

# HUD TA for CoCs

Annual Meeting—Oregon Balance of State Continuum of Care

Salem, OR

June 28, 2017

# Purpose & Benefits of HUD TA

- HUD Technical Assistance providers engage with CoCs and providers to identify problems and arrive at solutions to help:
  - Improve the delivery of housing and services to homeless persons
  - Improve compliance with federal requirements
- HUD TA brings knowledge and experience to bear on systemic issues so that you can focus on doing more critical tasks.

Report of the Region 10  
Continuum of Care Virtual Forum  
May 15, 2017

Federal Regional Interagency Council on  
Homelessness (FRICH)



## 2. Provide Training & Technical Assistance to CoCs

- Several CoCs said that additional information and training on family and youth homelessness would be helpful.
- Training and technical assistance resources regarding collaborating with other federal agencies was also suggested
- Training tailored to balance of state and rural areas.
- TA regarding landlord incentives.
- TA regarding education and outreach to the business community.
- TA regarding CE assessment tools.

## 6. Recognize that Rural Areas Are Different

- Balance of State CoCs all remarked on the fact that they have huge geographic areas to cover with the fewest resources. Their needs and challenges are different from urban centers. Rural areas often have no emergency shelter at all, much less one tailored to youth or families, and what resources there are may be hundreds of miles apart.
- Oregon's Balance of State CoC, for example, has 1.5 FTE to support 27 counties. A disparity of funding allocations exists in rural areas: the balance of state is the second lowest in the nation in terms of persons funded per the PIT count, less than \$600 per person vs. thousands of dollars in urban areas. In Oregon, there is one state-funded RHY provider in Ontario and that is the only youth provider between Boise and Portland. Vacancy rates aren't any better in rural areas. One of Oregon's southern communities is not allowing residents in that community to stay in motels because of housing laws. Need workarounds to use federal dollars that are more reflective of what is really happening in rural areas.

# Follow-Ups

- "USICH will propose a peer-to-peer conversation on rural CoCs."
- The U.S. Interagency Council on Homelessness has since invited representatives from 10 states—including Alaska and Idaho—to convene in Boise on September 25-26, 2017, on the topic of "Ending Homelessness in Rural Communities" to hear about challenges and promising practices related to:
  - Implementing proactive outreach and engagement
  - Developing and implementing coordinated entry systems
  - Developing housing models like shared housing and host homes, if applicable
  - Engaging mainstream systems and programs like PHAs and child welfare
  - Addressing the intersection of the opioid epidemic and homelessness
  - Collecting and reporting data (including conducting PIT counts and ensuring comprehensive HMIS coverage).

# CoC Responsibilities—Operations & Planning

- Bolster CoC strategies, structures, and capacity at all levels:
  - Representation—geographic & by relevant organizations
  - Governance—board
  - Operations—meetings, outreach, board selection, committees, governance charter, performance management, evaluate CoC & ESG outcomes, coordinated entry, written standards
  - HMIS
  - Planning—system coordination, PIT count, gaps analysis, Consolidated Plan, ESG consultation

# CoC Written Standards—Compliance

- The CoC program's Interim Rule requires each Continuum of Care to establish and consistently follow written standards for providing CoC assistance [§578.7(a)(9)]. Among other things, these standards must include:
  - policies and procedures for determining and prioritizing which families and individuals will receive XYZ assistance; and
  - written policies for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance.



# CoC Written Standards—Compliance

- The CoC program’s Interim Rule assigns to each Continuum the responsibility to “establish a consistently follow written standards for providing Continuum of Care assistance” [§578.7(a)(9)].
- It is apparent that the Oregon BoS CoC has not yet done so. Since last year, when HUD began carrying out onsite reviews of CoC program grantees, Portland CPD staff have observed and remarked upon—in monitoring reports and meeting presentations—the absence of policies and procedures for Oregon Balance of State CoC recipients to follow when assisting homeless persons.

# CoC Written Standards—Compliance

- CPD has been issuing monitoring findings that call for the Continuum to, “prepare and submit to HUD for review and approval all required minimum written standards for providing CoC assistance.”
- Reviews of other grantees in the Oregon BoS CoC will likely include comparable findings, all of which will remain open until the Continuum’s standards are complete.

# CoC Written Standards—Compliance

- CPD has proposed to submit a request for HUD Technical Assistance to help the Continuum develop these required standards.

# CoC Written Standards—Compliance

- Recipients providing rental assistance under the Permanent Housing: Rapid Re-housing . . . component must follow the CoC's written standards for the amount of rental assistance each program participant must pay. These standards are not subject to the rent calculation at 24 CFR 578.77.
- Almost two-thirds of the ROCCs funding is used for rental assistance, and most of that is used in Rapid Re-housing projects. Absent written CoC standards for determining how much rent a program participant must pay, neither the ROCC nor any of its RRH programs can be in compliance with the CoC Interim Rule

# Coordinated Entry—Requirements

- CoC: 24 CFR 578.7(a)(8)
- ESG: 24 CFR 576.400(d)
- [CPD-17-01: Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System](#)