Continuum of Care Governance and Structure: Guidance for Technical Assistance Providers

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Purpose of this Document: This document seeks to furnish guidance to TA providers preparing to offer technical assistance on Continuum of Care structure and governance issues. It does **not** attempt to cover the requirements described in the CoC Interim Rule, nor does it attempt to summarize the extensive materials (e.g., the CoC Board Tool Kit) developed to provide *substantive* assistance to communities that are reorganizing their Continuum. Most importantly, this document does **not** offer any recommendations or judgments about how a CoC should be structured and governed. The intended audience for this document is TA providers, and its purpose is to provide background perspective about the options, challenges, and requirements attendant to supporting communities in assessing and possibly changing the structure and governance of their CoC, and to suggest strategies for facilitating what might be a difficult community discussion/process.

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Introduction and Context

In its CoC Interim Rule, HUD provides, for the first time, regulatory guidance about how a Continuum of Care should be organized and governed, the constituencies that should be integrated into that framework, and the responsibilities that need to be fulfilled. While the regulations are specific about some matters, they leave considerable discretion to individual CoCs, many of which have been functioning for 10 to 20 years.

A primary goal of CoC structure and governance-related technical assistance is to assist communities in making the changes needed to bring their Continuum of Care into compliance with the Interim Rule. Because such compliance requires codification of the CoC's new structure and governance, because the regulations call for the participation of representatives from diverse constituencies, and because the reconstituted CoC will have significant responsibilities for ensuring the proper and best use of millions of dollars of HUD funding, the discussions about how to (re-)organize the CoC and how to (re-)allocate decision making authority are likely to be lively and, in some cases, contentious.

The framework set forth by the Interim Rule leaves room for considerable variation in structure and governance, as befits a program that includes CoCs as diverse as Los Angeles City/County; the City of Chicago; Lubbock, Texas; Racine County, West Virginia; the State of Rhode Island; and Miami/Dade County, Florida. The New York City CoC -- with its multitude of diverse stakeholders, broad staffing support, and 260+ projects receiving $110 million in annual CoC funding -- clearly requires a different structure and governance than, for example, the Eastern Arkansas CoC, which oversees one project receiving about $32,000 in annual funding.

The structure and governance-related issues facing a CoC consisting of a large metropolitan area will likely differ from the challenges facing a more rural CoC, or a CoC combining multiple smaller cities and towns, or a balance-of-state CoC encompassing a mix of urban, suburban, and rural communities. Likewise, the historical approach to structure and governance in a CoC with a large number of strong non-profit providers is likely to differ from the approach taken in CoCs with a single large provider or CoCs dominated by a jurisdiction.

The work of structure and governance-related TA consists of facilitating the conversations and decision making necessary to help a CoC develop and adopt a charter -- an organizational framework and a set of protocols that define how the organization functions -- which complies with the Interim Rule, and which is broadly acceptable to the constituencies and stakeholders that comprise the CoC.

Such TA is primarily facilitative, and not prescriptive. It helps explain and clarify the expectations underlying the Interim Rule, but allows the community to devise its own solutions to the challenge of balancing HUD's requirements with needs and preferences of local stakeholders.

As each such TA engagement is planned, it is important to define the goals and outcomes of that TA. Some CoCs will need only a little bit of interpretive guidance, and will be prepared to provide internal leadership and facilitation for the process of (re-)defining their structure and governance. In other CoCs, technical assistance will largely consist of facilitating access to information about the range of structure and governance models adopted by other, more experienced CoCs. In still other CoCs, the technical

assistance provider will be called upon to facilitate the large and small group discussions in which sometimes challenging differences get hammered out.

In some cases, the endpoint of structure and governance TA will be the delivery of one or more trainings about the requirements of the Interim Rule and sharing of information about how different CoCs have organized themselves. In other cases, the TA provider and client community will embrace a plan calling for the TA provider to support the CoC throughout its discussions and decision-making, to the point of adoption of a charter. While TA providers may well be asked to comment upon the provisions of a proposed charter, they should avoid taking on significant drafting responsibilities. (To use a sports analogy, the appropriate role of a HUD-funded TA provider is "coach" and not "player.")   In some CoCs, deciding upon the persons or entities that draft the charter will be easy; in some CoCs that decision will be highly charged; and in some smaller CoCs with little or no staffing, the question of who writes the charter will be less a matter of power and control, and more a matter of finding the person-power to get it done.

Because TA resources are finite, in at least some instances, the planned scope of work will be more limited than the assistance sought by the community. It is important for the TA provider to **clearly communicate any limitations** (to HUD and the community): which objectives, outcomes, questions, and/or issues it will be able to address, and which will require other sources of assistance.

Finally, although TA providers will, of course, come to their assignment with experience and opinions about how decisions should be made, how authority should be allocated, what it means to be inclusive and transparent, how to best ensure accountability, or even what model of structure and governance best suits a particular type of CoC, **any such biases must be subordinate to the preferences of the community, and to the CoC's process for eliciting and eventually codifying those preferences**.

It is particularly important that structure and governance TA -- and all HUD-funded TA -- receive accurate, impartial, and high quality information and support, regardless of the TA firm assigned to the community. This document, and the information gathering and discussions that informed its preparation, is an attempt to ensure that kind of consistent messaging and technical assistance.

Specifically, this document attempts to:
- Provide a brief overview of CoC governance and structure with links to additional relevant documents, including toolkits and guidance materials developed by HUD and its network of TA providers;
- Summarize background information and define key terms necessary for providing CoC governance and structure technical assistance;
- Suggest an overarching approach, including key questions to consider, when providing governance and structure TA;
- Provide examples of common models of CoC governance and structure, and discuss potential challenges associated with those models; and
- Provide case studies from technical assistance to so-called Priority Communities[1].

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[1] Priority Communities are large metropolitan areas with significant homeless populations, which have been targeted by HUD for technical assistance, in an attempt to facilitate accelerated progress in preventing and eliminating such homelessness. The structure and governance models that are in place in different kinds of CoCs -- rural CoCs, smaller urban CoCs, multi-

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Overview of the Continuum of Care

A Continuum of Care (CoC)[2] is a collaborative of stakeholders that plans for and implements a locally determined mix of emergency, transitional, and permanent housing and supportive services, including but not necessarily limited to outreach, engagement, and assessment, that is intended to prevent and address homelessness within a specified geography, using targeted HUD resources and other public and private funds, and operating within a framework established by the HEARTH Act and described in greater detail in HUD's Continuum of Care Interim Rule.

The structure and governance provisions in that CoC Interim Rule are intended to ensure that the process of planning for, implementing, and overseeing these housing and service interventions is collaborative, inclusive, transparent, measurable, and effective, and that CoC resources are allocated, targeted, and utilized in a way that is coordinated with and complements the efforts of jurisdictions encompassed in the CoC's geography, and that maximizes the use and impact of mainstream programs and resources.

Under the provisions of the CoC Interim Rule, CoCs have a broad range of responsibilities, including but not limited to the following activities[3]:

- Adopting, following, and annually updating a **governance charter**; establishing a **Board**; and appointing committees, subcommittees, and work groups, as needed.

- **Systems Coordination**: Coordinating a housing and service system -- including prevention strategies, outreach, engagement, and assessment, and shelter, housing and supportive services -- that meets the needs of homeless individuals and families within the CoC's geography. In particular, the CoC must work with ESG recipients that share its geography to develop a **coordinated or centralized assessment system** that provides an initial comprehensive assessment of the housing and service-related needs of individuals and families seeking CoC- and/or ESG-related assistance.

- **Point in Time Count**: Planning for and conducting, at least biennially, a point-in-time count of homeless persons within the geographic area

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jurisdictional CoCs, and Balance of State CoCs -- will not necessarily look like the structure and governance models in priority communities.

[2] This explanation is cobbled together from definitions and regulatory requirements contained in the Interim Rule. The reader -- and any TA provider charged with delivering structure and governance technical assistance -- is advised to refer to the Interim Rule for HUD's exact language.

[3] This listing summarizes some of the key requirements specified in the Interim Rule. The reader -- and any TA provider charged with delivering structure and governance technical assistance -- is advised to refer to the Interim Rule for HUD's exact enumeration of CoC responsibilities.

- **Annual Gaps Analysis**: Conducting an annual gaps analysis of the homeless needs and services available within the geographic area;

- **ESG Consultation**: Consulting with State and local government ESG recipients within the CoC's geographic area on the plan for allocating ESG funds and reporting on and evaluating the performance of ESG recipients and sub recipients.

- **Operate an HMIS**: Designate an HMIS Lead agency, and operate a Homeless Management Information System that meet HUD's data collection, quality, management, and reporting standards, as well as specified privacy and security standards.

- Prepare and submit **annual HUD application**: Prepare application for McKinney- Vento Homeless Assistance Act competitive grant, and working with grant recipients and subrecipients, establish and monitor progress with respect to performance and outcome targets, and take action against poor performers.

As noted above, HUD's Interim Rule also outlines a number of requirements with respect to the composition, structure, and governance of the Continuum of Care. This document is intended to support technical assistance providers in working with CoCs to ensure that their structure and governance is in compliance with HUD requirements, and appropriate to the needs and circumstances of the community(s) they serve. Additional program information and tools currently in development about CoC Governance and Structure are listed in the Tools section of this document and can be found on the OneCPD website.

Key Terms and Definitions[4]

The Interim Rule includes only a handful of definitions relative to the structure and governance of CoCs:

- The **CoC** is "the group organized to carry out" the aforementioned responsibilities of planning, implementing, and overseeing the housing and service interventions. A CoC may or may not be a legal entity. If it is a jurisdiction, a Housing Authority, or a non-profit, the CoC may designate itself as the "**Collaborative Applicant**," that is, the entity that coordinates the CoC's annual application for HUD Continuum of Care program funding. If a Collaborative Applicant can document certain additional competencies related to providing fiscal and project oversight, it may apply for designation by HUD as a "**Unified Funding Agency**."
- The "**Board**" of the CoC is the representative body that acts on behalf of the CoC

CoCs receiving technical assistance may currently use different terms to describe their primary decision-making group, or the lead agency, reflecting pre-HEARTH nomenclature. The TA provider should work with the CoC to clarify the roles and responsibilities of each such entity, to ensure that the overall structure and governance is in compliance with HUD requirements, and to facilitate any modifications to that structure and governance necessary to achieve such compliance.

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[4] As per prior notes, the reader -- and any TA provider charged with delivering structure and governance technical assistance -- is advised to refer to the Interim Rule for HUD's exact definitions.

Overarching Principles for Providing Technical Assistance for CoC Governance and Structure

While each CoC is unique, we have identified several overarching principles that can be applied to guide technical assistance work. These recommendations, therefore, do not provide a definition of the 'best' model of a CoC, but rather combine to offer "navigational assistance" to help you discover how a CoC works and provide guidance to ensure accountability and transparency.

- Avoid structure/governance labels that imply "good" or "bad" (e.g., strong, weak,)
- Avoid untested assumptions about how systems work (e.g., this type of structure inherently excludes stakeholders, this kind of governance suffers from frequent staff turnover, this kind of CoC puts provider interests ahead of community needs, etc.)
- Clarify CoC roles and responsibilities vis-à-vis meeting HUD-mandated requirements:
  - Does the CoC utilize different structures and governance mechanisms to address different types of responsibilities/requirements (e.g., decisions about how coordinated assessment will work vs. which projects will be renewed)
- Maintain a dual focus on
- (a) essential aspects of compliance with HUD structure and governance requirements, and
- (b) how actual (vs. on paper) structure and governance contribute to CoC's effectiveness in accomplishing homelessness-related mission
- Instead of focusing generically on "structure," focus on how key decisions are made (e.g., spending / project funding, provider selection, how coordinated intake/assessment/referrals will work, HMIS system, controversial policies, etc.)
  - Explore how accountability and transparency are ensured

Eight Key Questions

We offer the following questions to assist TA providers in identifying the issues and challenges that will shape or affect their structure and governance-related technical assistance:

1. Identify the relevant jurisdictions and their relationship to the CoC: state, balance of state, single county, single city, region with multiple counties or multiple cities or mix
2. Identify other entities that are active participants in the CoC (see list below). If there are missing constituencies, why are they missing?   (Possible reasons: non-existent in region, limited funding/interest, political tensions, etc.)

> **Examples of Entities Participating in CoC**
> - Governments and their instrumentalities (jurisdictional leaders, executive departments, police, emergency, courts, etc.)
> - Public Housing Agencies
> - Veterans and organizations assisting veterans
> - Mainstream resource agencies (e.g. Medicaid, SSI/SSA, etc.)
> - Victim services providers
> - Non-profits solely focused on homelessness (health, behavioral health, subpopulation-specific, housing, benefits, employment, etc.)
> - Non-profits targeting housing or services to both homeless and non-homeless persons
> - Businesses
> - Faith based organizations
> - School districts (and their McKinney Liaisons), institutions of higher education, adult education and training programs, etc.
> - Coalitions / Civic groups
> - Consumers
> - Advocates

3. Is the CoC a legal entity?
4. Is there a pre-existing structure and governance?   Are there written bylaws?
5. Is the CoC in compliance with structure, governance, and operational requirements (see list below)?

> **Examples of Compliance-Related Requirements**
> - Establishment of a representative board / missing constituencies?
> - Board selection process
> - Membership meetings
> - Committee structure
> - Governance charter
> - Establish performance targets for ESG and CoC projects and monitor/evaluate performance/ outcomes
> - Establish written standards
> - Designate HMIS / HMIS Lead
> - Develop CoC Strategic Plan
> - Prepare annual HUD application
> - CoC programmatic oversight (compliance)
> - CoC fiscal oversight (primarily UFAs)

6. How are the roles and responsibilities divided among the entities that make up the CoC?
   - In cases where roles and responsibilities are filled by paid staff, how are those positions funded?
   - Are there other entities that should be (more) involved?

Role/Responsibilities	Entity(s) Taking Lead	Entity(s) Taking Secondary Role	Responsible Staff (How Funded)	Who Else Should Be Involved? Who Should Be More Involved?
10 Year Plan / Strategic Plan Dev't.				
10 Year Plan / Strategic. Plan Oversight				
Needs Assessment				
HMIS Planning / Decisions				
HMIS Oversight				
CoC Grants Monitoring / Oversight				
ESG and CoC Program / System Performance Measurement / Eval.				
Priority setting / Funding decisions				
Policy development				
Fundraising / Annual HUD application				
Resource Mgmt/Allocation Decisions				
Collab. Applicant vs. Unified Funding Agency (level of fiscal oversight)				
P.I.T. Counts / Data Collection				

7. How is the CoC Performing?
   - Has the CoC been cited by HUD (or other funders) for programmatic non-compliance, fiscal non-compliance, delinquent reports, or other instances of non-performance
   - Do the CoC's Point-in-Time counts or AHAR data show increases in homelessness or chronic homelessness or veteran homelessness or unsheltered homelessness?
   - Do the data (or concerns from stakeholders) indicate a problem with discharges into homelessness by other systems of care?
   - Do Annual Performance Reports indicate failure to achieve targeted increases in the supply of permanent supportive housing (PSH), failure to achieve targeted stability in PSH, failure to achieve targeted housing placement rates from transitional housing, and /or failure to achieve target levels of participation in employment or mainstream benefits? Are these isolated or ongoing problems?
   - Do the data (e.g., from e-HIC, AHAR, HMIS APRs, etc.) indicate HMIS data quality problems or non-participation by key providers?
   - (once these statistics become available from the HMIS), Do HEARTH performance metrics indicate high or increasing durations of average homelessness, a high or increasing rate of recidivism, and/or a high or increasing incidence of new homelessness?

- Does the relevant Consolidated Plan and/or documentation of leveraged resources indicate that the CoC is effectively using available resources?
- Do stakeholder responses in the CoC Check-Up evidence different levels of awareness of CoC policies and procedures; different perceptions about the strengths, weaknesses, and effectiveness of the current structure and governance; and/or problematic patterns of communication between stakeholders and key CoC decision makers

8. How could a different / improved structure and/or governance strengthen outcomes and/or address compliance or performance issues?
   - Diagram existing structure and governance
   - Compare paper to reality
   - Evaluate alternate strategies in terms of how they would foster improved compliance or performance, and in terms of their viability and sustainability, given the political, economic, and environmental realities of the geography served by the CoC?

Examples of CoC Governance and Structure Models

At a CoC Peer Sharing Roundtable in May 2012, representatives from 13 participating (large metropolitan area) CoC's submitted information about their structure and governance and self-identified some of the associated strengths and challenges, and goals for the future. While each CoC's structure and governance was uniquely influenced by the specific needs of the community, several common themes emerged, including a desire for increased transparency, stronger accountability, and broader CoC membership.

Drawing from the discussions at that Roundtable, and from the experience of the TA providers who helped prepare this framework, we have compiled some examples of common CoC governance and structure models that you may see in the community, and key questions to guide your technical assistance. This taxonomy is not meant to be inclusive of all CoCs, and the list of issues associated with each listed model may not be relevant to a given CoC; instead, these examples are intended to be illustrative of the kinds of questions that may be worth asking, and the kinds of assistance or clarification that may be helpful.

(a) Strong Primary Decision Making Group, Clearly Defined Lead Agency

In this model, the Primary decision making group has strong representation from various key stakeholders, including government, housing authority, service providers and consumers, and serves as the CoC's brain trust to develop well thought-out policy and recommendations. The primary decision making group varies in size from 10-30+ members, and has an extensive sub-committee structure. In this model the Lead Agency has a very structured and clearly defined role and responsibility for handling the administrative aspects of the CoC. It is responsible for organizing, but not necessarily leading, the planning process in the primary decision making group and sub-committees. It can be a 501(c)(3) or a unit of government. Depending upon how it is implemented, one of the strengths of this model may be equal representation among government, service providers and consumers, or at least the assurance that all voices are represented.

CoCs using this model often have strong chairs from the community, who lead subcommittees. Some challenges that may arise in CoC using this model are: (i) the potential for conflict of interest between service providers competing for funds and participating on the primary decision making group; investment by the provider community in the status quo making it difficult to promote systems change.

Questions to Consider

1. How can the lead agency and primary decision making group work together to make quick decisions? How do they work together? Is one seen as the 'key' decision maker in the CoC?
2. Is there an individual or leadership team that has ultimately accountability for ensuring that decisions are made? Would a chair or executive subcommittee help facilitate progress on difficult decisions? Is one form of leadership preferable to the other, in terms of preserving broad representation?
3. Is there a clear conflict of interest policy in place?

Examples: Chicago, Houston (post 2012), Columbus, Phoenix

(b) Strong Board of Lead Agency Represents the Primary Decision Making Group

In this model, the primary decision making group is the board of the lead agency, and the lead agency is an organization whose organizational members include government entities and non-profits providing housing and services in the geography, and whose individual members include consumers and other interested community members. To the extent that the primary decision-making group is dominated by service providers, the CoC may face the same kind of resistance to system change as other decision making bodies dominated by entities with a financial interest in the status quo. Similarly, to the extent that the decision making group is dominated by insiders, it may be less open to community suggestions about alternative approaches. Unless the lead agency and its board are accustomed to opening up their meetings and communication to the broader membership and interested public, persons and organizations not represented on the boar may perceive a lack of transparency in the decision making process. To the extent that non-profit members of the lead agency and the lead agency itself have the need to raise funds, this model may create conflicts of interest or may pose fundraising challenges for less well-established agencies. On the plus side, this model has the potential for inspiring a high level of provider engagement, focusing community efforts, and bringing important expertise to the board.

Questions to Consider
1. How diverse is the board? What types of organizations and individuals are members of the board? Are some important constituencies missing? Do all constituencies participate in decision making? If diversity of membership or participation in decision making is lacking, what steps can be taken to increase that diversity?
2. How does the board ensure that decisions and policies are accessible and transparent to service providers who are not on the board?
3. What types of subcommittees participate in this process? How is their work integrated into the larger primary decision-making group?

Examples: Detroit, Denver, Birmingham

(c) <u>Strong Lead Agency, less-defined Primary Decision Making Group</u>

In this model, staff from the lead agency often chair of the primary decision making group and key subcommittees. The primary decision making group may be an ad hoc group of stakeholders, which may or may not fully represent all or most of the CoC's constituencies. If the focus of decision making is on periodic applications for HUD funding, there may be little representation from entities that are not operating, or seeking to operate, HUD-funded projects. In this type of model, the lead agency may exercise a disproportionate role in decision making, in some cases without even consulting the primary decision making group and subcommittees. If the decision making group and subcommittees are relegated to a secondary role, members are less likely to be invested, more likely to turn over, and less likely to be aware of current issues. To the extent that the CoC experiences problems, the lead agency in this model may find itself scapegoated by stakeholders who feel excluded from CoC governance, making collaborative problem solving more difficult. On the one hand, TA providers may find such CoCs easy to work with because a strong lead agency is usually able to complete any administrative requirements, and because the key parties are obvious. On the other hand, TA providers may find it difficult to provide technical assistance that involves engaging a broader range of stakeholders than the lead agency is used to sharing responsibilities with.

<u>Questions to Consider</u>

1. How do the primary decision making group and lead agency work together to make decisions? Are there ways to improve this process?
2. How can the CoC ensure a diverse membership of active participants in the primary decision making group?
3. How does the CoC institutionalize knowledge and activities despite high turnover among participants or lead agency staff?

<u>Examples</u>: Indiana Balance of State, Baltimore, Boston

(d) <u>Multi- Jurisdictional CoC</u>

In this model, covered jurisdictions may overlap (e.g., county plus leading city in that county) or may be contiguous (e.g., neighboring counties or cities), or the CoC may be a mix of incorporated and unincorporated jurisdictions operating as a balance of state CoC. The primary decision making group may include representation from some or all of the covered jurisdictions; elected officials and civil servants from the various jurisdictions may have differing commitments to the mission of the CoC, and different levels of investment in its work. Often, such CoCs are formed to allow jurisdictions with limited ability to manage HUD grant funding to combine their administrative resources to leverage the larger combined amount of pro-rata need. Such CoCs may even have been formed out of a lawsuit or regional compromise, with representatives selected by city/ state officials; in such cases, of course, homelessness and the resources allocated to address it, may be a very politicized issue. The multi-jurisdictional model thus encompasses a broad range of CoCs, and TA providers should attempt to understand the nature and history of the arrangement before diving into questions of reorganization.

The lead agency of a multi-jurisdictional CoC may be a unit of city or county government, or a consortium that is not a legal entity, or may be a nonprofit that provides services in the covered jurisdictions. Potential strengths of this model are its regional approach to addressing homelessness and encouragement of jurisdictional cooperation. Potential weaknesses may include uneven levels of participation and interest from different jurisdictions, causing political resentment from more involved jurisdictions; contentiousness arising from the uneven distribution of resources; and/or difficulty in establishing a clear line of accountability.

Questions to Consider

1. Who is involved in submitting the NOFA plan? How do all the jurisdictions work together in this process?
2. Is there a ten year plan to end homelessness? How does this impact the CoC decision making/ priority areas?
3. How can the CoC ensure accountability among multiple jurisdictions?

Examples: Various multi-county CoCs in California and Illinois, Los Angeles City/County (CA), Fresno/Madera County (CA), Atlanta/Roswell/DeKalb/Fulton Counties (GA), Worcester City/County (MA)

(e) CoCs with Ad Hoc/No Formal Structure/Governance

In this model, there is no official CoC structure, but rather an ad hoc group of providers from the community. The primary decision making group is often a group of providers and there is no system planning in place. Decision making primarily consists of voting to renewing of current projects and deciding what new projects to seek. In some CoCs using this model, the role of lead agency may rotate among key providers, who share in the responsibility of completing the required administrative tasks of the CoC, or who share the cost of a consultant or other staffperson that takes care of those tasks.

CoCs lacking a formal structure are clearly unable to meet the current HEARTH requirements for structure and governance. They may likewise be unable to fulfill many of the responsibilities assigned to CoCs, including conducting performance evaluation or developing a coordinated or centralized intake/assessment system.

In the absence of a formal structure, it is important for the TA provider to ascertain which stakeholders have been participating in the planning process for submitting NOFA applications, which jurisdictions have signed off as to consistency with the consolidated plan, why no additional structure/governance has been developed, and whether the lack of a formal structure and governance mechanism is indicative of an overall lack of planning..

Questions to Consider

1. Is the CoC a legal entity? (Probably not if there is no formal structure/governance)

2. What are the reasons for lack of a formal structure and governance process?   Some possible reasons might include:

- homelessness is not a high priority issue,
- jurisdictional involvement is minimal,
- CoC lacks geographic or political cohesion,
- CoC is not eligible for significant additional funding,
- Resources are unavailable to staff any permanent structure/function,
- CoC providers protect self-interest by keeping processes informal,

3. How could a formal structure and governance strengthen outcomes and address compliance or performance issues?

4. Is formalizing a structure and governance a better approach than exploring a merger with another existing CoC?

Examples: Various smaller CoC's

Tools

CoC Peer Sharing Roundtable Responses : This document contains responses from 13 different CoC's about structure and governance issues. It provides an overview of 13 sites governance and structure and lists benefits and challenges for each site.

CoC Peer Sharing Governance and Structure Table : This document summarizes information from the CoC Peer Sharing Roundtable responses in table form.

Sample MOU New York City : This is the MOU between the city of New York and the Continuum of Care.

Tampa/ Hillsborough County CoC Governance and Structure Intro : This is a PowerPoint presentation given to the Tampa/ Hillsborough CoC. It includes an overview of CoC regulations and examples from Chicago and Seattle.

Sample CoC Recruitment Letter : This document is a recruitment letter for the Tampa CoC, The Solutions Group.

Houston/Harris County Continuum of Care Charter : This is a draft charter from the Houston/ Harris County CoC.

How to Participate in CoC Kick Off : This document provides tips and guidelines on how to participate on a CoC Kick off call for the Houston CoC.

Houston CoC Community Forum Presentation : This is a PowerPoint that was presented to the Houston CoC and stakeholders and facilitated a discussion about the roles and goals of the CoC.

Background: In 2011 the Tampa / Hillsborough County CoC was selected to participate in the joint USICH / HUD Priority Community initiative. In their CoC check up, as well as during the initial assessment, it became evident that Tampa lacked a transparent and effective governance and structure and it was made a focus of the engagement.

The structure that existed in Tampa when the TA engagement started would best be described as "Strong Board of Lead Agency Represents the Primary Decision Making Group". The lead agencies board of directors has veto power over all issues in the community, and felt this was required to implement key system change measure. This board of directors was comprised of various key stakeholders in the community, but those selected were not always reflective of the broader community. This lack of representation left many in the community disengaged in the process, and often blamed the lead agency for the lack of progress on ending homelessness. Also, the boards focus on CoC related activates left it missing individuals who could help with fundraising for the lead agency, as well as effectively manage the administrative burden it faced.

Technical Assistance Approach: The primary objectives with Tampa were to 1) develop a HEARTH compliant G&S Model, 2) Increase transparency, and participation by all stakeholders, 3) realign the roles and responsibilities of managing the Continuum of Care. The first step was to develop a new structure for how the CoC was organized. Given the limited capacity of the lead agency due to funding issues, the TA providers attempted to broaden the responsibilities within the community. A two-pager on their proposed structure can be found here.

To implement this proposed structure the TA providers held an All Continuum of Care meeting with relevant and concerned stakeholders. At the meeting, this PowerPoint was presented that explained why Tampa needs to update their structure, provided examples from other communities, and attempted to solicit their feedback in the process. To do this the room was split into four groups. Each group was given the required activities (from the HUD regs) of a CoC, as well as blank sheets for additional activities the CoC should conduct. A facilitated discussion between the four groups was held to come up with one set of recommendations.

These recommendations were process and presented to other stakeholders (business leaders, community activities, etc.) who couldn't participate in the broader process. As the NOFA blackout was approaching last November, this guidance document was developed to help the community being to implement this new structure.

CoC Program Product Development Update
12-5-12

Products Completed and Posted

1. [Continuum of Care (CoC) Program Interim Rule (formatted version)](#)
2. [Introductory Guide to the Continuum of Care (CoC) Program](#)
3. [Programmatic Crosswalk of Changes: Continuum of Care (CoC) Program, Supportive Housing Program (SHP), and Shelter Plus Care (SPC) Program Regulations](#)
4. [Leasing and Rental Assistance Tool: Transition Guidance for Existing SHP Grantees Using Leasing Funds for Transitional or Permanent Housing](#)
5. [CoC Program Funding for HMIS](#)
6. [CoC Program Help Desk](#)
7. [Frequently Asked Questions (FAQs)](#)
8. Establishing and Operating a Continuum of Care and FAQs): http://www.hudhre.info/index.cfm?do=viewResource&ResourceId=4714
9. CoC Governance Crosswalk of Changes: Continuum of Care (CoC) Program, Supportive Housing Program (SHP), and Shelter Plus Care (S+C) Program Regulations: http://www.hudhre.info/index.cfm?do=viewResource&ResourceId=4715
10. Special Guidance for Renewal Safe Havens: http://www.hudhre.info/index.cfm?do=viewResource&ResourceId=4716

Products In Final Review:

11. Rapid Re-Housing: ESG vs. CoC

Products Currently With HUD:

12. Retooling Transitional Housing: Reallocating or Repurposing Funds
13. CoC Program Components and Eligible Costs User Guide, webinar, and FAQs
14. Project Administration and General Program Requirements User Guide webinar, and FAQs
15. Programmatic Crosswalk: CoC Board and Governance
16. Program Requirements Crosswalk of Changes
17. Continuum of Care Guide to Collaboration with Emergency Solutions Grants Program Recipients
18. Fact Sheet: Site Control and Environmental Review
19. Matching Requirements Toolkit
20. Fact Sheet: Housing Standards
21. Grant Administration User Guide, webinar, and FAQs
22. Financial Management Toolkit
23. CoC Guide to Coordination with Emergency Solutions Grants Program Recipients
24. CoC Board Toolkit (to be submitted to HUD in coming days)

Products in Development

- CoC Program Components and Eligible Costs Training Curriculum
- Establishing and Operating a CoC Training Curriculum
- Project Administration and General Program Requirements Training Curriculum
- Introduction to UFA Fundamentals User Guide and FAQs
- Self Assessment for UFAs