Introduction

The McKinney-Vento Homeless Assistance Act of 2009 (the Act) and the Continuum of Care (CoC) Interim rule, (which implements the Act), provide community-based local planning groups with a framework for the effective organization, system planning, and measurement of the homeless crisis response system. The CoC Program is an essential resource helping the U.S. Department of Housing and Urban Development (HUD) meet the national goal of preventing and ending homelessness in the United States. HUD defines a CoC as the geographically based group of representatives charged with carrying out the CoC planning responsibilities. The three major duties of a CoC are to: (1) operate the CoC, (2) designate a Homeless Management Information System (HMIS) for the CoC, and (3) plan for the CoC.

The purpose of a Continuum of Care (CoC), as defined in the Act, is to “promote community wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and state and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effective utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.”

CoCs cover many different configurations of geography. Some CoCs focus on population-dense areas, like major cities. Other CoCs include multiple cities and the surrounding counties. While other CoCs, cover wider areas of a state. This document focuses on two types of state-based CoCs. The “Balance of State (BoS) CoC” includes all the jurisdictions in a state that are not covered by any other CoC. BoS CoCs include non-metropolitan areas and may include some or all the state’s smaller cities. The “Statewide CoC” is a CoC that covers every jurisdiction in the state. For the purpose of this Toolkit, any references to BoS CoCs will also include Statewide CoCs. Figure 1. “Map of Balance of State and Statewide Continuums of Care” shows the locations of these CoCs in U.S. geography.

BoS CoCs face unique challenges in their efforts to prevent and end homelessness across a large geographic area. The geographic areas that make up BoS CoCs vary from rural, suburban, and urban, with many types of communities throughout. As CoCs are working not only to comply with federal, state, and local regulations, they are also trying to create a cohesive system of care that prevents every individual from becoming homeless and that ensures the experience of homelessness is rare, brief, and one-time.
Addressing rural homelessness is a unique challenge for many BoS CoCs because even the different rural parts of a single BoS can be distinct. For example, the Virginia BoS includes rural communities located along the waterfront of the Eastern Shore as well as the mountainous Appalachian area. Both areas are rural; however, the geography, economy, housing market, and regional characteristics differ from one another. Although general approaches to addressing rural homelessness are similar, solutions may need to be adapted to consider the unique needs of each rural region within the BoS CoC coverage area.

In a survey of BoS CoCs in July 2017, the CoC Lead was asked to identify the CoCs top success and biggest challenge. CoC Leads identified two related successes: 1) reducing the number of people experiencing homelessness in their geographic area, and 2) ending homelessness among Veterans. The biggest challenge that they identified was the lack of capacity in staff and resources, both for planning and operating the CoC as well as the delivery of homelessness assistance.
Instructions for Using the Toolkit

This Toolkit focuses on topics within the following key areas:

I. Governance Structure and Operations  
II. Systems Approach Implementation  
III. Coordinated Entry  
IV. HMIS and Data  
V. Recipient and Project Engagement  
VI. Resources

This Toolkit can be used by anyone interested in creating a high-functioning BoS CoC. It may be particularly helpful for those working to:

- Establish a BoS CoC with a strong, compliant foundation  
- Address gaps or challenges within their BoS  
- Implement an effective coordinated entry process  
- Effectively utilize data and manage a strong HMIS  
- Interact with providers more efficiently and fluidly  
- Contemplate the merger of multiple CoCs

Suggested ways to use this Toolkit:

**Approach 1:**
Use the Table of Contents to find specific subsections that apply to your local BoS CoC needs and challenges. Read these sections individually as the need arises.

**Approach 2:**
Starting with the Introduction, read the Toolkit from beginning to the end. You can always go back to individual sections as the needs and challenges change in the BoS CoC.

Each section provides a brief introduction of the topic area, and then names challenges that a BoS CoC might encounter within that particular topic. Each challenge, or set of challenges, is provided with an action, or set of actions, that can be implemented by the BoS CoC.

As you are reading through the section, identify which Challenges are faced by your local BoS CoC, and which Actions might be viable solutions in your BoS CoC. Please note that the order of actions do not serve as sequential steps to follow, but are provided as suggestions that have worked in other BoS CoCs. Your local BoS CoC may not face all of the challenges listed and not all of the actions may make sense within your specific geography. Test some of the actions to try new things and make sure you are constantly iterating to figure out what works best.

Review the Resource section for additional materials and ideas from HUD guidance, national partner recommendations, peer community examples, and other tools that may be useful to implement in your local context.
Four Key Foundations

Much of the work described in this Toolkit has four key foundations: quality, capacity, performance, and resources. While all the suggested actions in this Toolkit relate to these foundations, in cases where an action might particularly help you address one of these foundations, we have placed an icon corresponding to the foundation next to the action description.

🔥 Quality

Quality is the degree of excellence something possesses. The work of a BoS CoC is only as good as the lives it changes, and to do that well, the CoCs work must be high quality. Quality is discussed as 1) a measure of a CoCs data – it must have good data quality in order to have accurate system performance measures; 2) the performance of the CoCs projects – projects need to meet certain benchmarks to rank high in the competition; or 3) coordinated entry implementation – the access, assessment, prioritization, and referral processes must meet certain thresholds of integrity to the model, such as being low barrier, Housing First, person-centered, strengths-based, etc.

🔧 Capacity

Capacity is the ability or power to do, experience, or understand something. BoS CoCs often describe the challenges of their work as a result of limited capacity. Usually the lack of capacity revolves around not enough staff, time, or resources to complete all the work a CoC must do to comply with regulations and to create an effective system that ends homelessness for all persons. Capacity also refers to project capacity for good project administration, management, and operations. Building capacity within a CoC and projects is a practice that develops and strengthens skills, abilities, processes, and resources that the CoC and its projects need in order to not just survive but thrive in its work.

🔎 Performance

Performance is the accomplishment of a given task as measured against a pre-defined set of benchmarks. Within a CoC, performance measurement is a critical component that demonstrates the success of its geographic area in meeting its stated goals and objectives. CoC and project staff are responsible for managing the performance of individual projects and the system as a whole.

💰 Resources

Resources have multiple meanings in this Toolkit. First, there are a variety of existing materials identified for the topics in this Toolkit. For each section, there are lists of different types of resources (from HUD guidance and federal partner recommendations, to community examples) that can be accessed and customized for a CoC. Second, this Toolkit provides information and asks questions for a BoS CoC to consider regarding the types and amount of resources (i.e. money, units, partners, staff, etc.) that they currently have available and that are needed to meet their goals.
SECTION I

STRUCTURE AND OPERATIONS
I. Structure and Operations
The task of governing a CoC can be complex, and CoCs should take care in planning how their group will be structured so that it can operate efficiently to meet its goals.

I.A Governance
A CoC must establish and implement an effective governance structure via a written charter which serves to formalize BoS CoC composition, authorize decision-making authority, and set a path to accomplish the tasks mentioned above. There must be a CoC Board, HMIS Lead, Collaborative Applicant (CA), and Committees or Work Groups. The work of the Collaborative Applicant may be shared with another organization that helps to lead the CoC. If a CoC designates another entity to staff and structure the CoC but is not the applicant, this entity is sometimes called a lead agency.

At a minimum, a CoC is required to complete the following tasks:
- Adopt and annually update a governance charter establishing a board and appointing committees, subcommittees, and workgroups, as needed;
- Conduct systems coordination around areas including: prevention, outreach, engagement, assessment, shelter, housing, supportive services, and a coordinated entry process (CE);
- Conduct a Point-in-Time (PIT) count;
- Conduct an Annual Gaps Analysis;
- Coordinate with ESG recipients and subrecipients;
- Complete Annual Reporting;
- Operate an HMIS; and
- Prepare and submit an Annual Application for funding

I.A.1 Governance Structure
There are two different types of governance structures found within BoS CoCs: centralized and decentralized. Decentralized or regional structures are most common. The table below outlines the key differences between the two structures.

<table>
<thead>
<tr>
<th>Centralized Governance Structure</th>
<th>Decentralized Governance Structure</th>
</tr>
</thead>
<tbody>
<tr>
<td>• BoS CoC may have a regional structure for implementation of decisions</td>
<td>• Within the BoS CoC there are regions</td>
</tr>
<tr>
<td>• BoS CoC (and/or CoC Board) members are not based on region or geography; but more likely on expertise</td>
<td>• Each region sends at least one representative as a member in the CoC (and/or CoC Board)</td>
</tr>
<tr>
<td>• Decisions are made by the CoC and/or CoC Board that are then implemented upon at the local level</td>
<td>• Each region has equal participation and decision-making authority</td>
</tr>
<tr>
<td></td>
<td>• Within each region decisions are made that the regional member acts on behalf of the regional bodies decisions</td>
</tr>
</tbody>
</table>
**Challenge**

BoS CoCs may have issues identifying members and leadership that is representative of the entire geography of the CoC, because it may be easy for larger counties, cities or suburbs to be over represented, or smaller more rural areas may have capacity constraints preventing their involvement.

OR

Entities funded through mainstream sources may not realize or recognize why they should be involved in the CoC.

**Action**

<table>
<thead>
<tr>
<th>Benchmark your BoS CoC with ‘CoC Governance and Structure Checklist’ (a tool for communities to use to determine if their CoC Governance and Structure is in compliance with the Act and the CoC Program Interim Rule) to see where areas of need exist. Develop a plan to make changes to come into compliance and charge each necessary task to a committee or workgroup of the CoC with Board input.</th>
</tr>
</thead>
<tbody>
<tr>
<td>The CoC Board should take the lead and work with committees and CoC members to make changes in structure based on the CoCs needs. Identifying the appropriate Board and CoC members should be a task involving the entire membership of the BoS CoC.</td>
</tr>
<tr>
<td>Ensure that partners at the table are given a chance to meaningfully participate. For example, having school liaisons is critical but if they never get a chance to truly share their insight then you lose the value of having them at the table.</td>
</tr>
<tr>
<td>Develop orientation materials and training for existing and new BoS CoC board members to ensure a consistent base of knowledge on the BoS CoC, laws and regulations (e.g., the CoC Program Interim Rule), homeless crisis response system in the community, strategic plans, vision and goals. Offer resources to expand their knowledge and skills on an ongoing basis.</td>
</tr>
<tr>
<td>Identify who helps onboard, provides orientation and training for new Board and committee members.</td>
</tr>
<tr>
<td>Designate a place to house materials, meeting agendas, notes, documents for the CoC, members and Board members. Decisions and work need to be memorialized and can be put on a shared Google drive, web page, etc.</td>
</tr>
</tbody>
</table>

**Challenge**

Agency staff from smaller communities may be stretched in trying to represent all the required subpopulations of those experiencing homelessness, such as families, youth, Veterans, survivors of domestic violence.

**Action**

Designate the appropriate entity (CoC Board or a committee) to work with all of the CoC members, recipients, CA, HMIS lead and Board to conduct needed outreach and
relationship building activities to assure that there are CoC members that represent all of the relevant subpopulations.

Consider how the BoS CoC will ensure that individuals who are currently homeless or have experienced homelessness participate on an equal footing with other members. Reimbursement for time and transportation may resolve barriers to meaningful participation, and could be paid for by CoC planning grants, community foundations or fundraising efforts. Additionally, an agency or organization could ‘sponsor’ the participation of an individual experiencing homelessness by allocating a stipend for their time and assisting with arranging transportation for CoC events.

**Challenge**

Availability of staff and funding will vary in different localities across the CoC.

**Action**

Consider ways to use technology and online meeting platforms for participation in CoC meetings in lieu of in-person meetings. This cuts down on travel, thus saving time and money. Require one in-person board meeting that coincides with the annual membership meeting. Ensure that you are finding ways to keep the human connection even if using technology for most of your communication (i.e. Skype, FaceTime, and Webinar with Video so you can still ‘see’ each other).

I.A.2 Governance Charter

Per the Act and CoC Program Interim Rule a CoC must have a written governance charter that is adopted and updated annually. The governance charter outlines the roles and responsibilities of the CoC, the Board, CoC Committees, the Collaborative Applicant, and the HMIS Lead. *Figure 2 “Example of a BoS CoC Governance Structure”* shows major CoC players (Members, Primary Decision-Making Group, Lead Agency, Committees and Task groups), as well as responsibilities and actions.
**Challenge**

A BoS CoC may not have the capacity to develop an effective governance document, or to maintain an annual updating schedule.

**Action**

- Do internet research to access quality CoC charter sample templates to model; ensuring that revisions are reflective of the specific BoS CoC structure.
- Develop peer relationships with other BoS CoCs that you can contact to brainstorm with, bounce ideas off of, and learn from each other.
- Identify other planning groups in your community who have experience creating governance and structure and ask them to assist your BoS CoC with those areas.
- Attract a temporary employee (like an intern or Vista) who can take the lead on drafting the governance charter. Take advantage of local colleges or universities where you have a base of students that might be able to lead this project to fulfill school requirements. This may get things started and give you the momentum to keep it going when you don’t have access to that temporary employee any longer.
**Challenge**

It can be difficult to decide which governance structure is most effective for a particular locality.

**Action**

<table>
<thead>
<tr>
<th>Identify the key decision points related to governance structure that the BoS CoC is struggling with. With a small working group, brainstorm for each key decision point between 2-4 potential models that could potentially work in your CoC. Take those models to the full CoC for discussion and vote.</th>
</tr>
</thead>
<tbody>
<tr>
<td>It’s ok to try ideas and if they don’t work to revise them. The governance charter should be reviewed and approved annually; there is always the option to revise more frequently if you have tried something and it is just not working.</td>
</tr>
<tr>
<td>Request HUD Technical Assistance in the area of governance to get assistance with the development or substantial overhaul of the BoS CoC charter.</td>
</tr>
</tbody>
</table>

### I.B Roles and Responsibilities

The CoC is a collaborative community effort across multiple sectors and relies on many roles with designated responsibilities, including: CoC Members, CoC Board, Regions or Local Planning Bodies, Committees or Work Groups, and staff of the Collaborative Applicant. The BoS CoC must decide and communicate how each of the roles will be filled and how responsibilities will be handled.

In addition to active members, the leadership structure (including the CoC board, committee chairs, and Collaborative Applicant) of the BoS CoC plays an important role in ensuring effective planning, implementation, and outcomes of the CoC as a whole. The CoC structure and practices need to be supported by dedicated leadership, with consistent follow-through and transparent, documented decision-making. If this is not the case, the structure needs to be revised. Leadership skills most needed in cross-sector collaboratives such as the CoC, are a combination of task-oriented and relationship-oriented behavior, according to an IBM Center report, *Effective Leadership in Network Collaboration: Lessons Learned from Continuum of Care Homeless Programs*. These management skills are critical to have within CoC leadership to accomplish the varied activities necessary for the work, such as creating work plans, timelines, budgets and committee work, along with developing, nurturing and management of all types of relationships, from community partners, advocates and providers, to elected officials, funders and mainstream service sectors.

#### I.B.1 CoC Membership

BoS CoC membership consists of provider organizations, recipients (formerly known as grantees), subrecipients, affiliated organizations, and stakeholders.

To accomplish the goals and vision of the BoS CoC, assuring active participation by CoC members is essential. Participation means that stakeholders dedicate sufficient staff time and resources to assist in CoC governance and goal achievement commensurate with their role and responsibilities relative to the CoC. Participation may occur at any level in the CoC governance structure.
Representatives from relevant organizations within a geographic area shall establish a Continuum of Care for the geographic area to carry out the duties of this part. Relevant organizations include nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve Veterans and homeless and formerly homeless individuals.

*CoC Program Interim Rule 578.5(a)*

**Challenge**

Agency staff often wear multiple hats, participate in multiple arenas, and have restricted funding streams making it difficult to prioritize CoC membership.

OR

Membership may turn over frequently, resulting in lost expertise and relationships.

**Action**

- Provide ongoing training on roles and responsibilities for CoC members. Develop an orientation packet or curriculum for the CoC that can be used with new CoC members. Designate who will be responsible for the development of the materials, as well as who will carry out the actual orientation/training sessions.

- Cast a wide net in your community to seek expertise for discrete roles such as participation on committees, planning and volunteering at events and task forces. Potential partners can come from health care systems, municipalities, universities, community foundations, United Way, etc.

- Members are more likely to participate when they have a defined role, such as a work group regional representative or committee member.

- Recruit volunteers for CoC membership from colleges and universities, corporate programs, AmeriCorps, or volunteer recruitment websites like VolunteerMatch, Idealist, or Createthegood.org.

**Challenge**

BoS CoCs may experience large fluctuations in membership or meeting attendance, making it difficult to meet a quorum requirement for action items.

**Action**

Document in the Governance Charter what constitutes a quorum.
Decide what will constitute a quorum for action items and voting purposes, giving careful consideration to the issue. Realistic quorums will be a large enough number to truly represent the CoC as a whole, such as 50 percent or 50 percent +1; however, in a larger BoS CoC membership body, it may be more realistic to do 10 percent of the total membership.

I.B.2 CoC Board
The CoC Board is the collective of individuals designated by the CoC membership to provide oversight and governance on behalf of the CoC. The CoC Board must be representative of the relevant organizations and projects serving homeless populations and subpopulations within the CoCs entire geographic area. The CoC Board must include at least one homeless or formerly homeless individual.

The CoC Board may be designated to set the vision for the effective operation, goals and expected achievements for the homeless crisis response system. The Board, if charged with authority by the CoC membership through the governance charter, can be responsible for many of the aspects of operating a CoC, either directly or in concert with the HMIS Lead and/or CoC Collaborative Applicant.

Challenge
CoCs often have difficulty finding effective CoC Board members who meet all of the requirements and are able and willing to devote the time necessary to serve.

Action
Use networking and advertisements to recruit effective leaders for the Board, including members representing elected leadership, local champions and influential stakeholders through government, foundation or university partners.

Ensure representation across BoS CoC geography by setting representation goals for region or county, or creating permanent seats codified in the governance charter. Be specific about the difference in duties between local governance and BoS CoC governance. Ensure that not all Board members are CoC-funded organizations by including state level partners, coalitions, advocates, and nonprofits. Key stakeholders can assist in getting representatives involved with local/regional groups.

Challenge
CoCs may lack a comprehensive orientation and training program for Board members, resulting in uninformed and ineffective Board members.

Action
Sample CoC Board orientation materials can be found online to create a customized CoC training curriculum - this may be a good project for volunteers. Reach out to other BoS CoCs to request template documents that have been proven effective.

Look to establish peer mentorships and support by finding other BoS CoCs that are similar or more advanced and develop a collaborative relationship. Share practices, documents, agreements, templates and work plans. Use this relationship as a place to brainstorm, discuss challenges and successes, and cultivate feedback on new ideas.
Provide feedback to individual Board members and committee chairs on their participation.

**Challenge**
CoCs may have difficulty sustaining membership and leadership, thus losing momentum for key initiatives.

**Action**
Consider succession planning as a Board and CoC to assure a pipeline of leaders for Board members, thus developing new voices and ensuring stability when turnover occurs.

**Challenge**
BoS CoCs may have difficulty meeting face-to-face for Board meetings, given the dispersed nature of the CoC and the territory it covers.

**Action**
- Hold CoC Board meetings in varied locations around the state to encourage participation and share travel burdens equally.
- Pair the business meeting one day with a training the next.
- Partner with local colleges for space and Continuing Education Units (CEUs) which incentivize participation.
- Use virtual tools to hold committee and/or Board meetings between in-person meetings. Many agencies, extension centers and universities offer their technology to community partners at no cost.
- To encourage future participation, set an annual calendar and hold meetings consistently. Create agendas and send them with meeting reminders in advance. Capture notes with action items, follow-up items and assignments and share them in a timely manner via a commonly accessible location.
- Prior to meetings spend the time to invite certain members to share during the meeting. This will yield critical results in ensuring that members come better prepared to participate and feel as though they add value to the Board.

### I.B.3 Regions or Local Planning Bodies
BoS CoCs have a unique geographical composition made up of rural areas, small cities and suburbs, and can be made up of multiple counties or an entire state. To plan, coordinate, and implement changes in a more effective way, BoS CoCs can create smaller consortia, in the form of regions or local planning bodies. For an example of this model, see Figure 3. **TX BoS CoC Local Homeless Coalitions (LHCs) Map September 2016.** BoS CoCs may choose this configuration for such tasks as coordinated entry implementation, outreach, or Veteran master lists.
Since homelessness response cuts across multiple systems, regional decision making can be very impactful. Successful models must include effective communication, strong local leadership, training, robust participation, and the capacity to successfully implement change at all levels. In a BoS CoC, it is critical to ensure representation for the needs of each area within the CoC. An effective BoS CoC can be considered to function as an alliance that represents the collective interest of the smaller planning bodies, providing strategic direction, administration, funds, and evaluation.

**Challenge**

The roles, responsibilities, and authority of a regional structure may be confusing for local CoC members to understand and navigate.

**Action**

<table>
<thead>
<tr>
<th>The Governance charter should spell out relationships, roles and responsibilities of regions /local planning bodies to the larger CoC/Board.</th>
</tr>
</thead>
<tbody>
<tr>
<td>A chart with the entire BoS CoC (Board, Collaborative Applicant, committees) and regions will help illustrate and clearly define the relationships and roles.</td>
</tr>
<tr>
<td>Consistent language and titles within the CoC should be used to avoid role confusion (e.g., a local planning body is mistaken for a CoC by partners or members).</td>
</tr>
</tbody>
</table>
The CA or full CoC Board can provide training to local planning bodies/regions on how to operate effectively and help share best practices across local/regional groups. Emphasis needs to be placed on the BoS CoC system as a whole.

Provide assistance to local planning bodies on project concept, planning and readiness to increase understanding, boost technical knowledge and ability to assure rapid project implementation.

Utilize peer opportunities between/across local planning bodies to highlight and expand best practices. If possible, match high performers with lower ones.

Merge an existing region with another adjacent region to consolidate capacity, expertise and resources.

**Challenge**

Some regions or areas may have no representation or members do not participate, while other regions dominate or are over represented. There may not be a CoC Program-funded project in each county or region, therefore ongoing participation in the CoC is not necessarily incentivized, and it may be difficult to keep participants engaged when the perception is that the region 'has no skin in the game'.

**Action**

Develop participation incentives for local or regional mainstream programs. Consider what a partnership could gain on both sides, such as data access, expanded networks, common customers and mutually beneficial solutions. Explore the benefits of offering governance opportunities such as Board seats, Committee participation or Committee seats.

Require voting members to attend a certain number of meetings per year to encourage ongoing participation. Limit one vote per agency, regardless of how many staff members are in attendance or participate.

Tie active regional/local planning group participation to rating/ranking as part of the CoC application.

Share some of the CoC planning funding with regions/local planning groups to further incentivize participation.

Establish a policy of equal representation across local planning bodies, counties or regions to limit the number from any one area.

Send a CoC Board member of Collaborative Applicant staff to a region that is not represented to identify a champion. Champions can be elected officials, government officials, or members of the community. It may take time to identify someone in the smaller areas but finding an interested party will result in great benefits.

**Challenge**

It may be difficult to ensure that the local priorities of the regions/local planning bodies get elevated for consideration, inclusion and action at the CoC level.
Action

Be explicit on the scope and purpose of the region/local planning body, calling out where planning occurs and how the region relates to the CoC.

Regional policies and procedures can mirror the larger CoC governance charter language for standards, along with inclusion of local practices, priorities and issues.

Establish methods for local input and communication of needs, issues and priorities from local planning bodies/regions with ongoing participation in CoC committees.

Offer communication opportunities for regional/local input on proposed policy changes, resource distribution, project implementation and feedback via multiple approaches such as focus groups, town hall or public meetings, newsletters, email and website information sharing. Keep in mind the burden of time, expense and travel challenges when soliciting ongoing feedback, participation, and input.

Collect and review regional/local planning body meeting minutes to connect with and monitor their current work and planning.

Use existing initiatives as examples of potential partnership across systems outside the homeless crisis response system.

I.B.4 Committees and Work Groups

One of the duties of a CoC is to appoint additional committees/subcommittees/work groups to carry out the work of the CoC, regularly report to the CoC Board, and inform CoC membership of the activities and progress. Each committee should have a clear understanding of its purpose, charge, lines of authority and reporting.

Challenge

The CoC may lack an effective structure, needed leadership, or capacity to staff committees.

Action

If you don’t currently have a committee structure, create one. Committees can help create recommendations to the decision-making entity, or entities, and create buy-in for the decisions.

Consider succession planning to assure a pipeline of leaders for committee chairs, thus developing new voices and ensuring stability when turnover occurs.

The CoC and Board should conduct an annual review of committee structure, accomplishments, effectiveness, leadership and composition.

Adjustments based on the outcome of the review could include adding members with additional expertise or changing the committee structure or leadership.

Establish the expectation that each BoS CoC Board member will chair or actively participate in a committee, to ensure effective communication, guidance on priorities,
and a direct feedback loop. Have each Board member sign a commitment letter or job description that highlights committee participation expectations.

Use of a structured action agenda format for notes and assignments may be helpful for documenting work, commitments, and follow-up items.

Include language in CoC policies as to expectations for ‘participation’ on a committee.

Review examples from other BoS CoCs to see how they are structured and work with the CoC Board to recommend changes.

**Challenge**

There may be legacy committees that are not currently needed.

**Action**

Committees or task groups need to be designated as ongoing committees or time-limited task groups, depending on the scope of work. Each should have a current detailed work plan, with timeframes and specific targets or goals the group seeks to achieve.

### I.B.5 CoC Staff

The term “CoC Staff” refers to the specific agency or agencies that carry out the work of the CoC. In many communities, the Collaborative Applicant not only applies for CoC funds, but may also assume the role of the lead agency. The CoC membership must designate responsibilities to a specific agency, and document that designation in the governance charter and via a written directive or memorandum of understanding (MOU). This entity should be viewed as the primary administrator of required CoC activities, although the exact roles and responsibilities will be at the discretion of the CoC and should be clearly stated.

Regardless of how a BoS CoC is organized, the CoC membership is ultimately responsible for the operation of the CoC, including the designated duties carried out by the Collaborative Applicant or the BoS CoC Board.

**The CoC Collaborative Applicant (CA)** is the eligible applicant (state, unit of local government, private nonprofit organization, or public housing authority) designated by the CoC to: 1) collect and submit required CoC application information for all projects within the geographic area the CoC has selected for funding, and 2) apply for CoC planning funds on behalf of the CoC. If the CoC is an eligible applicant, it may designate itself as the Collaborative Applicant via a nomination and vote by the membership.

The following are role descriptions emphasizing the various points of expertise which a CoC may want to ensure are present. While the specialists are listed and described separately, CoCs may find that in their
I. Structure and Operations | Balance of State Continuum of Care Toolkit

local environment, some topics or categories naturally combine into one job position. Responsibilities may be delegated along the following lines:

**CoC Director:** All strategic planning and high-level engagement with key stakeholders

**Data Coordinator:** PIT count, Housing Inventory Count, AHAR, HMIS governance, HMIS Committee, HMIS implementation, performance improvement, and provider recruitment,

- **HMIS Specialist(s):** Day-to-day operations of HMIS, help desk, training, reporting, and documentation
- **Performance Specialist:** System Performance Measures, data analysis and quality, and data visualization

**System Coordinator:** Oversight of all CoC planning activities, CoC Governance (including CoC Board, CoC membership, and Committees), Regional Body coordination, and relationship building

- **Grants Specialist:** Coordination of the CoC Competition, oversight of all internal and external homeless system grants, and coordination with ESG jurisdictions, grantee administration, and liaison to regional bodies
- **Sub-Population Specialist:** Oversight of all sub-population specific initiatives (Veteran, youth, chronic homelessness, family, etc.), facilitation of leadership teams, reporting on progress, and liaison to regional bodies
- **Coordinated Entry Specialist:** Planning, design, and implementation of coordinated entry, capacity building for current and future recipients, and liaison to regional bodies

**Community Engagement Specialist:** Coordination with all community stakeholders, tracking CoC membership engagement and participation in CoC meetings, overseeing all technical assistance and training activities for the CoC, and liaison to regional bodies

**Monitoring Specialist:** Monitoring all CoC and ESG recipients and subrecipients, consolidated planning coordination, and liaison to regional bodies

**Financial management:** LOCCS system, invoicing, bookkeeping, monitoring spending, planning funds and other financial matters.

**Challenge Steps**

The CA may dominate the direction of the CoC or make decisions without authority or approval, especially if they are part of a government entity with political priorities, making it difficult for other members to participate in CoC planning and decisions on an equal footing.

OR
Where the CA and the organization doing the CoC management work are not the same entity, they may lack clarity in the division of responsibility and struggle to establish communication processes, resulting in disorganization and confusion.

OR

A lack of action on the part of the CA will hamper or delay many functions and required roles of the CoC. Inaction may be due to capacity issues, staff turnover, or limited resources for a larger number of municipalities to coordinate.

**Action**

<table>
<thead>
<tr>
<th>Develop an MOU between the Board and CA which includes oversight and communication expectations.</th>
</tr>
</thead>
<tbody>
<tr>
<td>To ensure accountability, the CA should develop detailed work plans that are informed by the MOU and the CoC strategic priorities for the year.</td>
</tr>
<tr>
<td>Create an evaluation process based on the MOU and work plan, and ensure that the CA have the skills, resources and capacity necessary to carry out the activities.</td>
</tr>
<tr>
<td>Establish and implement frequent monitoring, reporting and robust communication mechanisms for the CA, especially if the evaluation reveals gaps or issues.</td>
</tr>
<tr>
<td>If other remedies are unsuccessful, the CoC may decide to designate another entity to carry out the duties and responsibilities of the CA.</td>
</tr>
</tbody>
</table>

**Challenge**

CA's report that it is difficult to identify and sustain dedicated resources for paid CoC staff.

**Action**

| Work within regional structures or local planning bodies to capitalize on local expertise. |
| Identify local leaders or chairs to coordinate and train local government. |
| Consider hiring a CoC staff person that can work remotely within specific regions of the BoS. The staff could be embedded in local agencies or rotate amongst several counties to cut down on travel. |
I.C Performance
CoCs should regularly review data at the project and system level on a regular basis to assess performance, ensure data quality, and identify opportunities for improvements.

<table>
<thead>
<tr>
<th>Project-Level Performance</th>
<th>System-Level Performance</th>
</tr>
</thead>
<tbody>
<tr>
<td>In consultation with recipients and subrecipients, CoCs must establish performance targets on the project level that are appropriate for population and project types. Project-level performance should be adapted to the unique circumstances of projects, especially for target populations served by projects. CoCs are required to monitor recipient and subrecipient performance outcomes and rates of spending for ESG and CoC projects and must take action if there are poor performers. CoCs should tie the project-level performance to the larger system-level performance.</td>
<td>CoCs also must evaluate performance on the CoC at the system level and may utilize a CoC performance committee to review data, make recommendations, and work with the entire CoC to enhance performance. HUD encourages CoCs to coordinate with ESG grantees in order to provide seamless services across the entire homeless crisis response system. HUD expects CoCs to provide information and performance data to jurisdictions within its geography to inform the Consolidated Plan (ConPlan). The CoC Board can lead the effort to ensure performance targets are being met and take action on performance recommendations. The HMIS Lead can assist with this effort by monitoring data quality, analyzing data, and tracking project and system performance measures.</td>
</tr>
</tbody>
</table>

**Challenge**
Issues with staff capacity at the local level may impede the provision of sufficient data to evaluate performance or completion of needed tasks.

**Action**
- Embed HMIS staff in each regional group to focus on training users, troubleshooting, monitoring data quality, and serving as liaison with HMIS lead staff.
- Centralize performance monitoring, report creation, HMIS governance, and other standards with the HMIS lead.
- Increase staff capacity by setting up opportunities for local staff to share best practices and efficient methods with each other.
- Work with other funders, especially the state, to require HMIS participation and high data quality standards.

**Challenge**
Each year, BoS CoCs may have to engage and monitor dozens of projects, spread out across a multi-county CoC.
Develop a calendar of monthly or quarterly BoS CoC performance reviews showing the data needed. Make this report a regular requirement for members and recipients for quality and compliance assurance. Tie this to the rating and ranking for the annual CoC application as an incentive.

Setting meaningful and effective performance targets across a wide CoC geography is demanding, given the range and variation in recipients, needs, staff capacity, and resources.

Work with the HMIS lead to focus on system performance measurement and data quality, developing an improvement plan if needed on the project and/or system level with specific targets and benchmarks.

At each CoC meeting, have regional representatives share successes, best practices, innovations, unique relationships, projects or services.

Involve members, recipients and the Board in setting performance targets, reviewing data and information (de-identified), and making recommendations for process improvements.

To participate in the Con Plan process, a BoS CoC must interact with each jurisdiction within its geography.

Local planning bodies and regions can be helpful in working with their local jurisdictions on the Con Plan.

Clarifying responsibility and authority in a BoS CoC is critical for effective program management. BoS CoC leadership must consider the unique needs and challenges within all the communities covered by the BoS CoC, as well as the integration of best practices. Cultural uniqueness should be considered and respected while still balancing HUD requirements. The governance charter should outline the decision-making authority of each group, including when to make a recommendation to another group and when to report to other groups.

Unlike a CoC covering a single city or county, BoS CoCs are unique in the large geographic areas that are covered throughout the CoC. Establishing and maintaining clarity about which level of entities are decision-makers on specific activities within the BoS CoC is essential, given the potentially large number of members, local or regional planning bodies, and committees. In a centralized BoS CoC decision-making process, the CoC must consider the needs of the local regions, while balancing overall CoC priorities as they make decisions for the entire BoS CoC. In a local decision-making process, the local
regions identify their individual distinct needs and make local decisions while ensuring that their
decisions are aligned with the overall CoC vision, standards, priorities, policies, goals and approaches.

**Challenge**
The BoS CoC must represent the needs of a large geographic area.

**Action**
The CoC should choose, and document in their governance charter, the type of CoC
decision-making process they will utilize (centralized, local, or another process).

The CoC should create a decision-making process chart that outlines specific types of
decisions, specify who has authority to make recommendations and who has authority
to make final decisions for each decision-type, and the process for recommendations
to go to the decision-making entity.

Conflict of interest policies must be established and enforced. Annual conflict of
interest statements should be signed by CoC members, disclosing issues with any
possible relationships or areas of influence.

Assure that each BoS CoC committee contains some regional participation to represent
the unique needs and issues of each area.

**Challenge**
It may be difficult to maintain and document clear, transparent decision-making.

**Action**
Each decision should have an implementation plan with action steps, persons
responsible, and mechanisms for timely implementation and accountability.

Develop a workgroup or committee with regional and CoC Board representation to
provide ongoing guidance and monitoring on the implementation of CoC goals and
work plans.

Assign responsibility for note taking at all CoC meetings and committees, in order to
track decisions, assignments, and due dates.

Develop template documents such as checklists, work plans with timelines, and self-
monitoring tools. Disseminate these to local planning bodies and provide ongoing
training and follow up on their use.

Establish and use parameters for written governance, policy and procedures, effective
meeting process and protocols to avoid giving any dominant BoS CoC member or
region undue influence.
I.D.2 Reallocation and Ranking
BoS CoCs should use objective and performance-based scoring criteria, ranking processes and selection priorities that are approved by the CoC in determining the extent to which each project addresses HUD’s policy priorities and local needs. BoS CoCs should reallocate funds to new projects whenever reallocation would improve performance outcomes, reduce homelessness, and increase cost effectiveness as compared to other projects serving similar populations. Reallocation is also a strategy to eliminate lower performing projects, projects that are not serving targeted populations, or meeting local priorities.

CoCs are required to design and implement a collaborative process for their application for the CoC Program Competition. In recent years, HUD has been strongly encouraging (and incentivizing) CoCs to use objective, performance-based scoring criteria and selection priorities to determine which projects will be submitted to HUD as part of the CoCs application.

–HUD SNAPS News Update on Rating and Ranking Tool

Ranking through the CoC Competition is performed in a tiered manner based on performance, priorities, and consistency with HUD goals. BoS CoCs have the opportunity to use the ranking process to select projects for funding (or higher ratings) that are consistent with HUD and local policy priorities, such as Housing First or targeted populations (see HUD’s brief on Housing First in Permanent Supportive Housing).

Challenge
BoS CoCs may not have a clear process articulated for ranking and reallocation.

Action
Develop strategic transparent policies and process for ranking and reallocation with BoS CoC members well in advance of the CoC competition and make any needed adjustments once the NOFA is released.

Reallocation can be an ongoing part of CoC discussions and options throughout the year. Debrief the most recent CoC competition, scores, ranking, and project allocations and publish results. Discuss where the CoC did well, where improvements need to be made relative to HUD and local priorities.
Before the competition comes out, communicate with CoC recipients to seek projects that would be willing to volunteer for reallocating all or part of their projects.

Look at system data to identify needs and gaps, such as housing inventory, project types missing from a region, or target groups that may be a high priority for the CoC (such as chronically homeless individuals, homeless families or youth). Identify potential priorities for new or reallocated CoC projects.

Seek out example policies from other CoCs to review best practices. Watch for national guidance, webinars and notices to monitor best practices.

Set priorities as a CoC for projects that are needed, as determined by the review of needs, gaps, existing project portfolio.

Formulate rating and ranking criteria and scoring for the CoC that are consistent with CoC goals and priorities, using consistent measures.

**Challenge**

Existing recipients serving on the rating/ranking committee can create a conflict of interest or a perceived conflict.

**Action**

Require all Ranking Committee members to sign conflict of interest policies and ensure those conflicts are known throughout the process.

The conflict of interest policy and procedure should be reviewed at the beginning of each meeting to ensure full understanding.

Members must be able to talk openly and transparent about real or perceived conflicts of interest with each other without fear of being removed from the entire process.

**Challenge**

Reallocation decisions are especially hard regarding legacy projects that are not performing well or serving a targeted population.

**Action**

Review CoC project performance data throughout the year and identify those projects that are not meeting performance targets such as cost per PH exit, match, or utilization rates. Poor performance also might be a historical pattern that has been occurring over a period of years, in spite of technical assistance and ongoing monitoring. Identify projects that are not following evidence based practices and CoC priorities such as Housing First, coordinated entry, low barrier approaches, etc.

Identify projects that have unspent funds, or had CoC monitoring issues and consider these for potential reallocation. Work with the local HUD field office to identify projects that have had HUD monitoring issues or findings.

**Challenge**

Disparities in available resources may exist across BoS CoC geography, such as gaps in a certain component type (i.e. some areas may not have any shelter or Permanent Supportive Housing (PSH)).
I. Structure and Operations | Balance of State Continuum of Care Toolkit

**Action**

Use reallocation as an opportunity to address gaps in resources across the BoS CoC, as well as to repurpose funding from projects (or portions of projects) that are not performing well, or no longer meet needs.

**I.E Monitoring**

BoS CoCs are required to monitor and report the performance and outcomes of ESG and CoC projects. Monitoring may include:

- Ensuring that projects are compliant with the CoC/ESG requirements
- Projects meet expected performance measures
- Projects reach their spending targets each month/quarter
- Projects serve eligible persons

A monitoring visit is an opportunity to form and develop good working relationships with a recipient and subrecipient. Discussions can include how the project has been performing, has met needs of local populations, and fits in the overall scheme of the BoS CoCs homeless crisis response system. It also can be a chance to learn about the recipient’s agency, community and local conditions, as well as any challenges, gaps or unmet needs. The option of performance improvement plans, and potentially reallocation, can be introduced here if performance isn’t meeting thresholds or the project doesn’t serve a target population. Important information and contacts can be gleaned to assist BoS CoC operations and networking.

See *Figure 4* below. Create a mantra of “Say It, Do It, Document It” within your project, agency, or Continuum. All three of these structures need to be in place to ensure implementation of the highest quality work.

See *Figure 4* below. Create a mantra of “Say It, Do It, Document It” within your project, agency, or Continuum. All three of these structures need to be in place to ensure implementation of the highest quality work.

"**Say It**" means that staff can describe verbally what they do and how they do it. It should align with what is documented.

"**Do It**" means that staff can and does implement what is documented and what they say they should do. Others should be able to see through staff’s actions what is being implemented.

"**Document It**" means that there is written documentation that supports what is being implemented (i.e. Policies and Procedures, forms, signs in the office, etc.).
**Challenge**

Staff are not trained in monitoring and may not know what to look for, what is considered a significant issue, and what to do with the gathered information.

**Action**

<table>
<thead>
<tr>
<th>Establish a BoS CoC monitoring committee and develop protocols, policies and procedures, and a schedule. Use a form to make it routine and consistent across any staff that will perform monitoring.</th>
</tr>
</thead>
<tbody>
<tr>
<td>When conducting a monitoring visit, include Board members and teams of two people, if possible.</td>
</tr>
<tr>
<td>After a monitoring visit, send follow-up information with any findings, notes and needed corrections.</td>
</tr>
<tr>
<td>Work with the BoS CoC monitoring committee and any recipients that need correction.</td>
</tr>
<tr>
<td>For quality improvement, perform regular training within the BoS CoC to inform of overall monitoring plans, compliance trends, and commonly cited issues.</td>
</tr>
<tr>
<td>Create and provide standard template forms that can be used by each project recipient in the CoC to help with ease of comparison across projects. Use material from the HUD monitoring guide.</td>
</tr>
</tbody>
</table>

**Challenge**

Monitoring a recipient onsite may require hours of travel, time and expense for BoS CoCs.

**Action**

<table>
<thead>
<tr>
<th>To reduce travel, determine which monitoring items can be done remotely.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Have project recipients self-monitor certain discrete items as a capacity building experience.</td>
</tr>
</tbody>
</table>

**Challenge**

Being distant from local planning bodies requires extra effort on the part of the BoS CoC staff to establish relationships and navigate the relationship building efforts, which often occur remotely. Ensuring that monitoring remains a priority for the BoS CoC staff amongst other responsibilities can be hard to navigate.

**Action**

<table>
<thead>
<tr>
<th>Keep it simple! Frequent, less intensive monitoring can be just as effective at identifying and addressing compliance and performance concerns as one large in-person monitoring per year.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Work with Consolidated Plan jurisdictions to share monitoring duties and information in order to reduce burden on the CoC as well as the grantees. One option is to jointly monitor CoC and ESG-funded projects so that recipients have only one annual monitoring.</td>
</tr>
</tbody>
</table>
**Challenge**

Local HUD field offices complete annual risk analyses for all grantees, as well as regular monitoring. Often there is disconnect between the monitoring activities of the local HUD field office and those of the BoS CoC.

**Action**

Monitoring is also a great opportunity to connect with local HUD field offices that are completing desk monitoring and onsite monitoring visits. The local HUD field offices often have good insight and information on compliance issues with recipients and can work with the BoS CoC on collaborative training and project improvement plans.

**I.F Funding**

Funding and resources to support the work of the BoS CoC is an important conversation for the entire CoC to have. It should not solely be the responsibility of the CA to ensure there is enough funding to support the necessary staff and other expenses to complete the work of the CoC. The CA can apply for the CoC planning grants each year. Some BoS CoCs are ‘sponsored’ by state agencies that act as the CA and provide additional staff resources to accomplish the activities beyond what CoC Planning funds would support. Also, many nonprofits have ‘housed’ the function of the CoC coordination as part of agency staffing operations, effectively providing additional staff and administrative capacity beyond CoC planning funds for the activities of the CoC. Other CoCs look for sources of support from local United Ways, corporate partners, and other entities.

Per the HUD CoC Program interim rule, HUD lists eligible planning costs for the Continuum of Care under § 578.39(b) and (c). The McKinney-Vento Homeless Assistance Act allows no more than 3 percent of the Final Pro Rata Need (FPRN), or a maximum amount to be established by the NOFA, to be used for certain costs. These costs must be related to designing a collaborative process for an application to HUD, evaluating the outcomes of funded projects under the Continuum of Care and Emergency Solutions Grants Programs, and participating in the consolidated plan(s) for the geographic area(s). Accessing dedicated resources that will support staffing for BoS CoC activities beyond CoC planning grant funding is difficult and was identified in a recent survey as one of the top challenges for BoS CoCs. Many agencies are stretched across many counties and are not able to take on additional activities without payment.
I. Structure and Operations | Balance of State Continuum of Care Toolkit

### Challenge

BoS CoCs may not have staff with time to perform all of the activities required by the CoC Program Interim Rule.

### Action

- **Explore the possibility of a state, nonprofit, or local entity functioning as host to the CA to assist with staffing.**
- Seek additional funds through various philanthropic sources (statewide, community, or topical), grants from corporations (local banks with Community Reinvestment Act responsibilities, hospital or health systems with community benefit obligations, utility and insurance companies) or develop an online campaign for specific needs.
- Seek out additional sources of support for CoC activities from local family foundations or benefactors (such as the Gates or Walton foundations, private or faith-based funding).
- For activities such as conducting research, website maintenance, document creation, or event planning, seek out the assistance of college student interns or relevant university departments such as Social Work, Urban and Regional Planning, and Public Administration.

### Challenge

The sheer size of the geography of the CoC may be a challenge for communication, coordination, and implementation.

### Action

- Consider hiring a CoC staff person who can work remotely within specific regions of the BoS. The staff could be embedded in local agencies or rotate amongst several counties to decrease travel.

### Challenge

CoC planning grants are normally applied for one to two years in advance of actual operations. Therefore, project applications are being created by BoS CoCs for planning funds, without truly knowing what the planning needs will be in two years.

### Action

- Create a multi-year funding and tasks plan based on CoC priorities that still provides flexibility for using the planning grant funds if or when priorities switch throughout that time period.

### I.G Policies and Procedures

Written CoC Program policies and procedures help the BoS CoC and recipients:

- Articulate a common vision
- Set priorities
• Assure operational uniformity
• Describe program implementation
• Set standards for CoC assistance

These standards include adherence to Federal regulations such as Fair Housing and Equal Access, and application of Housing First and low barrier approaches, tenant choice, and quality requirements of housing and services. Policies and procedures should be kept updated and reviewed on an annual basis to ensure that they still reflect current practices, operations, and standards.

**Challenge**
Lack of clear, outdated or non-existent guidance in operating policies and procedures within the BoS CoC leaves recipients and members to their own interpretations.

**Action**
Utilize the many online examples for CoC policies and procedures, which enable a BoS CoC to begin with a template and customize from there. Perform a web search with the key terms “CoC Policies and Procedures”.

Request HUD technical assistance to help create CoC standards, and policies and procedures.

**Challenge**
Lack of staff capacity or resources may be a constraint to establishing and updating current, effective policies and procedures.

**Action**
Form a task group to work on updating policies and procedures, which could include at least one Board member and one representative from each region in the BoS. The task group should make recommendations to the CoC membership for revisions.

**Challenge**
BoS CoCs must coordinate with all the local planning bodies and regions to assure that any policies and procedures written are all-inclusive and are effectively and equitably implemented.

**Action**
Develop a policy template that local planning bodies or regions can adapt for local use.
SECTION II
SYSTEMS APPROACH IMPLEMENTATION
II. Systems Approach Implementation

Ending homelessness requires a systems approach to planning, evaluation, and service delivery. By definition, BoS CoCs encompass large geographies with multiple, distinct communities that may not view themselves as part of a larger system of funding, administration and oversight. While a consolidation of distinct communities into a larger system may seem artificial or strained, it provides the infrastructure to perform the data management, quality control, and planning activities necessary to optimize the homeless crisis response system in individual communities. Additionally, approaching BoS CoCs as one system can provide a mechanism to test, scale, collaborate and innovate in a way that is not possible in CoCs confined to one distinct community. BoS CoCs that can embrace this approach and manage it through effective planning, collaboration and communication can unlock this potential for greater impact over the entire geography.

In this section, a description of challenges and actions are provided to help BoS CoCs implement a systems approach through engaging and communicating, using system level data, operationalizing Housing First, increasing affordable housing, providing support services, ensuring outreach coverage and increasing operational efficiency through CoC mergers.

II.A Stakeholder Engagement and Communication

Engagement and communication can always be a challenge, even when stakeholders are able to regularly sit in the same room with each other. Large geographies and the number and variety of stakeholders involved presents a unique challenge for BoS CoCs and an even greater need for effective communication that fosters engagement with and commitment to CoC goals and priorities.

The following Figure 5 diagram depicts the stages of integrating two or more stakeholders into a system. The role of the CoC is to bring stakeholders together to create a coordinated community response. Determine where the stakeholders in your CoC are in these stages and work step-by-step to get them to the finish line.
Challenge
Difficulty communicating effectively across large, diverse geographies.

OR

Lack of control over how priorities, instructions, and overall messaging are distributed across stakeholders in the system.

Action

Be strategic when deciding whether a meeting should be in person or virtual.

Rotate in person meetings to different regions throughout the year.

Establish consistent rules and practices for how meetings are staffed, run, and documented.

Create a communication policy and reference tool – and keep it updated. A communication policy outlines what technology is used, how to access agendas and meeting notes, who is responsible for distribution of communications, where to go with questions, and other important information related to communication within your CoC.

Use digital tools for communication, remote meetings and document storage.

Solicit input using critical thinking concepts and tools.

Challenge
Lack of knowledge of the key service providers, political officials, funders and other stakeholders in each community and the local dynamics of how they work together.

OR

Variability in the types of organizations and authorities within local jurisdictions and regions. For example, on-the-ground leads for homelessness assistance could be local governments, nonprofits that serve multiple counties, faith-based groups or a combination within one region.

Action

Track engagement attempts and outcomes of key stakeholders over time to prioritize and manage key partnerships. Additionally, tracking different types or ways you attempted to engage a stakeholder and whether it worked or not will inform your efforts for continued engagement with that stakeholder as well as how you might engage new stakeholders.

Connect participation in the CoC with eligibility for other local, private or state funding.

Work to understand the missions, funding, and coverage areas of the varying types of entities leading homelessness assistance in order to effectively engage them in the work of the CoC.

Challenge
Mistrust between the regional and CoC level structures can create an unproductive “us versus them” dynamic that may inhibit transparency and honest communication.
**II. Systems Approach Implementation**

### II.B System-Level Data Collection and Use

Critical to implementing a systems approach to addressing homelessness is harnessing the power of data to assess the need and measure progress towards outcomes. The primary ways that BoS CoCs do this is through year-round collection of HMIS data and annual PIT counts. With a focus on collecting and reporting data to meet funder requirements, sometimes it is easy to lose sight or deprioritize regular analysis of data at the system level. System-level data is different than project-level data because it looks across projects in order to understand the experience of individuals and families entering and exiting your system, wherever they may present or be served. Without a good understanding of this experience, BoS CoCs are limited in how they can operationalize an effective coordinated and systemic response to homelessness and housing crises.

**Challenge**
Ensuring full coverage over large geographies both in terms of PIT count data collection as well as bed coverage in HMIS.

**Action**
- Increase HMIS bed coverage through education and incentives for non-funded providers. For example, creating an agreement with a faith-based provider to provide a staff person to meet regularly with clients as part of coordinated entry to collect and enter data. Or consider providing a stipend to cover costs of a non-funded provider’s data collection efforts.
- Work with other funders, especially the state, to make HMIS participation a requirement of receiving funds.

**Challenge**
Ensuring PIT count data collection is standardized for data quality and flexible for local contexts and capacity.
II. Systems Approach Implementation | Balance of State Continuum of Care Toolkit

**Action**

<table>
<thead>
<tr>
<th>Create standardized PIT count materials that can be adapted for local regions. For example, create templates for marketing the PIT count to community partners, standard data collection instruments, training, and instructions.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide PIT count and HMIS user training virtually. Record HMIS trainings so new staff may access as they are hired throughout the year.</td>
</tr>
<tr>
<td>Identify an individual in each region to lead the efforts for the PIT count. Create a written description of this role that outlines duties, responsibilities, timelines, and expectations for communication.</td>
</tr>
<tr>
<td>Utilize volunteer organizations such as AmeriCorps VISTAs and NCCC members to increase coverage for PIT count as well as analysis capacity.</td>
</tr>
</tbody>
</table>

**Challenge**

Using HUD System Performance Measures to evaluate performance over large geographies and separate and distinct local communities.

**Action**

<table>
<thead>
<tr>
<th>Review system performance data frequently. Looking at your data at least monthly can help increase data quality and increase the skills of your stakeholders in analyzing and understanding what the data mean.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Using HUD’s System Performance Measures, evaluate system performance at the regional level. This may require your HMIS lead or software vendor to create a separate report. Be mindful in your analysis of the local context, especially when it comes to bed coverage. It might not make sense to use the same evaluation criteria if there are only one or two contributing providers in a given region.</td>
</tr>
</tbody>
</table>

**Challenge**

Accessibility of BoS CoC HMIS data at a local or regional level in terms of availability and frequency of reports.

**Action**

<table>
<thead>
<tr>
<th>Work with your HMIS staff and/or software vendor to create filters or drill downs into system-level reports that allow for local/regional level reporting. You may first have to add a project-level descriptor data element for location.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Share project data across the CoC. Use this as an opportunity to talk with each agency about its data quality and whether the data that will be published is reflective of their work. Transparency can be very effective to getting errors corrected.</td>
</tr>
</tbody>
</table>

**Challenge**

Capacity to analyze data both in terms of assessing data quality as well as identifying areas for improvement.
II. Systems Approach Implementation

**Action**

<table>
<thead>
<tr>
<th>Activity</th>
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<tbody>
<tr>
<td><strong>Partner with a college or university to help with data collection and analysis.</strong></td>
</tr>
<tr>
<td><strong>Use a participatory analysis approach to reviewing your system level data – meaning, involve your project leads, key stakeholders, and consumers in analyzing your data. This has two primary benefits: 1) better and deeper analysis of what the data show and 2) creates buy-in for data collection and analysis.</strong></td>
</tr>
<tr>
<td><strong>Use <a href="#">HUD’s Continuum of Care GIS Toolkits</a> to create maps and visualizations of your system that can then be used to layer additional data. For example, you could map your coordinated entry access points to demonstrate coverage and gaps and then layer additional data related to resources, housing needs, demographics, etc. Additional analysis could be made if you have access to ESRI GIS software through your agency or a partner.</strong></td>
</tr>
<tr>
<td><strong>Use a business intelligence software</strong> to create visualizations of your data.</td>
</tr>
</tbody>
</table>

**II.C Housing First**

Housing First is a proven approach to ending homelessness. Within a systems approach, this means that not only are projects themselves operating with fidelity to the Housing First model, but the CoC has adopted Housing First principles within every aspect of how they coordinate assistance. While Housing First principles are included within all topics of this Toolkit, this section will focus on challenges and actions related to building the necessary infrastructure for adopting Housing First system wide.

**Challenge**

Providers that are resistant or lack the knowledge or capacity to implement Housing First within their projects. Organizational missions, history and purpose may not directly align with Housing First, leading to a mismatch of priorities and direction.

**Action**

<table>
<thead>
<tr>
<th>Activity</th>
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<tbody>
<tr>
<td><strong>Create a Housing First Task Force to lead communication and training efforts and serve as the go to group to address implementation challenges with Housing First.</strong></td>
</tr>
<tr>
<td><strong>Evaluate whether your system is Housing First oriented and use the results to create a work plan to meet the criteria.</strong></td>
</tr>
<tr>
<td><strong>Identify champions to carry the message to include tenants, national experts, and local leaders.</strong></td>
</tr>
<tr>
<td><strong>Offer training on Housing First regularly throughout the year. Mandate the training for key positions, such as outreach and coordinated entry staff, case managers, supervisors, and housing specialists.</strong></td>
</tr>
<tr>
<td><strong>Identify incremental steps to implementing Housing First to assist organizations in managing and experiencing the shift. For example, you can start by asking organizations to reduce two barriers within the next two months and then evaluate</strong></td>
</tr>
</tbody>
</table>
their experience and outcomes. Provide support along the way to troubleshoot challenges.

Partner Housing First providers with non-Housing First providers in your CoC as a mentor/mentee relationship.

Engage and educate private and philanthropic funders so they can better support organization and projects that adopt and implement Housing First approaches. Flexible resources are critical to ensuring the success of Housing First projects, so helping private funders understand the gaps and the best ways they can support efforts can help advance systems change.

**Challenge**

Lack of capacity to provide wrap-around services fundamental to a Housing First approach which can both jeopardize tenant success and alienate needed partners, such as landlords.

**Action**

Work with projects to create dynamic, flexible staffing and services that allow them to ‘dial up, dial down’ the amount of services provided to participants based on their need. Not every participant needs everything, and some need different things at different times. Projects should not create ‘cookie cutter’ services.

If a project cannot provide the level of services needed, they should partner with other agencies in the community to provide the needed services.

**Challenge**

Weak connections and alignment with mainstream systems such as health care, social services, criminal justice, and workforce development that create barriers for clients accessing supports essential to long-term stability in housing.

**Action**

Establish relationships with mainstream service partners. At the CoC level, establish relationships with the state-level representatives from these agencies and use these relationships to help support and connect with local counterparts.

**II.D Affordable Housing**

Key to implementing a systems approach to ending homelessness is access to affordable and safe housing options. Although this is a challenge among all CoCs and communities, BoS CoCs face unique challenges and opportunities related to their geographic diversity. On one hand, BoS CoCs have to be attuned to a variety of housing markets – from small rural communities grappling with little, and often substandard housing stock, to suburban and metro areas with potentially high cost, low vacancy housing markets. On the other hand, BoS CoCs are often well-positioned to educate and advocate at the state level for federal and state resources for the production and preservation of affordable housing. BoS CoCs that can understand the varying local needs and then communicate on a larger scale to statewide
funders, developers, and other partners, may see faster gains in affordable housing production in support of their homeless assistance efforts.

**Challenge**

General lack of affordable, rental housing stock.

OR

Overcrowded housing where several families are living in one housing unit, leading to health and safety issues, potential evictions, and literal homelessness.

**Action**

Explore becoming a nonprofit sponsor or owner of affordable housing development. Most state Low-Income Housing Tax Credit (LIHTC) Programs award additional points or have set asides for projects with nonprofit owners. This not only creates a more competitive project, it may also help ensure that the project will continue to operate as affordable housing after the end of the required affordability period.

**Challenge**

Substandard rental housing that needs replacement, rehabilitation or repair in order to meet Housing Quality Standards.

OR

Older federally assisted rental housing stock may be at risk due to expiring affordability periods and a lack of incentives to preserve and recapitalize. Rural federally-assisted rental housing may require substantial and costly rehabilitation and coupled with declining populations and weak market demand, these projects may not be able to support the debt needed to refinance and rehabilitate the properties without a significant amount of soft funds.

**Action**

Connect and partner with other available housing resources and organizations that provide rehabilitation, weatherization, and home repair. This can include local Community Development Corporations (CDCs), Community Action Agencies, Department of Energy funded Weatherization Assistance providers, local Habitat affiliates, and the faith community. Through these partnerships, existing rental stock may be repaired or rehabbed to meet Housing Quality Standards and be used to house a client, while improving the housing stock in the community.

Create a flexible funding source that can be used to fund improvements to bring housing stock up to Housing Quality Standards.

Work with landlords of rental housing that needs repair to target volunteers to help make improvements to meet Housing Quality Standards.
Challenge
Competitive rental markets that favor tenants without the potential and perceived restrictions and regulations that come along with working with government housing subsidies.

OR

Lack of landlords willing to rent to clients. Smaller landlords with more limited budgets may be more cautious of taking perceived risks related to serving vulnerable clients.

Action
Explore shared housing options for clients in your system. It can be tricky to find the right match of clients that are suited to live together, but it can create opportunity and stability for the right tenants. Try exploring mutually beneficial shared housing options that may pair younger adults with elderly individuals or families that may be able to assist each other with childcare.

Work with your local and state partners to add source of income as a protection within state fair housing law. This can help prevent landlords from discriminating against tenants who utilize rental subsidies.

Centralize your landlord engagement efforts to reduce confusion and exhaustion among landlords and ensure consistency of messaging and incentives provided.

Engage and educate state and local government partners to ensure alignment, including your Housing Finance Agency, LIHTC investors and syndicators, and other funders of affordable housing.

Challenge
The location and accessibility of affordable housing is outside of client support networks or not in proximity to needed services.

Action
Explore state and local inclusionary zoning requirements that require production of affordable rental housing within all new housing developments and or other commercial and economic developments.

Challenge
Lack of access to Public Housing Authority (PHA) resources due to scarcity of the resource and/or lack of prioritization within PHA Programs for people experiencing homelessness.

Action
Develop partnerships with HUD Multifamily Property managers and owners, and advocate to reduce screening criteria and implement homeless preferences.
II. Systems Approach Implementation | Balance of State Continuum of Care Toolkit

II.E Provision of Support Services

Essential to implementing a Housing First approach is providing housing focused supportive services throughout an individual or family’s pathway from housing crisis to housing stability. A systems approach to providing support services within a BoS CoC means that the services available and delivered are all focused on one outcome – obtaining and maintaining housing stability. This goal is best achieved by a system that embraces and implements a person-centered approach. To optimize and ensure quality services, BoS CoCs must embrace and hold themselves accountable to providing services that achieve the outcomes their clients deserve.

**Challenge**

Lack of qualified, trained, supportive service providers.

**Action**

Use volunteers / neighbors / peer specialists to assist with well checks, allowing professional and clinical services staff to reduce frequency of visits to tenants.

**Challenge**

Time and expense of transportation costs can lead to less frequent service provision as well as increased costs.

OR

Lack of public transportation options for tenants.

**Action**

Incentivize friends, family members, and volunteers to provide transportation to tenants. For example, you could provide gas cards to families and friends to help tenants go to doctor’s appointments.

Explore ride shares or create community ride shares to assist with client transportation.

Be sure to add accurate transportation costs to your budget. Seek out grant funding or create a ride share program. These contributions could potentially be used as match for your CoC Program-funded projects.

**Challenge**

General lack of services, particularly in rural areas where amenities such as shopping, transportation, recreation, employment services, and health providers may be located far from tenant residences.

**Action**

Explore virtual and telehealth models for supportive service delivery.
Deploy staff by geography, not funding source. Use staff to perform both outreach activities and supportive service case management to reduce transportation costs and time.

Use Critical Time Intervention model to quickly connect tenants to nearby community supports.

**Challenge**

Difficulty in securing match resources for services in order to support CoC Program-funded housing assistance.

**Action**

Consolidate, centralize, and contract services to flexibly meet demand and ensure quality. Consider centralizing scattered site PSH and RRH administration to cover the entire geography to better meet the need where the need presents. For example, A BoS CoC could have a CoC-wide scattered site PSH project that allows the resource to be used across the area. Financial assistance could be administered centrally, while housing location services and supportive services could be subcontracted out to local organizations.

**II.F Outreach**

Outreach within a homelessness response system includes practices to identify individuals and families in need of assistance with a housing or homelessness crisis. Often this takes two primary forms: 1) direct outreach to individuals living on the streets or other areas not meant for human habitation and 2) disseminating information and establishing relationships with community partners so that when partners encounter people experiencing homelessness, they know how to direct them to the CoCs access points to get assistance. Implementing regular, comprehensive outreach is a struggle for most CoCs, regardless of their size or urban/rural composition. However, BoS CoCs face additional complexity in defining and right-sizing their outreach efforts due to their varying geographies.

**Challenge**

Outreach is not currently involved in coordinated entry implementation.

**Action**

Initiate the processes for discussing, developing, and implementing coordinated entry process changes within the BoS CoC. These efforts can originate with a coordinated entry process committee, if one exists within the BoS CoC. Invite outreach teams to collaborate in the change efforts. Outreach teams should be included in any planning involved with changing or expanding the definition of outreach.

BoS CoCs can use some of the planning questions focusing on access points that are identified within HUD’s resource, [Coordinated Entry Core Elements](#).

Strategize on how to approach mainstream system providers with the opportunity for them to serve as access points. The United States Interagency Council on
Homelessness’ (USICH) “Enlisting Mainstream Resources and Programs to End Homelessness” offers a list of key systems that would be beneficial to approach for partnerships.

Identify methods of communicating any changes to all outreach staff members.

Lastly, the CoC should approve the policies and procedures before they are utilized. The written standards must also be updated by the BoS CoC in order to reflect this change.

**Challenge**

Consistency of outreach among local regions.

OR

When a person is identified, shelter and housing assistance may not be readily available – leading to a lack of motivation to conduct outreach.

**Action**

At the CoC level, create outreach material templates for different audiences that providers at the region or local level can tailor and use to educate community partners and the public. For example, a working group under the BoS CoC Board could create a template flyer or informational guide for local law enforcement and then disseminate to all regional groups for local contact information to be added.

Clarify the role and importance of outreach activities within the systems approach. Outreach is critical to identifying the most vulnerable people who need assistance, regardless of whether a shelter or housing resource is immediately available.

Engagement and trust building are essential to the housing process and outreach activities should be proactive, honest, and trauma informed. Material provisions such as food, blankets or clothing are not a replacement for housing; however, they may be a critical part to an overall engagement strategy.

Provide maps to local regions that can be used to track outreach coverage throughout the year, including where people were identified, to understand if there are specific hot spots where more regular outreach should be conducted by provider staff or community partners. Collect and analyze the maps to understand gaps in coverage as well as high performing outreach activities across the BoS CoC.

**Challenge**

Lack of trained outreach workers.

**Action**

Deploy staff by geography, not funding source. Use staff to perform both outreach activities and supportive service case management to reduce transportation costs and time.
**Challenge**

Perceived safety concerns with the work and lack of knowledge of solutions to address worker safety as well as accurate understanding of the myths associated with the target population.

OR

Community partners that lack the knowledge and understanding of the target population.

**Action**

<table>
<thead>
<tr>
<th>Dispel myths associated with people experiencing homelessness while also educating paid and unpaid outreach workers and community partners on ways to protect themselves and clients during engagement attempts.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Educate and develop a process where local police, sheriffs’ offices, national and state parks and resource management organizations, game wardens, and other agencies that may come across unsheltered people experiencing homelessness know who and when to call when they come across encampments, people who may be living in cars, or other unsheltered people.</td>
</tr>
<tr>
<td>As part of your marketing your coordinated entry, educate community members on where to call and report if they come across people who may be living in unsheltered situations.</td>
</tr>
<tr>
<td>Post informational fliers with contact information at entrances to national and state parks and forests, hiking trails, and other strategic areas, including public restrooms and rest stops.</td>
</tr>
</tbody>
</table>

**Challenge**

Local policies that criminalize homelessness, leading to vulnerable people being more likely to hide their circumstances and location.

**Action**

Advocate for changes to local and state policies that criminalize homelessness. Use [HUD’s Resources on Decriminalizing Homelessness](https://www.hud.gov) in your advocacy efforts.

**II.G Mergers**

HUD strongly encourages CoCs to merge where it is appropriate. HUD has determined that the merger of one or more existing CoCs into a new larger CoC can result in improved coordination of services, effective HMIS implementation, more efficient resource allocation and planning, and improved competitiveness for new resources. Merging smaller CoCs into a larger CoC also reduces the administrative burden of applying for funding at the local level and reviewing funding applications at the national level.

BoS CoCs may be presented with merger requests more often than other CoCs – and may be in a better position to accommodate requests – due to their geographies and existing structures. If approached with thoughtful planning, mergers can prove beneficial to a BoS CoCs system response to homelessness. In some cases, a region or locality within a BoS CoC may request to leave the CoC and join a neighboring...
II. Systems Approach Implementation | Balance of State Continuum of Care Toolkit

CoC, or in more extreme cases, to not be part of a CoC at all. For the former, this might make sense if the geography has experienced growth and now views itself as more connected to a larger metro area. In the latter instance, where a region may request to become a smaller, independent CoC or opt out of the CoC Program altogether, this can have negative effects on the people experiencing a housing crisis in those areas and should be avoided. These circumstances are rare and tend to yield fewer benefits than anticipated. Often it is critical that CoCs talk with this smaller jurisdiction about how to ensure their locality receives appropriate representation in the CoC but maintains local autonomy.

**Challenge**

- Perceived conflicts of interest in evaluating and discussing merger conversations.
  
  OR

- Time and capacity to manage a merger planning process and build relationships with leaders and organizations new to the BoS CoC.
  
  OR

- Potential negative impact on performance from a lower performing CoC joining the BoS CoC.

**Action**

- Communicate HUD merger priorities and discuss options for joining an existing neighboring CoC.

- Establish a merger committee to lead both exploratory and planning efforts. Explore use of a third-party mediator to lead efforts and mitigate conflicts of interest.

- Create a budget for merger activities and identify resources.

- Prior to planning a merger, develop policies and procedures for determining how funding and resources will be supported during a merger (i.e. will the leaving jurisdiction take ‘their’ projects and funding with them or does that stay with the BoS).

- Evaluate the requesting CoCs performance, projects, and structure and leadership. How are they structured? In what areas is the CoC strong? Weak? Conduct a full analysis in order to assess potential training, project consolidations, and leadership development needs.

- Create a time line of merger activities that outlines all the steps to secure board approval, transfer data, and notify the public and other stakeholders.

- Read the current year’s Notice of Funding Availability (NOFA) to see what incentives HUD is providing for merging.

- Review HUD’s [CoC Mergers – What to Consider? Guide](#).

**Challenge**

- Potential loss of funding from a geography leaving the BoS CoC.
### Action

<table>
<thead>
<tr>
<th>Contact your HUD Field Office, Desk Officer, and any TA Provider that you are currently working with.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evaluate and communicate the impact of the community leaving the CoC on projects, participants, and the CoC as a whole.</td>
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</table>
SECTION III

COORDINATED ENTRY
III. Coordinated Entry

A coordinated entry process is a crucial platform for the drive to end homelessness, and CoCs are required by HUD to develop and implement a process that is easily accessible and effective at assessment, prioritization, referral, data management, and evaluation. This section will identify challenges as well as tools and resources a BoS CoC can utilize to enhance its coordinated entry process, particularly focusing on policies and procedures, implementation, participants, and funding.

III.A Coordinated Entry Policies and Procedures

BoS CoCs’ coordinated entry policies and procedures are a crucial guide for ensuring that participants receive quality, uniform treatment from trained providers who are aware of their role in the overall process. This is especially significant for BoS CoCs that are unable to provide regular implementation training in-person or via phone given large geographies or the number of persons operating the coordinated entry process.

III.A.1 Prioritization

In order to use resources as effectively as possible, CoCs should prioritize prospective participants based on a set of factors that are established when setting up policies and procedures. Prioritization is based on a person’s level of vulnerability and need as documented in an assessment. This process should be applied consistently across the CoC and be based on specific criteria that are publicly available.

Challenge

A BoS CoC may be unsure of whether the planned or implemented prioritization policies and procedures are reflective of HUD’s guidance, especially if there are multiple coordinated entry processes within one BoS CoC.

Action

Review Section III A of Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in PSH, which indicates that CoCs with multiple defined geographic areas established for planning, housing, and service delivery only need to ensure each geographic area prioritizes assistance within their own areas. A BoS CoC should determine if this method would be beneficial for their entire constituency, and ensure their written standards are updated and approved by the CoC.

In order to build trust within areas of a BoS CoC that are not yet sure if a prioritization process will work in their communities, a BoS CoC can demonstrate what the prioritization process is able to accomplish by presenting at various stakeholder meetings using data from local and peer communities to show success on local and national levels. BoS CoCs can use the tool “Abilities of Prioritization,” which is a
Initiate a local 100 day challenge to facilitate implementing changes locally. The challenge consists of adopting a practice for 100 days through small, incremental goals. For instance, an initial goal in the 100 day challenge could be to place 10 persons experiencing chronic homelessness into permanent housing by a specific date, and then try placing 20 persons through this method. The change processes are led by leaders that are local to the region undergoing change, which capitalizes on local knowledge and capacity. BoS CoC staff members and the local leaders collaborate on ideas throughout the process which helps address any local hesitation to adopting new practices. (See Figure 6 below for the steps of a 100 day challenge, and view HUD’s Ending Youth Homelessness Guidebook Series: System Planning, Tool 8 for further implementation details.)

### Figure 6: Steps of a 100 day Challenge

1. Conduct rough & ready Mapping of the Existing System
2. Validate menu of outcomes with key Leaders (Providers & Agencies)
3. Decide on Areas of Focus for the 100-day Challenge
4. Launch 100-day Challenge
5. Support Team during the 100-day Challenge
6. Harvest the Learning and Plan the Next 100-day Challenges

For BoS CoCs: Decide if you will work as a full CoC or split out into regions
It may be challenging for some agencies in the BoS CoC to change to a new housing placement process that is based on prioritization rather than familiar processes based on the method of first-come-first-serve. Some agencies may be hesitant to change to the new processes and will need encouragement to do so.

**Action**

Review an updated Active List each week in the coordinated entry process committee. Post the Active List in a shared and secure location, such as a Google Drive folder, and keep notes on progress housing potential participants, such as the date of a meeting with a landlord, so that next steps are clear for those accessing the Active List.

Continually refine the Active List so that the BoS CoC can identify potential participants’ current statuses when needed.

**Challenge**

Relying on local providers across the full geographic area of a BoS CoC to collect documentation presents a challenge if some of those providers do not have the capacity to perform this role. This can particularly impact BoS CoCs since providers’ capacity levels may vary within a specific region or between regions, which means BoS CoCs need to strategize on increasing capacity across multiple systems.

**OR**

BoS CoCs may have numerous formats of documentation in use across the BoS. This poses a challenge for monitoring documentation requirements since each unique format would need to be reviewed for compliance with regulations. BoS CoCs may need to ensure that the verification methods used at each project are compliant.

**Action**

Consider creating standardized documentation verifying chronic homelessness and length of time homeless across the BoS CoC. This can increase projects’ capacity since they would avoid spending time creating unique templates and can streamline the coordinated entry process since there would be fewer unique forms to interpret throughout the process.

Utilize the examples of chronic homelessness and length of time homeless documentation from other communities that are included in this Toolkit.
CoCs using HMIS for their coordinated entry process data management system may benefit from regularly uploading chronic homelessness and length of time homeless documentation. This ensures there is one, easily accessible location for documentation, reducing the burden of collecting documentation more than once and therefore increasing the capacity of homeless service providers.

III. Coordinated Entry Implementation

Policies and procedures are part of the foundation for implementing a coordinated entry process, even though implementation will look different across CoCs. Common challenges that BoS CoCs may experience include addressing large geographic areas, staffing, consensus, and consistency.

III.B.1 CE for Large Geographic Areas

**Challenge**

Per the Coordinated Entry Policy Brief, a CoC must establish fair and equal access to its coordinated entry process for everyone within its geographic area. BoS CoCs therefore need to consider how prospective participants can easily access the system from anywhere within the area, which includes from rural to urban areas, and gain cooperation from all of those communities to support either physical or virtual access points.

**Action**

To address the challenges of ensuring Fair and Equal Access and equally meeting the needs of multiple geography types, BoS CoCs may benefit from developing multiple coordinated entry processes. Page 4 of the Coordinated Entry Policy Brief suggests that the combined geographic areas covered by multiple coordinated entry processes within a BoS CoC could serve as a means to both fully cover its large geographic areas and prevent situations of prospective participants accessing services in other parts of the BoS CoC when services are locally available. Section 1.5, page 24, of HUD’s Coordinated Entry Core Elements guidebook expands on this consideration by describing the challenges and strengths of a regional approach to developing coordinated entry processes, which includes the ability to better meet the needs of various geography types.

**Challenge**

BoS CoCs may encounter the challenge of establishing a person-centered coordinated entry process due to perceived ownership of resources or transportation barriers. For instance, some communities may view resources in their geographic area as their own, rather than as resources that should be shared across the BoS CoC.

**Action**

Share data from the coordinated entry process with providers to show that the process can be successful. This is an especially helpful practice with rural providers that may doubt the coordinated entry process can work in their rural communities and may ultimately lead to an increase in geographic coverage of the CoCs coordinated entry process.
BoS CoCs can also increase the accessibility and capacity of their coordinated entry process by redefining outreach. For instance, considering street outreach workers as access points gives flexibility in comparison to having only physical buildings. Additionally, mainstream system providers can serve in outreach roles, which increases a CoCs reach to persons who may not otherwise connect with the housing crisis response system.

**Challenge**
It may not be possible for prospective participants to access the coordinated entry process in one geographic area of the CoC and then be placed in housing in another area of the CoC if there are limitations with availability or cost of transportation. Both of these issues hinder prospective participants’ ability to make choices in decisions impacting their lives.

**Action**
Virtual access points can reach prospective participants who may not be able to present at a physical access point, particularly when prospective participants are in large geographic areas with limited transportation options. Seek out partners who may be able to assist in establishing a virtual access point at limited cost.

Engage in a person-centered practice by allowing prospective participants to join more than one Active List. A participant can then choose to move to the geographic area where they reach the top of that community’s Active List as long as they are able to cover the costs of moving to another region.

**III.B.2 Staffing**
Another significant aspect of implementing the coordinated entry process is determining and meeting staffing needs. BoS CoCs need to think strategically about how to best staff the coordinated entry process from a statewide perspective and various regional perspectives. For instance, a staff position and associated competencies needed in one region of the state may not be important in another. In this situation, BoS CoCs must decide to what extent positions and qualities can be standardized across the geographic region.

**Challenge**
BoS CoCs may experience difficulties while agreeing upon, standardizing, and maintaining basic requirements of their assessors, such as minimal education, competency, and experience.

**Action**
Job descriptions should include education, experience, and competency requirements levels agreed upon by the BoS CoC.

Annually evaluate requirements in order to address the staffing requirements of the assessment phase and to ensure that the persons operating the coordinated entry process have sufficient education, experience, and competencies to meet the CoCs’ current needs.
Challenge
If a BoS CoCs relies on a single entity to implement the operations of the coordinated entry process, challenges will arise if that entity is performing poorly.

Action
Release an RFP to seek and evaluate vendor(s) capable of managing the coordinated entry operations. This can assist with identifying current implementation issues and corrective actions if the CoC chooses to retain the current entities in the role.

III.B.3 Consensus within the CoC
Decisions made about the coordinated entry process should be based on the joint recommendations from a variety of stakeholders within the BoS CoC. Given the multiple stakeholders and opinions providing input, disagreements will likely occur. In these instances, BoS CoCs will need to have established written processes for addressing disagreements that demonstrate respect for all opinions while also leading the CoC toward decisions.

Challenge
A BoS CoC may experience challenges with forming consensus while developing the assessment process. Urban and rural areas within the BoS CoC may have varying levels of resources while local planning bodies/regions will have opinions on processes that would be most effective in their local communities.

Action
The Consensus-Based Decision-Making Process document included in this Toolkit can serve as a guide for CoCs interested in following decision processes. The document also describes how groups can follow the process of “Consensus-Minus-One,” which allows the group to make a decision with all but one in agreement.

Create or restructure committees so that they are capable of addressing challenges with implementing both local and overall BoS CoC requirements such as HMIS and can serve as forums for reaching consensus on decision points. The Results Based Facilitation – All in One Agenda included in this Toolkit can be used at committee meetings to discuss challenges, successes, solutions, and next steps.

After decisions are made between partners on their roles within the coordinated entry process, capturing these decisions in partnership agreements can clarify any future confusion over responsibilities and increase accountability.

Developing and performing an evaluation of the coordinated entry process can generate a shared understanding of strengths and weaknesses, thus facilitating collaboration on improving the process. BoS CoCs that need guidance and increased capacity for evaluations can consider releasing an RFP seeking a vendor(s) for evaluating a coordinated entry process. Prospective participant surveys can also develop agencies’ shared understanding of issues or successes existing within their coordinated entry process.
Challenge
BoS CoCs may encounter providers and communities that are used to working independently so will need encouragement to move toward working collaboratively across multiple providers and larger systems.

Action
In-person meetings with partners and providers in the BoS are especially helpful at the start of planning and subsequent major changes in order to encourage collaboration. During these meetings, attendees can create a work plan with goals and action steps for implementation.

Challenge
Grievance processes should be implemented immediately in order to address any issues that arise throughout the coordinated entry process.

Action
A BoS CoC can approach the need to create processes for addressing grievances with specific stakeholders in mind. For instance, there may need to be a form and process for participants that differ from what is needed for a member agency. Community examples of grievance forms and processes are included in this Toolkit.

III.B.4 Consistency
Maintaining consistency when needed within the coordinated entry process is an important driver for providing fair and equal assistance to prospective participants across the BoS CoC. It is possible that without appropriate guidance, whether through trainings or written policies and procedures, uniform treatment will not occur. For instance, assessors may read certain questions differently or interpret prioritization policies multiple ways. Resources can assist BoS CoCs with taking steps to ensure consistency is developed and maintained to the best of their ability.

Challenge
Developing and maintaining consistency throughout the coordinated entry process is a challenge. Consistency does not have to be the CoCs goal for every aspect of the coordinated entry process. The BoS CoC will need to determine what can fluctuate and how much.

Action
In order to identify when consistency is necessary in the coordinated entry process, actively seek input from persons with roles in operating the process. For example, assessment should be consistent throughout, though assessors might recognize that outreach workers need to serve as access points in rural areas whereas urban areas with more providers willing to serve as access points do not have as great of a need for outreach workers in general.
Although annual trainings are required for organizations conducting assessments, BoS CoCs could develop standardized trainings for each type of job position contributing to the coordinated entry process. Ideas for creating annual trainings can be found in HUD’s Coordinated Entry Core Elements guidebook. Establishing standardized trainings for each type of job position can contribute to the development and maintenance of consistency across regions. One method of initiating trainings is through releasing an RFP for a vendor(s) to develop and present content via trainings to agencies involved in the coordinated entry process.

Travel across the state to meet with local communities for their buy-in to the process and assist them with initial implementation of the coordinated entry process. Providing on-site guidance during initial implementation, when major changes occur, or when issues arise, ensures consistency throughout the BoS.

Following written standards and policies and procedures that are compliant with government regulations and are agreed upon by the CoC is crucial to maintaining consistency in the coordinated entry process. Policies and procedures should be easy to read and accessible so that they are used as a guide regularly referenced by persons operating the coordinated entry process, rather than read once and then no longer used.

III.B.5 Identification and Maximization of Funding for Coordinated Entry

Identifying and maximizing funding for the coordinated entry process is key for a BoS CoC to operate effectively. However, funding sources that seem to successfully fund aspects of one coordinated entry process may not be able to fund another aspect, so CoCs will have to be aware of funder requirements.

**Challenge**

The coordinated entry process will not be functional if staff members are not funded to perform necessary roles, or operations may be more difficult without additional funding for activities such as funding for travelling to in-person meetings.

**Action**

BoS CoCs should explore the ability of multiple funding streams to fund aspects of the coordinated entry process. The Funding Source Chart – RRH.CA.PSH included in this Toolkit can assist with generating potential funding ideas. It includes a list of potential funders’ names, funding agencies, eligible programs, and notes about the funding.

A coordinated entry process utilizing HMIS could charge an HMIS participation fee in order to pay for some of the associated costs. Fees can be waived if they hinder participants’ ability to use HMIS or the coordinated entry process.

BoS CoCs should discuss how agencies with no or limited funding for participating in the coordinated entry process can still participate. For example, if an agency cannot cover the costs of completing assessments for prospective participants, it could instead connect them to agencies serving as access points.
Create scripts and flyers in multiple languages for agencies that are not access points yet still receive requests for homeless services or housing. Flyers can direct prospective participants to access points, raise awareness of the coordinated entry process, and clarify how agencies connect participants to the homeless crisis response system.

<table>
<thead>
<tr>
<th>Quality</th>
<th>Capacity</th>
<th>Performance</th>
<th>Resources</th>
</tr>
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</table>

CoCs can use data from the Active Lists demonstrating the need for housing to approach funders with financial asks to meet those needs.

Volunteers can help with a number of activities to help a staff member at capacity. This maximizes financial resources by using less funding on staffing so that more funding can be spent on other resources. Although they do not require a financial cost for their labor, it is important to consider how to engage volunteers so that they perform well and want to continue volunteering. Additionally, it is important to keep in mind there will be costs associated with training and managing volunteers.
IV. HMIS and Data

For an effective implementation of the Homeless Management Information System (HMIS), both the CoC and the designated HMIS Lead Agency has responsibility for oversight and management. The CoC is ultimately responsible for oversight of the HMIS, and designating a suitable, capable HMIS Lead Agency to carry out the day-to-day duties of operating the HMIS. The HMIS Lead is the eligible applicant designated by the CoC. The HMIS Lead is responsible for administering the HMIS and acting on behalf of the CoC, in accordance with the requirements of the CoC Program Interim Rule and any HMIS requirements prescribed by HUD. Administering the HMIS includes the day to day management of the system, reporting to the CoC, developing plans and policies, and training end users on how to use the system. Any additional responsibilities assigned to the HMIS Lead should be documented in the CoCs governance charter, but may also be clarified in a separate, more detailed written agreement that is incorporated by reference in the CoCs governance charter.

This section will identify challenges BoS CoCs may experience with HMIS implementation as well as list tools and resources HMIS Leads can access to continually increase the effectiveness of their HMIS. Topics covered in this section focus on HMIS operationalization, partner engagement, data collection and sharing, and data quality.

IV.A Operationalization of HMIS

A BoS CoCs need to identify challenges spanning the geographic region and action steps to address those challenges is a factor while operating HMIS. A new BoS CoC will need to restructure HMIS governance from a model of multiple CoCs and therefore multiple HMIS Lead Agencies to a model with one CoC with one HMIS Lead Agency. Numerous decisions are necessary for this task. Already formed BoS CoCs will still encounter the need to engage in multiple decision-making processes related to HMIS operations as they aim to improve the efficiency and effectiveness of their HMIS.

**Challenge**

It may be challenging for a BoS CoC to agree upon which agency should serve as the HMIS Lead Agency given the potentially high number of interested and able agencies. The BoS CoCs efforts can be particularly challenging if the HMIS implementation is shared across multiple CoCs since coordination then must occur not only within the BoS but also with those additional CoCs.

**Action**

Regularly monitoring HMIS Lead Agencies can assist BoS CoCs with determining which agencies should serve as HMIS Lead Agencies. By using a monitoring tool with agreed upon standards, a BoS CoC can use monitoring results as a basis for developing consensus on whether or not the current HMIS Lead Agency is effective enough to continue serving in the role.

There are multiple steps BoS CoCs will need to take to merge HMIS implementations. This Toolkit provides a checklist CoCs can use to begin taking those steps.
A statewide HMIS can be much more affordable for a BoS CoC than having each CoC
in the state operate independently since the CoCs can leverage their resources to
support the HMIS.

All BoS CoCs can benefit from regular evaluations of their HMIS software. Even if a
BoS CoC is currently satisfied with the software's abilities, it is possible that following
an evaluation BoS CoCs will find that another software can provide more features that
they are interested in or that another software can provide the same features at a
lower cost.

Challenge
BoS CoCs may be particularly interested in identifying sources of funding for HMIS since they need to
ensure funding is sufficient across the BoS.

Action
There are two potential actions for BoS CoCs to make regarding funding allocation
determinations. The first is how to utilize performance and data quality information
from the HMIS as a rating factor for housing and service projects in the Continuum.
The second action is to consider the importance and need for a fully functioning HMIS
for the CoC and the resources that are needed to support the HMIS implementation.
At times, the CoC may need to continue funding HMIS at appropriate levels for its
functioning and prioritize funding HMIS over other projects.

This Toolkit includes a list of potential funding sources for HMIS that BoS CoCs can
review to determine if there are additional funding streams they should pursue. BoS
CoCs should also consider all of the potential federal partners within their geographic
area and their ability to provide financial support to the HMIS implementation. This
typically looks like a fee structure (i.e., X dollar amount for each user license) that
projects and/or agencies receiving other federal funding that require the use of HMIS
may pay and/or all projects participating in HMIS may have to pay.

Challenge
BoS HMIS trainers may be restricted in how often they can train in-person and in general may
experience challenges with determining how to train their HMIS users as effectively as possible
regardless of any capacity constraints.

Action
BoS CoCs may benefit from a train-the-trainer approach for HMIS in order to increase
opportunities to train users in-person. If an HMIS trainers’ capacity to travel and train
in person is limited, teaching a group of willing HMIS users across the BoS on how to
train on at least a portion of the HMIS training curriculum could be a means to provide
more in person trainings than the CoC could otherwise hold. BoS CoCs could recruit
HMIS committee members to participate as trainers for an agreed upon length of time.

Centralizing trainings in one or several parts of a BoS is another way to increase the
number of HMIS users receiving in person trainings. Although not all HMIS users may
be able to attend, this method does account for HMIS trainers’ limited capacity to train in-person across the area. A BoS CoC can capitalize on trainees’ in-person attendance by offering the training one day of the trip and then facilitating a meeting on CoC business the next day.

Explore the possibility of offering virtual trainings, standing office hours and help desks, or improving them if they are already used by the BoS CoC. BoS CoCs can learn and incorporate best practices for virtual learning into trainings in order to better engage participants. Additionally, offering opportunities for live, virtual help desk sessions could connect users directly with HMIS Lead Agency staff so that users are able to ask questions specific to their agencies and so that HMIS Lead Agency staff members can streamline their process of responding to questions that previously may have been answered through more time-consuming methods such as e-mail exchanges or multiple phone calls throughout their work days. These strategies can eliminate costs stemming from on-site trainings, address capacity issues among HMIS Lead Agency staff members and HMIS users, and ultimately increase the number of trainings staff members are able to provide.

**Challenge**

One of the major functions of a CoC is to consider how to allocate resources. It can be challenging to determine how to address allocation across the system so that the BoS CoC as a whole remains effective and efficient in its work.

**Action**

HMIS Lead Agencies can increase their capacity by establishing a statewide HMIS committee structure. Committees can work on or support the HMIS Lead Agencies’ work on policy, funding, partner engagement, monitoring, and other topics identified by the CoCs. Offering committee seats to stakeholders across the BoS also ensures that regional perspectives are included in decisions impacting HMIS.

**IV.B Partner Engagement**

BoS CoCs’ approach to engaging partners in HMIS will likely differ depending on the funding sources of those partners. For instance, CoC and ESG Program-funded projects are required to participate in HMIS, which means one of their incentives to do so is to be compliant with program regulations. In turn, projects that are not required by their funding sources to participate in HMIS do not have the same incentive. However, regardless of projects’ funding sources, the BoS CoC may still experience difficulties with engaging certain projects for a variety of reasons. As a result, BoS CoCs will need to address any challenges they are experiencing with engaging partners with action steps influenced by the knowledge of what the specific barriers are to those partners’ engagement.
**Challenge**

Federal partners will have varying reasons for working with a BoS CoC to implement HMIS. As a result, BoS CoCs may encounter the challenge of identifying those reasons and then incentivizing partners to engage in the CoCs efforts.  

OR

States have varying levels of involvement in addressing homelessness and engagement with BoS CoCs. Regardless of differences across states, BoS CoCs should be considering strategies to enhance their engagement with the state and its housing and homelessness policies with the goal of collaborating on statewide HMIS implementation.  

OR

Part of BoS CoCs’ difficulties with engagement stem from the challenges they may experience with effectively expressing the importance of the CoC structure to mainstream service providers. This challenge is significant with projects that are not required by funders to participate in HMIS since it may not be prioritized by providers with limited capacity. However, if these agencies are unaware of the importance of participating and are disengaged, the CoCs’ performance may diminish and negatively impact the communities’ funding.

**Action**

- Create a list of federal and local funders that fund providers who serve persons experiencing homelessness and who are not required to use HMIS. For each of the federal or local funders, develop a list of incentives for why they should recommend or require these providers to participate in HMIS. Next, create a plan for contacting and persuading them of the incentives.

- Help providers and funders understand how participation in HMIS will improve access to services for their clients. As service providers understand how their clients benefit from HMIS participation they have a greater motivation to work with the CoC.

- Create a sample one-page document targeting various audiences, such as a state partner or a service provider, with points on why using HMIS is beneficial for them to use or support.

- Connect potential or current partners to CoCs in states with more developed HMIS to discuss their CoCs successes with its utilization. This can encourage potential or current partners to aim for similar outcomes.

- Strong leadership is crucial for the effectiveness of regional collaborative mobilization. The Idaho BoS CoC increased awareness of homelessness in the state through a targeted effort, which led potential partners to better understand the scope of homelessness in their communities. This occurred in the context of an entity’s strong leadership in the BoS and the subsequent support provided to regional collaborations.
Challenge
It can be challenging to incentivize service providers with recent funding losses to continue participating in HMIS at the same levels as before.

Action
Representative and transparent governance structures, including HMIS committees and work groups, offers opportunities for non-CoC or ESG-funded providers to engage and shape the operation of HMIS in the BoS CoC. A vision for HMIS developed by a variety of providers with numerous interests could attract additional, non-CoC or ESG-funded providers, to their efforts.

IV.C Data Collection
Similar to BoS CoCs’ approaches to engaging partners in HMIS, their approaches to collecting data will likely need to take into consideration not only the multiple funding sources influencing projects, but also specific challenges that may be impacting those projects. For instance, although CoC and ESG Program-funded projects need to meet HUD’s and their CoCs requirements with their data collection, individual HMIS users may not recognize the importance of collecting the data as long as participants receive assistance.

Challenge
HMIS users may not understand the importance of data collection and therefore may not be as willing to ensure they are entering complete data for each participant.

Action
Celebrate early successes to demonstrate to partners why their participation is important. Identify agencies that recently did well at something HMIS related and share their success with the CoC.

Challenge
Providers that do not receive HMIS funding may not be as willing to devote unpaid time to HMIS data collection.

Action
Increase HMIS bed coverage through education and incentives for non-funded providers. For example, creating an agreement with a faith-based provider to provide a staff person to meet regularly with clients as part of coordinated entry to collect and enter data. Or consider “purchasing” a non-funded provider’s data by providing a stipend to cover costs of data collection efforts. With limited funds, it may be necessary for the CoC to prioritize those incentives for those partners who provide the most units and serve the most people experiencing homelessness.
IV. HMIS and Data | Balance of State Continuum of Care Toolkit

IV.D Data Sharing
Sharing data across BoS CoCs can be facilitated by their HMIS implementations. For instance, depending on how their HMIS implementations are established, these CoCs have the potential to use HMIS to receive participant information and documentation from a participant who entered the system across the geographic area. Essentially, BoS CoCs will need to determine what data should be shared among BoS CoC HMIS users and then develop and maintain processes for sharing it.

Challenge
Hearing anecdotal information about homelessness within communities may occur if data is not shared among all stakeholders, which is then a challenge for CoCs since anecdotal information is insufficient for understanding resource needs.

Action
HMIS users may not have the ability to use the data, potentially due to inexperience or limited access to creating reports. BoS CoCs may want to consider developing trainings on how agencies can use data or increasing users’ access to these abilities. Analyzing current data can develop users’ understanding of how their homeless crisis response system operates and allows them to access this information whenever they need it, rather than relying on others in the system to produce reports.

An HMIS implementation allowing users to share data throughout the BoS CoC increases the levels of data accessible to the CoC. If CoCs decide to utilize this approach to data sharing, they should ensure their privacy policies and release of information clearly cover the new approach.

IV.E Data Quality
Maintaining HMIS data quality is a challenge that needs to be addressed not only by an HMIS Lead but also by the entire CoC. This is because having good data quality creates numerous benefits for CoCs, such as a better understanding of gaps in resources or which projects may need technical assistance to improve placements into permanent housing. It is also a challenge that CoCs can create plans to address through establishing CoC-wide goals and on-going evaluations of projects participating in HMIS. BoS CoCs can use information from this section to influence their data quality plans and ultimately work toward improving the quality of their HMIS data and their ability to serve persons experiencing homelessness.

Challenge
Non-CoC or ESG Program-funded homeless service and housing providers may cover areas of a BoS CoC that HUD-funded projects do not. This can be a challenge for the BoS CoC if non-HUD funded providers do not want to use HMIS or have poor data quality since they do not have a requirement to use HMIS or improve HMIS data quality.
**Action**

Showing HMIS users the reports resulting from their data collection and explaining how the data is used can demonstrate to users that their work is important and ultimately motivate them to strive for higher quality data.

Make data a consistent part of every CoC meeting. A data topic/presentation should be on every agenda for the CoC and CoC Board meetings.

Consistently review System Performance Reports. One idea is if the CoC meets monthly, each month the HMIS Lead and/or Data working group can present on one of the System Performance Measures; explain what the measure is, the data that is used to calculate the measure, the performance for each of the past few reporting years, and a discussion on how to improve the performance on that measure across the system. By the end of the year, the CoC would have had two separate meetings focused on each of the six system performance measures.

**Challenge**

Service and housing providers may not trust the accuracy of HMIS data if it does not represent the results they thought it would.

**Action**

Providers with more than one HMIS user will have an increased capacity for data collection, which can lead to more timely data entry and ultimately increased accuracy.

Set up a time to meet in person or remotely with each provider about their performance. For providers that express that the data is not reflective of their performance, ask them to explain and help them walk through potential data quality issues that are likely impacting the accuracy of the data.

Use data to inform the review and rank process, coordinated entry, and system planning. Data should be a cornerstone of many decisions made by the CoC. The CoC should understand the data in HMIS and utilize the data in its decision-making.

The HMIS data quality plan should include indicators and targets and a process for monitoring compliance and enforcing incentives and consequences.

Explaining the connection between data collection, entry, and quality can facilitate the process of developing trust in the accuracy of quality data.

Establish data standard expectations and benchmarks. This can be done through a working group of the CoC in coordination with the HMIS Lead, and should be reviewed by the CoC and CoC Board on a regular basis.

Build HMIS compliance into enforceable agreements or contracts. The CoC can establish requirements through MOUs with CoC funded projects that outline the HMIS participation requirements including benchmarks for data quality, reporting, etc.
Challenge

Although HMIS users receive training, there will be times when users are confused about steps they need to take in HMIS or forget aspects of the implementation that they previously learned.

Action

Identify aspects of HMIS that regularly create the most data quality issues for the BoS CoC. Next, create a script for and a recording of a 2-3 minute training for each of these aspects. The recordings could be posted online or e-mailed to HMIS users with the intent of offering them to new HMIS users and of requesting users struggling with these aspects of HMIS to review them.

Create and implement a cultivation strategy for local champions with the goal of succession planning so that data quality is not negatively impacted when HMIS users transition out of their HMIS roles.

Analyzing Data

The SNAPS Data Strategy and Usability sets forth a vision for communities to strategically plan for optimized systems of care using data on population needs and system performance to inform ongoing improvements. The following ideas will assist a Balance of State to analyze their system-level data and to break it down within regions.

- In October 2018, the Longitudinal Statistical Analysis (LSA) will be released. The LSA can filter data by geocode. To prepare for its release, ensure that projects are set up correctly in HMIS with geocodes so you can use the geocode filter to analyze demographics, project outputs and outcomes, and the impact that each region has on system-level performance.
- System Performance Measure reports, although not currently set up to filter data at a regional level, can be modified either by your HMIS System Administrator and/or HMIS Software Vendor.
- Data from coordinated entry can be used to coordinate housing and services to individuals and families AND can be analyzed to identify system-level barriers to housing and services. Analyze your data to see if there are patterns in the sub-populations of people experiencing homelessness and if sub-populations are accessing housing and services at the same rate as other sub-populations.
SECTION V
RECIPIENT AND PROJECT ENGAGEMENT
V. Recipient and Project Engagement

As a part of ensuring the homeless crisis response system is operating at optimum performance, BoS CoCs need to work closely with agencies receiving homeless housing and services funding within their geographic area. BoS CoCs should create regular processes and practices for working with the recipients of HUD and other funding sources, such as building capacity of potential/new providers, ensuring compliance of funded agencies, and enhancing the operations and performance of projects.

V.A Potential Applicant Identification and Capacity Building

To increase capacity, BoS Collaborative Applicants and CoCs may take the opportunity to find new providers to bring into their homeless crisis response system. Building the capacity of potential applicants before the submission of project applications is often a difficult undertaking but it can pay off during an open competition process. However, CoCs should ensure that all potential applicants are treated fairly and given the same opportunities as any other potential applicant to avoid any perceived or real conflicts of interest.

Challenge

In some BoS CoCs there may be a limited pool of potential providers. Applying for a homeless assistance project may mean changing the mission, target population, or scope of an agency. Or in some cases, there may not be any additional providers that are willing to take federal funds and comply with federal requirements.

OR

Potential applicants may not consider applying for funding due to potentially small amounts available for homeless assistance projects. Also the match requirements for CoC and ESG-funding may cause challenges for new projects.

Action

- Separate the financial side from the services side of a project by creating a fiduciary agent to handle the grant administration, rent payments, and finances while letting the local ‘agencies’ provide the services. The fiduciary agent can be located within any part of the BoS CoC and does not have to sit in the same geographic area of the local service provider.

- Partner with non-traditional service providers funded through other means; and let the HUD money (ESG or CoC) provide the financial assistance. Examples include: Behavioral Health Care providers for substance abuse and mental health services, Federally Qualified Health Centers, Community Action Agencies to provide a level of information and referrals, case management, etc.
**Challenge**

The application process, especially for CoC Program funded projects, can seem daunting if an agency has never completed the CoC process before. Learning a new grants system may be challenging for some providers who have not previously used the electronic grants management system of HUD’s Office of Special Needs Assistance Programs, also known as e-snaps.

**Action**

- **Provide leadership development at the system, local community, and provider level** — this can be done by the CoC Lead or outsourced to a leadership coach within the community.

- **In a BoS CoC with lots of regions, divide them up among CoC staff so that the regions have the opportunity to receive more direct one-on-one support, and one CoC staff member is not overwhelmed with work. The BoS CoC could also hire staff that work ‘remotely’ compared to the BoS CoC headquarters and are stationed locally within the regions to provide more in-person interaction.**

- **Hold Project Design Clinics both before application for funding and after funding has been awarded, and pair this with grantee administration/funding requirements training.**

**Challenge**

Building the capacity of providers within certain geographic areas may mean that a BoS CoC needs to create and support community leaders. This process takes time and commitment from the BoS CoC and new community leaders.

**Action**

- **Partner with City/County authorities to implement requirements for operating homeless services within their jurisdictional/geographic areas. For example, the City or County may be able to attach requirements to obtaining a business license, such as entering data into HMIS, participating in the CoC, operating your project using Housing First, etc.**

- **In some BoS CoCs with more rural areas, private funders tend to be individuals instead of foundations. The CoC can implement their own private funders’ campaign around CoC principles to educate the philanthropic/individual donor base — not asking for money, but as an education tool.**

**V.B Compliance Support for Funded Projects**

One role of a CoC is to ensure that all funded projects within their geography are in compliance with their funding requirements. CoCs tend to focus mostly on those projects receiving HUD (CoC and ESG) funding, though their standards and requirements may be helpful for bringing all providers in the area to best practices. Since this is also a major role of the local HUD field offices, supporting the compliance of funded projects requires a partnership with the local HUD field offices.
**Challenge**

Once a project is funded and begins to focus on implementation, it may be more difficult for them to prioritize learning all of the funding requirements. In some instances, the project operating staff has not read or seen the Notice of Funding Availability (NOFA), project application, or the actual Contract with the funding requirements.

**Action**

CoC Start-Up Materials and Financial Management trainings on the HUD Exchange should be required trainings before project application submission and during start-up/operations. All staff involved with the project should be required to participate or review the training materials.

Providers should utilize the HUD Exchange on their own, searching the FAQs before asking the BoS CoC. The BoS CoC could create a list of standard questions/answers from the local HUD field office(s). Projects should also know and utilize the ‘Ask A Question’ (AAQ) feature of the HUD Exchange, and make sure to share the responses with the BoS CoC Collaborative Applicant.

**Challenge**

With all of the work that it takes to operate a project, providers may have difficulty prioritizing education on and implementation of best practices. It may take a cultural change for the provider to implement best practice approaches, especially for providers that have been operating for a long time.

**Action**

Create standardized operations materials for your BoS CoC that are compliant with all funding requirements so the agency only has to make modifications for their specific project. This could include: client files, policies and procedures, subrecipient agreements, documentation of homeless/chronic homeless status, match letters, etc. This will assist BoS CoCs in ensuring compliance and the local HUD field office(s) when monitoring.

The BoS could create or partner with other organizations to provide training options for all project, from front-line workers to directors and board members. Ask the local HUD field office to review and sign-off on standardized materials to ensure that it meets monitoring expectations.

**Challenge**

Sometimes, project Policies and Procedures may not match their Project Application, such as ‘checking the box’ for being a Housing First project, but in practice not operating using the Housing First approach. This may be because the staff operating a project may not be the same staff that are writing and submitting the funding application.
V.C Operations Support for Funded Projects

The CoCs role in supporting funded projects with operations is to ensure that each project is capable of producing the outcomes the homeless crisis response system needs. It is imperative that an entity takes on this supportive responsibility.

**Challenge**
Some agencies within the BoS CoC may operate multiple projects from the same funding source which requires multiple reports, invoices, monitoring visits, etc.

**Action**
Consolidating Grants may be a great opportunity for a provider to better operate funded projects. Grant Consolidation is when a recipient operates two or more grants of the same program component (e.g., two PSH projects) that serve the same population and they want to combine the grants into one grant that serves the same number of participants for the same amount of money as when the grants were separated. Providers must work directly with their local HUD field office and CoC to consolidate grants, and local HUD field offices have a written process for how and when this should happen. The 2017 NOFA made this easier to do when projects are ‘expanding’ instead of creating new projects. BoS CoCs should talk with the recipient about the administrative burden of having one grant instead of multiple grants. One
consolidation challenge for which projects should plan for centers on the different operating start dates of a project, because the consolidated grant normally takes the earliest operating start date, potentially leaving a funding gap.

**Challenge**

Agencies operate within their own local geography across the CoC – and therefore need to work with multiple non-homeless stakeholders, such as school districts, child welfare, behavioral health providers, etc. The BoS CoC may have difficulty knowing who each of those local stakeholders are and relying on the local agencies or local planning bodies to coordinate the work.

**Action**

Help providers across different service sectors realize how participation in the CoC is a benefit to them and the people they serve. CoCs that can help other service providers make this connection often find a very willing partner who sees this effort as mutually beneficial and worth the time investment to coordinate.

Ask providers to describe their work with these individual non-homeless sector providers, and try to find continuity across the CoC geography and connection to the CoC work at the system level.

**Challenge**

For a variety of reasons, a project may discontinue services or stop receiving funding to operate. This can cause multiple challenges for the BoS CoC and persons experiencing homelessness in that geographic area including, but not limited to, running out of projects of that type, ramping down a project, deciding whether to continue to allocate resources in that geographic area or to make that funding competitive across the entire BoS, etc.

**Action**

Create project ramp down materials (or revise existing materials) and work with projects as they are ramping down to ensure there is a seamless service delivery to project participants.

Build capacity of potential new providers in a geographic area by facilitating Project Design Clinics before the application process.

Add language about the CoCs value in serving its geographic location as a part of the CoCs funding allocation policy. In some communities implementing this will mean trying to keep resources in areas with higher populations of people experiencing homelessness, and in other communities, this means ensuring that there is a transparent and open competition across the entire geography and the highest scored project receives funding, regardless of geographic location.
V.D Project Performance Improvement

A major role of every CoC is to ensure that funded projects are high-performing and effective in order for the system to perform at its optimal level. All projects have areas for improvement. The CoC should evaluate and monitor the performance of all projects and identify, with the project, areas for improvement. In some CoCs, the Collaborative Applicant may only be able to provide local technical assistance to those projects that are the lowest performing. Therefore, it is important to establish mechanisms and activities for projects to improve their performance without assistance.

Challenge

Some BoS CoCs have few options for project recipients in their geographic area and therefore fund low performing projects just to have a resource available.

Action

- BoS CoCs should consider their approach to funding across the entire geography. Add language about how the CoC values serving its geographic location as a part of the CoCs funding allocation policy. (This action also helps with Operations Support for Funded Projects)
- Work with a project to see if they can separate the ‘finance’ and ‘service’ components to help divide the work and allow providers to focus on their area of expertise. (This action also helps with Finding and building capacity of projects)

Challenge

One way to improve performance is to ensure that staff has the necessary skills and knowledge to operate the project. Training of front-line staff can be expensive, especially when staff is spread out across a large geographic area.

Action

- Dive in deep to figure out what aspect of a project is lowering their performance, and work directly with the provider on building their capacity in that area. Remember you can’t fix everything at the same time; work with the provider to prioritize areas the CoC can help with, and what the provider can work on themselves.

Challenge

In communities where it may take hours to travel between locations, staff may spend more time traveling than serving participants, especially when projects are smaller in size due to relative need in the area. It is challenging to assess the cost effectiveness of these projects compared to projects that operate in a smaller geography.
**Action**

Help providers think creatively about serving a large geography, such as use of the medical tele-health model to provide services, providing some ‘desk’ case management and sprinkle in face-to-face services, or use of local social service agencies/mainstream resources to provide the face-to-face services while the homeless service provider focuses on the housing-related services remotely.

**Challenge**

When projects are spread out across a large geography, it is easier for them to think of themselves as a ‘lone’ project, rather than as part of a broader system of housing and services all focused on the same goal of preventing and ending homelessness. It is harder for them to see their project’s performance as being impacted by other projects that are hundreds of miles away.

**Action**

A BoS is a system, even if spread out across a large geography, since it is a group of interacting, interrelated, and interdependent components that form a complex and unified whole. Part of the BoS CoCs role is to help everyone in the homeless crisis response system see that they are a part of the complex and unified whole and that their actions impact the actions of all the other parts of the system. Systems only work if all of the individual components are working optimally. For instance, a lack of willingness to serve persons experiencing chronic homelessness might mean that as a system, the unsheltered numbers are increasing and those who are unsheltered have longer experiences of homelessness, increasing the trauma and vulnerability of that population.

**Challenge**

Covering a large geographic area with the correct mix of housing interventions can take many resources as well as providers who are willing to serve outside their county or region.

**Action**

Using mapping software, map the geographic coverage of your existing projects in a way that shows the geographic coverage of different project types (i.e., use one color for Rapid Rehousing projects and another for Permanent Supportive Housing projects). If you have areas of the BoS CoC that are not covered by existing projects, encourage project recipients to include more GeoCodes in their Project Applications than just their immediate area/county.

If you don’t have enough of one project type within specific areas of your BoS CoC, prioritize those areas during your next Competition.
RESOURCES
VI. Resources

GOVERNANCE & STRUCTURE

HUD Guidance:
- CoC Program Interim Rule
- Establishing and Operating a CoC
- CoC Governance charter podcast
- Rural CoC Guidebook
- CoC 101
- CoC-2.0 training materials
- System Performance Measures
- Project Rating and Ranking Tool
- 2016 CoC competition debrief slides
- CPD Monitoring Handbook – Chapter 29
- CoC Program Grants Administration User Guide
- CoC Program Frequently Asked Questions
- CoC Wellness Checklist w-Regs-05-06-16

National Partner Resources:
- CoC Governance and Structure TA Guidance
- Structuring CoC_Beyond Compliance_DesigEnt_FINAL
- De-identified Governance Charter Sample-TAC-102015
- CoC Governance and Structure Checklist_v2_Unprotected
- CoC committees_workgroups_FINAL
- CoC Project and System level Monitoring Tips_v2
- Checklist for an Effective Continuum of Care_FINAL

Community Examples:
- Wisconsin BOS
  - Community Example-wi_bos_governance_charter_revised_2.28.17
  - WI BOS CoC territory map
  - Program Standards
- Virginia BOS
  - Community Example-VA- Balance of State Charter
  - VA BOS CoC regional map
  - Virginia Housing Alliance embeds AmeriCorps VISTA
  - Solutions for BOS CoCs- NAEH 2016 conference Slides

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- **Policies, Documents, and Forms**
  - Michigan BoS CoC
    - Community Example- CoC coordinator toolkit-Evaluating Outcomes
    - Community Example- CoC coordinator toolkit-Continuums of Care – Organizing Basics
    - Community Example- CoC coordinator toolkit-CQI Basics
    - Community Example- CoC coordinator toolkit-HMIS Glossary
    - Community Example- CoC coordinator toolkit-Homeless Definition Crosswalk
    - Community Example- MI BOS COC Monitoring Tool
    - Community Example- MI State_Funding_Sources_2011
  - Indiana BOS CoC
    - Indiana BOS regional map
    - Project Ranking and Reallocation Policy
  - Ohio BOS CoC
    - Committees and work groups
    - Performance Management plan
    - Program Standards
  - North Carolina BOS CoC
    - Responsibilities and committee structure
    - Policies and Standards
  - Connecticut BOS CoC
    - Grantee Monitoring Tool and Guide
    - Policies and Procedures
  - Iowa BOS CoC
    - Community Example-Iowa BOS Governance Presentation
  - Wyoming
    - Statewide CoC charter
    - Community Example-ROCC-Board-Roster-Approved-by-Unanimous-Board-Vote
  - Delaware CoC
    - De CoC HPC MOU Coll App CI Board
  - Chicago CoC
    - Collaborative Applicant – Chicago MOU
  - West Virginia BOS CoC
    - Governance Structure
  - AK Anchorage
    - Dashboard
  - Georgia BoS CoC
    - Georgiaboscoc-coc-membershipmeetingpresentationmarch2015 p. 48-50
  - Vermont BOS CoC
    - Reallocating COC Projects Policy
• Arizona BOS CoC  
  o  [Reallocation/Bonus Application](#)  
• Wyoming CoC  
  o  [Monitoring Form](#)  
• Washington DC  
  o  [Community Example – Project Report Card-TCP- DC](#)  
• Texas BoS CoC  
  o  [TX BOS-THN_CoCPandPs_2016.09.12-FINAL](#)  

**Tools:**

• [List of U.S. BOS CoCs](#)  
• [RBF All in One Agenda](#)  
• [CoC Governance and Structure Checklist_v2 Unprotected](#)  
• [Elements of a Governance Charter: What Should Be Included in Your CoC Charter](#)  
• [Tool- BoS CoC Sample meeting agenda format](#)  
• [Council of Nonprofits Resources for Board member orientation and support](#)  
• Find software, fundraising resources and coaching support for Non-profits at [Network for Good](#).  
• Low cost technology resources  
  o  [Google Hangout](#)  
  o  [Uberconference](#)  
  o  [Join me](#)  
  o  [Totally Free Conference calls](#)  
• [Strategies to End Homelessness: COC Monitoring Tool](#)  

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IMPLEMENTING A SYSTEMS APPROACH

HUD Guidance:
- Guide to Coordination and Collaboration for CoCs and Consolidated Plan Jurisdictions
- Resources for CoC and PHA Collaboration to End Homelessness
- HUD’s System Performance Measures
- CoC Duties: Planning and System Operation Responsibilities Broadcast
- PIT Count Methodology Guide
- Housing First in Permanent Supportive Housing Brief
- CoC Competition Focus: Housing First
- Resources for CoC and PHA Collaboration to End Homelessness
- Opening Doors Through Multifamily Housing: Toolkit for Implementing a Homeless Preference
- HUD CoC Merger Guide
- Housing Search Assistance Toolkit
- Housing First Assessment Tool

National Partner Resources:
- Using the 2017 CoC Competition to Strengthen Connections to Housing For Survivors of Domestic Violence
- Effective Leadership in Network Collaboration: Lessons Learned from Continuum of Care Homeless Programs
- Using Homelessness and Housing Needs Data to Tailor and Drive Local Solutions, USICH
- Housing First Fact Sheet, NAEH
- Housing First Toolkit_Resource Guide_FINAL
- Housing First Checklist, USICH
- LIHEAP [Low Income Housing Emergency Assistance Program]
- WAP [Weatherization Assistance Program]
- Rural Transit Assistance Program
- Rides to Wellness Community Scan Project, Health Outreach Partners
- Center for Faith-Based and Neighborhood Partnerships: Homelessness Resources Flyer
- The Role of Outreach and Engagement in Ending Homelessness
- Case Study: Ending Homelessness for People Living in Encampments
- Partnering with Hospitals to End Homelessness
- July 2017 Region 5 CoC Merger Presentation

Community Examples:
- Wisconsin Balance of State System Performance Measures Dashboard
- Landlord Engagement Efforts:

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- VHDA and Virginia Housing Search
- Washtenaw County
- Nashville
- Santa Barbara
- King County
- West Virginia Balance of State – Partnership with PATH
- Pathways Vermont Housing First and Telehealth

**Tools:**
- **BOS Toolkit – Tips for Effective Meetings**
- **RBF All in One Agenda**
- **Digital Tools Comparison_DRAFT**
- **Who Should Be Involved in the CoC_v2**
- **Key Questions to Solicit Input from Key Stakeholders_DRAFT**
- **BOS Toolkit – Successful Onboarding Template_DRAFT 10-10**
- **HUD GIS Toolkit How-To**
- **Zillow Rental Housing Search** [Search rentals by income restricted/Community Pillar landlords]
- **National Low Income Housing Coalition Preservation Database** [Allows registered users to search for federally assisted rental properties]
- **Center for Advancement of Critical Time Intervention**
- **Best Practices for Rural Street Outreach:** Tennessee Valley Coalition for the Homeless
- **CoC Merge Checklist**

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COORDINATED ENTRY

HUD Guidance:
- Coordinated Entry Policy Brief
- Coordinated Entry Core Elements
- Verifying and Documenting CH and LOT Homeless
- Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in PSH

National Partner Resources:
- Enlisting Mainstream Resources and Programs to End Homelessness
- National Partner Recommendations – PHA Guide to CES
- National Partner Recommendations – Health Centers and CES
- Coordinated Entry Processes: Building Mutual Engagement Between Schools and Continuums of Care
- National Partner Recommendation – Consensus Decision Making Process incl Modified Consensus

Community Examples:
- Community Example – 100 Day Challenge Facilitator Agenda
- Community Example – 100 Day Challenge Agenda
- Community Examples – 1000 Day Challenge Workplan
- Sample Project Intake Policy
- CoC Homelessness Verification Form
- CH Elig Verification Forms Checklist
- Sample Third-Party Letters
- CT BoS CoC – Disability Documentation Form
- CT BoS Sample Eligibility Tools Compiled
- Length of Time/Definition Homeless
- Community Example – Chronic Disability Documentation
- Community Example – PHA and CES
  - Intake Specialist with Coordinated Entry System
  - Coordinated Entry Assistant Manager Job Description
  - Community Example – 2-1-1 CES Specialist Job Description
  - Community Example – CES Program Director Job Description
  - Community Example – Assessment-and-Diversion-Specialist Job Description
- Request for Proposals for Coordinated Entry Network Administrators and Services for the Missouri BoS CoC Identified Pilot regions
- Community Example – Vermont CE Partnership Model

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• Requests for Proposal for Training and Technical Assistance on Coordinated Entry and Diversion Methods to 10 Regions in the Missouri Balance of State Continuum of Care
• Coordinated Entry Customer Survey
• Requests for Proposal for Training and Technical Assistance on Coordinated Entry and Diversion Methods to 10 Regions in the Missouri Balance of State Continuum of Care
• Example Grievance for participants
• Example grievance for members
• Community Example – Assessor and CoC MOU
• Community Example – Advertisement_Script
• Community Example – Advertisement_Script_Spanish
• Lessons Learned from Developing Coordinated Entry Systems: Richmond and Los Angeles

Tools:
• Abilities of Prioritization - PowerPoint
• RBF All in One Agenda
• Tool – Funding Source Chart – RRH.CA.PSH

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HMIS

HUD Guidance:
- HMIS Requirements
- HMIS Proposed Rule
- Federal Partner Participation
- The Business Case for Partnering with Public Housing Agencies to Serve People Who Are Homeless
- CoC and PHA Collaboration: Strategies for CoCs to Start the Partnership Conversation
- HMIS Data and Technical Standards
- 2004 HMIS Data and Technical Standards Final Notice
- CoC Data Quality Brief
- HMIS Data Quality Monitoring Toolkit

National Partner Resources:
- Veterans Administration Privacy Guidance on Authority to Make Disclosures to Community Partners
- 6 e-learning best practices
- Enlisting Mainstream Resources and Programs to End Homelessness

Community Examples:
- Community Example – NC HMIS monitoring tool
- CoC and ED Collaboration Case Study: CoC and School System Share HMIS Data in Waco, Texas
- Knoxville Community Dashboard on Homelessness
- Austin's Community Dashboard
- Community Example – DE HMIS Lead Agency MOU
- Community Example – NYC HMIS MOU
- CT HMIS Client Consent Form: Release of Information (Sample)
- Community Example – HMIS Project Monitoring Tool

Tools:
- Tool – Funding Source Chart – HMIS
- HMIS Job Description: Project Manager
- HMIS Job Description: System Administrator
- Tool – Merging HMIS
- Tool – HMIS Lead Agency Transition Checklist
- Worksheet for HMIS Software Capacity Evaluation
- Tool – Plans for Incentivizing
- CoC HMIS Data Collection Templates
- HMIS Data Quality Template

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WORKING WITH RECIPIENTS AND PROJECTS

HUD Guidance:
- Coll App FO Roles and Responsibilities
- CoC Wellness Checklist w-Regs-05-06-16
- System Performance Improvement Briefs
- Ask A Question
- CPD Monitoring Handbook – Chapter 29
- CoC Program Grants Administration Guide
- CoC Program Toolkit – CoC Responsibilities and Duties – CoC System Operations and Planning
- Key Considerations for CoCs in Changing Recipients
- CPD Risk Analyses for Monitoring
- Financial Management Curriculum
- CoC Program Start Up Trainings – 2013 Materials

National Partner Resources:
- Enlisting Mainstream Resources and Programs to End Homelessness

Community Examples:
- Texarkana Sub-Recipient Agreement
- Echo/Austin Policies and Procedures for operating PSH
- Texarkana Policies and Procedures for operating RRH
- Texas BoS RRH Project Design Plan
- Texas BoS Project Design Clinic Agenda

Tools:
- Ramping Down De-Funded Housing Project Planning Guide – Jan 2017

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