Public Comment Notice

FFY2024 Goals and Action Steps

for ESG

The State of Georgia Department of Community Affairs (DCA) is currently preparing its FFY2024/SFY2025 Annual Action Plan for the 2023-2027 Consolidated Plan for the State fiscal year beginning July 1, 2024. The application submission periods for the Emergency Solutions Grants (ESG) Program will begin in April 2024.

As a result, DCA has prepared a draft of the FFY2024 action steps for each project along with other project specific requirements including the proposed methods of funding distribution and the project priorities for funding. Comments regarding these and other issues will be accepted for a 30-day period for review and consideration prior to the beginning of these application submission periods.

The State encourages citizens and other interested parties to review the draft document and to submit their written comments no later than **February 29, 2024 at 5:00 PM**. All written comments should be emailed to LaDrina.Jones@dca.ga.gov or mailed to:

FFY2024 ESG Method of Distribution Georgia Department of Community Affairs Office of Homeless and Special Needs Housing Attn: LaDrina M. Jones 60 Executive Park South NE Atlanta, GA 30329-2231

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Georgia Department of Community Affairs (DCA) Proposed Federal FY2024/ State FY2025 Goals and Action Steps for the Emergency Solutions Grants

EMERGENCY SOLUTIONS GRANTS PROGRAM (ESG)

The Georgia Housing and Finance Authority (GHFA) is the recipient of the State's ESG allocation from the U.S. Department of Housing and Urban Development (HUD). GHFA contracts with DCA to administer the ESG program for the State of Georgia.

Purpose

The HEARTH Act and resulting ESG Interim regulation (ESG Interim Rule) renamed and significantly modified the Emergency Solutions Grants (HUD ESG) program. The revised program maintains support for a crisis response system through emergency shelters but places an emphasis on identifying and preventing homelessness and returning those who experience homelessness back into the community as quickly as possible.

Federal ESG Regulations

This program design is based upon an analysis of the McKinney-Vento Homeless Assistance Act, as amended by S. 896 the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 and the ESG Interim Rule. Interim regulations went into effect in January 2012. As a result, actual implementation of this program may further be defined by final regulations, HUD's interpretations of these regulations, as well as other directives or guidance issued by HUD later.

Eligible Service Areas

Congress has authorized the State of Georgia, through the Georgia Housing and Finance Authority (GHFA) and Department of Community Affairs (DCA) to use HUD McKinney Act (modified through the HEARTH Act) ESG funds to primarily serve 151 of Georgia's 159 counties. The eight (8) excluded counties are Augusta-Richmond, Macon-Bibb, Savannah-Chatham, Clayton, Cobb, DeKalb, Fulton, and Gwinnett. These Entitlements receive ESG funds directly from HUD. To the maximum extent practicable, as determined by DCA, HUD ESG funds will be expended for programs to serve the State of Georgia's ESG Non-Entitlement.

In addition to the HUD ESG program, DCA will develop and implement an expanded ESG program utilizing funds made available through Georgia's State Housing Trust Fund for the Homeless Commission (HTF). This HTF ESG program will substantially mirror and compliment the HUD ESG program, except that eligible activities will be expanded to include hotel/motel vouchers, supportive services, and others defined herein. Further, HTF ESG funds are not prioritized to service providers operating in the State of Georgia ESG Non-Entitlement but are available to sub-grantees across the state. Priorities for this funding are listed in Part F of this document.

HUD ESG Eligible Activities

Activities eligible using HUD ESG funds include:

(1) Emergency Shelter - maintenance, operation, insurance, provision of utilities, and provision of furnishings related to emergency shelter.

(a) Essential Services - the provision of essential services related to emergency shelter or street outreach, including services concerned with employment, health, education, family support services for homeless youth, substance abuse services, victim services, or mental health services.

(2) Rental Assistance – the provision of tenant-based, short-term or medium-term payments for rents and/or utilities and other services directed towards securing permanent housing as designated by HUD. Beneficiaries may include homeless individuals or families (rapid re-housing), or individuals or families at risk of homelessness (homelessness prevention).

(a) Stabilization Services – associated with rental assistance, to include housing search, mediation or outreach to property owners, legal services, credit repair, providing security or utility deposits, utility payments, rental assistance for a final month at a location, assistance with moving costs, or other activities that are effective at:

(i) stabilizing individuals and families in their current housing (homelessness prevention); or

(ii) quickly moving such individuals and families to other permanent housing (rapid re-housing).

- (3) HMIS to pay the costs of contributing data to the HMIS in support of the efforts of an emergency shelter, permanent housing program, or centralized assessment hub. Eligible costs include data entry, obtaining HMIS technical assistance and training, reporting, monitoring, and reviewing data quality. These funds are reserved for Balance of State Continuum of Care or Georgia ESG Non-Entitlement areas for ESG programs with large implementations; those serving a high volume of clients or programs with particularly demanding HMIS requirements.
- (4) Street Outreach funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Eligible costs include engagement, case management, emergency health services, emergency mental health services, transportation, and services for special populations.

HTF ESG Eligible Activities

In addition to the HUD ESG Eligible Activities named in the preceding section, HTF ESG Eligibility Activities may also include:

(1) Hotel/Motel Vouchers – to be used (a) in the absence of shelter (b) in the absence of adequate or appropriate shelter based upon documented needs, particularly in areas where rapid re-housing and street outreach programs exist or (c) as temporary placement for individuals who have been

through the Coordinated Assessment process when emergency shelter beds are at capacity. Programs awarded with this funding must have a direct connection to a rapid re-housing or other program making placements into permanent housing.

- (2) Supportive Services the provision of essential services, limited to transportation, childcare, and case management. These programs must be directly connected to programs moving clients into permanent housing.
- (3) Training for Sub-grantees funding to provide ESG recipient agencies with opportunities for technical assistance and training related to the administration of the grant. Training may include sessions conducted by DCA staff or external subject matter experts.
- (4) Coordinated Entry costs defined by DCA associated with implementation of a Coordinated Entry system, as required by the HEARTH Act, in areas without other local resources for such costs

Funding Priorities

Priorities for Federal ESG funds for Federal Fiscal Year (FFY) 2024 are rapid re-housing and homeless prevention (rental assistance and stabilization services), emergency shelter (operations and essential services), street outreach, and Homeless Management Information System (HMIS) data entry activities associated with Coordinated Entry. DCA reserves the right to emphasize funding for Georgia ESG Non-Entitlement communities.

Priorities for State Housing Trust Fund (HTF) dollars are hotel/motel vouchers and supportive services,

Definition of "Homeless" Individual or Family

- (1) A "homeless" individual or family is generally defined as follows:
 - a. an individual or family who lacks a fixed, regular, and adequate nighttime residence;
 - b. an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - c. a *homeless, as defined above,* individual or family *immediately thereafter* living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations, and congregate shelters);
 - d. an individual who resided in a shelter or place not meant for human habitation *[see a. and b. above]* and who is exiting an institution where he or she ... resided *less than 90-days*;
 - e. an individual or family who-
 - (i) will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations, as evidenced by:
 - (ii) a court order resulting from an eviction action that notifies the individual or family that they must leave within 14 days;

- (iii) the individual or family having a primary nighttime residence that is a room in a hotel or motel and where they lack the resources necessary to reside there for more than 14 days; or
- (iv) credible evidence indicating that the owner or renter of the housing will not allow the individual or family to stay for more than 14 days, and any oral statement from an individual or family seeking homeless assistance that is found to be credible shall be considered credible evidence for purposes of this clause;
- (v) has no subsequent residence identified; and lacks the resources or support networks needed to obtain other permanent housing; and unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statutes who—
 - (A) have experienced a long-term period without living independently in permanent housing,
 - (B) have experienced persistent instability as measured by frequent moves over such period, and
 - (C) can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse, the presence of a child or youth with a disability, or multiple barriers to employment.
- (2) Notwithstanding any other provision of this section, any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions in the individual's or family's current housing situation, including where the health and safety of children are jeopardized, and who have no other residence and lack the resources or support networks to obtain other permanent housing.
- (3) Exclusion Eligible persons do not include any individual imprisoned or otherwise detained pursuant to an Act of the Congress or a State law.

Definition of "At Risk" Individual or Family

An "at risk" individual or family is generally defined as follows:

- (1) has a *family* income below 30 percent of median income for the geographic area;
- (2) has insufficient resources immediately available to attain housing stability; and
- (3) meets one or more of the following criteria:
 - (i) has moved frequently because of economic reasons;
 - (ii) is living in the home of another because of economic hardship;
 - (iii) has been notified that their right to occupy their current housing or living situation will be terminated;
 - (iv) lives in a hotel or motel;
 - (v) lives in severely overcrowded housing;
 - (vi) is exiting an institution; or
 - (vii) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

Such term includes all families with children and youth defined as "homeless" under other Federal statutes.

Definition of "Chronically Homeless" Individual or Family

(1) The term `chronically homeless' means a homeless individual with a disability who:

- i lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- ii has been homeless and living as described in paragraph (1)(i) for at least 12 months OR on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions is at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12 month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;
- (2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility for fewer than 90 days and met all of the criteria in paragraph (1) before entering that facility;
- (3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Definition of "Homeless Individual with a Disability"

The term `homeless individual with a disability' means an individual who is "homeless," as otherwise defined herein, and has a disability that meets all four of the following criteria:

- (1) is expected to be long-continuing or of indefinite duration;
- (2) substantially impedes the individual's ability to live independently;
- (3) could be improved by the provision of more suitable housing conditions; and
- (4) is either
 - (A) a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury; OR
 - (B) a developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002); OR
 - (C) the disease of acquired immunodeficiency syndrome (AIDS) or any condition arising from the etiologic agency for acquired immunodeficiency syndrome.

PROCESS FOR MAKING SUB-AWARDS

Method of Distribution

As a threshold consideration, all applicants must demonstrate how their housing or service projects directly serve persons who are homeless as defined by HUD and demonstrate how the housing and services provided will improve housing stability for those persons. Applicants must describe homeless verification methods, and how they will track outputs and outcomes (stable housing) for persons served.

Both HUD-funded and State Housing Trust Fund for the Homeless (HTF)-funded ESG funds are available to community and faith-based organizations holding a 501(c)3, quasi-governmental agencies like Community Service Boards, and local government entities. Agencies must be collaborating with local mainstream service providers and local provider groups that are dedicated to housing and service interventions that serve persons experiencing homelessness. Agencies must also participate in HUD-mandated Continuum of Care planning appropriate to the jurisdiction where their activities are located.

Funding decisions will be based on several factors, including but not limited to, those stated below in the "Rating and Selection" section. DCA reserves the right to fund any project application, regardless of score and/or ranking, if such project is determined to directly address DCA priorities including, but not limited to, geographic distribution of funds and furthering a systemic response to homelessness.

Thresholds for project consideration generally include the eligibility of the described population to be served; the eligibility of described activities; minimum criteria for organizational capacity, community or service area need; a two-year operating and financial history, including a completed IRS Form 990, if applicable; past or projected project performance; responsiveness to timeliness and information requested; HMIS performance; as well as other relevant factors, as determined by DCA. Threshold considerations may also include any of the "Rating and Selection" criteria named in the section below.

DCA reserves the right to distribute ESG and HTF funds outside of the annual competition process when funds are available. Funds may be distributed in this manner to supplement existing programs demonstrating high performance, for specific geographically defined Coordinated Entry efforts, for prioritized homeless services efforts, or for any other eligible activities determined by DCA to further local systemic responses to homelessness.

Matching Requirements

All applicants are expected to provide at least a 100% match for HUD funds consisting of documented non-McKinney resources. Match may include the value of any lease on a building, any salary paid to staff to carry out the program, and the value of the time and services contributed by volunteers to carry out the program at a rate determined by DCA. DCA reserves the right to decrease the required match percentage for sub-grantees providing high priority services in areas with demonstrated need for such services. Exceptions may be considered by DCA on a case-by-case basis.

Deadlines and Award Authority

Application documents will be available on or about March 11, 2024. The application process will be announced on DCA website. Funding announcements will be made on or about August 19, 2024. The Commissioner of DCA or staff designated by the Commissioner shall have the authority to make awards from funds allocated by HUD or reserved by the HTF Commission. Awards are made at the sole discretion of DCA.

Application Notice and Submission Requirements

DCA will solicit information about application submission and application development workshops by email from every person on the "contacts" mailing list associated with its homeless projects. Notices will also be emailed to local government representatives, local Continuums of Care, regional commissions, DCA Office of Regional Services, and other groups with local and regional interests. Notice will be published on the DCA website, and all persons receiving notice will be asked to share the notice with others within the state, their region, or their community with an interest. Application development workshops will be held in-person.

Rating and Selection

A competition for funds will be implemented that will include, but not be limited to, the threshold criteria named in the "Method of Distribution" section, as well as other considerations such as project location related to demonstrated need, participation in collaborative networks and planning processes, and cost benefit analysis and recidivism rates for currently funded projects, etc. Lower scoring applications may not be funded.

General funding decisions for all agencies will be based upon:

- Geographical location;
- Past performance (outputs/outcomes);
- Past performance with DCA agreements, DCA ESG policies and rules, Federal/state/local laws, regulations, policies;
- Compliance and past performance with Georgia Homeless Management Information System (HMIS) requirements. Family violence agencies must demonstrate performance through the HMIS comparable database designated by DCA;
- Need based on data presented in the application, the local Homeless Point in Time (PIT) count, and any other relevant data, as determined by DCA;
- Project strategy;
- Organizational structure, operating processes, and capacity;
- The extent to which the organization operates under the authority of a diversified, involved, volunteer, community-based board of directors;
- Professional management;
- The consistency of the organization's identity or its mission to the provision of homeless services;
- The consistency to which the organization utilizes networks and partnerships within the community to avoid duplication of housing and services;
- Participation in meetings and other activities of the appropriate local Continuums of Care;
- Direct cash match provided for ESG activities;
- The value of other non-cash contributions;
- The priorities established by the local Continuum of Care;
- Sound operating procedures, accounting policy and controls;
- Organizational and financial policy, stability, and capacity; and,
- Location in an ESG entitlement jurisdiction which receives federal ESG funds directly from HUD. These jurisdictions include: City of Atlanta, Augusta-Richmond County, Macon-Bibb County, City of Savannah, Clayton County, Cobb County, DeKalb County, Fulton County, and Gwinnett County;
- Participation in local Coordinated Entry efforts;
- Ensure no person is denied access to a program because that person has been a victim of domestic violence, dating violence, sexual assault, and/or stalking.
- For Emergency Shelter Projects, bed utilization rate and enrollment dates in HMIS and DV Comparable Database.

DCA staff will use a points system during application review to ensure that the limited pool of funding received is used in the most effective way possible. Individual scores by project may be assessed for

completeness of the application; past performance relevant to the project type; implementation strategy (narrative describing need, clients served, local coordination, goals, outputs, outcomes, etc.); procurement of outside resources; the extent to which projects result in increased housing stability for clients; organizational development and experience; budgeting and financial reporting; efficient and effective use of HMIS; adherence to DCA Housing Support Standards (HSS), and other relevant factors. Applicants requesting funds for multiple projects may receive funds for some, but may not for all, projects.

DCA reserves the right to fund any project application, regardless of score and/or ranking, if such project is determined to directly address DCA priorities including, but not limited to, geographic distribution of funds and furthering a systemic response to homelessness.

In addition to all other federal, state, and local laws and regulations, all activities must be implemented in full compliance with pertinent HUD ESG Program regulations published at 24 CFR §576.

Local Approval and Certification of Consistency with Consolidated Plans

In accordance with Federal law governing the ESG program, all nonprofit applicants for emergency shelter projects must obtain approval(s) from appropriate local government jurisdictions. All approvals must be made in formats prescribed by DCA. Documentation of approval, or at a minimum the initiation of the approval process, must be included in the application. Applications from nonprofits for projects that do not adequately address local approval may be rejected for threshold considerations.

Collaboration

Applicants must participate in Continuums of Care (CoC) appropriate to their project(s). There are nine CoCs in Georgia. Applicants must also participate in coordinated intake/assessment, referral, and case management systems established by the local CoC(s) within their service area in order to provide, in conjunction with other providers, appropriate housing and supportive services to better enable homeless persons to achieve success and end their homelessness. The expectation is that each sub-grantee or its community partner: a) assesses consumer needs and barriers to housing stability; b) seeks the prevention of homelessness for non-homeless consumers, c) works to move homeless individuals into rapid rehousing, permanent supportive housing, or other affordable housing appropriate to the needs of the consumer; d) documents and tracks referrals to housing and service providers; and e) tracks participant progress and outcomes, including post-discharge follow up contacts recorded in HMIS. Organizations will be required to document these efforts through DCA's HMIS implementation in partnership with Eccovia Solutions. Family violence agencies may not participate in HMIS, but instead, must document these efforts through the Domestic Violence Comparable Database. Sub-grantees must also adhere to DCA's published Housing Support Standards (HSS). Information regarding these Standards and how to implement them can be found on the DCA website at the following link:

https://www.dca.ga.gov/sites/default/files/georgia_bos_coc_written_standards - approved_5-5-23_final_1.pdf

Coordinated Entry

All sub-grantees are required by the ESG Interim Rule to participate in the Coordinated Entry system for the local Continuum of Care, as defined by the HEARTH Act. In areas where Coordinated Entry is still

under development, sub-grantees are expected to actively participate in system development. Further requirements for participation, as determined by DCA, may be outlined in contracts for sub-grantees. Additionally, DCA may, at its discretion, define higher levels of required participation in Coordinated Entry for ESG sub-grantees.

Minimum Compliance Criteria

Agencies must provide required certifications and provide all supporting documentation requested by DCA during the application deadline. Each agency must demonstrate to the satisfaction of DCA that it complies with Federal, State, and local laws and regulations, and that it can carry out applicable programs. All returning sub-grantees must be in substantial compliance with existing DCA agreements. DCA reserves the right to sanction individuals and organizations with a history of non-compliance.

Funding Guidelines

Subject to final federal and state appropriations, approximately \$4 million dollars is expected to be available for projects funded under the HUD ESG program. DCA will reserve a minimum of 75% of Federal funding to be spent within the Georgia ESG Entitlement area.

The following amounts have been established as guidance for funding requests. All the "Rating and Selection" factors, including distribution by "Eligible Service Area" will be considered in evaluating funding requests. DCA will make minimum grant awards of \$30,000 for Street Outreach, Rapid Re-Housing and Homeless Prevention.

Maximum grant amounts are as follows:

- Emergency Shelter \$70,000 per project
- Street Outreach \$50,000
- Rapid Re-Housing No maximum limit
- Homeless Prevention No maximum limit
- Supportive Services \$30,000
- Hotel/Motel Vouchers \$20,000
- HMIS \$40,000

DCA reserves the right to establish maximum amounts for new applicants and returning agencies with a history of underspending.

Monitoring

In accordance with program regulations, all ESG sub-grantees will have an on-site or remote review of their homeless housing and/or service program(s). Program monitoring is an ongoing process of reviewing a sub-grantee's performance in meeting goals, identifying program deficiencies, and enhancing management capacity through technical assistance or other corrective actions.

DCA will review the performance of each sub-grantee in carrying out its responsibilities whenever determined necessary. In conducting performance reviews, DCA will obtain financial and programmatic information from the sub-grantee's records and reports and, when appropriate, its sub-recipients, as well

as information from onsite monitoring and electronic data sources, including HMIS. Where applicable, DCA may also consider relevant information pertaining to the recipient's performance gained from other sources, including the application for funding, reimbursement requests, audits, and annual reports. Reviews to determine compliance with specific requirements of the ESG program will be conducted as necessary, with prior notice to the sub-grantee.

If DCA determines that the sub-grantee, or one of its sub-recipients, has not complied with an ESG program requirement, DCA will give the sub-grantee notice of this determination and an opportunity to demonstrate, within the time prescribed by DCA and based on substantial facts and data that the sub-grantee has complied with ESG requirements.

Remedial actions and sanctions for a failure to meet an ESG program requirement will be designed to prevent a continuation of the deficiency; mitigate, to the extent possible, its adverse effects or consequences; and prevent its recurrence. If the sub-grantee fails to demonstrate to DCA's satisfaction that the activities were carried out in compliance with ESG program requirements, DCA will take one or more of the remedial actions or sanctions.

Required Written Standards

DCA requires that each sub-grantee establish and consistently apply policies and procedures for each ESG project according to the minimum standards set by HUD and the specific standards established by the local Continuum of Care in which the project exists. If a CoC has formally established written standards, all projects are expected to meet those standards.

The DCA ESG program has adopted the Balance of State Continuum of Care Written Standards for all projects located in that geographic area. Projects located in CoCs other than the Balance of State must still use the Balance of State Written Standards to set minimum program standards and must also observe any local Continuum of Care written standards that are more stringent than those for the Balance of State.

Information regarding these Standards and how to implement them can be found on the DCA website at the following link:

BoS CoC Written Standards | Georgia Department of Community Affairs (ga.gov)

DESCRIPTION OF COC

The Georgia Balance of State Continuum of Care (BoS CoC) is made up of 152 counties, both urban and rural. Jurisdictions in Georgia outside of the Georgia BoS CoC include: Athens-Clarke County, City of Atlanta, Augusta-Richmond County, Cobb County, Columbus-Muscogee County, DeKalb County, Fulton County, and City of Savannah. All other jurisdictions are included within the BoS CoC.

The collaborative applicant for the BoS CoC is the Department of Community Affairs. The collaborative applicant has an established Governance Charter and is establishing a coordinated assessment system to enable homeless households to access the best fit intervention available. This has been implemented.

CONSULTATION WITH COC

Allocation of ESG funds each year

The Georgia Non-Entitlement staff hosts annual discussions with the Continuums of Care (CoCs) concerning the needs of each Continuum. The Continuums are asked to rank the eligible activities according to their local need and submit these to the Georgia Non-Entitlement. This local priority ranking is reflected in the Georgia Non-Entitlement's scoring of applications and award recommendations.

In addition, Georgia Non-Entitlement stakeholders - such as the CoC leads, local government officials and non-profit organizations serving the homeless - will meet with Non-Entitlement staff to review the Non-Entitlement's vision and plans for the forthcoming year.

Developing funding, policies, and procedures for the operation and administration of the HMIS

The Georgia HMIS Implementation is a regional collaborative effort to implement HMIS across eight of the nine Georgia Continuums of Care. The Georgia Housing and Finance Authority (GHFA) serves as the Lead Agency for the Georgia HMIS Implementation that has designated DCA to administer the homeless assistance programs.

The governing body for the GA HMIS Implementation is the GA HMIS Steering Committee. This Committee is made up of representatives from each of the eight Continuums of Care and the DCA HMIS Project Manager. The role of this committee is to oversee the HMIS implementation and ensure compliance with the HUD CoC Program Interim Rule 578.51.

As the administrative agent of the HMIS Lead Agency, DCA is responsible for soliciting feedback from agencies and stakeholders and communicating that feedback to the Steering Committee.

The funding for HMIS includes a Data Quality Analyst specifically focused on identifying, training, and improving data quality for programs for funded CoC Programs including the DCA ESG program. This funding and these efforts have been integral in providing a baseline for evaluation of the ESG project.