

Role and Authority of the Local Continuum of Care

- Brief overview of the Continuum of Care (CoC) program
- Timeline of CoC Federal Regulations/State Regulations
- Overview: Collaborative Applicant and Administrative Entity roles

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HUD Continuum of Care Program

- The CoC Program is designed to promote communitywide commitment to the goal of ending homelessness
- It was created by HUD in the mid-90s to ensure that there is a local, collaborative funding and planning approach that would create the biggest impact on homelessness
- Through each CoC, grants provide funding for service providers to rehouse homeless individuals and families while minimizing the trauma and dislocation caused by experiencing homelessness
- In El Dorado County, our local CoC program is 'El Dorado Opportunity Knocks (EDOK)

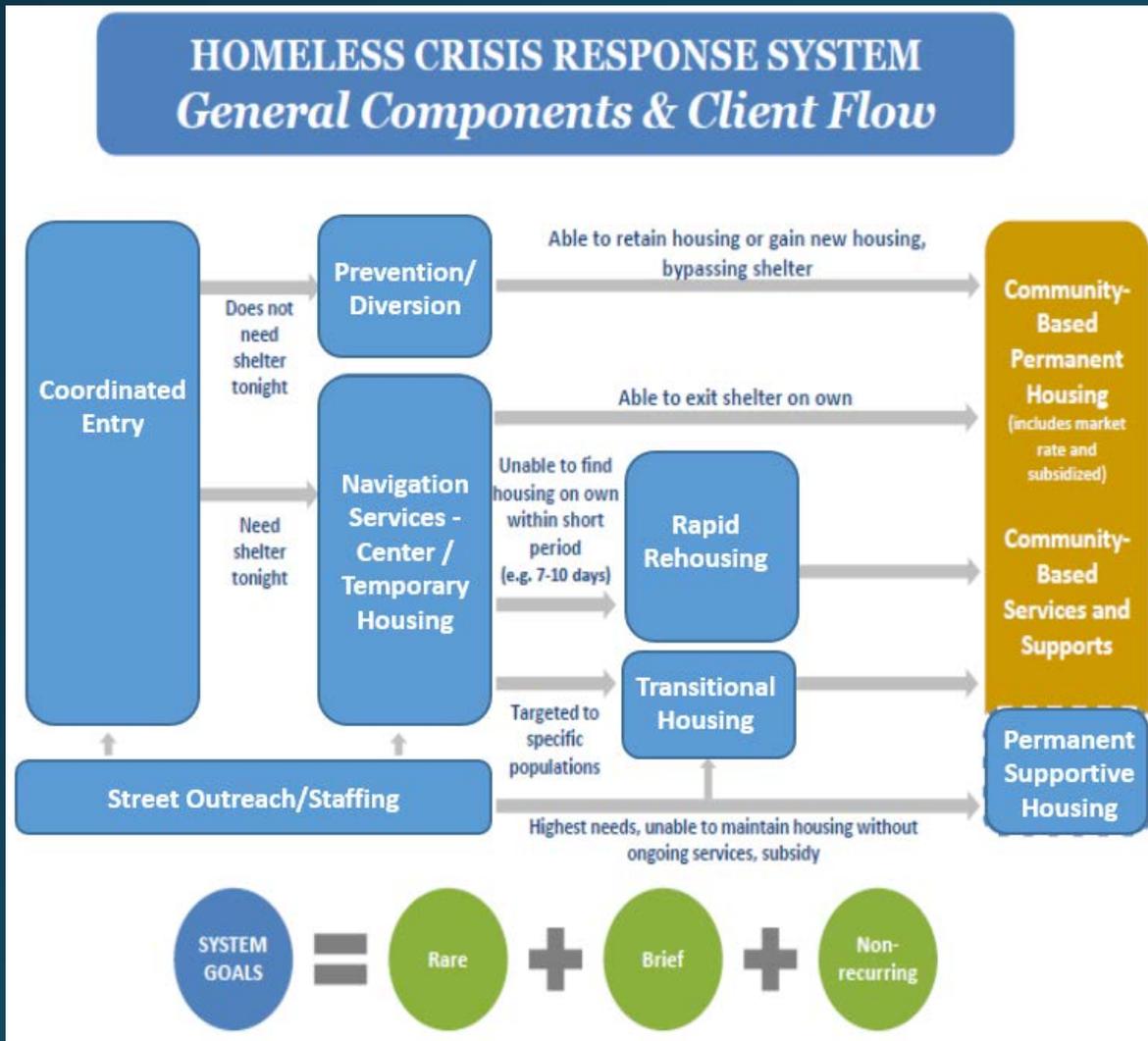
HUD Continuum of Care Program (cont.)

- The CoC is the only program available within each community, nationwide, that is tasked with developing a system response to homelessness
- Assess capacity and identify gaps
- Develop proactive solutions rather than reactive stop gaps
- Identify common goals for which to advocate, based on data and research
- Increase access to mainstream resources for residents
- Increase competitive advantage for receiving funds

Fundamental Strategies and Responsibilities

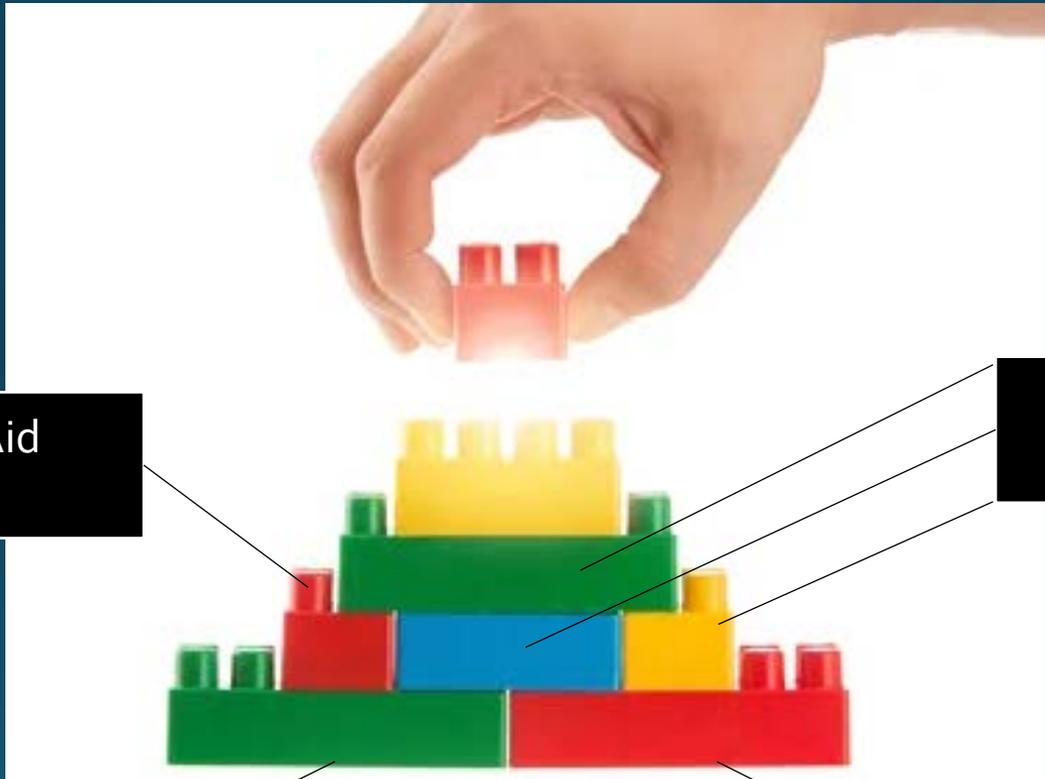
- Do not work in isolation or independently - Expand the Collaborative
- Fund programs based on needs of subpopulations and community (HMIS, Point in Time Count, Performance Measures, etc)
- Keep the CoC as a dynamic system
- Accessible to providers and user
- Develop a long-range plan
- Set strategic priorities that are measurable

“Fund Programs Based on Needs:” What Types?



- Coordinated Entry Intake Assessment
- Homeless Prevention / Diversion
- Emergency Services
- Transitional/Temporary Services
- Supportive Services
- Permanent Housing (Rapid Rehousing, Permanent Supportive Housing)

Federal Regs. + State Regs. = CoC Regulations



Homeless Emergency Aid Program (State)

Homeless Housing Assistance Program Rounds 1,2,3 (State)

HUD CoC Program Interim Rule (Fed)

Emergency Solutions Grant Interim Rule (Fed)

Evolution of Key CoC Federal Regulations

Pre-1994: Service Organizations applied individually for funding from several homeless assistance programs.

2009 – HEARTH Act (Public Law 111-22) signed into law, providing Congressional authorization of the CoC process.

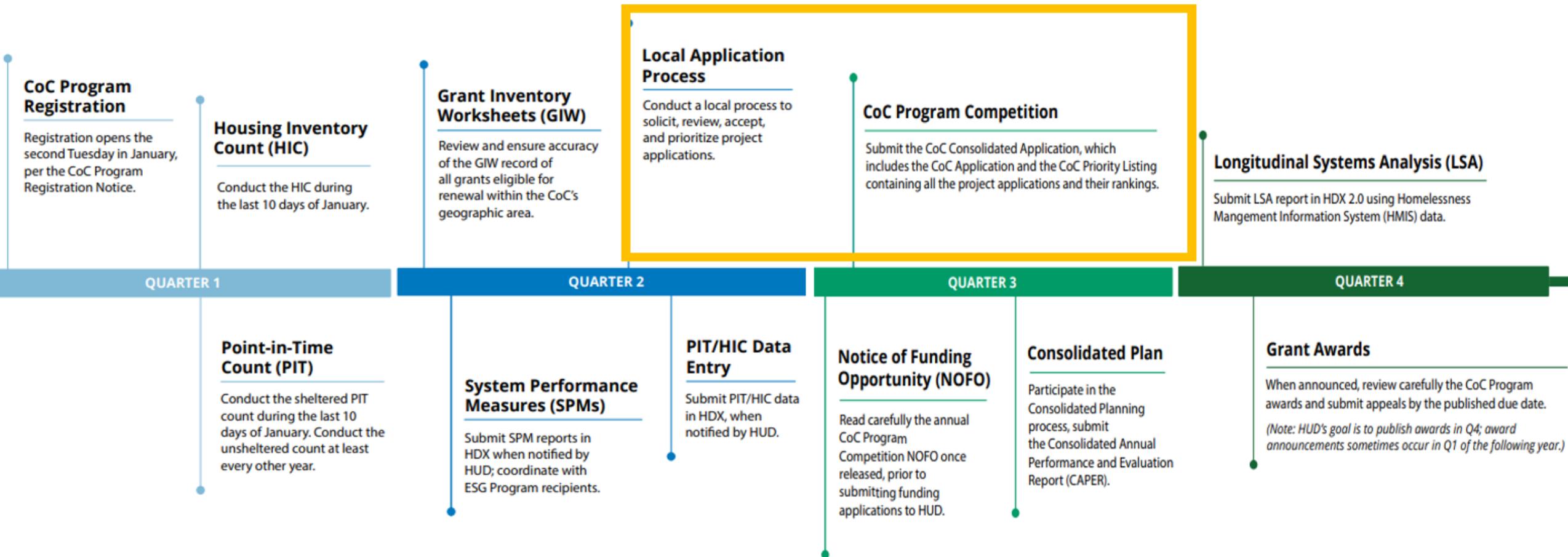
2015-2017: Coordinated Entry Policy Brief and Notice released; Requirement to launch by January 2018

1995 – CoC process established to coordinate the distribution of several competitive homeless assistance programs. Guidance was included annually in the Notice of Funding Availability (NOFA)

2012 – Regulations governing the CoC were published:
CoC Program Interim Rule and
ESG Program Interim Rule

Federal Regulations: Collaborative Applicant (CoC)

Each CoC designates one organization as the Collaborative Applicant, or the “Lead Agency” to fulfill the CoC Program Interim Rule responsibilities.



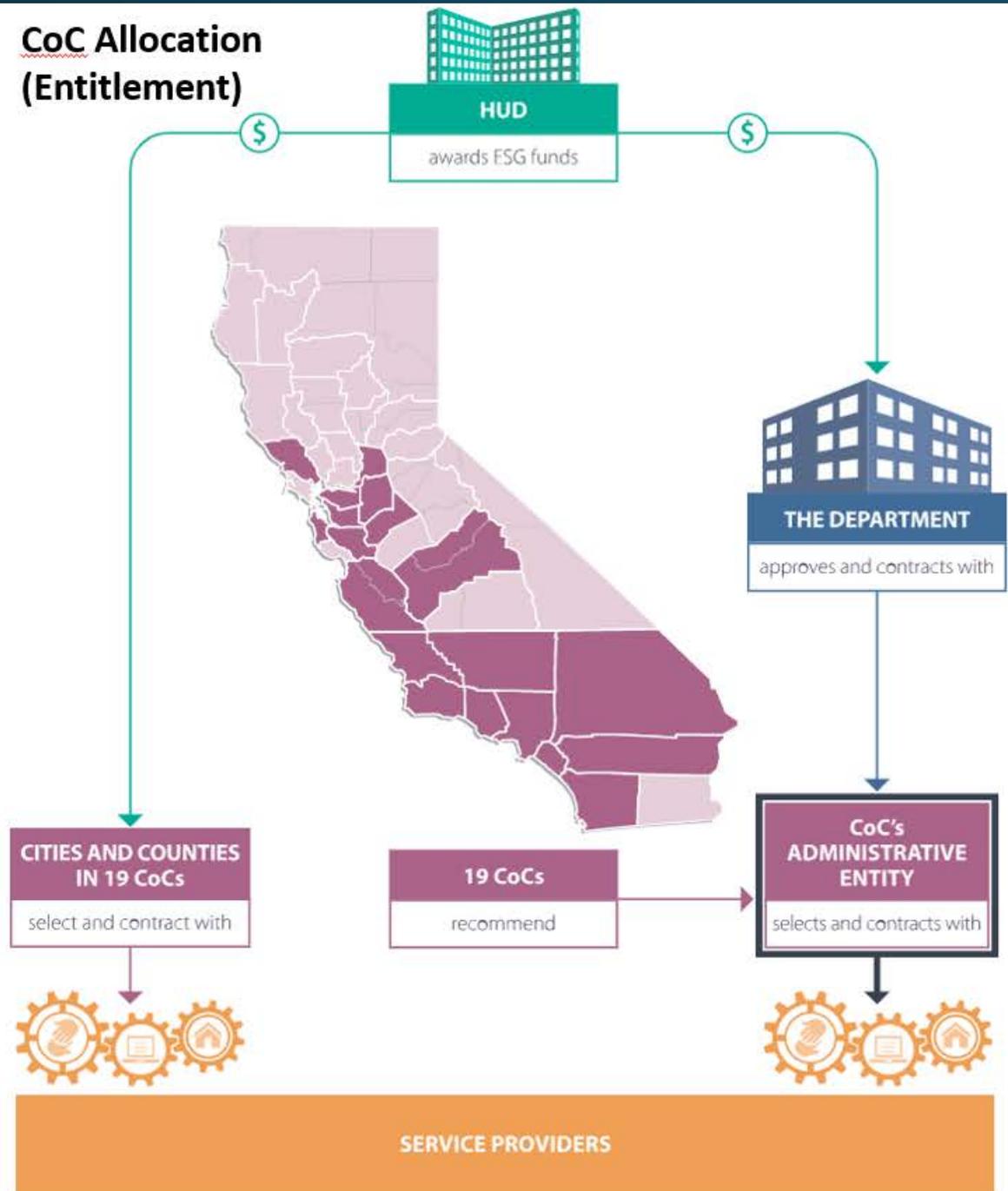
Federal Regulations: Administrative Entity (ESG)

One organization is designated as the Administrative Entity for each CoC to fulfill the ESG Program Interim Rule responsibilities

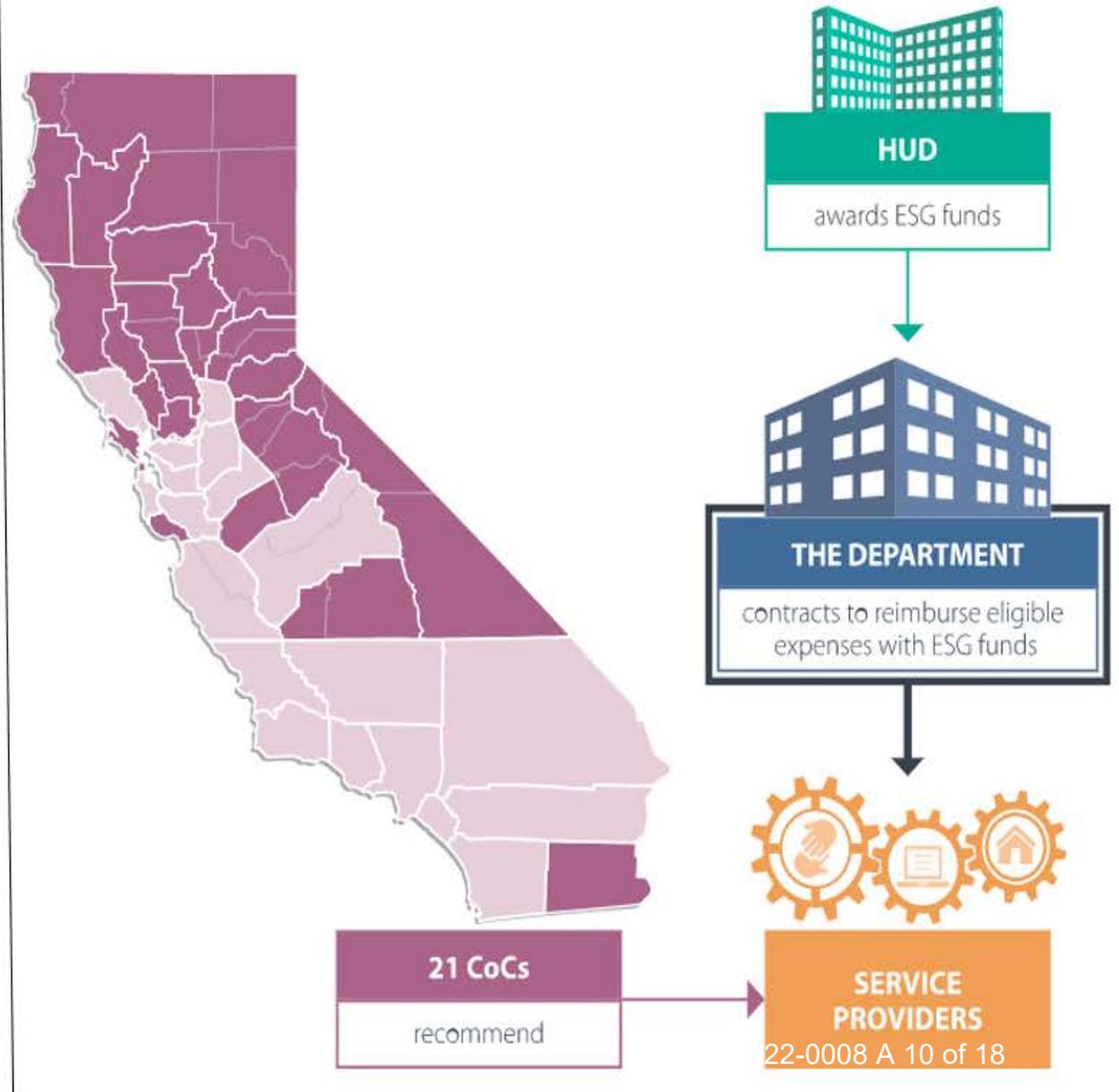
There are two processes for CoCs to leverage or compete for ESG funds:

- **CoC Allocation:** Eligible CoCs have at least one city or county that receives ESG funds directly from HUD (Entitlement Jurisdiction)
- **Balance of State Allocation (BoS):** CoCs within this allocation do not have cities or counties that receive ESG funds directly from HUD (Non-Entitlement Jurisdiction). Funds within the BoS Allocation are divided into three regional allocations.
 - The AE conducts a local funding competition within its own CoC to recommend homeless programs that are eligible under ESG and that score the highest, thereby being the most competitive for State funding

CoC Allocation (Entitlement)



Balance of State Competition (Non-Entitlement)



Evolution of CoC: State of California Key Regulations

2016: Governor Jerry Brown signed into law SB 1380. The law requires all California homeless programs to adopt guidelines and regulations that include Housing First policies

2018 – Homeless Emergency Aid Program (HEAP) was launched as the first HCFC State grant. The State required that CoC's designate an Administrative Entity (AE) to apply for the CoC allocation. The City and County Applicants are their own AE for their allocations. Requirements for all to apply for funding were to demonstrate 'regional coordination'

2017: Homeless Coordinating and Financing Council (HCFC) created to oversee implementation of Housing First policies, guidelines, and regulations. They also develop State policies and fund grants to the Big 13 Cities, 58 CA Counties, and 44 CA CoCs

2019 - 2022 – Homeless Housing Assistance Program (HHAP Rds 1,2,3) launched. Additional AE requirements added specific to 'regional coordination.'

State Requirements: Administrative Entity (State Funding):

- Since FY 17-18, “Homeless Emergency Aid Program” and “Homeless Housing Assistance Program” have required that CoCs designate an AE to fulfill the requirements of these State grants
- Regular administrative tasks include but are not limited to:
 - Drafting and submitting applications on behalf of the CoC to the State HCFC
 - Receiving the grant awards from the State
 - Developing and administering Agreements on behalf of the CoC for the projects that they applied for and were approved by the State
 - Ongoing project and system monitoring
 - State Reporting
- Because the CoC is the eligible applicant, they have the authority to allocate how their grant dollars are spent

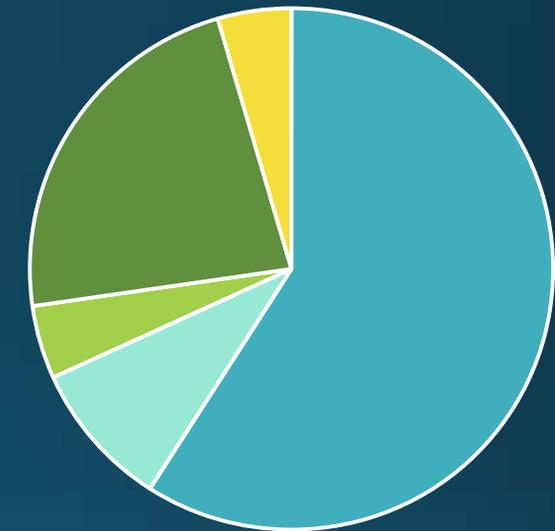
Regional Coordination Requirements for AEs

- In order to apply for HCFC funds, AEs are required to demonstrate “Regional Coordination” as defined in each grant’s ‘Program Guidance.’
- Between 2018 and 2022, the core Regional Coordination requirements have included the following:
 - Identifying all funding streams within the jurisdiction (CoC, Government, Non-Profits, etc) to address homelessness and how HCFC funds are being used to address services gaps that exist;
 - Describing how Cities, County, and CoC have coordinated to identify regional needs and how grant allocations will be coordinated to fill the identified gaps
 - Describing the prioritization criteria for the eligible program/s and how it will be connected to the CoC Coordinated Entry System
 - Submission of a regional strategic plan to impact homelessness <New>
 - Agreeing to participate in a statewide Homeless Data Integration System in accordance with HUD CoC requirements for the HMIS system <New>

Who are CA CoCs selecting as AEs? (State funds)

- In California there are 44 CoCs, with some covering several counties as a result of merging. (example: Shasta/Siskiyou, Lassen, Plumas, Del Norte, Modoc, Sierra Counties CoC)
- Consistent with Fed and State regulations, the AE can be:
 - County or City Government
 - Non-Profit Organization
 - Joint Powers Authority
 - Community Action Agency
- The CoC is responsible for selecting their AE and annually revisiting the selection, to ensure they are meeting all regulatory and administrative requirements that the CoC is responsible for meeting

AE (State funds) by CoC



County Govt City Govt
Community Action Agency Non-Profit
Joint Powers Authority

59% = County
23% = Non-Profit
09% = City
05% = CAA or IPA

In Summary.....

- The Federal Government established the foundation of the regulatory requirements for the CoC in the mid 90's
- Since 2012, the CoC Program Interim Rule and the ESG Program Interim rule further defined the regulations, including and specific to the role of the Collaborative Applicant and the Administrative Entity for HUD federal homeless funding
- Through the ESG and CoC grant programs, HUD only provides homeless grant funding through the local CoC
- Only through CoC's planning and other requirements are funding decisions made surrounding these two Federal grant programs

In Summary.....(cont.)

- Specific to California and State funds, in an effort to add resources to homeless systems in a coordinated way, the State has provided new homeless grant funding allocations since FY 17-18
- To coordinate California's Homeless Policy development with State grant opportunities, the State created HCFC to administer these grants (i.e. HEAP and HHAP)
- HCFC Grant Allocations have been made available to the Big 13 Cities, 58 Counties, and California's 44 CoCs
- In order to apply for the funding, the State has added additional requirements that complement or add to Federal CoC guidelines

In Summary..... (cont.)

- Specific to the HCFC County and Big 13 City allocations, those government entities are their own AE, while CoCs are responsible for selecting their AE to apply for the funds, on their behalf
- The CoC, County and City applicants are each responsible for making funding decisions with their respective State grant allocations
- That said, HCFC requires documentation and information from CoC, County, and City applicants that consistently demonstrates 'regional coordination' in determining how the funding is planned to be spent

In Summary..... (cont.)

- More specifically, each applicant is required:
 - To demonstrate that the program will be linked to Coordinated Entry and to demonstrate the prioritization criteria for eligibility;
 - To demonstrate that the program follows Housing First methodology;
 - To document all homeless funding streams that come into the region, to describe what they are used for, and to identify subsequent service gaps that exist and therefore warrant HCFC funding to meet that program need
 - To demonstrate that the program is tied to targeted outcomes
 - To document the above through developing and submitting a regional strategic plan as the application the HHAP 3 allocation in FY 21-22... and more
- The described combination of Federal and State regulations are what provide the authority for CoCs to develop a local system response to homelessness and also what makes them responsible for their grant allocations. This model has proven to help ensure enhanced coordination and improved outcomes for homeless residents