Governance Committee
March 1st, 2017 3:00 PM – 4:30 PM
River Place, 2309 Euclid Ave, Room 1A (same as CoCB Board meetings)

Agenda

Welcome and introductions

Review the Governance Charter updates
  • Review comments from Omaha HUD Field office, attached
  • Youth Member

Open discussion
  • Meet again in May?

Adjourn: 4:30 PM
Good Afternoon Mark:

Several months ago you requested a review of the draft of a governance charter for the Des Moines/Polk County Continuum of Care. As we stated at the time, we will only provide comments and suggestions for the document. It is not considered a review or an approval of the document. It is the responsibility of the CoC to establish its charter in accordance with the regulations at 24 CFR Part 578. Please consult with legal counsel when finalizing the charter.

Below are comments/suggestions addressing items noted during our reading of the charter. The comments are organized to follow the order of the charter and page numbers are included for reference:

- On page 2, several membership categories are noted, however, under Membership Voting Rights, on page 3, there is no discussion of the voting rights of the various categories of membership.
- On page 4, the fourth bullet contains an error. The regulation cite should read “… 24 CFR Part ….”
- On page 4, the sixth bullet, it is not clear who ensures appointment of additional committees, subcommittees, or workgroups.
- On page 4, the ninth bullet needs some clarification. Currently there is no direct reporting mechanisms for the evaluations of outcomes by the CoC to HUD. You may want to consider revising this bullet to provide outcome evaluations to the City of Des Moines, the City of West Des Moines and the State of Iowa to include in their Consolidated Annual Performance and Evaluation Report (CAPER).
- On page 4, in the twelfth bullet, the CoC may consider adding a regulation cite for the Emergency Solutions Grant (ESG) Program at 24 CFR 576.
- On page 5 in the first bullet under Continuum of Care Planning, the CoC should consider including a reference to unaccompanied youth. The CoC may also want to include the information in 24 CFR 578.7 (c)(1)(i), (ii) & (iii)
- On page 5 in the fourth bullet under Continuum of Care Planning, the CoC may want to identify Des Moines, West Des Moines and the State of Iowa as jurisdictions requiring Consolidated Plan information from the CoC.
- At the bottom of page 5, in the Polk County Continuum of Care Board paragraph, it states that “The County Continuum of Care” designates the board; however, this group has not been identified in the document. We suggest that the CoC clearly identify how the board is designated.
- Though HUD does not prescribe the board selection process, 24 CFR 578.7(a)(3) does require CoCs to commit their selection process to writing. On page 6, it is recommended that the CoC amend the section of the Charter labeled “CoCB Directors” and describe not only where directors will come from, but also the method by which the CoC will choose the directors. Also, clarify that at least one director will be a homeless or formerly homeless individual (24 CFR 578.5(b)(2)).
- On page 7, under CoCB Responsibilities, it is recommended that the CoC consider adding language requiring the publication of agendas.
- On page 7, under the first bullet, it is recommended that the CoC consider adding language to include the minimums described in 24 CFR 578.7(c)(1)(i), (ii) and (iii).
- To ensure compliance with 24 CFR 578.9(a)(3)(I), the CoC should consider amending the second bullet on page 7. The City of Des Moines is currently the only applicant in the Des Moines/Polk County CoC. As the only applicant, the City would be the only agency eligible for planning funds.
• On Page 7, the CoC should consider revision to the ninth bullet. The regulations at 24 CFR 578.7(a)(2), require annual invitations for new members. The charter references the CoC board (CoCB) not general membership.

• On page 7, in the twelfth bullet, the CoC may want to consider adding language to note that these standards should be adopted in consultation with ESG recipients.

• On page 8, the CoC should consider revising the fourth bullet to include the State of Iowa as an ESG funding entity.

• On Page 9, Conflict of Interest, the CoC should consider revising the sentence “No Continuum of Care member or CoCB director may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the director is associated with...” to say “No Continuum of Care member or CoCB director may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member or director is associated with...”

• We recommend that the CoC further describe the Homeless Coordinating Council’s role. The charter should describe in more detail the oversight duties and the authority to override the CoC’s decisions regarding board membership.

• On Pages 12 thru 15, the charter establishes several standing committees. The CoC should consider describing how the committee members will be selected.

• On page 13, the seventh bullet, again there is no direct reporting mechanisms for the evaluations of outcomes by the CoC to HUD. You may want to consider revising this bullet to provide outcome evaluations to the City of Des Moines, the City of West Des Moines and the State of Iowa to include in their CAPER.

• On Page 14, the fifth bullet under Housing Committee, the CoC should consider revising this section to identify Des Moines, West Des Moines and the State of Iowa as jurisdictions requiring Consolidated Plan, Action Plan and CAPER Information from the CoC.

• On page 16, the last three bullets under Collaborative Applicant Responsibilities, the CoC should consider revising these bullets as it seems to dictate the City’s responsibility for the administration of the ESG program. The language may need to be revised to determine responsibilities in consultation with the City.

Should you have any questions, please contact Ms. Kim Radice, CPD Representative, at 402-492-3190.

Thank you.

Tim Severin
Director, Community Planning
and Development Division
Omaha Field Office
Phone: 402.492.3145