



---

**Meeting Agenda  
Continuum of Care (CoC) Board  
Wednesday, October 14, 2020**

Click Link to Join Zoom Meeting

<https://us02web.zoom.us/j/89005635913?pwd=NUZiSzZlZnFYamhVVzITQmJrNWVwZz09>

Meeting ID: 890 0563 5913

Passcode: 900164

1. Call to Order
2. Board Comments
3. CoC Staff Comments
4. Public Comments: Public Comment is an opportunity for the public to participate in public meetings by addressing the Ventura County Continuum of Care Board in connection with one or more agenda or non-agenda items. This meeting is subject to the Public comments may be submitted by using one of the following options.

**Email in advance of the meeting:**

If you wish to make public comment on an agenda item via email, please submit your comment via email by 4:30pm on the day prior to the Board meeting. Send emails to: [venturacoc@ventura.org](mailto:venturacoc@ventura.org)  
Please indicate the agenda item you would like to speak on if relevant and whether you would like your message read by staff or you will be participating and would like to provide your comments during the live meeting.

**During the meeting:** Participants may use the chat function in zoom to indicate they would like to make a comment. Staff will call on participants during the public comment section of the meeting or during specific item following staff presentation of the item.

Continuum of Care Governance Board Business

5. Approval of Board Minutes from September 10, 2020.
6. Receive an Update on COVID19 Response from the County's Homeless Taskforce.
7. Receive an Update on FY20 HUD Continuum of Care Program Competition and 2021 Homeless Count.
8. Approval of Submission to Extend Continuum of Care Waivers as Approved on May 13, 2020 With Adopted Recordkeeping Requirements

9. Update on Emergency Solutions Grant for Coronavirus (ESG-CV) funding and authorization for CoC staff to submit an application for the second round to the California Housing & Community Development (HCD) no later than July 10, 2020.
10. Receive a Report on the 2020 Racial Disparities Assessment and Provide Input and Direction on Staff's Recommended Actions to Ensure Racial Equity in the Homeless Assistance and Housing Programs in the Ventura County Continuum of Care.
11. Receive a Presentation from Cathi Nye with the Ventura County Office of Education on Student Homelessness.



**Meeting Minutes  
Continuum of Care (CoC) Board  
Wednesday, September 9, 2020  
1:00pm-2:30pm**

Zoom Meeting  
Meeting ID: 875 9829 9838  
Passcode: 274148  
Phone: 1-669-900-6833

1. Call to Order: CoC Board Chair, Kevin Clerici, called the meeting to order at 1:02pm.  
Board Members: Carolyn Briggs, Kevin Clerici, Dawn Dyer, Susan Englund, Mara Malch, Pam Marshall, Manuel Minjares, Michael Nigh, Carmen Ramirez, Emilio Ramirez, Nancy Wharfield  
Staff: Tara Carruth, Jennifer Harkey, Christy Madden  
HMIS Staff: Alicia Morales, Marcy Snider  
Public Attendees: Mike Pettit, Rachel Wess, Ashley Humes, April Rosser, Mayra Tamayo, Susan White Wood, Ninna Castellanos, Cathi Nye, Amy Duganne
2. Board Comments: Drew Powers gave a shout out to Tara Carruth on the valiant attempt to acquiring a motel in the Thousand Oaks area for an East County HomeKey project. Manuel Minjares mentioned that the Many Mansions project in Fillmore is starting development next week for a total of 70 units. Dawn Dyer gave an update on the Housing Trust Fund being in the top tier and there is a chance of obtaining full funding.
3. CoC Staff Comments: Tara Carruth thanked the service providers for their work on the front lines and appreciates the support over the last six months. Jenn Harkey agreed with Tara's comments and expressed gratitude for being a part of this work to advocate for people in need.
4. Public Comments: No comments submitted.

Continuum of Care Governance Board Business

5. Approval of the minutes of the meeting of Governance Board held Wednesday, June 10, 2020. Motion by Carolyn Briggs, seconded by Dawn Dyer. All in favor.
6. Received an update on COVID19 Response from the County's Homeless Taskforce.  
CoC staff provided an update on the transition from the leasing of full motels in Project RoomKey to offering motel vouchers to homeless individuals who are highly vulnerable to COVID-19. There are 130 individuals using motel vouchers by using FEMA and COVID response funding until the end of the 2020 calendar year. Also, Ventura County Agency on Aging (VCAAA) is providing food and meals to those clients staying in the motels.

All of our shelter operators have done a great job with safe operations. We are working with our local jurisdictions about winter sheltering which typically take place in churches and have been volunteer run. We are looking into options for foul weather shelter in case of cold weather and/or a rain event.

Homelessness Prevention has been really needed during this pandemic and the Board of Supervisors provided some rental assistance and landlord support. CDC issued an eviction moratorium and we

need to continue to prevent homelessness. We are working with service providers to leverage resources when possible.

Shout out to United Way of Ventura County as they are continuing to support 40 veteran households and 6 of those households have transitioned to permanent housing. Also, the Landlord Engagement Program has been able to find housing for households since the beginning of the program.

The County Health Care Agency's Backpack Medicine team has continued to provide outreach and support to those living in encampments and recently partnered with the City of Oxnard. We have had fewer than 15 positive COVID-19 cases in our homeless population since the beginning.

Board members inquired about more rental assistance support and multi-family properties may have more challenges with the eviction moratorium. Also, Community Development Block Grant (CDBG) funding can be used to assist with rental assistance and it would be helpful to know which cities will be offering this type of support.

Drew Powers stated that the City of Thousand Oaks is offering rental assistance through discretionary funding.

Mike Pettit, Assistant County Executive Officer, stated that nearly \$11.4 million in pandemic rental assistance funding has been provided. The State legislature also postponed any evictions until the end of January 2021 and all past due rent will be turned into consumer debt and would prevent households from being evicted with that rent being owed. Also, the farmworker assistance program has been offering housing assistance as well.

Tara Carruth mentioned there is still pending legislation at the federal level that offers rent relief and support for landlords and property managers.

Susan Englund stated that United Way of Ventura County offers rental assistance which does not need to be tied to COVID-19.

Cathi Nye, Ventura County Office of Education Homeless Coordinator, asked about Family Unification Program (FUP) vouchers. Tara Carruth stated that the Housing Authority of San Buenaventura has FUP vouchers which are intended for former foster youth and those referrals must go through the County of Ventura Human Services Agency.

7. Received a report on Project HomeKey Application to Support Acquisition and Conversion of Oxnard Vanguard Inn to 70 Units of Permanent Supportive Housing.

Tara Carruth gave an overview of the Project HomeKey State funding that must be spent by the end of 2020. The Request for Qualifications (RFQ) process was completed and selected Mercy House and Community Development Partners as the developers. Many different motel properties were pursued and we were looking for properties that were in good condition to use the property as non-congregate shelter while working on the permanent conversion. The Oxnard Vagabond was the only motel that was readily available to pursue. We are looking at a 12 to 18 month interim phase to convert the project to Permanent Supportive Housing.

Emilio Ramirez, City of Oxnard Housing Director, is grateful for the amount of work the County and Community Development Partners put into this effort in a short amount of time. Many thanks to the staff who put that work in to make it happen. The funding includes State HomeKey and COVID response funding. We are looking at 70 units of Permanent Supportive Housing.

Carmen Ramirez thanked the staff who got this project underway. Some of the community did not have an opportunity to provide input on the project so we need to continue spreading the word about how good this project will be for the community.

8. Received a report on FY20 HUD Continuum of Care Program Competition and 2021 Homeless Count. CoC staff shared that our CoC NOFA is typically held in the summer but HUD tells us not to worry about the competition at this time. We have asked our legislative team to keep us apprised as the HEROES Act includes language to allow us to continue funding these programs without a full competition. We could still have a local competition in December but there would be a delay in providing funding to those programs that renew in January/February.

The annual unsheltered homeless count is required in every odd year (2021) so we all have concerns about being able to complete the count. It will require congressional approval to skip the unsheltered count. Our greatest concern is the ability to recruit hundreds of volunteers during a pandemic. If we do not have a 2021 count then we would be using our 2019 count for future funding. We just need to ensure that we do this safely.

Board members inquired about advocacy with our local representatives and if CoC staff could provide some talking points. Tara Carruth has been in communication with Brownley and Feinstein's offices so they are aware. Tara will provide talking points for the CoC Board.

9. Approved the cancellation of November 11, 2020 CoC Board Meeting in Observance of Veteran's Day. In observance of Veteran's Day, most government offices are closed. Staff do not anticipate any critical Board action will be needed in November and will communicate with the Board if the CoC NOFA or other critical action must be taken. Motion by Carmen Ramirez, seconded by Manuel Minjares. All in favor.

10. Received a report on California HEAP, HHAP and State ESG-CV funding and authorize staff to work with the CoC Data, Performance and Evaluation Committee, service providers and stakeholders on recommended priorities for upcoming funding opportunities.

CoC staff are working with service providers who have expended less than 40% at this time so it does not get returned to the State. Staff are currently participating in Technical Assistance on how to prioritize our COVID-19 investments and we are asking the CoC Board to authorize staff to work with stakeholders to develop priorities for the upcoming funding cycle.

Board member inquired about regional representation. Tara Carruth ensured the Board that staff will provide outreach geographically to include all jurisdictions.

Carmen Ramirez mentioned that the UCLA Latino & Politics Initiative will be conducting a webinar on emergency communications. Genevieve from MICOP is one of the speakers. Carmen will send out the announcement for those who are interested.

October 14, 2020

CoC Governance Board

**SUBJECT:** Receive an update on COVID19 Response from the County's Homeless Taskforce.

**BACKGROUND:** As the County of Ventura responds to the local emergency of the novel coronavirus (COVID-19) a Homeless Taskforce has been established to respond to the needs of the homeless community and keep stakeholders informed of local actions.

**DISCUSSION:** County of Ventura and Ventura County Continuum of Care are leading the regional Homeless Taskforce in response to COVID-19. The following actions have been taken to address the needs of the population and keep people experiencing homelessness safe as well as preventing a surge of homeless patients in the hospital system.

- Deployed 20 handwashing stations throughout the county near locations frequented by unsheltered homeless persons. Handwashing stations remain in place near service site and shelter locations. The County is working with all jurisdictions to determine which locations have a need for handwashing stations to remain in place as public restrooms reopen.
- Deployed handwashing stations to emergency shelters to promote good handwashing hygiene with shelter residents;
- Provide masks and other supplies to emergency shelters and service providers through County Office of Emergency Services and community donations;
- Worked to implement Public Health guidance for emergency shelters and safe operations.
- Established Backpack Medicine team as rapid response line to respond to encampments and other homeless community members to assess, screen and test persons when warranted;
- Provided motel vouchers as non-congregate shelter for healthy high-risk persons (65+ and/or those with serious health conditions) and those requiring isolation or quarantine due to symptoms or positive test results;
- Healthcare and hygiene services provided at County One Stop program locations;
- Provided funding to Community Action of Ventura County to open shower and laundry services;
- County Pandemic Rental Assistance Program provided rental assistance to eligible households;
- Created resource list of locations unsheltered persons make seek food assistance;
- Sharing information with stakeholders as situation and guidelines change;
- Procured solar chargers for unsheltered persons through Unite to Light in Santa Barbara;
- Continuous evaluation of unmet needs and future planning

## **Ongoing Planning Efforts**

### **Safe Delivery of Emergency Shelter and Winter Warming Shelter:**

Ventura County Public Health is partnering with emergency shelter programs to provide recommendations on safe congregate shelter operations in partnership with building and safety personnel. CoC/County staff are working with Ventura County jurisdictions on ways to deliver safe winter shelter in communities that typically host a seasonal shelter. In communities with rotating shelter locations at local churches, communities are evaluating alternative options to hold shelter in one location that can accommodate safe shelter following public health guidance. Staff is working with each jurisdiction to determine ability to offer winter or foul weather shelter through motel vouchers or other programs.

### **Homelessness Prevention:**

Preventing new episodes of homelessness during an economic downturn will be a critical with a service system that is already strained to serve the most vulnerable in Ventura County. Federal CARES funding may be allocated for this intervention but HUD has not yet released rules and requirements surrounding this funding. The County has allocated \$10 million in rental assistance funding for COVID-19 impacted households (loss of income or illness). Other sources of funding including the Emergency Food and Shelter Program will be made available for emergency assistance as well.

### **Non-Congregate Shelter/Motel Vouchers**

The County of Ventura continues to support 150 individuals with motel vouchers for safe non-congregate shelter. Individuals meet the FEMA established criteria for high-risk homeless populations of 65 age or older and/or those with medical diagnosis that put them at high-risk for COVID-19. The County is utilizing federal funding to support this service through December 2020. In addition to motel vouchers, the Ventura County Area Agency on Aging has partnered to provide delivered food and meals to motel voucher recipients in need. Prepared meals and food boxes will be delivered every 3 days to client's motel rooms to help meet nutrition needs.

### **Homeless Encampments Including RVs: and other Vehicles:**

The United States Centers for Disease Control (CDC) has issued guidance for serving homeless encampments including those in vehicles. This guidance states that persons should only be relocated if they can be provided shelter or housing in a non-congregate setting. Addressing the impacts of encampments on the larger community and the environment will require careful and thoughtful planning to leverage resources and create housing opportunities. CoC/County staff are working with stakeholders to provide services to individuals living in encampments and mitigating environmental and community impacts.

October 14, 2020

CoC Governance Board

**SUBJECT:** Receive a report on FY20 U.S. Housing and Urban Development Continuum of Care Program Competition and 2021 Point-In-Time Homeless Count.

**BACKGROUND:** The U.S. Housing and Urban Development (HUD) holds an annual funding competition for the Continuum of Care (CoC) program. As part of the regulatory requirements of the CoC Program, an annual competition is required to award new and renewal grant funding for homeless assistance. An additional regulatory requirement is the annual Point-in-Time Homeless Count where sheltered and unsheltered individuals are surveyed to demonstrate the number of individuals and families that are experiencing homelessness on one night in late January. These activities may experience some modifications as CoCs are working to address COVID-19 response in their respective communities.

**DISCUSSION:** Continuums of Care across the country are leading efforts to serve people experiencing homelessness during the COVID-19 pandemic. Staff at HUD have been reporting on weekly calls with CoC lead staff that they are advocating for an abbreviated CoC competition to reduce the administrative burden on CoCs and funded partner agencies. A modification to the annual competition requires legislative action. There are currently bills in the House and Senate to support COVID-19 relief which includes action to support the flexibility of a simple renewal process for CoC funding. This legislation is currently stalled and HUD staff has communicated that a competition may still happen later in the year depending on the outcome of this legislation.

The 2021 Point-In-Time Homeless Count is another regulatory requirement of the CoC program requiring an annual survey of individuals and families experiencing sheltered and unsheltered homelessness. HUD Staff are working on guidance for a safe process in anticipating COVID-19 risk will still be present in January. The sheltered count will be required in 2021 and efforts are underway to provide HUD guidance for safely conducting an unsheltered count. VC CoC staff anticipate challenges in recruiting volunteers to support this effort and have concerns that conducting a full survey or simple head count would be a challenging task for homeless service providers to support without assistance of volunteers. Staff are working closely with Dr. Joe Colletti from Urban Initiatives who assists with ensuring our PIT methodology is aligned with HUD requirements.

The Point-in-Time Count data has been utilized by the State for allocating funding for homeless assistance programs. Without updated data, the State may have to use data from previous years to

make funding allocations. Skipping a year or altering the methodology of this activity may also create challenges in using this data to support consistent messaging regarding the number of individuals and families experiencing homelessness in Ventura County, the State and the Country.

October 14, 2020

CoC Governance Board

**SUBJECT:** Approval of Submission to Extend Continuum of Care Waivers as Approved on May 13, 2020 With Adopted Recordkeeping Requirements.

**BACKGROUND:** On May 13, 2002, the Ventura County Continuum of Care Governance Board adopted recordkeeping requirements for Continuum of Care Waivers through the U.S. Department of Housing and Urban Development. Waivers are eligible to be extended through the end of 2020 by sending communication to the Los Angeles Field Office for Continuum of Care funded program.

On April 27, 2020 Ventura County Continuum of Care staff informed the HUD CPD Director of our intent to implement the waivers described below for the following CoC funded Projects:

- Ventura County Behavioral Health: Supportive Housing Program;
- Ventura County Human Services Agency: Choices Supportive Housing Program & Rapid Re-Housing Program;
- Lutheran Social Services Homeless to Home Rapid Re-Housing Program;
- Many Mansions Supportive Housing Programs;
- Turning Point Foundation Rapid Re-Housing, Supportive Housing and Safe Haven programs.

The waivers were approved effective April 29, 2020.

**DISCUSSION:** All Ventura County Continuum of Care funded programs are requesting to extend these waivers through the calendar year. Programs will continue to utilize the adopted recordkeeping requirements (Exhibit A) in accordance with HUD regulations and requirements.

**RECOMMENDATION:** Approval of Submission to Extend Continuum of Care Waivers as Approved on May 13, 2020 With Adopted Recordkeeping Requirements.

## Ventura County Continuum of Care Recordkeeping Standard Operating Procedures – COVID-19 Emergency Recordkeeping Protocol

In accordance with 24 CFR 578.103(a), we have established standard operating procedures that ensure that Continuum of Care program funds are used in accordance with the requirements of 24 CFR 578 and that sufficient records will be maintained to enable HUD to determine whether we, as a Recipient or Subrecipient, are meeting the requirements of this part.

As part of those policies and procedures, this Emergency Protocol outlines the waivers we have applied for related to the COVID-19 Health Emergency. It also describes the recordkeeping process we will use associated with each waiver requested.

**On April 27, 2020 we informed the HUD CPD Director of our intent to implement the waivers described below for the following CoC funded Projects:**

Ventura County Behavioral Health: Supportive Housing Program;  
 Ventura County Human Services Agency: Choices Supportive Housing Program & Rapid Re-Housing Program;  
 Lutheran Social Services Homeless to Home Rapid Re-Housing Program;  
 Many Mansions Supportive Housing Programs;  
 Turning Point Foundation Rapid Re-Housing, Supportive Housing and Safe Haven programs.

**The Waivers were approved effective April 29, 2020**

### Waivers Requested:

✓	Requirement	Applicability	Other Provisions
	<b>Fair Market Rent for Individual Units and Leasing Costs</b> 24 CFR 578.49(b)(2)	The FMR restriction is waived for any lease executed by a recipient or subrecipient to provide transitional or permanent supportive housing during the <b>6-month period beginning on the date of this memorandum.</b>	The affected recipient or subrecipient <b>must still ensure</b> that rent paid for individual units that are leased with CoC Program leasing dollars meet the rent reasonableness standard in 24 CFR 578.49(b)(2).
	<b>Disability Documentation for Permanent Supportive Housing (PSH)</b> 24 CFR 578.103(a) and 24 CFR 578.103(a)(4)(i)(B)	The requirement that intake staff-recorded observation of disability be confirmed and accompanied by other evidence no later than 45 days from the application for assistance documentation requirement is waived for any program participants admitted into PSH funded by the CoC Program for the <b>6-month period beginning on the date of this memorandum.</b>	For the purposes of individuals and families housed in PSH from the date of this memorandum until public health officials determine no additional special measures are necessary to prevent the spread of COVID-19, a written certification by the individual seeking assistance that they have a qualifying disability is considered acceptable documentation approved by HUD under 24 CFR 578.103(a)(4)(i)(B)(5).
	<b>Limit on Eligible Housing Search and Counseling Services</b> 24 CFR 578.53(e)(8)(ii)(B) and 578.53(d)	The limitation on eligible housing search and counseling activities is waived so that CoC Program funds may be used for up to 6 months of a program participant's utility arrears and up to 6 months of program	Only applies when those arrears make it difficult to obtain housing.

		participant's rent arrears, when those arrears make it difficult to obtain housing. This waiver is in effect <b>one-year beginning on the date of this memorandum.</b>	
	<b>Permanent Housing- Rapid Re-housing Monthly Case Management</b> 24 CFR 578.37(a)(1)(ii)(F)	This requirement in 24 CFR 578.37(a)(1)(ii)(F) that projects require program participants to meet with case managers not less than once per month is waived for all permanent housing- rapid re-housing projects for <b>two months beginning on the date of this memorandum.</b>	N/A
	<b>Housing Quality Standards (HQS) – Initial Physical Inspection of Unit</b> 24 CFR 578.75(b)(1)	This waiver of the requirement in 24 CFR 578.75(b)(1) that the recipient or subrecipient physically inspect each unit to assure that the unit meets HQS before providing assistance on behalf of a program participant is in effect for <b>6-months beginning on the date of this memorandum.</b>	Recipients and subrecipients <b>must</b> meet the following criteria: a. The recipient is able to visually inspect the unit using technology, such as video streaming, to ensure the unit meets HQS before any assistance is provided; and  b. The recipient or subrecipient has written policies to physically reinspect the unit within 3 months after the health officials determine special measures to prevent the spread of COVID-19 are no longer necessary.
	<b>HQS – Re-Inspection of Units</b> 24 CFR 578.75(b)(2)	This requirement in 24 CFR 578(b)(2) is waived for <b>1-year beginning on the date of this memorandum.</b>	N/A
	<b>One-Year Lease Requirement</b> 24 CFR 578.3, definition of permanent housing, 24 CFR 578.51(1)(1)	The one-year lease requirement is waived for <b>six-months beginning on the date of this memorandum.</b>	The initial lease term of all leases must be for more than one month.

**To maintain administrative records for the waived provisions, we will obtain the documentation described below, to the best of our ability given the public health emergency. In instances where we are unable to obtain the records outlined below, we will document all efforts taken to obtain them, which will serve as our administrative record.**

✓	Requirement	Suggested Recipient Documentation*	Suggested Client Level Documentation*
	<b>Fair Market Rent for Individual Units and Leasing Costs</b> 24 CFR 578.49(b)(2)	1) Documentation that FMR limits are impeding grantee's ability to find units for clients as a result of COVID-19; 2) Copy of waiver notification sent to HUD; 3) Emergency recordkeeping policies and procedures	1) A copy of the lease clearly displaying the date of execution; 2) a note to file noting the date of the COVID-19 Memorandum and its application to the client's lease; 3) a completed rent reasonableness analysis.
	<b>Disability Documentation for Permanent</b>	1) Documentation of COVID-19 related constraints preventing collection of disability	1) Copies of certifications; 2) a note in the files of affected clients outlining

	<b>Supportive Housing (PSH)</b> 24 CFR 578.103(a) and 24 CFR 578.103(a)(4)(i)(B)	documentation such as shelter-in-place orders or office closures; 2) Copy of waiver notification sent to HUD; 3) Emergency recordkeeping policies and procedures	application of the waiver and compliance with the timeframe.
	<b>Limit on Eligible Housing Search and Counseling Services</b> 24 CFR 578.53(e)(8)(ii)(B) and 578.53(d)	1) Emergency recordkeeping policies and procedures outlining how grantee will define “difficulty obtain[ing] housing”; 2) Copy of waiver notification sent to HUD	Documentation demonstrating the client’s inability to obtain housing as a direct result of rent and utility arrears.
	<b>Permanent Housing-Rapid Re-housing Monthly Case Management</b> 24 CFR 578.37(a)(1)(ii)(F)	1) Documentation of limited staff capacity, shelter-in-place order, or similar COVID-19 related impediment; 2) Copy of waiver notification sent to HUD; 3) Emergency recordkeeping policies and procedures	A note in the files of affected clients outlining application of the waiver.
	<b>Housing Quality Standards (HQS) – Initial Physical Inspection of Unit</b> 24 CFR 578.75(b)(1)	1) Emergency recordkeeping policies and procedures that outline the reinspection process; 2) Copy of waiver notification sent to HUD	1) A completed HQS inspection form noting the method of observation, date, and a reference to the waiver. 2) By the 3-month deadline, a completed on-site inspection.
	<b>HQS – Re-Inspection of Units</b> 24 CFR 578.75(b)(2)	1) Copy of waiver notification sent to HUD; 2) Emergency recordkeeping policies and procedures	A note in the files of affected clients.
	<b>One-Year Lease Requirement</b> <b>24 CFR 578.3, definition of permanent housing,</b> 24 CFR 578.51(l)(1)	1) Documentation outlining constraints related to 1-year lease requirement; 2) Copy of waiver notification sent to HUD; 3) Emergency recordkeeping policies and procedures	A notation in the files of affected clients along with a copy of the lease indicating the term.

*\*Documentation may be electronic.*

**Name & Title of Authorizing Official:**

**Signature:**

**Date:**

---



---

October 14, 2020

CoC Governance Board

**SUBJECT:** Update on Emergency Solutions Grant for Coronavirus (ESG-CV) funding and authorization for CoC staff to submit an application for the second round to the California Housing & Community Development (HCD) no later than October 21, 2020.

**DISCUSSION:** The California Department of Housing and Community Development (HCD) released a Notice of Funding Availability (NOFA) on October 2, 2020 for the second round of Emergency Solutions Grant for Coronavirus (ESG-CV) authorized by the federal Coronavirus Aid, Relief, and Economic Security (CARES) Act. The applications and all required documents are due to HCD by October 21, 2020. Based on this timeline, CoC staff will respond to the NOFA and hold a local competition following to distribute funding with input from the CoC Data, Performance and Evaluation Committee and final approval from the CoC Board.

ESG-CV funds may be used for the following eligible activities:

- Temporary emergency shelters (leasing of existing property or temporary structures) to prevent, prepare for and respond to COVID-19.
- Rapid Rehousing to assist households experiencing literal homelessness to move into housing or to stay in non-congregate shelter.
- Training on infectious disease prevention, mitigation and to provide hazard pay for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless.
- Address racial disproportionality in homeless populations and achieve equitable provision of services for those who are disproportionately impacted by homelessness and COVID-19.

HCD strongly encourages local communities to prioritize ESG-CV (Round 2) funding for Emergency Shelters and Rapid Rehousing in order to meet the immediate needs of literally homeless individuals, rather than homelessness prevention. The proposed funding allocation to be awarded to Ventura County in this second round of ESG-CV is \$730,000. CoC staff are currently advocating for more resources through this State NOFA, as the proposed distribution of funding across the counties is disproportionate and Ventura County has several priority gaps and needs, including additional non-congregate sheltering, rental assistance funding and shelter operations.

CoC staff have communicated with HCD staff via conference call and email shortly after the NOFA was released, to express our concerns about the method for allocating ESG-CV2. The proposed funding allocations were based on one email exchange with staff during the first round of ESG-CV which only

included the initial provider funding requests. This greatly differs from any other allocation with State ESG funds and the method was not detailed in the NOFA or the Frequently Asked Questions (FAQ) posted by HCD.

Based on our recent analysis of funding gaps through the COVID Investment Planning through HUD Technical Assistance, we have determined that our funding needs for ongoing non-congregate shelter, safe operations of emergency shelters and rapid rehousing to transition persons into permanent housing is approximately 5 million dollars. We have asked HCD to reconsider the proposed allocation to meet these needs in our community.

**RECOMMENDATIONS:**

Authorize CoC staff to submit the ESG-CV (Round 2) application to HCD by October 21, 2020 based on the priority needs of non-congregate shelter, emergency shelter operations and rapid rehousing activities.

**From:** [Carruth, Tara](#)  
**To:** [Amanda.Lockwood@hcd.ca.gov](mailto:Amanda.Lockwood@hcd.ca.gov); [megan.miller@hcd.ca.gov](mailto:megan.miller@hcd.ca.gov); [Michael.Phillips@hcd.ca.gov](mailto:Michael.Phillips@hcd.ca.gov)  
**Cc:** [Christy Madden \(Christy.Madden@ventura.org\)](mailto:Christy.Madden@ventura.org); [Harkey, Jennifer](#)  
**Subject:** Ventura County ESG-CV2 allocation  
**Date:** Thursday, October 8, 2020 10:45:00 AM  
**Importance:** High

---

Good Morning HCD Staff,

Thank you for taking the time to meet with us to discuss HCD's process for allocating funding for Round 2 of ESG-CV funds. As indicated in our discussion HCD staff had a singular email exchange with Jennifer Harkey of our team in August regarding the capacity for funding for ESG-CV. It was unclear that this one request from HCD staff was intended to determine what our funding needs were for Round 2 of ESG-CV2. In Jennifer's response, she was indicating needs related to our provider funding requests for ESG-CV1 and focused on that point in time. Jennifer's response did not include our countywide needs for non-congregate shelter/Project Roomkey and additional rapid-rehousing needs for an effective response to homelessness during COVID-19. Our staff participate in your weekly office hours calls and were not clear that the method for allocating ESG-CV2 was solely dependent on this one email exchange between HCD staff and County of Ventura staff. The method of allocating funds significantly differs from any allocation we have participated in with State ESG funds and is not detailed in the ESG-CV2 NOFA or in the FAQ section on HCD's webpage.

Ventura County has been working on COVID Investment Planning through HUD Technical Assistance and has determined that our funding needs for ongoing non-congregate shelter, safe operations of emergency shelters and rapid rehousing to transition persons into permanent housing is approximately 5 million dollars. Thus, we feel the award amount authorized in our AR should be approximately \$5 million and not \$730,000. We understand the pressure the State is under to spend these funds timely and can assure you that the County of Ventura and our Continuum of Care is confident in our ability to use these funds for State priorities and spend these funds by the expenditure deadline. We have demonstrated this through our history of spending funds timely and being flexible when HCD has requested us to draw down funds to meet the State's deadlines with HUD.

We are one of only a few counties, and the only one of our size, to be allocated under a million dollars in ESG-CV2. Santa Barbara and San Luis Obispo counties, for example, with smaller overall population received 5- \$6 million respectively. We are concerned that this method of allocating funds is not equitable and will significantly reduce the capacity of the County of Ventura and Ventura County Continuum of Care to continue our Project Roomkey efforts in providing non-congregate shelter and protect people experiencing homelessness from COVID-19. We would appreciate any reconsideration that HCD can make in evaluating these allocations and increasing the amount of funds made available to our community.

Sincerely,

Tara Carruth, MSW  
County of Ventura, County Executive Office  
Ventura County Continuum of Care

800 S. Victoria Ave. L#1940  
Ventura, CA 93009  
805-654-3838

October 14, 2020

CoC Governance Board

**SUBJECT:** Receive a Report on the 2020 Racial Disparities Assessment and Provide Input and Direction on Staff's Recommended Actions to Ensure Racial Equity in the Homeless Assistance and Housing Programs in the Ventura County Continuum of Care.

**BACKGROUND:** Historically our nation's response to homelessness has been missing a critical piece of including conversations and data analysis around racial equity. Across the country, people of color, specifically Black/African Americans and Native Americans are disproportionately impacted by homelessness. In the 2019 Annual Homeless Assessment Report (AHAR), Black/African Americans have remained considerably overrepresented among the homeless population compared to the U.S. population. African Americans accounted for 40 percent of all people experiencing homelessness in 2019 and 52 percent of people experiencing homelessness as members of families with children, despite being 13 percent of the U.S. population. In contrast, 48 percent of all people experiencing homelessness were white compared with 77 percent of the U.S. population. People identifying as Hispanic or Latino (who can be of any race) are about 22 percent of the homeless population but only 18 percent of the population overall.

In recent years, Federal and State partners have encouraged Continuums of Care to begin analyzing data to determine what racial disparities exist within communities and work collaboratively to ensure equal access to homeless assistance and housing programs for all persons experiencing homelessness.

HUD recently released the "Creating a Cultural Equity Plan: Organizational Policies and Procedures" (Exhibit A) resource guide which confirms the overrepresentation of specific racial and ethnic groups in the homeless population as well as the focus on racial disparities within the COVID-19 pandemic. HUD recommends a review of policies and procedures including a review of coordinated entry systems to ensure culturally responsive strategies are adopted, implemented and proper training is provided for all staff in the homeless services sector.

**DISCUSSION:** This report provides an overview of the Ventura County Continuum of Care (VC CoC) analysis of racial and ethnic disparities within the local homelessness system. The purpose of this assessment is to evaluate local data and develop strategies following to ensure equitable access to housing and homeless services. HUD continues to encourage communities to assess whether there are racial disparities in the provision of services or outcome of homeless assistance, and if present, demonstrate a plan to address such disparities. The assessment should include whether people of different races or ethnicities are more or less likely to receive homeless assistance.

The attached 2020 Racial Disparities Assessment includes demographic data collected the Ventura County Homeless Management Information System (VC HMIS), the 2020 Point-In-Time Homeless Count, the HUD Stella Performance Module / CoC Longitudinal System Analysis (LSA) data and local data from the American Community Survey. The attached summary includes an overview of the analysis to be included with our CoC application.

**RECOMMENDATIONS:** VC CoC staff recommend the following in response to the assessment results provided in the attached report:

- 1) Add training and education on the topic of racial and ethnic diversity for homeless service providers and organizations participating in the VC CoC.
- 2) Continue collecting data to evaluate CoC participating programs and determine which programs need to provide equal access and/or more accessible services.
- 3) Ensure the Pathways to Home Coordinated Entry System has access points that meet the needs of all populations and is equitable in prioritizing resources.
- 4) Conduct additional analysis on subpopulations experiencing homelessness to determine the housing needs among those subpopulations. Collaborate with local universities, such as California State University Channel Islands, to assist with this research.
- 5) Recruit persons with lived experience and work to diversify committee membership that reflect the racial and ethnic make-up of our community and solicit feedback on homeless services.
- 6) Increase access for those with limited English proficiency including building partnerships with agencies and organizations serving this population.

# Homeless System Response: Creating a Cultural Equity Plan: Organizational Policies and Procedures

Homelessness has had a disparate impact on communities of color and individuals identifying with marginalized populations for many years. Policies and procedures within agencies are a key resource in defining how agencies incorporate the values of diversity, equity, and inclusion throughout their core principles. A 2016 study, conducted by the Center for Social Innovation, confirms the dramatic over-representation of specific racial and ethnic groups in the homeless population. Specifically, Black people and Native Americans are the most disproportionately affected in [SPARC partner communities](#). Poverty alone does not explain the disproportionality: the percentage of people of color experiencing homelessness far outpaces their proportion of those living in deep poverty.

In 2020, COVID-19 has exacerbated the inequities for Black, Indigenous, and people of color and put them at further risk of homelessness and in need of assistance from the homeless services system at an even greater rate. Meeting the needs of these communities requires strengthening internal organizational policies and procedures to ensure racial equity to aid in overcoming these disparities. To help agencies review aspects of their own policies and procedures, and identify ways to build equity capacity, this tool outlines the following:

- **Key elements** of policies and procedures, and how they can create cultural equity within an agency;
- **A community example** of an organization that identified cultural racism, and how the new policy of cultural inclusion and procedures that outline how to make progress through diversity, equity, and inclusion standards created a process of change;
- **Next steps** an organization can plan through action steps; and
- Additional **resources** and links.

As centering racial equity is a continuous journey on multiple levels (personal, organizational, and communal), organizations are encouraged to use these practices as a starting point towards deeper discovery and dialogue.

## Key Elements of Policy and Procedures

Policies and procedures are key tools used within organizations to help guide institutional knowledge and policy. It is important to delineate the difference between policy and procedures, and how each can affect and change an organization's cultural equity.

A **policy** is a guiding principle used to set direction in an organization.

A **procedure** is a series of steps to be followed as a consistent and repetitive approach to accomplish a result. Procedures often outline staffing roles and provide guidance to employees, funders, and the communities they serve.

**Cultural equity** embodies the values, policies, and practices that ensure that all people—including but not limited to those who have been historically underrepresented based on race or ethnicity, age, disability, sexual orientation, gender, gender identity, socioeconomic status, geography, citizenship status, or religion—are represented in the development of

- agency policy;
- the support of staff and populations served;
- the nurturing of accessible, thriving venues for expression; and
- the fair distribution of programmatic, financial, and informational resources.

Policies and procedures should include how an organization ensures individuals being served receive the most culturally responsive resources and services they need. In order to reinforce this, the organization's policies and procedures must address and build on cultural equity capacity. Building equity capacity may require a review of your agency's policies and procedures. The chart below outlines key topics agencies that should be incorporated when reviewing and revising policies and procedures to ensure equity.

## Key Topic Areas for Review

**Data Collection and Review:** Understanding how to collect, review, and analyze external data regarding the populations and subpopulations your agency serves, including services provided and staff roles within your agency. Data collected can reflect overall effectiveness: e.g., whether staff, at all levels within your organization, is representative of the populations served. Review of hiring policies may lead to amendment of hiring procedures based on data collection.

**Cultural Recognition:** Review current agency policies for paid time off, focusing on paid holidays. Policies should allow flexibility for staff to acknowledge the holidays they recognize. Create a vehicle to understand which holidays staff would like to celebrate. Policies may allow for a certain number of paid “floating” holidays available for staff who recognize holidays other than federally recognized holidays.

**Equitable Professional Development:** Include policies that clearly outline what opportunities are available for staff to continue professional development or continuing education for personal growth. These policies should ensure that opportunities and funding for continuing education is equitable for staff at all levels within the organization. Procedures should provide details on how staff can access and gain support in leadership development and staff promotions.

**Staff Roles and Organization Representation:** Describe the process to review policies and practices concerned with who represents the organization at meetings with stakeholders, funders, and work committees. Include review and revision of the practice of directors and managers being the agency’s representative(s) at outside meetings. It is important to break down hierarchies and to focus on sending staff with the skill sets that best reflect the work being done in the space.

**Access to Agency Operations:** Describe how your agency distributes and provides equitable access to organizational information, such as agency budgets, information on program funding streams, projections and ideas for new funding sources, or ongoing resources the organization expects to secure. Create procedures that ensures upper management discusses and provides access to internal organizational documents.

**Mission Statement:** Review the current agency mission statement and determine whether it is reflective of how the agency currently operates. If the mission statement does not incorporate cultural equality or does not reflect the cultural equity the agency includes, the mission statement may need to be reviewed and/or changed.

## Community Example

### *Georgia Coalition Against Domestic Violence (GCADV)*

Domestic violence is an issue of social injustice, rooted in oppression. To end domestic violence, active steps must be taken at individual, local, regional, and statewide levels to end all forms of oppression. More specifically, domestic violence cannot end without addressing the oppression of Women of Color (WoC).

In 2010, GCADV recognized that this critical piece of anti-racist analysis was missing from its work, specifically the work of undoing and ending racism. When GCADV took a closer look at itself, it found that not only was this analysis missing, but as an organization, GCADV was contributing to the perpetuation of racism. These outcomes were highlighted through the organization’s audit, which included “exit” interviews with staff. The audit revealed WoC, primarily Black women, were leaving or being fired and cited racism as the key factor. Interviews also made aware the lack of engagement and lack of desire to engage with staff and survivors who identified as WoC. With the results of the internal evaluation, GCADV made strides toward undoing racism through an organizational shift that created new priority overall.

Some specific changes included:

- **Creating a policy to actively incorporate strategies for supporting WoC leadership into GCADV’s strategic plan:** strategies included policy around funding allocations to specific agency roles and practices around supporting survivors of color, both programmatically and financially.
- **Adapting policy on hiring practices to be more inclusive of WoC:** new procedures included ways that interviewers were not just in leadership roles and were more representative of client populations.
- **Developing a plan to hire, develop and retain WoC staff:** new policy and procedures focused around new hiring practices changes and budgeted funds for trainings on cultural equality.
- **Creating and distributing GCADV job announcements to reach WoC:** new procedure included posting job announcements in publications or on platforms frequently accessed by people of color.
- **Dedicating time monthly for aspiring White allies to learn, reflect, and examine the impact of their privilege:** new procedure included a standing meeting referred to as the “undoing racism meeting.”
- **Creating safe spaces for WOC voices to be heard, to receive professional opportunities, and heal from the emotional labor of experiencing intersectional oppression.** New procedure included creating space for

WOC to meet and coordinate on cultural issues, design, and materials; as well as creating procedures for how to develop opportunities for mentorship.

To learn more about GCADV, go to: <https://gcadv.org/racialjustice/>

## Next Steps

The first step in any racial equity work is acknowledgement that the work will be difficult, uncomfortable, and ongoing. Creating an equitable culture, and the policies and procedures to support the culture within an organization, takes time and effort. Organizations may take different approaches, and mistakes will be made along the way; however, if organizational staff can create space for honest, authentic conversations, progress can happen.

Organizations should create a workflow and plan to move forward on racial equity work. The plan should include common values and goals collectively decided upon and shared by all members of the organization, and may include a mission statement rooted in racial justice. The mission statement, values, and goals will likely help decide the next steps in the plan, to include new policies and procedures to carry out the new mission. As these will be created collaboratively, there can be a shared understanding that ensures everyone plays a part in determining what equitable outcomes will look like for your organization. Below are some basic ideas for next steps to take.

- **Organizational Change:** At the organizational or agency level, leaders and line staff can champion racial equity. Once policies are created to address organizational changes, procedures need to be implemented to support the new policies. Some strategies for new policies and procedures may include:
  - Train all staff working in the homeless services sector on understanding racism and the intersection of racism and homelessness, so they can target resources and develop or adapt programs for people of color.
  - Establish professional development opportunities to identify and invest in emerging leaders of color in the homelessness sector.
  - Create positions in organizations that are explicitly charged with creating equity-based responses to homelessness.
  - Create greater racial and ethnic diversity in boards of directors for local and national non-profit organizations working on homelessness.
- **Research:** The research and evaluation community working in the homelessness sector should embed an awareness of racial inequity into all of its work. Researchers should work to ensure they are not merely extracting knowledge from communities of color, but rather working in partnership with historically marginalized groups to establish new insights. Agencies can use this research to reflect on their own data and note key discrepancies or lack of racial equity.
- **Policy:** From a policy standpoint, solutions must be systemic, ambitious, and sustained. Such solutions require focused advocacy to shape political will and public support.
- **Trainings:** The racial equity journey is multifaceted, and individuals must engage in personal work parallel to organizational and community-level work. Staff surveys can ask what types of training would be most useful for the organization, and organizations can then follow up to create regular schedules for staff trainings for identified topics. Once trainings are decided, policies and procedures should be laid out for how and when training will be funded and available.

## Additional Resources

- **Building Cultural Equity Plan:** <https://www.policylink.org/our-work/community/arts-culture/plan>
- **Racial Equity Resource Guide:** <http://www.racialequityresourceguide.org/organizations/organizations>
- **Tools for Change:** <https://toolsforchange.org/resources/>
- **Definitions worksheet—"The Dynamic System of Power, Privilege, and Oppression":** <http://www.opensourceleadership.com/documents/DO%20Definitions.pdf>
- **Race—Power of an Illusion:** [http://www.pbs.org/race/000\\_General/000\\_00-Home.htm](http://www.pbs.org/race/000_General/000_00-Home.htm)

Organizations weaving equity into work:

- **Georgia Coalition Against Domestic Violence:** <https://gcadv.org/racialjustice/>
- **USICH—Leaders Working to Achieve Racial Equity and End Homelessness:** <https://www.usich.gov/news/these-leaders-are-working-to-achieve-racial-equity-and-end-homelessness/>
- **Local and Regional Government Alliance on Race and Equity:** <https://www.racialequityalliance.org/>

Organizations that train on equity and racial justice:

- **People’s Institute for Survival and Beyond:** <https://www.pisab.org/>
- **Women of Color Network Inc.:** <https://WoCninc.org/>
- **Training for Change:** <https://www.trainingforchange.org/>
- **Center for Equity and Inclusion:** <https://ceipdx.org/>

## 2020 Racial Disparities Assessment

The Ventura County Continuum of Care (VC CoC) strives to provide equitable access to housing and homeless service programs by monitoring outcomes, expanding outreach and developing more diverse partnerships within the community. This assessment includes an analysis of racial and ethnic disparities within the local homelessness system and recommendations on how we plan to address the results.

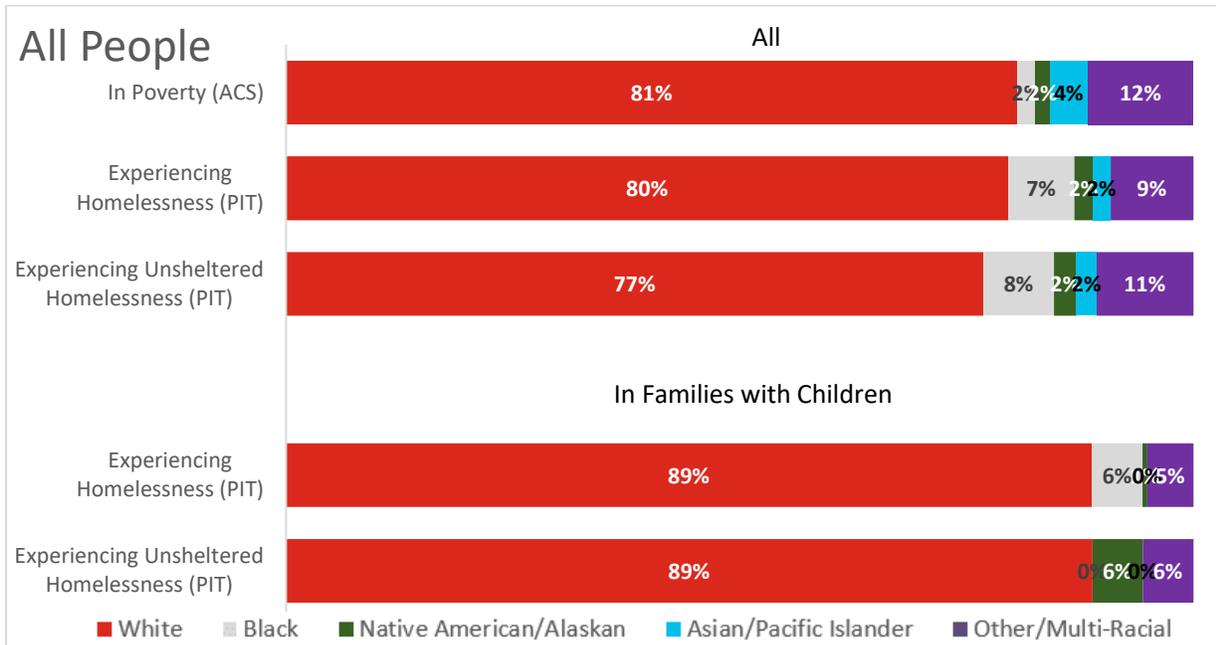
As of September 30, 2020, the Ventura County Homeless Management Information System (HMIS) data shows 4,486 people utilizing homeless services within our community. When we compare the demographic data in HMIS to the overall racial composition of the county, those who identify as Black or African American experience homelessness at a disproportionately higher rate. HMIS data shows 6.4% are Black or African American compared to 2% in the overall population. Data from the Point-In-Time (PIT) Homeless Count is consistent with this data, showing 7% of the homeless population being Black or African American (see tables 1 and 2). Also, those who identify as Asian or Pacific Islander are underrepresented by comparing the percentage of those living in poverty at 4% and only 2% reported experiencing homelessness (see table 1).

Table 1

Race and Ethnicity	All (ACS) <sup>1</sup>				In Poverty (ACS) <sup>1</sup>				Experiencing Homelessness (PIT) <sup>2</sup>			
	All		In Families with Children		All		In Families with Children		All		In Families with Children	
	#	%	#	%	#	%	#	%	#	%	#	%
<b>All People</b>	<b>847,834</b>		<b>378,727</b>		<b>85,816</b>		<b>45,682</b>		<b>1,669</b>		<b>197</b>	
<b>Race</b>												
White	677,010	80%	296,281	78%	69,177	81%	36,729	80%	1,329	80%	175	89%
Black	14,805	2%	5,648	1%	1,735	2%	816	2%	121	7%	11	6%
Native American /Alaskan	6,929	1%	3,771	1%	1,327	2%	1,374	3%	34	2%	1	1%
Asian/Pacific Isl.	62,644	7%	28,529	8%	3,613	4%	1,284	3%	33	2%	0	0%
Other/Multi-Racial	86,446	10%	44,498	12%	9,964	12%	5,479	12%	152	9%	10	5%
<b>Ethnicity</b>												
Hispanic	358,244	42%	210,141	55%	54,946	64%	37,853	83%	621	37%	125	63%
Non-Hispanic	489,590	58%	168,586	45%	30,870	36%	7,829	17%	1,048	63%	72	37%

Data Sources: 1) American Community Survey (ACS) 2013-2017 5-year estimate; 2) Ventura County Point In Time (PIT) Count

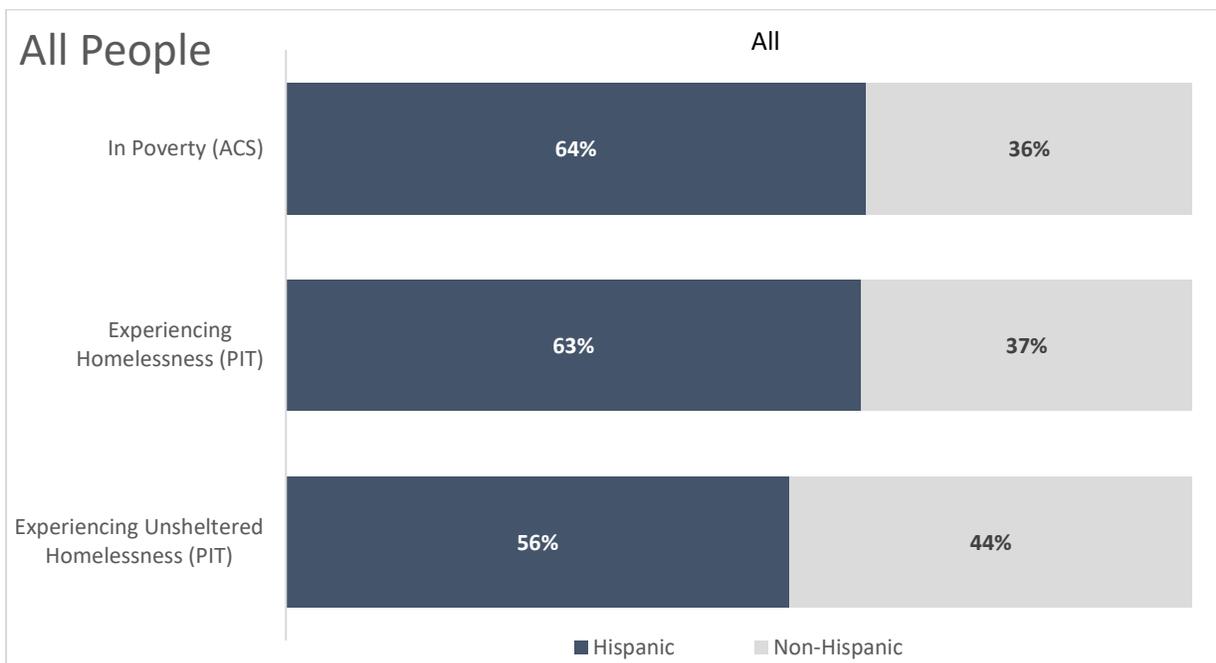
Table 2



Source: HUD CoC Analysis Tool

When evaluating ethnicity, people identifying as Hispanic or Latino are overrepresented in the PIT Count data, which shows 63% compared to 42% in the overall population. However, HMIS data reports 46% who identify as Hispanic or Latino experiencing homelessness and utilizing the system. This is closely aligned with the overall ethnic composition of the county. One area of concern is the number of Hispanic or Latino households living in poverty at 64% (see table 3). This is a population that likely needs more support with homelessness prevention and access to affordable housing.

Table 3



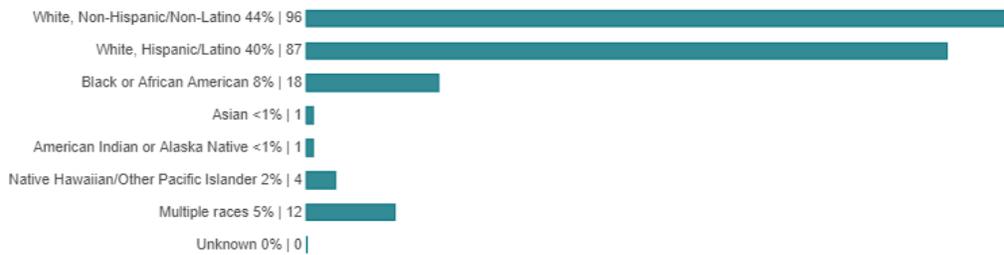
Source: HUD CoC Analysis Tool

A comparison of those who accessed Emergency Shelter (ES), Transitional Housing (TH) and Rapid Re-Housing (RRH) demonstrates an overrepresentation of Black or African Americans within the homeless services system (see tables 4 and 5). A lack of affordable housing continues to be a concern for low income households, resulting in the need for more shelters and homelessness resources.

Table 4 – Emergency Shelter and Transitional Housing

CoC Code: CA-611 Name: VC LSA 06.24.19 Report Period: 10/01/2017 - 09/30/2018 Submission Type: official

### Race and Ethnicity of HoH and Adults

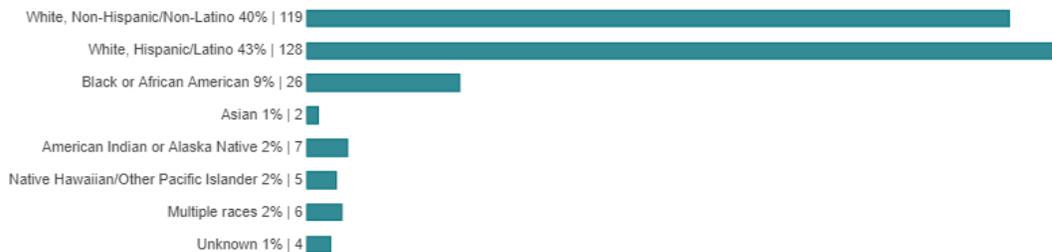


Source: Stella Performance Module / CoC Longitudinal System Analysis (LSA) Data

Table 5 – Rapid Re-Housing

CoC Code: CA-611 Name: VC LSA 06.24.19 Report Period: 10/01/2017 - 09/30/2018 Submission Type: official

### Race and Ethnicity of HoH and Adults



Source: Stella Performance Module / CoC Longitudinal System Analysis (LSA) Data

Based on the results of this analysis, the Ventura County Continuum of Care (VC CoC) recommends the following action items be addressed:

- 1) Add training and education on the topic of racial and ethnic diversity for homeless service providers and organizations participating in the VC CoC.
- 2) Continue collecting data to evaluate CoC funded projects and determine which programs need to provide equal access and/or more diverse services.
- 3) Conduct additional research on the different subpopulations experiencing homelessness to determine the housing needs among those subpopulations. Collaborate with local universities, such as California State University Channel Islands, to assist with this research.
- 4) Recruit persons with lived experience and work to diversity committee membership to reflect the make-up of our community and solicit feedback on homeless services.
- 5) Increase access for those with limited English proficiency including building partnerships with agencies and organizations serving this population.