



# COC REQUIREMENTS

Regional Team Training #1: June 09, 2022

# Housekeeping

- A recording of the training and the slides will be sent to all registered participant.
- You should be hearing audio by now! Let us know in the Chat box if you can't and someone will help you.
- Audio is available through your computer speakers.
- To join the webinar via the phone, please call in using:  
Phone Number: 1-415-655-0002  
Access code: 2422 288 6635
- Please type your questions in the Chat box.

# Welcome and Introductions

- East Coast Presenters

- Alissa Parrish (she/her) - ICF
- Whitney Patterson (she/her) - Abt Associates
- Michael Thomas (he/him) - ICF
- Thuan Huynh (he/him) - Abt Associates

- West Coast Presenters

- Alissa Parrish (she/her) - ICF
- Ashley Barker Tolman Shuler (she/her) - Cloudburst
- Dusty Olson (she/her) Abt Associates
- Gillian Morshedi (she/her) - Homebase

- Technical Support - Trew Crocker (she/her) - Abt Associates

# Agenda and Objectives

By the end of the training you will understand:

- The CoC interim rule
- Requirements of a CoC Board
- Requirements of a CoC - Programs, Planning, Data Management, & Funding
- CoC requirements for Consultation and Collaboration



CONTEXT

# Poll

What is your role in the CoC? Select all that applies.

- A. Collaborative Applicant
- B. CoC Board member
- C. CoC member
- D. HMIS Lead
- E. Service Provider agency - CoC Funded
- F. Service Provider agency - non-CoC funded
- G. Other - Please specify in the chat



# Poll

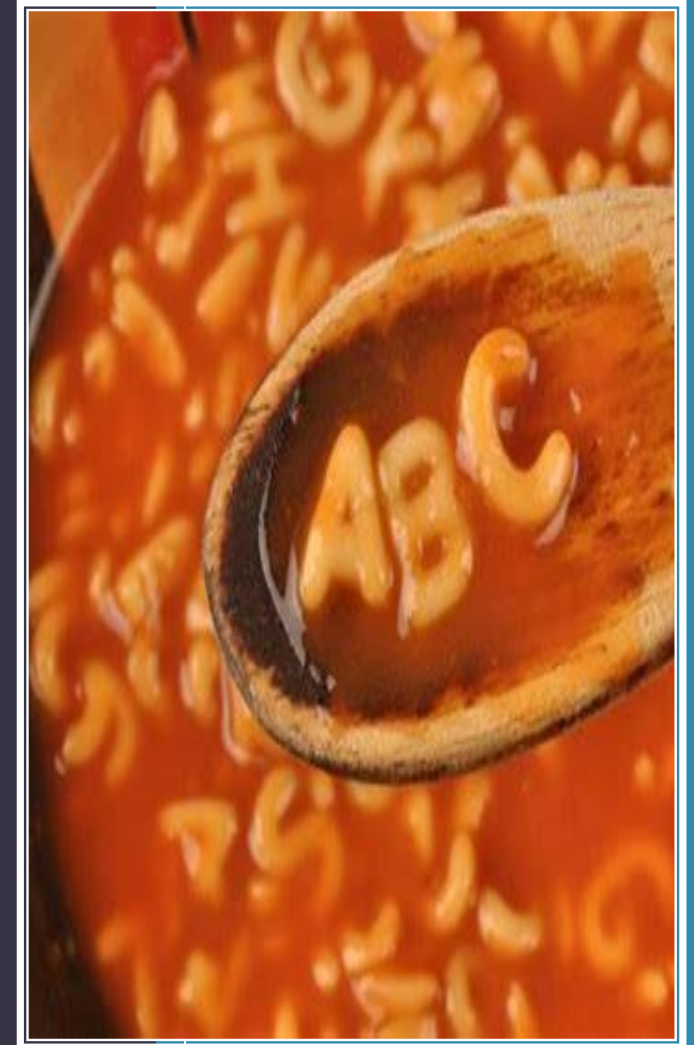
How much experience do you have with the CoC Program?

- A. 0 - 1 year
- B. 1 - 2 years
- C. 2 - 3 years
- D. 3+ years



# HUD's Acronyms

- Department of Housing and Urban Development- **HUD**
- Homeless Emergency Assistance and Rapid Transition to Housing Act- **HEARTH** Act
- Continuum of Care- **CoC**
- Homeless Management Information System- **HMIS**
- Emergency Solutions Grant- **ESG**
- Point-In-Time Count- **PIT**
- Housing Inventory Count- **HIC**
- Notice of Funding Opportunity- **NOFO**
- Youth Homelessness Demonstration Program- **YHDP**
- Transitional Housing - **TH**
- Rapid Re-housing - **RRH**
- Permanent Supportive Housing - **PSH**





# History of CoC Regulations

- McKinney-Vento Act of 1987- First major federal legislative response to homelessness
- Homeless Emergency Assistance & Rapid Transition to Housing (HEARTH) Act of 2009- Amended the McKinney-Vento Act.
- CoC Program Interim Rule- published July 2012- Implemented the HEARTH Act
  - Establishes regulations for the CoC Program
  - Applies to all new/renewal projects in the FY 2012 funding competition and thereafter
- *HUD often often establish policies and strategies through the annual Notice of Funding Opportunity (NOFO)*



# Purpose of the CoC Program

- Promote community-wide commitment to the goal of ending homelessness
- Provide funding for efforts by nonprofit providers, States, and local governments to re-house homeless individuals and families rapidly while minimizing the trauma and dislocation caused to homeless individuals, families, and communities as a consequence of homelessness
- Promote access to and effective use of mainstream programs by homeless individuals and families
- Optimize self-sufficiency among individuals and families experiencing homelessness

# What is a CoC?

**The CoC Program interim rule (578.5) says:**

*Representatives from relevant organizations within a geographic area shall establish a CoC for the geographic area to carry out the duties of this part.*

**What are Relevant Organizations?**

*...non-profit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons.*

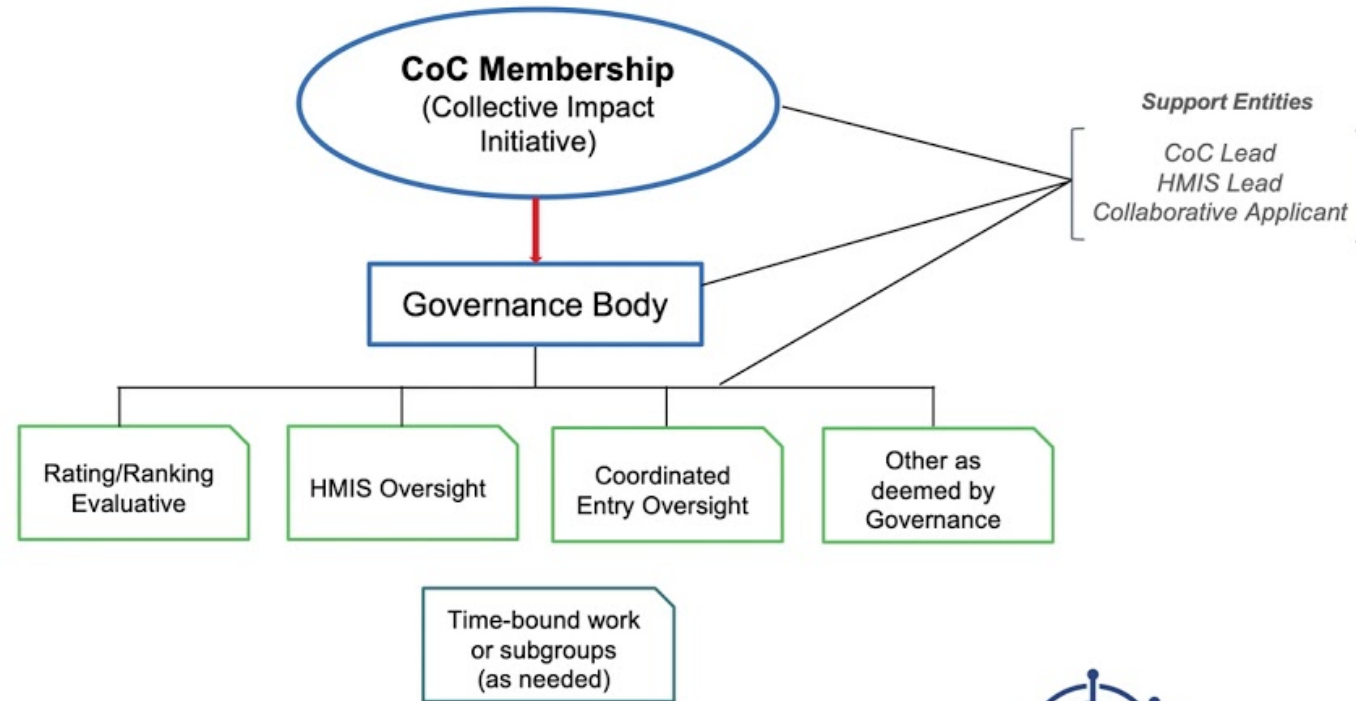
**The CoC is the convening and planning body for a set geographic area responsible for carrying out and implementing the requirements in the Interim Rule.**

# CoC Responsibilities - In General

- Charged with designing a local “system” to assist sheltered and unsheltered people experiencing homelessness and providing the services necessary to help them access housing and obtain long-term stability
- Promote community-wide planning and strategic use of resources to address homelessness
- Enhance coordination and integration with mainstream resources and other programs targeted to people experiencing homelessness
- Improve data collection and performance measurement



# CoC's Example Organizational Structure



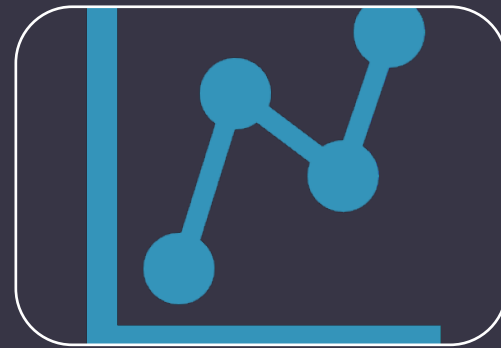
# CoC Requirements



Operations



System  
Planning



Data  
Management



CoC Funding  
Application



# CoC OPERATIONS

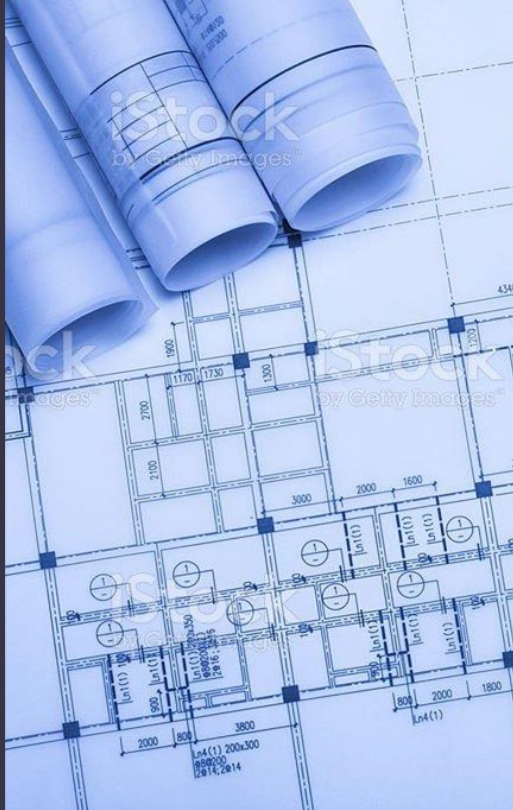
# Membership and Meetings

- Hold at least semi-annual membership meetings
- Issue a public invitation for new members from within the CoC's geographic area at least annually
- From slide 7 - Representatives from relevant organizations within a CoC's geographic area
  - include nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans and homeless and formerly homeless individuals



# System Operations

- Adopt and follow a written process to select a board to act on behalf of the Continuum of Care. Process must be reviewed, updated, and approved by the CoC at least once every 5 years
- Appoint additional committees, subcommittees, or work groups
- In consultation with the collaborative applicant and the HMIS Lead, develop, follow, and update annually a governance charter, which will include all procedures and policies needed to comply with the Interim Rule



# The Governance Charter

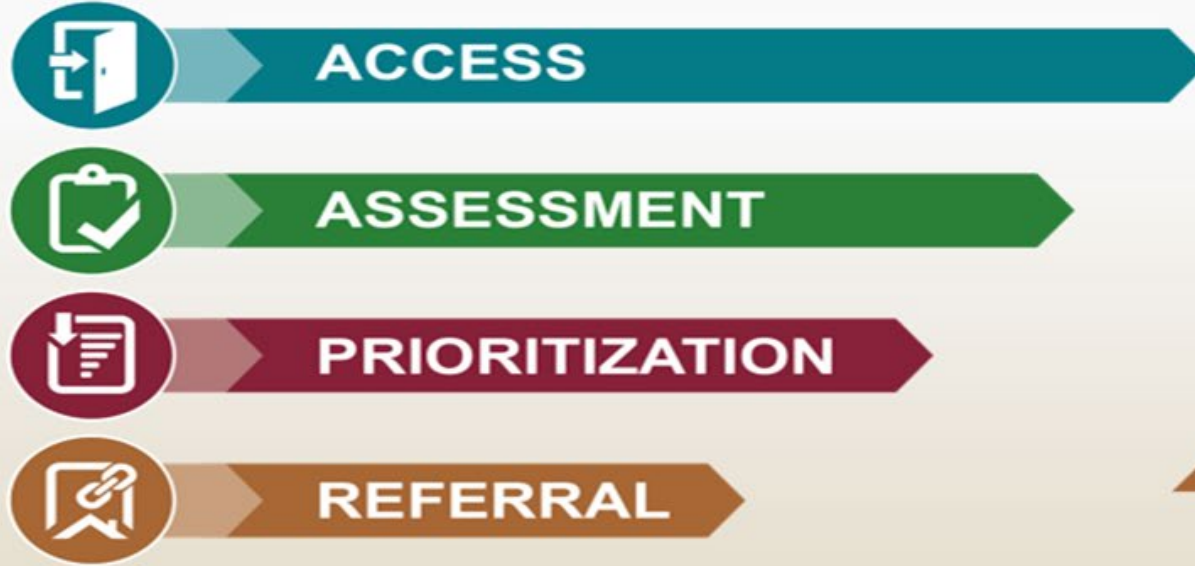
- Details the functions of the CoC board, the CoC's committee structure and roles, staff roles, and the process for amending the charter.
- Think of the Governance Charter as the blueprint for how the CoC works.
- Governance charter must include:
  - Policies and procedures to carry out CoC responsibilities (directly or by reference).
  - Code of conduct
  - Conflict of Interest/Recusal process for Board members

# Coordinated Entry

- CoC must establish and operate a Coordinated Entry (CE) system, in consultation with ESG recipient(s):
  - Must provide an initial, comprehensive assessment of needs of individuals/families requesting assistance
  - Must cover the full CoC geographic area
  - Must be accessible and well-advertised to individuals/families seeking assistance

[17-01CPDN.PDF \(hud.gov\)](#)

# CE: 4 Core Elements



# CE: 4 Core Elements

- 1. Access-** CoCs establish a centralized **access** point or adopt a “no wrong door” approach to housing for all in need. CoC’s should provide outreach to individuals and ensure that access points are equitably distributed throughout the CoC’s geographic region to promote easy and timely access. The CE process must offer the same assessment approach at all access points and all access points must be usable by all people who may be experiencing homelessness.
- 2. Assessment-** CE staff complete an **assessment** process to gather information on individual household’s strengths, needs, preferences, and barriers they face to regaining housing. CoCs must adopt one or more standardized assessment tool(s).
- 3. Prioritization-** A CoC follows established written policies and procedures to **prioritize** households based on level of vulnerability and need. Prioritization policies should reflect the needs of the community to house the most vulnerable and address inequities.
- 4. Referral-** Based on the assessment and prioritization, CE staff then make a **referral** to appropriate and available housing and supportive services

# Written Standards for CoC Assistance

- CoC must work with the ESG recipient(s) to develop written standards for providing CoC assistance:  
*Standards of Administration of Assistance*
  - Eligibility policies and procedures
  - Determining and prioritizing eligible persons for TH, RRH, and PSH resources (consistent with coordinated assessment protocols)
  - Determining levels of RRH assistance and participant rent contribution (across projects)
  - Additional standards for designated high-performing community (HPC)

# Performance Expectations and Monitoring



- Consult with recipients and subrecipients to establish performance targets appropriate for population and program type
- CoC's are required to monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers
- HUD monitors CoC recipients and subrecipients
- CoC planning grants can be used for the cost of monitoring recipients and subrecipients and enforcing compliance with program requirements

# Useful Tools for Monitoring

- Annual Performance Reports (APR)
- Coordinated entry enrollment monitoring
- Homeless Management Information System (HMIS) federal and local data elements
- Align/coordinate monitoring practices across public and private funders
- Site Visits
- Participant feedback
- Financial audits



# Record Keeping

- In general, recipients and subrecipients must establish and maintain standard operating procedures for ensuring that CoC program funds are used in accordance with the requirements and must establish and maintain sufficient records to enable HUD to determine whether recipients and subrecipients are meeting the requirements



# Record Keeping

CoC  
Records

UFA  
Records

Homelessness  
Status

At Risk of  
Homelessness Status

Records of Reasonable Belief  
of Imminent Threat of Harm

Annual  
Income

Program Participant  
Records

Housing  
Standards

Services  
Provided

Match

Conflict of  
Interest

Homeless  
Participation

Faith-based  
Activities

Affirmatively Furthering  
Fair Housing

Other Federal  
Requirements

Subrecipients  
and Contractors

# Record Keeping

- Continuum of Care Records - Each collaborative applicant must keep the following documentation related to establishing and operating a CoC:
  - Evidence that the Board selected by the CoC meets the requirements of the Interim Rule
  - Evidence that the Continuum has been established and operated, including published agendas and meeting minutes, an approved Governance Charter that is reviewed and updated annually, a written process for selecting a board that is reviewed and updated at least once every 5 years, evidence required for designating a single HMIS for the Continuum, and monitoring reports of recipients and subrecipients;
  - Evidence that the Continuum has prepared the application for funds, including the designation of the eligible applicant to be the collaborative applicant.



# SYSTEM PLANNING

# Point-in-Time Count

- Plan and conduct point-in-time (PIT) count on a single night in January
- Sheltered (annual) and unsheltered (biennial - odd numbered years)



# Annual System Gaps Analysis

- Conduct an annual gaps analysis of the homeless needs and services available within the geographic area

# Coordination of System Services


- Coordinating and implementing a comprehensive system to address the needs of the homeless population and subpopulations and persons experiencing a housing crisis within the CoC

# ESG Consultation

- Plan for allocation of ESG program funds
- Report on and evaluate performance of ESG recipients/subrecipients
- Key Elements of coordination:
  - Centralized/coordinated assessment
  - Consolidated Plan homelessness strategy and goals
  - Allocation of ESG funding
  - ESG performance standards
  - ESG subrecipient participation in HMIS
  - ESG and CoC Program written standards

## CAPER

- ESG Consolidated Annual Performance & Evaluation Report (CAPER)
- Provide the information required to complete the Consolidated Plan(s) within the CoC



# DATA MANAGEMENT



# Homeless Management Information System (HMIS)

- HMIS is a computer database used to collect client and project information.
- HMIS data is aggregated to allow for data analysis across the entire system of services.
- HMIS data is used to allocate resources, assess program and project performance, and set policy across homeless crisis response systems.
- Each CoC is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards.
- The CoC is ultimately responsible for the HMIS and must ensure the Lead is meeting HUD requirements.



# Designation of HMIS

The CoC must designate:

- A single HMIS system for geographic area
- An HMIS Lead
  - Single eligible applicant to manage the HMIS
  - Must be formalized through a written agreement
  - Only HMIS Leads may use grant funds for an HMIS component
    - to lease a structure in which the HMIS is operated
    - to operate a structure in which the HMIS is operated

# HMIS Standards

Established by HUD, the U.S. Department of Health and Human Services (HHS), and the U.S. Department of Veterans Affairs (VA) to allow for standardized data collection on homeless individuals and families across systems.

[FY 2022 HMIS Data Standards Data Dictionary - Version 1.2](https://files.hudexchange.info/resources/documents/FY-2022-HMIS-Data-Dictionary.pdf)  
<https://files.hudexchange.info/resources/documents/FY-2022-HMIS-Data-Dictionary.pdf>

[FY 2022 HMIS Data Standards Manual - Version 1.3](https://files.hudexchange.info/resources/documents/FY-2022-HMIS-Data-Standards-Manual.pdf)  
<https://files.hudexchange.info/resources/documents/FY-2022-HMIS-Data-Standards-Manual.pdf>

# HMIS Participation and Compliance

- The CoC is responsible for reviewing, revising, and approving a privacy plan, security plan, and data quality plan for the HMIS and ensuring consistent participation of recipients and subrecipients in the HMIS.
- The CoC and the HMIS Lead work together to establish, support, and manage the HMIS in a manner that meets HUD's standards for data quality, privacy, and security;
- HMIS Lead develops & monitors Policies and Procedures for organizations participating in HMIS
- The Lead enters into written HMIS End User agreements with each organization that participates in and contributes data to the HMIS



# Federal Reporting Requirements

- SPM - System Performance Measures
  - HUD developed seven system-level performance measures to help communities gauge their progress in preventing and ending homelessness. The purpose of these measures is to provide a more complete picture of how well a community is preventing and ending homelessness.
- LSA - Longitudinal Systems Analysis
  - The LSA report provides HUD and CoCs with critical information about how people experiencing homelessness use their system of care. The data contains community-level information on people and households served by continuum projects over the course of one year.
- PIT - Point-in-Time Count
  - The Point-in-Time (PIT) count is a count of sheltered and unsheltered people experiencing homelessness on a single night in January.
- HIC - Housing Inventory Count
  - The Housing Inventory Count (HIC) is a point-in-time inventory of provider programs within a Continuum of Care that provide beds and units dedicated to serve people experiencing homelessness categorized by five Program Types: Emergency Shelter; Transitional Housing; Rapid Re-housing; Safe Haven; and Permanent Supportive Housing.

System Performance Measures - HUD Exchange

<https://www.hudexchange.info/programs/coc/system-performance-measures/#guidance>

Longitudinal Systems Analysis (LSA) - HUD Exchange

<https://www.hudexchange.info/homelessness-assistance/LSA/>

Point-in-Time Count and Housing Inventory Count - HUD Exchange

<https://www.hudexchange.info/programs/hdx/pit-hic/>

# System-Level Performance Measures: Equity

- Equity considerations are not in the HEARTH Act but have been implemented through the NOFO process.
- HUD is working to center racial equity in services for homeless and at-risk populations and is requiring CoC's to examine the issue and to implement solutions
- Current homelessness stems in large part from policies that incentivized discrimination.
- Because of this, persons of color are disproportionately represented among homeless and at-risk populations.

<https://www.hudexchange.info/trainings/courses/partnering-with-persons-with-lived-experience-lessons-learned-webinar/>



# COC FUNDING APPLICATION



# CoC Program NOFO

- Each year, HUD makes CoC Program funds available through a Notice of Funding Opportunity (NOFO):
  - Funding for eligible housing and service projects.
  - Funding for CoC planning
- Collaborative Applicant submits CoC Consolidated Application as part of the competition



# Application for CoC NOFO Funds

## CoC responsibilities:

- Set funding priorities
- Facilitate collaborative process for development of applications
- Approve annual submission of applications
- Designate an eligible applicant as the Collaborative Applicant to apply on the CoC's behalf

# Collaborative Applicant

Responsibilities of the collaborative applicant:

- Prepares and submit the collaborative application to HUD
- Applies for the planning grant on behalf of the CoC
- Participates in the development of the governance charter

# COLLABORATIVE APPLICANT'S RELATIONSHIP TO THE COC

- Acts on behalf of the CoC when applying to HUD for grants
- All application activities and preparation may be conducted by staff of the CoC or the CA
- All responsibilities assigned to the Collaborative Applicant must be documented in the CoC's Governance Charter
- Coc must approve before the entire consolidated application is submitted by the Collaborative Applicant
- The CoC retains its duties related to planning and prioritizing need

# Rating and Ranking Process

- Project applications submitted to the CoC as part of the CoC Consolidated Application must be reviewed and either accepted and ranked, approved, or rejected by the CoC.
- CoCs use objective, performance-based scoring criteria and selection priorities that are approved by the CoC to determine the extent to which each project addresses HUD's policy priorities
- CoCs can reallocate funds to new projects whenever reallocation would improve outcomes and reduce homelessness
- CoCs must publicly post the written procedures that describe the project-level review and ranking process

[CoC Program Project Rating and Ranking Tool - HUD Exchange](https://www.hudexchange.info/resource/5292/project-rating-and-ranking-tool/)  
<https://www.hudexchange.info/resource/5292/project-rating-and-ranking-tool/>



# Questions?



# Training #2: CoC Roles and Responsibilities

Wednesday, June 15 from 3:30pm – 5:00pm ET

<https://abtassociates.webex.com/abtassociates/j.php?RGID=r81c7a56177006abbc99f4fda428591ba>

OR

Thursday, June 16 from 10:00am – 11:30am ET

<https://abtassociates.webex.com/abtassociates/j.php?RGID=r01b9dc3dada7b1dc99b1e4e9f5617cd0>



Thank  
You