



Board of Directors Meeting Agenda

Tuesday, December 16, 2025 at 5:30 PM

Board Room, 540 Jenner Drive, Allegan, MI 49010

(To attend virtually via Microsoft Teams: [Click here to join the meeting](#) or by audio only via telephone: call 1-616-327-2708, and enter ID 598 536 159#)

1. Call to Order – Alice Kelsey
2. Pledge of Allegiance
3. Roll Call – Alice Kelsey
4. Provision for Public Comment (agenda items only, 5" limit per speaker)
5. Approval of Agenda
6. Consent Agenda

(All items listed are considered routine and will be enacted by one motion without separate discussion of each item. If discussion is desired, a board member may request the removal of any item from this list.)

 - a. **Motion** – Approval of prior minutes:
 - i. Board Meeting (11/18/2025)
 - ii. Finance Committee (11/18/2025)
 - iii. Program Committee (11/18/2025)
 - iv. Executive Committee (11/14/2025)
 - v. Recipient Rights Advisory Committee (09/16/2025)
7. Program Committee – Jane LaBean
 - a. **Motion** – Approval of 2026 Program Presentation Schedule
8. Finance Committee Report – Beth Johnston
 - a. **Motion** – Approval of Voucher Disbursements
 - b. **Motion** – Approval of FY2026 Contracts
9. Recipient Rights Advisory Committee (Mar/June/Sep/Dec) – Glen Brookhouse
10. LRE Updates – Mary Dumas or alternate
11. Chairperson's/Executive Committee Report – Alice Kelsey
12. OnPoint Chief Executive Officer's Report – Mark Witte
13. Provision for Public Comment (any topic, 5" limit per speaker) – Alice Kelsey
14. Closed Session, Pursuant to MCL 15.268(1)(h), to Discuss Attorney-Client Privileged Legal Opinion
15. Board Member Comments – Alice Kelsey
16. Adjournment
17. Future Meetings:
 - a. January 16, 2025 @ 2:30 pm – Executive Committee
 - b. March 17, 2025 @ 3:30 pm – Recipient Rights Advisory Committee
 - c. January 20, 2025 @ 4:00 pm – Program Committee
 - d. January 20, 2025 @ 4:30 pm – Finance Committee
 - e. January 20, 2025 @ 5:30 pm – Full Board Meeting



OnPoint Board Finance Committee Agenda

December 16, 2025 @ 4:30 pm

Hamilton Conference Room, 540 Jenner Drive, Allegan MI 49010

- 1) Call to Order – Beth Johnston
- 2) Public Comment (agenda items only, 5 minute limit per speaker)
- 3) Approval of Agenda
- 4) Approval of Minutes
- 5) Review of Written Reports
 - a) Administrative Services Report – Andre Pierre
 - b) Facilities, Information Technology & Human Resources – Andre Pierre
- 6) Action Items
 - a) Motion – to Recommend Board Approval of Voucher Disbursements
 - b) Motion – to Recommend Board Approval of Contracts
- 7) Informational Items
 - a) Financial Reports
- 8) Building Committee
- 9) Finance Committee Member Comments
- 10) Public Comment (any topic, 5 minute limit per speaker)
- 11) Adjournment – Next Meeting January 20, 2026 at 4:30 pm, 540 Jenner Drive, Allegan, MI

Finance Committee: Beth Johnston, Chair; Glen Brookhouse, Vice Chair; Commissioner Mark DeYoung; Krystal Diel, Commissioner Gale Dugan, Alice Kelsey

OnPoint Finance Committee Minutes - DRAFT
Tuesday, November 18, 2025, at 4:30 pm
Hamilton Conference Room, 540 Jenner Drive, Allegan MI 49010

Board Members Present: Glen Brookhouse, Mark DeYoung, Gale Dugan, Beth Johnston & Alice Kelsey

Board Members Absent: Krystal Diel

Staff Members: Mark Witte, Andre Pierre, Nikki McLaughlin

Public Present: None

1. **Call to Order** – Beth Johnston –Chairperson, called the meeting to order at 4:30 pm.
2. **Public Comment** – None
3. **Approval of Agenda**

Moved: Mr. Dugan

Supported: Mr. Brookhouse

Motion carried.

4. Approval of Minutes

Moved: Mr. Brookhouse

Supported: Mr. Dugan

Motion carried.

5. Review of Written Reports:

a. Administrative Report

Mr. Pierre reviewed the administrative report submitted. OnPoint had a very good month and year. Projected to return 1.15 million to LRE with a general fund surplus of \$26,700 to be retained.

b. Facilities & Human Resources

Human Resources – Two policies were revised, approved, posted with staff education taking place. HR continues to work with Rehmann on the supervisory training program and will finalize the draft in October. The team continued work on the climate survey, working with leadership to identify top five priorities. The report was presented to all staff in September. Action plan will be updated on a frequent basis and handed to all staff before all staff meetings.

Implemented a kudos system for good work recognition. Folks 4 Fun organized fall wellness challenge for staff.

Information: 5 New Hire, 1 Separations (1 Voluntary, 0 involuntary) with 9 active postings.

Information Technology – A primary draft of an Artificial Intelligence (AI) policy was completed. This will give guidance for Elios to be implemented by the Health Care Project Manager, Rob Griffith. Implementation date has been moved from December to January to allow for trainings to take place. OnPoint does not utilize the Co-Pilot with 365 at this time, has been disconnected.

Discussion followed about AI and OnPoint's direction.

Facilities – OnPoint is now fully connected to the county, however, data feed was put on pause in September. Update - live feed started in October, project has been completed.

MAT – Nine bids were evaluated, interviews conducted with the selection going to JKB Construction, a regional contractor located in Jenison. Contract language is being finalized. Due to government shut down, there has been a pause for the project due to budget approval needed by HRSA prior to start of project.

6. Action Items:

- a. The Finance Committee recommends that the OnPoint Board approve the October 2025 disbursements totaling \$3,981,296.00.

Moved: Mr. Brookhouse

Supported: Mr. DeYoung

Motion carried.

- b. The Finance Committee recommends that the OnPoint Board approve the following list of provider contracts for fiscal year 2026.

Moved: Mr. DeYoung

Supported: Mr. Brookhouse

Motion carried.

7. Informational Items

a. Financial Reports

Mr. Pierre reviewed the financial statements for September.

Projected \$1,150,844 to be returned to the LRE. General Fund is currently not expecting to return funds to MDHHS with a surplus of \$26,702. CCBHC revenue is currently at a year-to-date surplus of \$427,262.

Balance Sheet – Cashflow is continuing to do well with the surplus of daily visits for CCBHC funding. Increase in cash/cash equivalents as well as investment has an increase from last year to this year due to the investment of funds for CCBHC, PTO and USDA Repair/Replacement funds.

Unrestricted \$3.3 million reflects CCBHC activity.

Income Statement – Operating revenue at the end of the year was at 102% with expenditures at 100%. OnPoint managed revenue and expenses within budget and looks to have a net position of 1 million.

Revenue is running over for HMP capitation as additional enrollments and fewer disenrollments than expected. OnPoint did receive a quality bonus for CCBHC of \$430,000.

Overall expenses are down due to grant staffing levels. Supply/materials are over due to furniture purchase for MAT changes.

Reviewed dashboards.

Mr. Witte commented on the crisis grant opportunity for staff to be available 24/7, getting a live person.

8. Building Committee

See Facilities above.

9. Finance Committee Member Comments

None

10. Public Comment

None

11. **Next Meeting** – December 16, 2025, at 4:30 pm.

12. Adjournment

Moved: Mr. Dugan

Supported: Mr. Brookhouse

Motion carried.

Meeting adjourned at 5:25 pm.

Administrative Services Board Report December 2025

Submitted by Andre Pierre, Chief Administrative Officer
269.569.3238 – APierre@OnPointAllegan.org

FINANCE

This month's packet includes the monthly financial report for October 2025. The Summary Schedule of Revenues and Expenses by Fund Source shows the difference between the revenue received from the Lakeshore Regional Entity (LRE) and the State of Michigan Department of Health and Human Services (MDHHS) and the eligible expenses incurred by OnPoint. These fund sources are cost settled at the end of each year, and any unspent funds are required to be returned to the LRE or MDHHS. We are projecting to return approximately \$202,684 (Medicaid and Healthy Michigan Plan combined) to the LRE and no General Funds to return to MDHHS.

HUMAN RESOURCES

In Human Resources, four policies were approved and rolled out to staff: Workforce Composition and Planning Policy, Employee Engagement Policy, Remote Work Policy and Agreement, and an Individual Credentialing and Recredentialing Policy. Work continued on the development of an OnPoint Employee Handbook, as Human Resources completed a mapping of OnPoint policies to our consulting partner's (Rehmann) employee handbook table of contents to identify gaps. The OnPoint senior leadership team continued to discuss and assign Employee Climate Survey FOCUS Group Action Plan at weekly meetings and the Human Resources team continued to partner with the Rehmann consultant on the development of a Supervisors Training curriculum. Individuals from the Human Resources team continued to sharpen their skills and professional knowledge by attending the following conferences/seminars/trainings: Michigan Council of the Society for Human Resource Management (MISHRM) conference and the Michigan State Police Safety/Active Shooter training. Both engagements covered important current topics affecting Human Resource departments across all industries such as: Employee Management and Safety under duress, Artificial Intelligence, Rewards and Recognition, Retention Practices, and Leadership and Ethics. We expect that these learning opportunities will continue to add value to OnPoint and the workplace experience of its employees. Lastly, as part of continued efforts to promote a positive and healthy workplace culture, The Folks4Fun Employee Activity Committee organized the Great Pumpkin Scavenger Hunt and a door decorating contest.

In the month of October, the Human Resources department did experience some activity in the areas of turnover and internal transitions. The following activity occurred:

New Hires- 3

Separations- 1 (1 voluntary)

Active Posting- 10

INFORMATION TECHNOLOGY

In the area of Information Technology, we continue to work with Allegan County Information Technology (IT) on items in the 2025 project list. During October, there was little activity in the area of technology. With a formal contract in place with Eleos Health, the project officially held a kick-off meeting to cover a quick review of Eleos technology, discuss how success will be measured through goals and KPIs, discuss ROI and Best Practices, and prospective implementation start. Additional meetings are scheduled to finalize the overall project plan and timeline. Rubix IT consulting continues their active support by assisting OnPoint in the completion of ad-hoc reports that must be delivered on time. During the month of October Rubix continued their work on the dashboards, by evaluating additional data.

FACILITIES

In the area of Facilities, we had a relatively calm month with only routine maintenance actions taking place.

We officially began occupancy of the new building on May 5, 2023. We committed no construction draw of funds through the United States Department of Agriculture (USDA) loan and Michigan Economic Development Corporation (MEDC) grant. At this point the project close “punch list” of deliverables has been completed. On Wednesday, October 22nd, 2025, began receiving a live data feed from Allegan County (i.e Courthouse), closing the last outstanding item of this building project. With the last item closed we were able to complete our final construction draw and bring the entire project to a final close.

Interactions with Schley Nelson Architects for the buildout of the MAT area of the building continued as we held a preliminary kick-off meeting with contractor, JKB Construction. This provided an opportunity for key stakeholders to do introductions, review the Construction Schedule, discuss outstanding issues/questions, and discuss the JKB construction process. However, during the month, the Federal Government shutdown froze the flow of HRSA funds for the project, thereby delaying the start. We are still targeting project completion during the first quarter of 2026.

We have been encouraged by all the interactions we are having and feel optimistic about the end deliverables. OnPoint is in the active project launch and review stage and will provide periodic updates to key stakeholders as warranted.

Sincerely,

Andre Pierre
Chief Administrative Officer
December 8, 2025

Finance Committee ACTION REQUEST	Subject:	Voucher Disbursements
	Meeting Date:	December 16, 2025
	Requested By:	Beth Johnston, Finance Committee Chairperson

RECOMMENDED MOTION:

The Finance Committee recommends that the OnPoint Board approve the November, 2025 disbursements totaling \$3,843,005.91.

SUMMARY OF REQUEST/INFORMATION:

<u>Date Issued:</u>	<u>Voucher Number:</u>	<u>Type:</u>	<u>Amount:</u>
November 3, 2025	N/A	Loan Payment	\$21,334.00
November 7, 2025	P1773	Payroll	\$488,444.71
November 14, 2025	V985	Vendor	\$2,126,103.09
November 21, 2025	P1774	Payroll	\$496,029.51
November 28, 2025	V986	Vendor	\$711,094.60

BUDGET/FINANCIAL IMPACT

- These disbursements are part of the approved fiscal year 2026 operating budget for OnPoint.

BY: Nikki McLaughlin, Accounting Manager	DATE: December 16, 2025
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Full Board ACTION REQUEST	Subject:	Contracts
	Meeting Date:	December 16, 2025
	Requested By:	Beth Johnston, Finance Committee Chairperson

RECOMMENDED MOTION:

The Finance Committee recommends that the OnPoint Board approve the following list of provider contracts for fiscal year 2026.

SUMMARY OF REQUEST/INFORMATION:

Provider		Contractual Services
Lutheran Social Services dba Samaritas		SUD Services
Jill Halevan		Independent Facilitator

BUDGET/FINANCIAL IMPACT

The contracted services are part of the fiscal year 2026 operating budget for OnPoint.

BY: Nikki McLaughlin, Accounting Manager	DATE: December 16, 2025
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ONPOINT



Period Ended
October 31, 2025

Preliminary
Monthly Finance
Report

ONPOINT

Summary of Variances and Fluctuations

October 31, 2025

Due to the changes in Certified Community Behavioral Health Clinic (CCBHC) billing effective October 1, 2025, and open data structure and reporting questions with the Michigan Department of Health and Human Services (MDHHS), OnPoint was not able to prepare a monthly report using encounters for cost allocation (the methodology historically used). OnPoint is working with their Electronic Medical Record (EMR) vendor and MDHHS to determine fiscal year 2026 reporting requirements and modify our system to meet both internal and external reporting needs. In the meantime, OnPoint has prepared a draft report enclosed here, using October's actual expenses from our general ledger but allocated across funding sources using September 2025 encounter data from our EMR. We calculated CCBHC revenue using October's actual daily visits provided (both billed and unbilled) from our EMR times our anticipated fiscal year 2026 PPS-1 rate. This methodology reasonably approximates the net surplus or deficit by funding source. There were no significant budget to actual variances for actual October 2025 expenses from our general ledger. As with prior years, we have not included a comparative Statement of Net Position as we finalize closing the prior fiscal year.

ONPOINT

Summary Schedule of Revenues and Expenses by Fund Source

For the Period From October 1, 2025 through October 31, 2025 (Preliminary)

	MDHHS Revenue	Coordination of Benefits	Grant Revenue	Expense	Redirects	Lapse or (Deficit)
Medicaid						
Medicaid - Mental Health	\$ 1,911,927	-	\$ -	\$ (2,094,796)	\$ -	\$ (182,869)
Medicaid - Autism	518,596	-	-	(169,189)	-	349,407
Medicaid - SUD	61,453	-	-	(23,519)	-	37,934
Healthy Michigan Plan - Mental Health	152,239	-	-	(196,800)	-	(44,561)
Healthy Michigan Plan - SUD	90,045	-	-	(47,272)	-	42,773
Medicaid subtotal	<u>\$ 2,734,260</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ (2,531,576)</u>	<u>\$ -</u>	<u>\$ 202,684</u>
CCBHC Demonstration						
CCBHC - Medicaid	713,911	12,563	\$ -	\$ (605,504)	\$ -	\$ 120,970
CCBHC - Healthy MI Plan	229,731	1,555	-	(197,743)	-	33,543
CCBHC - NonMedicaid	-	13,927	-	(127,126)	31,881	(81,318)
CCBHC Subtotal	<u>\$ 943,642</u>	<u>\$ 28,045</u>	<u>\$ -</u>	<u>\$ (930,373)</u>	<u>\$ 31,881</u>	<u>\$ 73,194</u>
General Fund	<u>\$ 142,311</u>	<u>\$ 99</u>	<u>\$ -</u>	<u>\$ (110,529)</u>	<u>\$ (31,881)</u>	<u>\$ -</u>
SUD Treatment Block Grant	<u>\$ -</u>	<u>\$ 999</u>	<u>\$ 36,761</u>	<u>\$ (37,760)</u>	<u>\$ -</u>	<u>\$ -</u>

This financial report is for internal use only. It has not been audited, and no assurance is provided.

ONPOINT

Statement of Revenue, Expenses and Change in Net Position

October 1, 2025 through October 31, 2025

Percent of Year is 8.33%

	Total FY 2026 Budget	YTD Totals 10/31/25	Under/(Over) Budget	Percent of Budget - YTD
Operating revenue				
Medicaid capitation	\$ 30,530,129	\$ 2,491,976	\$ 28,038,153	8.16%
Medicaid settlement	(945,851)	(204,472)	(741,379)	
Healthy Michigan capitation	2,539,271	242,284	2,296,987	9.54%
Healthy Michigan settlement	479,683	1,788	477,895	
CCBHC capitation and supplemental	9,929,384	943,642	8,985,742	9.50%
CCBHC quality bonus payment	267,629	-	267,629	
State General Fund formula funding	1,707,737	142,311	1,565,426	8.33%
State General Fund settlement	-	-	-	
Grants and earned contracts	4,981,627	227,950	4,753,677	4.58%
Local funding	346,095	28,841	317,254	8.33%
Other reimbursements and revenue	608,680	47,704	560,976	7.84%
Total operating revenue	<u>\$ 50,444,385</u>	<u>\$ 3,922,024</u>	<u>\$ 46,522,361</u>	<u>7.77%</u>
Operating expenses				
Salaries and wages	\$ 12,123,863	\$ 1,017,213	\$ 11,106,650	8.39%
Fringe benefits	4,343,434	286,953	4,056,481	6.61%
Supplies and materials	278,347	26,416	251,931	9.49%
Provider Network services	27,690,851	2,179,125	25,511,726	7.87%
Contractual services	4,179,355	214,201	3,965,154	5.13%
Professional development	185,641	17,978	167,663	9.68%
Occupancy	397,566	23,485	374,081	5.91%
Miscellaneous expenses	601,435	31,281	570,154	5.20%
Depreciation	286,121	23,843	262,278	8.33%
Total operating expenses	<u>\$ 50,086,614</u>	<u>\$ 3,820,495</u>	<u>\$ 46,266,119</u>	<u>7.63%</u>
Nonoperating expenses				
Interest expense	118,450	8,779	109,671	7.41%
Change in net position	<u>\$ 239,320</u>	<u>\$ 92,750</u>	<u>\$ 146,570</u>	

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**OnPoint
Recipient Rights Advisory Committee (RRAC) Agenda**

Tuesday, December 16, 2025 at 3:30 pm
Board Room, 540 Jenner Drive, Allegan, MI 49010

1. Call to Order – Glen Brookhouse, Chairperson
2. Public Comment – Agenda Items Only, Subject to 5-Minute Limit Per Person
3. Approval of/Additions to Agenda
4. Approval of Prior Meeting Minutes – September 2025
5. Review ORR Status Report – Kelsey Newsome
6. Review and Approve FY 2025 Annual Report
7. Other Business
8. Public Comment – Any Topic, Subject to 5-Minute Limit Per Person
9. Adjournment, Next Meeting

RRAC members are:

Glen Brookhouse, Chair; Craig VanBeek, Vice Chair;
Gale Dugan, Richard Wiley, Pam Brenner, Kim Bartnick, Jessica Castañeda

2026 Meeting Months: March, June, September, December

Recipient Rights Advisory Committee (RRAC) Minutes - DRAFT
Tuesday, September 16, 2025, at 3:30 PM
Hopkins Conference Room, 540 Jenner Drive, Allegan, MI 49010

Committee Members Present:

Glen Brookhouse, RRAC Chairperson
Craig VanBeek, Committee Member
Jessica Castañeda, Board Member
Richard Wiley, Committee Member

Committee Members Not Present:

Gale Dugan, Board Member
Kim Bartnick, Board Member
Pam Brenner, Board Member

Staff Present:

Kelsey Newsome, Director of Recipient Rights & Customer Services

Other individuals Present: None.

- 1. CALL TO ORDER** ~ RRAC Chairperson Glen Brookhouse meeting called to order at 3:38pm.
- 2. PUBLIC COMMENT** ~ RRAC Chairperson Glen Brookhouse opened an opportunity for public comment. No public comment. Chairperson Glen Brookhouse closed the opportunity for public comment.
- 3. APPROVAL OF ADDITIONS TO AGENDA** ~ A motion by Committee Member Craig VanBeek to approve the agenda. Board Member Jessica Castañeda seconded the motion. The motion was approved by unanimous voice vote.
- 4. APPROVAL OF PRIOR MEETING MINUTES** ~ A motion to approve was made by Committee Member Craig VanBeek to approve both the March 2025 and the June 2025 meeting minutes. Board Member Jessica Castañeda seconded the motion. The motion was approved by unanimous voice vote.
- 5. REVIEW OF ORR STATUS REPORT** ~ Director Kelsey Newsome reviewed the ORR Status Report.
- 6. RRAC EDUCATION** ~ Director Kelsey Newsome reviewed OnPoint Policies 1315 and

1316 and the updates that will be made to these policies because of changes to the following FY26 Contract attachments:

1. C6.3.2.4 Recipient Rights Appeals Process Technical Requirement
2. C6.3.2.3 Recipient Rights Training Technical Requirement

7. OTHER BUSINESS ~

1. The OnPoint FY26 ORR Budget was reviewed. No questions or concerns.
2. RRAC Chairperson appointed Committee Member Craig VanBeek as Vice Chairperson.

8. PUBLIC COMMENT ~ No public comment.

9. ADJOURNMENT, NEXT MEETING ~ Motion to adjourn made by Committee Member Craig VanBeek and supported by Committee Member Richard Wiley. Unanimously approved by a voice vote. Adjourned at 4:00pm.

Respectfully submitted,



Kelsey Newsome
Director of Recipient Rights and Customer Service

**RECIPIENT RIGHTS ADVISORY COMMITTEE (RRAC)
December 2025 STATUS REPORT**

Reporting Period: September - November 2025

Submitted by Kelsey Newsome, LMSW, Recipient Rights Director
knewsome@onpointallegan.org

September - November 2025 Allegations

Abuse I Sexual Abuse	1
Abuse II – Exploitation	3
Abuse II – Nonaccidental Act	1
Abuse II- Unreasonable Force	1
Abuse III	3
Dignity & Respect	4
Disclosure of Confidential Information	2
Family Rights	4
Mental Health Services Suited to Condition	11
Neglect I	1
Neglect II	5
Neglect III	7
Outside ORR Jurisdiction	4
Safe, Sanitary & Humane Treatment Environment	1
Seclusion	1
Video Surveillance	1
Total Allegations	50

FY 25 Timeliness Report:

	No Right Involved/ Out of Jurisdiction (Acknowledgement Letter Only)	<u><30</u> days	<u><60</u> days	<u><90</u> days	<u>>90</u> days	Total
Previously Closed Allegations	9	13	1	119	0	131
Allegations Closed During Reporting Period	1	0	0	43	1 – extended due to Law Enforcement Investigation	45
Open Allegations	N\A	N\A	N\A	9	0	9
Total						196

FY 26 Timeliness Report:

	No Right Involved/ Out of Jurisdiction (Acknowledgement Letter Only)	< 30 days	<60 days	<90 days	>90 days	Total
Allegations Closed During Reporting Period	3	4	1	0	0	8
Open Allegations	0	14	15	N/A	N/A	29
Total						37



OnPoint Board of Directors – Program Committee Meeting Agenda

Tuesday, December 16, 2025 @ 4:00 pm

Board Room, 540 Jenner Drive, Allegan MI 49010

*(To attend virtually via Microsoft Teams: [Click here to join the meeting](#)
or by audio only via telephone: [call 1-616-327-2708](tel:1-616-327-2708), and enter ID 598 536 159#)*

- 1) Call to Order – Jane LaBean, Chairperson
- 2) Public Comment (agenda items only; 5" limit per speaker)
- 3) Approval of Agenda
- 4) Approval of Minutes
- 5) Program Presentation:
 - a) Outpatient Services – Melissa Potvin & Tracy Laing
 - b) Recovery Management Services – Lauren Todaro
- 6) Review of Written Reports
 - a) Chief Operating Officer – Jeana Koerber
 - b) Motion – Approval of 2025 Program Presentation Schedule
- 7) Program Committee Member Comments
- 8) Public Comment (any topic; 5" limit per speaker)
- 9) Adjournment – Next Meeting January 20, 2025 at 4:00 pm, 540 Jenner Drive, Allegan, MI

Program Committee: Jane LaBean, Chairperson; Kim Bartnick, Vice-Chairperson;
Jessica Castañeda; Marcia Kerber; Debra Morse; Karen Stratton

OnPoint Board of Directors
DRAFT Program Committee Minutes
November 18, 2025

Board Members Present: Marcia Kerber; Jane LaBean, Chairperson; Deb Morse; Karen Stratton

Board Members Absent: Kim Bartnick, Vice-Chairperson; Jessica Castañeda

OnPoint Staff Present: Janice August (virtual); Heidi Denton; Geniene Gersh; Rob Griffith (virtual); Meagan Hamilton; Angel Hopkins (virtual); Amy Kettring (virtual); Jeana Koerber; Kelsey Newsome; Matt Plaska; Cathy Potter; Michell Truax (virtual)

Public Present: Stephanie VanDerKooi

- 1) **Call to Order** – Ms. LaBean called the meeting to order at 4:01pm.
- 2) **Public Comment** – No comments from members of the public.
- 3) **Approval of Agenda** – Karen Stratton moved to approve the agenda. Marcia Kerber supported the motion. Motion carried by unanimous consent.
- 4) **Approval of Minutes** – Karen Stratton moved to approve the minutes from the meeting on October 21, 2025. Deb Morse supported the motion. Motion carried by unanimous consent.
- 5) **Program Committee Reports** – Heidi Denton, Housing and Prevention Supervisor, presented on the Homeless Assistance Program. Ms. Denton started by providing an overview of the Homeless Assistance Program, introduced the Housing team, and provided definitions of the different categories of homelessness. Additionally, an overview of OnPoint's current homeless assistance programs, the master lease program, and steps to stability funding were provided. Finally, the challenges the homeless assistance program faces, the fair market rent rates, recent program successes, and number served in 2024 were provided.

Matt Plaska, Director of Quality Innovation, provided the Annual Review and Evaluation of Quality Improvement Activities for FY2025, discussed the Quality Assurance & Performance Improvement Plan for FY2026, and reviewed the Performance and Quality Measures for FY2026.

Jeana Koerber, Chief Operating Officer, shared Eleos will be rolling out towards the end of January 2026, there have been no further updates around the HRSA funds, and there are changes coming to the housing grants that may require reapplying by December 12, 2025.

Cathy Potter, Customer Services Coordinator, shared the number of orientations conducted this past quarter, and reviewed grievance reports. Additionally, Ms. Potter provided an update on Notice of Adverse Benefit Determinations (NABD), including an audit that the LRE conducted that OnPoint received 100% on. Furthermore, community events attended were reviewed as well as upcoming events.

- 6) **Program Committee Member Comments** – The presenters were thanked for their presentations and praised for their work.
- 7) **Public Comment** – No comments from the public.

8) **Adjournment** – Motion by Karen Stratton, supported by Deb Morse to adjourn the meeting. Motion carried by unanimous consent. Meeting adjourned at 4:50pm.

Submitted by,
Meagan Hamilton

Program Committee Board Report December 2025

Submitted by Jeana Koerber, Ph.D., Chief Operating Officer
269-550-6649 – Jkoerber@OnPointallegan.org

Committee Workgroups

Policy Oversight Committee. The policy oversight committee continues to meet monthly and review agency policies. Most recently we have reviewed policies related to self-determination, utilization management and service documentation timelines.

Health and Safety Committee. The health and safety committee is working to update relevant policies and practices for staff. We have been onboarded to the county alert system, RAVE, and will be setting up agency specific notifications that can go to all staff on their agency phones and email. We are also working on ensuring our drill schedule is up-to-date and includes all the necessary drills required for CARF. We continue to work on the facilities emergency response plan (FERP) as well with a draft expected to be reviewed this month.

Program Updates

Organizational/Clinical Workflow Updates. We continue to backfill vacant roles and new roles from the previous fiscal year. We are still looking for two adult outpatient therapist, but our staffing contract with Arbor Circle is helping to ensure clients have access to outpatient services in a timely manner. We are also working to start up our dialectical behavior therapy (DBT) groups at the start of 2026.

We continue to monitor staff expectations but do expect lower utilization of our services due to the holidays and winter weather. The current focus is to ensure staff are using their CRANE calendars for appointments and ensuring documentation is started and completed on time. Our Healthcare Analytics Manager has started at OnPoint so we are excited to have him on board to assist with the creation of dashboards and other tools to help support the clinical work of our teams.

Finally, we are working to update practices and policies for the roll out of Eleos on the clinical side. We have meetings scheduled for the new year with a training date set for the end of January. We are also looking at other tools to increase engagement and ensure we are connecting clients to the resources they need.

MAT updates. The MAT RN and MAT/Med Clinic Supervisor role both remain open positions. We are finding it difficult to recruit an RN to the agency and recently, another RN has resigned from their role. This leaves the agency with only one nurse across all our MAT and med clinic services. We will be partnering with ECS, the company who provides the staffing for our MAT prescribers, to have a nurse come to OnPoint two days a week to ensure continuity of care, particularly for medication administration via injection.

Housing services. The Allegan Community Foundation has agreed to review the requirements for co-chairing the LPB. We will revisit the topic in the new year. Due to changes at the federal level, most of our housing grants are in a competitive bid process. The housing team is working diligently with our state body, the Balance of State, to ensure we are renewing or

submitting new applications to try to preserve the level of housing assistance we currently have. Applications are due to the Balance of State on Friday, December 12th. At the time of this report, we have four applications we need to complete for three grants ending April 30, 2026, and one grant ending November 30, 2026. We have decided not to re-apply for one grant through MISHDA due to the small number of households it supports and the fact that it is unlikely we will be awarded the funding. However, direction is rapidly changing as new information is gathered by the state and passed down to agencies. I will report on the final applications and possible impact on our community at the meeting.

Sincerely,

Jeana Koerber, Ph.D.
Chief Operating Officer
December 8, 2025

2026 ANNUAL PROGRAM COMMITTEE PRESENTATION SCHEDULE

Program Committee meets the 3rd Tuesday each month at 4pm.

MONTH	PRESENTATION TOPIC	PRESENTER(S)
January 20	Corporate Compliance Plan	Diane Bennett
	Risk Management Plan	Jeana Koerber
February 17	Children's Services: ICC with Wraparound, Homebased and Infant Mental Health	Tara Poore, Tracy Monroe & Emma Higgs
March 17	Access, Crisis, and Mental Health Treatment Court	Melissa Potvin, Alison Schuyler, & Dreka Payne
	Evidence Based Practices	Geniene Gersh
April 21	Assertive Community Treatment (ACT)	Lauren Todaro
	Provider Network and Self Determination	Amy Kettring & Mallory Mickevich
May 19	Case Management and Supportive Services	John Eagle & Laura Furey
June 16	Prevention Services	Heidi Denton
	Housing Programs	Heidi Denton
July 21	Medication Clinic Services and MAT	Angel Hopkins and Ashlynn Maneke
	Occupational Therapy	Rebecca DeHart & Brandon Lange
August 18	Peer Teams (Certified Peers, Recovery Coaches, Parent Support Partners)	Peer Group
	Administrative Professionals	Christine Beals
September 15	Utilization Management	Michell Truax
	Autism Program and Children's Supports Coordination Services	Megan Ford
October 20	Supported Employment Services	John Eagle & Charles Wilkinson
November 17	Quality Improvement Plan	Matt Plaska
December 15	Outpatient Services	Melissa Potvin & Tracy Laing
	Recovery Management Services	Lauren Todaro

OnPoint Board of Directors Minutes - DRAFT

Tuesday, November 18, 2025, at 5:30 PM

Board Room, 540 Jenner Drive, Allegan, MI 49010

Board Members Present: Glen Brookhouse; Commissioner Mark DeYoung; Krystal Diel; Commissioner Gale Dugan; Beth Johnston; Alice Kelsey; Marcia Kerber; Jane LaBean; Deb Morse; Karen Stratton

Board Members Absent: Kim Bartnick; Jessica Castañeda

OnPoint Staff Present: Janice August (virtual); Geniene Gersh; Rob Griffith (virtual); Meagan Hamilton; Angel Hopkins (virtual); Amy Kettring (virtual); Jeana Koerber; Kelsey Newsome; Andre Pierre; Matt Plaska; Cathy Potter; Michell Truax (virtual); Mark Witte

Public Present: Nan Lawrence; Stephanie VanDerKooi

1. **Call to Order** – Ms. Kelsey called the meeting to order at 5:31pm.
2. **Pledge of Allegiance** – All present stood to recite the Pledge of Allegiance.
3. **Roll Call** – Ms. Kelsey conducted the roll call with the attendance of board members as documented above. A quorum was established.
4. **Provision for Public Comment** – No comments received.
5. **Approval of Agenda**

Motion: To approve the agenda as presented.

Moved: Glen Brookhouse

Supported: Beth Johnston

Motion carried by common consent.

6. **Consent Agenda** – *All items listed are considered routine and thus will be enacted by one motion.*

- i. Board Meeting (10/21/2025)
- ii. Finance Committee (10/21/2025)
- iii. Program Committee (10/21/2025)
- iv. Executive Committee (10/17/2025)

Motion: To approve the minutes on the consent agenda as presented.

Moved: Commissioner Gale Dugan

Supported: Jane LaBean

Motion carried by common consent.

7. **Program Committee** – Jane LaBean shared that the Program Committee received a presentation on Housing services from Heidi Denton and provided a brief overview, Matt Plaska provided an overview on the Annual Review and Evaluation of Quality Improvement Activities of FY2025 and the FY2026 Quality Improvement Plan. Finally, overviews were provided of the Chief Operation Officer's report and the Customer Services Coordinator's report.

- a. Motion: To approve the FY2026 Quality Assurance & Performance Improvement Plan as recommended by the Program Committee.

Moved: Jane LaBean

Supported: Marcia Kerber

Motion carried by common consent.

8. **Finance Committee Report** – Beth Johnston, Treasurer, shared the Human Resources team has been actively hiring for the various roles posted and the number of positions remaining are in the single digits. Additionally, policies are still being reviewed, the fiber internet line has been connected to County, and the MAT Room construction has been placed on hold due to the government shutdown and still needing HRSA to approve the contractor selected (JKB Construction). Finally, the summary schedule of revenues and expenses by fund source; statement of net position; and statement of revenue, expenses and change in net position were reviewed.

- a. Motion: To approve the October 2025 disbursements totaling \$3,981,296.00 as recommended by the Finance Committee.

Moved: Beth Johnston

Supported: Glen Brookhouse

Motion carried by unanimous roll call vote.

- a. Motion: To approve the list of provider contracts for fiscal year 2026 as recommended by the Finance Committee.

Moved: Beth Johnston

Supported: Jane LaBean

Motion carried by unanimous roll call vote.

9. Recipient Rights Advisory Committee – The committee did not meet this month.

10. Lakeshore Regional Entity (LRE) Updates – Stephanie VanDerKooi, Chief Operating Officer of the LRE, provided an update on LRE matters. Ms. VanDerKooi shared the LRE's board meeting is on November 19th without the work session, on December 10th the LRE's Oversight Policy Board Committee will be meeting at 4pm, and the LRE is continuing as usual until told different with the RFP.

11. Chairperson's/Executive Committee Report – Alice Kelsey shared SNAP benefits have been restored, Mr. Witte's goals have been provided and are to be reviewed, and the 2026 board and committee schedule was reviewed and approved.

- a. Motion: To approve the 2026 Board and Committee Schedule as presented.

Moved: Alice Kelsey

Supported: Beth Johnston

Motion carried by common consent.

12. OnPoint Chief Executive Officer's Report – Mark Witte and Jeana Koerber shared there are Housing grants that will not be auto renewing this year and will require each CMH to apply for the funds by December 12th, with the region needing to submit by January 14th, which will then be awarded based on merit of the region. Additionally, an update on the PIHP RFP and MiPLAN were provided. Also, Mr. Witte shared feedback is welcome on the list of his goals for the year and can be provided to him or Ms. Kelsey. Finally, OnPoint will be participating in the Allegan Christmas Parade on December 5th, and Mr. Witte thanked the board members for their continued service on the board.

13. Provision for Public Comment – No comments received.

14. Board Member Comments – Ms. Johnston reiterated the great work conducted by the Finance team, Commissioner DeYoung shared he enjoyed his time at the CMHA conference, Ms. Stratton wished everyone a happy holiday, Mr. Brookhouse asked the leaders to thank their team members for their work, Ms. Morse shared her appreciation for being able to attend the CMHA conference, Ms. LaBean stated that Mr. Plaska shared a Healthcare Analytics Manager has been hired and she will be on vacation during the December meeting and wished everyone happy holidays, and Ms. Kerber reiterated Mr. Brookhouse's statement.

15. Motion to Adjourn

Moved: Beth Johnston

Supported: Jane LaBean

Meeting adjourned at 6:06pm.

Motion carried by common consent.

Respectfully submitted,

Meagan Hamilton
Executive Assistant

Alice Kelsey
Board Chairperson

Executive Committee Meeting Minutes

November 14, 2025 – 2:30 pm

Location: OnPoint, 540 Jenner Drive, Allegan, MI 49010

Board Members	[X] Alice Kelsey, OnPoint Board Chairperson [X] Glen Brookhouse, OnPoint Board Vice Chairperson [X] Elizabeth Johnston, OnPoint Board Treasurer [] Commissioner Mark DeYoung, OnPoint Board Secretary [X] Commissioner Gale Dugan, OnPoint Board Immediate Past Chairperson
OnPoint Staff	[X] Mark Witte, OnPoint Chief Executive Officer [X] Andre Pierre, OnPoint Chief Administrative Officer
OnPoint Guests	[X] Andrew Brege, OnPoint Chief Legal Counsel

- 1. Call to Order** – Chairperson Kelsey called the meeting to order at 2:35 pm.
- 2. Members Present/Excused** – Commissioner DeYoung reported his absence prior to the meeting and was excused by Chairperson Kelsey. Commissioner Dugan arrived at 2:45 pm.
- 3. Review/Approval of Agenda** – Ms. Johnston moved, and Mr. Brookhouse seconded, that the draft agenda be adopted as presented. All in favor. Motion adopted.
- 4. Review/Approval of Minutes of October 17, 2025 Meeting** – Mr. Brookhouse moved, and Ms. Johnston seconded, that the minutes of October 17, 2025 be approved as presented. All in favor. Motion adopted.
- 5. Updates on Prior Meeting Topics**
 - Planning Discussion – The committee discussed the status of various lawsuits involving MDHHS and discussed desires, parameters and plans for future needs.
 - LRE Update – No news to report.
 - Bid-Out – Mr. Witte noted that the next hearing in the Court of Claims regarding the RFP dispute is scheduled for 12/8/2025 in Lansing. Mr. Witte intends to attend that hearing.
 - MiPLAN – Mr. Witte reported that there are now 10 CMH's that have joined the MI PLAN group that put forward a bid on PIHP RFP. Three more CMHs are pending. The next board meeting for MI PLAN is on 1/23/2026 in Lansing.
 - MAT Room Buildout – Mr. Witte reported that OnPoint's request for final approval of the MAT room build-out is still pending. We hope that the end of the federal shut-down will mean that approval will be provided very soon so construction can begin.
- 6. Compliance Update** – No report today. Mr. Witte provided a recap of last month's decision and a plan to bring draft bylaws revisions next month that would put board compliance committee duties under the auspices of the Executive Committee.
- 7. Chief Executive Officer Items**
 - Review Key Board Tasks by Month
 - October carryover:
 - Approve Quality Improvement Plan – via Program Committee to Full Board
 - November tasks:
 - Approve 2026 Board Meeting Schedule and Committee Assignments via Executive Committee and then by the full Board.
 - One slight revision will be made to document Pastor VanBeek as the vice-chair of the RRAC. Otherwise no concerns.
 - Receive CEO Year-End summary of results of annual (Oct to Sept) plan and budget goals and objectives, per CEO contract requirement.

- Mr. Witte shared a memo with the committee. The committee requested that the summary be provided to the full board on Tuesday and that comments be solicited for the Executive Committee's use at their December meeting.

iii. Receive quarterly Customer Services report via Program Committee.

- b. The committee reviewed the Board meeting packet. No issues or concerns identified.
- c. For information, Mr. Witte shared that the federal shut-down resolution restored funding for SNAP benefits through a "Continuing Resolution" that will continue through 1/30/2026. This has been an issue that generated significant community concern.

8. Discussion Items Requested by Members – Nothing requested.

9. Next Meeting Date/Time

- a. Friday, December 12, 2025 at 2:30 pm.

10. Adjournment – Commissioner Dugan moved, and Mr. Brookhouse seconded, that the meeting be adjourned. All in favor. Motion adopted. Meeting adjourned at approximately 4:40 pm.

Submitted by Mark Witte

11/14/2025

Chief Executive Officer Report for December 2025

Submitted by Mark Witte, Chief Executive Officer
269-615-4893 – mwitte@onpointallegan.org

AGENCY

Building – The federal government shutdown that began 10/1/2025 ended on 11/12/2025. Following a brief time for review, our request to initiate construction for building out the “MAT” room was processed and approved. We have been in the process of finalizing contract language with the builder, as you will soon hear through the Finance/Building Committee. It’s good to be back underway, though we have lost significant time on the three-month project we hoped to have completed by the end of calendar year 2025.

BOARD

Opening/Opportunity – At last month’s meeting, board member Jane LaBean indicated her intent to complete her term on 3/31/26 but not seek reappointment. With the gracious advance notice of that plan, we have the chance to seek a new board member from the community. Please assist by putting the word out as you have the opportunity so we can stay at full strength!

COMMUNITY

Festivals and Events – OnPoint board and staff and board members were invited to participate by walking in the Allegan Christmas Parade on 12/5/2025 at 7 pm, an event sponsored by Allegan’s Fraternal Order of Eagles #2315.

Legislators to Receive Board Packets – Starting this month, I’ve begun to share our board agenda, minutes and my report to you with our nine (9) Allegan County legislators. Along with that, I’ve invited them to join us when they can – and we’ll make invitations on top of that as well. It’s a small step of advocacy that we hope will support improved awareness of our issues and needs.

REGION

Lakeshore Regional Entity – There is no news as of the date of this report on the LRE’s dispute with the state. The status is the same as reported last month.

STATE

CMHA Winter Conference – CMHA’s winter conference is scheduled for February 3 and 4 (with pre-conference options on February 2) at the Radisson in Kalamazoo. Board members are welcome to attend; you should have received an invitation to do so from Ms. Hamilton who can assist with registration if you are interested.

State RFP for PIHP Functions – Responses to the RFP are currently in review status by MDHHS. Of course, the lawsuit filed in the Court of Claims, is proceeding. I reported last month that an order from the 10/9/25 hearing was issued late on 11/14/25. According to a summary provided by CMHA:

“The Court determined that (1) MDHHS has the unilateral authority to shift to a competitive procurement model for Medicaid behavioral health services; and (2) MDHHS can reduce the number of regions. The Court also said that it could not issue a final decision in the case because the RFP may violate Michigan law in assigning functions to

PIHPs that belong to local CMHs, and in not funding CMHs so that they can fulfill their statutory obligations. The lawsuit will continue and will likely focus on these areas.”

Since the 11/14/25 order was issued, the court has combined this case with one filed by a separate group of CMH's on slightly different grounds. The next hearing – combining both cases – will be held on 12/8/25 in Lansing and 12/9/2025 in Grand Rapids. I plan to attend both and will update the board as soon as information warrants.

Of course, a lot is at stake. The court must resolve the apparent conflict between the specific terms of the RFP (one of which is the elimination of all managed care functions from a PIHPs contractors) and the plain language of the Michigan Mental Health Code that specifies that some of those managed care functions are the responsibility of CMHs. The court has notified MDHHS that it would prefer to have MDHHS make an amendment to the RFP rather than have the court rule on it.

I shared my personal speculation on 10/15/25 about what might happen next if the state desired to halt the need for further litigation:

- (1) MDHHS could revise and reissue the RFP, changing the parts that conflict with the Mental Health Code; or
- (2) MDHHS could work with the legislature to revise the Mental Health Code to remove the language of MCL 330.1206(1) – though this might boomerang on MDHHS if the legislature instead were to strengthen the language to require greater opportunities for CMHs; or
- (3) MDHHS could withdraw the RFP and enter into planning/negotiations with CMHs (as they have in the past) to achieve the real objectives they feel they need to achieve with the support of CMHs.

To date, none of these steps appear to have happened, so the 12/8 and 12/9/25 hearings will proceed.

MiPLAN – Thank you for voting to join MiPLAN on 10/6/25 as part of an effort to preserve a measure of public management of CMH services. MiPLAN submitted a contingency bid on the contested MDHHS RFP for PIHP functions. If the state does not withdraw or modify the RFP, we have heard through CMHA that MDHHS will award PIHP contracts in mid-December. We hope that MiPLAN will be among the entities receiving an award. As of 12/03/25, 14 of Michigan's 46 CMH's (representing 22 of Michigan's 83 counties) have joined MiPLAN:

1. Barry County CMH
2. CEI (Clinton/Eaton/Ingham)
3. CMH for Central Michigan (Osceola, Clare, Gladwin, Mecosta, Isabella & Midland)
4. Lifeways (Jackson/Hillsdale)
5. Monroe County CMH
6. OnPoint (Allegan)
7. Pines Behavioral Health (Branch)
8. Pivotal (St. Joseph)
9. Riverwood Center (Berrien)
10. Sanilac County CMH
11. Shiawassee Health & Wellness (Shiawassee)
12. Summit Pointe (Calhoun)
13. VanBuren County CMH
14. Woodlands (Cass)

NATION

Federal Budget for FY2026 – Despite the October 1 federal shut-down and agreement to continue funding through 1/30/26, there is actually still no FY2026 budget. What was passed to re-open the government was a “Continuing Resolution” that provided funding at the same level as the FY2025 budget until 1/30/2026. We are delighted – as noted above – that we can now proceed with the build out of the MAT room.

The shut-down was accomplished through a commitment between the parties to address the unresolved matter of extending federal tax credits to subsidize people who use the Affordable Care Act to obtain their health insurance coverage.

This is relevant to OnPoint in a very direct way. People who are unable to afford health insurance may choose to become uninsured if federal tax credits are not available. If a substantial number of uninsured Allegan County residents seek care through OnPoint, we would be required to meet those needs through either (1) CCBHC funding or (2) state General Funds (GF) if the need is for services not covered by the CCBHC program.

GF (General Funds) are not sufficient to meet that kind of need. GF was reduced by 75% when Michigan, under the Snyder administration, opted to invest CMH GF in expanding access to insurance through the Affordable Care Act. A Senate Fiscal Agency analysis from 2013 summarizes the thinking:

“The State provides \$274.1 million to local CMH boards to cover the low-income population that is not eligible for Medicaid and also to pay for non-Medicaid covered services. The Snyder Administration has estimated that \$203.9 million of that \$274.1 million is spent for Medicaid covered services for the population that would be eligible for Medicaid expansion. Therefore, instead of that \$203.9 million being a 100% State cost, it would become a 100% Federal cost, resulting in full-year savings of \$203.9 million GF/GP.”

Source:<https://sfa.senate.michigan.gov/Publications/Issues/MedicaidExpansion/MedicaidExpansionProposal.pdf>

It is logical to presume, then, that if a substantial number of Allegan residents become uninsured once again and need CMH services supported by general funds, this can only be feasible if the state increases general funds to meet any increased GF expenses. OnPoint’s challenge is we are required to manage GF so that it is available for all 12 months of the year. Additionally, it must be prioritized for the care of those with the most extreme needs. There is no external fund that backs up CMHs in the event of excess GF expenditures. Any GF remaining at the end of a year is returned to the state. The risk of overspending GF and/or being unable to meet an extreme/expensive is what historically led to the use of waiting lists for lower intensity services. This practice could return, though it would be disappointingly inconsistent with the “Caring for All” commitment that OnPoint has been able to maintain for the past few years.

Systematic Alien Verification for Entitlements (SAVE) in Housing Grants – We received this notice in November:

“For the 2025-26 grant year, the U.S. Department of Housing and Urban Development (HUD) is requiring that a new citizenship verification provision be added to ESG grant agreements. This new provision requires both the Michigan State Housing Development Authority (MSHDA) and its ESG Grantees, Fiduciaries, and Subgrantees (Grantees) to:

“...use the Systematic Alien Verification for Entitlements (SAVE), or an equivalent verification system approved by the Federal government, to prevent any Federal public

benefit from being provided to an ineligible alien who entered the United States illegally or is otherwise unlawfully present in the United States.”

“MSHDA is aware that the required use of the SAVE system for this purpose presents significant challenges for most Grantees both in terms of system access and day-to-day operations. Additionally, while the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), the statute commonly relied on for SAVE verification requirements, does contain certain exceptions for non-profit organizations, the new HUD requirement does not appear to rely on the PRWORA or to incorporate its listed exceptions.”

“MSHDA anticipates further guidance on this issue from HUD in the coming months and will promptly pass on any new information as it becomes available. In the meantime, MSHDA recognizes that most Grantees do not have access to SAVE and will not be able to comply with this requirement until further guidance is issued by HUD.”

Submitted by Mark Witte

Chief Executive Officer

December 5, 2025