
- Tallying the votes and preparing a slate of a candidates receiving the highest number of votes in each representative category, or appointed by into the government-dedicated seats.

Additional factors to be considered in the selection of potential Board Members include the individual's commitment to the purposes of the CoC Board, as well as personal and professional qualifications including interest and capacity, leadership and collaboration skills, knowledge, vision, and depth of connection to the CoC membership and the broader community responding to homelessness. The Nominating Committee will use the Board Matrix to suggest a slate of candidates that best ensures inclusion of each key stakeholder group (characteristic).

Specific consideration will be given to the region from which the nominee identifies. No single entity may be represented by more than two members on the CoC Board while no more than one staff person and/or Board Member of a single agency/organization may be an Elected Member of the CoC Board. Individuals seeking a competitive seat on the CoC Board are not eligible to participate on the Nominating Committee.

Solicitation for Open Board Positions

Solicitation for open Board positions will begin no less than six weeks before the annual meeting in which elections will occur. The Collaborative Applicant, on behalf of the Nominating Committee will broadly circulate a "Call for Applications" to the appropriate organizations and parties. The Call for Applications will set forth the:

- Criteria for appointment to the CoC Board; and
- ~~Deadline for the receipt of said applications.~~

⁶ See Charter Chapter: Committees for more information on the Nominating Committee.

Any individual CoC member in good standing may apply for an open Board position by responding to the Call for Applications and submitting, by the posted deadline, a/an:

- Completed application;
- Brief biographical summary;
- Personal statement summarizing the perspective(s) that the nominee would bring to the CoC Board; and
- Letter of Recommendation from a SB CoC member organization or individual.

A member is considered in good standing if they have:

- At least two years of experience working or volunteering in the homeless sector or within the SB CoC;
- Been a regular participant in CoC related committees/meetings; and
- Had a track record of a commitment to working to alleviate homelessness in the region.

The Collaborative Applicant will collect and conduct a threshold validation of the submitted applications and provide to the Nominating Committee the full list of applicants with an indication as to if the candidate meets the minimum threshold requirements. The Nominating Committee will further review the list of applicants against the list of Board Member priorities and determine a slate of qualified applicants. The summaries (including candidate biographies, applications, personal statements, and letters of recommendation) of each of the qualified applicants will be forwarded to the full CoC membership no later than two (2) weeks prior to the meeting at which the election of new or reelected Board members will occur.

Elections

Board Members will be elected/re-elected individually by the SB CoC voting membership present at the designated meeting. Ballots will be arranged by Service Providers, At-large Representatives and At-large Consumer Representatives categories.

In the event of a contested seat, the highest vote-getter(s) will be elected. In the event of a tie vote for one or more available seats, the CoC Board will select a nominee from the tie-getting candidates. An emphasis will be placed on the promotion of diversity in terms of expertise, experience, race, ethnicity, cultural affiliation, gender, sex, gender identity, sexual orientation, disability, and other relevant factors such as subregional representation.

Board Members recommended for appointment, including those to hold the governmental seats and the youth At-Large Consumer seat, will be presented as a slate by the Nominating Committee for ratification by the full membership.

Terms

The membership body elects Board Members to a two-year term beginning January 1

and ending December 31 of the following year. Elections will be held at the annual meeting of the full membership or in a specially called meeting, as necessary. Note, during the first year of transition, the elections may be held anytime during the calendar year at a meeting identified for this purpose by the CoC Membership.

Both elected and appointed Board Members are eligible to serve up to two (2) consecutive terms, subject to CoC selection process approval. The selection process for second term Board Members will include submission of an updated resume/biographical summary to allow the Nominating Committee to create a current Board Matrix. Elected Member terms will be staggered such that approximately one third (less one) of the elected Board Members will be elected each year. After completing two (2) consecutive elected terms, an individual/organizational member must wait one (1) year before serving another elected term on the CoC Board.

Attendance and Quorum

Board Members may not miss more than two consecutive or three total, unexcused CoC Board meetings during their term year. The presence of a majority of Board Members will be a quorum and sufficient to conduct business at CoC Board meetings.

Meeting Procedures and Decision Making

The SB CoC Rules of Decorum, founded on the principles of Roberts Rules of Order, will be followed to open, and close each meeting and to bring a motion to the floor. The CoC Board will operate on a consensus decision-making model. If consensus cannot be achieved, a decision will be made by a majority vote of those attending the meeting in which a quorum was initially present. Each Board Member with designated voting authority is eligible to vote on decisions being made when present at the meetings. Virtual participation will be allowed in accordance with the Brown Act. A majority of a quorum of the Board members present is necessary for resolutions or votes to pass.

The CoC Board may take an action without meeting the majority of a quorum when the Rule of Necessity is invoked. The common law Rule of Necessity (Rule) can be applied to Brown Act meetings. The Rule is codified in Government Code section 87101 to allow legally required participation when a quorum is lost due to conflicts of interest¹. The need for the Rule may be verified and invoked by Board Officers (Chair, Vice Chair, and Secretary/Collaborative Applicant). A record of the reason the Rule had to be invoked, and each action taken using the Rule will be created by the CoC Board and maintained by the Secretary/Collaborative Applicant. Use of the Rule should be rare. If invoked more than three (3) times in a calendar year, the Board will research the factors leading to the lack of an eligible voting quorum and will recommend actions to remedy the repeated need for invoking the Rule.

A record of each action taken without a CoC Board meeting will be created by the CoC Board and maintained by the Collaborative Applicant/Secretary.

Vacancies and Removal

Resignation by a member from the CoC Board must be in writing or via email and received by the Board Chair and the Collaborative Applicant. An announcement will be made

¹ See reference in County Counsel email of March 22, 2024.

regarding the open position at the next CoC Board and General Membership Meeting requesting nominations.

Expected vacancies occur through Board Seat rotation at the end of a representative's full term. When a representative resigns or is removed from the CoC Board and cannot serve a full term, the vacancy will be filled as quickly as possible. In the case of an appointed representative vacating a seat, the authority making the appointment will appoint a new representative. In the case of an elected representative vacating a seat, the Board Chair will nominate, and the CoC Board ratify by majority vote, his/her replacement to fill the unexpired portion of the term. The CoC Board should maintain a focus on promoting Board diversity as new members are added. After completing the partial term, the newly elected Board Member will be eligible to serve up to two consecutive terms of two (2) years each.

Board Members may be removed from the CoC Board for:

- Violations of the:
 - Code of Conduct;
 - Conflict-of-Interest policy; or
 - Attendance policy;
- Failure to:
 - Perform CoC Board duties; or
 - Comply with this Charter and/or applicable policies; or
- Other violations of the policies and procedures of the SB CoC.

Consideration of member removal will begin with a review of the potential violation by the CoC Chair, Vice Chair and Secretary. If the member under review is an officer (Chair, Vice Chair, or Secretary), they will recuse themselves from the review process. Upon completion of the review and consensus that the removal is warranted, the Board Member subject to removal will have the opportunity to resign and forego bringing the issue to the full Board for a vote. If the Board Member declines to resign, the Board Officers will present the issue to the CoC Board for review and vote. Removal of a Board Member requires a 2/3 vote of active Board Members, not including the vote of the member who is the subject of the removal proceedings. The process for replacement of a Member that is removed will follow paragraph one of this section above. If the Board Chair is removed, the Vice Chair will nominate the replacement and the CoC Board will ratify.

Duties and Responsibilities of CoC Board Members

In accepting the appointment or election to the CoC Board, members acknowledge they understand the role and responsibilities they are committing to and agree to make their Board Membership a priority. They further commit to:

- Support the Mission, Vision, and Goals as established in the CoC action plans;
- Offer their expertise to help ensure the success of the CoC system implementation;
- Work collaboratively with the other Board Members to ensure an understanding of all current agenda items and issues to be addressed to actualize system improvements;
- Ensure accountability, transparency, and responsiveness to community needs;
- Productively engage with jurisdictional/governmental stakeholders for cross-system leadership;
- Attend a majority of CoC-related community meetings to hear from and communicate

with the membership and stakeholders, and to help determine and track progress on goal achievement.

- Actively participate in at least one CoC Board committee or work group; and
- Adhere to the CoC Board's Code of Conduct, Conflict of Interest, and Confidentiality and Privacy policies.

Board Officers

The SB CoC Board will consist of three officers – Chair, Vice-Chair and Secretary. The Board of Directors will elect the Chair and Vice Chair, as needed, to fill a vacant seat at their first regular meeting of the fiscal year. The Chair and Vice Chair may not represent the same organization. The selected officers should possess strong leadership ability and personal characteristics that will lead to the greatest success in their roles. The CoC Board will strive to elect Officers who represent different sectors/constituencies. It is preferable that one position represents an agency that does not receive CoC funding, including recipients or subrecipients. The Secretary position will be a non-voting ex-officio and filled by a member of the Collaborative Applicant staff to provide administrative continuity.

The Collaborative Applicant will promptly announce election results to the membership by email.

Officer Terms

All Board Members can be elected to serve up to two consecutive two-year terms. Board Officers will be elected for a two (2) year term and are eligible to serve up to two consecutive terms within their term limits. The Board Chair and Vice Chair may complete their current term as an officer if their term as a Board member is reached while in office. After completing two (2) consecutive terms, an officer must wait one (1) year before serving another elected term as an officer of the CoC Board except in the case of the Vice-Chair, who is eligible to serve up to one additional consecutive term in the role of Chair regardless of that officer's Board term limit. An individual waiting a year from an officer position may, if elected and otherwise eligible, chair a committee during the interim year. An outgoing Board Chair may remain on the CoC Board for up to one year as a non-voting emeritus member regardless of term limits.

Duties

Chair

The Chair of the CoC Board is responsible for ensuring that the Board meets as scheduled and that the CoC Membership Facilitator convenes the Membership at least three (3) times annually. The Chair presides at the CoC Board meetings. The Chair will sign required and/or necessary documents on behalf of the SB CoC, except as provided elsewhere in the Charter for the Collaborative Applicant/Administrative Entity, the HMIS Lead Agency, and the CES Lead. In collaboration with the Vice Chair and Secretary and in consultation with the Board Members, the Chair is responsible for setting the Board meeting agenda. The Chair will provide direction and leadership, along with the Board, to ensure that all functions of the SB CoC are carried out. The Chair will ensure meaningful participation and adequate time for presenters to share information and members to process the information and seek clarity. The Chair has the responsibility for holding Board Members accountable for their individual roles and commitments. They also act as a liaison to the

Public Entity Stakeholder's Advisory Committee **or** other governmental stakeholder groups. The Chair will be authorized to speak, or assign someone to speak, publicly on behalf of the CoC.

Vice-Chair

The Vice Chair will support the Chair. In the absence of the Chair, the Vice Chair assumes the Chair's duties. The Vice Chair will perform other duties as designated by the CoC.

Secretary

The Secretary is responsible for keeping accurate records of the acts, proceedings, and attendance of all meetings of the CoC Board and full membership meetings. Responsibilities include recording actions taken without a meeting. They will have (or designate) the responsibility for giving notice of meeting dates, times, and locations, managing the attendance rolls, maintaining the roll of eligible voters, and collecting the official minutes of other CoC related meetings, including standing and ad hoc committees. The Secretary is responsible for ensuring the meeting minutes are posted on the CoC website in a timely manner. The Secretary will provide support to the Board Chair and Vice Chair as necessary and may chair CoC meetings in the absence of both the Chair and the Vice Chair. This position will be assigned by a senior leader from the Collaborative Applicant entity and is a non-voting Board Member.

Vacancies and Removal (Officers)

When the elected CoC Board Chair or Vice Chair resigns or cannot serve a full term for any reason, the remaining Board Members will call a special election to fill the unexpired term.

In the rare instance that a Board Members may be removed for cause, a Board Member removal process will be invoked. This process will begin with internal CoC Board action to remedy the cause, before elevating the issue to the Membership, Counsel, or law enforcement as warranted.

Roles and Responsibilities

Roles and responsibilities of the CoC Board include the following:

- **Regulatory Roles and Responsibilities:** Identified through federal and state regulation.
- **Locally Defined Roles and Responsibilities:** Delegated by the Membership.

There are three basic levels of responsibility:

- **Authority/Oversight:** Provides authority or oversight of a specific activity. Authority indicates the group with a formal vote as the responsible/approving body. Oversight indicates that reports and information will be provided to this body by another component.
- **Lead:** Charged with leading the action to implement the responsibility in accordance with the HUD regulations, CoC policies, and procedures. The Lead works closely with support structures to realize the vision for CoC system of care. The Lead works collaboratively within the structure to coordinate and operationalize the area of responsibility.
- **Support:** Is consulted and/or an active participant in carrying out a HUD regulation in

collaboration with other structures and systems. These entities join the Lead in taking the action by providing expertise, information, and/or commitment to implementation.

Roles and Responsibilities of the CoC Board

The following table identifies **Regulatory Roles and Responsibilities** of the CoC Membership as per Title 24 of the Code of Federal Regulations (CFR), and is organized by Level of Responsibility:

Level of Responsibility	Activity	Implementation/Operation
Authority/ Oversight	Hold meetings of the full Membership with published agendas at least semi-annually §578.7(a)(1)	<ul style="list-style-type: none"> Ensures Membership meetings are scheduled by the CoC Facilitator. Collaborates with Membership leaders regarding meeting agendas.
	Make an invitation for new members to join publicly available at least annually §578.7(a)(2)	<ul style="list-style-type: none"> Ensures the Membership makes a public call for members at least annually.
	Appoint committees, subcommittees, or workgroups as deemed necessary §578.7(a)(4)	<ul style="list-style-type: none"> Appoints groups in accordance with established policies to accomplish responsibilities. Receives/oversees Board subcommittee reports.
	Consult with the Collaborative Applicant and HMIS Lead Agency to develop, follow, and annually update a Governance Charter that includes all HUD-required components §578.5(a)(5)	<ul style="list-style-type: none"> Consults with the Collaborative Applicant and HMIS Lead to develop the Charter. Ensures the Charter meets all HUD requirements. Announces the results of the CoC Charter actions to the Board.
	Consult with CoC recipients and subrecipients to establish performance targets, monitor performance, evaluate outcomes, and take action against poor performers	<ul style="list-style-type: none"> Oversees consultation with CoC recipients and sub recipients. Uses subcommittees or standing committees in collaboration with the Collaborative Applicant to set

	§578.5(a)(6)	<p>standards and performance monitoring requirements.</p> <ul style="list-style-type: none"> • Votes to adopt the results of the consultation process.
	Consult with recipients of ESG program funds to establish and operate a Coordinated Entry System (CES) in accordance with HUD standards §578.5(a)(8)	<ul style="list-style-type: none"> • Oversees the consultation with the HMIS Lead and ESG recipient jurisdictions. • Votes to establish the CES system design, policies, and procedures. • Receives CES reports. • Oversees the required annual review. • Assesses the operation by the CES Lead in partnership with the Collaborative Applicant. • Develops the CES Lead MOU in consultation with Collaborative Applicant.
	Designate an eligible applicant to manage the HMIS, referred to as the HMIS Lead Agency §578.5(b)(2)	<ul style="list-style-type: none"> • Selects the HMIS Lead Agency in accordance with procurement and established policies. • Receives HMIS reports and data standards from the HMIS Lead. • Oversees HMIS Lead Agency performance as described in the HMIS MOU).
	Ensure consistent participation in HMIS by CoC, ESG and State-funded CoC project recipients and subrecipients §578.5(b)(4)	<ul style="list-style-type: none"> • Receives reports, data, and HMIS standards and policies from the HMIS Lead Agency. • Ensure participants are supported by the Collaborative Applicant and ESG recipient jurisdictions.
	Ensure HMIS is administered in compliance with HUD standards and policies §578.5(b)(5)	<ul style="list-style-type: none"> • Assesses HMIS implementation. • Reviews compliance with HUD standards. • Develops and authorizes an MOU with the HMIS Lead Agency (supported by Collaborative Applicant).
	<p>Coordinate the implementation of a housing and services system, including at a minimum:</p> <ul style="list-style-type: none"> • Outreach, engagement, and assessment • Shelter, housing, and support services • Prevention strategies <p>§578.5(c)(1)</p>	<ul style="list-style-type: none"> • Establishes policies. • Oversees system design. <p>The Membership is responsible for implementation and is supported by the Collaborative Applicant.</p>
	Plan and conduct a Point-In-Time (PIT) Count throughout the CoC geographic area at least biennially §578.5(c)(2)	<ul style="list-style-type: none"> • Authorizes the PITC and implementation plan. • Collaborates with HMIS Lead for submittal in HUD Data Exchange (HDX).
	Conduct an annual gaps analysis of needs and services in the CoC geographic area §578.5(c)(3)	Authorizes and plans the gaps analysis.
	Provide information required to complete the Consolidated Plan(s) in the CoC geographic area §578.5(c)(4)	<ul style="list-style-type: none"> • Ensures compliance with HUD requirements. • Implements the process of providing information the jurisdictions through

		the Collaborative Applicant, supported by subcommittees and others as needed to gather and report data.
	Consult with State and local government ESG program recipients to plan the allocation of funds and report on and evaluate the performance of subrecipients §578.5(c)(5)	<ul style="list-style-type: none"> • Implements thorough the Collaborative Applicant. • Receives information. • Approves release of data. • Supported by ESG area representatives.
Authority/ Oversight (in collaboration with ESG recipients)	Consult with recipients of ESG program funds to establish and consistently follow written standards for providing assistance §578.5(a)(9)	<ul style="list-style-type: none"> • Oversees consultation with the ESG recipient jurisdiction(s) • Votes on written standards (including policies and procedures) for setting system level priorities and providing assistance in compliance with regulation.
	<ul style="list-style-type: none"> • Evaluate outcomes of projects funded by CoC and ESG, as well as State-funded CoC homelessness projects • Make reports to the funding source as necessary §578.5(a)(7)	<ul style="list-style-type: none"> • Establishes the project evaluation process. • Ensures project implementation through the Collaborative Applicant and Subcommittee Lead; Consults with the ESG recipient jurisdiction(s) as necessary. • Reports results to the funding source.
Lead	Establish the Continuum of Care §578.5(a)	<ul style="list-style-type: none"> • Collaborates with the Membership to establish a regionwide membership. • Reviews the membership roster for inclusion of relevant/required stakeholders.
	Establish a CoC Board that: <ul style="list-style-type: none"> • Is representative of the relevant organizations and of projects serving homeless subpopulations, and • Includes homeless or formerly homeless individuals. §578.5(b)	<ul style="list-style-type: none"> • Collaborates with the Membership to ensure annual review of the Board Membership to ensure inclusive representation using the processes identified in the Charter. • Ensures the Membership reviews the selection process at least once every five (5) years.
	Comply with HUD Conflict of Interest Requirements §578.95 (b)	Ensures implementation of CoC Policy with support from the Collaborative Applicant.

The following table identifies **Locally Defined Roles and Responsibilities** of the CoC Membership:

Level of Responsibility	Activity	Implementation/Operation
Authority/ Oversight	Review the performance of HMIS and CES	Annually review the performance of HMIS and CES based on the terms of the written MOUs and HUD guidance, as applicable.
	Consult with the public entity/ governmental advisory group and ESG recipients to establish and consistently follow written standards for providing assistance	Ensure on-going consultation with ESG recipients with the Collaborative Applicant as the Lead Entity.

Lead	Ensure review the performance of the Collaborative Applicant	Annually ensures the review of the performance of the Collaborative Applicant and Administrative Entity in accordance with the MOU.
	MOU with CES, Collaborative Applicant, Administrative Entity	Establish through an MOU, the authorities delegated to the CoC Lead Agency to act as the Collaborative Applicant and Administrative Entity.
	Memorandum of Understanding	Designate an HMIS Lead Agency that is ratified by the CoC Membership.
	Consult with State and local government ESG recipients to plan the allocation of funds and report on and evaluate performance of subrecipients.	Partner with HMIS, CES, the Collaborative Applicant and ESG recipients to plan, review, and evaluate performance of recipients of CoC-allocated ESG and State funds. (Upon request, may support ESG recipients review of CoC direct fund recipient agencies.)
Support	CoC Committees and Workgroups	Supports committees and workgroups as identified and requested by the CoC.

Chapter 4

HUD Collaborative Applicant and State Administrative Entity

Contents

Introduction	2
References	2
Purpose	2
Terms of Service	4
Performance Standards/Memorandum of Understanding	4
Roles and Responsibilities	5
Roles and Responsibilities of the Collaborative Applicant	5
Roles and Responsibilities of the Administrative Entity	8
Locally Defined Roles and Responsibilities	9
Chapter Appendix A	11
Chapter Appendix B	13
Chapter Appendix C	15

Introduction

Federal regulations for the Continuum of Care (CoC) Program require communities to comply with specific responsibilities as described in the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Interim Rule (24 CFR 578). One of the responsibilities of the CoC is to designate a legal entity as the Administrative Agent, who is also an eligible applicant, to apply for funds on behalf of the CoC. Federally this administrative agent is referred to as the “Collaborative Applicant.” Similarly, the State of California’s Housing and Community Development Department (HCD) and Health and Human Services Agency invest in local efforts to resolve homelessness. For these State programs, the Administrative Agent is called the “Administrative Entity.” The specific responsibilities of the Administrative Entity differ between the State funding programs. In each case, the Collaborative Applicant and/or Administrative Entity is expected to implement its responsibilities effectively and in compliance with the applicable regulations.

This chapter addresses the responsibilities and duties of the Collaborative Applicant and Administrative Entity.

References

The following references are applicable to the information in this chapter:

- Title 24 CFR part 578 - Continuum of Care Program, Interim Rule
- Title 24 CFR part 576 - Emergency Solutions Grant Program
- Title 22 CCR parts 8403, 8408, and 8409,
- Title 24 CFR 91.230, and
- State HSC 50406

Purpose

Designation of a Collaborative Applicant and an Administrative Entity provides a legal entity to act as the Administrative Agent to contract with federal and state public funding programs. This approach centralizes the planning, financial management, and reporting requirements in a single qualified agency to support the administrative capacity of the CoC. In many cases in California⁷, the Collaborative Applicant and Administrative Entity are vested in the same organization.

Collaborative Applicant

The Collaborative Applicant is the legal entity that contracts with HUD on behalf of the CoC and carries out a series of planning and reporting duties, including, but not limited to, managing the local CoC Competitive Application preparation and submittal process, ensuring project applicant compliance, and consultation with Emergency Solutions Grant recipients. The Collaborative Applicant is the only entity that can request CoC Planning Grant Funds and is the only applicant empowered to submit the CoC Consolidated Application and Project Priority Listing to HUD during the annual CoC Competition.

⁷ Nearly all of the 44 CoCs in California have identified the same administrative agency as both the CA and the AE.

The duties and responsibilities of the Collaborative Applicant can be found in the *Roles and Responsibilities of the Collaborative Applicant* section in this chapter.

Administrative Entity

The Administrative Entity carries out planning, contracting and reporting responsibilities for the portion of state funds awarded to the CoC. HCD requirements for organizations that are eligible to act as the Administrative Entity differ by program and between rounds of the same program in different years. For some programs, HCD has required the Administrative Entity to have experience as the HUD CoC Collaborative Applicant or have recent experience as an Emergency Solutions Grant (ESG) entitlement grant administrator. In many cases, the Administrative Entity is a unit of government.

Over the past decade, the State has allocated funds to various local organizations through several programs, such as Homeless Emergency Aid Program (HEAP), California Emergency Solutions and Housing (CESH), Homekey, multiple rounds of Homeless Housing, Assistance and Prevention (HHAP), and the Emergency Solutions Grant (ESG) programs. These programs offer allocations to certain jurisdictions and sometimes separately to CoCs. For each program, the State describes the requirements for identifying an “Administrative Entity” to manage the application process, plan activities, identify projects, submit reports and data to the State, and oversee use of the funds that are awarded for use in the local community.

The duties and responsibilities of the Administrative Entity are found in *Roles and Responsibilities of the Administrative Entity* section in this chapter.

Collaborative Applicant Responsibilities

In addition to the above, the CoC has delegated the following responsibilities to the Collaborative Applicant.

- Providing recommendations to the CoC Board for its final decisions.
- Keeping abreast of and informing the CoC Board on State homeless program requirements.
- Serving as a point of communication between State Offices and the CoC.
- Informing and educating the broader community about State solutions to address ending and preventing homelessness.
- Engaging in conversation related to outcome and performance data on the successes and challenges of people who are experiencing or have experienced homelessness.

Administrative Entity Responsibilities

State programs are governed by various regulations such as HSC 50406, 24 CFR91.230, 24 CFR 576 (ESG), and 42 USC sect. 11373. 22 CCR 8403, 8408, and 8409, The table in the *Roles and Responsibilities of the Administrative Entity* section summarizes the activities of the AE with regard to State homelessness funding allocated or awarded to the CoC⁸.

The regulatory references and the eligibility requirements associated with the State programs are found in the *Roles and Responsibilities of the Administrative Entity* section.

⁸ The State also allocates/awards funds to public entities, including the County of San Bernardino. These funds are administered at the sole discretion of the public entity to which they are awarded.

Terms of Service

The designation of the HUD Collaborative Applicant is valid for a maximum of three (3) years before it will be reviewed and approved by a vote of the CoC Board. There will be no requirement for a Request for Qualifications (RFQ). In response to negligence, poor performance or the desire of the Collaborative Applicant to not continue in the role, the CoC Board reserves the right to open an RFQ process to identify and designate a new Collaborative Applicant.

The State approves the Administrative Entity for the ESG program for two years. For other programs, the Administrative Entity is designated for the duration of the period of use of the award, subject to renewal or update in accordance with changes in program regulations or notices. The State publishes the eligibility criteria for Administrative Entity as part of the notices of funding opportunities.

Performance Standards/Memorandum of Understanding

The responsibilities of the Collaborative Applicant are documented in a Continuum of Care Collaborative Applicant Memorandum of Understanding.

The Collaborative Applicant Authorized Administrator is responsible for the execution of the MOU and the direct management of staff and resources to fulfill its duties. The CoC Board Chair and Vice Chair have the responsibility to review, update, and sign the MOU on behalf of the CoC. The MOU should contain all areas noted in this charter as under the purview of the Collaborative Applicant.

The CoC Board will review the performance of the Collaborative Applicant at least every three (3) years and publish a summary report of the outcome. The review will be based on the roles and responsibilities included in the MOU and the extent to which the Collaborative Applicant executes the duties. The designated entity may be terminated at the sunset of the MOU, upon mutual agreement, or for cause with a vote of two-thirds (2/3) of the CoC voting membership.

To effect a change in the organization selected to serve as the Administrative Entity for State funds allocated to the CoC, a recommendation for change must be supported by a two-thirds (2/3) vote of the Board and must comply with regulations at 22 CCR 8403.

At the time of creation and adoption of this charter, the San Bernardino City and County CoC (SB CoC) has designated the San Bernardino County Office of Homeless Services (OHS) as the Collaborative Applicant, Administrative Entity, and fiscal agent for federal, state, and local homeless funding under the CoC's purview. The Chief of OHS has been designated as the Authorized Administrator.

Roles and Responsibilities

Roles and responsibilities of the Collaborative Applicant and Administrative Entity include the following:

- **Regulatory Roles and Responsibilities:** Identified through federal and state regulation.
- **Locally Defined Roles and Responsibilities:** Delegated by the Membership.

There are three basic levels of responsibility:

- **Authority/Oversight:** Provides authority or oversight of a specific activity. Authority indicates the group with a formal vote as the responsible/approving body. Oversight indicates that reports and information will be provided to this body by another component.
- **Lead:** Charged with leading the action to implement the responsibility in accordance with the HUD regulations, CoC policies, and procedures. The Lead works closely with support structures to realize the vision for CoC system of care. The Lead works collaboratively within the structure to coordinate and operationalize the area of responsibility.
- **Support:** Is consulted and/or an active participant in carrying out a HUD regulation in collaboration with other structures and systems. These entities join the Lead in taking the action by providing expertise, information, and/or commitment to implementation.

Roles and Responsibilities of the Collaborative Applicant

The following table identifies Regulatory Roles and Responsibilities of the Collaborative Applicant as per Title 24 of the Code of Federal Regulations (CFR), and is organized by Level of Responsibility:

Level of Responsibility	Activity	Implementation/Operation
Authority/ Oversight	Apply for CoC and Planning Grant Funds §578.9	Prepare and submit the CoC Application and the Project Priority Listing for the national competition. (The Collaborative Applicant is the only entity allowed to apply for and receive CoC Planning Grant funds from HUD.)
Lead	Plan and conduct a Point-In-Time Count (PITC) throughout the CoC geographic area at least biennially §578.5(c)(2)	Collaborates with the Board and Committees to plan, implement, document and report on a PITC that is: <ul style="list-style-type: none">• Compliant with HUD standards, and• Supported by software vendors and consultants.
	Conduct an annual gaps analysis of needs and services in the CoC geographic area §578.5(c)(3)	<ul style="list-style-type: none">• Receives data from the CoC.• Reviews data quality.• Assesses disparities between available housing

		and services, use of resources, and needs. <ul style="list-style-type: none"> • Recommends system changes to fulfill goals.
	Provide information required to complete the Consolidated Plan(s) in the CoC geographic area §578.5(c)(4)	Collects and provides information related to homelessness as required by jurisdictions to complete their Consolidated Plan(s). ⁹
Support	Establish the Continuum of Care §578.5(a)	<ul style="list-style-type: none"> • Maintains membership records. • Assists with: <ul style="list-style-type: none"> – Communication. – Public notices. – Meeting preparation and/or facilitation.
	Establish a Board that: <ul style="list-style-type: none"> • Is representative of the relevant organizations and of projects serving homeless subpopulations, and • Includes homeless or formerly homeless individuals. §578.5(b)	<ul style="list-style-type: none"> • Maintains membership records. • Assists with: <ul style="list-style-type: none"> – Communication. – Public notices. – Meeting preparation and/or facilitation.
	Hold meetings of the full Membership with published agendas at least semi-annually §578.7(a)(1)	Offers assistance with: <ul style="list-style-type: none"> • Logistics. • Materials. • Announcements. • Attendance records. • Verification of voting privileges. • Verifying a quorum.
	Make an invitation for new members to join publicly available at least annually §578.7(a)(2)	<ul style="list-style-type: none"> • Assists with: <ul style="list-style-type: none"> – Communication. – Documenting invitations. – Collecting and compiling applications. • Provides a roster to the Membership and Board.
	<ul style="list-style-type: none"> • Adopt and follow a written process for Board Member selection • Review, update as necessary, and approve the process at least once every five (5) years §578.7(a)(3)	<ul style="list-style-type: none"> • Documents the Board Member selection process. • Tracks the review cycle and calendar. • Assists in ensuring the Board Member selection process is followed by Membership. • Assists with maintaining the roster and tracking term limits.

⁹ The Consolidated Plan typically covers a five (5) year span; however, Action Plans are required to be completed annually.

	Consult with the Collaborative Applicant and HMIS Lead Agency to develop, follow, and annually update a Governance Charter that includes all HUD-required components §578.5(a)(5)	<ul style="list-style-type: none"> • Consults with the Collaborative Applicant and HMIS Lead to develop the Charter. • Helps ensure the Charter meets all HUD requirements.
	Consult with CoC recipients and subrecipients to establish performance targets, monitor performance, evaluate outcomes, and take action against poor performers §578.5(a)(6)	<ul style="list-style-type: none"> • Assists with: <ul style="list-style-type: none"> – Consultation and coordination to ensure inclusion of committees and community stakeholders – Monitoring and evaluating recipient and subrecipient performance and outcomes. – Communication. • Documents the process and results. • Retains reports.
	Consult with recipients of ESG program funds to establish and operate a Coordinated Entry System (CES) in accordance with HUD standards §578.5(a)(8)	<ul style="list-style-type: none"> • Assists with the consultation coordination to ensure inclusion of ESG jurisdictional recipients. • Documents standards, priorities, policies, and assessment tools. • Assists in an annual system review. • Signs the approved MOU with the CES Lead Agency.
	Consult with recipients of ESG program funds to establish and consistently follow written standards for providing assistance §578.5(a)(9)	<ul style="list-style-type: none"> • Assists with consultation coordination with ESG jurisdictional recipients. • Documents written standards. • Assists subcommittees.
	Designate a single HMIS for the geographic area ¹⁰ §578.5(b)(1)	Assists the Membership and HMIS Lead Agency in selecting and documenting the HMIS and comparable databases.
	Designate an eligible applicant to manage the HMIS, referred to as the HMIS Lead Agency §578.5(b)(2)	Assists the Board in documenting the selection of the HMIS Lead Agency.
	Ensure consistent participation in HMIS by CoC, ESG and State-funded CoC project recipients and subrecipients §578.5(b)(4)	<ul style="list-style-type: none"> • Helps coordinate with ESG representatives, • Assists the HMIS Lead in communication with CoC and ESG recipients and subrecipients.

¹⁰ Victim Service Providers, by regulation, participate in a comparable database rather than

	Ensure HMIS is administered in compliance with HUD standards and policies §578.5(b)(5)	Assists the: <ul style="list-style-type: none"> • Board with HMIS review. • HMIS Lead Agency in implementation (e.g., communication and logistics) of and documenting the HMIS MOU.¹¹
	Coordinate the implementation of a housing and services system, including at a minimum: <ul style="list-style-type: none"> • Outreach, engagement, and assessment • Shelter, housing, and support services • Prevention strategies §578.5(c)(1)	Assists: <ul style="list-style-type: none"> • The Board and Membership in designing, implementing, and documenting the CoC system. • With communication, reporting, assessment, and record retention.
	Comply with HUD Conflict of Interest Requirements §578.95 (b)	Assist the Membership, Board, and committees to ensure implementation of CoC Policy.

Roles and Responsibilities of the Administrative Entity

The following table identifies **Regulatory Roles and Responsibilities** of the Administrative Entity¹², and is organized by Level of Responsibility.

Level of Responsibility	Activity	Implementation/Operation
Authority/ Oversight	Contract for Funding	Signs contracts with State agencies) to receive CoC portions of State homeless program funds awarded by the State.
	HDIS Participation	Ensures HMIS data is reported to HDIS system.
	Communications – Point of Contact	Serves as a point of communication between State Offices and the CoC.
	Subrecipient Project Management	Prepares, signs, and oversees contracts and fiscal compliance of subrecipients for projects approved by the CoC and State funding source.
	Grant Administration	Designs, contracts, and manages planning and administrative activities of funds associated with State homelessness programs.
Lead	Application for Funds	<ul style="list-style-type: none"> • Prepares and submits applications for State-funding allocated to the

¹¹ Ensure compliance with Conflict of Interest policies are followed during development of the MOU and subsequent assessment, if the recommended HMIS Lead Agency is the Collaborative Applicant.

¹² The State programs are governed by various regulations such as 22 CCR 8403, 8408, 8409, HSC 50406, 24 CFR91.230, 24 CFR 576 (ESG), and 42 USC sect. 11373. *Chart C*. in the Appendix indicates the major regulations tied to Administrative Entity responsibilities.

		<p>CoC, as directed by the Board.</p> <ul style="list-style-type: none"> Verifies all components of an application are completed as directed by the funding source announcement.
Support	Planning	Supports completion of local planning processes as required by the specific State funding source for CoC allocation.
	Fiscal Compliance	Receives, expends, bills, and tracks funding to meet the terms and conditions of the State contract(s).

Locally Defined Roles and Responsibilities

The following table identifies **Locally Defined Roles and Responsibilities** of the Collaborative Applicant and Administrative Entity:

Level of Responsibility	Activity	Implementation/Operation
Authority/ Oversight	CoC Application Process	Manages a coordinated, inclusive, and outcome-oriented community process for the solicitation, objective review, selection, reallocation, and ranking of project applications.
Lead	Board Participation – Board Secretary	<ul style="list-style-type: none"> CA selects a staff to serve in the role of Secretary of the CoC Board. Prepares and retains reports and documents.
	CoC Membership Application	<ul style="list-style-type: none"> Manages the CoC membership application process. Maintains the roster of eligible voters.
	Regulatory Compliance – Updates and Changes	Tracks and notifies the CoC Membership and Board of HUD regulatory changes.
	Annual System Reporting	<p>Receives data and ensures submittal of all required reports for the CoC including, but not limited to:</p> <ul style="list-style-type: none"> CoC Program Registration Grant Inventory Worksheets Point-In-Time Count Housing Inventory Chart Longitudinal Systems Analysis HUD System Performance Measures
	Offers expertise and leadership as liaison to advisory groups to ensure the success of the CoC.	Engages with advisory groups related to outcome and performance data on the successes and challenges of people who are experiencing or

		have experienced homelessness.
Support	Board Composition and Selection Process	Supports selection of Service Provider and At-Large seats by supporting the development of a slate of candidates as Board members during the CoC process.
	CoC Communications	Provides logistical and communications support to the CoC Board and committees, including: <ul style="list-style-type: none"> Disseminating meeting materials and posting relevant documents to the CoC website. Website management.
	CoC System Development – Advocacy	Identifies, supports, and advocates for programmatic and systemic changes to improve services and outcomes for homeless and at-risk populations.
	CoC System Planning Trends and Funding	Identifies and communicates current and emerging needs and funding opportunities related to affordable housing and homelessness.
	Annual Review Processes – CES, Governance Charter, Written Standards	Facilitates and reports progress on required annual review processes related to the CES, Charter, and updates to Written Standards.
	Facilitate Community Education	Facilitates community outreach and education by: <ul style="list-style-type: none"> Assisting in the development of materials and meeting logistics. Documenting results.
	CoC Application – Technical Assistance to Applicants	Provide technical assistance and training to CoC Project Applicants to ensure eligibility of project applications.
	CoC Application – Technical Assistance to CoC	Provide technical assistance and advice to the CoC Board to enhance the competitiveness of the CoC Application.

Chapter Appendix A

Program Level Eligibility and Duties of the Administrative Entity

State Program	Eligible Applicants	Administrative Entity Eligibility Requirements	Functions to be Included in 2023-24 MOU
Home Energy Assistance Program (HEAP) CoC Allocation only	<ul style="list-style-type: none"> A unit of general purpose local government; or A non-profit entity 	Has: <ul style="list-style-type: none"> Previously administered federal HUD Continuum of Care (CoC) funds as the <u>Collaborative Applicant</u>, pursuant to 24 CFR 578.3. Been designated by the CoC to administer program funds (HEAP NOFO) 	None, program expired
California Emergency Solutions and Housing Program (CESH) CoC Allocation only	<ul style="list-style-type: none"> A unit of general purpose local government; A nonprofit organization that has previously administered HUD CoC funds as the collaborative application, per 24 CFR 578.3; or A unified funding agency as defined in 24 CFR 578.3. Provide documentation in the application that the applicant is designated by the CoC to administer CESH Program funds. 	Is an eligible applicant.	Track and report on CESH Round 1 and 2 funds approved on May 10, 2023.
Homeless Housing, Assistance and Prevention (HHAP) CoC Allocation only	<ul style="list-style-type: none"> Entities identified in the funding notice (qualified units of government, CoCs, and subrecipients/affiliates in application). 	<ul style="list-style-type: none"> Is a part of the Regional Plan established in the application; Must sign coordinated Regional Plan (Round 5). Must complete community process with stakeholders as identified in the NOFA. 	Pending – Community process; See list on pgs. 3-4; Housing & Safety Code reporting & tracking requirements.
State Housing and Community	An Administrative Entity that:	<ul style="list-style-type: none"> Has received funding from HUD in at least one of the 	AE is approved by State for 2 years.

Development (HCD) Emergency Solutions Grant (ESG) CoC Award only	<ul style="list-style-type: none"> • Is a unit of general purpose local government and has administered ESG funds as a HUD entitlement during at least one of the previous five years; • Has no unresolved ESG monitoring findings with HUD or the Department that the Department determines poses a substantial risk to the Department; • Can demonstrate the ability and willingness to perform the functions of an Administrative Entity (see " Administrative Entity and CoC Responsibilities" below and 25 CCR Section 8403 of the State Regulations); • Be recommended by the CoC and willing to collaborate to the maximum extent feasible with its CoC. • Follow Department requirements of 25 CCR 8403(k). For any change in AE. 	<p>past two years or has registered to apply for funding in the next competition;</p> <ul style="list-style-type: none"> • Has HUD-compliant conflict of interest policies in place; • Has adopted written standards for the proposed activity; and • Operates a HUD-compliant Homeless Management Information System (HMIS) 	<p>Compliance: for requirement 5. is Fed reg are 24 CFR 576 State See HCD list p. 2,5</p> <p>Tracking and reporting FY 2023-24 funding.</p>
HUD CoC Collaborative Applicant	<ul style="list-style-type: none"> • A unit of government or governmental instrumentality • A private non-profit that is eligible for funding, or • A legal entity may not be for profit. 	<p>CoC must be registered with HUD, designates the Collaborative Applicant per Governance Charter.</p> <p>Change in CA requires communication with HUD and designation during annual cycle.</p>	<p>Per 24 CFR 578 and Governance Charter.</p> <p>Annual NOFO application and reports. See pg. 9 for list</p> <p>Planning Grant submittal, activities, and implementation.</p>

Chapter Appendix B
**Crosswalk: HUD Collaborative Applicant and
 State Administrative Entity**
Roles and Responsibilities (*funding source requirements*)

Collaborative Applicant Roles and Responsibilities	Administrative Entity Roles and Responsibilities (for CoC Allocated Funds only)
Recordkeeping requirements:	Grants:
<ul style="list-style-type: none"> Evidence that the Board selected by the Continuum of Care meets the requirements of 24 CFR §578.5(b) 	<ul style="list-style-type: none"> Ensure the Administrative Entity that is selected by the CoC for the is registered and approved by the State.
<ul style="list-style-type: none"> Evidence that the CoC has been established and operated as set forth in Subpart B, including: <ul style="list-style-type: none"> Published agendas and meeting minutes; An approved Governance Charter that is reviewed and updated annually; A written process for selecting a board that is reviewed and updated at least once every five (5) years; Designating a single HMIS for the CoC; and Monitoring reports of recipients and subrecipients. 	<ul style="list-style-type: none"> Ensure completion of local planning processes as required by the specific state funding source. For example: HHAP 5 community meetings and recipient plan(s). Complete and submit State grant applications for CoC portion of state-funded homeless programs.
<ul style="list-style-type: none"> Evidence that the CoC has prepared the application for funds as set forth in 24 CFR §578.9, including the designation of the eligible applicant to be the Collaborative Applicant. 	<ul style="list-style-type: none"> Verify all components of the electronic application are completed as directed in funding source announcement.
Administration:	Administration:
<ul style="list-style-type: none"> Provide staff for CoC General Membership and CoC Board meetings for sending announcements, recording meeting attendance, and taking and maintaining meeting minutes. 	<ul style="list-style-type: none"> Enter into contract with the State Agency to receive CoC portions of State homeless programs such as HHAP and ESG funds
<ul style="list-style-type: none"> Inform the CoC of HUD notices, interim rules, and changes to regulations. 	<ul style="list-style-type: none"> Responsible for tracking of funds and meeting the terms and conditions of the State contract(s).
<ul style="list-style-type: none"> Coordinate the monitoring of performance and evaluation, and report findings to program recipients, the Board and membership. 	<ul style="list-style-type: none"> Contracting (when necessary) with sub-recipients and reporting on funds and activities to Cal ICH.
HUD Annual Requirements:	State Requirements:
CoC Program Registration	Ensure AE has been approved by the State (AE authorization by State for ESG is valid for 2 years).
Housing Inventory Count (HIC)	Update housing and services profiles in reports.
Point-in-Time Count (PITC)	Report PITS HMIS Data to HMIS.
Grant Inventory Worksheets (GIW)	Providing HMIS data to the State HDIS.
Local Application Process	
System Performance Measures (SPMs) PIT/HIC Data Entry	Extract SPM for state-supported programs.
Facilitate the CoC Program Competition	

Notice of Funding Opportunity (NOFO)	Track and respond to State announcements of funds available during the FY.
Consolidated Plan	Ensure priorities/projects being submitted to state align with the Consolidated Plan and CoC strategies for the CoC portion of state funds.
Longitudinal Systems Analysis (LSA)	Submitting required reports.
Grant Awards	Design and contract for use of planning and administrative funds; ensure local allocations meet minimum requirements as established by state – example youth program funding.
Consultation Requirements: (per 24 CFR 578)	Consultation Requirements:
Consult with CoC, HMIS, and ESG recipients – (per 24 CFR 578) to establish, set standards for operation of Coordinated Entry System	Ensures CoC meets State funding activities for consultation, coordination, and planning to meet State funding requirements.
Consult on Governance Charter policies and procedures, including code of conduct and recusal process.	No equivalent requirement.
Other Support Activities as negotiated and specified in the MOU.	Other Support Activities as negotiated and required by the State funding program.

Chapter Appendix C State Program Narrative

Please use the link below to access the file describing the State funding programs for addressing homelessness.

[..\Administrative Entity\AE and CA Definitions and details 10.6.23.docx](#)

Chapter 5

Homeless Management Information System Lead Agency

Contents

Introduction	2
References	2
Overview and HUD Requirements	2
HMIS and Victim Service Providers	2
Term	3
Performance Standards/Memorandum of Understanding	3
Roles and Responsibilities	4
Roles and Responsibilities of the HMIS Lead Agency	4
Locally Defined Roles and Responsibilities	5

Introduction

One of the responsibilities of the Continuum of Care (CoC) is to implement a Homeless Management of Information System (HMIS) as prescribed by the U.S. Department of Housing and Urban Development (HUD). This chapter addresses the plan for implementation and management of the HMIS.

References

The following references are applicable to the information in this chapter:

- 24 CFR 578.7(a)(3)
- Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program, 77 Fed. Reg. 45422, July 31, 2012 (24 CFR §578) (referred to as the CoC Program Interim Rule).
- HUD HMIS Data and Technical Standards, 2024.

Overview and HUD Requirements

The HMIS Lead Agency plays a vital role as the data repository, tracking, and report generating entity for the CoC. Together with the CoC Membership, CoC Board, Collaborative Applicant, and Coordinated Entry System (CES) Lead Entity, the HMIS Lead Agency works to ensure that the system serves people who are homeless or at imminent risk of homelessness by providing them with support to quickly establish and retain permanent housing.

Per HUD requirements, the CoC must designate a legal entity and CoC Program-eligible applicant to serve as the HMIS Lead Agency that will:

- Maintain the community's HMIS in compliance with HUD standards related to data standards, privacy, security, and reporting requirements, and
- Coordinate all related activities including training, maintenance, and the provision of technical assistance to contributing organizations.

The HMIS Lead Agency is responsible for the administration and daily operation of the system. HUD expects the HMIS Lead Agency to also include data from all homeless-dedicated housing and shelter resources within the CoC boundaries, whether or not they receive HUD funds.

HMIS and Victim Service Providers

There can only be one HMIS system for the CoC, with an exception for Victim Service Providers (VSP) who gather data in a secured data system comparable to an HMIS. All CoC and Emergency Solutions Grant (ESG) grant recipients must contribute client-level data to the HMIS to meet the HUD reporting requirements.

Term

The designation of HMIS Lead Agency is valid for a maximum of three (3) years before it must be reviewed and approved by a vote of the CoC Board. There will be no requirement for a Request for Proposal (RFP). In response to negligence or poor performance of the HMIS Lead Agency, the CoC Board reserves the right to open an RFP process at any time to identify and designate a new HMIS Lead Agency.

Performance Standards/Memorandum of Understanding

The responsibilities of the HMIS Lead Agency are documented in the *Memorandum of Understanding between San Bernardino County, Office of Homeless Services and CA-609 San Bernardino City and County Continuum of Care, Homeless Management of Information System*, as approved by both parties.

The HMIS Lead Agency is responsible for approaching all efforts with impartiality and a sense of urgency that results in timely and effective implementation of the HMIS.

The senior position member (i.e., Director or Chief) of the HMIS Lead Agency is responsible for the direct management of HMIS staff and execution of the MOU. The CoC Board Chair and Vice Chair have the responsibility to define, update, and sign the MOU on behalf of the CoC. The MOU should contain all areas noted in this charter as under the purview of the HMIS Lead Agency.

The CoC Board will review the performance of the HMIS Lead Agency every year. The review will be based on the roles and responsibilities included in the MOU and the extent to which the HMIS Lead Agency executes the duties. The designation may be terminated at the sunset of the MOU, upon mutual agreement, or for cause with a vote of two-thirds the CoC voting membership.

At the time of creation and adoption of this charter, the SB CoC has designated the County of San Bernardino Office of Homeless Services as the HMIS Lead Agency.

Roles and Responsibilities

Roles and responsibilities of the HMIS Lead Agency include the following:

- **Regulatory Roles and Responsibilities:** Identified through federal and state regulation.
- **Locally Defined Roles and Responsibilities:** Delegated by the Membership.

There are three basic levels of responsibility:

- **Authority/Oversight:** Provides authority or oversight of a specific activity. Authority indicates the group with a formal vote as the responsible/approving body. Oversight indicates that reports and information will be provided to this body by another component.
- **Lead:** Charged with leading the action to implement the responsibility in accordance with the HUD regulations, CoC policies, and procedures. The Lead works closely with the CoC Board and the support structures to realize the vision for CoC system of care. The Lead works collaboratively within the structure to coordinate and operationalize the area of responsibility.
- **Support:** Is consulted and/or an active participant in carrying out a HUD regulation in collaboration with other structures and systems. These entities join the Lead in taking the action by providing expertise, information, and/or commitment to implementation.

Roles and Responsibilities of the HMIS Lead Agency

The following table identifies **Regulatory Roles and Responsibilities** of the HMIS Lead Agency as per Title 24 of the Code of Federal Regulations (CFR) and HUD HMIS Data Standards, and is organized by Level of Responsibility:

Level of Responsibility	Activity	Implementation/Operation
Authority/ Oversight	HMIS Vendor Relations <i>HUD HMIS Data Standards</i>	<ul style="list-style-type: none">• Has signing authority for the HMIS (including software and hardware vendors).• Responsible for direct communications with HMIS vendor to ensure system performance.
	HMIS Funding <i>HUD HMIS Data Standards</i>	<ul style="list-style-type: none">• Prepares applications for HMIS designated funding.• Manages funding in compliance with funding source requirements.
Lead (with the Collaborative Applicant and CoC Board)	Consult with the Collaborative Applicant to develop, follow, and annually update a Governance Charter that includes all HUD-required components <i>§578.5(a)(5)</i>	Consults with the Collaborative Applicant and CoC Board on the Governance Charter.
Lead	Consult with the Collaborative Applicant and recipients of ESG program funds to establish and operate a Coordinated Entry System (CES) in accordance with HUD standards <i>§578.5(a)(8)</i>	Consult with the Collaborative Applicant and recipients of ESG program funds in establishing the CES and standards.
	Designate a single HMIS for the CoC geographic area <i>§578.5(b)(1)</i>	Leads the review and selection of the HMIS software and vendor.

	Ensure consistent participation in HMIS by the CoC and ESG recipients and subrecipients (federal) and State-funded CoC project recipients and subrecipients (State) §578.5(b)(4)	Ensures participation in HMIS and coordinates with Victim Service Providers regarding comparable databases.
	Ensure HMIS is administered in compliance with HUD standards and policies §578.5(b)(5)	<ul style="list-style-type: none"> Ensures HMIS policies and procedures are updated to retain compliance with HUD data standards and HMIS requirements. Works with the HMIS vendor and participating agencies to retain compliance with HUD data standards. Enforces security and privacy standards. Manages annual reports to HUD. Oversees HMIS daily operations.
Support	Plan and conduct a Point-In-Time Count (PITC) throughout the CoC geographic area at least biennially §578.5(c)(2) ¹³	Provides required data from the HMIS for the sheltered and unsheltered PITC.
	Conduct an annual gaps analysis of needs and services in the CoC geographic area §578.5(c)(3)	Assists the Board and subcommittee(s) in implementing gaps analysis in collaboration with Membership.
	Apply for CoC and Planning Grant Funds §578.9	Ensures HMIS Lead Agency adheres to CoC Policy.

Locally Defined Roles and Responsibilities

The following table identifies **Locally Defined Roles and Responsibilities** of the HMIS Lead Agency:

Level of Responsibility	Activity	Implementation/Operation
Authority/ Oversight	HMIS Data Standards and Contracting	Manages all related written agreements, including agency, end user, and data sharing agreements.
	HMIS Privacy and Security Training	Provides agency and end-user training to ensure system integrity and data quality.
	HMIS Outreach and Engagement	Manages HMIS outreach and engagement, training, and technical assistance to direct service providers within the CoC.
	HMIS System Communication and updates	Keeps abreast of and informs the CoC Membership and Board on the HMIS, Annual Homeless Assessment Report, PITC and other data related regulation changes by HUD and the State of California.
	Project Level Data Services	<ul style="list-style-type: none"> Offers HMIS expertise and recommendations regarding project performance evaluations and improvements. Collects and reports CoC and program performance data and use data gathered to quantify homelessness, communicate

¹³ Current practice is to conduct sheltered and unsheltered counts annually. The HMIS Lead Agency has not been identified by the Ad Hoc Committee as providing support for the PITC, however, HUD regulations require HMIS participation.

		progress, and encourage performance improvement.
Lead	Ensures HMIS system is capable of implementing and supporting CES functions	<ul style="list-style-type: none"> • Incorporates the CES module in the HMIS system.¹⁴ • Advises subcommittee on CES module design.
	Integration and implementation of CES Module	Responsible for working with the HMIS software vendor to ensure successful integration and ongoing implementation of the CES module in the HMIS system.
	HMIS Annual Reports	Ensures data entry, reconciliation, and report generation for the PITC, Housing Inventory Count (HIC), and Longitudinal Systems Analysis (LSA) data in the HUD Data Exchange.
	State Funding Reporting	Ensures HMIS data is transmitted to State Homeless Data Integration System as required.
	State Performance Data	Provides data and reports, acting as the Administrative Entity for state-allocated CoC funds.
	CoC and State HMIS Privacy and Security	Maintains and adheres to HMIS Policies and Procedures, Privacy Plan, Security Plan, and Data Quality Plan.
Support	System Improvement and Planning	<ul style="list-style-type: none"> • Partners with CoC committees to provide and interpret data needed for CoC and ESG Program, and system performance evaluation and improvement. • Identifies and communicates current and emerging trends based on homeless data collected within the CoC.
	System Effectiveness and Evaluation	Engages in conversations related to outcome and performance data on the successes and challenges of people who are experiencing or have experienced homelessness.
	System Improvement	<ul style="list-style-type: none"> • Offers HMIS expertise and recommendations regarding system level process and performance. • Makes recommendations to Board.

¹⁴ In 2022, the SB CoC Board voted to expand HMIS by incorporating a CES Module.

Chapter 6

Coordinated Entry System Lead Entity

Contents

Introduction	2
References	2
Coordinated Entry System Lead Entity.....	2
Term	2
Performance Standards/Memorandum of Understanding	2
Role and Responsibilities	3
Roles and Responsibilities of the CES Lead Entity	4
Locally Defined Roles and Responsibilities	4

Introduction

The Continuum of Care (CoC) is required to consult with Emergency Solutions Grant (ESG) recipients and to establish and operate a Centralized or Coordinated Entry System (CES) to assess, prioritize, and offer housing and services to individuals and families. A designated CES Lead Entity is responsible for daily implementation of the CES.

This chapter addresses the roles and responsibilities of the CES Lead Entity for the CoC.

References

The following references are applicable to the information in this chapter:

- 24 CFR §578 (referred to as the CoC Program Interim Rule)
- Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program, 77 Fed. Reg. 45422, July 31, 2012.
- CES Regulatory Guidance, Community Planning and Development (CPD) Notice 17-01.
- SB CoC CES Review Findings and Recommendations adopted by the CoC Board in September of 2022 and updated SB CoC CES Policies Guide, March 2023.

Coordinated Entry System Lead Entity

The CES Lead:

- Operates the CES as described in the CES Review Findings and Recommendations, September 2022, and the CES Policies Guide, March 2023.
- Is expected to coordinate program participants' initial screening and assessment and provide referrals to homeless services.

Each CoC is required to designate an entity to serve as the CES Lead. The designated CES Lead is tasked with fulfilling the responsibilities defined below and in the Memorandum of Understanding (MOU) between the CoC Board, on behalf of the CoC membership, and the CES Lead. The CES Lead should approach all efforts with impartiality and a sense of urgency in connecting people with housing and services.

Term

The designation of CES Lead by a vote of the CoC Board is valid for a maximum of three (3) years before it must be reviewed and re-approved or changed. There will be no requirement for a Request for Proposal (RFP). A MOU between the CoC and the CES Lead will identify the applicable term dates. In response to negligence or poor performance of the CES Lead, the CoC Board reserves the right to open an RFP process at any time to identify and designate a new CES Lead.

Performance Standards/Memorandum of Understanding

The responsibilities of the CES Lead entity are documented in the *Continuum of Care CES Lead Memorandum of Understanding*. The *CES Review and recommendations*

*Report*¹⁵ and the subsequent *CES Guide*¹⁶ detail the design, standards, and operations for CES as a system.

The Chief Executive of the CES Lead Entity, supported by the CES Coordinator as designed by the CES Lead Entity, is responsible for the direct management of staff and execution of the MOU. The CoC Board, in consultation with the HMIS Lead agency, has the responsibility of defining, updating, and approving the MOU. The MOU should contain all areas noted in this chapter as under the purview of the CES Lead entity. The CoC Collaborative Applicant will sign the MOU on behalf of the CoC.

The CoC will review the performance of the CES Lead every year and publish a summary report of the outcome. The review will be based on the roles and responsibilities as indicated in the MOU and the extent to which the CES Lead successfully executes the corresponding duties. The performance review will also take into account the input from the HMIS Lead Agency.

The designation of a CES Lead may be terminated at the sunset of the MOU, upon mutual agreement between the CES Lead Entity and the CoC Board, or for cause with a vote of at least two-thirds (2/3) of the CoC membership voting for termination.

At the time of creation and adoption of this charter, the San Bernardino City and County Continuum of Care (SB CoC) has designated Inland So Cal United Way - 211 as the CES Lead entity. The Executive Director of So Cal Inland United Way - 211 has been designated as the Authorized Administrator for the CES Lead. The Chief of the Office of Homeless Services is the authorized signor for the CoC Collaborative Applicant with respect to the CES.

Role and Responsibilities

Roles and responsibilities of the CES Lead Entity include the following:

- **Regulatory Roles and Responsibilities:** Identified through federal and state regulation.
- **Locally Defined Roles and Responsibilities:** Delegated by the Membership.

There are three basic levels of responsibility:

- **Authority/Oversight:** Provides authority or oversight of a specific activity. Authority indicates the group with a formal vote as the responsible/approving body. Oversight indicates that reports and information will be provided to this body by another component.
- **Lead:** Charged with leading the action to implement the responsibility in accordance with the HUD regulations, CoC policies, and procedures. The Lead works closely with support structures to realize the vision for CoC system of care. The Lead works collaboratively within the structure to coordinate and operationalize the area of responsibility.

¹⁵ The CES Review, Findings, and Recommendations Report, Adopted by the Board in September 2022.

¹⁶ Presented and accepted in March 2023.

- **Support:** Is consulted and/or an active participant in carrying out a HUD regulation in collaboration with other structures and systems. These entities join the Lead in taking the action by providing expertise, information, and/or commitment to implementation.

Roles and Responsibilities of the CES Lead Entity

The following table identifies **Regulatory Roles and Responsibilities** of the CES Lead Agency as per Title 24 of the Code of Federal Regulations (CFR), and is organized by Level of Responsibility:

Level of Responsibility	Activity	Implementation/Operation
Lead	Consults with the Collaborative Applicant, HMIS Lead Agency, and recipients of ESG program funds to establish and operate a CES in accordance with HUD standards §578.5(a)(8)	<ul style="list-style-type: none"> • Designs and implements a CES: <ul style="list-style-type: none"> – To coordinate housing and services. – As described in the CES Review and Recommendations Report and the CES Policy Guide. • Establish an MOU with the Collaborative Applicant regarding the operation of the CES. • Submits regular reports to the CoC Board.
Support	Annual Review of CES	Provide data and other information to the CoC Board and Collaborative Applicant to successfully complete the annual review of the CES , performance, and outcomes.

Locally Defined Roles and Responsibilities

The following table identifies **Locally Defined Roles and Responsibilities** of the CES Lead Entity:

Level of Responsibility	Activity	Implementation/Operation
Authority/ Oversight	Regional Access Points	Solicit and contract with eligible entities to operate access points in each subregion as described in the CES Policy guide.
Authority/ Oversight	Signing Authority	Sign, on behalf of the CES, as described in MOU or as directed by CoC Board.
Authority/ Oversight	Expertise and Recommendations	Offer CES expertise, recommendations, and best practices to the Board.
Lead	Technical Assistance and Training	Offer technical assistance and training to the Board and CES providers.
Lead	Funding	<ul style="list-style-type: none"> • Monitor opportunities for CES funding. • Prepare applications for Board approval.
Lead	Regulatory Changes	<ul style="list-style-type: none"> • Maintain awareness of CES and outreach regulatory changes.

		<ul style="list-style-type: none"> • Inform the CoC and Board of changes as appropriate. • Ensure the CES is implemented in compliance with HUD regulatory changes.
Support	CES Platform in HMIS	Coordinate with the HMIS Lead Agency in implementation of the CES Module in HMIS.

Chapter 7

Emergency Solutions Grant

Contents

Introduction	2
Purpose	2
Term	2
Roles and Responsibilities	3
Roles and Responsibilities of Emergency Solutions Grant Recipients.....	3
Locally Defined Roles and Responsibilities	4

Introduction

Federal regulations (24 CFR 578) require the Continuum of Care (CoC) program to consult, plan, coordinate, and evaluate with Emergency Solutions Grant (ESG) recipients in the geographic area of the CoC. The intent of these efforts is to promote communitywide commitment to the goal of ending homelessness, and to promote access to and effective utilization of resources to assist homeless individuals and families achieve stable housing and optimal self-sufficiency. U.S. Department of Housing and Urban Development (HUD) regulations for the ESG entitlement (24 CFR 576) also incorporate consultation and coordination with the CoC.

This chapter addresses the roles and responsibilities for CoC coordination with the ESG program.

Purpose

The ESG Program provides funding to eligible jurisdictions to:

- Engage persons living in homelessness,
- Ensure quality operations of emergency shelters,
- Provide essentials services to shelter residents,
- Offer rapid rehousing opportunities to households and outreach to people living in homelessness, and
- Assist in the prevention of homelessness.

The CoC program does not fund emergency shelters or prevention. Consultation between the CoC and ESG programs is necessary to design a system of care to achieve HUD's primary goals by intentionally planning and leveraging resources available to the community to form a comprehensive system of shelter, housing, and services.

Term

Designation of ESG eligible areas is determined by HUD and the State, and are publicly announced annually. These areas are referred to as ESG Entitlement Areas or ESG Recipients. Projects and subrecipients are determined through the application and request for funding processes established by the ESG recipients who are public entities.

At the time of adoption of this Charter, San Bernardino County and the CoC each receive an allocation of state-level ESG funds. The CoC must utilize an Administrative Entity to contract for and manage State ESG funds. See *Chapter 4 – HUD Collaborative Applicant and State Administrative Entity* for additional information.

Roles and Responsibilities

Roles and responsibilities of the CoC Board include the following:

- **Regulatory Roles and Responsibilities:** Identified through federal and state regulation.
- **Locally Defined Roles and Responsibilities:** Delegated by the Membership.

There are three basic levels of responsibility:

- **Authority/Oversight:** Provides authority or oversight of a specific activity. Authority indicates the group with a formal vote as the responsible/approving body. Oversight indicates that reports and information will be provided to this body by another component.
- **Lead:** Charged with leading the action to implement the responsibility in accordance with the HUD regulations, CoC policies, and procedures. The Lead works closely with support structures to realize the vision for CoC system of care. The Lead works collaboratively within the structure to coordinate and operationalize the area of responsibility.
- **Support:** Is consulted and/or an active participant in carrying out a HUD regulation in collaboration with other structures and systems. These entities join the Lead in taking the action by providing expertise, information, and/or commitment to implementation.

Roles and Responsibilities of Emergency Solutions Grant Recipients

The following table identifies **Regulatory Roles and Responsibilities** of the Emergency Solutions Grant Recipients as per Title 24 of the Code of Federal Regulations (CFR), and is organized by Level of Responsibility:

Level of Responsibility	Activity	Implementation/Operation
Lead	Evaluation of ESG subrecipients in CoC	<ul style="list-style-type: none">• Evaluate ESG subrecipients for compliance with regulations and written standards.• Share results related to CoC program recipients on request.
Support	<ul style="list-style-type: none">• Evaluate outcomes of projects funded by CoC and ESG, as well as State-funded CoC homelessness projects• Make reports to the funding source as necessary §578.5(a)(7)	<ul style="list-style-type: none">• CoC and ESG representatives participate in the evaluation of ESG-funded projects.• Provide reports to CoC Board, or designee.
Support	Consult with Collaborative Applicant, HMIS Lead, and ESG areas to establish and operate a CES consistent with 24 CFR 578. Ensure consistent participation in HMIS by CoC and ESG recipients and subrecipients and state funded CoC projects in the Coordinated	<ul style="list-style-type: none">• Consult with Collaborative Applicant, HMIS Lead, and CES Lead on CES system design, assessment criteria and operating standards.• Ensure ESG recipient participation in CES.

	Entry System (CES) in accordance with HUD standards.	
Support	Consult with recipients of ESG program funds (entitlements) to establish and consistently follow Written Standards for providing assistance.	Consult with the CoC Board and subcommittee in establishing eligibility, policies, and priorities for assistance in CoC Written Standards.
Support	Ensure consistent participation in HMIS by CoC, ESG, and state-funded CoC project recipients and subrecipients. §578.5 (b)(4)	Support the HMIS Lead Agency and Collaborative Applicant in ensuring ESG project participation in HMIS.
Support	Consult with State and local government ESG program recipients to plan the allocation of ESG funds. §578.8 (c)	Consult with the Collaborative Applicant and CoC Board regarding the use of ESG funding.
Support	Evaluate performance of ESG subrecipients in CoC §578.8 (c)(5)	ESG staff evaluate ESG subrecipients for compliance with regulations and Written Standards. Share results related to CoC program recipients on request.

Locally Defined Roles and Responsibilities

The following table identifies **Locally Defined Roles and Responsibilities** for ESG recipients:

Level of Responsibility	Activity	• Implementation/Operation
Support	Annual Processes – Housing Inventory Chart (HIC) and Point-in-Time (PIT) count	<ul style="list-style-type: none"> • Encourage participation in the sheltered and unsheltered PIT count. • Provide all data needed for completion of the HIC to the Collaborative Applicant and HMIS Lead Agency for inclusion in the timely submittal of the HIC to HUD.
Support	Educate and advise the CoC on eligible uses of ESG funds	Encourage participation of public entities/ units of government to help educate and advise the CoC on eligible uses of ESG program funds.

Chapter 8 Committees

Contents

Introduction	2
Purpose	2
Roles and Responsibilities	2
Committee Designations	3
Committee List and Purpose	4
Other Discretionary Committees	4
Special Ad Hoc Committees	4
Committee Officers	4
Committee Meeting Protocols	5
Geographic Coverage and Community Input	7
Regional Steering Committees	8
Appendix to Chapter 8	11

Introduction

This chapter addresses the roles, responsibilities, protocols, and practices related to the establishment and operation of committees in the Continuum of Care (CoC) structure. Committees can include Standing Committees, Ad Hoc Committees, Subcommittee (Task and Work Groups), and regional or other networks that have been recognized by the CoC. Ad Hoc groups and subcommittees may be convened by either the CoC Membership, or the CoC Board. Only the CoC Board can establish decision-making Standing Committees. Like the CoC Board, Standing Committees are subject to the Brown Act.

Purpose

The purpose of Committees is to provide support and advice on the development of policies and procedures to effectively implement the CoC. These policies must align with the adopted Governance Charter. Although broad community input is welcomed by the CoC, official advisory bodies are established through standard procedures.

Committee development is designed to achieve the following goals:

- Increase participation by the CoC Membership, Board, and designees in the policy development process;
- Undertake specific tasks as requested by the CoC membership or Board;
- Develop proposals and recommendations Board for consideration;
- Interact with Collaborative Applicant staff assistance;
- Interact with staff, Council members, and members of the County Board of Supervisors, so that the concerns of local governments are fully understood in the formulation of regional policies; and
- Actively seek the involvement of other regional agencies, and business and citizen groups so that their perspectives can be incorporated in CoC policies and decisions.

Roles and Responsibilities

Official Committees have the power, duty, and responsibility to:

- Compile, document, and archive, in a form accessible to the CoC Membership and public, any documents related to the Committee and/or Board including all actions taken to amend said documents.
- On its own initiative or in response to a request by a committee, committee members, members of the CoC or the Board, review CoC-related governing documents and recommend amendments to such documents.
- Conduct periodic reviews and recommend amendments to policies, written standards, and procedures to enhance the effectiveness of the CoC.
- Assist in the development and documentation of the structure and functioning of all committees.
- Develop internal standards for committees so long as they do not supersede or supplant existing CoC rules and/or regulations.
- Create sub-committees or task groups as needed to complete its work.
- Adopt special rules, consistent with the Rules, Policies and Procedures of the CoC, as it deems advisable to govern the conduct of internal Committee business.
- Perform other duties as requested by the CoC Membership or Board and provide copies of correspondence through the CoC Secretary.

Committee Designations

Committees, comprised of CoC members in good standing who are selected and invited to participate, are established to perform specific functions for the CoC or Board. These committees may be structured to provide specific services, research, and/or recommendations to further the work of these groups. All Committee meetings will be conducted in accordance with the CoC's Code of Conduct and Principles of Decorum.

Committees will be designated as either Decision-Making or Advisory:

- **Decision-Making Committees** A decision-making committee is empowered to make certain types of decisions without returning to the CoC Membership or Authorizing group. These committees are required to follow Brown Act¹⁷ for public notice, public comment, and member restrictions. Decision-Making Committees are Standing Committees that meet on regular dates and times as approved by the CoC. Meeting agendas will be posted on the San Bernardino County Homeless Partnership website in advance of the meeting and a reference copy will be available at the meeting location. Agendas will have a designated time on the agenda for public comment. If a Decision-Making Committee wishes to solicit additional input, it may schedule a specific time and notify all stakeholders of that opportunity. If a committee wishes to request a meeting that is not regularly scheduled, the committee Chair must consult with Collaborative Applicant staff on the availability of meeting space and support staff needed for the meeting. Meeting notices will be distributed through the CoC Secretary.

Committee Member attendance will be recognized distinctly from the public using a roll call, either through physical location for in-person meetings, or by name recognition in virtual meetings. A meeting summary should be kept to the extent necessary to record important discussions and decisions made and provided to the CoC Secretary. All motions must be recorded, including the persons making and seconding the motion and the outcome of the vote.

Some, but not all, Standing Committees may be given decision-making power. The Standing Committees list identifies these authorities.

- **Advisory (Ad Hoc) Committees.** These temporary committees will not be subject to Brown Act protocols. However, agendas should still be established and published to assist in meeting facilitation **and transparency**. An Advisory Committee is established to help inform decisions made by the CoC Board or CoC Membership. These groups provide vital expertise and information through discussion on topics, areas of interest, or specific tasks related to the CoC and community. Committee meetings, except those pertaining to the selection or funding of projects, or those related to legal action, are open to the public as spectators. Ad hoc committees are comprised of members of the legislative body. The Chair or Facilitator of an Ad Hoc Committee can invite others from the community in order to strengthen achievement of the committee objectives.

¹⁷ Ralph M. Brown Act, CA.

Committee List and Purpose

Specific committees may be designated as ongoing Standing committees, while other committees, discretionary or ad hoc, may be established as necessary for a period of time to accomplish special functions that achieve the responsibilities of the CoC or efficient operation of the CoC Membership or Board.

In addition to the responsibilities indicated for each subgroup below, responsibilities may be added or removed, as approved by the CoC Board.

A Standing Committee is one that is recognized as essential to the function of the CoC and is maintained on an ongoing basis unless dissolved through CoC Membership or Board action. Specific duties and responsibilities of each standing committee are outlined in subsequent sections of this Chapter. Standing Committees have a responsibility to increase the knowledge or capacity of the CoC related to their area of interest/domain. The Standing Committee Chair can form Ad Hoc, task-oriented subgroups that are advisory-only. These temporary, task-oriented subgroups are not decision-making, meet at times as determined by the group, offer input to the Committee Chair, and are not subject to the Brown Act.

Other Discretionary Committees

Other Discretionary Committees are appointed by the CoC Membership and Board as necessary to fulfill distinct needs of the CoC. The Membership and Board Chair have the discretion to activate these committees. The Chair, with the approval of the governing board, may identify additional Discretionary Committees as the needs of the CoC warrant. Such committees have the same general responsibilities to the Board and the membership of the CoC as Standing Committees. Specific duties and responsibilities of Discretionary Committees will mirror general responsibilities of established Standing Committees.

Special Ad Hoc Committees

The CoC, the Board Chair and Vice Chair, may establish Ad Hoc Committees to address special, short-term projects. In contrast to other discretionary committees, the primary purpose of these committees is temporary, rendering it unlikely that these committees will continue beyond one year or as needed per year.

Committee Officers

Each Standing Committee will elect at least two committee officers: one to serve as Chair of that committee; and one to serve as Secretary. Officers are elected for a term of two years. Although not mandatory, Standing Committees will typically include at least five (5) CoC Voting Members. The protocols for selection of the officers for each position include the following:

- The nominee for a position receiving a majority of votes cast and who accepts the nomination will be declared as elected to fill the position.
- If no nominee receives a majority vote on any vote, then the lowest vote receiver and anyone not receiving a vote will be dropped from the next ballot until a nominee receives a majority.
- Each committee will designate a liaison who assists with communication to the full

CoC as needed. Liaisons support their committee by communicating committee recommendations to the Membership. The liaison functions could be assigned to a member of the committee who is also a Board Member or Committee Officer.

- The Committee Members, like all CoC Members, will abide by the Code of Conduct, including the Conflict-of-Interest policy.
- No two Committee Officers members may come from the same agency or affiliated agency.

Committee Meeting Protocols

Location

Standing Committee meetings will be held at a location accessible to the public and accommodating to special needs. Virtual participation will be allowed in accordance with the committee protocol and Brown Act requirements. Committee Members can participate virtually from multiple locations within the CoC geography as long as the Brown Act notices and rules for participation are followed:

- the location is accessible to the public,
- notice of the meeting and agenda are provided in advance and are available at the location,
- members of the public can attend from any published location,
- there is opportunity for public input, and
- votes are taken by roll call.

Dates and Times of Committee Meetings

Meetings of all standing committees will be held regularly. The date and time of committee meetings will be determined by the Committee Chair, in consultation with the other Committee member(s) and the appointed Secretary.

Distribution of Meeting Notices

- Decision-Making Committees:
 - Regular Meetings: No later than 3 days before each regular **S**tanding Committee meeting, notice of a scheduled committee meeting shall be delivered, mailed, or transmitted electronically to the Board Secretary so as to meet the Brown Act requirements (Government Code sections 54950-54963).
 - Special Committee Meetings: As soon as practical but not less than 24 hours prior to a Special Committee Meeting, notice of a Special Committee Meeting will be delivered, mailed, or transmitted electronically to the Secretary for release so as to meet the Brown Act requirements (Government Code sections 54950-54963).
 -
- Advisory Committees and Ad Hoc Groups will set their own meeting schedule and agendas. The Brown Act is not imposed when " *the attendance of a majority of the members of a legislative body at an open and noticed meeting of a standing committee of that body, provided that the members of the legislative body who are not members of the standing committee attend only as observers.* "

Agendas

The Chair of a Committee will be responsible for overseeing the preparation of the agenda for committee meetings, in consultation with the CoC Secretary. The agenda items for a committee meeting will remain within the subject matter of the committee as

determined by the Charter or document approving an action. The committee Chair shall determine the order of agenda items and shall make time allocations for the agenda items.

Agenda Order

The agenda for any committee operating under the Brown Act will include verification of attendance, an opportunity for Public Comment, and approval of the minutes from the prior meeting. Although not a mandate, a typical Brown Act meeting sequence is:

1. Call to Order
2. Roll Call
3. Public Comment
4. Review of the Consent Calendar
5. Approval of the Minutes
6. Routine Business Items (such as reports)
7. Old Business
8. New Business
9. Adjournment

The Committee Chair has the discretion to change the order of agenda items.

Posting of the Agenda

- Time for Posting:
 - Regular Meetings: No later than 72 hours before the meeting. (§54954.2)
 - Special Committee Meetings. The agenda for a Special Committee Meeting shall be posted no later than 24 hours before the meeting. (§54956)
- Place and Manner of Posting:
 - On the San Bernardino County Homeless Partnership website (<http://www.sbcounty.gov/sbchp>)
 - At the meeting site.
 - In both instances, the agenda must be freely accessible to all members of the public (§54954.2)

Distribution of the Agenda Package

On the same day the agenda for a committee meeting is posted, the agenda will be transmitted electronically to:

- Each committee member.
- Members of the public having filed written or electronic requests to receive notifications.

Conduct of a Committee Meeting

In general, the conduct for committees shall be followed in accordance with the Code of Conduct and Principles of Decorum as described in the Governance Charter.

Quorum and Voting

A quorum consists of a majority of the committee present in person or participating virtually in accordance with the stipulations of the Brown Act. A majority of the voting committee members is needed to carry a motion or other action. When virtual

participation from other locations within the CoC is part of the meeting quorum, votes should be delayed until members in those locations can participate electronically. When a quorum of voters present is not possible due to conflicts of interest, but decision on the matter at hand is required to avoid clear detriment to the CoC, the Rule of Necessity may be invoked. The Chair of every committee can vote as a member of the committee, so long as the Conflict of Interest rules are followed.

In general, committee proceedings should be conducted using the Principles of Decorum and will activate Roberts Rules of Order when necessary to maintain order.

Rights of Members of the Public

Members of the public have the right to:

- Attend all meetings of a committee except where confidential or exempt information is likely to be disclosed (in which case that part of the meeting will be held in closed session);
- Have access to reports and supporting documents, and any records of decisions made by the committee unless they contain confidential or exempt information; and
- Right to complain to the committee regarding breaches of Code of Conduct or violations of these policies or policies under the CoC's Grievance Policy.

Responsibilities

Members of the public are expected to follow the Rules of Decorum when engaging in CoC meetings, including subcommittees. A member of the public who is violent, abusive, or threatening to any other person while at a meeting, or disrupts the ability of the meeting members to conduct business may be excluded from the meeting by the Chair, Co-Chair, or Coordinator of the meeting until such conduct is resolved.

Equal Opportunity

In all of its dealings with members of the public, the members of each committee will endeavor to provide the highest level of service and aim to distribute services fairly across the community, (except where they need to or by law must be targeted to meet special needs) regardless of age, gender, marital status, disability, color, race, nationality, ethnic and national origin, religious beliefs or sexual orientation and will thoroughly investigate any complaint of noncompliance with this policy.

Geographic Coverage and Community Input

To ensure effective communication with other stakeholders, the CoC will seek input from various groups and associations throughout the CoC. Liaisons will seek input and advice from each region of the CoC and systems and organizations that contribute to achieving the CoC objectives.

The CoC geography is comprised of five (5) geographic regions. Information from each region and regular communication each region is essential to effective planning for the provision of housing and services to people living in homelessness, or at risk of homelessness. To ensure these vital connections, Liaisons will be responsible for participating in homeless activities in the regions. The regions are identified as:

- Central Valley
- Desert

- East Valley
- Mountains
- West Valley

To ensure inclusive participation of a wide array of other community systems and organizations, the CoC will seek input from subject matter experts, professionals, and advocates and persons with lived experience enhances the understanding of homelessness, special -needs subgroups, and community resources. The CoC will outreach to each of these community assets to learn from them hear their perspectives on CoC plans and strategies.

Community- Based Input

CoC Liaisons will meet with community groups and other professionals as often as necessary to inform CoC goals and actions. Each Liaison will provide a summary of activities, key information and recommendations and report back to the CoC and Board through the CoC Secretary at each meeting, or as requested by the Board.

Although not part of the formal CoC governance structure, information from community experts and regional groups assists the CoC by:

- Offering information about regional priorities, goals, and strategies
- Facilitating regional alignment of resources and service coordination.
- Announcing opportunities for regional participation in CoC activities.
- Engaging a broad range of public and private stakeholders in regional planning and coordinated service delivery.
- Providing insight on service gaps and needed projects or resources.

Regional Steering Committees

Regional Steering Committees (RSC) are regionally-based committees that advise the CoC Membership and Board. These committees are constituted by the organizations in their respective areas, and function as subcommittees to the CoC.

Regions

The Regional Steering Committee group is comprised of five (5) regional groups representing the following regions as identified in the Governance Charter:

- Central Valley
- Desert
- East Valley
- Mountains
- West Valley

Members

Each RSC is constituted by the relevant parties in the subregion and are typically comprised of CoC members, members of the provider networks, and representatives from each regional city, incorporated and unincorporated, schools, county agencies, and public and private entities.

Meetings

Each RSC will meet as often as necessary to accomplish their purpose. Each RSC will

retain meeting minutes and make them available to the CoC and Board through the CoC Secretary and provide a summary of activities and other recommendations monthly or as requested by the Board. Each Regional Steering Committee may create subcommittees to focus on specific issues, challenges, or projects related to the committee's tasks.

Role and Functions

Regional Steering Committees are able to provide leadership and serve as a regional advisory body to the CoC through a selected regional liaison to the CoC Board. Although governed externally, RSCs assist the CoC by:

- Setting regional priorities, goals, and action steps as adopted by the CoC.
- Facilitating regional alignment of resources and service coordination.
- Coordinating regional participation in CoC activities.
- Engaging a broad range of public and private stakeholders in regional planning and coordinated service delivery.
- Providing project funding priorities and recommendations to regionally fund resources, based on a project prioritization process.
- Facilitating alignment across the CoC as a whole for coordinating, planning, and investment.

Committee Name	Category	Protocol	Description
CoC Governance Board (Board)	Decision-Making	Brown Act	<ul style="list-style-type: none"> Charged with substantial responsibilities, authorities, leadership, and support duties as identified in the Chapter 3: CoC Board of this Governance Charter¹⁸. Required by the U.S. Department of Housing and Urban Development (HUD) regulations¹⁹.
Membership Committee	Advisory to CoC	CoC Decorum, Robert's Rule	<ul style="list-style-type: none"> Assists with the ongoing review of the CoC Governance and the enhancement of CoC Member participation. Collaborates with the Board Chair and County Counsel to enhance an understanding of the Charter and Rules to refine for clarity, as needed. Develops membership procedures, and reviews strategies for the recruitment of new members. Develops and implement strategies for welcoming new Board members. Implements strategies for re-instating lapsed members.
CoC Performance Oversight and Review Committee	Advisory	Brown Act	<ul style="list-style-type: none"> Assists with monitoring the CoC's strategic, operational, fiscal, and grant performance of federal and state CoC funded programs. The Performance Oversight and Review Committee: Ensures: <ul style="list-style-type: none"> Alignment between local, state and/or HUD strategic priority system performance measures and local performance measures as established in accordance with regulation. Optimal performance of the CoC through the actions of task groups focused on evaluating key areas of system design and performance. (Although the Performance Oversight and Review Committee is a Standing Committee, a task group could be time-limited and convened for the period of time needed to accomplish the assigned task [to: Provides oversight of CoC-funded recipients, reviews data outcomes, and makes recommendations based upon documented outcomes. Reviews annual performance of organizations and/or programs and provides strategic recommendations regarding outcomes to the Board. Provides recommendations on current policies and procedures for accessing the CoC homeless service delivery system, complementing County contract compliance standards.
Regional Steering Committees (established though the Homeless Partnership Network)	Advisory	Brown Act	<ul style="list-style-type: none"> Provide information and insight of the needs and priorities of the geographic subregion. Helps facilitate communication between the subregion and the CoC Membership and Board.
Youth Action Board (YAB)	Advisory	Brown Act	<ul style="list-style-type: none"> Provides feedback and leadership on issues related to youth and young adult homelessness. Leads discussion and forms recommendations regarding youth -dedicated funding, subject to funding source regulations and ratification by the CoC Board.

¹⁸ Chapter 3: CoC Board
¹⁹ 24 CFR 578.

Appendix to Chapter 8

Brown Act² Excerpts Related to Meetings - Definitions

Legislative Body

Advisory committees, composed solely of the members of the legislative body that are less than a quorum of the legislative body are not legislative bodies, except that standing committees of a legislative body, irrespective of their composition, which have a continuing subject matter jurisdiction, or a meeting schedule fixed by charter, ordinance, resolution, or formal action of a legislative body are legislative bodies for purposes of this chapter.

Meeting

As used in this chapter, “meeting” means any congregation of a majority of the members of a legislative body at the same time and location, including teleconference location as permitted by Section 54953, to hear, discuss, deliberate, or take action on any item that is within the subject matter jurisdiction of the legislative body. [54952.2.\(a\)](#)

Applicability of the Brown Act

The Brown Act does not apply to the CoC Membership nor several meeting situations, such as:

(6) The attendance of a majority of the members of a legislative body at an open and noticed meeting of a standing committee of that body, provided that the members of the legislative body who are not members of the standing committee attend only as observers. [54952.2. C \(6\)](#)

² Ralph M Brown Act: California Government Code § 54950, 1953.

Chapter 9

Code of Conduct

Contents

Introduction	2
References	2
Overview	2
CoC Responsibilities	2
CoC Members	2
Principles of Decorum and General Conduct	3
Stewardship of Resources	3
Conflict of Interest	4
Protection of Confidential Information	4
Public Statements and Media Response	4
Response to Charges of Violations of the Code of Conduct	4
Code of Conduct Violation Hearings	4
Documentation of Board Action	5
Ability to Conduct Business Under Government Awards	5
Debarment or Suspension by Public Funding Sources	5
Response to Non-Compliance with Administrative Requirements	6
Chapter Appendix	7

Introduction

Continuum of Care (CoC) entities engaged in activities supported by federal resources are required by federal regulations to develop and follow a Code of Conduct. This chapter addresses information related to the San Bernardino City and County CoC (SB CoC) Code of Conduct.

References

The following references are applicable to the information in this chapter:

- 2 CFR 200
- 24 CFR 578

Overview

The U.S. Department of Housing and Urban Development (HUD), as well as the State of California, offer substantial resources to address homelessness in the CoC. The CoC is entrusted with specific responsibilities related to the use of public funds invested in addressing a serious community concern, that being homelessness. Members are expected to observe the highest standards of ethical conduct in the execution of these responsibilities. In addition to federal and state regulations, administrative publications help guide individual and organizations in implementing Code of Conduct standards.

CoC Responsibilities

The CoC:

- Establishes a Code of Conduct for the management of the CoC's core structures (CoC Membership, CoC Board, subcommittees, ad hoc committees and working groups), and
- Ensures the Homeless Management Information System (HMIS) Lead Agency, Coordinated Entry System (CES) Lead Agency, and recipient organizations have:
 - Established a Code of Conduct compliant with federal regulation, and
 - Registered their codes on the Code of Conduct e-Library.²⁰

CoC Members

In most instances, participating CoC members are employed by a responsible public, non-profit or private sector agency or firm that has an adopted Code of Conduct or Employee Manual that controls the behavior of the employee in the conduct of business on behalf of his/her employer. When conducting business on behalf of the CoC, each person and organization will abide by the Code of Conduct established by the CoC. Concerns about member conduct, will be referred to the Bylaws and Membership Committee and, if warranted, for investigation and possible referral of the individual or member's agency for any personnel or legal action that may be warranted.

Members are expected to carry out the mandate of the CoC to the best of their ability and maintain the highest standards of integrity for actions with other Members of the Board, CoC Representatives, Service Recipients, Service Providers, and members of the public. Members of the Board and Standing Committee Chairpersons will complete ethics training or ethical standards review at the beginning of their initial term of office.

²⁰ <https://www.hud.gov/sites/dfiles/SPM/documents/CodeofConductE-Library>

Principles of Decorum and General Conduct

While Roberts Rules of Order inform the official foundation of meeting management, the SB CoC strives to promote an inclusive, cordial, and consensus-building environment focused on achieving positive outcomes for the people/communities being served. To that end, CoC meeting decorum are based on the following basic principles:

- **Safe, Non-Abusive Space:** This is a safe space where everyone's opinion matters. Therefore, members of the CoC are expected to conduct themselves with courtesy and respect without harassment, physical or verbal abuse, or threats of abuse.
- **Inclusion of many voices:** We aim to allow every CoC member the opportunity to give input. Please be respectful of the person speaking, and do not speak while they are speaking. When it is your turn to speak, please do not disparage another person or agency with your comments.
- **Respect of time limits:** Please be respectful of the time we have for meetings. Arrive on time, plan to stay for the entire meeting, and don't take up too much time when it's your turn to speak/give input.
- **Resolution of Conflicts:** If you have a grievance/complaint against another CoC member/member organization, the issue should first be brought to the attention of the person/organization before being addressed at a public meeting. If the matter cannot be resolved, consider filing a formal grievance as implemented by the CoC.
- **Professionalism:** Professional conduct is an expectation. Professionalism is portrayed in your demeanor and quality of behavior that is open, respectful, and poised. Professionalism is marked by 'emotional intelligence' (EQ), shown in actions that are calm and confident, but not aggressive. EQ allows us to gracefully listen to each other even if opinions differ. Unprofessional behavior is always prohibited. Examples of unprofessional behavior includes, but is not limited to, spoken, written, virtual, cyber-bullying, and physical conduct and expressions that are threatening, berating, vulgar, degrading, demeaning or intended to show contempt or disdain for another. This applies regardless of if the person is present or observes the behavior. Such conduct is prohibited if it is directed at or relates to members of the Board, Committee Members, Members of the CoC, and members of the public, whether or not they are present to observe the behavior.
- **Reliable and Accountable:** Working together successfully is founded on personal reliability and accountability. Each of us are expected to follow through on commitments and be accountable to each other to achieve shared goals for the good of the community. All CoC Members are expected to exercise adequate control and supervision over matters for which they are individually responsible.
- **Ethics:** Ethical behavior conforms to policies and standards and promotes fairness, equity, and cultural competence. Personal relationships should not result in special considerations, including bias or favoritism, which influence the performance of their official duties in a manner contrary to the interest of the broader CoC.
- **Public Conduct:** The Principles of Decorum extend to actions beyond the official meeting time. When engaging in CoC business, actions should reflect the Principles of Decorum in any public forum or engagement.
- **Retaliation:** Retaliation is prohibited against any person who makes a complaint about a Member's professional behavior.

Stewardship of Resources

Board Members must assure the resources entrusted to them are used for conducting

official business only. CoC, CoC Board, and Standing Committees members must abide by the Conflict-of-Interest Policies established for CoC operations.

Conflict of Interest

The CoC Conflict of Interest Policy including details of all HUD required policy elements is found in Governance Charter Chapter 10.

Protection of Confidential Information

In line with the rules and guidelines of the CoC, Members of the CoC and the CoC Board have a responsibility to protect the security of any confidential information provided to, or generated by, the activities of the CoC. The CoC will comply with:

- Regulations protecting Personally Identifiable Information (PII), and
- Protections afforded for persons:
 - Covered by:
 - Federal regulations (24 CFR 578.), and
 - The Violence Against Women Act (2022 Reauthorization), and
 - In protected classes under anti-discrimination.

Public Statements and Media Response

When making public statements or speaking to the media on CoC matters, Board Members will make clear whether they are speaking in their own name or if the CoC or Board Chair has empowered them to speak on the group's behalf.

Response to Charges of Violations of the Code of Conduct

Violations of any provision of this Code of Conduct may result in appropriate disciplinary action, which may include censure, removal of Membership, permanent disqualification from holding future Board positions, and/or referral to appropriate authorities for civil and/or criminal prosecution. Determinations made with respect to potential violation of the Code of Conduct shall in no way preclude or replace any other action that may be warranted by the Code.

Violations of the Principles of Decorum including items that are not included in the e-Library Code of Conduct, may result in the member being: reminded of the Principles of Decorum; requested to cease and desist from the aberrant behavior; excluded from the meeting; escorted from the meeting site; suspended from meeting attendance; removed from membership; or other actions, such as security or law enforcement intervention, as deemed necessary by the convenor or Chairperson.

Code of Conduct Violation Hearings

The Bylaws and Membership Committee upon a motion supported by a two-thirds (2/3) vote, may choose to conduct a hearing concerning a possible violation of this Code of Conduct by a Member of the Board. The Board Member accused of violating this Code of Conduct will have thirty (30) days' notice prior to a hearing on the matter. The accused Council Member may bring witnesses on his or her behalf to the hearing, and the Bylaws and Membership Committee may elect to call witnesses to inquire into the matter.

If found, by a vote of two-thirds of the Bylaws and Membership Committee, that the

accused Board Member has violated this Code of Conduct, the Committee will recommend an appropriate sanction to be implemented. A Board Member subject to sanction may, within thirty (30) days of such sanction vote by the Bylaws and Membership Committee, challenge the recommendation for full Board consideration prior to the final decision of the Board. A record of the decision of the full Board to sanction a Member for a violation of this Code of Conduct will be placed in the minutes of the Board.

If requested by a majority, the Committee may also give guidance to the CoC concerning other aspects of conduct, including actions of staff, consultants or other persons charged with implementation of duties relative to the responsibilities of the Board.

Documentation of Board Action

The CoC Board must conduct/transact business in a fair and transparent manner. To this end, the Board will promptly create a record of actions, considerations, and decisions to be made available to members of the public in accordance with the California Public Records Act [CA Government Code, section 6250, et seq.]. Meetings of the Board are open to members of the public wishing to observe in accordance with established By-Laws. The public may address the Board at its regular meetings concerning any matter within its purview during the time set aside for public comment. If a Visitor to a Board meeting is verbally or physically disruptive to the proceedings, they may be asked to leave.

Ability to Conduct Business Under Government Awards

The CoC acknowledges the Code of Conduct for Doing Business under Federal Awards, “Conducting Business in Accordance with Ethical Standards” requirements as identified in the [Administrative, National & Departmental Policy Requirements and Terms for HUDs Financial Assistance](#).²¹ (‘Admin Policy’) and the U.S. Department of Housing and Urban Development (HUD) regulations 24 CFR 578. as the standards for the CoC Code of Conduct.

The elements of these requirements are incorporated, by reference, in the CoC Code of Conduct and the Conflict-of-Interest Chapters of the CoC Charter. Each CoC and ESG recipient and subrecipient organization must file a Code of Conduct compliant with federal regulations (2 CFR 200) with the HUD Code of Conduct e-Library. Instructions for filing a Code of Conduct are found in the Appendices...

Debarment or Suspension by Public Funding Sources

Members of the Board must be eligible to transact business with federal and local government. At the time of nomination, potential Members of the Board must not be individuals or representatives of agencies that are barred or suspended from transacting business with federal, state, or local government. Similarly, organizations applying for funding through the CoC must be able to transact business with federal and local government, as well as meet HUD organizational threshold criteria specified by the funding opportunity announcement. These criteria serve to protect the use of public funds from fraud, mismanagement, and promote effective use of funds in the community. Review of the Board Member eligibility is incorporated into the annual election process.

²¹ <https://www.hud.gov/sites/dfiles/SPM/documents/AdminReqsandTermsFY2023-10282022.doc>

Response to Non-Compliance with Administrative Requirements

Entities that are not in compliance with the requirements identified in the federal Admin Policy or which are debarred or suspended from doing business with the federal or local government will not be allowed to apply for or receive funding through the CoC until the organization provides evidence from the applicable governmental entity that corrective action has resulted in reinstating the organization's status as eligible to apply.

Chapter 9 Appendix Registration of a Code of Conduct

Registration of an Organizational Code of Conduct

To be listed in the Code of Conduct e-library as required by HUD CoC policies, forward an electronic copy of the Code of Conduct statement to: askGMO@hud.gov

The email should contain:

1. Organization UEI#
2. Organization Legal Business Name (from the System for Award Management website [SAM.gov])
3. Complete mailing address
4. Name, title, email, and phone number for the person with executive authority.
5. Electronic code of conduct statement (searchable documents preferred)

The [Code of Conduct e-library](#) will be recorded in a single Microsoft Excel workbook displaying organizations with compliant Code of Conduct policy submissions. The Code of Conduct e-library is updated at least quarterly.

On Agency Letterhead

(Note: A cover letter on the company's letterhead must provide the name and title of the responsible official, mailing address, business telephone number and email address).

I. REQUIRED COVER LETTER

ABC Agency (LEGAL NAME)

UEI # _____

To All Interested or Invested Parties (or To Whom It May Concern):

The *ABC AGENCY* Code of Conduct for doing business with other entities and individuals, including federal departments, is designed for compliance with applicable regulations. For U.S. Department of Housing and Urban Development (HUD) under the Continuum of Care (CoC) the core regulations are found in 2 CFR part 200; 24 CFR part 578; and 24 CFR part 576.

Within *ABC Agency* the (name of position such as Executive Director, Board President, compliance officer) is responsible for compliance with the organizational Code of Conduct, including the Conflict-of-Interest Policy. The contact information for this individual is:

Name of Individual _____

Title or Position _____

Mailing Address _____

City _____ State _____
Zip code _____
E-Mail Address _____
Telephone Number _____ Fax Number _____

A copy of the organizational Code of Conduct for Doing Business Under Federal Awards, is attached for review and registry in the [Code of Conduct e-library](#).

Respectfully submitted,

SIGNATURE

Executive Director (or Title of Authorized Administrator)

(Code of Conduct Attached).

Chapter 10

Conflict of Interest

Contents

Introduction	2
Purpose	2
Interested Individuals	2
Interested Organizations	3
Term of Restriction	3
Minimum Requirements	3
Gratuities and Inducements	4
Procuring Property and Services	4
Disclosure of a Conflict of Interest	4
Affirmation Statement	4
Recusal of Self	5
Implementation of Policy	5
Recusal Protocols	5
Record of Declarations and Recusal Proceedings	6
Administrative and Disciplinary Actions	6
Conflict of Interest and Maintenance of Quorum	7
Rule of Necessity	7
CoC Circumstances for Invoking the Rule of Necessity	7

Introduction

Recipients (grantees) and subrecipients of Continuum of Care (CoC) funds are required to create, submit, and follow a Code of Conduct compliant with 2 CFR 200.317 and 318, including a Conflict of Interest policy that meets U.S. Department of Housing and Urban Development (HUD) regulations in 24 CFR 578.95. The CoC is responsible for ensuring compliance with these regulations. This chapter addresses information related to the Conflict of Interest policy.

Purpose

The purpose of the CoC Conflict of Interest policy is to emphasize the CoC's commitment to the highest standards of integrity, fairness and conduct to ensure the public trust. Members of the CoC are expected to conduct themselves in the best interest of the community with the highest integrity. The policy is intended to meet HUD's regulatory requirements but does not replace additional, applicable state and federal laws governing conflicts of interest applicable to nonprofit and charitable organizations. The intent is to avoid any actual conflict of interest or the appearance of a conflict of interest. Each person to whom this policy applies must be free of any activity, association, or investment which might influence, or give the appearance of interfering with, the independent exercise of his or her judgment in conducting the CoC's activities or in dealing with the CoC.

Policy

Participants in the CoC will refrain from engaging in actions that constitute or appear to constitute a conflict of interest as described in this policy when conducting CoC business.

Interested Individuals

No member or spouse, dependent, or other immediate family of the member, may participate in or influence discussions and/or decisions concerning the award of a grant or other financial benefits to an organization that the member represents or is directly connected to, nor to themselves as individuals²².

All CoC personnel and representatives, whether paid or unpaid, will refrain from any real or perceived conflicts of interest as described in 24 CFR 578.95 as well as any applicable program regulations, grant agreements, or contract specifications.

HUD rules under 24 CFR 578.95(b) specifically state that no CoC Board Member may participate in or influence the discussions or resulting decisions concerning the award of a grant or other benefits to the organization the member represents. HUD rules in 24 CFR 578.95(c) specify organizational conflicts of interest, while part 24 CFR 578.95(d) is related to other conflicts. The statements emphasize and further explain, but do not eliminate, the requirements under 2 CFR 200. The 24 CFR 578.95(d) 1. is clear that that the restrictions extend to family members, subrecipients and other individuals and organizations with whom has business ties and that the term of restriction endures for one year following the tenure of service.

²² Directly connected includes any official relationship, such as participation as a staff, a member of the Board, contractor or other activities involving financial remuneration or other non-financial benefits.

Interested Organizations

An ‘interested organization’ is described to align with the code of conduct for doing business and ethical standards requirements as identified in the [Administrative, National & Departmental Policy Requirements and Terms for HUDs Financial Assistance](#)²³. (‘Admin Policy’) and the U.S. Department of Housing and Urban Development (HUD) regulations.

An organizational conflict arises when, because of activities or relationships with other persons or organizations, the recipient or subrecipient is unable to or potentially unable to render an impartial decision.

No person who is an employee, agent, consultant, officer, or elected or appointed official representative of a recipient or subrecipient organization and who exercises or has exercised any functions or responsibilities with respect to funded activities, or who is in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have a financial interest in any contract, subcontract, or agreement with respect to, or the proceeds or non-financial benefit, either themselves, or for those with whom they have immediate family or business ties, or the organization(s) they represent.

Term of Restriction

These conflict-of-interest restrictions are applicable to all covered persons during the period for engagement or for one year thereafter. Immediate family ties include (whether by blood, marriage, or adoption) the spouse, parent (including a stepparent), child (including a stepchild), brother, sister (including a stepbrother or stepsister), grandparent, grandchild, and in-laws of an ‘interested’ person or organization.

Similar to conflicts of financial interest, no member may engage in the conflict of representation/commitment. Members who are directly connected to an organization, or whose immediate family are directly connected to an organization, must declare the conflict, and take action as described in this policy into resolve the conflict of representation.

Minimum Requirements

HUD requires the CoC Conflict of Interest Policy to:

- [Address the “Conducting Business in Accordance with Ethical Standards” requirements included in the Administrative, National & Departmental Policy Requirements and Terms for HUDs Financial Assistance;](#)
- Prohibit real and apparent conflicts of interest that may arise among officers, employees or agents, and any member of his or her immediate family, partner, or an organization that employs any of the covered parties;
- Hold that policies also apply to other organizational conflicts of interest;
- Prohibit the solicitation or acceptance of gratuities or inducements in excess of a minimum value by covered persons or organizations, and

²³ Updated in October, 2022.

- Provide for administrative and disciplinary actions to be applied for actions in violation of the standard.

Failure to provide a compliant code of conduct, including the conflict of interest policy, and/or to notify HUD of conflicts of interest can result in sanctions, including removal of HUD funds.

Gratuities and Inducements

Interested persons are covered by the general prohibitions of 2 CFR 200 and the HUD conflict of interest policy under 24 CFR 578 from gaining, or attempting to gain, non-financial benefits through requests for exceptions to policies and procedures that fall outside the standards established for exception. Unsolicited nominal gratuities, for the SB CoC will be defined as gifts, items, or services valued at \$100 or less.

Procuring Property and Services

Conflict of Interest extends to the procurement of goods and services as described in:

- 2 CFR 200.317 for private funds
- 2 CFR 200.318(c) for federal funds
- 24 CFR 578.95 for HUD CoC funds
- 24 CFR 576 for Emergency Solutions Grant (ESG) funds

The only exceptions that are allowed to these procurement guidelines are those contained in a specific list in the Admin Policy and 24 CFR 578.95 (d)2 with written permission from HUD.

Disclosure of a Conflict of Interest

In accordance with regulations, conflicts of interest must be disclosed. Any individual participating in or influencing decision making must identify actual or perceived conflicts of interest/representation as they arise and comply with the letter and spirit of this policy. Disclosure should occur at the earliest possible time and, if possible, prior to the discussion of any such issue. Individuals with a conflict of interest should abstain from discussion and voting on any issue in which they may have a conflict.

Affirmation Statement

To ensure Members are fully aware of the Conflict-of-Interest Policy, the CoC requires each CoC Member (inclusive of Voting Members, CoC Board Members and Committee Members) to annually sign a statement which affirms such person has:

- Received a copy of the Conflict of Interest Policy;
- Read and understands the policy; and
- Agreed to comply with the policy.

Each Member of the CoC will annually sign a statement which declares whether such person has one or more conflicts of interest.

If at any time during the year, the information in the annual statement changes materially, the CoC Member will disclose such changes and revise the annual disclosure form at the earliest opportunity.

The Board Secretary will regularly monitor and enforce compliance with this policy through notice to the Board after reviewing annual statements. The Board will take other actions as are necessary for effective oversight.

Recusal of Self

Any CoC Member, representative, or ‘interested’ person has an opportunity to recuse themselves from involvement in any decision or discussion in which the member believes there may be a real or perceived conflict of interest, without going through a process to determine whether a conflict of interest exists.

Implementation of Policy

The Conflict of Interest Policy will be reviewed annually during review of the Governance Charter.

The disclosure of conflicts of interest statement for each official member will be completed when applying for continuing membership in the CoC. The process will ensure that each representative:

- Has access to the Conflict of Interest Policy;
- Declares that he/she has read and understands the policy;
- Agrees to comply with the policy; and
- Discloses conflicts of interest.

Voting Members need to file the required disclosure statement prior to participating in a discussion or vote on an item where a real conflict of interest applies. All voting members shall have the right to recuse themselves from voting on a matter without providing excuse.

If at any time during the year, the information in the annual statement changes materially, the CoC Member will disclose such changes and revise the annual disclosure form at the earliest opportunity.

Recusal Protocols

Recusal protocols depend on the type of interaction and level of decision under consideration. Covered persons, such as family members, are asked to declare a potential conflict of interest as part of any request to speak as a member of the public on an action item.

The table below provides the recusal protocol to be followed based on the type of conflict:

Situation	Recusal Protocol
Ratification of an action on a Consent Agenda	Member declares a conflict of interest and abstaining from the vote.

Discussion of actions by which the organization or individual may be advantaged	Member refrains from the discussion.
Actions which may impact the organization's/individual's eligibility to apply or receive benefits	Member refrains from discussion and voting.
Decisions related to funding, prioritization, or other direct impact	<p>Member must be absent from the meeting space during discussion and voting.</p> <ul style="list-style-type: none"> • For virtual meetings, the member can leave the virtual forum by exiting the session. • For meetings in-person, the Member must leave the meeting room and may not listen or otherwise observe the session through other means, such as audio or visual technology.

Record of Declarations and Recusal Proceedings

The minutes of meetings:

- The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Board's decision as to whether a conflict of interest in fact existed.
- The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Administrative and Disciplinary Actions

Violations of the Conflict of Interest policies by officers, employees, and CoC representatives, will result in the following actions:

- Administrative actions:
 - Immediate full disclosure of interest and/or the potential profit for said award(s) or contract(s) in writing.
 - A review of said action or interest to the governing Board of Directors and notification to the local HUD field office representative(s).
- Remedies and Disciplinary Actions concerning conflicts of interest:
 - Require the officer, employee, or agent to remove him/herself from any discussions and/or voting relating to the award or contract.
 - Disciplinary action that may result in termination or removal from the office held or position of employment with the organization.
 - Cessation of services or termination of a contract or vendor agreement.
 - Referral for assessment of the legal ramifications associated with the violations, if warranted.
- Policy implementation and tracking includes: The declaration of a conflict of interest noted during a meeting will be referenced in the applicable meeting minutes.

- The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Board's decision as to whether a conflict of interest in fact existed.
- The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.
- The Board will regularly monitor and enforce compliance with this policy by reviewing annual statements and taking such other actions as are necessary for effective oversight.
- This policy is effective until further notice and will be included in the orientation packet during the on-boarding process, and available throughout the Member's term of service by contacting the CoC Board Secretary.

Conflict of Interest and Maintenance of Quorum

When compliance with the Conflict of Interest Policy would result in the committee not meeting a quorum of eligible voters, the Rule of Necessity may be invoked. Guidance for the use of the Rule of Necessity follows:

Rule of Necessity

The Rule of Necessity is a legal principle for circumstances when the disqualification of the person(s) would render a decision-making body unable to take an action that is restricted by time-limits external to the body. In other words, in specific situations, this rule permits a voter to hear and cast a vote in specific situations if it cannot otherwise be heard and failure to take action would create greater harm. This rule is based on the idea that in certain situations, there may be no other option but to allow someone with a conflict of interest to participate in the decision-making process. The Rule of Necessity is often invoked in emergency situations where there is no one else available to make a decision and the decision cannot be delayed.

CoC Circumstances for Invoking the Rule of Necessity

For the CoC, the invocation of the rule must be based on necessity: (i.e., the decision cannot be delayed to another time when a quorum can be convened) **and** the failure to decide would clearly cause greater harm to the mandated responsibilities of the CoC (or Board). The case for necessity **must** be supported by **objective data**, and the process must be clearly documented. Invocation of the Rule of Necessity will be in the records tracking the incidents of Conflict of Interest and recusal. The record **must**:

- Identify there was an actual and specific threat/harm that required immediate action.
- Demonstrate:
 - There was no realistic alternative to taking action at the point in time (i.e., could not be delayed).
 - The harm caused by invoking the Rule of Necessity is not greater than the harm avoided.
- Include the information required by the Conflict-of-Interest Recusal Policy Agenda item, persons involved, etc.).

Invoking the Rule of Necessity must be a rare occurrence. If the CoC/Board pattern of decision-making repeatedly invokes the Rule of Necessity, the pattern will be reviewed to determine if changes are needed in structures, protocols, or representation. Use of the Rule of Necessity by the Board or a committee on four or more occasions during the year will motivate a review.

NEWS

San Bernardino County approves ban on public homeless encampments; nonprofits object



Rene Ray De La Cruz

Victorville Daily Press

Sept. 11, 2025 | Updated Sept. 22, 2025, 3:34 p.m. PT

Key Points AI-assisted summary ⓘ

- San Bernardino County has approved an ordinance to ban homeless encampments on public property deemed dangerous.
- County officials state the goal is to address health and safety risks while connecting individuals to supportive services.
- Nonprofit groups argue the ordinance criminalizes homelessness and fails to address the root causes like the lack of affordable housing.
- The county's action aligns with a recent Supreme Court decision and an executive order from California's governor.

An ordinance that takes a step toward “humanely” eliminating specific homeless encampments was approved by San Bernardino County Board of Supervisors on Tuesday, Sept. 9.

The board [adopted the ordinance](#), which prohibits unhoused people from camping on county public property where individuals are “exposed to dangers” such as flooding, wildfire, extreme cold, extreme heat, rail collisions and traffic accidents.

Meanwhile, the nonprofit [Time for Change Foundation](#) issued a joint press release from the [Inland Region Housing Justice Coalition](#), alleging the ordinance equates to “effectively criminalizing unhoused residents for attempting to survive in public spaces.”

‘Proactive approach’

In a press release about the ordinance, Supervisors Chairperson and Third District Supervisor Dawn Rowe said the number of encampments on county public property has increased over recent years.

“These conditions threaten not only those living within the encampments, but also the broader community,” Rowe stated. “The goal of this ordinance is to address critical health and safety risks, while also ensuring that people experiencing homelessness have access to the care and support they need.”

Rowe added, “Passing this ordinance is an important step in our proactive approach to addressing homeless encampments. It also ensures that people experiencing homelessness have access to the appropriate supportive services.”

County's largest homeless counts

The latest San Bernardino County [Point-in-Time Count](#) revealed the top jurisdictions with the largest number of persons counted as homeless, which include:

- San Bernardino: 1,535
- Victorville: 448
- Fontana: 364
- Ontario: 297
- Colton: 178
- Redlands: 146
- Rancho Cucamonga: 120
- Barstow: 96

Nonprofits push back

The Inland Region Housing Justice Coalition said the “ordinance fails to address the real crisis. Our region’s lack of affordable housing and supportive services.”

“Criminalizing homelessness only deepens poverty and makes it harder for people to get back on their feet,” said Raynesha Belvins, homelessness survivor and advocate of [Time for Change Foundation](#). “We will continue to hold county leaders accountable until real, lasting solutions are prioritized. We need investment in housing, not handcuffs.”

During the public hearing, coalition representatives urged county leaders to prioritize evidence-based strategies proven to reduce homelessness, which include permanent supportive housing, rental protections, addiction treatment, mental health care and wraparound support, coalition officials stated.

“We will continue to push for policies that reflect compassion, equity, and justice,” said Sharon Green, CEO of Victor Valley Family Resource Center.

The coalition alleges that “enforcement targeted policies are both harmful and also costly to taxpayers, while housing-first models save money and lives.”

The Inland Region Housing Justice Coalition said its group includes Time for Change Foundation, IE Tenants Union, Victor Valley Family Resource Center, ACLU of Southern California, Congregations Organized for Prophetic Engagement, Inland Equity Community Land Trust, Inland Congregations United for Change, and Interfaith Movement for Human Integrity.

Moving forward

Following the ordinance adoption, county officials said they will prioritize flood channels and other areas that expose people to critical health and safety dangers and humanely relocate individuals while connecting them to housing and supportive services.

County officials said they have consistently conducted homeless outreach events to engage individuals, and these efforts will continue prior to any encampment clearing.

California’s executive order

The county’s ordinance aligns with an [executive order issued by Gov. Gavin Newsom in July 2024](#), which encourages local governments to adopt policies to address homeless encampments and take action to humanely remove encampments.

Newsom’s order came on the heels of the Supreme Court’s [decision](#) that gave local and state governments more latitude to [remove people experiencing homelessness from their streets](#).

Newsom could not force cities and counties to dismantle homeless encampments, but advised local authorities on the best way to take action.

Victorville’s policies

At that time, Victorville city spokeswoman Sue Jones said the directive won't change much, since the city's policies are already in line with the executive order.

"The city of Victorville's primary goal is to connect our unsheltered community to services and assistance to break the cycle of homelessness," Jones said in 2024. "We will continue to have our five-member Homeless Engagement Team working directly with our unsheltered community to connect them with services including sheltering services."

Victorville city officials in June reported that the city had experienced a 57% decrease in its unsheltered population from 2024.

The drop in unsheltered individuals in Victorville came from San Bernardino County’s [2025 Point in Time Count](#), which was released in May.

Additionally, Victorville’s overall homeless count, which includes unsheltered individuals and those living in shelters and interim housing, dropped by 27% since 2024, from 611 to 448.

Daily Press reporter Rene Ray De La Cruz may be reached at RDeLaCruz@VVDailyPress.com. Follow him on X @DP_ReneDeLaCruz

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The Board of Supervisors of the County of San Bernardino, State of California,
ordains as follows:

(a) On July 25, 2024, Governor Gavin issued Executive Order N-1-24. The Executive Order states “[l]ocal governments are encouraged to adopt policies consistent with this Order and to use all available resources and infrastructure, including resources provided by the State’s historic investments in housing and intervention programs where appropriate and available, to take action with the urgency the crisis demands to humanely remove encampments from public spaces, prioritizing those encampments that most threaten the life, health, and safety of those in and around them.”

(c) These encampments pose significant risks to public health and safety, including increased fire hazards, accumulation of waste, obstruction of public access and public health risks.

(e) Residents of homeless encampments face considerable health and safety risks including exposure to the elements, worsening of chronic health conditions, increased vulnerability to crime and theft and more prolonged periods of homelessness.

(f) The County is committed to addressing homelessness through a comprehensive approach that includes providing adequate shelter and supportive services.

SECTION 2. Chapter 9 is added to Division 8, of Title 2 of the San Bernardino County Code to read:

CHAPTER 9: UNLAWFUL CAMPING AND OBSTRUCTION OF PUBLIC RIGHTS OF WAY

Section 28.0901 Definitions.

Section 28.0902 Unpermitted Camping on Public Property Prohibited

Section 28.0903 Obstruction of Public Access to Sidewalks, Trails, Public Facilities, and Other Public Rights of Way, and Other Public Offenses

Section 28.0904 Abatement of Encampments and Camp Facilities and Materials

Section 28.0905 Enforcement

Section 28.0901 Definitions

For purposes of this chapter, the following words or phrases shall have the following meanings:

CAMP. To place, pitch, establish or occupy any temporary structure or materials including but not limited to the laying down of bedding or erecting a tent for the purpose of temporarily, irregularly, or permanently sleeping, staying, living, or residing. An activity shall constitute camping or lodging when it reasonably appears, in light of all circumstances, that the individual(s), in conducting these activities, are in fact using the area as living accommodations regardless of the intent of the individual(s) or the nature of any other activity in which they may be engaging.

CAMP FACILITIES OR MATERIALS. Includes but is not limited to, tents, huts, tarpaulins, cardboard boxes, blankets, bedrolls, mattresses, cots, sleeping bags, hammocks, lawn and folding chairs, cooking equipment, fire starters, materials used for fire fuel, ice chest, and similar items, or vehicles, including Recreational Vehicles (RV),

operable or otherwise.

ENCAMPMENT. Places where a group of individuals reside that is not intended for long-term, continuous occupancy.

ENFORCEMENT OFFICER. Shall have the same meaning as defined in Section 11.0202 of the County Code.

PERSONAL PROPERTY. Tangible personal belongings or possessions, which shall include any movable or tangible thing that is subject to ownership; property or chattels that can be seen, weighed, measured, felt, or touched, including, but not limited to, furniture, appliances, items used for camping such as tents or bedding, money, books, and shopping carts.

PUBLIC PROPERTY. Includes but is not limited to, public buildings, streets, sidewalks, trails, alleys, medians, greenways, easements, parks, waterways, canal banks, county highways (as defined in sections 25, 960.5 and 1480 of the California Streets and Highway Code, or as amended), and other rights of way dedicated for public use and lawfully accepted by the County, and other public amenities.

STORE and STORING. To put aside or accumulate for later use, to put for safekeeping, to place or leave in a location.

Section 28.0902 Unpermitted Camping on Public Property Prohibited

(a) It is unlawful and a violation of this code for any person(s) to camp, occupy camp facilities, or use camping materials on public property not specially designated for day and/or overnight campgrounds.

(b) This section shall not apply to public property specifically designated for camping or where camping has been authorized by a responsible local, state, or federal agency. Persons desiring to camp on County owned, controlled, or maintained public property designated for camping must comply with Chapter 3 of Division 8 of Title 2 of this Code and the permitting requirements of Section 28.0305 of this Code. Persons desiring to camp on public property owned, controlled, or maintained by a department of

1 the United States, the California Department of Parks and Recreation, or other local public
2 agencies must comply with the applicable laws, regulations and permitting requirements
3 of the responsible department of the United States, the California Department of Parks
4 and Recreation, or other local public agencies.

5 (c) Nothing in this ordinance shall prohibit the possession or transportation of
6 camping facilities or materials on public property, unless otherwise in violation of this
7 ordinance.

8 (d) Persons desiring to use county-owned grounds or buildings for public
9 meetings and other approved uses must apply for a public use permit if required by this
10 Code or County policy.

11 (e) In the situation where an unpermitted camp is erected and no exigent
12 circumstances exist to public safety, notification to vacate shall be provided at least 72
13 hours prior to enforcement action.

14 (f) Notwithstanding subsection (e), if a camp or an encampment poses an
15 imminent threat to life, health, safety or infrastructure, advanced notice to vacate shall be
16 provided only as reasonably necessary under the circumstances.

17 (g) Nothing in this Chapter shall be read to permit camping on private property
18 in violation of the San Bernardino County Code including Section 84.25.070.

19
20 **Section 28.0903 Obstruction of Public Access to Sidewalks, Trails, Public**
21 **Facilities, and Other Public Rights of Way, and Other Public Offenses**

22 (a) No individual shall obstruct a street, sidewalk, alleyway, trail, county
23 highway (as defined in sections 25, 960.5 and 1480 of the California Streets and Highway
24 Code, or as amended), entrance to public facilities, driveway, or other public right of way
25 by sitting, lying or sleeping, or using or storing personal property in, or upon any street,
26 sidewalk, alleyway, trail, or county highway.

27 (b) Immediate Removal: Personal Property in violation of this Section shall be
28 subject to immediate removal by Enforcement Officers.

Section 28.0904 Abatement of Encampments and Camp Facilities and Materials

(a) Notwithstanding Section 28.0903(b), the County may abate or remove camp facilities and materials, personal property (subject to Section 28.0904(d)), or an encampment established in violation of this chapter after providing written notice of such abatement. Any camp facilities and materials, or encampments established in violation of this chapter may be subject to abatement without advanced written notice by the County, if the encampment poses an imminent and substantial threat to public health or safety, as determined by the Enforcement Officer.

(b) Except in circumstances governed by Section 28.0903 or where there is an immediate threat to public health or safety, prior to abatement the County will, to the extent possible, provide homeless outreach services to affected individuals in an effort to connect unhoused residents to services. This subsection is directory, not mandatory, and the failure to provide homeless outreach services specified in this subsection does not affect the validity of an abatement action

(c) Abatement pursuant to this section may include, but is not limited to, removal of camp facilities and materials, personal property, trash, debris, junk, hazardous waste, infectious waste, and vehicles.

(d) Personal Property taken that does not constitute a health or safety hazard, shall be collected, inventoried, and stored for at least 90 days. Personal Property that constitutes a health or safety hazard may be immediately discarded. Examples of Personal Property that constitutes a health or safety hazard and may be immediately discarded includes, but is not limited to, the following:

(i) Sharp objects, such as needles, scissors, knives, that can pierce skin and potentially contribute to the spread of disease.

(ii) Chemicals: bleach, paint, oils, etc.

(iii) Items (including bedding and clothing) soiled by infectious materials, including human waste and bodily fluids.

- 1 (iv) Moldy, mildewed items.
- 2 (v) Items that may be infested by rodents and insects, including rats,
3 mice, fleas, lice, and bed bugs.
- 4 (vi) Items that pose a risk of fire or explosion, combustibles and propane
5 tanks; any item containing fuel or corrosives or other unidentified liquids.
- 6 (vii) Perishable items such as food.
- 7 (viii) Controlled substances and contraband.
- 8 (ix) Backpacks and closed containers that have been determined by an
9 individual who is licensed to identify and handle hazardous materials to contain one or
10 more of the items listed above. Such backpacks and closed containers may be discarded
11 where no individual who is licensed in hazardous materials is present to make a
12 determination.
- 13 (x) If personal belongings are co-mingled or littered with needles, human
14 waste, or other health risks, the entire pile of belongings may be disposed of. The
15 presence of clothing in a backpack or container shall not be the sole reason to discard
16 the backpack or container.

17

18 **Section 28.0905 Enforcement**

- 19 (a) A violation of this chapter is declared to be a public nuisance and subject to
20 the penalties stated herein.
- 21 (b) Notwithstanding any other provision of the San Bernardino County Code,
22 each person violating, causing, or allowing a violation of any provision of this Chapter,
23 shall be guilty of an infraction, unless the violation is specifically declared to be a
24 misdemeanor.
- 25 (c) Except as otherwise provided herein, upon conviction or upon a plea of nolo
26 contendere (commonly called "no contest"), by a base fine not exceeding \$100.00 for a
27 first violation; a base fine not exceeding \$200.00 for a second violation of this Chapter
28 within one year; and a base fine not exceeding \$500.00 for each additional violation of

1 this Chapter within one year of the first violation. The maximum fines imposed in this
2 Section are based upon the provisions of Government Code Section 25132 and will be
3 increased automatically and without amendment to this Section upon any amendment to
4 Government Code Section 25132 increasing the amount of fines permitted. Any court
5 costs that the court may otherwise be required to impose pursuant to applicable State law
6 or local ordinance shall be imposed in addition to the base fine.

7 (d) As an alternative to a fine, the County would encourage the Court to grant
8 diversion or probation with a condition the offender complete a rehabilitation program or
9 treatment plan.

10 (d) Nothing in this Section shall be interpreted as limiting an Enforcement
11 Officer from impounding a vehicle used in violation of this Chapter if permitted by Vehicle
12 Code Section 22651.

13
14 SECTION 3. The Board of Supervisors declares that it would have adopted this
15 ordinance and each section, sentence, clause, phrase, or portion of it irrespective of the
16 fact that any one or more sections, sentences, clauses, phrases, or portions of it are
17 declared invalid or unconstitutional. If for any reason any portion of this ordinance is
18 declared invalid or unconstitutional, then all other provisions of it shall remain valid and
19 enforceable.

20
21 SECTION 4. This ordinance is exempt from the requirements of the California
22 Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines, as it is not a
23 "project" and has no potential to result in a direct or reasonably foreseeable indirect
24 physical change to the environment. Further, this ordinance is exempt from CEQA as
25 there is no possibility that this ordinance or its implementation would have a significant
26 negative effect on the environment. The Community Development and Housing
27 Department shall cause a Notice of Exemption to be filed as authorized by CEQA and
28 the State CEQA Guidelines.

SECTION 5. This ordinance shall take effect thirty (30) days from the date of adoption.

DAWN ROWE, Chair
Board of Supervisors

SIGNED AND CERTIFIED THAT A COPY
OF THIS DOCUMENT HAS BEEN DELIVERED
TO THE CHAIR OF THE BOARD

LYNNA MONELL, Clerk of the
Board of Supervisors

1 STATE OF CALIFORNIA)
2) ss.
3 SAN BERNARDINO COUNTY)

4 I, LYNNA MONELL, Clerk of the Board of Supervisors of San Bernardino County,
5 State of California, hereby certify that at a regular meeting of the Board of Supervisors of
6 said County and State, held on the 10th day of September, 2025, at which meeting were
7 present Supervisors: Col. Paul Cook (Ret.), Jesse Armendarez, Dawn Rowe, Curt
8 Hagman, Joe Baca, Jr., and the Clerk, the foregoing ordinance was passed and adopted
9 by the following vote, to wit:

10 AYES: SUPERVISORS: Col. Paul Cook (Ret.), Jesse Armendarez,
11 Dawn Rowe, Curt Hagman, Joe Baca, Jr.

12 NOES: SUPERVISORS: None

13 ABSENT: SUPERVISORS: None

14 IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal
15 of the Board of Supervisors this 9th day of September, 2025.

16 LYNNA MONELL, Clerk of the
17 Board of Supervisors of
18 San Bernardino County,
19 State of California

20 _____
21 Deputy

22 Approved as to Form:

23 TOM BUNTON
24 County Counsel

25 By: _____
26 JOLENA E. GRIDER
27 Deputy County Counsel

28 Date: _____