

# 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). 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.

As of this writing, the FY2020 CoC NOFA competition has not been implemented, and the Alliance has recommended to HUD and its congressional appropriators that the competition be suspended this year, due to the overwhelming difficulties the COVID-19 pandemic has created for people experiencing homelessness and the providers and systems that serve them, and that the FY20 funding be distributed according to the parameters established in the FY2019 NoFA.

The FY2019 CoC awards made available approximately \$2.3 billion to serve people experiencing homelessness nationally. As in previous years, although the available amount of funding was expected to be sufficient to fund eligible renewal projects, applicants for the FY2019 CoC NOFA had to prioritize projects, including renewal projects, into two tiers. The FY2019 CoC NOFA included a strong preference for performance and effective practices that Congress originally included in the “HEARTH Act.” CoCs had to place up to 6% of their funds in Tier 2, meaning these funds were at risk of being lost if the CoC was low performing. Through the “FY2020 HUD Appropriations Act,” which set aside up to \$50 million, CoCs will continue to be able to apply for a Domestic Violence Bonus for Rapid Re-Housing projects, Joint Transitional Housing and Rapid Re-Housing Component projects, and Support Services Only projects for Coordinated Entry.

## FORECAST FOR 2021

Since at the time of this writing an FY2020 CoC competition has not been launched, and since the Alliance has recommended that the competition be suspended due to the COVID-19 pandemic, the parameters of the FY19 competition described below will likely still apply in 2021.

The “HEARTH Act” placed more of the

responsibility for measuring outcomes and overseeing performance on the leaders of local CoCs. Like the previous year, the FY2019 CoC competition 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 FY2019 CoC NOFA competition also continued to emphasize that efforts to prevent and end homelessness should consider and address racial inequities to achieve positive outcomes for all persons experiencing homelessness (e.g., receiving necessary services and housing to exit homelessness). CoCs were required to identify steps they will take to ensure that traditionally marginalized populations (such as racial and ethnic minorities and persons with disabilities) will be able to meaningfully participate in the planning process. Unfortunately, the FY2019 NOFA removed specific incentives for partnering with LGBTQ-serving organization *and* any reference to LGBTQ populations at all, even though LGBTQ people are overrepresented among people experiencing homelessness. However, in report language in the “Further Consolidated Appropriations Act, 2020,” Congress directed HUD to return to the LGBTQ-inclusive language of the FY2018 CoC NOFA for its FY2020 CoC NOFA, which has not been published at the time of this writing.

Finally, the FY2019 NOFA increased the emphasis on improving employment outcomes for people experiencing homelessness, and that emphasis is expected to be continued.

## 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 equitably 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>.