

# Continuum of Care Planning

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**Administering Agency:** HUD’s Office of Special Needs Assistance Programs within the Office of Community Planning and Development

**Year Started:** 1994

**Population Targeted:** People experiencing homelessness

**See Also:** For related information, refer to the *McKinney-Vento Homeless Assistance Programs, Ten-Year Plans to End Homelessness*, and the *Federal Surplus Property to Address Homelessness* sections of this guide

The Continuum of Care (CoC) planning process is used by communities to apply for funding from HUD’s CoC program. Through the CoC planning process, government agencies, service providers, advocates, and other stakeholders evaluate the needs of homeless people in the community, assess the performance of existing activities, and prioritize activities going forward. The CoC process was introduced by HUD in the mid-1990s. It was codified into law by Congress through the “Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009.”

## HISTORY AND PURPOSE

The CoC process was developed by HUD in 1994 to coordinate the distribution of several competitive homeless assistance programs. Prior to the CoC process, organizations applied individually for funding from several homeless assistance programs. As a result, there was little coordination between these programs or between different organizations receiving funding in the same community. The CoC process was established to promote coordination within communities and between programs. It was also designed to bring together a broader collection of stakeholders such as public agencies, the faith and business communities, and mainstream

service providers. Guidelines for the CoC planning process were included in annual Notices of Funding Availability (NOFAs), recently changed to Notices of Funding Opportunity (NOFOs) in 2021. HUD regularly modifies the process.

On May 20, 2009, President Barack Obama signed the “HEARTH Act” (Public Law 111-22), providing congressional authorization of the CoC process. Regulations governing the CoC program were published in the summer of 2012. The “HEARTH Act” reauthorized the housing title of the “McKinney-Vento Act.” HUD began issuing regulations in 2011, with the release of interim regulations on the Emergency Solutions Grant and the Homeless Management Information Systems, along with a final regulation on the definition of homelessness.

Regulations on the CoC program were published in the summer of 2012. Key changes made by the “HEARTH Act” include changes to outcome measures, funding incentives, eligibility for assistance, matching requirements, rural assistance, and administrative funding.

## SUMMARY

The term Continuum of Care (CoC) is used in many ways and can refer to the planning process, the collection of stakeholders involved in the planning process, the geographic area covered by the CoC, or the actual grant received from HUD.

The CoC planning process is typically lead and staffed by either a local government agency or a community-based nonprofit. The geography covered by a CoC can vary, covering an entire city, state, or a collection of counties. The goal of the CoC is to create a system-wide response to ensure that homelessness is rare, brief, and nonrecurring. The CoC is tasked with compiling information about homelessness in the community, including information about homeless populations and performance of homeless service programs and the community in reducing homelessness.

In recent years, HUD has incentivized coordination between CoCs and various entities including Consolidated Plan jurisdictions, public housing authorities, Housing Opportunities for Persons with AIDS, Temporary Assistance for Needy Families, Runaway and Homeless Youth, Head Start programs, and other programs.

Due to the pandemic, there was no FY 2020 CoC Program Competition, instead awarded \$2.5 billion to renew approximately 6,600 existing grants for local homeless assistance programs across the country. Renewed funding continued to support various interventions for individuals and families experiencing homelessness.

## FORECAST FOR 2022

The FY2021 CoC NOFO was released on August 18, 2021, and the submission deadline was November 16, 2021. FY2021 made approximately \$2.7 billion available nationally to serve people experiencing homelessness. In addition, \$102,000 was made available nationally for Domestic Violence Bonus Projects (only \$50,000,000 was made available in FY2019).

The “HEARTH Act” placed more of the responsibility for measuring outcomes and overseeing performance on the leaders of local CoCs. Like the FY2019 CoC competition, the FY 2021 NOFO continued to require CoCs to submit data on their system’s performance and to place a strong emphasis on performance measures that ensure homelessness is a rare, brief, and one-time experience. As CoC data collection and quality improve, HUD will likely use requested data to establish baselines for measuring improvements in future competitions. Demonstrating reductions in homelessness, the time people experience homelessness, and the effectiveness of programs continue to be emphasized.

The FY2021 CoC NOFO competition deemphasized system performance (however, HUD clarified that it would be a higher priority in the FY2022 CoC Competition) instead focusing policy priorities (1) to determine and address the impact of COVID-19, (2) continue promoting racial equity in homelessness and in the local

COC competition process, including in the local planning process current and former homeless persons with lived experience, (3) using a Housing First approach to ending homelessness, (4) reducing unsheltered homelessness, and (5) partnering with housing, health, and services agencies to improve all available resources in light of the “CARES Act” and American Rescue Plan and ensuring that communities maximize the use of mainstream and other community-based resources when serving people experiencing homelessness.

Finally, the FY2020 NOFO made Tribes and Tribally Designated Housing Entities (TDHEs) eligible to apply for projects through existing CoCs, made points available if including at least one new permanent supportive housing or rapid re-housing program that utilizes housing subsidies or subsidized housing units funded through other sources other than COC or emergency solutions grant programs, and made points available if including at least one new permanent supportive housing or rapid re-housing program that leverages health care resources to support program participants.

## TIPS FOR LOCAL SUCCESS

The CoC planning process is intended to focus on the needs of homeless people in the community and should focus on the most effective strategies for reducing homelessness. Yet many CoCs struggle to assist lower performing providers to improve their performance or shift to more effective strategies. Similarly, accessing mainstream resources, generally available for low-income people, is often difficult for people experiencing homelessness. For example, there are numerous barriers for homeless people to access employment services, housing assistance, cash assistance, and treatment services, and due to historical and ongoing structural racism, these barriers are magnified for Black, Indigenous, and other people of color (BIPOC) experiencing homelessness.

Advocates play a crucial role in ensuring that the CoC equitably serves people most in need of assistance and expands access to mainstream

resources. For CoCs to be effective, it is important that key stakeholders have a seat at the table. In many communities, the needs of children, BIPOC, LGBTQ people, veterans, people with disabilities, youth, and domestic violence survivors are not always adequately represented. Advocates should work to ensure that they are part of the CoC planning process. By joining their local CoC, advocates can inform and shape a community's priorities in addressing homelessness for current and emerging populations.

Critically, all stakeholders should participate in data collection efforts whenever appropriate and ensure that programs achieve positive and equitable outcomes. Information about the CoC Program and the local CoC coordinator can be found at HUD's Homelessness Resource Exchange website.

## FOR MORE INFORMATION

National Alliance to End Homelessness, 202-638-1526, [www.endhomelessness.org](http://www.endhomelessness.org).

HUD Homelessness Resource Exchange, <https://www.hudexchange.info>.