



Continuum of Care Duties: Establishing and Operating a Continuum of Care



U.S. Department of Housing and Urban Development

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Welcome to the HUD Broadcast on the Continuum of Care duties in establishing and operating a Continuum of Care. This presentation will provide information about how to establish and operate a Continuum of Care.

Today's Broadcast will cover...

- Purpose of Continuum of Care (CoC) Program
- CoC Organizational Structure
- CoC Governance Responsibilities



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We will start today's broadcast with an overview of the purpose of the CoC Program and the core requirement in the CoC Program interim rule to establish a Continuum of Care, or CoC. We will also discuss the various entities that are likely to work with the CoC to achieve its goals and responsibilities.

Then we will review the organizational structure of a CoC, including an overview of the relationship between the CoC Board, HMIS Lead, and Collaborative Applicant.

Finally, we will detail the governance-related responsibilities required of the CoC in the CoC Program regulations, so listeners can clearly understand what will be expected of them.

Establishing a CoC

To meet the goals of the CoC Program, the interim rule requires communities to establish a CoC.

The CoC must meet minimum requirements for structure and governance.



The CoC Program is designed to:

- Promote a community-wide commitment to the goal of ending homelessness;
- Provide funding for efforts to quickly re-house individuals and families who are homeless, which minimizes the trauma and dislocation caused by homelessness;
- Promote access to and effective use of mainstream programs;
- Optimize self-sufficiency among individuals and families experiencing homelessness.

Recognizing that the community will need to be fully engaged in order to achieve the intended purpose of the CoC Program, the interim rule requires communities to establish a Continuum of Care in order to receive CoC Program funding.

CoC Defined

At its simplest, a Continuum of Care is established by ***representatives of relevant organizations*** within a ***geographic area*** to ***carry out the responsibilities*** set forth in the CoC Program interim rule.



A CoC is expected to address homelessness through a coordinated community-based process of identifying needs and building a system of housing and services that meet those needs.

The CoC Program interim rule formalizes the role of the Continuum of Care as the planning body responsible for meeting the goals of ending and preventing homelessness.

In some communities, very little will have to change about the CoC's structure and operations in order to be in compliance with the requirements of the CoC Program interim rule. In other communities, more structure and formalization will need to be implemented to be in compliance with the program requirements.

CoC Membership

Membership should ensure:

- Community-wide commitment to ending and preventing homelessness
- Representation of the relevant organizations within the entire geographic area served by the CoC



Each CoC is expected to be tailored to its unique community circumstances, to the extent possible involving all of the players required to further local efforts to end homelessness. The purpose for including stakeholder representation from a wide range of organizations within the CoC's geographic area is to ensure that all community stakeholders participate in developing and implementing a range of housing and services.

Continuums are expected to include representation to the extent that the type of organization exists within the geographic area that the Continuum represents and is available to participate in the Continuum. For example, if a CoC did not have a university within its geographic boundaries, then HUD would not expect the Continuum to have representation from a university within the Continuum.

CoC Membership Examples

- Nonprofit homeless assistance providers
- Victim services providers
- Faith-based organizations
- Governments
- Businesses
- Advocates
- Public housing agencies
- School districts



Note that the CoC is intended to be a large, representative group. It is generally envisioned as a network or coalition of existing organizations, entities and individuals. The next slide provides examples.

CoC Membership Examples

- Social service providers
- Mental health agencies
- Hospitals
- Universities
- Affordable housing developers
- Law enforcement
- Organizations that serve veterans who are homeless and formerly homeless
- Persons who are homeless and formerly homeless



Here are additional examples of the groups, entities and individuals who participate in a CoC. In some communities, the CoC is the main organizing body, whereas in other communities, it is a part of a larger coordinating body for mainstream services.

CoC Organizational Structure

Continuum of Care

**HMIS
Lead**

Board

**Collaborative
Applicant**



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The CoC is ultimately responsible for all duties assigned in the CoC Program interim rule.

Two activities - compiling and submitting the CoC application and operating the HMIS - must be done by eligible applicants; therefore, the CoC must designate eligible applicants to serve these functions.

The CoC may formally assign some of its responsibilities to other entities, such as a CoC board or committees, if desired. It is ultimately up to the CoC to determine how it would like to function, but as we will discuss later in this broadcast, all of the assignments need to be documented in writing.

CoC Board

- Must be established by CoC to act on its behalf
- What the CoC means by “on its behalf” must be specified in the CoC governance charter
- ***NOT the same as a CoC Collaborative Applicant***



The CoC Program interim rule requires every CoC to establish a board to act on behalf of the Continuum. The board will be a subset of the membership that is established in accordance with the CoC regulations governing board composition and board selection.

The CoC assigns the Board responsibilities in a written agreement called a Governance Charter. We will talk more about that later, but please understand that the board does not have an explicit role unless specified in the governance charter. Without assigning a duty to the Board, responsibilities are retained by the CoC.

A CoC board might look and act like an Advisory or Oversight Committee of the CoC coalition or network.

CoC Board Requirements

- Must represent relevant organizations and projects serving homeless subpopulations
- Must include at least one person who is homeless or formerly homeless
- One board member may represent the interests of more than one homeless subpopulation



The CoC Program interim rule requires CoC Boards to include representatives from relevant organizations and projects serving homeless subpopulations, such as persons with substance use and/or mental health disorders; persons with HIV/AIDS; veterans; people who are chronically homeless; families with children; unaccompanied youth; and victims of domestic violence, dating violence, sexual assault, and stalking.

The board must also include at least one individual who is homeless or formerly homeless.

Please note that HUD does not specify a length of homelessness for the individual who is homeless and/or formerly homeless on the board.



CoC Operating Requirements



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There are nine separate and distinct CoC operating responsibilities required by the CoC Program interim rule. Together, these operating responsibilities put significant emphasis on ensuring a broad, inclusive, transparent process.

This Broadcast will discuss the first five, which are related to CoC governance and structure.

CoC Operating Requirements

- Hold semiannual meetings with published agendas of the full membership
- Invite new members at least annually
- Appoint additional committees
- Adopt and follow a written board selection process
- Develop a governance charter



The first three responsibilities of the Continuum are basic responsibilities around the functioning of the CoC itself. These include:

- Holding at least semiannual meetings of the full membership of the CoC with formal, published agendas.
- Ensuring that new members are invited to the CoC annually through a publicly available invitation – such as in newspapers with general circulation in the area, through announcement to local boards and commissions, and in other publicly accessible ways.
- Appointing committees, subcommittees, or workgroups to carry out the tasks of the continuum.

Membership

- Semiannual meetings of full membership
 - Meetings must have published agendas
- Public, annual invitation to recruit new members
- Additional committees, subcommittees, or workgroups

Examples:

- Application review
- Point in Time count
- Coordinated assessment



These committees are not specified in the regulation, but some examples may include:

- Application Review committee to manage the annual HUD application process and recommend the final application to the CoC for approval;
- Point-in-Time Count committee to oversee the annual PIT and Housing Inventory Count;
- Committee to develop and implement appropriate policies, procedures, and standards of service for the continuum's coordinated assessment;
- HMIS committee to review plans, policies and procedures for recommendation to the CoC and oversee their implementation;
- Performance Measurement committee to develop and update system- and project-level targets and review evaluation results.

Board Selection Process

- Establish written process to select a board to act on behalf of the Continuum of Care
 - Selection process must be reviewed, updated, and approved by CoC at least once every 5 years
- Establish code of conduct, conflict of interest, and recusal process for Board



The fourth requirement is for the Continuum to adopt and follow a board selection process, which must be transparently described in writing and establish a process that will ensure the Board is appropriately representative of the Continuum, as required and discussed earlier. The written process must be reviewed, updated, and approved by the CoC at least once every 5 years.

The CoC Board must also establish a code of conduct and recusal process for individual members and comply with the conflict of interest requirements at § 578.95(b). These conflict of interest requirements include conflicts in regards to issues such as procurement of goods or services, funding decisions, provision of assistance, and others.

CoC Governance Charter

CoC must develop and follow a governance charter that details the functions of:

- CoC board
- CoC's committee structure and roles
- HMIS lead
- Staff roles
- Process for amending the charter

Some CoCs may already have bylaws that are similar to a governance charter.



The fifth requirement is to establish a governance charter in consultation with the collaborative applicant and the HMIS lead. The governance charter should outline all the roles and responsibilities assigned by the CoC to the Board or to any committees, subcommittees or workgroups and the process for reviewing and amending the charter.

Some CoCs have existing CoC bylaws which may or may not meet these requirements depending on how comprehensive they are. Bylaws may serve as a basis for developing a Governance Charter.

CoC Governance Charter

Governance charter must include:

- Policies and procedures to carry out CoC responsibilities
- Code of conduct
- Recusal process for board members

Governance charter must be:

- Reviewed and updated annually
- Developed in consultation with the Collaborative Applicant and HMIS lead



The governance charter must be updated annually and must encompass:

- Procedures and policies addressing the establishment and operation of the CoC;
- Procedures and policies regarding designating the HMIS Lead and HMIS Lead requirements;
- Code of conduct for the board; and
- Recusal process for the board, its chair, and any person acting on behalf of the board.

It is important to note that this charter is specific to the CoC board and is not the same as a recipient's or subrecipient's "Code of Conduct".

Transition Compliance Period

- CoC must comply with the board requirement by August 30, 2014
- If board already meets requirements, CoC must have reviewed and approved its written process for selecting the board within last 5 years



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The CoC must comply with the requirements related to establishing the board and its composition by August 30, 2014, two years from the effective date of the CoC Program interim rule. All other parts of the interim rule went into effect on August 30, 2012.

It is possible that, in some communities, a board already meets the described requirements. In that case, the CoC needs to ensure that it has reviewed and approved the written process for selecting the board in the last five years and followed that process when selecting the current board.

The date of the approval of the entire written process should be documented in meeting minutes or other CoC documentation. The board can be elected, appointed, or some combination – it is important that the process be transparent and approved.



How to ask questions to HUD

You can obtain additional information or assistance by going to [OneCPD Resource Exchange](#) and searching the [Resource Library](#), checking out [Training & Events and News](#), using [Ask a Question](#) or [requesting technical assistance](#)



Thank you for joining us for this broadcast on the CoC's responsibilities in establishing and operating a Continuum of Care. This broadcast provided an overview of the purpose of a CoC, identified the core requirements to establish a Continuum of Care, and outlined the various entities likely to work with the CoC to achieve its goals and responsibilities. We also reviewed the CoC organizational structure, including an overview of the relationship between the CoC Board, HMIS Lead, and Collaborative Applicant. Finally, we discussed the governance-related responsibilities required of the CoC in the CoC Program regulations.

Please refer to the related training materials on the CoC's responsibilities in establishing and operating a Continuum of Care that are provided on the OneCPD Resource Exchange. In the event that you have a specific question, please contact your Field Office or submit a question to the Ask-a-question section of www.oneCPD.info



Thank you.

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