COC ROLES AND RESPONSIBILITIES

Regional Team Training #2: June 15 & 16, 2022

Housekeeping

- A recording of the training and the slides will be sent to all registered participant.
- <u>You should be hearing audio by now!</u> 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 281 1439~~

Please type your questions in the Chat box.

Welcome and Introductions

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

- CoC Governing Board
- Collaborative Applicant
- HMIS Lead
- CoC Membership and Committees
- Best Practices
- CoC Resources

CoC Roles
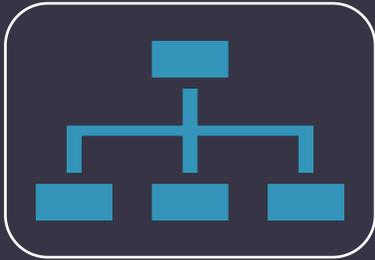
Governing Board

Collaborative Applicant
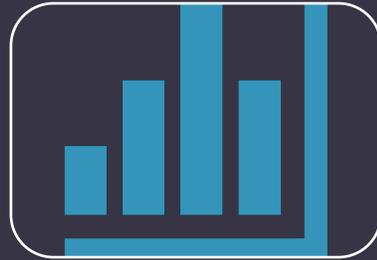
HMIS Lead

Membership
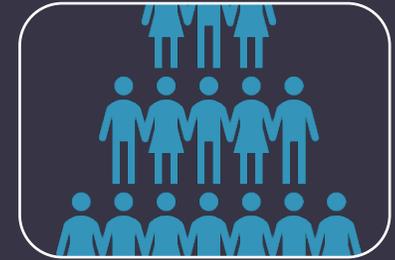
CoC Committees

CoC Staff

Persons with Lived Experience

GOVERNING BOARD

CoC Board- In General

- Must be established by CoC to act on its behalf.
- What the CoC means by "on its behalf" must be specified in the CoC governance charter.
  - The Board has no responsibilities except those designated and/or authorized in the governance charter
- The Board is a subset of the CoC. Part of the larger whole, which is meant to be representative for all.
- HUD does not prescribe how the responsibilities of the CoC are carried out

CoC Board - Responsibilities

The CoC Board is the main decision-making body for the CoC

- Oversees all the work of the CoC
  - Governs, but much of the work happens through Committees/Workgroups
- Approves written standards for CoC/ESG programs
- Approves ranked list of CoC project applications
- Approves CoC policy and procedures for coordinated entry
- Establishes Committees and workgroups
- Sets CoC goals and/or priorities
  - Committees will create the targets to achieve the goal

CoC Board - Selection of Members

- Must be representative of relevant organizations and of projects serving homeless subpopulations
- Must include at least one individual who is currently or has previously experienced homelessness
- Members must be selected using a process defined in writing, including term limits
- Written process must be reviewed, updated and approved by the CoC at least once every 5 years
- Representation should be inclusive and consistent with community demographics and population of persons experiencing homelessness within the community

Annual Governance Charter Review

Governance charter must be:

- Developed in consultation with the Collaborative Applicant and HMIS Lead
- Reviewed and updated annually
- Adopted by full CoC membership at least every five years

Evaluation of System

- Homeless Response
- Coordinated Entry
- Collaborative Applicant
- HMIS Software Solution
- HMIS Lead

Conflict of Interest

- Members must follow code of conduct, conflict of interest, and recusal process

- Conflict of interest should be outlined in the Governance Charter

- Providers who sit on the CoC board should recuse themselves from the CoC funding decisions and NOFO process

- All board members should sign a conflict of interest policy outlining these expectations, declaring any and all conflicts

COLLABORATIVE APPLICANT

Collaborative Applicant

- Unless granted additional responsibilities by the CoC that are documented in the governance charter, the collaborative applicant's sole responsibility is to:
  - Compile and submit the annual application to HUD for CoC Program funds
  - Apply for CoC Planning funds on behalf of the CoC
- Can serve as lead agency for staff support of all CoC functions

CoC Application

Responsibilities of the collaborative applicant:

- Prepares and submit the CoC Consolidated Application to HUD as part of the competition

- Applies for the planning grant on behalf of the CoC.

Planning Grant

- The collaborative applicant is the only applicant permitted to apply for CoC planning funds. May be used for:

  - Designing and carrying out the collaborative process for the application to HUD
  - Preparing and submitting the CoC's application for CoC Program funds
  - Determining the geographic area the CoC will serve
  - Evaluating outcomes of projects funded through CoC and ESG program grants within the geographic area
  - Participating in the Consolidated Plan(s) process of the jurisdictions within the geographic area
  - Developing a CoC system
  - Conducting sheltered and unsheltered Point-in-Time counts
  - Monitoring recipients and subrecipients and enforcing compliance with program requirements

e-snaps : CoC Program Applications and Grants Management System - HUD Exchange   https://www.hudexchange.info/programs/e-snaps/

CoC Planning Project Application Resources for CoC Program - HUD Exchange   https://www.hudexchange.info/resource/2913/coc-planning-project-application-instructional-guide/

Unified Funding Agency

To be designated as the Unified Funding Agency (UFA) for the Continuum of Care, the Continuum must select the collaborative applicant to apply to HUD to be designated as the UFA for the Continuum. HUD will consider these criteria when deciding whether to designate a collaborative applicant a UFA:

- The Continuum of Care it represents meets the requirements on the Interim Rule;
- The collaborative applicant has financial management systems that meet the standards set forth in 24 CFR 84.21 (for nonprofit organizations) and 24 CFR 85.20 (for States);
- The collaborative applicant demonstrates the ability to monitor subrecipients; and
- Such other criteria as HUD may establish by NOFO.

If approved, the UFA may then apply for the CoC planning funds as well as additional UFA costs.

e-snaps : CoC Program Applications and Grants Management System - HUD Exchange   https://www.hudexchange.info/programs/e-snaps/

UFA Costs Project Application Resources for the CoC Program - HUD Exchange   https://www.hudexchange.info/resource/3438/ufa-costs-instructional-guide/

HMIS LEAD

HMIS Lead Role

The entity which manages a CoC's Homeless Management Information System (HMIS) on behalf of the CoC. While the CoC retains ultimate authority and responsibility for HMIS, the HMIS Lead is generally responsible for HMIS implementation which includes:

- Administration
- Management
- Operation
- Provide end user training
- Meet reporting requirements for funders

HMIS Costs

HMIS Lead may also use CoC funds to pay the costs of:

- Hosting and maintaining HMIS software or data;

- Backing up, recovering, or repairing HMIS software or data;

- Upgrading, customizing, and enhancing the HMIS;

- Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems

- Administering the system;

- Reporting to providers, the Continuum of Care, and HUD

- Conducting training on using the system, including traveling to the training

Data Quality

- Refers to the reliability and validity of client-level data collected in the HMIS
- Measured by the extent to which the client data in the system reflects actual information in the real world
- Determined by assessing certain characteristics such as timeliness, completeness, consistency, and accuracy
- In order to assess data quality, a community must first think about what data quality means and document this understanding in a data quality plan

Data Quality Management Program: https://files.hudexchange.info/resources/documents/HMIS-Data-Quality-Management-Program.pdf

Privacy

While data sharing is often necessary to provide efficient and effective housing and services, improper release or use of data may jeopardize the privacy, or even the safety, of the people who place their trust in the homelessness system of care. As such, HMIS Leads should ensure the privacy of client-level information.

- HMIS Lead creates the privacy plan related to HMIS data in conjunction with CoC data leadership.

- Meet all minimum baseline requirements laid out in the HUD Data and Technical Standards of 2004, Section 4.2 and should include or reference CoC established privacy policies and procedures.

- Include standards for agency compliance, references to HMIS Policies and Procedures, references to HMIS Participating Agency and HMIS End User Agreements, and either include or be included in a monitoring process

- Clearly state what entities and individuals have access to HMIS, protections to ensure privacy of client information, policies and procedures for client access and correction to their data, and protocols for use of data related to privacy

2004 Data and Technical Standards:
https://www.hudexchange.info/resource/1318/2004-hmis-data-and-technical-standards-final-notice/

Chapter 2 of CE Management and Data Guide:
https://files.hudexchange.info/resources/documents/coordinated-entry-management-and-data-guide.pdf

HMIS Lead Series: HMIS Lead Standards (hudexchange.info)
https://files.hudexchange.info/resources/documents/HMIS-Lead-Standards.pdf

Security

The HMIS Lead should ensure that the HMIS Policies and Procedures include provisions related to security that establish, at a minimum:

- CoC expectations for system and data security

- Responsibility for system and client data security

- System and data access classifications and descriptions

- Technical safeguards, such as user authentication, virus and firewall requirements, and physical access to systems and workstations accessing the HMIS and its data, including requirements for updating security software

- A series of policies and procedures to ensure the physical security of the HMIS and any devices used to access the HMIS

- A requirement for compliance to security policies and procedures included in HMIS Agency Participation Agreements, HMIS End User Agreements (including HMIS Lead staff), and any data release agreements

HMIS Lead Series: HMIS Lead Standards (hudexchange.info)   https://files.hudexchange.info/resources/documents/HMIS-Lead-Standards.pdf

Participation & Compliance Monitoring

- The Interim Rule requires the CoC to "ensure consistent participation of recipients and subrecipients in the HMIS."
- The HMIS Lead should assist the CoC with developing an appropriate plan for monitoring the records and data collection practices of participating agencies
- A clear and transparent monitoring plan should include:
  - References to compliance policies, procedures, and benchmarks, including those included in agreements
  - Processes for conducting a monitoring
  - A tool for conducting compliance monitoring
  - Schedules for periodic monitoring
  - Methods for communicating monitoring results to the Covered Homeless Organization (CHO) and the CoC

Data Reporting

HMIS Reporting should be a major driver of CoC decision-making, serving as a tool for:
- understanding gaps in services
- understanding community needs and the degree to which they are being met
- understanding and addressing racial disparities
- coordination between organizations
- coordination of services to clients in a housing crisis
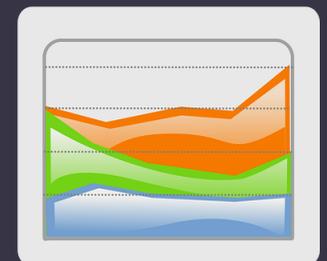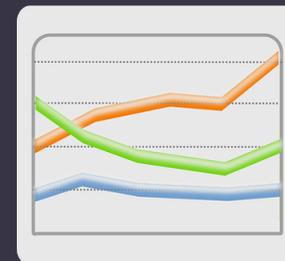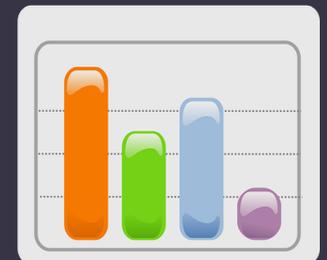
HMIS Reports

The HMIS Lead should ensure that HMIS can generate project-level reports required by HUD and other federal funding partners, including

- HMIS Comma Separated Value (CSV) Exports for upload to (HUD) Sage Repository
- Veterans Administration (VA) Supportive Services for Veteran Families (SSVF) Repository export
- Health and Human Services (HHS) Runaway and Homeless Youth HMIS (RHY-HMIS) Repository export
- Required progress reports and companion reports include: CoC Annual Performance Report (APR), ESG Consolidated Annual Performance & Evaluation Report (CAPER), Projects for Assistance in Transition from Homelessness (PATH) Annual Report, and Housing Opportunities for Persons With AIDS (HOPWA) APR.

System Performance Measures (SPM) - Overview

The HEARTH Act focuses on viewing the local homeless response as a coordinated system of homeless assistance options as opposed to homeless assistance programs and funding sources that operate independently in a community. The Act:

- Requires communities to measure their performance as a coordinated system, in addition to analyzing performance by specific projects or project types
- Established a set of selection criteria for HUD to use in awarding CoC funding in section 427 that require CoCs to report to HUD their system-level performance
- Encourages CoCs, in coordination with ESG Program recipients and all other homeless assistance stakeholders in the community, to regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress to HUD

System Performance Measures (SPM)

1. The Length of Time Persons Remain Homeless
2. The Extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness
3. Number of Homeless Persons
4. Employment and Income Growth for Homeless Persons in CoC Program-funded Projects
5. Number of Persons who Become Homeless for the First Time
6. Homeless Prevention and Housing Placement of Persons Defined by Category 3 of HUD's Homeless Definition in CoC Program-funded Projects (High Performing Communities Only)
7. Successful Placement from Street Outreach and Successful Placement in or Retention of Permanent Housing

System Performance Measures Introductory Guide (hudexchange.info)
https://files.hudexchange.info/resources/documents/System-Performance-Measures-Introductory-Guide.pdf

COC MEMBERSHIP

Membership

- A CoC is established by representatives of relevant organizations within a geographic area to carry out the responsibilities set forth in the CoC program interim rule.

- Membership should demonstrate a community wide commitment to ending and preventing homelessness

Members should 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 enforcements
- Organizations that serve veterans
- Individuals experiencing and previously experiencing homelessness

COC COMMITTEES

CoC Committees

- A good CoC has working groups or committees that manage the activities of the CoC in a diverse and structured manner.

- Roles and responsibilities are clearly defined, and safeguards are in place to protect against potential conflicts of interest.

- Committee and Working Group examples:
    - Governance committee
    - HMIS Governance
    - Lived experience committee
    - Project application rating and ranking
    - Provider Commission
    - Quality Improvement/ Performance evaluation
    - Additional committees, subcommittees, or work groups as needed

COC STAFF

Staff Responsibilities

- Manage CoC calendar (full membership, CoC Board, committee meetings)

- Support agenda development, email with attendees, record attendance, take notes, circulate to leaders for review, send out, schedule needed follow-up

- Remain aware of changing HUD priorities and requirements, keep CoC and other partners informed, and facilitate community initiatives

- Build and maintain relationships

PERSONS WITH LIVED EXPERIENCE OF HOMELESSNESS

CURRENT HUD EXPECTATIONS

- CoC requirement: CoC Boards must include at least one individual currently or formerly experiencing homelessness (consumer)
- In the 2021 NOFO, HUD incentivized communities with an opportunity for CoCs to enhance their NOFO application point totals by engaging with Persons with Lived Experience
- Persons with lived experience must have experienced homelessness within the last 7 years or are currently program participants
- Full points were available if there is more than one person engaged in local CoC planning and at least one person with lived experience came from an unsheltered situation

WORKING TOGETHER

CoC's Example Organizational Structure

CoC Membership
(Collective Impact Initiative)

Support Entities

*CoC Lead
HMIS Lead
Collaborative Applicant*

Governance Body

Rating/Ranking Evaluative

HMIS Oversight

Coordinated Entry Oversight

Other as deemed by Governance

Time-bound work or subgroups (as needed)

iMPACT HOMELESSNESS

Jan 2021
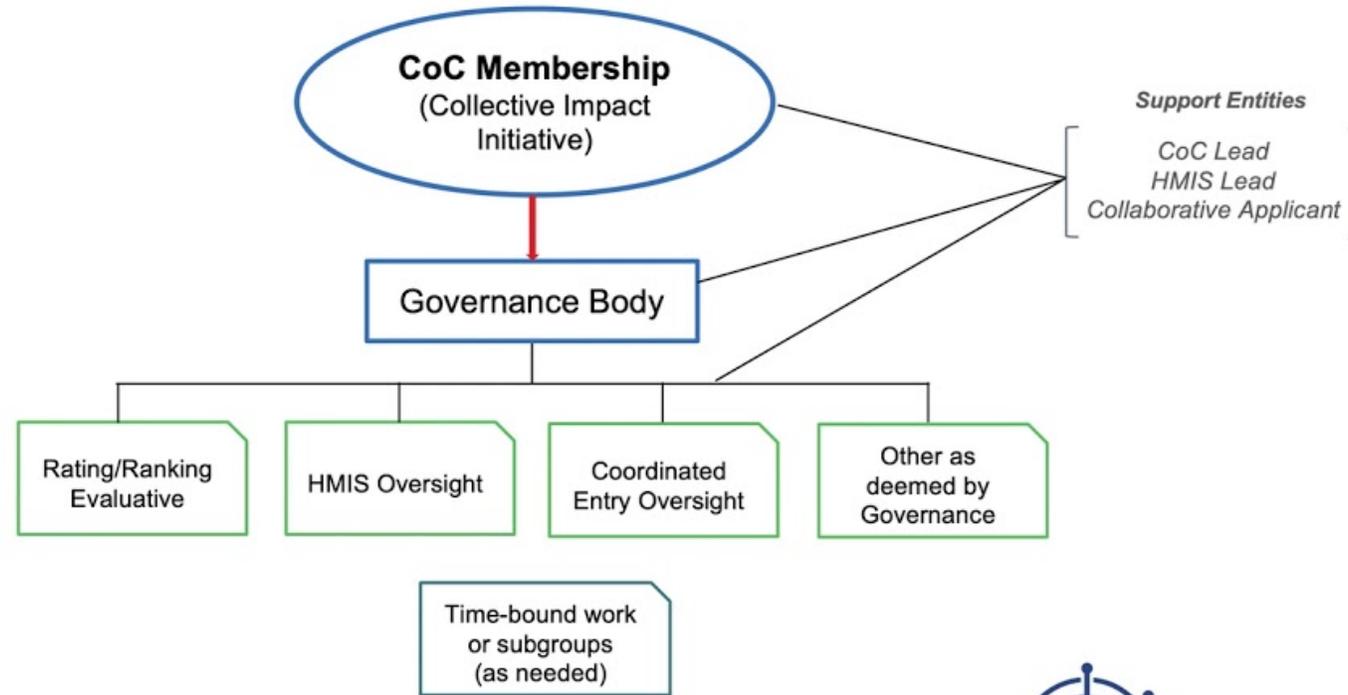
How do the Roles fit Together?

- Delegation of responsibilities - Authority may be delegated to the board, a committee, a workgroup, the collaborative applicant, the HMIS lead, or another applicable entity as determined by the CoC
- Each community can define which entities make sense to take on responsibility for each of the obligations
- Clear roles and responsibilities should be outlined in the governance charter and updated regularly
- MOUs can further define the relationships between partners

Balance of State CoCs

- Balance of State and statewide CoCs must be innovative in their leadership and governance structures to address their challenges around distance and geography.
- Some Balance of State CoCs have developed a regional approach to make the governance of large rural areas more manageable.
  - Each region usually has its own governance structures, as well as defined roles on the overall CoC governing board.
  - While it requires ongoing efforts to maintain coordination, the regional approach enhances local buy-in, creates more tailored local responses to homelessness, reduces the burden on CoC staff, and ensures better geographic coverage of the CoC.
- Balance of State CoCs can strengthen governance structures by people with influence representing a variety of sectors from various locations across the CoC.
- Balance of State CoCs can intentionally create leadership pipelines to mitigate issues associated with limited professional staff and distance.
- When staff capacity is limited, Balance of State CoCs can consider outsourcing responsibilities to third parties, such as consultants and technical assistance firms.

Rural CoCs

- Creatively engage non-targeted systems and programs, faith-based organizations, and informal partners to address resource gaps
  - Partner with programs that serve low-income people, such as TANF, SSI, SSDI, Medicaid, Public Housing Agencies, and the workforce development system
  - Partner with behavioral health and healthcare systems
- Develop outreach and engagement practices that reach people experiencing homelessness
  - Regionalize coverage
  - Build trust with non-traditional partners that encounter those experiencing homelessness, including law enforcement, medical providers, postal workers, employment agencies, park rangers, and local businesses
- Implement coordinated entry processes that promote access for people across large and/or rural geographies
  - Engage key stakeholders from across the CoC, tailor the process to local needs, and build a robust network of referral sources
- Think outside the box to expand availability of crisis beds and permanent housing opportunities
  - Provide crisis housing outside of typical emergency shelter settings
  - Increase access to affordable housing with resources such as HOME and USDA programs
  - Proactively develop landlord relationships and perform housing-focused outreach
  - Consider expanding shared housing opportunities

FACTORS FOR SUCCESS

System Performance Monitoring

- Routine (quarterly or biannual) analysis of System Performance Measures helps communities understand how their system is functioning and if they have deployed the right combination of strategies and resources
- Debrief with providers and review policies and procedures to investigate the extent to which project-level practices promote positive housing outcomes.
- Debrief with persons experiencing homelessness to understand how the program experience is showing up in the performance data
- Collaborate with a cross-section of community leaders and stakeholders to set short and long-term goals for system improvement and indicators of success
- Develop a comprehensive performance management plan which includes performance goals, baseline data, benchmarks, improvement strategies, and timelines.

Diversity of CoC Board

- Historically, homeless response systems have been predominantly established and led by white leadership
- BIPOC communities are the most impacted by homelessness in every community
- "Those closest to the problem are closest to the solution but furthest from the resources and the power"
- They typically have the best understanding of the reality of our work to prevent and end homelessness – both in terms of the problems that exist and the knowledge of the services and interventions that are the most effective solutions.

Racial inequities by the numbers: https://endhomelessness.org/resource/racial-inequalities-homelessness-numbers/

Data snapshot, racial disparities in homelessness: https://endhomelessness.org/resource/data-snapshot-racial-disparities-in-homelessness/

Authentic Engagement with PLE

Meaningful partnerships with people with lived experience of homelessness can

- help dispel dangerous and counterproductive myths regarding homelessness

- demonstrate the expertise and motivation of people with lived experience and engage communities to implement effective solutions to homelessness

It is important to meaningfully and intentionally integrate them into the decision-making structure of our work at the system and program level. When we consult the experts, service implementations are made more relevant and responsive.

Consistency with HUD Priorities

- The NOFO is often the place that HUD outlines changes to priorities
- HUD also publishes Notices and Policy Briefs, for example:
  - Coordinated Entry Policy Brief (February 2015): summarizes HUD's views on goals for the Coordinated Entry Process
  - Notice on Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status (July 2014): provides guidance regarding the order in which eligible households should be served in CoC Program-funded PSH and establishes recordkeeping requirements for CoC PSH programs with CH-designated beds
- Additional sources of HUD guidance and information about HUD priorities
  - SNAPS In Focus messages highlight SNAPS policy priorities and key information relating to CoC and ESG Program implementation
  - CoC Program FAQs contain clarifications and guidance in response to specific questions

Partnerships and Coordination

- Public Housing Authorities
- Education System
- Criminal Justice System
- Healthcare
- Veterans Administration
- Social Security Administration
- Health and Human Services
- Mental Health Authorities
- Public Health Authorities

CE Policy Brief: https://www.hudexchange.info/resource/4427/coordinated-entry-policy-brief/

Notice on Prioritizing CH in PSH: https://www.hudexchange.info/resource/3897/notice-cpd-14-012-prioritizing-persons-experiencing-chronic-homelessness-in-psh-and-recordkeeping-requirements/

SNAPS In Focus: https://www.hudexchange.info/homelessness-assistance/snaps-in-focus/

CoC FAQs: https://www.hudexchange.info/coc/faqs/

RESOURCES

HUD Resources

- HQ and Field Offices:
  https://www.hud.gov/program_offices/comm_planning/staff#fieldoffices

- Regional Technical Assistance (TA) Teams

  - support CoCs through learning opportunities with peer CoCs, Subject Matter Experts, and direct connections to TA support

  - support CoCs with challenges they face and help strengthen their overall system of care in HUD priority areas

- HUD Exchange:

  - https://www.hudexchange.info/

  - Ask A Question - HUD Exchange

  - Resource Library - HUD Exchange

  - Subscribe to HUD Exchange Mailing Lists - HUD Exchange

Important Sites

- E-Snaps - electronic CoC Program Application and Grants Management System that HUD's Office of Special Needs Assistance Programs (SNAPS) uses to support the CoC Program funding application and grant awards process for the CoC Program. https://www.hudexchange.info/programs/e-snaps/

- SAGE - HMIS reporting repository for CoC APRs, ESG CAPERs, and ESG-Cares Act Quarterly Reports. https://www.hudexchange.info/programs/sage/

- HDX - Homeless Data Exchange

  - https://www.hudexchange.info/programs/hdx/hdx-reporting/

  - Original HDX allows CoCs to submit data to HUD for:

    - Housing Inventory Count (HIC)

    - Point-in-Time (PIT) Count

    - System Performance Measures (SPMs)

  - HDX 2.0 allows CoCs to submit data for:

    - Longitudinal Systems Analysis (LSA) Report

    - Stella - a strategy and analysis tool to help CoCs understand how their system is performing and model an optimized system that fully addresses homelessness in their area

CPD Staff HQ & Field Offices | HUD.gov / U.S. Department of Housing and Urban Development (HUD)
https://www.hud.gov/program_offices/comm_planning/staff#fieldoffices

SNAPS Announces Relaunch of Regional TA Teams - HUD Exchange
https://www.hudexchange.info/news/snaps-announces-relaunch-of-regional-ta-teams/

Welcome to HUD Exchange - HUD Exchange
https://www.hudexchange.info/

Ask A Question - HUD Exchange
https://www.hudexchange.info/program-support/my-question/

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e-snaps : CoC Program Applications and Grants Management System - HUD Exchange
https://www.hudexchange.info/programs/e-snaps/

Sage HMIS Reporting Repository - HUD Exchange
https://www.hudexchange.info/programs/sage/

HDX Reporting - HUD Exchange
https://www.hudexchange.info/programs/hdx/hdx-reporting/

Stella - HUD Exchange
https://www.hudexchange.info/homelessness-assistance/stella/#stella-p-basic-resources

Questions?