

## Continuum of Care Program Roadmap

Slide 1 – intro music



Continuum of Care 2.0

# Continuum of Care Program Roadmap

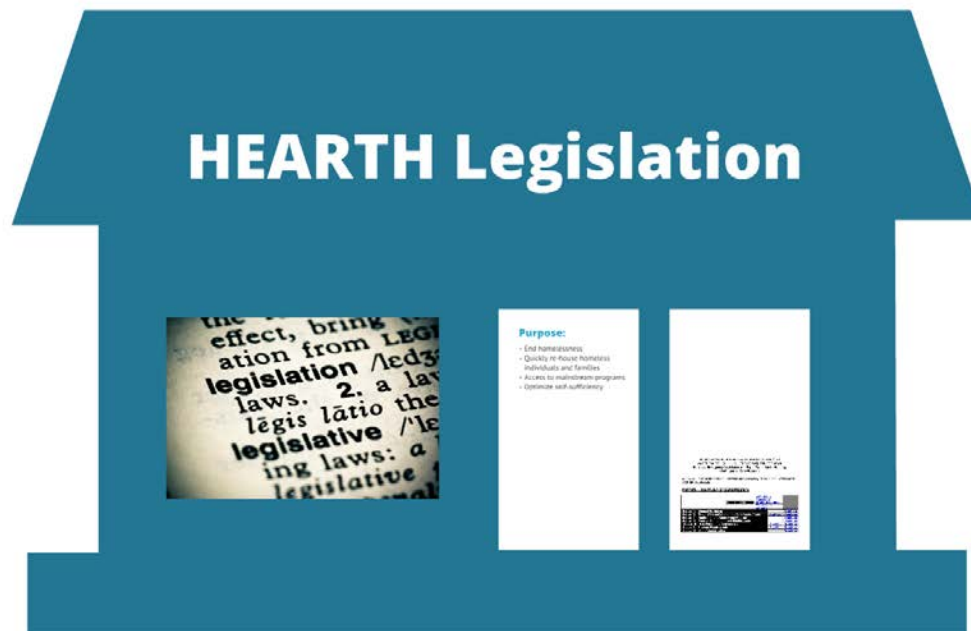
## **Slide 2**

Welcome to the US Department of Housing and Urban Development's online training curriculum for the Continuum of Care, or CoC, Program. This presentation will provide a brief tour of the CoC Program regulations and information about resources available through this online training curriculum to help you understand them. There is a lot to learn, and HUD recognizes that implementing the new requirements will be a journey, so let's start with a road trip to explore the new regulations. Thanks for joining us on this tour!



## Slide 3

The HEARTH Act amended the McKinney-Vento Homeless Assistance Act and established the Continuum of Care Program. President Obama signed the Act into law in 2009. HUD developed and published the CoC Program interim rule in 2012 to formally implement the CoC Program.



#### Slide 4

The CoC Program is designed to:

- Promote communitywide commitment to the goal of ending homelessness
- Quickly rehouse homeless individuals and families
- Promote access to and effective utilization of mainstream programs by homeless individuals and families, and
- Optimize self-sufficiency among individuals and families experiencing homelessness

## Purpose:

- End homelessness
- Quickly re-house homeless individuals and families
- Access to mainstream programs
- Optimize self-sufficiency

## Slide 5

The CoC Program interim rule is organized into seven subparts, each of which provides regulations on specific aspects of the Program. Given the broad scope and detailed requirements, the full online curriculum has been organized into small, targeted topic areas that parallel the subparts of the rule, with this presentation providing a virtual roadmap to show how all of the training resources fit together.

**DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
**24 CFR Part 578 [Docket No. FR-5476-I-01] RIN 2506-AC29**  
**Homeless Emergency Assistance and Rapid Transition to Housing:**  
**Continuum of Care Program**

**AGENCY:** Office of the Assistant Secretary for Community Planning and Development.

**ACTION:** Interim rule.

**PART 578 — CONTINUUM OF CARE PROGRAM**

Introductory Sections	<a href="#">Commenting Instructions</a>	
	<a href="#">Executive Summary</a>	
	<a href="#">Background / Summary</a>	
Subpart A – General Provisions		<a href="#">Regulation</a>
Subpart B – Establishing and Operating a Continuum of Care	<a href="#">Preamble</a>	<a href="#">Regulation</a>
Subpart C – Application and Grant Award Process		<a href="#">Regulation</a>
Subpart D – Program Components and Eligible Costs		<a href="#">Regulation</a>
Subpart E – High-Performing Communities	<a href="#">Preamble</a>	<a href="#">Regulation</a>
Subpart F – Program Requirements	<a href="#">Preamble</a>	<a href="#">Regulation</a>
Subpart G – Grant Administration		<a href="#">Regulation</a>

## Slide 6

Subpart A of the interim rule provides the purpose of the program and the definitions that apply to the CoC Program. Subpart B of the interim rule focuses on establishing and operating a Continuum of Care, including the duties that have been assigned to the CoC, while Subpart C of the interim rule provides the requirements for applying for funds under the CoC Program. Subparts D through G focus on how CoC Program grant funds can be used, and the requirements associated with administering these grants and implementing funded projects. Let's start with the CoC and its responsibilities.

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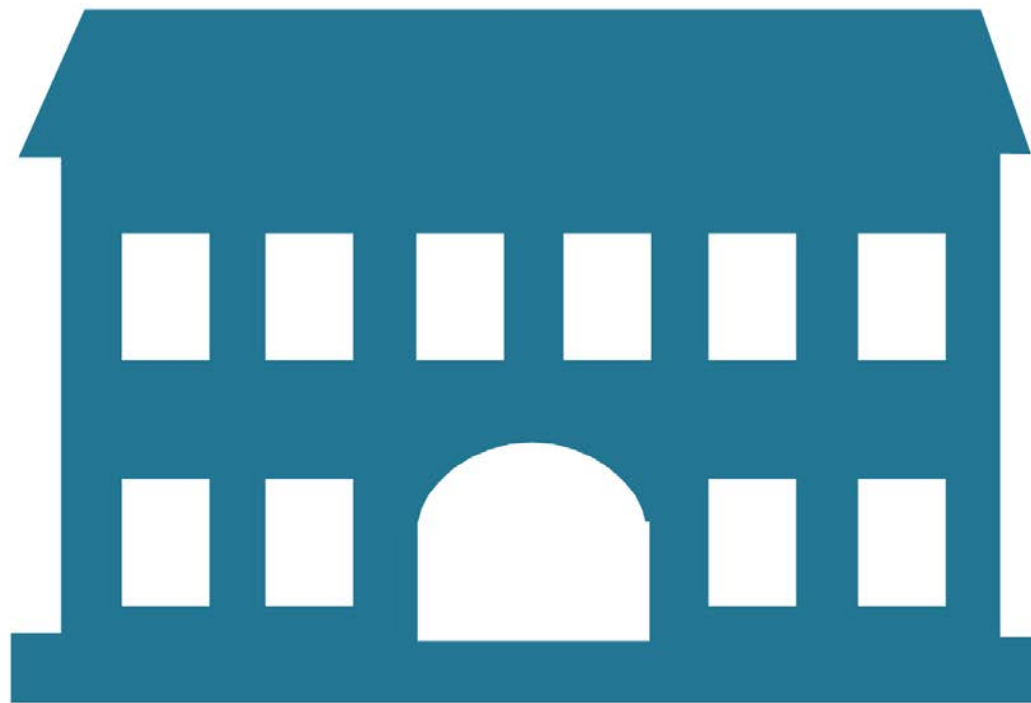
The Continuum of Care is the group responsible for carrying out the duties defined in the interim rule. The group must be composed of representatives of relevant organizations within the geographic area served by the Continuum. Once established, the CoC is required to appoint a CoC board and to designate an HMIS lead agency and a collaborative applicant to assist with its responsibilities.





## **Slide 8**

The CoC Board is the entity established by the CoC to act on its behalf. The CoC's Board must be representative of the CoC and include at least one homeless or formerly homeless person. The responsibilities of the board are dependent on how much authority is delegated to the board by the CoC. All responsibilities of the Board must be documented in the CoC's governance charter.



# **CoC Board**



## Slide 9

The Collaborative Applicant is an eligible applicant designated by the CoC to apply for HUD funds on the CoC's behalf. Unless granted additional responsibilities by the CoC that are documented in the governance charter, the collaborative applicant's sole responsibility is to compile and submit the annual application to HUD for CoC Program funds, and to apply for CoC planning funds on behalf of the CoC. Both activities are carried out on behalf of the CoC.



## **Slide 10**

The HMIS Lead is the eligible applicant that is designated by the CoC to manage the day-to-day operation of the CoC's HMIS.



## Slide 11

The CoC must also establish other workgroups or subcommittees to carry out other responsibilities of the CoC, but these must also be identified in the CoC's governance charter. A common example would be a rating and ranking committee that ranks projects for the CoC's application.



## Slide 12

The CoC Program interim rule defines three major areas of responsibility for the CoC:

- Operating a CoC
- Designating and operating a Homeless Management Information System, or HMIS, and
- Planning for a CoC's geographic area

Each of these areas includes specific responsibilities that a CoC must either take on directly or must delegate to another entity or workgroup through the governance charter.



### Slide 13

The first responsibility, operating the CoC, has two types of responsibilities within it—the first is related to operating and managing the system developed by the CoC.



## Operating a CoC



- **Governance Responsibilities**
- **System Operations Responsibilities**

## Slide 14

The second type of operating responsibility is related to the CoC's governance and structure.



# Operating a CoC



- **Governance Responsibilities**
- **System Operations Responsibilities**

## **Slide 15**

With respect to operating and managing the CoC's system, one responsibility of the CoC is to establish and operate a coordinated assessment system that provides an initial, comprehensive assessment of individuals and families to best connect them to the housing and services they need to return to, and stabilize in, permanent housing.



**Coordinated  
assessment  
system**



**Slide 16**

Additionally, the CoC is responsible for developing written standards, in consultation with ESG recipients, to guide how the agencies that provide the housing and services prioritize individuals and families eligible to receive the assistance, and the amount and type of assistance they should receive.



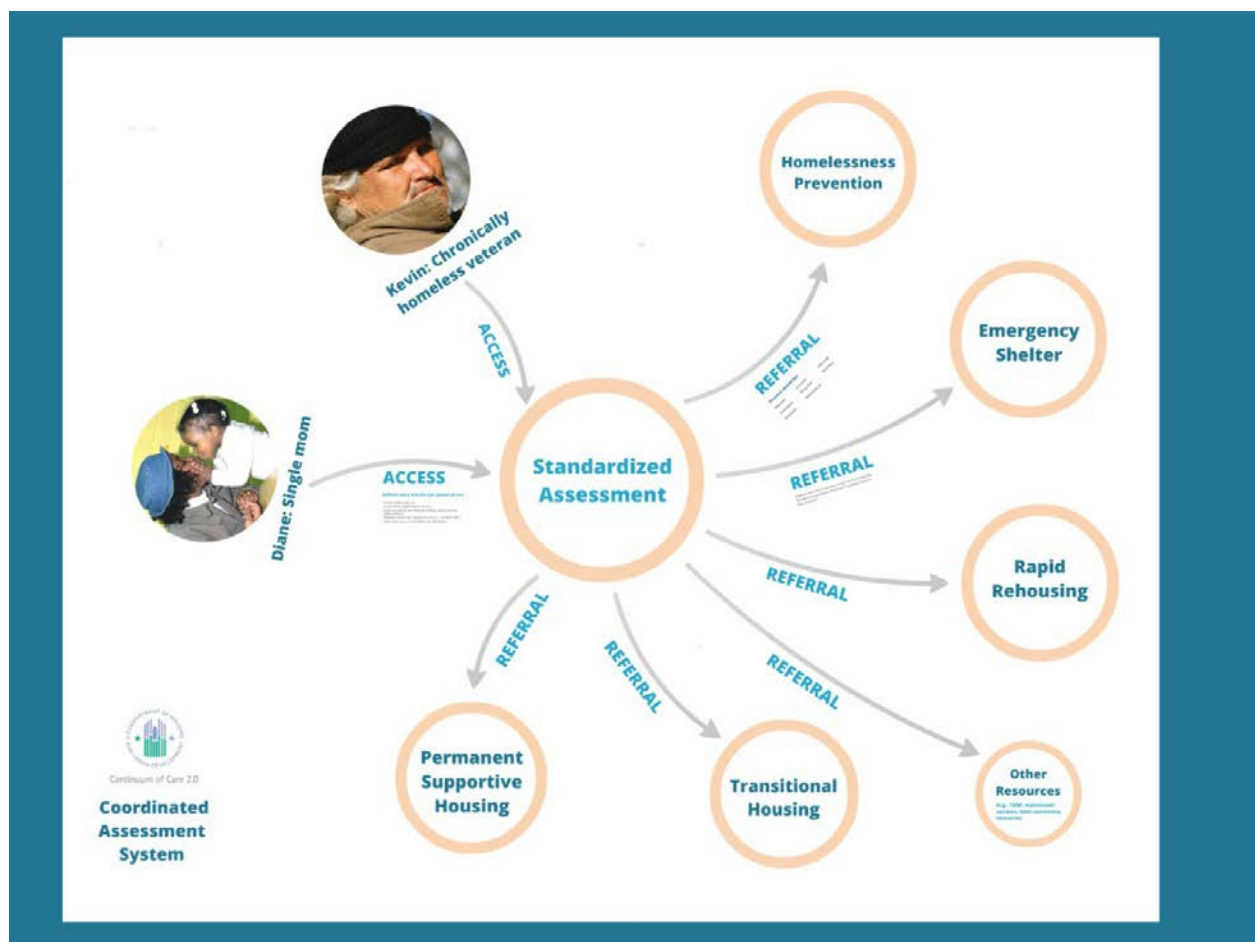
## **Slide 17**

The CoC must establish performance expectations and monitor individual project and system performance to ensure the system is functioning as effectively as possible, and that projects are meeting their performance goals.



## Slide 18

While Continuums of Care have been carrying out many of the operational responsibilities now formally assigned to the CoC through the interim rule for some time, some of the responsibilities will be new for many CoCs. In particular, the requirement to establish and operate a coordinated assessment system is new to many CoCs. Specific training resources are available to help CoCs understand the concept and expectations associated with coordinated assessment.



## Slide 19

The second area of CoC responsibilities relates to Designating and Operating an HMIS. The CoC Program interim rule clarifies that the CoC is ultimately accountable for the HMIS and specifically lays out the role of the CoC is that capacity. HMIS resources that clarify expectations and responsibilities for the HMIS lead will supplement the CoC Program online learning modules.



### • **System Operations Responsibilities**



### **Designating and Operating an HMIS**



### **Planning for a CoC's Geographic**

## Slide 20

Finally, the third area of CoC responsibilities relates to planning for a CoC's geographic area. Essentially, the CoC should understand the extent and nature of homelessness, as well as the resources already available, and develop a housing and service system that addresses the needs identified within the geographic area that the CoC services. These planning responsibilities go hand in hand with the expectation that the CoC should then actively manage the system it develops.



## Designating and Operating an HMIS

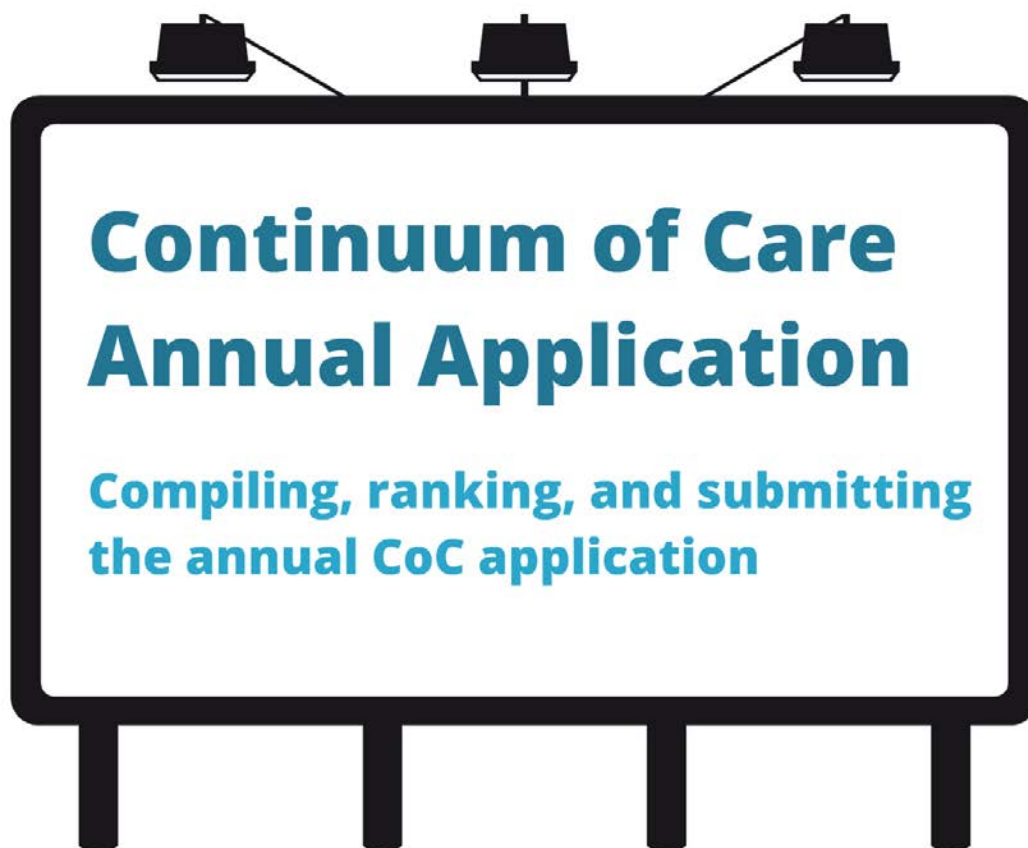


## Planning for a CoC's Geographic Area



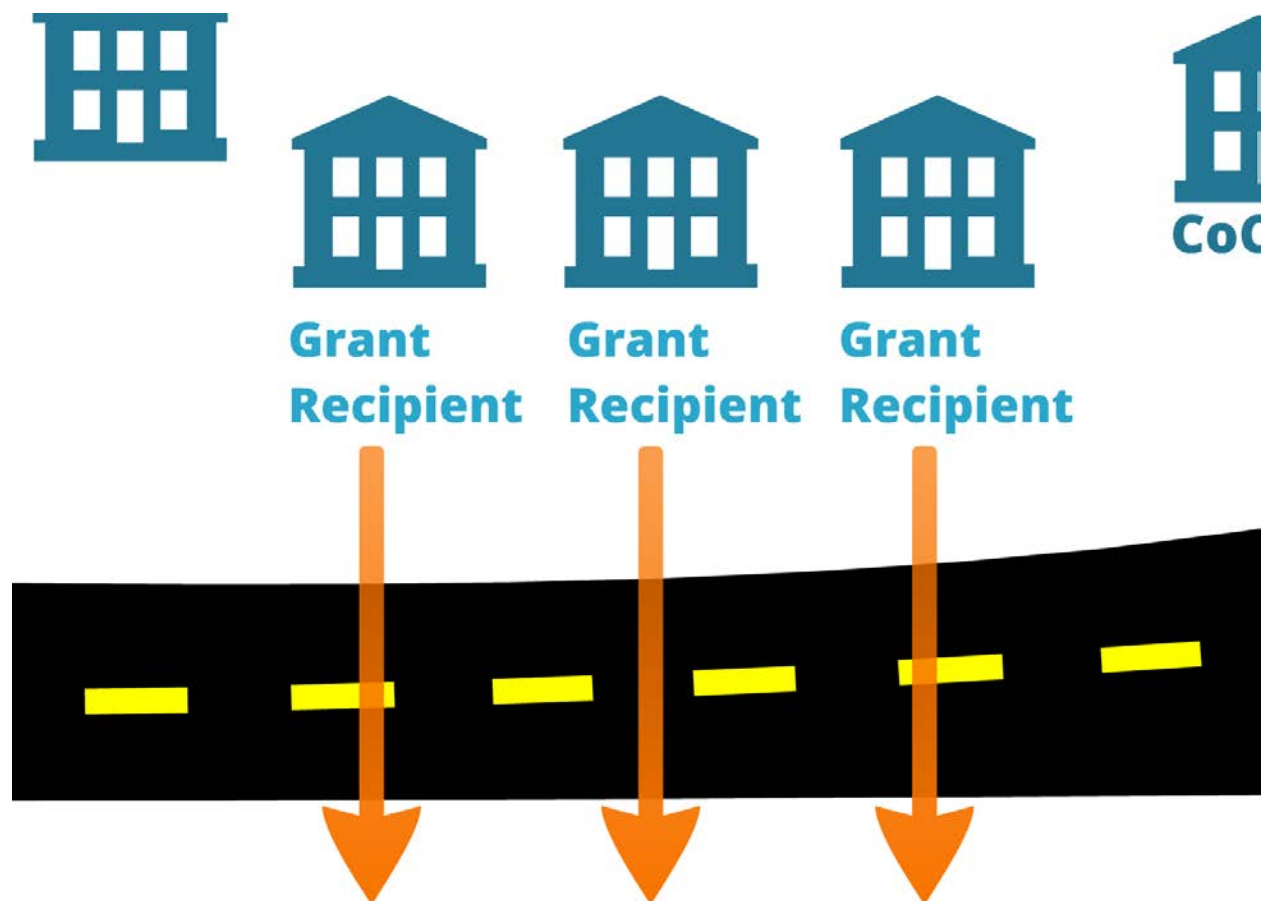
## Slide 21

As we noted before, one of the purposes of the CoC Program is to provide funding for efforts to quickly rehouse homeless individuals and families. Therefore, the Continuum has one additional role: the CoC must design and follow a collaborative process to select projects to apply for CoC Program funds. In this capacity, the CoC must work closely with its designated collaborative applicant, which is responsible for compiling all of the information required by the NOFA, and submitting the annual CoC application to HUD on behalf of the CoC.



## Slide 22

Since the CoC Program provides grants to eligible applicants, the interim rule also includes detailed requirements for applicants who may ultimately receive grants under the CoC Program, referred to as recipients.





### Slide 23

The grant related information that is covered in Subparts D through G of the CoC Program interim rule focus on:

- Program components and eligible costs
- Program requirements, and
- Grant administration requirements



## **Slide 24**

CoC Program grants will fund eligible costs under the following five program components, or types of projects: Permanent Housing, which encompasses both permanent supportive housing and Rapid Re-housing; Transitional Housing; Supportive Services Only; HMIS; and Homelessness Prevention. All CoC Program-funded projects must fit within the framework of one of these five program components. The regulations detail all five program components, the costs eligible under each, and operational considerations for each.



# **Program Components & Eligible Costs**

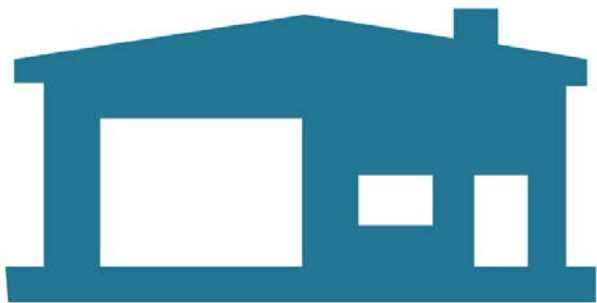
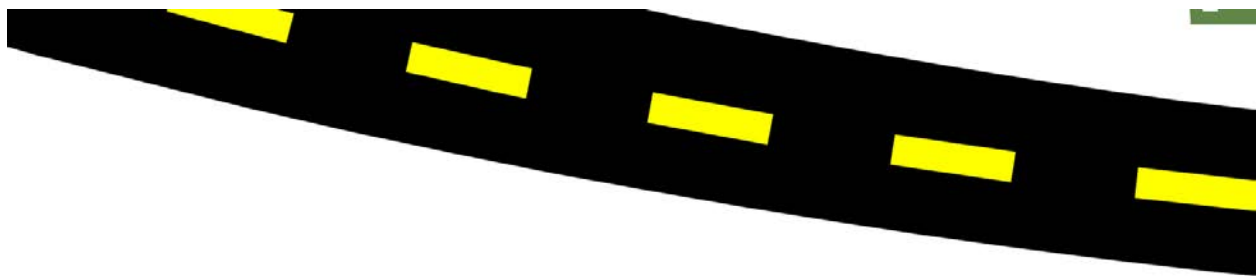
## Slide 25

The eligible costs that can be carried out within the program components will be familiar to past recipients of Supportive Housing Program and Shelter Plus Care funding, although these recipients will need to take care to review the regulations to understand the differences between the eligible costs for the CoC Program and the Supportive Housing Program and Shelter Plus Care program. Specific training resources have been developed to help applicants and recipients fully understand eligible costs.



## Slide 26

Once the applicant receives a grant award, there are different program and grant administration requirements with which the recipient must comply. Some apply up front, while others affect later phases of project operation. Some requirements must be met prior to grant agreement while the rest must be met over the term of the grant. Some of the requirements are cross-cutting federal requirements, while others relate to specific CoC Program requirements.



## Program & Grant Administration Requirements

## Slide 27

One requirement of particular interest to recipients is the match requirement. CoC Program grant recipients must match no less than 25 percent of all grant funds, excluding those designated for leasing, with cash or in-kind contributions. Sufficient match must be demonstrated prior to signing the grant agreement. Training resources will help explain allowable match and the pre- and post-award recordkeeping requirements for it.



## Slide 28

Another topic that recipients must fully understand in order to comply with grant requirements is how to determine and document eligibility, including disability status where it is required for program entry and income where rent or an occupancy charge is charged in a project. The definition of homeless, the income calculation requirements, and the definition of disability all apply to the CoC Program. Several training resources are available to help recipients understand the requirements and develop appropriate recordkeeping systems to implement them.



That wraps up our tour of the CoC Program interim rule and the associated online learning curriculum. You can see and access the full package of training resources from the OneCPD Resource Exchange Learning Management System. More tools will be added to the OneCPD Resource Exchange over time, so be sure to check the site regularly. And you can submit additional questions through the Ask A Question page on the same site. Thank you for joining HUD on this journey.







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