



Boys & Girls Club of Northern Utah Homeless Prevention Program 2025-26
Policies, Procedures & General Information

Initial Screening

1. Must be at imminent risk of being homeless.
2. Must have a child in school or under 18 living in the home.
3. All capable adults must have a job or capacity to pay rent/living expenses
4. Must be willing to participate in case management for 3-6 months

SECTION 1: GENERAL INFORMATION

A. PURPOSE OF POLICIES AND PROCEDURES MANUAL

This document is designed to assist with implementing the Boys & Girls Club of Northern Utah's At Risk of Homelessness prevention program. It contains required program and administrative policies and procedures and is to be used as a reference for administration, staff and participants associated with the BGCNU Homeless Prevention Program. It is the responsibility of program staff to disseminate pertinent information and ensure that all staff and partner agencies are aware of, understand and comply with policies and procedures in this guide.

This document does not replace the provisions contained in the Department of Housing and Urban Development existing policies or any other applicable Federal, State and local laws, or ordinances and regulations pertaining to the BGCNU HPP.

B. Boys & Girls Club of Northern Utah Homeless Prevention Program Description (BGCNU HPP)

The Boys & Girls Club of Northern Utah will provide homeless prevention services focused on making episodes of homelessness rare, brief and nonrecurring. The services provided by this project will meet all requirements related to the funding in place.

1. Homeless Prevention Assistance: For individuals and families who are currently in housing but *at imminent risk* of becoming homeless and who need temporary assistance to prevent them from *becoming* literally homeless as defined in HUD Category 1 At Risk of Homelessness. <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/at-risk-of-homelessness/>

BGCNU Homeless Prevention Program may include:

Financial Assistance:

Rent; Security and utility deposits; Utility payments; Childcare, Transportation, Training or Employment Related Costs

Housing Stabilization Services:

Case management; Outreach and engagement; Housing search and placement

This Homeless Prevention Program is not intended to provide long-term support for program participants, nor will it be able to address all of the financial and supportive services needs of households that affect housing stability.

These resources are to be targeted and prioritized to serve households that are most in need of this temporary assistance and are most likely to achieve stable housing, whether subsidized or unsubsidized, after the program concludes.

Assistance will be focused on: housing stabilization; linking program participants to community resources and mainstream benefits; helping program participants develop a plan for future housing stability that will continue after assistance ends.

C. COORDINATION WITH RECOVERY ACT AND OTHER RESOURCES

Participants are strongly encouraged, as part of local planning and coordination activities, to maximize all resources that may be available. This program through the case management requirement will coordinate the spending of Homeless Prevention funds with other funding streams, so that eligible activities under other funding programs are utilized when available to create a comprehensive package of housing and service options available to eligible program participants.

D. BGCNU HPP SERVICE DESIGN & DELIVERY

- Prevention will be most effective when they are targeted directly to resolving a particular household's specific barriers to maintaining and keeping housing.

- “Just enough” – households should receive the minimum amount of assistance necessary to resolve the immediate crisis and prevent its near-term recurrence.
 - Linkage to mainstream resources is critical to some households’ ability to achieve housing stability and maximizes resources.
 - Coordination with community-based and mainstream services makes existing services more accessible and effective while avoiding duplication.
1. Train staff on other Continuum of Care/community resources and programs to ensure best “fit” for participant.
 2. Be clear about what HPP can do and what it cannot do – with both staff and participants.
 3. Design flexible program services that can vary in type, level and duration based on need.
 4. Train staff on other community-based and mainstream resources to ensure needs are met.
 5. Use client assessment to identify system gaps.

BGCNU will meet the needs of the client and will not discriminate based on disability or capacity, meeting the household where they are ensuring equality in determining service design and delivery.

E. Data Privacy Policy – All information gathered is kept in a locked cabinet in a locked closet with limited staff access. Only HPP staff have access to the paperwork gathered. Staff have a strict understanding of the need for security and confidentiality of the information. Limited HPP staff have access to the Utah Homeless Management Information System (UHMIS) and have gone through all training and required documentation required for access. Computers and devices used by staff on site are password protected with two factor authentication and locking screens. Internet access follows the highest security protocols including anti-virus software, firewalls and automatic updates. BGCNU contracts with MAISE technology to continually address and improve technical security.

Boys & Girls Club UHMIS staff collect and use only information that is needed for reports on Section: Administrative Policies Pages: Subject: HMIS Data Sharing Effective Date: 04/01/2021 Revision Date: 04/10/2025 Page 2 of 6 homelessness to help inform policy decisions. Every person with access to this information must sign and comply with all confidentiality agreement

F. Data Sharing Policy - All data entered by Boys & Girls Club Staff will align with the UHMIS Data sharing policy. This agency is part of the Utah Homeless Management Information System (UHMIS). UHMIS is a system that uses computers to collect information about homelessness. UHMIS operates over the internet and uses many security protections to keep client information safe. Many service providers across Utah use UHMIS, so client information will be shared with other service providers that provide similar services. Limited Boys & Girls Club Staff have access to the data provided through this program and none of this data is kept on local servers or computers.

SECTION 2 CLIENT ELIGIBILITY

A. REQUIREMENTS FOR ALL PROGRAM PARTICIPANTS: AT IMMINENT RISK OF HOMELESSNESS

1. **ASSESSMENT:** BGCNU program staff will provide everyone an initial consultation and eligibility assessment to determine HPP eligibility and the type, level, and duration of assistance for each potential program participant. Eligibility assessments must be documented and kept in client file. BGCNU will have a process in place to refer persons ineligible for HPP assistance to the other resources or service providers that may be able assist them.
2. **ELIGIBILITY:** Household must be at or below 50 percent of the Area Median Income (AMI). AMI limits are available on HUD’s web site at: <http://www.huduser.org/DATASETS/il.html>. Households must be located in Box Elder County, have youth in the household and be referred into the program from an existing service provider in Box Elder County.
3. **HOUSING STATUS:** The household must be either *at imminent risk of homelessness* as defined by HUD and if specific resources are provided can remain in the housing situation currently residing in.
4. BGCNU may add additional eligibility criteria
BGCNU must ensure additional criteria are applied consistently.
Administration will review additional criteria documentation and ensure it is based on increasing equality in serving households and follows HUD policies and procedures.

B. STAFF CERTIFICATION OF ELIGIBILITY

A BGCNU Assessment must be completed for each household and placed in case file.

Form certifies that:

Household meets all eligibility criteria for assistance.

True and complete information was used to determine eligibility.

No conflict of interest exists related to the provision of assistance.

C. ELIGIBILITY CONTINUATION

Client eligibility is continued with the expectation of 6 months of case management with goals met monthly and reported on monthly. Using standard case management goals and expectations; and Determining appropriateness of type, level, and continuation of services.

D. INCOME DETERMINATION

Each household served with financial assistance and/or housing and stabilization services must be determined to be at or below 50% of Area Median Income (AMI) through an income determination process that includes identifying the applicable AMI, documenting income, and calculating household income. Documentation in the household files must meet HUD's income eligibility determination and documentation guidance. Each household must have income with the capacity to pay the rent and costs associated with the housing they are currently living in so that the families ability to stay housed after the conclusion of the program.

E. CLIENT EXPECTED CODE OF CONDUCT

1. Clients are expected to meet the following expectations and can be exited from the program for violating any of the following policies:

a. Respectful communication: Clients must treat staff and other participants with dignity and respect. Intimidation, harassment, bullying, and making derogatory remarks based on characteristics like race, religion, gender, or sexual orientation is prohibited.

b. Safety: Actions that endanger the safety, health, or well-being of others, such as threats of violence, fighting, or horseplay are prohibited. Apparent use of drugs, alcohol or any illicit or illegal substances while at the center is strictly prohibited. Items that are not allowed on program property include weapons, drugs, and alcohol.

c. Use of property: Clients are required to respect the Club program and property and the belongings of others.

d. Technology use: Use of electronic devices and social media while on club property will be appropriate.

2. Client program related requirements

1. Required Documentation provided including initial application and all required documentation related to application

2. Case Management meetings and documentation as required.

3. 6 months of case management meetings

4. Must be a citizen in good standing without unanswered arrest warrants

SECTION 3 ELIGIBLE ACTIVITIES

A. PROGRAM ACTIVITIES AND EXPENSES FOCUS

Eligible activities and expenses are intentionally focused on housing:

1. Financial assistance to help pay for rental housing, and/or

2. Services designed to keep people in housing or to find housing

The primary goal of this program assistance is maintain housing stability. Programs should ensure that there is a clear process for determining the type, level, and duration of assistance for each program participant.

B. CATEGORIES AND POLICIES OF ELIGIBLE PROGRAM EXPENSES

1. Administrative Costs

Eligible Administrative Costs

_Staff salaries associated with these administrative costs

_Training for staff who will administer the program or case managers who will serve program participants

2. Data Collection and Evaluation

_Data collection and reporting is conducted through the Homeless Management Information System Database (HMIS) <http://hmis.utah.gov>

_Reasonable and appropriate costs associated with operating the HMIS, or a comparable database, are allowable expenses, e.g.

3. Financial Assistance

a. Financial Assistance Cost Types:

1. Rental Assistance

Tenant-based rental assistance can be provided to allow individuals and families to remain in their existing rental units (Prevention)

Short-term (1-3 months)

Consecutive: Needs not be consecutive months of assistance.

Arrears: May include up to 2 months of arrears (each month counts as one month of assistance) regardless of when they were incurred, provided that the existence of the arrears prevents the eligible participant from remaining in, or obtaining, housing.

Lease Requirement:

Written lease or occupancy agreement required

Must identify applicant as tenant, landlord as payee, property location, rent amount, terms.

Flexibility: BGCA has the flexibility to determine the amount of rental assistance provided.

'Needs based': Assistance should be "needs-based" providing the minimum amount needed to prevent program participant from become homeless.

Rent Reasonableness: Rental assistance paid cannot exceed the actual rental cost, which must be in compliance with HUD's standard of rent reasonableness. See HUD's [Rent Reasonableness Worksheet](#) .

b. Security and Utility Deposits

BGCA has the discretion to determine how to handle security deposits.

Agencies must certify that a unit has passed habitability

Utility Deposit: Utility deposits are generally required to pay for service connection, often due to poor credit, lack of credit, or history of late payments or outstanding bills with utility company. Utility deposits are also required when utilities have been "shut-off" by utility company and household must pay full amount of outstanding bill to resume service.

c. Utility Payments

May be used for up to 3 months, including up to 2 months of utility payments in arrears, provided that the program participant or a member of his/her household:

has an account in his/her name with a utility company, OR

has proof of responsibility to make utility payments, such as cancelled checks or receipts in his/her name from a utility company.

Utilities eligible for assistance are heat, electricity, water, sewer and garbage collection. Telephone and cable are not eligible expenses.

Months need not be consecutive, or concurrent with rental assistance.

Utility-only assistance is eligible, but HUD expects this will be rare and expects the following three factors to be confirmed and supported by documentation in the household file:

1. the utility will be disconnected if full or partial payment is not made (and there is no law preventing shut off)
2. the shut off will cause the housing to become unsafe or cause eviction; and
3. no other utility assistance (e.g., LIHEAP) is available to prevent shut off.

d. Additional Funding for Housing Policy

Assistance payments cannot be made on behalf of eligible individuals or families for the same period of time and for the same cost types provided through another federal, state, or local program.

e. Payment Verification/Documentation

BGCANU is responsible for verifying and documenting all payments made on behalf of the program participant in an easily identifiable manner that can be monitored.

f. 3rd Party Payments:

BGCNU must not make payments directly to program participants, but only to third parties, such as landlords or utility companies.

4. Housing Relocation and Stabilization Services

Prevention program funds may be used for services that assist program participants with housing stability and short-term 1-3 months. These services are limited to the following eligible activities:

a. Case Management

Case management funds may be used for activities for the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of program participants, and helping them obtain housing stability.

- ☒ _Component services and activities may include:
- ☒ _counseling, classes, life skills building
- ☒ _developing, securing, and coordinating services
- ☒ _monitoring and evaluating program participant progress
- ☒ _assuring that program participants' rights are protected
- ☒ _developing an individualized housing plan, including a path to permanent housing stability subsequent to program financial assistance.

☒ _For more detailed information on Case Management, see <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-additional-requirements/service-requirements/case-management/>

b. Outreach and Engagement

Funds may be used for services or assistance designed to publicize the availability of programs to make persons who are homeless or almost homeless aware of these and other available services and programs.

SECTION 4 PROGRAM ADMINISTRATION

1. ADMINISTRATIVE REQUIREMENTS

☒ _Non-profit BGCA shall be subject to the requirements of 24 CFR part 84.

2. CONFIDENTIALITY OF CLIENT RECORDS

BGCA will follow established procedures to ensure:

- a. The confidentiality of records pertaining to any individual provided with assistance,
- b. That the address or location of any assisted housing will not be made public, except to the extent that this prohibition contradicts a preexisting privacy policy of the grantee.

3. CONFLICTS OF INTEREST

a. General. No person who is an employee, agent, consultant, officer, or elected or appointed official of the grantee and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, either for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter.

4. BGCNU & PROGRAM ACCESSIBILITY POLICIES & PROCEDURES

a. The Boys & Girls Club of Northern Utah is committed to accessibility and will work to:

1. ADA Standards that ensure our physical spaces (e.g., offices, event venues) meet ADA standards for accessibility.
2. Reasonable Accommodations to provide reasonable accommodations to meet individual needs, such as accessible restrooms, ramps, and assistive listening devices.
3. Barrier Removal actively identify and remove physical barriers that may impede access for individuals with disabilities.
4. BGNU will provide language services, translators and assistance to address barriers associated with language and reading skills.

b. BGCNU will address inclusive communication through:

1. Staff Training staff on disability awareness, including etiquette and communication strategies.
2. Inclusive Language by using respectful and inclusive language, avoiding stereotypes and assumptions.
3. Alternative Formats and Offering information in alternative formats (e.g., large print, audio, Braille) to cater to diverse needs.
4. Feedback Mechanisms, establishing mechanisms for gathering feedback from individuals with disabilities to identify areas for improvement.

c. BGCNU will continue working towards accessibility including policy development and Implementation:

1. Utilizing an accessibility plan that outlines steps to prevent and remove barriers to accessibility.
2. Conducting regular accessibility audits (both digital and physical) to identify and address potential barriers.
3. Continuously evaluating and updating accessibility practices to ensure ongoing compliance and improvement.
4. Seeking input from individuals with disabilities and disability organizations to ensure that accessibility efforts are effective and relevant.
5. Advocating for accessibility policies and practices within the community.

By implementing these measures, The Boys & Girls Club of Northern Utah can create a more inclusive and welcoming environment for everyone, enhancing our impact and fulfilling our mission of serving the community.

SECTION 5 ADDITIONAL PROJECT ADMINISTRATIVE RESPONSIBILITIES

- A. BGCNU shall: provide DWS with a copy of organization policies & procedures and commits to the following:
1. Staff will participate in local coordinated entry systems, including consistent contributions benefitting the maintenance of the applicable Continuum of Care by name list and Local Homeless Council prioritization processes.
 2. Referral process for individuals or heads of households for case management in alignment with DWS-OHS Case Management Standards. <https://jobs.utah.gov/department/rfg/ohsattain/append4.pdf>
 - a. BGCNU Case managers will utilize the Utah Homeless Management Information System (UHMIS) to record case management
 - b. Service plans will be created with the client within 7 days of entering the project as required by the project-based timeframe and entered in accordance with all applicable data standards.
- B. BGCNU policies and procedures will align with the housing prevention policies as funded by this project. BGCNU will:
1. Participate in technical assistance activities provided by DWS-OHS.
 2. Ensure all project funded personnel are in compliance with the requirements outlined in the project contract with signed code of conduct, background check, non disclosure agreement and all legal documentation for hire.


Section 6 Client Rights

Clients have the right to get services even if they choose NOT to participate in the UHMIS. Clients have the right to ask who has seen their information. Clients have the right to see their information and to change it if it's not correct. Clients must show documentation to do so.

HMIS clients have the right to file a grievance or complaint if they believe their privacy has been violated, data is incorrect, or they were denied access to their records. Complaints are submitted in writing to the agency or HMIS Administrator, and retaliation for filing a complaint is prohibited.

Questions, comments or problems can be addressed to: finances@bgcnu.org

past

Utah Homeless Management Information System: Privacy Posting			
Why do we collect and enter your information	<ul style="list-style-type: none"> • To serve you <ul style="list-style-type: none"> ○ To provide or coordinate services for you. ○ To locate programs that may be able to assist you. ○ To help us fund the services provided to you. ○ To avert a serious threat to health or safety at this facility or when required by law relevant to this provider. • To improve services in Utah for all persons experiencing or at risk of homelessness <ul style="list-style-type: none"> ○ To understand the impact of homelessness services and identify ways to improve them systematically. ○ To meet federal, state, and local requirements for data collection by homelessness services providers. ○ To carry out maintenance and operation of UHMIS. 		
Who do we share your information with	<p>With your consent, your identifying information is shared in the database with all UHMIS Participating Organizations. A complete list of participating organizations can be found at UtahHMIS.org/Participating-Agencies or by scanning the QR code on this document.</p> <p>If you are served by a program that utilizes UHMIS, your information must be entered into the system. This provider can limit sharing of your information if you choose, but they cannot restrict sharing entirely. If you do not consent to your information being shared in UHMIS, this provider will still be able to see your information, as well as a small number of other users, primarily for maintenance of UHMIS and security oversight.</p> <p>Your information is never sold, used commercially, or shared publicly.</p> <p>More information can be found in the UHMIS Privacy Policy, provided to you by scanning the QR code in this posting, going to UtahHMIS.org/Governance, or asking a staff person at this agency.</p>		
Your rights	<ul style="list-style-type: none"> • You may request this document or any UHMIS document in a format better suited to your needs. • You may receive services even if you choose not to share your information with one or all UHMIS participating organizations. • You have the right to ask who has access to your information. • You have the right to see your and your legal dependents' information and change it if it's incorrect. 		
Contact	Agency	UHMIS Leadership	More Information
Name:	Jeanette Jensen	UHMIS Lead Agency	
Email:	jjensen@bgcnu.org	HMIS@utah.gov	
Address:	600 E. 700s. Brigham City UT 84302	P.O. Box 142975 Salt Lake City, UT 84114	
<p><i>This notice describes how this agency will use and protect the information about you and your dependents entered in UHMIS and your rights to decide how your information is shared. UHMIS Leadership can amend the policies stated in this posting anytime; please read the full UHMIS Privacy Policy for more details.</i></p>			

Sistema de información de gestión de personas sin hogar de Utah: Aviso de privacidad

Este aviso describe cómo esta agencia utilizará y protegerá la información sobre usted y sus dependientes ingresada en el Sistema de información de gestión de personas sin hogar de Utah (UHMIS, por sus siglas en inglés) y sus derechos para decidir cómo se comparte su información. Los líderes de UHMIS pueden modificar las políticas establecidas en este aviso y su Política de privacidad de UHMIS relacionada en cualquier momento. Lea la Política de privacidad completa de UHMIS para obtener más información.

Por qué recopilamos e ingresamos su información	<ul style="list-style-type: none"> • Para proporcionarle o coordinar servicios para usted. • Para encontrar otros programas que puedan ayudarlo. • Para funciones relacionadas con el pago o el reembolso de los servicios prestados por o en nombre de las agencias asociadas. • Para llevar a cabo funciones administrativas. • Para cumplir con las obligaciones de informar al gobierno y a los financiadores. • Para fines de análisis de datos e informes de la comunidad, incluida la presentación de informes a Continua of Care para informar las decisiones sobre políticas. • Para investigaciones académicas y cuando lo exija la ley. 	
Uso y divulgación de su información	<p>Su información personal puede usarse o divulgarse con su consentimiento por los siguientes motivos:</p> <ul style="list-style-type: none"> • Para proporcionar o coordinar servicios para usted y su familia para ayudarlos a terminar con su falta de vivienda. • Para fines de integración de datos con otros sistemas o almacenamiento de datos. <p>Su información personal puede usarse o divulgarse sin su consentimiento por los siguientes motivos:</p> <ul style="list-style-type: none"> • Para funciones relacionadas con el pago o el reembolso de los servicios prestados por o en nombre de las agencias asociadas. • Para llevar a cabo funciones administrativas. • Para llevar a cabo el mantenimiento y la operación del UHMIS. • Para crear informes para los Continua of Care que incluyan sus datos, pero solo de manera que no se revele su identidad (este tipo de datos a veces se denomina datos "anonimizados" o "sin datos de identificación"); • Cuando lo exija la ley, y la única información compartida cumplirá con los requisitos de la ley. • Para evitar una amenaza grave a la salud o la seguridad. • Para informar sobre una persona que se cree que es víctima de abuso, negligencia o violencia doméstica a una autoridad gubernamental (incluida una agencia de servicios sociales o de protección) autorizada por ley para recibir denuncias de abuso, negligencia o violencia doméstica. • Para fines de investigación académica. 	
Sus derechos y opciones	<ul style="list-style-type: none"> • Puede solicitar este documento o cualquier documento de UHMIS en un formato que se adapte mejor a sus necesidades y comprensión. • Puede recibir servicios incluso si decide no compartir su información con una o todas las organizaciones participantes de UHMIS. • Tiene derecho a preguntar quién tiene acceso a su información. • Tiene derecho a ver su información y la de sus dependientes legales y a cambiarla si no es correcta. 	
Contacto	Agencia	Liderazgo del UHMIS
Nombre:	Jeanette Jeffries	Agencia líder del UHMIS
Dirección:	650 E. 700 S. Bingham City, UT 84302	P.O. Box 142975 Salt Lake City, UT 84114
Teléfono:	435-733-6224	385-707-6365
Correo electrónico:	jjeffries@bgcnu.org	HMIS@utah.gov



UHMIS Security Incident Policy & Procedure

1. Purpose

This policy outlines the steps to detect, report, and respond to security incidents involving Homeless Management Information System (HMIS) data to ensure the confidentiality, integrity, and availability of client information.

2. Scope

This policy applies to all staff, volunteers, and contractors ("users") at The Boys & Girls Club of Northern Utah who have access to UHMIS data.

3. Definition of a Security Incident

A security incident is any event that results in the accidental or deliberate unauthorized access, loss, disclosure, modification, disruption, or destruction of HMIS data.

Examples include:

- Lost or stolen laptops, tablets, or phones containing PII/PHI.
- Phishing scams or malware infection on workstations.
- Sharing passwords or allowing unauthorized access to the system.
- Paper reports with PII left in unsecured areas.

4. Reporting Procedures

- **Immediate Action:** Upon detecting a potential security incident, users must immediately secure the affected equipment (if possible) and report it to the JeuneElle Jeffries at jjeffries@bgcnu.org who will immediately report it to Maise Technology. All incidents will be tracked and recorded for review at the main office of the organization.
- **Agency Reporting:** The Agency Security Officer must notify the UHMIS Lead Agency within [e.g., 24 hours] of discovering the incident.

5. Response and Mitigation

- **Containment:** The Boys & Girls Club of Northern Utah will take immediate steps to contain the breach (e.g., disabling user access, disconnecting affected machines from the network) and immediately contact our Technical Company Maise Technology to address the breach.
- **Investigation:** The Agency Security Officer will document the "who, what, when, where, and how" of the incident.
- **Notification:** The UHMIS Lead Agency will assist in determining if clients, law enforcement, or regulatory bodies need to be notified.

6. Training and Compliance

- All users must complete annual security training.
- Failure to report a security incident may result in disciplinary action, up to and including termination of access privileges.



UHMIS Data Security Incident Policy & Procedure

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- Failure to report a security incident may result in disciplinary action, up to and including termination of access privileges.



UHMIS Data Quality Policy & Processes

1. Data Relevancy: Information input into the UHMIS will be determined relevant if it meets the most current HMIS Data Standards pushed by HUD.

2. Data Accuracy: The purpose of accuracy is to ensure that the data in the UHMIS is the best possible representation of reality as it relates to persons who are homeless or formerly homeless and the programs that serve them. To that end, all data entered into the UHMIS shall be a reflection of information provided by the client, as documented by the UHMIS user or otherwise updated by the client and documented for reference. *Recording inaccurate information, both intentional and unintentional, is strictly prohibited.*

2. Validation The Boys & Girls Club is responsible for having data validation procedures that are effective in finding and correcting data entry errors at least quarterly. Data validation procedures are available during UHMIS monitoring and may be reviewed by the UHMIS System Administration during annual monitoring. Further, The Boys & Girls Club will have client files and/or real-time data collection processes reviewed during the UHMIS monitoring process as described in the monitoring section.

2.2 Data Accuracy: Training All data in UHMIS shall be collected and entered in a common and consistent manner across all programs. UHMIS System Administrators will provide new end-user training, annual recertification training, and other training as determined by UHMIS leadership to all UHMIS users.

2.3 Data Collection outside of UHMIS: The Boys & Girls Club will have any and all data collection documents created for the The Boys & Girls Club available during UHMIS monitoring to review the documents for consistency between the UHMIS and the data collection document.

3. Data Completeness: The goal of UHMIS is to collect 100% of all data elements for all clients served with an applicable UHMIS project. Missing data could mean the client does not receive needed services and comprehensive care; services that could help them become permanently housed and end their episode of homelessness.

The Boys & Girls Club will review their own Data Quality and compare the error rates to verify that the Boys & Girls Club meets the data completeness standards set by UHMIS. UHMIS System Administration will monitor both Boys & Girls Club data quality reports and data quality policies during the monitoring described within the monitoring section of this document.

4. Data timeliness: UHMIS mandates that The Boys & Girls Club will enter data into UHMIS no more than five business days after any service or contact is conducted with any client for any UHMIS participating project which may include but is not limited to: Emergency Shelter, Permanent Housing, Transitional Housing, Street Outreach, or Homeless Prevention.

5. Monitoring: To ensure that the UHMIS data quality plan is followed by the Boys & Girls Club participating in UHMIS, this plan documents the expectations and methods for monitoring activities related to UHMIS quality. It is expected that the Boys & Girls Club and its staff will meet or exceed the data quality benchmarks described in the UHMIS Data Quality Plan. The Boys & Girls Club may face consequences up to termination of access to the UHMIS, dependent on the severity of the issue, and at the discretion of the UHMIS Steering Committee. All monitoring will be done in accordance with the UHMIS Monitoring Toolkit posted at UtahHMIS.org/Governance.

BGCNU Accessibility Policy

The Boys & Girls Club of Northern Utah is committed to accessibility and will work to:

- **(ADA Standards)** ensure our physical spaces (e.g., offices, event venues) meet ADA standards for accessibility.
- **(Reasonable Accommodations)** provide reasonable accommodations to meet individual needs, such as accessible restrooms, ramps, and assistive listening devices.
- **(Barrier Removal)** actively identify and remove physical barriers that may impede access for individuals with disabilities.

And address inclusive communication through:

- **(Staff Training)** Training staff on disability awareness, including etiquette and communication strategies.
- **(Inclusive Language)** Using respectful and inclusive language, avoiding stereotypes and assumptions.
- **(Alternative Formats)**. Offering information in alternative formats (e.g., large print, audio, Braille) to cater to diverse needs.
- **(Feedback Mechanisms)**. Establishing mechanisms for gathering feedback from individuals with disabilities to identify areas for improvement.

Continued work towards accessibility including Policy Development and Implementation:

- **(Accessibility Plan)** Utilizing an accessibility plan that outlines steps to prevent and remove barriers to accessibility.
- **(Regular Audits)**. Conducting regular accessibility audits (both digital and physical) to identify and address potential barriers.
- **(Continuous Improvement)**. Continuously evaluating and updating accessibility practices to ensure ongoing compliance and improvement.
- **(Community Engagement)**. Seeking input from individuals with disabilities and disability organizations to ensure that accessibility efforts are effective and relevant.
- **(Advocate for Accessibility)** Advocating for accessibility policies and practices within the community.

By implementing these measures, The Boys & Girls Club of Northern Utah can create a more inclusive and welcoming environment for everyone, enhancing our impact and fulfilling our mission of serving the community.



**BOYS & GIRLS CLUB
OF NORTHERN UTAH**

Client Complaint Policy

PURPOSE: To assure that clients experiencing problems may seek resolution in an equitable, non-punitive manner and with no adverse repercussions to the client.

POLICY

1. Clients shall have the opportunity to express themselves regarding problems they are having with the program without being subject to any adverse action.
2. There shall be an appeal process that exists independently of the specific program activity that is the subject of the grievance, and shall have various levels of appeal
3. Client's grievances must be transmitted without alteration, interference or delay to the party responsible for receiving and investigating it.
4. If the client perceives themselves as subject to substantial risk of imminent physical or sexual abuse and there is capacity of its validity, the Club will cease the work of that program or staff until a thorough investigation is conducted and authorities are contacted.

PROCEDURE

1. The Client shall initiate the grievance with the appropriate site and program staff giving Club staff the opportunity to address any issues at the program level – unless physical or sexual abuse is involved – physical and sexual abuse should be reported to officials immediately.
2. If the grievance is not addressed by site specific staff the client shall communicate the grievance with administration in writing – via email or letter.
3. Club administrator shall communicate complaint with the Executive Board President and the board members associated with the areas involved in the complaint. Club administration shall communicate with the client within seventy-two (72) hours of receipt of the grievance, and shall review all aspects of the problem(s) outlined.
4. Club administration shall provide the client a full report of the investigation and outcomes, work, changes, or actions that are a result of said investigation. The report shall include specific documentation and if necessary rational as to why the client's grievance was denied.

Written communication can be sent to:

Club Administration

finances@bgcnu.org

650 E. 700 S. Brigham City, Utah. 84302

5. If a third party files a request/grievance on behalf of a client the Club may require as a condition of processing the request that the alleged victim agree to have the request filed on his behalf and may also require the alleged victim to pursue any subsequent steps in the administrative remedy process personally.
6. Clients may be refused services or filing a grievance in bad faith.

Attachment D DWS-OHS CASE MANAGEMENT STANDARDS

OVERVIEW

A **housing focused model** must be followed with all projects funded by DWS-OHS. The purpose of any case management activity should be to assess the client's needs, connect and make referrals to community-based providers, engage the client in developing an applicable housing focused service plan, and follow up on the status of addressing a client's needs. Case management services must be routinely attempted with clients and program assistance may not be contingent on the client participating in such activities. A client must not be evicted or terminated from a project for failure to meet with a case manager. Both case management activities and service plans should be used as a collaboration tool between community-based providers where consent has been granted and the collaboration will help meet the needs of a participating individual.

Case managers must utilize the Utah Homeless Management Information System (UHMIS) or an approved UHMIS comparable database to record case management services and service plan progress. Service plans should be created with the client within the project-based timeframe below and entered in accordance with all applicable data standards.

Project Type	Service Plan Should be <u>CREATED</u> Within
Rapid Re-housing and Homeless Prevention	(7) calendar days of project enrollment
Transitional Housing	(7) calendar days of project enrollment
Permanent Supportive Housing	(7) calendar days of project enrollment
Emergency Shelter (Entry/Exit)	(7) calendar days of project enrollment
Emergency Shelter (Night by Night)	(7) calendar days of project enrollment
Street Outreach	(7) calendar days of project enrollment

DEFINITIONS

A **housing focused model** is a service approach that prioritizes assisting individuals and families experiencing homelessness in obtaining and maintaining housing.

Additionally, this approach is client-led and does not have preconditions and barriers to program entry, such as sobriety, treatment, or service participation requirements. A **case manager** must abide by the housing focused model and should support a client in addressing their physical, psychological and social needs. In addition, a case manager will help a client make progress towards exiting homelessness and obtaining/maintaining housing.

Case managers are responsible for working with a client to create service plans. A **service plan** is an ongoing assessment of a client's service needs (i.e., social, employment, mental health, transportation) with the overarching goal of helping a client address the needs associated with obtaining or maintaining stable housing. A service plan should be created within (7) calendar days of project enrollment.

PROJECT-BASED CASE MANAGEMENT

Rapid Re-housing (RRH) and Homeless Prevention (HP)

All individuals enrolled in RRH or HP projects must have access to case management. In addition to assessing physical, psychological, and social needs, service plans must evaluate the client's ability to resume rent after program assistance ends, work towards increasing all available sources of income, and make long-term connections to mental and physical health supports, transportation, and other applicable resources that support housing stability.

Housing case managers are expected to attempt to engage the client in case management activities at least monthly, including reviewing, monitoring, and modifying service plans. When possible, case management meetings should take place in the client's home. While monthly meetings are the foundation for effective case management, projects are required to provide adequate support throughout the client's enrollment in order to meet their individual needs. Projects should maintain flexible case management schedules as indicated by project and client needs.

Transitional Housing (TH)

All individuals enrolled in a TH project must have access to case management. Required service plans must assess the client's ability to resume rent after program assistance ends, work towards increasing all available sources of income, and make long-term connections to mental, social, and physical health supports, transportation, and other applicable resources that support housing stability.

Housing case managers are expected to attempt monthly case management and engage with clients for the purpose of reviewing, monitoring, and modifying service plans. When possible, case management meetings should take place in the client's home. While monthly meetings are the foundation for effective case management, it is required that projects provide adequate support throughout the client's enrollment. Projects should maintain flexible case management schedules as indicated by project and client needs.

Permanent Supportive Housing (PSH)

All individuals enrolled in a PSH project must have access to monthly case management and a corresponding service plan to help clients achieve long term goals and retain permanent housing. In addition to assessing physical, psychological, and social needs, service plans could explore move on strategies in the event that program assistance ends. During this exploration, case managers must help facilitate the client's relationship with Continuum of Care (CoC), HUD-funded multifamily housing, and mainstream community-based providers.

Case managers are expected to engage with clients at least monthly to review, monitor, and modify service plans. When possible, case management meetings should take place in the client's home. While monthly meetings are the foundation for effective case management, it is required that projects provide adequate support throughout the client's enrollment. Projects should maintain flexible case management schedules as required by project needs.

Emergency Shelter (ES) (Entry/Exit and Night-by-Night)

All individuals enrolled in an ES project must have access to case management. Aside from evaluating physical, psychological, and social needs, service plans should focus on supporting the client's goals of obtaining and securing housing as quickly as possible. Though projects should maintain flexible case management schedules as required by project and client needs; weekly case management should be attempted to provide adequate support to a client throughout their enrollment. Case managers are expected to review, monitor, and modify service plans with the client at least monthly.

Street Outreach (SO)

All individuals enrolled in a SO project must have access to case management. Required service plans primarily support the client's goals of obtaining and securing stable housing as quickly as possible.

Service plans may include plans to temporarily stay with friends or family or enter an appropriate residential project, such as emergency shelter or a healthcare facility. When appropriate and desired by the client, service plans could also include goals related to increasing all available sources of income, long-term connections to mental, social, and physical health supports, transportation, and other needs to support housing stability.

Though projects should maintain flexible case management schedules as required by project and client needs; weekly case management should be attempted to provide adequate support to a client throughout their enrollment. Case managers are expected to engage with clients at least monthly to review, monitor, and modify service plans with the client.