

Continuum of Care Governance

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What is a Continuum of Care?

- Local planning body responsible for coordinating the full range of homeless services in a specific geographic area.
- Body includes stakeholders engaged in addressing homelessness
- Roughly 390 CoCs in the Country
 - Some cover 1 city and others cover an entire state



Other Uses of the Term “Continuum of Care”

While the term “Continuum of Care” or “CoC” has a specific meaning in the homeless response context it gets used in other ways too:

- CoC Governing Board
- Collaborative Applicant
- Geographic Area
- CoC Program



Image Source: <https://ktla.com/news/california/california-unveils-homelessness-database-aimed-at-helping-policy-makers-better-address-issues/>

CoC Responsibilities: Overview



Image Source: <https://eventadvisorygroup.com/event-analysis-planning/>.

- CoCs have 3 core areas of responsibility
 1. Operate the CoC
 2. Designate and operate the HMIS
 3. CoC planning
- CoCs have flexibility to determine who in the CoC will fulfill these responsibilities

Responsibilities of Different “CoC” Entities

Continuum of Care

Ensures all of the CoC responsibilities per 24 CFR 578.7 are fulfilled
– this is generally outlined in the CoC Governance Charter

CoC Board

Be representative (with at least someone who is currently or formerly homeless)

Collaborative Applicant

Complete the CoC Program Consolidated Application
Apply for CoC Planning funds

CoC Governance Structures

- CoC governance structures vary by need – there is a range from centralized to decentralized
- The larger the CoC more likely it is to have regional hubs
- The CoC can decide how much authority to designate to regions
- CoCs often have to balance administrative and policy roles – sometimes that rests with the CoC Board, Collaborative Applicant, or other local partner

Decentralized CoCs: What Does the Collaborative Applicant Do

- Many Balance of State CoCs empower regions to make local decisions but leave defined responsibilities with the Collaborative Applicant like
 - Establishing written standards
 - Developing a standardized coordinated entry assessment tool
 - Administering HMIS
 - Coordinating with partners that cross boundaries (e.g., state entities)
 - Managing and monitoring the homeless assistance portfolio
 - Coordinate meetings as required by 24 CFR 578.7



Image source: <https://www.vxchnge.com/blog/centralized-decentralized-network>

CoC Split: What Must Happen



Image Source: <https://www.findlaw.com/family/divorce/do-i-have-to-go-to-court-for-an-uncontested-divorce.html>

- 1. Vote by New CoC**
A vote of the entire CoC (all of the stakeholders)
- 2. Notification to the Existing CoC**
- 3. Governance Charter**
Must demonstrate compliance with 24 CFR 578.7 requirements
- 4. Operational HMIS**
Must run system performance measures for the new CoC
- 5. Evidence of Coordinated Entry Effort**
Must show CES is in development and the CoC has an entity responsible to ensure it will be operating in the CoC

Resources

- [CoC Program Interim Rule \(24 CFR 578\)](#)
- [CoC Program Toolkit - CoC Responsibilities and Duties](#)
- Technical Assistance

Questions?

CoC Responsibilities: Operate the CoC

- Hold regular meetings
- Invite new members
- Adopt a process to select the CoC Board
- Appoint committees
- Develop, follow, and regularly update a governance charter
- Monitor performance of recipient and subrecipients
- Establish performance targets and regularly evaluate them
- Establish and operate a coordinated entry system (CES)
- Develop written standards for providing CoC assistance

CoC Responsibilities: Designate and Operate HMIS

- Designate a Homeless Management Information System (HMIS) for the CoC
- Designate an HMIS Lead
- Develop and maintain, as a minimum, the following plans
 - Privacy
 - Security
 - Data quality
- Ensure consistent HMIS participation
- Ensure HMIS is in compliance with HUD requirements

CoC Responsibilities: CoC Planning

- Coordinate the implementation of a comprehensive homeless response system that has
 - Outreach, engagement, assessment
 - Shelter, housing, and services
 - Prevention strategies
- Conduct a Point-in-Time (PIT) count at least every other year
- Conduct an annual gaps analysis
- Provided required information to complete the Consolidated Plan
- Consult with ESG recipients on ESG allocations and evaluating performance