



Continuum of Care Structure and Governance for State ESG Recipients

WHAT IS THE COC PROGRAM?

The Continuum of Care program is designed to assist sheltered and unsheltered homeless people by providing the housing and/or services needed to help individuals move into transitional and permanent housing, with the goal of long-term stability.

Since 1995, HUD has required that communities submit a single application for homeless assistance funding through a coordinated system and entity known as a Continuum of Care (CoC) established for a local area or a larger Balance of State (BoS) region. In 2009, the HEARTH Act codified the CoC as a planning and funding mechanism and consolidated three existing competitive homeless assistance grant programs (Supportive Housing, Shelter Plus Care, and Single Room Occupancy) into a single grant program known as the Continuum of Care Program. This consolidation and the codification of the Continuum of Care planning process were intended to increase efficiency and effectiveness in providing housing and services to those experiencing homelessness.

A “Continuum of Care” is a geographically based entity that carries out the planning and local funding priority responsibilities of the HUD Continuum of Care Program. The Continuum of Care seeks to encompass all organizations providing housing and services to persons experiencing homelessness and representing the interests of those individuals and families. Through its organizational structure and governance board, the Continuum of Care designates certain “project applicants” as the entities responsible for carrying out the projects identified by the Continuum through its planning responsibilities. Each year, HUD awards CoC Program funding competitively to eligible project applicants, which can be nonprofit organizations, States, and/or units of general purpose local governments, collectively known as recipients. In turn, recipients may contract or subgrant with other organizations or government entities, known as subrecipients, to carry out the grant’s day-to-day program operations. The CoC also designates one entity to be a “collaborative applicant.” The collaborative applicant is the only entity that can submit a CoC application to HUD on behalf of the Continuum.

Balance of State CoCs

In Balance of State (BoS) CoCs, the geographic area served is usually the state’s non-metropolitan and smaller communities not covered by other Continuums.

Balance of State CoCs face special challenges as they typically serve a large geographic area with diverse needs and must address the concerns of a large number of stakeholders. Thus, extraordinary efforts may be necessary to ensure CoC participation throughout the service area. In addition to homelessness providers, participants in BoS Continuums may include local or regional planning groups, multi-purpose agencies, and homeless coalitions.

WHAT DOES THE COC DO?

The CoC is responsible for:

- Designing and implementing the local application process for HUD CoC Program funds,
- CoC planning (including determination of local needs and funding priorities used to rank local project applications),
- Operating the CoC (including coordinating the implementation of a housing and service system for those experiencing homelessness within its geographic area),
- Designating, operating, and/or ensuring projects are participating in a Homeless Management Information System (HMIS),
- Coordinating other funding streams and resources—federal, local, or private—including targeted homeless programs and other mainstream resources available to any eligible person or family.

In many communities, the Continuum of Care is the coordinating body, while in other jurisdictions it is a local or state government-established Interagency Council on Homelessness.

WHAT IS THE COC GOVERNANCE BOARD AND WHAT DOES IT DO?

Each CoC, including Balance of State CoCs, **must** establish a Governance Board to act on its behalf and provide oversight and governance, and **may** appoint additional committees or workgroups to fulfill its responsibilities. The CoC **must** develop a governance charter to describe the Board responsibilities and document all groups created to support the CoC and each group's responsibilities.

The CoC Board must be representative of all the relevant organizations and of projects serving homeless populations and subpopulations within the CoC's geographic area. The CoC Board must also include at least one currently or formerly homeless individual.

The CoC Board responsibilities include the following:

- Conduct semi-annual meetings of the full membership
- Issue a public invitation for new members, at least annually, that covers all providers and relevant agencies that provide housing or services to those who are homeless
- Adopt and follow a written process to select a board
- Appoint additional committees, subcommittees, or work groups (such as: steering committee, services, HMIS and data, coordinated entry and others as needed)
- Develop and follow a governance charter detailing the responsibilities of all parties
- Consult with recipients and subrecipients to establish performance targets appropriate for each population and program type, monitor the performance of recipients and subrecipients, evaluate outcomes, and take action against poor performers
- Evaluate and report ESG and CoC project outcomes to HUD
- Establish and operate a coordinated entry system in consultation with ESG recipients
- Establish and follow written standards for providing CoC assistance in consultation with ESG recipients

Several of these responsibilities, such as consultation and establishment of performance targets, can be especially challenging for Balance of State CoCs, due to the large number of potential stakeholders that may be spread throughout the state. Additionally, a BoS CoC must address the needs and issues in a coordinated fashion even when services and resources differ among geographic areas within a BoS.

WHAT ACTIVITIES DOES THE COC PROGRAM SUPPORT?

The CoC Program includes five primary **program components**:

- Permanent housing
- Transitional housing
- Supportive Services Only
- HMIS
- Homelessness prevention (for HUD-designated high-performing communities only)

Permanent Housing

Under the CoC Program there are two types of permanent housing:

- (1) PH: Permanent Supportive Housing (PSH), which is permanent housing with indefinite leasing or rental assistance paired with services for homeless persons with disabilities;
- (2) PH: Rapid Re-housing (RRH), which emphasizes housing identification, (short/medium term) rent and move-in assistance, case management and services to move homeless persons into permanent housing as rapidly as possible.

Transitional Housing

The CoC program may be used to cover the costs of up to 24 months of transitional housing with accompanying support services, providing a period of stability to enable homeless persons to transition successfully to and maintain permanent housing within 24 months of program entry.

Supportive Services Only

A project that offers only stand-alone supportive services, to address the special needs of participants, such as child care, employment assistance, and transportation services.

Homeless Management Information Systems

CoC funds may be used only by HMIS leads for leasing a structure in which the HMIS operates, for operating the structure, and/or for covering other costs related to establishing, operating, and customizing a CoC's HMIS. Costs associated with contributing data to the HMIS may be funded under another program component (PH, TH, SSO, or HP).

Homelessness Prevention

Programs within CoCs that have been designated by HUD as High Performing Communities (HPC) may fund homelessness prevention (HP) assistance for individuals and families at risk of homelessness. Eligible costs include housing relocation and stabilization services and short- and medium-term rental assistance to prevent an individual or family from becoming homeless.

WHAT ARE THE REQUIREMENTS FOR COORDINATION BETWEEN CONSOLIDATED PLAN JURISDICTIONS AND COCS?

All Consolidated Plan (Con Plan) jurisdictions, including States receiving direct Emergency Solutions Grants (ESG) Program awards, must consult with all CoCs in their geographic area in preparing both their homelessness strategy and their plan for allocation of resources to address the needs of homeless individuals and families and persons at risk of homelessness (see 24 CFR 91.110). For Con Plan jurisdictions that are states, this requirement applies to all CoCs in the State—not just the Balance of State CoC.

This requirement seeks to foster increased coordination among Con Plan jurisdictions and the CoC agencies serving the same areas. It is also intended to encourage greater engagement between ESG recipients and nonprofit and mainstream housing and service programs in order to increase the level of resources committed to assisting homeless individuals and families and those at imminent risk of becoming homeless.

The State ESG recipients must consult specifically with each Continuum of Care within the State on:

1. Determining **how to allocate its ESG grant** for eligible activities
2. Developing **performance standards** for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and
3. Developing **funding, policies, and procedures for the operation and administration of the HMIS.**

For additional information on the consultation and coordination requirements, see the [Coordination and Collaboration for CoCs and Con Plan Jurisdictions Guide and Video](#).

ADDITIONAL RESOURCES

[ESG State Recipient Consultation with Continuums of Care](#)

Coordination and Consultation Requirements for State ESG Recipients (insert URL)

[Introductory Guide to the Continuum of Care Program](#)

[CoC Program Interim Rule](#)