

2016

Guide to Coordination and Collaboration for CoCs and Consolidated Plan Jurisdictions



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INTRODUCTION

This guidance document explains both the minimum regulatory requirements regarding consultation and coordination between Continuums of Care (CoCs) and Consolidated Plan (Con Plan) jurisdictions—those that receive Emergency Solutions Grants (ESG) Program funds and those that do not—and provides suggestions for additional strategies to ensure meaningful collaboration between entities sharing the same geographic area. Although many communities already have in place the mechanisms for strong collaboration, this guide can help expand and enhance ongoing collaboration and ensure compliance with all new requirements. The guidance can be used to inform emerging community partnerships, whatever their current stage of collaboration, and their continuing evolution.

The document is organized into the following sections:

1. Collaboration Between CoCs and ESG Recipients
2. Collaboration Between CoCs and Con Plan Jurisdictions (both those that receive ESG Program funds and those that do not)
3. Strategies for Effective Collaboration

1. COLLABORATION BETWEEN COCS AND ESG RECIPIENTS

Both the CoC and ESG Program interim rules require coordination and collaboration between CoCs and ESG recipients in order to ensure the recipients effectively strategize about the systems of assistance needed to address homelessness and how their respective funding streams can support provision of that assistance. This section describes the consultation requirements for both CoCs and ESG recipients in the areas of:

- Coordinated assessment,
- Written standards for administering assistance,
- Allocation planning and reporting for ESG, and
- Suggested areas for additional coordination.

Since CoCs and ESG recipients do not always have contiguous boundaries, the first step should be determining how CoCs and ESG recipients overlap so their relative coordination responsibilities can be planned.

Identify the Concentric and Overlapping Relationships

Con Plan jurisdictions (both those that receive ESG funds and those that do not) must consult with each CoC serving their geographic area. For States, this means consulting with all CoCs within the State. For CoCs, these requirements may entail consultation with multiple ESG recipients and Con Plan jurisdictions. Because CoCs, ESG recipients, and Con Plan jurisdictions typically do not share matching geographical boundaries, there are numerous combinations of collaborative relationships that often overlap. It is worth the time and consideration to map out the different entities that must be collaborating with one another – not only to ensure that all necessary stakeholders are included in the process but also to maximize the benefit of communitywide coordination.

Collaboration on Coordinated Assessment

CoC-Specific Requirements

Each CoC is required to consult with ESG recipient(s) in its geographic area to:

- Establish and operate a coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services ((578.7(a)(8)).

ESG-Specific Requirements

- Once the CoC has developed a coordinated assessment system, each ESG-funded program or project within the CoC's area must use that assessment system. The recipient or subrecipient must work with the CoC to ensure the screening, assessment, and referral of program participants are consistent with ESG written standards required under 576.400(e). A victim service provider may choose not to use the CoC's coordinated assessment system. (576.400(d))
- If the CoC for the jurisdiction's area has established a coordinated assessment system that meets HUD requirements, the jurisdiction must describe that coordinated assessment system in the ESG-specific section of the jurisdiction's Annual Action Plan. (91.220(l)(4)(ii); 91.320(k)(3)(ii))

Each CoC is required to establish and operate a coordinated assessment system, also known as coordinated entry that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. This system must be easy to access by individuals and families seeking assistance, cover the CoC's entire geographic area, be well-advertised, and include a comprehensive and standardized assessment tool.

Since ESG recipients and subrecipients are required to use the CoC's coordinated entry process, the consultation requirement for the CoC is intended to ensure the coordinated entry design meets the needs of all ESG Program-funded projects. Beyond the minimum requirement, the CoC can only attain the goal of a comprehensive, streamlined system if most homeless providers and projects participate in the CoC's coordinated entry; therefore, CoCs should work with funded and non-funded homeless providers alike to ensure the design of coordinated entry meets their assessment needs and can replace project-specific processes to the greatest extent possible. HUD expects that consultation between the CoC and ESG Program recipients will be ongoing, as each CoC will have to routinely adjust the operations of its coordinated entry to ensure it is meeting the current needs of homeless individuals and families within its geographic area.

The following questions may help CoCs engage ESG recipients and subrecipients concerning coordinated entry:

- How do ESG and CoC providers currently collaborate and how could this be improved? Are there formal mechanisms, such as grant agreements, that could be leveraged to incent or require greater collaboration in coordinated entry?

- How do program participants currently flow into and between ESG and CoC Program funded projects and where are there disconnects between the ESG-funded and CoC-funded systems? Map the current process and then identify the front door project(s) for the crisis response system, the projects responsible for conducting the initial crisis and housing assessments, and the process for designating and communicating referrals, including referrals to homelessness prevention programs and emergency shelter.
- How integrated are the client data management systems (including HMIS) used by ESG and CoC Program recipients and subrecipients? Think about the actual systems being used, the data that are being collected, and the level of data sharing (capacity for and current practices) between and among recipients and subrecipients.
- What are the differences, if any, in the way that ESG and CoC Program recipients and subrecipients prioritize program participants for project resources and how can they be aligned?

Collaboration on Written Standards

CoC-Specific Requirements

CoCs are required to consult with ESG recipient(s) in the CoC's geographic area to:

- Establish and consistently follow written standards for providing CoC assistance. (578.7(a)(9))

The CoC must establish and follow written standards for recipients and subrecipients providing assistance with CoC Program funds. The CoC Program interim rule requires that these standards be developed in consultation with the ESG recipient(s) also funding projects within the CoC's geographic area. The specific standards that must be addressed are policies and procedures for:

1. Evaluating individuals' and families' eligibility for assistance through the CoC Program;
2. Determining and prioritizing eligible individuals and families for transitional housing assistance;
3. Determining and prioritizing eligible individuals and families for rapid re-housing assistance;
4. Determining the percentage and amount of rent program participants must pay while receiving rapid re-housing assistance;
5. Determining and prioritizing eligible individuals and families for permanent supportive housing assistance; and
6. For those CoCs that have been designated a high-performing communities:
 - a. Determining and prioritizing individuals and families for homelessness prevention and rapid re-housing assistance;
 - b. Determining the percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention and rapid re-housing assistance;

- c. Determining the amount and duration of rental assistance; and
- d. Determining the type, amount, and duration of housing stabilization and/or relocation services.

ESG recipients are required to develop several similar policies and procedures for subrecipients to use when providing ESG assistance (state recipients may allow subrecipients to develop their own written standards) (see 24 CFR 576.400(d)). **Although ESG recipients are not explicitly required to consult with CoCs on the development of written standards for providing ESG assistance**, many of the ESG standards for prioritizing assistance will influence the development and implementation of the local plan to prevent and end homelessness, the implementation of coordinated entry system, as well as the development of the CoC's written standards. Ideally, CoCs and ESG recipient(s) should collaborate to coordinate and/or align their written standards to ensure all populations eligible for assistance within the geographic area are assessed and prioritized for available assistance as consistently as possible.

The written standards for providing ESG assistance must include policies and procedures that address the following:

1. Evaluating eligibility for ESG assistance;
2. Targeting and providing essential services related to street outreach activities;
3. Admission to, diversion from, referral to, and discharge from emergency shelters;
4. Assessing, prioritizing, and re-assessing the need for essential services related to street outreach;
5. Coordination among other emergency shelter, essential service, homelessness prevention, and rapid re-housing providers as well as with other mainstream housing and service providers;
6. Determining and prioritizing individuals and families for homelessness prevention and rapid re-housing assistance;
7. Determining the percentage and amount of rental assistance and utilities each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;
8. Determining the amount and duration of rental assistance, including how the amount will be adjusted over time, as appropriate; and
9. Determining the type, amount, and duration of housing stabilization and/or relocation services.

The following questions may help guide collaboration related to developing written standards for providing ESG and CoC Program assistance:

- Are standard policies or procedures already in place on a communitywide basis for recipients or subrecipients of CoC and/or ESG Program funds? What are some of the common elements of the policies? What policies are inconsistent? What are the areas of disagreement?
- Do the written standards support and help to implement the goals of the Con Plan? The CoC plan?

- Is there evidence from local projects or nationally that could be used to inform decisions about prioritization and how to structure assistance?

Collaboration on Planning and Reporting for the ESG Program

CoC Requirements

- The Continuum must consult with ESG recipients within the CoC's geographic area on the plan for:
 - Allocating ESG program funds;
 - Reporting on the performance of ESG recipients and subrecipients; and
 - Evaluating the performance of ESG program recipients and subrecipients. (578.7(c)(5))
- The process for completing these activities must be incorporated into the CoC's governance charter.
- The CoC must evaluate outcomes of projects funded under the ESG program and the CoC program and report to HUD. (578.7(a)(7))

ESG-Specific Requirements

- ESG recipients are required to consult with each CoC that serves the recipient's jurisdiction to:
 - Determine how to allocate ESG funds;
 - Develop performance standards for projects and activities assisted with ESG funds;
 - Evaluate the outcomes of projects and activities assisted with ESG funds; and
 - Develop funding, policies, and procedures for the administration and operation of the Homeless Management Information System (HMIS). (576.400(a); 91.100(d); 91.110(e))
- In the Annual Action Plan, the jurisdiction must describe its consultation with each CoC that serves the jurisdiction in addressing the topic areas above; ((91.220(l)(4)(vi); 91.320(k)(3)(v)) and
- In the ESG-specific portion of the Consolidated Annual Performance and Evaluation Report (CAPER), the jurisdiction must include, in a form prescribed by HUD, the:
 - Number of persons assisted;
 - Types of assistance provided; and
 - Project or program outcomes data measured under the performance standards developed in consultation with the CoC. (91.520(g))

Allocation of ESG Program Funds

The ESG recipient must consult with all CoCs that provide services in the jurisdiction in determining ESG Program funding allocation priorities (by program component and geographic area) and describe this consultation in the Annual Action Plan. For each year of the Con Plan, the Con Plan jurisdiction is required to specify how it will allocate its CPD grant funds and must explain how each grant addresses needs and advances goals adopted in the Con Plan.

Jurisdictions must consult with each CoC serving their geographic area. For States, this means consulting with all CoCs within the State. Click [here](#) to access HUD's guide on *ESG State Recipient Consultation with Continuums of Care*.

CoCs are also responsible for consulting with all ESG recipients regarding the allocation of ESG program funds within the CoC's geographic area. The process for consultation must be documented in the CoC's governance charter. The intent of these requirements is to ensure that the recipients of HUD homeless grants are investing in the homeless assistance system in coordinated ways and not duplicating funding, thereby supporting the same goals and leveraging results.

In order to prepare for this consultation, the CoC and ESG recipient may want to begin by assessing the extent to which there is already alignment between the CoC's homeless strategy and ESG Program allocations. The ESG recipient should ensure that it engages the CoC at a point in the process when the CoC can provide meaningful input related to ESG planning and allocation decisions in relation to the funding opportunities available through the CoC Program. Then, the CoC and ESG recipient can proceed in a discussion about how to better align allocations to meet priority community needs and achieve optimal results, if needed.

The following questions may help to guide and advance collaboration related to allocation of ESG resources:

- How can ESG funds be used to support the homelessness prevention and assistance system envisioned by the CoC? That is, how do ESG eligible costs align with the scale and structure of program components desired by the CoC? For instance, homelessness prevention and emergency shelter are eligible costs under the ESG program. Has the CoC identified a need for less emergency shelter or more homelessness prevention assistance? If so, which type, for which subpopulations, and in which geographic areas?
- How do current ESG Program allocations support the homeless system and how might they be shifted to better support local needs?
- How are local data on needs and performance used to inform the allocation of ESG Program funds?
- Are there some community needs that cannot be met with ESG resources that could be addressed with other resources indicated in the Con Plan?

ESG Program Evaluation: ESG-Specific Section of the CAPER

Each jurisdiction that has an approved Con Plan is required to submit an annual performance report to HUD within 90 days of the close of the jurisdiction's program year.

The performance report, known as the Consolidated Annual Performance and Evaluation Report (CAPER, or PER for states), includes:

- A description of the resources made available,
- The geographic distribution and location of investment,
- The persons assisted,
- Actions to affirmatively further fair housing and
- Other actions as indicated in the Con Plan and Annual Action Plan. (24 CFR 91.520).

In addition to requiring Con Plan jurisdictions to report on and evaluate the jurisdiction's overall progress in meeting its specific objectives for reducing and ending homelessness as described in Section 2 below, the CAPER includes program-specific sections pertaining to each Con Plan program: ESG, CDBG, HOME, and HOPWA.

In the ESG-specific section of the CAPER, the jurisdiction must report on the project outcomes data measured under the performance standards developed in consultation with the CoC(s). By analyzing how these outcomes relate to system-wide performance and funding considerations, the CoC can identify the broader implications of the outcomes generated by ESG recipients and subrecipients.

The CAPER also captures the number of persons assisted by ESG and the amounts and types of ESG assistance provided. The CoC should provide information to the jurisdiction in the development of the responses as necessary (including providing data from the HMIS). Refer to the Consolidated Plan User Guide and the [Consolidated Plan in IDIS Desk Guide](#) for information about how to complete the CAPER, Annual Action Plan, and Con Plan.

The CAPER requires citizen participation. HUD recommends that the CoC and its stakeholders attend the public hearings on the performance reports. Citizen participation is vital to the development of successful planning and reporting, and is a crucial element in promoting community-based solutions.

ESG Performance Standards

ESG recipients and CoCs must coordinate to develop performance standards for evaluating effectiveness of ESG Program-funded activities within a CoC's geographic area. ESG recipients must describe this consultation in the Annual Action Plan and CoCs must incorporate the process for consulting ESG recipient(s) in their governance charter. The performance standards should address the degree to which ESG Program-funded service providers are succeeding in:

- Targeting those who most need assistance;
- Reducing the number of people living on the streets or in emergency shelters;
- Reducing the time people spend homeless; and
- Reducing program participants' housing barriers or housing stability risks.

Achievement of these standards will also support improved performance of the homeless service system overall. The CoC and ESG recipient should use HMIS and other pertinent

data collected in the community to assist with evaluating ESG activities within the context of broader system performance and inform subsequent ESG and CoC Program allocations. The following questions may help guide CoC and ESG recipients in developing performance standards to evaluate ESG activities:

- Are ESG-Program funded activities effective at fulfilling the needs they were intended to meet?
- Are local communities currently using project-level performance standards for ESG activities? If yes, what standards are being used and how were they developed?
- In addition to the project-level standards, does the ESG recipient measure project performance within the context of broader homeless system performance measures? If yes, how do ESG Program-funded activities contribute to the achievement of this performance?
- What challenges may be expected in implementing performance standards? How can they be mitigated?
- Has there been a crosswalk between the proposed ESG performance standards and any other State and local standards to see how they align? If so, how well do the proposed ESG performance standards align with other State and local performance standards? Are there ways to improve alignment to simplify measurement and reduce the burden for local organizations that are funded by multiple sources?
- How will subrecipients collect and report performance data? How will the measures be integrated into HMIS?
- What role will the CoC play in monitoring the performance of the ESG recipient(s) and subrecipients?

Participation in HMIS

CoCs are responsible for implementing a single HMIS to be used by recipients and subrecipients of ESG and CoC Program funds within that CoC's geographic area. The CoC is responsible for designating the HMIS lead – the entity responsible for managing the HMIS; reviewing, revising, and approving a security plan, a privacy plan, and a data quality plan for the HMIS; and ensuring that CoC and ESG Program recipients consistently use the HMIS. Since ESG recipients and subrecipients are required to use the HMIS of the CoC in the geographic area in which the project is located, it is important that ESG recipient(s) are a part of the discussions about how the HMIS will be funded and the policies and procedures for operating and administering the HMIS. ESG recipient(s) must work with the CoC to identify funding and develop policies, and procedures for operating and administering the HMIS, particularly in regard to the required participation of all ESG-funded subrecipients. CoC and ESG recipients should work together to determine the cost of HMIS participation for ESG recipients and subrecipients.

Although the CoC may delegate many of its HMIS oversight responsibilities to the HMIS lead or a subcommittee, the CoC and ESG recipient should both still be an active part of this process since the CoC is responsible for the HMIS and since HMIS is likely to be a key source of data to assess performance of ESG Program-funded activities and the homeless assistance system.

The following questions may help guide discussions as CoCs and ESG recipients work together to ensure full HMIS participation by ESG recipients and subrecipients:

- Is the ESG recipient comfortable with the current HMIS policies and procedures? Is more collaboration or consultation needed as the policies and procedures are regularly updated and revised? Is a different form of collaboration or consultation needed?
- Are additional data elements needed in HMIS to support local ESG recipient reporting needs?
- Are ESG recipients and subrecipients aware of their responsibilities related to HMIS? Do any agencies need training on their responsibilities? What resources are needed to train them on HMIS and compliance with the adopted policies and procedures, including data collection, privacy, and security requirements?
- Do ESG recipients and subrecipients have the resources they need to participate in the HMIS? If no, can the recipient allocate more ESG Program funding for HMIS? Are there other sources of funding that can help pay for participation in HMIS?
- Are any victim services providers funded with ESG? If so, do they have comparable databases that they can use to fulfill their HMIS participation requirements?

Optional Areas for Collaboration between ESG Recipients and CoCs

Though not formally required, closer collaboration between CoCs and ESG recipients may be possible and useful to improve consistency in service delivery, allocation decisions, data collection, and community-level alignment with respect to priority populations. Additional collaboration can also ensure that homeless systems are operating effectively relative to HUD-defined system-level performance measures. For instance, since ESG Programs can fund homelessness prevention, their resources are needed to minimize the number of people who become homeless, and both ESG and CoC Programs fund projects that affect people's length of time homeless and housing-related outcomes. Possible areas include, but are not limited to, the following:

Local Criteria for the Definition of "At Risk of Homelessness"

The ESG and CoC Program interim rules include a definition of at risk of homelessness that allows the ESG recipient to establish locally-defined characteristics. Individuals and families meeting the definition of at risk of homelessness based on these locally defined characteristics would permit that individual or family to be eligible for homelessness prevention funded through the ESG and CoC Programs. (Note: only CoCs that are designated as High Performing Communities by HUD are able to use CoC Program funds to carry out homelessness prevention activities.) The specific criterion within the definition of "at risk of homelessness" that can be defined locally is for individuals and families living in "housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Consolidated Plan" (see 576.2(1)(iii)(G)). Use of this criterion requires the jurisdiction to articulate the specific characteristics within the homelessness needs assessment in the Con Plan/Annual Action Plan. The CoC can play an important role in helping the ESG recipient identify and define the characteristics that will enable ESG recipients to target those most likely to become homeless absent assistance.

Discharge Planning

ESG recipients and recipients of CoC Program funds that are State or local governments are required to establish and implement discharge policies that prevent people from being discharged from publicly-funded systems of care into homelessness. As part of their annual submission to HUD, these State or local governments are required to certify that they will establish discharge policies and protocols in the Con Plan of these jurisdictions. Additionally, each year, in the CoC Program application, Continuums are scored on how they coordinate with and/or assist in State or local discharge planning efforts. Collaboration between those persons responsible for discharge planning at the State and local government levels and those with experience and knowledge in homelessness (including the incidences of discharges from public institutions into homelessness) can be an invaluable way to ensure that established policies are informed by what works—and does not work—in practice.

System Planning

In the CoC Program interim rule, the Continuum is charged with developing a plan to coordinate the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. At a minimum, such system must encompass: outreach, engagement, and assessment; shelter, housing, and supportive services; and prevention strategies. ESG recipients should work closely with the CoC to develop the plan to ensure ESG Program funds can be leveraged as effectively as possible to support the elements identified within the plan. ESG recipient involvement is particularly important since CoC Program funds cannot be used to fund shelter or prevention (unless the CoC is designated as a High Priority Community).

2. COLLABORATION BETWEEN COCs AND CON PLAN JURISDICTIONS

The Con Plan is the primary planning, prioritization, and resource allocation document that Con Plan jurisdictions use to target HUD formula funds for community planning and development, including for preventing and ending homelessness. The Con Plan process provides an opportunity to focus local, State, and Federal attention and resources on resolving the housing needs of those who are homeless or at risk of homelessness within the context of all services and supports available to a jurisdiction. Since the geographic boundaries of the Con Plan jurisdiction and CoC may not align, a CoC may need to plan for collaboration with multiple Con Plan jurisdictions, and conversely, a Con Plan jurisdiction may need to plan for collaboration with multiple CoCs.

To achieve meaningful collaboration with a Con Plan jurisdiction, a CoC must understand the jurisdiction's primary mechanism of planning and reporting, the timing of the Con Plan processes for each jurisdiction covered by the CoC, and the role that the CoC may play in the process. The Con Plan is a multi-year document – three to five years depending on the type of jurisdiction completing it – with associated annual action plans that link proposed allocations with priorities and goals established in the jurisdiction's Con Plan. To develop a Con Plan, jurisdictions must engage in comprehensive strategic planning that builds on citizen participation, leverages local, State, and Federal resources, and reduces duplication of effort. The resulting strategic plan provides a roadmap for the development of major housing, homelessness, and community development objectives. For more information on the Con Plan process and regulations, please see [HUD's Consolidated Planning webpage](#).

In the past, CoCs' involvement in the Con Plan process varied widely across the nation, primarily based on whether there were established relationships between the Con Plan jurisdiction and the CoC. All CoCs should be able to have a more intentional role in the process now that the new Con Plan regulations require all State and local jurisdictions that prepare a Con Plan to consult with the CoC and additional groups on: (1) preparation of their homelessness strategy, and (2) development of plans to allocate resources to address the needs of homeless individuals and families and people at risk of homelessness. CoCs can also play an integral role in jurisdictions' consolidated planning process as a source of information for the homelessness components of the Con Plan.

This section describes the consolidated planning consultation requirements for CoCs and Con Plan jurisdictions (those jurisdictions that receive ESG funds and those that do not), followed by suggested ways that both entities may improve their collaboration on the specific homelessness components of the Con Plan. The table below demonstrates the various ways that CoCs, Con Plan jurisdictions, and ESG recipients are required to collaborate. The table also documents the number and type of these entities nationwide.

CON PLAN JURISDICTION/CoC COLLABORATION						
Con Plan Jurisdictions (#) <i>MC= Metropolitan City UC = Urban County</i>				CoCs (#)		
States	Territories	Entitlements		405		
51	4	MC	UC			
		1008	185			
Areas of Collaboration						
CON PLAN	Homeless Needs Assessment			➔	Provide PIT & HMIS data	
	Inventory of Homeless Services & Facilities			➔	Provide HIC data	
	Homeless Strategy			➔	Consult	
	Annual Action Plan (Homeless Activities)					
	CAPER			➔	Provide relevant data; consult	
Certification of Consistency with Con Plan			➔	CoC Application		
ESG RECIPIENT/CoC COLLABORATION						
ESG Recipients (#) <i>(Con Plan Jurisdictions with ESG Award)</i>				CoCs (#)		
States	Territories	Entitlements		405		
51	4	MC	UC			
		194	114			
Areas of Collaboration						
ACTION PLAN	Allocation of ESG funds			➔	Consult	
	Developing ESG Written Standards					
	Developing ESG Performance Standards					
	Evaluating ESG Outcomes					
	HMIS (developing funding, policies & procedures)					
Consult			➔	Establish CoC Written Standards		
Use system; ensure screening, assessment, referrals are consistent with ESG written standards			➔	Establish Coordinated Entry System		

Consolidated Planning Consultation Requirements

CoC Requirements

- The Continuum must develop a plan that includes providing information required to complete the Con Plans within the CoC's geographic area; (578.7(c)(4))
- A CoC applicant that is a State or a unit of general local government must have a HUD-approved, complete or abbreviated, Con Plan in accordance with 24 CFR Part 91; (578.27(a))
- A CoC applicant that is a State or a unit of general local government must submit a certification that the application for funding is consistent with the HUD-approved Con Plan(s) for the jurisdiction(s) in which the proposed project will be located. Funded applicants must certify in a grant agreement that they are following the HUD-approved Con Plan; (578.27(a));
- A CoC applicant that is not a State or unit of general local government must submit a certification by the jurisdiction(s) in which the proposed project will be located that the applicant's application for funding is consistent with the jurisdiction's HUD-approved Con Plan. (578.27(b)).

Requirements for Continuums of Care

There are several requirements in the CoC Program interim rule that facilitate coordination between CoCs and Con Plan jurisdictions regarding the Con Plan process. Applicants for CoC Program funding must coordinate with Con Plan jurisdictions to ensure that their application is consistent with the HUD-approved Con Plan(s) for the jurisdiction(s) in which the proposed project will be located. Applicants that are States or units of general local government must also have their own HUD-approved Con Plan, and certify in their grant agreement that they are following this plan.

Consultation between CoCs and Con Plan jurisdictions, and a CoC's participation in the public comment process as the Con Plan jurisdiction is developing its Con Plan, can help ensure that the CoC's plan to prevent and end homelessness, and thus the projects it funds, is consistent with the Con Plan. Additionally, consideration of the priorities set forth in the Con Plan for the jurisdiction could inform the CoCs' ranking and selection process of project applications if the Con Plan identifies a certain housing or service need within the jurisdiction that can be filled with a CoC Program grant.

Conversely, Section 578.7(c)(4) of the CoC Program interim rule requires CoCs to include in their plan how they will provide information required to complete the Con Plans within the CoC's geographic area, to ensure the Con Plan jurisdiction(s) set priorities informed by a CoC's understanding of need. Con Plan jurisdictions must rely on CoCs to obtain Point in Time (PIT), Homeless Inventory Count (HIC), and other HMIS data necessary for specific elements of the Con Plan. When a CoC's boundaries include multiple Con Plan jurisdictions, that Continuum must be able to disaggregate CoC-wide data for each Con Plan jurisdiction. States, territories, and local Con Plan jurisdictions with multiple CoCs need to compile relevant data from all of Continuums within their geographic area. CoCs and Con Plan

jurisdictions should collaborate in determining the best way to effectively and efficiently share homeless data.

Due to the integrated nature of the requirements covered in this section, it would be beneficial if CoCs and Con Plan jurisdictions collaborated to develop a single, streamlined process for meeting these distinct requirements.

Requirements for Con Plan Jurisdictions

Con Plan Jurisdiction Requirements

Each Con Plan jurisdiction is required to consult with all CoCs that serve the jurisdiction's geographic area when preparing the portions of the Con Plan describing the jurisdiction's:

- Homeless strategy
- Resources available to address the needs of homeless persons, particularly
 - Chronically homeless individuals and families,
 - Families with children,
 - Veterans and their families
 - Unaccompanied youth
- Resources available to address the needs of persons at risk of homelessness (91.100(a)(2)(i); 91.110(b)(1))

The jurisdiction must include in its Con Plan a concise summary of the jurisdiction's activities to enhance coordination with the CoC (91.215(l); 91.315(l))

The jurisdiction shall describe its consultations with all CoCs that serve the jurisdiction's geographic area (91.200(b)(3)(i); 91.300(b)(3)(i))

The Con Plan regulations at 24 CFR Part 91, as amended by the ESG Program interim rule, articulate specific areas in which Con Plan jurisdictions—regardless of whether or not they receive ESG funds—must consult with the CoC. The specific areas are:

- 1) The description of the Homeless Strategy; and
- 2) Resources available to address the needs of homeless persons and persons at risk of homelessness.

CoCs are similarly charged with developing a strategy to address homelessness. Active collaboration between the CoC and Consolidated Plan jurisdiction(s) may save time and ensure that the strategies in the CoC's plan and the Con Plan are consistent, thereby enabling shared implementation efforts. The CoC can also help the Con Plan jurisdiction engage the required stakeholders in its planning process. By helping these stakeholders maintain consistency in their focus and target resources in complementary ways, collaboration can improve how effectively CoCs and Con Plan jurisdictions meet their program goals.

The sections below provide an overview of all Con Plan sections for which consultation between CoCs and Con Plan jurisdictions is relevant. Each section header identifies the Con Plan template screen in eCon Planning Suite where the information is captured.

Consultation (24 CFR 91.100(a)(2)(i) and 91.110(b)(1)) – Screen PR-10

All jurisdictions must submit, as a part of the consultation section of the Con Plan, narratives describing: 1) coordination with CoCs and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness; and 2) how the goals of the jurisdiction's strategic plan overlaps with the goals of all relevant CoCs' plans.

Although not required, Con Plan jurisdictions may find it helpful to consult with CoCs to share additional information about other public and private resources available in the community that address homeless needs, so that they may be identified in the Con Plan.

Con Plan jurisdictions must also consult with the following entities: public and private agencies that provide housing, health, social services, domestic violence victim services, employment, or education services; publicly funded institutions and systems of care that may discharge persons into homelessness; and business and civic leaders. Many CoCs may already consult with these stakeholders and can work to engage them more formally in the Con Plan process, in partnership with the relevant Con Plan jurisdictions.

Homeless Needs Assessment (24 CFR parts 91.205 and 91.305) – Screens NA-40 and NA-10

For this part of the Con Plan, jurisdictions must describe the nature and extent of sheltered and unsheltered homelessness, by racial and ethnic group and including rural homelessness, within their geographic area. The data reported here is based on the data collected through the PIT and HIC counts. The Con Plan regulations for local governments require that, at a minimum, the Con Plan jurisdiction must use PIT and HMIS data to complete this section. It is critical for Con Plan jurisdictions to work with local CoCs to estimate the Con Plan jurisdiction-level data that corresponds to their geographical area. CoC-level data is already available from [CPD Maps](#).

The conforming amendments to the Con Plan regulations at 24 CFR Part 91 establish that the following four subpopulations must be included in this description (see screen NA-40):

- Chronically homeless individuals and families;
- Families with children;
- Veterans and their families; and
- Unaccompanied youth.

Within each of these subpopulations, the description must include an estimate of number of persons that fall into the following categories:

- The number of persons experiencing homelessness on a given night (sheltered and unsheltered);
- The number of persons who experience homelessness each year;

- The number of persons who lose their housing and become homeless each year;
- The number of persons who exit homelessness each year;
- The number of days that persons experience homelessness; and
- Other measures specified by HUD.

Although it predominantly contains data for the housing needs assessment, screen NA-10 does include several narratives pertaining to the homeless needs assessment section of Part 91, which are summarized below:

- Describe the characteristics and needs of low- and extremely low-income individuals and families with children who are at risk of becoming homeless. This information may be evidenced by the characteristics and needs of individuals and families with children who are currently entering the homeless assistance system or appearing for the first time on the streets;
- If a Con Plan jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimate;
- Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness.

Note: This narrative is only required if an ESG recipient has chosen to identify housing characteristics associated with instability and an increased risk of homelessness per paragraph 24 CFR 576.2(iii)(G) of the “at risk of homelessness” definition.

The purpose of these narratives is for Con Plan jurisdictions to identify predictors of homelessness in their community in order to determine how to allocate resources and meet local needs for homelessness prevention. This type of data should be helpful to Con Plan jurisdictions as they consider how to focus limited housing assistance resources.

Housing Needs Assessment (24 CFR 91.205 and 91.305) – Screen NA-10

In this section of the Con Plan, the jurisdiction summarizes its estimated housing needs projected for the ensuing 3- to 5-year period. Needs are described according to the categories listed in the regulations, which include income level, tenure, and household type, and by housing problems, including cost burden, overcrowding, and substandard housing conditions.

While the Con Plan regulation has always required Con Plan jurisdictions to estimate the number and type of households that need housing assistance, the conforming amendments to 24 CFR Part 91 include an additional household type: **formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.** There may be some households that exhaust their eligibility for a rapid re-housing program and need additional assistance to remain stably housed. This new category is included so that Con Plan jurisdictions can track these households, both to prevent relapses back into homelessness, and to improve their community’s ability to target short- and long-term housing subsidies in the future.

Screen NA-10 in the eCon Planning Suite requires Con Plan jurisdictions to provide a narrative that both discusses the needs of formerly homeless families and individuals

who are receiving rapid re-housing assistance and are nearing the termination of that assistance, and includes an estimate of the number and type of these households. Although not required, consultation with the applicable CoCs is recommended to ensure that the individuals and families served by rapid re-housing projects within the Continuum(s) are included in this total.

Housing Market Analysis (24 CFR 91.210 and 91.310) – Screen MA-30

The housing market analysis (24 CFR 91.210 and 91.310) is intended to describe the environment in which the Con Plan jurisdiction administers its programs. More specifically, Con Plan jurisdictions must assess their inventory of housing, facilities, and services to identify both the barriers and the resources available to address housing and homeless needs.

The conforming amendments to 24 CFR Part 91 added “housing” to the section of the market analysis pertaining to the Con Plan jurisdiction’s inventory of facilities and services that meet the needs of homeless individuals and families (see 24 CFR 91.210(c) and 91.310(c)). **Con Plan jurisdictions must identify those facilities, services, and housing that are targeted for chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.** The inventory of services must include mainstream services such as health, mental health, and employment services (to the extent those services can complement services targeted to homeless persons) in addition to services targeted to homeless persons. Jurisdictions should also include non-HUD funded housing in their inventory as reflected on the HIC.

Much of the information in the other housing market analysis screens is pre-populated in IDIS. However, Con Plan jurisdictions will need to work with the CoCs that cover their geography to obtain HIC, services inventory, and HMIS data to complete the inventory for homeless facilities, services, and housing on screen MA-30.

Strategic Plan—Homeless Strategy (24 CFR 91.215 and 91.315) – Screen SP-60

Part 91 of the interim rule requires Con Plan jurisdictions, in consultation with the CoC(s), to identify strategies to address the housing and supportive service needs of families and individuals that are homeless or at risk of homelessness.

As outlined in 24 CFR 91.215 and 91.315, Con Plan jurisdictions are required to describe their strategy to reduce and end homelessness with respect to the following four areas:

1. Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs;
2. Addressing the emergency shelter and transitional housing needs of homeless persons;
3. Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing

individuals and families who were recently homeless from becoming homeless again; and

4. Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from publicly funded institutions or systems of care into homelessness or are receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The Plan should incorporate strategies expected to be funded with resources available through the CoC Program competition. The CoC can also help develop strategies to use the federal resources made available from HUD to leverage “other” private and public resources, including how any matching requirements are satisfied.

Many elements of the CoC plan (homeless needs, inventory, strategy, and priorities) correspond to the homeless elements required by the Con Plan. This is intentional. HUD guidelines and guidance seek to integrate the two planning processes and have the two processes inform each other. Where appropriate, a jurisdiction may attach relevant portions of the CoC plan and include any supplementary information necessary to complete the Con Plan, such as the CoC’s HIC, the community’s discharge coordination policy, and community and/or regional plans to end homelessness or chronic homelessness.

Where a jurisdiction’s geography encompasses multiple CoCs, each CoC’s plan should be coordinated with the jurisdiction’s Con Plan. States may consider including a combination of goals from all of the CoCs in the state, including the goals from the State Interagency Homeless Plan.

The following questions may help guide collaboration related to development of the Con Plan homeless strategy:

- Are the Con Plan jurisdiction’s strategies for all of the areas listed above consistent with the CoCs’ strategies?
- What data does the CoC have, such as HMIS data or other local research, that will help stakeholders understand whether community needs in these areas are being met and to inform the development of priorities for these strategic areas? What data does the Con Plan jurisdiction have to help understand community needs?
- Has the CoC already analyzed the data to do its needs/gaps analysis? What was the outcome? How can the community address any of the strategic areas not currently identified or ineffectively implemented? Are there gaps in services or needs that are not currently being met?
- How can the community maximize resources to address each of the four strategic areas?
- Are there subpopulations or special emphases that should be prioritized in any of these areas to achieve the most impact on community needs?
- What community resources (e.g., universities or private foundations) are available to assist communities in developing their strategy? How can the CoC and jurisdiction collaborate to leverage this resource for each planning process?

Strategic Plan—Institutional Structure (24 CFR 91.215 and 91.315) – Screen SP-40

Each Con Plan jurisdiction is required to provide a summary of the institutional structure through which it will carry out its housing, homeless, and community development activities. In the ESG Program interim rule, the list of entities that should be included in this description is broadened to include the CoC, philanthropic organizations, and public departments and agencies in addition to those entities previously listed at 24 CFR 91.215(k) and 91.315(k). States must also include businesses, developers, community-based and faith-based organizations in its description. This change is intended to ensure that each Con Plan jurisdiction is thoughtful about the interplay between various parts of their local housing and services system.

The description of the institutional structure is addressed on screen SP-40, which also includes a Homeless Services Table, where Con Plan jurisdictions indicate the homelessness prevention, street outreach, and supportive services that are either available in the community, targeted to homeless persons, or targeted to people with HIV/AIDS.

Strategic Plan—Summary of Coordination (24 CFR 91.215 and 91.315) – PR-10

Con Plan jurisdictions are required to describe the activities designed to enhance coordination among the CoC; public and assisted housing providers; and private and government health, mental health, and service agencies. The description must include the jurisdiction's efforts to enhance the coordination of housing assistance and services for currently homeless persons and recently homeless persons and, in turn, recently re-housed persons.

Action Plan—One-year Homelessness Goals and Action Steps (24 CFR parts 91.220(i) and 91.320(h)) – Screens AP-65 and AP-15

On screen AP-65, Con Plan jurisdictions are required to specify the activities they plan to undertake with its HUD formula funds over the next year in order to: address emergency shelter and transitional housing needs of homeless individuals and families (including subpopulations); prevent low-income individuals and families with children (especially those with incomes below 30 percent of median family income) from becoming homeless; help homeless persons make the transition to permanent housing and independent living; implement specific action steps to end chronic homelessness; and, in accordance with 24 CFR parts 91.215(e) and 91.315(e), to address the special needs of persons who are not homeless. In these narratives, jurisdictions should also include any CoC Program-funded projects that will address homelessness within the jurisdiction.

On screen AP-15, which captures all anticipated resources, Con Plan jurisdictions should include new federal resources expected to be available during the year, including funding awarded from the CoC Program competition, to address emergency and transitional housing needs of homeless individuals and families, help homeless persons make the transition to permanent housing, and prevent homelessness. The CoC can also help inform the description of how the federal resources made available from HUD leverage other private and public resources, including how any matching requirements were satisfied.

CAPER Components Requiring Consultation

Within 90 days of the end of each Con Plan program year, Con Plan jurisdictions must report on the actual spending invested and associated results for the year in the CAPER. Specifically, Con Plan jurisdictions must provide a description of the actual resources made available, the geographic distribution and location of investment, the number of families and persons assisted, actions to affirmatively further fair housing, and progress on other actions indicated in the Con Plan and Annual Action Plan (see 24 CFR 91.520). Con Plan jurisdictions will need the CoC(s) to provide data in order to complete the sections of the CAPER related to homelessness.

The CoC should become familiar with the Con Plan jurisdiction's assessment of its performance. The two general sections of the CAPER that address homelessness are Affordable Housing (see 24 CFR 91.520(b)) and Homelessness (see 24 CFR 91.520(c)). The Affordable Housing section of the CAPER captures the number of homeless persons served (see Screen CR-20 of the CAPER template in IDIS), and the Homelessness section of the CAPER requires the jurisdiction to describe its progress in meeting its specific objectives for reducing and ending homelessness as established in the Con Plan, and if applicable, the CoC plan (see screen CR-25 of the CAPER template in IDIS). The jurisdiction and CoC can work together to address in the narratives any barriers that have had a negative impact on progress.

This section should include a report of any new Federal resources obtained during the year from the CoC competition to prevent homelessness, address emergency and transitional housing needs of homeless individuals and families and help homeless persons make the transition to permanent housing. Again, the CoC can help inform the description of how the federal resources made available from HUD leverage "other" private and public resources, including how any matching requirements were satisfied. Specifically, the narrative must address:

- **Outreach:** Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs (24 CFR 91.520(c)(1));
- **Housing Needs of Homeless Persons:** Addressing the emergency shelter and transitional housing needs of homeless persons (24 CFR 91.520(c)(2));
- **Homeless Assistance:** Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living including shortening the period of time that individuals and families to affordable housing units, and preventing individuals and families who are recently homeless from becoming homeless again (24 CFR 91.520(c)(3); and
- **Homelessness Prevention:** Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are:
 - Likely to become homeless after being discharged from publically funded institutions and systems of care (such as health-care facilities, mental health facilities, foster care, and other youth facilities, corrections programs, and institutions);
 - Receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs. (24 CFR 91.520 (c)(4)

The jurisdiction and CoC can draft these narratives collaboratively, or the jurisdiction could have the CoC review and comment on a finalized draft. The narratives could also include any efforts

to develop and implement a CoC strategy to assist homeless persons in transitioning to permanent housing and independent living, such as actions taken to:

- Prevent homelessness, and
- Address the emergency shelter and transitional needs of homeless individuals and families (including significant subpopulations, such as those living on the streets).

As previously noted, ESG recipients must complete the ESG-only portion of the CAPER. Since much of the information will come from the HMIS, the CoC is expected to play an important role in completion of the CAPER.

3. STRATEGIES FOR EFFECTIVE COLLABORATION

Independent of the publication of the ESG and CoC Program interim rules, many CoCs have been actively involved in shared planning in their respective local jurisdictions. This practice offers several important lessons in how CoCs may promote effective collaboration. ***Please note that while this section of the guide highlights principles of successful practice, these principles are presented here only as suggestions. They are not requirements under the CoC or ESG Program interim rules.***

Assess Current Relationships

- The first step toward building a collaborative relationship is to assess the current state of the relationship between the CoC and the jurisdiction. Even though there may be coordination occurring now, ultimately the CoC should strive for a fully collaborative relationship with the jurisdiction. Thus, both entities may want to consider how to implement strategies to maximize the effectiveness of their relationship with one another.

Identify the Goals and Objectives of Collaboration

- Ensure that community leaders have a clear understanding of the objectives, obligations, and boundaries of the intended collaboration. Each entity, whether a CoC or ESG recipient, has the ultimate authority to make final decisions about the allocation of grant funds and the homeless strategy. However, communities are better equipped to strategically target scarce resources in the most impactful way when stakeholders are able to coordinate efforts and agree to common strategies, objectives, and goals.
- Remember that the CoC Program and the jurisdiction's formula funding can target different parts of the community's homeless response system. The ways in which each funding source is used to support strategies to address homelessness may vary, but resources should be employed in concert, to support a coherent approach within the geographic areas that are served by multiple recipients.
- Establish a mutually agreed upon and clearly defined vision for the homeless system that serves the shared geographic area.
- Develop a common understanding of, and agreement on, the overall goals of collaboration while respecting various stakeholders' perspectives.

Ensure that the Appropriate Stakeholders Are at the Table

- Capitalize on the existing infrastructure and organization related to homelessness planning. If formal planning bodies or local homelessness advisory committees are already in place, tap into existing processes to leverage the participation of such entities and reduce duplication of effort.
- Identify stakeholders that are skilled and competent and are committed to providing ongoing leadership and developing new leaders.
- Encourage the involvement of new and additional stakeholders, including various types of service providers, HMIS staff, and local homelessness planning groups, whose experience can enhance the homelessness planning process.
- Reach out to ESG subrecipients and emergency service providers and include them in the collaboration between ESG recipients and CoCs. Engage them in the work of the CoC, as they may not already have a strong connection with the CoC. These types of connections can give providers a broader perspective of the community's overall efforts to combat homelessness and can facilitate better coordination and support between direct service providers.
- Provide context, training, and background information as needed. Given that stakeholders have varying degrees of familiarity with the respective funding sources and programs, it is helpful to ensure that everyone starts with a common understanding, and that information is updated regularly as HUD programs and requirements and/or local personnel change.
- Ensure that the Con Plan citizen participation process facilitates input from all stakeholders, including homeless persons.

Encourage Meaningful Participation

- To ensure active and informed consent, clearly define the roles, responsibilities, and expectations of stakeholders.
- Actively involve stakeholders from the CoC, the jurisdiction, and its subrecipients in establishing goals and objectives, identifying major activities to be carried out, negotiating roles and responsibilities, and creating operating procedures for community-wide collaboration.
- Commit to a minimum threshold of productive, respectful, and effective communication.
- Provide program participants with concrete objectives in order to make it easier to focus on the topics of interest and obtain desired feedback via clearly prescribed mechanisms.
- Share information about each entity's goals and objectives; regularly report on progress with respect to achieving those goals/objectives, including lessons learned and challenges encountered.
- Discuss interagency competition and turf issues up front to ensure that they do not derail the collaborative process. To retain transparency and trust, plan to revisit these issues regularly.
- Ensure that leaders are skilled in facilitating group processes. Acknowledge that disagreements are expected, and ensure that leaders have the skills to manage conflict.

Effective collaborators handle conflict constructively and recognize that, in dynamic and multiple-stakeholder environments, a certain degree of conflict is normal.

Identify and Pursue Best Mechanisms for Collaboration

The following are among the several mechanisms for CoC collaboration with the ESG recipient(s) or the Con Plan jurisdiction:

- Stakeholder meetings
- Work groups or advisory groups
- Collaborative development of plans or policies
- Collaborative funding decisions
- Historical relationships among the CoC, jurisdiction, and the jurisdiction’s subrecipients vary widely from community to community; thus, no one mechanism best serves every community. Any of the following approaches, or some combination of approaches, may help advance the achievement of collaboration.

Approach #1: Stakeholder Meetings	
Convene regular meetings of representatives of the CoC leadership and the Con Plan jurisdiction. The meetings may include additional key stakeholders as well, such as leaders from other homeless planning committees or networks.	
Strengths	Considerations
<ul style="list-style-type: none"> • Establishes formal communication between CoC and the Con Plan jurisdiction’s leaders. • Obtains feedback from other key stakeholders not part of Con Plan programs or the CoC but who are instrumental in planning. • Engages a wide number of stakeholders simultaneously and gains a wide range of perspectives. 	<ul style="list-style-type: none"> • Ensure attendance by the appropriate stakeholders. • Distinguish between stakeholder meetings designed to gain input and smaller stakeholder meetings designed to accomplish concrete planning. • Establish clear objectives for meetings and clearly articulate the function of the meetings in the collaborative process. • Involve key stakeholders in formulating the meeting agenda.

Approach #2: Work Groups or Advisory Groups

Given the large number of topics on which the CoC and jurisdiction *must* collaborate, it may be helpful to establish work groups or advisory groups to address specific topics. For example, recipients could create a coordinated entry work group that includes representatives from each key stakeholder. Other topics for advisory groups may include the coordination of funding, HMIS, and performance measurement standards.

Strengths	Considerations
<ul style="list-style-type: none"> • Provides a concrete, focused role for stakeholders to provide input. • Focuses discussion on specific areas and objectives. • Facilitates meaningful discussion. 	<ul style="list-style-type: none"> • Ensure that the appropriate stakeholders are engaged in the relevant work group. • Depending on the size and capacity of the community, possibly assign certain stakeholders to more than one work group.

Approach #3: Collaborative Development of Plans and Policies

Collaborative development of plans for funding or service coordination or of policies governing performance measurements, HMIS, or written standards helps ensure the inclusion of a wide range of perspectives, as is consistent with the spirit of the ESG and CoC Program interim rules. An alternative to collaborative development is for stakeholders to review drafts of evolving documents and provide input.

Strengths	Considerations
<ul style="list-style-type: none"> • Provides concrete information to which stakeholders may react. • Increases the likelihood that feedback related to key topics will be addressed. • Facilitates the discussion of highly specific details and issues. • Clearly spells out and answers specific questions. 	<ul style="list-style-type: none"> • Be clear about the desired type of review and comments. • Provide adequate background information to stakeholders, ensuring that they understand existing processes and new requirements. • Remain open to hearing and responding to all feedback on documents and policies to ensure buy-in. • Develop process for incorporating comments, including resolving disagreeing comments

Approach # 4: Collaborative Funding Decisions

The CoC and the ESG recipient(s) may choose to make funding decisions collaboratively or to set up a formal mechanism for providing input on ESG funding and allocation decisions. Examples include the following:

- Awarding bonus points to subrecipients that obtain a letter of support from the CoC as part of an application for funding.
- Creating a scale to rate the level of applicant involvement with the CoC that can be used in scoring applications
- Jointly determining funding priorities and allocation amounts

Strengths	Considerations
<ul style="list-style-type: none"> • Ensures that funding allocations address the needs of a wide range of stakeholders. • Increases subrecipients' engagement in CoC processes. • Tailors funding to local needs and CoC priorities. 	<ul style="list-style-type: none"> • Priorities of CoC and ESG may not immediately coincide. • May need to create basic decision-making guidelines in order to ensure consistency in rating criteria between stakeholders.

Potential Challenges and Solutions

Based on the structure and capacity of the CoC and the nature of its relationship with the Con Plan jurisdiction, it is reasonable to expect challenges to arise during the consultation process. Some of the challenges—as well as potential solutions—are listed on the following page.

It is important to keep in mind that collaboration is an ongoing and evolving process, and it may take time to develop a wholly effective process. Building on existing community partnerships and/or initiating new partnerships grounded in central issues such as performance measurement, written standards, and strategic priority setting is an excellent basis for collective decision making and resource allocation.

Challenge	Potential Solutions
Identifying all of the relevant stakeholders	Oftentimes, community stakeholders tend to work in silos, without necessarily having relationships with other funders or providers. Taking the time to map out the different entities that must be collaborating with one another is an important first step in developing collaborative relationships – not only to ensure that all necessary stakeholders are included in the process but also to maximize the benefit of communitywide coordination.
Disagreement between State and local government planning goals and CoC planning priorities	Ask each stakeholder organization to prioritize its goals and identify where it has flexibility to adapt goals to the needs of other stakeholders. If conflicts arise with respect to non-negotiable goals, addressing such conflicts early in the process will help minimize later frustration. Drawing on the goals of a variety of stakeholders, consider ways to meet all the goals of the homelessness strategies.
Different perspectives in approaches to ending homelessness	Ensure that all participating stakeholders understand the reasoning behind the approach taken to ending homelessness and fostering open discussion on the differences in stakeholder approaches. Make sure that each stakeholder understands the perspectives of other stakeholders. Recognize that stakeholders who need to change their views or approaches will need training and support and that change takes time. To provide national context, it may help to review background on the HEARTH Act and <i>Opening Doors</i> . ¹ For example, a CoC or ESG recipient could host sessions to watch HUD webinars as a group and then discuss the content and priorities therein.
Collaboration with several governments	Provide opportunities for representatives of several government entities (State and local) to assemble during the planning process in order to foster collaboration across all stakeholders.
Limited understanding of new ESG and CoC Program regulations	Provide an overview of the interim rules in community-based workshops and meetings and discuss the implication of the rules. Review existing technical assistance materials as a community and discuss the material presented in the guidance.
Lack of familiarity or interaction between CoC and ESG stakeholders	Solicit feedback or participation from ESG and CoC Program funded agencies to encourage collaboration from the start. Ensure that agencies are familiar with both ESG and CoC Programs, including eligible costs and eligible program participants. The CoC/ESG consultation process may also provide an opportunity to increase communication amongst subrecipients, as well as between the subrecipients, ESG recipient, and CoC. This can increase the level of subrecipient participation in the CoC planning process in the long run.

¹ HUD has provided numerous webinars and other information about the HEARTH Act in the Homelessness Resource Exchange. The U.S. Interagency Council on Homelessness has information about [Opening Doors](#) on its website.

Challenge	Potential Solutions
Stakeholders' variable understanding and/or capacity	Provide adequate background and context at the start of the collaboration process. Identify stakeholders that may need more information or assistance in order to engage fully in meaningful planning and provide support. This may include setting aside time to discuss plans and proposals and/or scheduling sessions at multiple times so that even organizations with limited staff can attend. Connect stakeholders with limited capacity with stakeholders that may be able to provide additional planning support.
Planning and collaboration in large Balance of State CoCs	If regional planning groups exist within the Balance of State CoC, they should be engaged in the collaboration process. In the absence of such groups, solicit input from agencies across the state to identify similar and unique needs. Consider subdividing planning into smaller regions that better reflect the service systems that operate within the geographic area served by the CoC, or similarly by a large Con Plan jurisdiction.
Staff Turnover	Ensure that staff is involved at different levels. Include representatives from different groups within the stakeholder's organization in the collaboration process. This provides for multiple perspectives and avoids relying on only representative at a given organization.