CoC Responsibilities
2-Part Training Series

Recording Links

Below are the links to access the recordings of the 2-part training series.

Recordings of Trainings
Part I, June 9 at 7:00am PT/10:00am ET:
https://abtassociates.webex.com/abtassociates/ldr.php?RCID=1bc3162ec145a9d7ac6b838a613158a5
Part I, June 9 at 12:30pm PT/3:30pm ET:
https://abtassociates.webex.com/abtassociates/ldr.php?RCID=beb5b0801243d301d3c4e3b3df046f85
Part II, June 15 at 12:30pm PT/3:30pm ET:
https://abtassociates.webex.com/abtassociates/ldr.php?RCID=1fb6dec62b35c5920b1120b0d6aa33c6
Part II, June 16 at 7:00am PT/10:00am ET:
https://abtassociates.webex.com/abtassociates/ldr.php?RCID=52401361edd2b4c81614c5fd21f0f965

Questions and Answers

Below is a list of questions (and answers) that came out of the 2-part training series. If you have other questions, please feel free to reach out to your Regional Team Point of Contact or submit a question through the Ask A Question (AAQ) on the HUD Exchange: https://www.hudexchange.info/program-support/my-question/.

Question	Answer
Is Law Enforcement involvement in CoC membership a HUD requirement?	It is not a requirement: law enforcement is listed as an example of a type of stakeholder to include. It makes sense as a community to determine how best to include law enforcement as a CoC member (and if they should have any access to HMIS).
Are the groups mentioned in the CoC Program Interim Rule suggested or mandatory to be part of the CoC membership?	The groups are all suggested – different communities have different groups who participate based on their unique community structure.
Why is it called the CoC Program "Interim Rule"?	"An interim rule may be issued when it is in the public interest to promulgate an effective rule while keeping

	the rule-making open for further refinement." (i.e. HUD wants to "test drive" the rule for a while before finalizing. Once a rule is final, there are much more intensive requirements to make any amendments.)
How do you get faith-based organizations involved since they do not receive federal funding?	Work to provide value outside of direct funding to bring non-funded providers, including faith-based providers, into the fold. Show the mutual benefit of a relationship with them – how can you help them as much as they can assist you (may have to give more than take in the beginning). Make sure they feel important and valued – acknowledged for what they do for the community.
Would housing providers attend CoC membership meetings?	Housing providers are a critical component (but not the only component) of your CoC membership and should be included in the CoC membership meetings.
What are some different ways in which "public invitation" for CoC membership can be done?	There are some differences for public invitation processes if the CoC is run out of a government entity because then public meeting laws apply. Most communities publish their meeting information on a website and send information about upcoming meetings to a broad distribution list. It's a good idea to conduct targeted outreach if there are gaps in your community participation.
Is there any HUD requirement for CoC Board seats to all have an assigned representative or can a majority of seats be at-large, with priorities of how to fill those seats?	The only required CoC Board member is to have at least one seat with a person with lived experience of homelessness. Remember that CoC membership should probably be much broader and open for membership than the CoC Board that would have designated seats.
How is "membership" defined (for the purposes of the Continuum of Care)?	It is up to each CoC to determine how membership is defined, what role(s) members fill, and how an individual or organization becomes a member.
Are there examples of Conflicts of Interest/Recusal guidelines?	Yes – please reach out to your Regional Team Point of Contact and they can provide resources and help you develop a policy.

Should Conflict of Interest be reviewed regularly to ensure there are no issues when voting?	Reviewing the Conflict of Interest policy/process should be done on a regular basis, not necessarily prior to every vote, but often enough to ensure that the policy aligns with decision-making structures and the people involved in those (i.e. biannually, annually, in alignment with a review of other CoC governance documents)
Do people with lived experience of homelessness who use services involved in a funding conversation count as conflicted?	No, people with lived experience receiving housing or services from CoC-funded agencies do not have a conflict of interest the same way that employees or non-profit board members do.
When you say a CoC is in charge of reallocation, is that the full CoC Membership or the CoC Board? Or is it another group?	This should be determined at the local level and defined in the CoC's governance structure and processes – it could be any or all of these entities, or a different group of the CoC, as long as that is written into governance and there are no conflicts of interest.
For reallocation, how should a CoC respond to having no new or existing subrecipient that wants to take on a new project, or expand an existing project?	There may not be an immediate solution to this issue. CoCs often need to work over time to identify and work with stakeholders willing to build capacity to take on new or expanded activities funded through the CoC NOFO.
Any recommendations or suggestions on creating an appeals process during the Rank and Review process?	Community example: We allow appeals if the applicant believes they were harmed by a miscalculation on the part of the Rank and Review Committee, a violation of the established CoC or HUD Policy, or a violation of the CoC Program Competition guidelines. Disagreement with the results of a decision that followed appropriate processes is not a valid appeal. Our appeal committee includes 2 entirely unrelated people +1 member of the Rank and Review Committee to make the decision.
What responsibilities do Collaborative Applicants have in assisting agencies new to HUD funding in standing up CoC Program funded new projects?	How this process works, and which entities are responsible for this, should be defined at the local level and documented in CoC governance.

Does the CoC Governance Charter dictate the specific roles and responsibilities of the Collaborative Applicant?	Yes, especially if your CoC designates additional responsibilities for the Collaborative Applicant beyond the few that are required by HUD in the CoC Program Interim Rule so there is clarity around who is responsible for what.
Does Coordinated Entry assist with the paperwork for the client or is it simply sending a name to the program intake staff and they are the ones to do the coordination with the client?	How this process works should be defined locally. It's helpful to keep in mind that Coordinated Entry is intended to be a staffed process with the goal of helping people exit homelessness, through a variety of pathways, rather than solely focused on creating lists.
Would the Coordinated Entry System or team assess all those who are experiencing homelessness with a separate list for those who meet chronic homeless status or only assess those who meet chronic homeless status?	This should be defined locally, but Coordinated Entry is a system through which people experiencing or at risk of homelessness can access the crisis response system in a streamlined way, have their strengths and needs quickly assessed, and quickly connect to appropriate, tailored housing and mainstream services within the community. The most intensive interventions are prioritized for those with the highest needs.
How does the HUD Notice on the order of serving chronically homeless households in PSH intersect with CE?	Part of Coordinated Entry is developing a protocol for prioritizing people experiencing homelessness for the housing and related resources your community has available. That prioritization should be based on vulnerability and severity of need, ensuring that folks who are the most vulnerable are connected to housing and other resources as quickly as possible. Each community has flexibility to design their prioritization protocol or scheme to be responsive to the needs of the people experiencing homelessness in their community and the resources available. Many communities have incorporated this HUD notice into their Coordinated Entry Policies and Procedures and prioritize people experiencing chronic homelessness for PSH. Meaning, when PSH slots become available, people who have been identified as meeting the

	definition of chronic homelessness would be prioritized for that resource over people who have not.
There is an opportunity to develop an "alternative" Coordinated Entry System when the current system is limited to a specific population (i.e. people who meet the chronic homeless definition). What is the process for this?	The purpose of Coordinated Entry is to have one system through which all people seeking housing resources and related services and support are assessed and prioritized for resources. So developing an alternative or separate system would not be consistent with Coordinated Entry. However, Coordinated Entry Systems should be evaluated at least annually (and monitored on an ongoing basis). If monitoring and evaluation reveals that resources are not being matched to the people who are most vulnerable or have the most severe needs, or there are other issues with CE operations, the CoC and community can consider making adjustments, including to the prioritization factors and processes, the assessment processes, or the ways resources are allocated.
Is an ESG recipient required to do Coordinated Entry assessments or to coordinate the process?	ESG subrecipients are required to use the CoC's Coordinated Entry System/process. ESG recipients are responsible for ensuring compliance with written standards for their subrecipients.
What do we do if the ESG administrator does not take HUD requirements as seriously as the CoC?	This is an exercise in "long-term courtship" – build the relationship, show the mutual benefit, and connect it back to the people being served by the two funding sources.
Why are there requirements to review ESG – what is the connection between ESG and CoC?	Both the ESG and CoC Programs fund services directly people at-risk of or experiencing homelessness. Because of this, there is significant overlap between both the clients served by these funding streams and the providers receiving the two different funding streams. Collaboration helps a community prevent both duplication of and gaps in services, and ensure that the homeless response

	system is cohesive and planning effectively to maximize the funding sources.
How can funds, such as the CoC Planning Grant, be leveraged to support engagement of people with lived experience of homelessness?	Planning Grants are a great way to compensate people with lived expertise for their participation. People should be compensated at a comparable rate.
Is it the CoC's job to do monitoring and audits of HUD grants?	The CoC is tasked with monitoring the performance of projects. It is up to the CoC to determine exactly what that looks like. Some CoCs do choose to engage in compliance monitoring. All recipients are supposed to self-monitor themselves and sub-recipients.
Are there any fiscal monitoring requirements of the CoC?	There is no requirement for fiscal monitoring if the CoC is not a Unified Funding Agency (UFA) but many CoCs will try to support agencies by practicing fiscal monitoring consistent with HUD's monitoring tools.
How are Written Standards supposed to operate with funders creating new programs often?	The Written Standards are broad in scope to cover project types throughout the CoC – i.e. while the CoC may have many RRH projects with their own program policies and procedures, they should be consistent in the way they offer assistance per the CoC Written Standards.
Does DCA require CoC Grantees to determine citizenship status before spending federal funds on a client or contractor?	This response is pretty nuanced. In general, public agencies that receive CoC funds do have some responsibility to verify citizenship status, depending on the project component. Nonprofit service providers do not have to do so.
Should your CoC Board or Membership review and "approve" your Point in Time (PIT) and Housing Inventory Count (HIC) numbers before submission to HUD?	The CoC governance structure can designate the local process for reviewing/approving data before it's submitted to HUD.
If an approval process for the PIT/HIC numbers is not detailed in the Governance Charter, should we add a process?	Yes, please! Either in the CoC Governance Charter or as a CoC Policy.

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Can you provide information about how HUD could move the timing of PIT Count?	If communities are interested in communicating to HUD their suggestions about the PIT Count, please submit an AAQ.
How does PIT Count data impact CoC funding?	The answer to this is found in each year's NOFO application instructions and varies from year to year.
When resources and inflows into homelessness change dramatically throughout the year, is it ever recommended or beneficial to hold a supplemental PIT or HIC to be able to get an accurate representation of the community need?	Your HMIS data is really helpful to see the annualized amounts of people experiencing homelessness to supplement the PIT count.
Can the planning grant be used for gift cards for PIT count engagement or buying lunch for everyone?	The planning grant can be used for planning and conducting the PIT count, which includes purchasing gift cards for engagement. However, planning grant funds cannot be used to purchase food of any kind.
What sources do communities use to fund their HMIS?	ESG and CoC funds are both eligible. Often, local government funds are also used. Getting other funders who use data and ask funded programs to use HMIS is a good way to fund additional costs for HMIS. Philanthropy, government funders, etc., should be expected to pay into/support HMIS costs.
How often is the CoC Lead and HMIS Lead the same entity?	It happens frequently, and also, the term "CoC Lead" is not a HUD-recognized entity, so not all communities identify a "CoC Lead". The required designations are Collaborative Applicant and HMIS Lead. Even with this clarity, the Collaborative Applicant and HMIS Lead being the same entity happens frequently within communities, but is also often separated between different entities.
How do other CoCs incorporate VSP data into their LSAs?	A community would not be able to incorporate VSP data into the LSA. LSA requires client-level data and VSPs are prohibited from providing that for a community's HMIS. What can be done is partnering with the VSP to receive similar performance data, in

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	aggregate, for households they serve, separate from the LSA.
Is the 7-year timeframe across the requirement of having people with lived experience of homelessness on the CoC Board?	That seems to be how HUD defined it in the previous NOFO for scoring purposes; however, it is not a requirement that people with lived experience of homelessness on the CoC Board must have experienced homelessness within the last 7 years.
With the CoC required to have a person with lived experience of homelessness on their board, is the CoC grantee agency required to have a resident member on their board also?	Both the CoC and ESG programs require participation of people who are currently or have previously experienced homelessness on the board of directors or other equivalent policymaking body of recipients and subrecipients.
Does the CoC Board have to have term limits? Ours has defined seats from a variety of stakeholders but doesn't have term limits on the particular person from that agency who sits on the Board.	It is a best practice to have defined term limits. Some memberships can be permanent and others with limits to ensure equity, representation, and balance of power.
Being a CoC member does not equate to being a CoC Board member, but isn't it ideal to have a diverse representation on the Board, given that it is the primary decision-making body for the CoC?	Yes and it also tends to work best when a CoC Board is diverse and not too large, while the overall CoC membership and committees are avenues for many, many more people to be involved in the planning and cross-system coordination responsibility of the CoC.
How do you have members actively participate? Do they need to sign any type of conflict of interest? What are their responsibilities?	It is up to the CoC to determine how membership is defined, how organizations and individuals become members, and ways to get involved.
Will one of you talk a little bit about what is meant of an independent jurisdiction and its relationship to a Balance of State CoC? Is there a documented resource to read about independent jurisdictions?	The term "independent jurisdiction" isn't an official one in relation to CoCs. Each CoC defines its own geography. It is not uncommon for the defined geography to cover a particular jurisdiction, such as a city or county. A CoC can also cover multiple jurisdictions. A Balance of State CoC covers all areas within a state that have not otherwise been included in the geography of another CoC in that state.

What are a few examples of CoCs doing quality planning work?	For Balance of State CoCs, the Texas Balance of State and Ohio Balance of State both provide good examples for planning across a large geography.