



# **CoC Duties: Planning and System Operations Responsibilities**



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 1

Welcome to the HUD Broadcast on the Continuum of Care Duties: Planning and System Operations Responsibilities.

# Today's Broadcast will cover...

- Continuum of Care Program Purpose
- CoC Planning Responsibilities
- CoC System Operations Responsibilities



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 2

We will start today's broadcast with an overview of the purpose of the CoC Program. Then we will walk through the planning and systems operation responsibilities assigned to the CoC in the relevant regulations, so viewers can clearly understand what will be expected of their CoCs.

# Purpose of CoC Program

- Promote a communitywide commitment to the goal of ending homelessness
- Provide funding for efforts to quickly rehouse individuals and families who are homeless
- Promote access to and effective use of mainstream programs by individuals and families who are homeless
- Optimize self-sufficiency among individuals and families experiencing homelessness



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 3

Let's start with an overview of the purpose of the CoC Program. The CoC Program is designed to:

- Promote a community-wide commitment to the goal of ending homelessness;
- Provide funding for efforts to quickly re-house individuals and families who are homeless which minimizes the trauma and dislocation caused by homelessness;
- Promote access to and effective use of mainstream programs;
- Optimize self-sufficiency among individuals and families experiencing homelessness.

The planning and system operations responsibilities assigned to the CoC recognize the extent of coordination required to achieve the purpose of the CoC Program, and the need to have a clear lead entity accountable for these goals.

## Planning Responsibilities

Minimally, the system should encompass:

- Outreach, engagement, and assessment
- Shelter, housing, and supportive services
- Homelessness prevention strategies

**The CoC is responsible for coordinating the implementation of a housing and service system that meets the needs of persons who are homeless throughout its geography.**



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 4

Under the CoC Program, CoCs have four specific planning responsibilities. The first of these is the development of a plan for a coordinated housing and service system that meets the needs of individuals, unaccompanied youth, and families experiencing homelessness.

At a minimum, the system should encompass:

- Outreach
- Engagement
- Assessment
- Shelter
- Housing
- Supportive services, and
- Prevention strategies

## Planning Responsibilities

---

- Plan and conduct point-in-time count
  - Sheltered and unsheltered
  - Conduct annual gaps analysis of homeless needs and services
- Participate in Consolidated Plans
- Consult with Emergency Solutions Grant (ESG) recipients
  - Plan for allocation of ESG Funds
  - Reporting on and evaluating performance of ESG recipients/subrecipients
  - Coordinated Assessment and Written Standards



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 5

The second CoC responsibility is planning and conducting a point-in-time count of unsheltered and sheltered persons who are homeless that meets all requirements established by HUD. The CoC is also responsible for conducting an annual gaps analysis of the homeless needs and services available in the Continuum.

Another CoC planning responsibility includes working with the Emergency Solution Grant recipients and Consolidated Plan jurisdictions within its geographic boundaries. The CoC also provides information to inform the Consolidated Plans, develops a plan for allocating ESG Program funds, and reports on and evaluates the performance of ESG Program recipients and subrecipients.



# System Operations Responsibilities

- Establish performance targets, monitor performance, evaluate outcomes, and take action against poor performers
- Evaluate ESG and CoC project outcomes and report to HUD
- Establish and operate a centralized or coordinated assessment system
- Establish written standards for providing assistance



U.S. Department of Housing and Urban Development

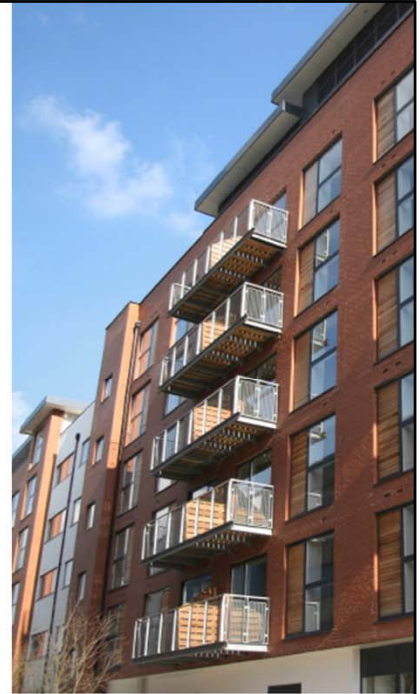
CoC2.0 | Slide 6

In addition to the planning responsibilities described above, the CoC Program interim rule assigns four responsibilities to the CoC associated with operating the CoC's homeless system. Combined, these responsibilities provide a mechanism to ensure the CoC's plans are effectively translated into practice.

In the past, many of these responsibilities were implicit through the annual application process, but some of them are new. For example, the requirement to establish and operate a coordinated assessment system and to establish and consistently follow written standards for providing CoC assistance will probably be new to most, if not all, CoCs. Let's talk about each of these requirements in more depth.

## Evaluate Performance

- Establish performance targets
  - In consultation with recipients/subrecipients
  - Targets must be appropriate for the population and program type
- Monitor recipient/subrecipient performance
- Evaluate outcomes and report to HUD
  - For both CoC and ESG program-funded projects
- Take action against poor performers



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 7

Under the CoC Program interim rule, CoCs are required to have more accountability for the performance of the recipients and subrecipients.

First, in consultation with recipients and subrecipients, the CoC is responsible for establishing performance targets, appropriate for population and program type.

The CoC is then responsible for monitoring recipient and subrecipient performance, evaluating outcomes, and taking action against poor performers.

Note that “taking action” does not have to mean taking a punitive action. The CoC could provide poor performers with technical assistance and require improvement plans as a means to strengthen the overall system rather than let poor performance continue unchecked.

# Performance Measures

The HEARTH Act establishes clear system performance measures

- Length of time homeless
- Subsequent return to homelessness
- Access/coverage (thoroughness in reaching persons who are homeless)
- Overall reduction in number of persons who experience homelessness
- Job and income growth for persons who are homeless
- Reduction in first time homelessness
- Other accomplishments related to reducing homelessness



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 8

The performance measurement responsibility is instrumental to inform system planning and to benchmark whether the CoC's resources and services are being coordinated in a way that moves the CoC toward its goals for ending and preventing homelessness and that the CoC is accountable for its funding decisions.

The HEARTH Act establishes clear system performance measures that the CoC should use and will need to report to HUD.



## Evaluate outcomes of CoC and ESG Program recipients

- Requirement is for project-level targets
- Encouraged to set system targets and regularly measure performance
- Consider how project-level performance contributes to system-level performance when taking action against poor performers

**The CoC has responsibility for measuring performance at the system level and project level**



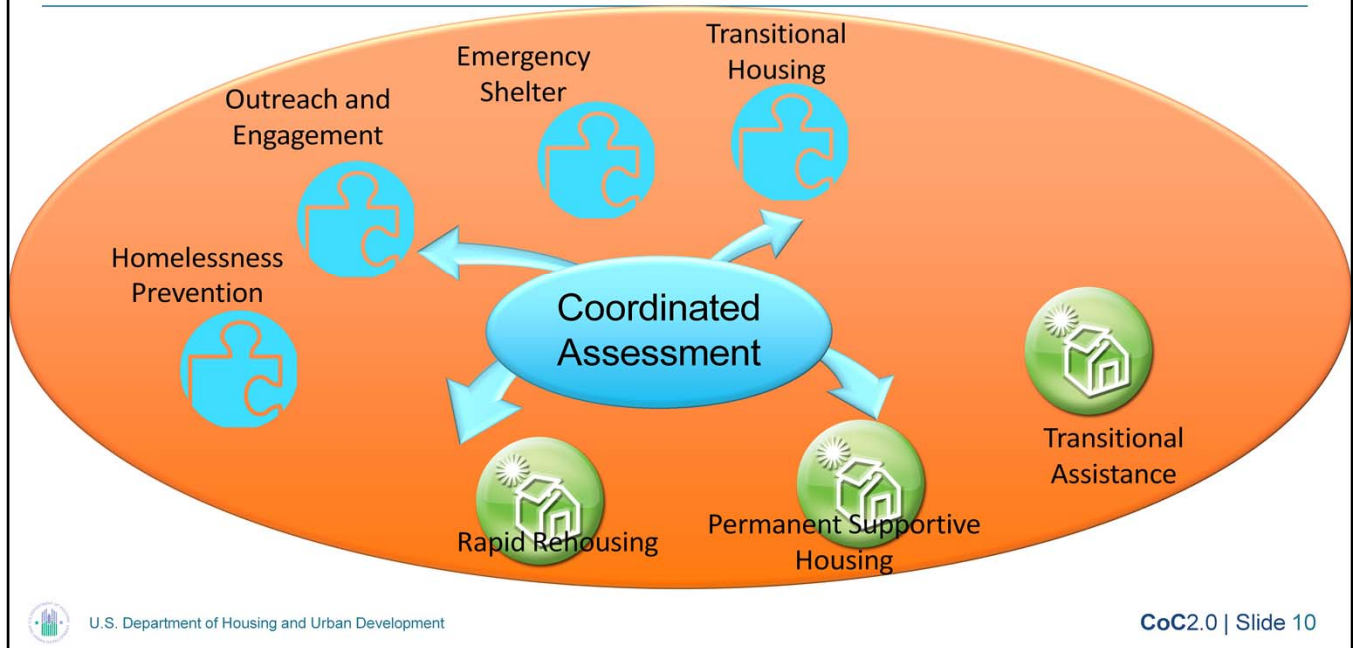
U.S. Department of Housing and Urban Development

CoC2.0 | Slide 9

The CoC has the responsibility of measuring performance at the system level *and* the project level, including outcomes of projects funded under both the CoC and the ESG programs.

This requirement is in place to take action against poor performers, but the CoC will report to HUD on all of them.

## Centralized/Coordinated Assessment



The last two operational responsibilities of the CoC center around coordinating the housing and services available in the geographic area of the Continuum. This will be a substantial new requirement for many CoCs, especially since it requires collaboration with the ESG recipients in the CoC's geographic area.

First, the CoC must collaborate with the recipient of ESG funds to establish and operate a centralized or coordinated assessment system. The purpose is to have a standard approach to comprehensively assess the housing and service needs of individuals and families when they initially seek help.

The coordinated assessment, with the system-wide performance targets, is necessary in order to meet the Federal Strategic Plan goals.

## Establish Coordinated Assessment System

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



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 11

Some communities created coordinated assessment systems as part of the implementation of the Homeless Prevention and Rapid Re-Housing Program (HPRP), while other communities' systems pre-date HPRP.

Whether a community is creating a new system or relying on an existing system, the coordinated assessment system must:

- Be established and operated in collaboration with ESG recipient(s);
- Cover the full geographic area served by the CoC, which can be a regional geography;
- Be easily accessible to individuals and families seeking housing or services;
- Be well advertised;
- Use a comprehensive and standardized assessment tool;
- Meet other requirements established by HUD.



## **Centralized/Coordinated Assessment**

CoC must develop a specific policy for how the coordinated assessment system will address the needs of victims of domestic violence, dating violence, sexual assault, or stalking, but who are seeking assistance from non-victim service providers.



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 12

The CoC must develop a policy that guides consistent operation of the coordinated assessment system, with respect to how the system will triage and address the particular safety needs of individuals and families who are experiencing homelessness.

The policy must state how the system will address the needs of individuals and families that are fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking, but who are seeking assistance from non-victim service providers.

## Written Standards for CoC Assistance

CoC must work with the ESG recipient to develop written standards for providing CoC assistance

- Eligibility policies and procedures
- Determine and prioritize eligible persons for
  - Transitional Housing
  - Rapid Rehousing (RRH)
  - Permanent Supportive Housing resources (reflect standards in coordinated assessment system)
- Determine levels of RRH assistance and participant rent contribution (across projects)
- Additional standards for designated High Performing Communities (HPC)



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 13

Finally, CoCs are required to work with their ESG recipient(s) to develop written standards for providing CoC assistance.

These must include standards for determining who is eligible (beyond minimum HUD regulatory requirements) for housing resources, such as Transitional Housing, Rapid Rehousing, and Permanent Supportive Housing.

CoCs must decide the amount or percentage of rental assistance that an RRH participant should receive and similarly the amount they should contribute toward their rent.

The CoC should also help ESG and CoC recipients and subrecipients to apply those standards, through the development and implementation of consistent policies and procedures.

The CoC must develop additional standards related to administering homeless prevention assistance, if the CoC is designated as a high-performing community.



# Summary of CoC Responsibilities

## Planning

- Coordinate implementation of a housing and service system
- Plan and conduct point-in-time count
- Participate in the Consolidated Plans
- Consult with ESG recipients

## Systems Operations

- Establish performance targets, monitor performance, evaluate outcomes, and take action against poor performers
- Evaluate ESG and CoC project outcomes
- Establish a coordinated assessment system
- Develop written standards for providing assistance



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 14

Let's just take a moment to summarize all the planning and systems operations responsibilities that the CoC is required to take on as part of the CoC Program. The planning responsibilities are on the left side of the slide, and the systems operations responsibilities are on the right.

# Eligible CoC Planning Costs

- Developing a community-wide CoC process
- Determining geographic area the CoC will serve
- Developing a CoC system
- Evaluating CoC and ESG project outcomes
- Participating in Consolidated Plan
- Preparing and submitting a CoC application
- Monitoring recipients and subrecipients



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 15

One of the major changes under the CoC Program interim rule is the availability of funding to support some costs related to implementing these CoC responsibilities. Eligible CoC planning costs include the costs of:

- Developing a communitywide or region-wide process involving the coordination of all the relevant CoC stakeholders;
- Determining the geographic area that the Continuum of Care will serve;
- Developing a Continuum of Care system;
- Designing/Implementing a centralized or coordinated assessment system;
- Evaluating the outcomes of projects for which funds are awarded in the geographic area, including the Emergency Solutions Grants program;
- Participating in the consolidated plan(s) of the jurisdiction(s) in the geographic area;
- Preparing and submitting an application to HUD on behalf of the entire Continuum of Care membership, including conducting a sheltered and unsheltered point-in-time count and other data collection as required by HUD; and
- Monitoring recipients and subrecipients and enforcing compliance with program requirements.



You can obtain additional information or assistance by going to [OneCPD Resource Exchange](#) and searching the [Resource Library](#), checking out [Training & Events and News](#), using [Ask a Question](#) or [requesting technical assistance](#)



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 16

Thank you for joining us for this broadcast. Please refer to the related training materials on the CoC's responsibilities in establishing and operating a Continuum of Care that are provided on the OneCPD Resource Exchange. In the event that you have a specific question, please contact your Field Office or submit a question to the Ask-a-question section of [www.oneCPD.info](http://www.oneCPD.info)



# Thank you.

---

Continuum of Care 2.0



U.S. Department of Housing and Urban Development

CoC2.0 | Slide 17