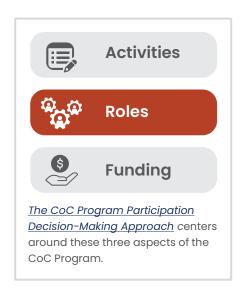# CoC Program Recipient and CoC Roles

The Continuum of Care (CoC) Program funds activities for two types of roles—recipients and Continuums of Care (CoCs). This resource identifies the recipient and CoC roles and responsibilities identified in the CoC Program Interim Rule.

In general, recipients operate projects and engage in activities as part of the CoC; a CoC is the organizing structure made up of a group of organizations that leads the CoC activities and supports all recipients within its area. Choosing to be a recipient now and being part of an existing CoC does not need to be permanent. An organization new to the CoC Program could take incremental steps to learn about the CoC and gain experience meeting program responsibilities, and then, later, choose to establish a new CoC. Essentially, joining an existing CoC could be a short-term step with the longer-term goal of forming a new CoC.

	Activities
	Roles
	Funding

The CoC Program Participation Decision-Making Approach centers around these three aspects of the CoC Program.

The Role of a Recipient

Recipients have numerous responsibilities when they are part of a CoC and receive CoC Program funds.

Submitting applications

Each organization that would like to apply for CoC Program funding (referred to as a project applicant) needs to work with the CoC to submit the application. Project applicants do not submit applications directly to HUD; instead, the project applicant first submits its application to the local CoC, the CoC rates and ranks projects locally to determine which applications can be submitted to HUD for review, and then the CoC instructs project applicants to submit their applications to HUD electronically in *e-snaps* (HUD's application and grants management system for the CoC Program).

Operating housing and homeless services programs

When an organization receives an award for funds, it is referred to as a recipient. A recipient receives CoC Program funds to operate a housing program and provide services that support the people who meet the definitions of persons experiencing homelessness or housing instability. HUD has published definitions that identify the circumstances when a household is eligible to receive assistance. The

published definitions make sure that all programs funded with CoC Program funds are consistently assisting people that meet HUD's homeless definition.

Participating in CoC-related activities

As a recipient in the CoC Program, an organization has responsibilities beyond operating its housing program and providing services. The recipient is part of a network of organizations that work together to reduce the number of people experiencing homelessness and provide people with housing and services. When this group of organizations agree to work collectively, they form a CoC. The recipient is part of a CoC and has many responsibilities to participate in CoC-related activities. For example, a recipient attends meetings with other organizations in the CoC, participates in data collection efforts to identify people experiencing homelessness and/or housing insecurity, and works with the system that coordinates referrals to organizations throughout the CoC.

The Role of a CoC

"CoC" is a term that refers to a group of organizations that work together to address the needs of people experiencing homelessness and/or housing insecurity in a community.

Types of Organizations in a CoC

Educational Institutions	Health Facilities	Law Enforcement Agencies	Municipal Governments	County Governments
Affordable Housing Developers		Continuum of Care		Tribal Governments
Providers of Social Services	Mental Health Agencies	Public Housing Organizations	Faith-based Organizations	Victim Service Providers

Not all of them receive CoC Program funding, but they are represented in the CoC membership.

A CoC's primary functions are to deliver housing and supportive services to meet the specific needs of the community and ensure mainstream services are accessible and effective for individuals and families in need. Establishing a CoC reflects a community-wide commitment to end homelessness and put a system in place to prevent homelessness. HUD uses CoCs to distribute funds to eligible applicants, which include nonprofit providers, State and local governments, Tribes, and Tribally Designated Housing Entities (TDHEs), to address the housing needs of individuals and families who

are experiencing homelessness. The 2021 Consolidated Appropriations Act expanded participation in the CoC Program to Tribes and TDHEs, which can choose to participate by joining an existing CoC or forming their own CoC.

A CoC is also responsible for making sure that each organization that operates a CoC Program-funded project (i.e., the "recipient") collects data about people experiencing homelessness and/or housing insecurity and enters it into a central data collection system referred to as the Homeless Management Information System or "HMIS." The CoC identifies one of its organizations to be the "HMIS Lead" to carry out these responsibilities.

One additional CoC responsibility is to establish a central system—called a Coordinated Entry System—that identifies people eligible for housing and services and provides referrals to the individual organizations that operate housing programs and provide services to those enrolled.

The Collaborative Applicant, HMIS lead agency, and Coordinated Entry System lead agency can be the same or different organizations.

Comparing CoC and Recipient Responsibilities

The table below identifies CoC and recipient responsibilities identified in the CoC Program Interim Rule. This table describes **most** responsibilities, but it is not a comprehensive list of required activities. Everyone working with CoC Program funds should become familiar with CoC Program laws, regulations, and notices.

CoC Responsibilities	Recipient Responsibilities
Establish a CoC Board	**Participate in CoC Board activities**
A CoC Board represents the relevant organizations in the community and acts on behalf of the CoC.	*Recipients play an active role in the CoC Board.*
▪ Adopt and follow a written process to select the CoC Board	▪ Serve on the CoC Board
▪ Be representative of the relevant organizations and projects serving people experiencing homelessness and/or housing insecurity	▪ Serve on committees, as needed
▪ Include at least one homeless or formerly homeless individual on the CoC Board	
▪ Appoint additional committees, subcommittees, or workgroups	

CoC Responsibilities

Recipient Responsibilities

Designate the Collaborative Applicant

Each CoC selects one organization referred to as the Collaborative Applicant to manage many CoC tasks.

- Select an organization that will implement the responsibilities of the Collaborative Applicant

Note: See the Funds for Other Activities: CoC Planning, HMIS Dedicated, and SSO-CE section below for more details about CoC Planning grants, which provide funding for Collaborative Applicants to fulfill its responsibilities.

Coordinate with the CoC's designed Collaborative Applicant

Recipients are responsible for coordinating with the Collaborative Applicant to fulfill CoC-related activities.

Operate the CoC

The CoC Board has ongoing responsibilities to keep the CoC operating.

- Develop, follow, and update a governance charter each year
- Develop a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the Board
- Hold meetings of the full membership at least twice annually and include published agendas
- Publicly invite new members at least annually
- Work with organizations that run CoC Program-funded housing and homeless services program to establish performance targets for programs, assist varying subpopulations of people receiving assistance, monitor organizational performance, evaluate outcomes, and consider how to address poor performing programs

Work within the CoC

Recipients are required to comply with policies and procedures established by the CoC.

- Ensure compliance with written standards and policies and procedures established by the CoC
- Provide insight to the CoC for performance targets, such as subpopulations, organizational performance, outcomes, and poor performance

Conduct annual data collection

CoCs must undertake data collection efforts each year in January. They are referred to as the Point-in-Time (PIT) count and Housing Inventory Count (HIC).

- Identify the number of people experiencing homelessness in the community
- Determine the number of available housing units and beds
- Plan and coordinate with recipients
- Report data into a required HUD reporting system: Homeless Data Exchange (HDX)

Participate in annual data collection

Recipients are responsible for annual data collection and must follow data reporting requirements.

- Participate in the annual data collection efforts, such as by having staff work with teams locating persons experiencing homelessness
- Ensure the count is accurate and the data is submitted to the CoC

CoC Responsibilities

Recipient Responsibilities

Coordinate services

Each CoC creates a "Coordinated Entry System" (CES), which is used by organizations that provide housing assistance and services to the homeless population.

- Create and manage a system to help people experiencing homelessness find the right organization to help them with their specific needs
- Designate a lead CES agency
- Establish written policies and procedures regarding access, prioritization, assessments, and referral placement
- Define coordinated entry participation coverage

Participate in the system to coordinate services

Recipients must follow the processes in place for the CoC's Coordinated Entry System (CES).

- Ensure that people who have been identified as homeless are referred to the CES
- Accept referrals from the CES when a person in need is matched with the project

Submit the CoC Application

Each CoC is responsible for submitting the CoC's application package (the "Consolidated Application").

- Solicit, review, and rank all organizations that intend to apply for funding
- Ensure data is accurate to complete application
- Conduct an inventory of projects where there is potential to reallocate funds for a new project
- Review quantitative data on housing projects, people experiencing homelessness, and people receiving housing and homeless services
- Choose which applications will be submitted to HUD based on local ranking and review process
- Ensure project applicants submit their application(s) into an electronic portal called *e-snaps*

Apply for funding

Recipients are responsible for submitting their project application(s) to the CoC and, if selected by the CoC, submitting their project applications to HUD in e-snaps. (At this point in the process, the role is as a "project applicant.")

- Complete application according to CoC's timeline
- Upload application in portal following the guidance of the CoC and confirm receipt with Collaborative Applicant
- If edits to the application are requested, complete them and resubmit the application to the CoC by the deadline provided
- Capture accurate quantitative information on who is currently being served
- Keep documentation that the organization has the capacity to spend funds according to grant agreement and/or notice of funding opportunity

CoC Responsibilities

Recipient Responsibilities

Implement use of Homeless Management Information System (HMIS) database

Each CoC must use data to better inform homeless policy and decision making at the federal, state, and local levels.

- Select an HMIS lead organization
- Select a software solution that complies with HUD's data collection, management, and reporting standards
- Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS
- Ensure consistent participation of recipients and subrecipients in the HMIS
- Ensure the HMIS is administered in compliance with requirements prescribed by HUD
  Note: See the Other CoC-Level Activities: CoC Planning, HMIS Dedicated, and SSO-CE section below for more details about a grant specifically for HMIS work.

Use HMIS database

Recipients must understand data requirements and report on data collected via the CoC's selected database.

- Understand HMIS data standards, including demographics, living situation before enrollment, and living situation for discharge
- Input data into the CoC's selected database, according to data standards

Determine participant's eligibility

Each CoC must develop and implement written standards for providing CoC assistance, such as policies and procedures for evaluating individuals and family eligibility for assistance.

- Establish, and consistently follow written standards for evaluating individuals' and families' eligibility for assistance under the CoC Program
- Ensure compliance with CoC policies and procedures for determining and prioritizing which eligible individuals and families will receive housing services

Consideration: People who might seem like they are homeless may not meet the CoC Program's homeless definition, in which case the funds cannot be used to house or assist them.

Implement eligibility criteria

Recipients must comply with the written standards for providing CoC assistance.

- Ensure the project is adhering to CoC Program eligibility requirements
- Comply with homeless definitions as defined in the Criteria and Recordkeeping Requirements for Definition of Homelessness document

CoC Responsibilities

Recipient Responsibilities

Comply with the Fair Housing Act

Each CoC must ensure recipients and subrecipients provide access to housing services in a nondiscriminatory way that includes all people that are eligible for services in the CoC.

- Implement programs in a manner that affirmatively furthers fair housing
- Affirmatively market housing and supportive services to all eligible persons, regardless of race, color, national origin, religion, sex, age, familial status, or handicap
- Provide accessible and integrative housing and services for persons with disabilities
- Prohibit involuntary family separation

Note: The Fair Housing Act explains terms, discriminatory practices, exemptions, and administrative enforcement. explains terms, discriminatory practices, exemptions, and administrative enforcement.

Comply with the Fair Housing Act

Recipients and subrecipients must provide access to housing services in a nondiscriminatory way that includes all people that are eligible for services.

- Comply with fair housing requirements
- Ensure any preferences for housing subpopulations of homeless individuals and families who need the specialized supportive services that are provided in the housing are compliant with the Fair Housing Act
- Provide individuals and families with information on their rights under applicable federal, Tribal, State, and local fair housing and civil rights laws
- Ensure housing and supportive services program are in an integrated setting appropriate to the needs of persons with disabilities

Participate in the Consolidated Plan process

Each CoC must provide information for the consolidated plan for their geographic area.

- Consult with the States and local governments responsible for developing a Consolidated Plan to provide information needed to complete the plan within the CoC's geography
- Conduct an annual gaps analysis of the homeless needs and services available within the geographic area

Note: The Consolidated Plan is designed to help states and local jurisdictions assess their affordable housing needs and market conditions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing priorities that will align and focus additional funding.

Recipients do not participate in the Consolidated Plan process.

CoC Responsibilities

Recipient Responsibilities

Monitor recipients

Each CoC must ensure that recipients satisfy all conditions of the execution of their grant agreement.

- Measure the progress in meeting needs of people experiencing homelessness within the community
- Ensure CoC Program requirements and agreements are met related to environmental review, site control, matching funds, and documentation of financial feasibility
- Comply with the CoC Interim Rule
- Follow adequate fiscal control and accounting procedures
- Ensure program funds are used in accordance with regulatory and CoC Program Notice of Funding Opportunity requirements
- Conduct performance reviews
- Ensure grant closeout is appropriately undertaken

Monitor housing services project

Recipients are responsible for monitoring their projects to ensure compliance with program requirements.

- Conduct self-monitoring for project operations and financial operations; keep records and documentation that demonstrates funds have been spent according to the grant agreement
- Prepare for site visits from HUD Field Offices
- Communicate with Collaborative Applicant for technical assistance before being monitored
- Participate in any monitoring or performance reviews conducted by the CoC

Other CoC-Level Activities: CoC Planning, HMIS, and Coordinated Entry

In addition to funding housing and homeless services activities, HUD provides funding for CoCs to engage in CoC-level activities.

- **CoC Planning Activities**: Funds are awarded to the CoC's Collaborative Applicant to fulfill responsibilities related to operating the CoC.
- **Homeless Management Information System (HMIS) Activities**: Funds are awarded to the CoC's HMIS Lead to develop, operate, and maintain the HMIS database for the CoC.
- **Supportive Services Only – Coordinated Entry (SSO-CE) Activities**: Funds are awarded to the organization that operates the CoC's coordinated entry system.

Examples of the eligible activities under each of these three grants are as follows:

Types of Funding	Eligible Funded Activities
CoC Planning	- Develop a process involving the coordination of various organizations and homeless or formerly homeless individuals and families - Determine the area that the CoC will serve - Develop a CoC housing and service system - Evaluate the outcomes of projects with CoC Program funds - Participate in the Consolidated Plan(s) in the CoC's geographic area - Prepare and submit the Consolidated Application to HUD on behalf of the CoC membership - Monitor recipients and subrecipients and enforce compliance with program requirements
HMIS Dedicated	- Purchase or lease computer hardware - Obtain technical support - Pay salaries for personnel operating database - Train personnel on using the database - Maintain database
Supportive Services Only – Coordinated Entry (SSO-CE)	- Develop and implement the CoC's coordinated entry process - Engage in outreach services - Conduct assessments with persons experiencing homelessness and connect them to housing and other resources

Worksheet 1: Reflecting on Roles and Responsibilities

This worksheet offers discussion questions to reflect on your interest and readiness for each of the roles. While some responsibilities need to be met before HUD can award funds, you can set the timeline that works for your community for undertaking these responsibilities. Communities should take into consideration that fully participating in the CoC Program can be a long process, whether you intend to join an existing CoC or establish a new CoC. Keep in mind, too, that each role requires funding from other sources to get started.

Review and complete the following questions, as they pertain to your community. These questions are intended to prompt community discussions on each topic, which would then lead to your community response of "yes," "no," or "unsure."

Recipient Role

Could someone in your organization serve on the CoC Board and/or committees?

Do you have the ability to participate in HMIS?

Are there concerns with collecting sensitive client-level information (name, social security number, disability information?

Would you be willing to participate in the coordinated entry process, which requires coordinating with the designated referral organization for people needing housing and homeless services?

Could you commit staff, time, and resources to participate in the annual Point-in-Time (PIT) Count and Housing Inventory Count (HIC)?

Do you have resources to participate in the CoC activities and operate a housing and/or homeless services program prior to being reimbursed by the CoC Program?

Does your organization have the additional bandwidth needed to take on a new program (e.g., design a project, submit the application, and operate and monitor the project)?

Is there Tribal Council support for organizations that want to pursue funding from the CoC Program?

Having reviewed these questions above, does your organization have the capacity to coordinate and participate in CoC-level and project operational activities?

👥 CoC Role

Do you have leadership support to stand up a CoC?

Is there a commitment of staff, time, and resources to operate a CoC and designate a CoC Board and committees?

Do you have a community-wide commitment to engage in activities to address homelessness?

Are there Tribal organizations who would be able to work together to address homelessness?

Are there Tribal organizations that are already doing some of these activities?

Among the Tribal organizations who are or would be involved in the CoC Program, is there an organization that could assume the responsibilities of the Collaborative Applicant?

Does the organization that could be the Collaborative Applicant have the capacity to manage the application process for the CoC and apply for a CoC Planning grant?

Does the organization that could be the Collaborative Applicant have the capacity to monitor and evaluate the organizations that would be operating projects in the community?

Among the Tribal organizations who are or would be involved in the CoC Program, is there an organization that could develop and operate a coordinated entry system?

Do you have the IT support and infrastructure necessary to implement the HMIS?

Is there a commitment of staff, time, and resources to conduct the annual Point-in-Time (PIT) Count and Housing Inventory Count (HIC)?

Having reviewed these questions above, does your Tribal community have the capacity to coordinate CoC Program activities?

Next Steps

Now that you have a better understanding of the recipient and CoC roles and responsibilities in the CoC Program, you may already know whether you want to participate in the CoC Program. If you have decided not to participate, we thank you for considering the CoC Program and welcome you to review these resources again in the future if you are interested.

If you are still considering participating, the *CoC Program Series for Tribal Communities and Organizations New to the CoC Program* has been designed first to describe a *CoC Program Participation Decision-Making Approach* centered around the program's activities, roles, and potential funding. Then, it offers resources about those specific topics, with information and worksheets that lay the foundation for using the *CoC Program Participation Decision and Assessment* resource to decide whether you will be *Continuing the CoC Program Paths*.

If you are already familiar with the *CoC Program Participation Decision-Making Approach* and the *CoC Program Activities* resource, we recommend you continue with *Determining the Amount of Available CoC Program Funds*, describing how CoC Program funding works.

Determining the Amount of Available CoC Program Funds ▶	**Participation Decision and Assessment** ▶	**Continue the CoC Program Paths** ▶
Tribal communities can identify the potential amount of funding available for projects and CoC Planning grants.	Tribes and TDHEs can discuss questions focused on participating in the CoC Program and choosing a path to join an existing CoC or establish a new CoC.	Tribes and TDHEs can review the suggested activities for pursuing their chosen CoC Program path.

Ask-a-Question ▶

If you would like to ask a question, please submit your question through the above portal.

Request Assistance ▶

If you would like more in-depth assistance about the CoC Program, please request technical assistance through the above portal.

ⓘ If you would like to connect with HUD staff, contact information is here: **HUD's 10 Field Offices** and **HUD's 6 ONAP Area Offices**

ICF