# **DuPage County Continuum of Care Governance Charter**

Adopted by the Leadership Committee of the Continuum of Care on December 12, 2012 Reviewed and Updated December 10, 2025

#### Establishment of the Continuum of Care

- 1. The DuPage County Homeless Continuum of Care (CoC) had been established in accordance with Bylaws adopted on April 24, 2009, as shown in Exhibit A. An amendment to the Bylaws on November 18, 2016 created the DuPage County Continuum of Care (CoC) name change. An amendment to the Bylaws on November 20, 2020 updated and expanded the DuPage County CoC Committee structure. An amendment to the Bylaws on November 4, 2022 amended the name of the PACE Committee to "Public Awareness and Community Engagement" Committee. An amendment to the Bylaws on November 21, 2025 included the establishment of the Lived Experience Advisory Committee as described in the Bylaws herein.
- 2. The DuPage County CoC consists of representatives from relevant organizations within DuPage County, Illinois. Such relevant organizations include nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement and organizations that serve veterans and individuals with current or former lived experience of homelessness. Relevant organizations within the Chicago Metropolitan area work alongside and in collaboration with the DuPage County CoC as problems, issues, and solutions do not stop or start at the DuPage County borders. Current members of the DuPage County CoC are shown in Exhibit B.
- 3. The DuPage County CoC has established a Leadership Committee to act on behalf of the DuPage County CoC as its board. The Leadership Committee is representative of the relevant organizations and of projects serving subpopulations experiencing homelessness and includes at least one individual with current or former lived experience of homelessness. The current Leadership Committee is shown in Exhibit C. On November 18, 2016, the DuPage County CoC Bylaws were amended to include the DuPage County CoC name change, the addition of a nondiscrimination statement, the highlighting of the Conflict of Interest and Code of Conduct/Recusal Process for the Board, its Chair/s and any person acting on behalf of the board, and the addition of Voting by Majority Rules and Electronic Voting. Board members shall annually execute a Conflict of Interest and Code of Conduct and Recusal document in the form shown in Exhibit D.
- 4. In accordance with the regulations at 24 CFR 578.5(c), the DuPage County CoC shall have until August 29, 2014 to comply with all requirements of 24 CFR 578 Subpart B and which the DuPage County CoC has met all requirements and

is in full compliance.

# Responsibilities of the Continuum of Care

- A. Operation of the Continuum of Care
- 1. The DuPage County CoC holds meetings of the full membership, with published agendas, at least semi- annually.
- 2. The DuPage County CoC has an open invitation for new members to join. It is publicly available on the DuPage County CoC website:

  https://dupagehomeless.org/join-the-continuum/membership-process/
- 3. The DuPage County CoC has adopted and follows a written process to select the Leadership Committee, which acts as the board of the DuPage County CoC and acts on behalf of the DuPage County CoC. The process must be reviewed, updated, and approved by the DuPage County CoC Full Continuum membership at least once every 5 years. That process is in the adopted Bylaws of the DuPage County CoC and was reviewed and adopted on November 17, 2017, and again on November 4, 2022. That process must be reviewed, updated, and approved by the DuPage County CoC Full Continuum membership on or before November, 2027.
- 4. The DuPage County CoC has appointed additional committees. In November, 2018 the DuPage County CoC began the process of aligning its committee structure to update, expand, and strengthen committee goals and objectives towards making homelessness rare, brief, and one time. A summary of those committees is shown in Exhibit E. The organizational structure of the DuPage County CoC is shown in Exhibit F.
- 5. This governance charter has been developed in consultation with the collaborative applicant, which is DuPage County Community Services, and the Homeless Management Information System (HMIS) Lead, which is DuPage County Community Services. This governance charter shall be followed by the DuPage County CoC, the collaborative applicant, and the HMIS Lead; it shall be updated annually; and it contains all policies and procedures needed to comply with 24 CFR 578 Subpart B and with the HMIS requirements as prescribed by the U.S. Department of Housing and Urban Development (HUD).
- 6. The DuPage County CoC and DuPage County CoC funded providers will not discriminate on the basis of any protected characteristic, including age, race, ethnicity, national origin, religion, familial status, disability, gender, LGBTQ+ status, or marital status. DuPage County CoC funded housing shall be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status. Further, the DuPage County CoC, as well as all recipients of HUD Community Planning Department (CPD) funding will grant equal access to such facilities, benefits, accommodations, and services to individuals in accordance with the individual's gender identity and in a manner, that affords equal access to the individual's family. This applies to all

providers of services funded in whole or in part by any CPD program including owners, operators, and managers of shelters, and other buildings and facilities.

Through HUD's final rule entitled "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs" published in the Federal Register on September 21, 2016 HUD ensures equal access to individuals in accordance with their gender identity in programs and shelter funded under programs administered by HUD's Office of Community Planning and Development (CPD). This rule builds upon HUD's February 2012 final rule entitled Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity (2012 Equal Access Rule), which aimed to ensure that HUD's housing programs would be open to all eligible individuals' families regardless of sexual orientation, gender identity, or marital status.

- 7. The DuPage County CoC has consulted with recipients and subrecipients to establish performance targets appropriate for population and program types, it monitors recipients and subrecipient performance, it evaluates outcomes, and it takes action against poor performers. This is accomplished through meetings of the various committees, the application process for recipients of funding, and the ranking and scoring of applications by the Rank and Review committee based on criteria that examine outcomes and performance. A copy of the DuPage County CoC Ranking Policy is attached in Exhibit G.
- 8. The DuPage County CoC will evaluate outcomes of projects funded under the Emergency Solutions Grants program and the Continuum of Care program and will report such evaluations to HUD in the fashion and format required by HUD from time to time. Emergency Solutions Grants (ESG) shall be awarded by DuPage County through its Community Services Department after consultation with the DuPage County CoC on the criteria for funding and approval by the Rank and Review Committee on proposed awards.
- 9. The DuPage County CoC, in consultation with DuPage County through its Community Services Department (which is the recipient of ESG funds), has established a coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. A policy has been developed to guide the operation of the coordinated assessment system on how it addresses the needs of individuals and families who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, and stalking. The following committees are responsible for development of this policy: Coordinated Entry Oversight, Gaps and Needs, Data and Performance Measurement (HMIS), and Service and Program Coordination. A copy of this policy is attached in Exhibit H.
- 10. The DuPage County CoC, in consultation with DuPage County through its Community Services Department (which is the recipient of ESG funds), will establish and consistently follow written standards for providing Continuum of Care assistance. The Gaps and Needs Committee, Service and Program

Coordination Committee, and the DuPage County Community Development Commission are responsible for the development of these policies and procedures. Written standards for providing Continuum of Care assistance can be found at:

https://dupagehomeless.org/resources/emergency-solutions-grant-esg/

- B. Designating and Operating an HMIS.
  - 1. The DuPage County CoC HMIS is operated by DuPage County Community Services.
  - 2. The HMIS Lead is DuPage County Community Services.
  - 3. The Data and Performance Measurement (HMIS) Committee, with assistance from HMIS staff, is responsible to review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS. Such plans are then approved by the Leadership Committee. Last date of adoption for each is as follows:

Privacy Plan: Adopted by HMIS on 10/17/12; last updated on 12/19/19; approved by Leadership 01/08/20; approved by Leadership on 04/06/22; approved by Leadership on 04/27/23; approved by Leadership on 4/17/24; approved by Leadership on 4/9/25. Security Plan: Adopted on 10/30/09 as part of the HMIS Standard Operating Procedures (SOP); approved by Leadership on 12/05/18; approved by Leadership on 04/06/22; approved by Leadership on 04/27/23; approved by Leadership on 4/9/25. Data Quality Plan: Previously adopted by the HMIS Committee; formally adopted by the DuPage County CoC on 01/15/16; last updated on 12/19/19; approved by Leadership 01/08/20; approved by Leadership on 4/9/25. approved by Leadership on 04/06/22; approved by Leadership on 04/27/23; approved by Leadership on 4/17/24; Leadership on 4/9/25.

Roles and Responsibilities: adopted by the DuPage County CoC on 12/16/15; last updated on 12/19/19; approved by Leadership on 01/08/20; approved by Leadership on 04/06/22; approved by Leadership on 04/27/23; approved by Leadership on 4/17/24; approved by Leadership on 4/9/25.

The Standard Operating Procedure (SOP) is reviewed annually by the HMIS Data and Performance Measurement Committee.

- 4. Consistent participation in HMIS by recipients and subrecipients is a requirement of receiving DuPage County CoC or ESG funding. Such participation is assisted through provision of training opportunities and oversight of HMIS staff and the Data and Performance Measurement (HMIS) Committee.
- 5. The DuPage County CoC ensures that HMIS is administered in compliance with the requirements prescribed by HUD by assigning HMIS Lead staff members to review regulations and compliance requirements and report on needed actions to the Data and Performance (HMIS) Committee.

# C. Continuum of Care Planning

1. The DuPage County CoC had developed a plan that coordinated the implementation of a housing and service system within DuPage County that strived to meet the needs of individuals experiencing homelessness (including unaccompanied youth) and families. An updated plan began with committee restructuring in 2018. In 2019, continued work on the revised plan included strategies to prevent homelessness in DuPage County whenever possible and if homelessness cannot be prevented that it is a rare, brief, and one time experience. These updates, along with the original Executive Summary and the Blueprint for Moving Forward, can be found at the following link on the DuPage County CoC website:

https://dupagehomeless.org/strategies/dupage-county-plan-to-end-homelessness/

At a minimum, such a system encompasses the following:

- a) Outreach, engagement, assessment, coordination/referral, and prioritization
- b) Shelter, housing, and supportive services
- c) Prevention strategies
- 2. The DuPage County CoC plans for and conducts a point-in-time count of persons experiencing homelessness within DuPage County. Persons experiencing homelessness who are living in a place not designed or ordinarily used as regular sleeping accommodation for humans are identified and enumerated as unsheltered persons. Persons living in emergency shelters and transitional housing projects are identified and enumerated as sheltered persons. Other requirements promulgated by HUD by Notice are followed. The Street Count Committee is responsible for the point-in-time count.
- 3. The DuPage County CoC conducts an annual gaps analysis of the homeless needs and services available within the geographic area by utilizing information from HMIS, updating its bed counts, utilizing data from the point-in-time counts, and homeless provider survey.
- 4. The DuPage County CoC provides information to the DuPage County Community Development Commission (CDC) to update the Consolidated Plan for the DuPage County Consortium, as well as information for the Consolidated Annual Performance and Evaluation Report (CAPER)
- 5. The DuPage County CoC consults with the CDC, the entity which administers ESG funds on behalf of the recipient, DuPage County, on the plan for allocating ESG program funds and reporting on and evaluating the performance of ESG program subrecipients. The Rank and Review Committee sets the criteria for award of grant funds and the CDC runs an application process on behalf of the DuPage County CoC. Funding recommendations and application evaluations

are then returned to the Rank and Review Committee for action.

Recommendations of the Rank and Review Committee are then sent to the Leadership Committee for final approval. During the grant administration process, the CDC receives quarterly progress reports from each subrecipient. Such reports are analyzed against the outcome targets set for each project.

### Preparing an Application for Funds

#### A. Process. The DuPage County CoC:

- 1. Designs, operates, and follows a collaborative process for the development of applications and approves the submission of applications in response to a NOFO published by HUD. The DuPage County CoC follows a strict calendar and process each year that requires a business plan for all projects that is initially presented to the Gaps and Needs Committee. Agencies work collaboratively with each other and with the HMIS Lead to prepare information for submittal to HUD. The submission of applications, initially presented at the Gaps and Needs Committee, is then reviewed by the Rank and Review Funding Committee and approved by the Leadership Committee.
- 2. Priorities for funding are determined based on needs established by the Gaps and Needs Committee, the annual gaps analysis, consistency with DuPage County CoC strategies to prevent and end homelessness in DuPage County, and priorities established by HUD in the NOFO. In accordance with the Bylaws, it is the role of the Rank and Review Committee to develop funding criteria, application procedures, and ranking policy and procedures. Based on these procedures and an analysis of outcomes, the Rank and Review Committee may also recommend funding reallocation or funding cuts to the Leadership Committee. Also, in accordance with the Bylaws, the Leadership Committee is authorized to make all final decisions pertaining to allocation of funds and may also determine the need for re-allocation or funding cuts based on analysis of data and outcomes. Once it has been determined that reallocation or funding cuts is in the best interest of the DuPage County CoC, a representative or representatives of the Leadership Committee will communicate with the agency whose project is being reallocated or cut to discuss how the reallocation will occur and the timing of any reallocation or project funding cut. A copy of the DuPage County CoC Reallocation Policy is attached in Exhibit I.
- 3. In accordance with 24 CFR 578.9(b) requiring approval from the DuPage County CoC before submitting the consolidated application to HUD, the DuPage County CoC has designated the position of Chair of the DuPage County CoC Leadership Committee, along with an individual of their selection acting as a designated Alternate, to review the consolidated application and provide written feedback prior to approving the consolidated application and prior to its submission in HUD e-snaps.

- 4. The application is then submitted by DuPage County Community Services, as collaborative applicant, on behalf of the DuPage County CoC.
- B. Responsibility. The DuPage County CoC retains all of its responsibilities, even though it has designated a collaborative applicant. The collaborative applicant is DuPage County Community Services that operates as the lead agency of the DuPage County CoC.

### **Unified Funding Agency**

The DuPage County CoC has selected DuPage County, through its Community Services Department, to make application as the Unified Funding Agency, should this opportunity be available with funding to support the function.

#### Amendment to this Governance Charter

This Governance Charter shall be reviewed at least annually but may be amended and updated at any duly called meeting of the Leadership Committee. It is anticipated that amendments will be made as HUD issues further guidance on DuPage County CoC requirements.

DuPage County Continuum of Care	
By: Chair of Leadership Committee	Date:
By:Collaborative Applicant	Date:
By: HMIS Lead	Date: