

Continuum of Care Collaboration



I. Introduction

The Emergency Solutions Grant (ESG) Program is a federal program operated by the U.S. Department of Housing and Urban Development (HUD) to make grants to states, local governments, and territories for the purposes of funding activities that directly serve people experiencing homelessness, including people at risk of homelessness. The California Department of Housing and Community Development (CA HCD) is a direct recipient of ESG from HUD. CA HCD administers an annual allocation of ESG and an additional one-time allocation of ESG made available under the CARES Act.

For the purposes of this document, “annual ESG” refers to CA HCD’s annual allocation of ESG, “ESG-CV” refers to CA HCD’s one-time allocation of CARES Act ESG, and “ESG” refers in general to the CA HCD ESG program. This CoC Collaboration Policy (the “Policy”) provides the structure under which CA HCD, and organizations receiving certain ESG grants from CA HCD (“subrecipients”) as applicable, can collaborate with local CoCs in California.

A. Applicability

This Policy applies to the CA HCD annual ESG program and its subrecipients. Consultation requirements referenced by this Policy were waived by HUD for ESG-CV. HUD established alternate requirements for ESG-CV that do not mandate substantial consultation and are outside the scope of this Policy.

General Requirements

A. Overview

As an ESG recipient, CA HCD is required by 24 CFR Part 576 (the “ESG Program Interim Rule”) and 24 CFR Part 91 (which addresses consolidated planning for certain HUD-funded jurisdictions) to consult with each Continuum of Care (CoC) in its geographic coverage area regarding the implementation of ESG funding in its geography. Since CA HCD is a State recipient, this requires consulting with each CoC in the State of California. This Policy defines the actions that CA HCD takes to meet those requirements.

In addition to ESG’s regulatory requirement, each CoC is required by 24 CFR Part 578 (the “Continuum of Care Program Interim Rule”) to consult with each ESG recipient in

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its geographic area. This Policy defines the actions CA HCD takes to assist CoCs in meeting this requirement.

B. Collaboration Requirements

Both CA HCD and each CoC in California are required to coordinate the development and implementation of effective homelessness responses using their respective funding streams. The regulatory requirements for collaboration are as follows:

1. Coordinated Assessment
 - a. Each ESG-funded program or project within a given CoC's area must use that CoC's coordinated assessment system (often called a coordinated entry system). CA HCD or its subrecipients must work with the CoC to ensure the screening, assessment, and referral of program participants are consistent with ESG written standards required under 24 CFR 576.400(e).¹
 - b. CA HCD must describe each CoC's coordinated assessment system in the ESG-specific section of its Annual Action Plan.²
 - c. Each CoC is required to consult with CA HCD to establish and operate a coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services.³
2. Written Standards
 - a. Each CoC is required to consult with CA HCD to establish and consistently follow written standards for providing CoC assistance.⁴
3. Planning and Reporting for the ESG Program
 - a. CA HCD is required to consult with each CoC to determine how to allocate ESG funds, develop performance standards for projects and activities assisted with ESG funds, evaluate the outcomes of projects and activities assisted with ESG funds, and develop funding, policies, and procedures for the administration and operation of the CoC's Homeless Management Information System (HMIS).⁵

¹ 24 CFR 576.400(d)

² 24 CFR 91.320(k)(3)(ii)

³ 24 CFR 578.7(a)(8)

⁴ 24 CFR 578.7(a)(9)

⁵ 24 CFR 576.400(a); 91.110(e)

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- b. In the Annual Action Plan, CA HCD must describe its consultation with each CoC in addressing topics identified in section B.3.a of this Policy.⁶
- c. In the ESG-specific portion of the Consolidated Annual Performance and Evaluation Report (CAPER), CA HCD must include, in a form prescribed by HUD, the number of persons assisted, types of assistance provided, and project or program outcomes data measured under the performance standards developed in consultation with each CoC.⁷
- d. Each CoC must consult with CA HCD on the plan for allocating ESG program funds, reporting on the performance of ESG funded projects, and evaluating the performance of ESG-funded projects.⁸
- e. Each CoC must evaluate the outcomes of projects funded under the ESG program and the CoC program in its jurisdiction and report to HUD.⁹

C. Other Topics for Collaboration

While not formally required, closer collaboration between CA HCD and CoCs will improve consistency in service delivery, allocation decisions, data collection, and community-level alignment regarding priority populations, as well as ensuring homeless services systems are operating effectively in relation to both local and HUD-defined system performance measures. Focus areas for collaboration include but are not limited to:

1. Additional Criteria for the “At Risk of Homelessness” Definition – CA HCD may establish additional criteria for qualification under the “at risk of homelessness” definition.¹⁰ These characteristics empower CA HCD to broaden access to ESG-funded homelessness prevention to populations with demonstrable local need who would otherwise be excluded.
2. Discharge Planning – CA HCD and recipients of CoC Program funds that are State or local governments are required to establish and implement discharge

⁶ 24 CFR 91.320(k)(3)(v)

⁷ 24 CFR 91.520(g)

⁸ 24 CFR 578.7(c)(5)

⁹ 24 CFR 578.7(a)(7)

¹⁰ CA HCD would need to articulate the specific characteristics associated with an increased risk of homelessness in the homeless needs assessment section of its consolidated plan/annual action plan. CA HCD should solicit input from California’s CoCs regarding which characteristics, if any, it should define, as well as the potential impacts of characteristics it proposes to define.

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policies that prevent people from being discharged from publicly funded systems of care into homelessness. Collaboration between CA HCD and the local governments that receive CoC funding is an important way to ensure the effectiveness of discharge plans statewide.

3. System Planning – Each CoC is required to develop a plan to coordinate homeless housing and services system within its geographic area. This system must, at a minimum, encompass outreach, engagement, and assessment, shelter, housing, and supportive services, and prevention strategies. CA HCD should work with CoCs to ensure that ESG funds are used as effectively as possible to support each CoC’s system plan. This is particularly important for ESG-funded emergency shelter, system-level street outreach, and homelessness prevention, as the CoC Program cannot usually fund these activities.

D. Collaboration Priorities

CA HCD recognizes the importance of collaboration with CoCs goes beyond regulatory compliance to positively impact systems that prevent and end homelessness. However, the large number of CoCs in California, CA HCD staff capacity, and issues associated with geographic distribution of CA HCD ESG funding prevent individualized collaboration with each CoC on all topic areas. As such, CA HCD will prioritize and design its CoC collaboration and engagement activities based on the strategy presented in this section of the Policy.

1. Definitions
 - a. “High Priority” refers to a regulatory requirement or optional collaboration topic that is critical to CA HCD’s ability to implement the ESG program in an effective and compliant manner
 - b. “Medium Priority” refers to a regulatory requirement or optional collaboration topic that is important for CA HCD’s ESG program, but necessitates a lower level of interactive feedback from CoCs
 - c. “Low Priority” refers to a collaboration topic that is not a direct requirement of CA HCD or does not require consistent, proactive outreach to CoCs
2. Prioritization Table

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High Priority	Medium Priority	Low Priority
1. Coordinated assessment	1. Annual Action Plan	1. CoC written standards
2. Allocation of ESG funds	2. Consolidated Plan	2. Defining additional “at risk of homelessness” criteria
3. Performance standards and outcome evaluation for ESG projects	3. CAPER reporting	
4. Planning and implementing HMIS	4. Discharge Planning	
	5. System Planning	

3. Prioritization Conditions

- a. CA HCD will review the prioritization table above annually
- b. CA HCD reserves the right to amend the prioritization table at any time
- c. The prioritization table defines the minimum level of effort necessary for a given topic; CA HCD may, at its discretion, escalate engagement on a given topic or with a given CoC without amending this Policy
- d. CA HCD will focus engagement on CoCs that are actively under contract to receive CA HCD ESG annual funding; CoCs that do not meet this criterion may, at CA HCD’s discretion, receive lower levels of engagement than indicated on the prioritization table

E. Collaboration Practices

Effective collaboration requires CA HCD to work directly with CoCs to meet ESG collaboration requirements, meet CoC collaboration requirements, and implement ESG/CoC engagement strategies that are manageable and scalable given time and staff constraints for both CA HCD and CoCs. CA HCD will use the prioritization table in section D of this Policy to determine the engagement approach for the topics contained therein.

1. General Collaboration Guidelines

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- a. CA HCD will, to the maximum extent possible, coordinate internally and with other state level partners in its CoC outreach efforts to increase efficiency and prevent duplication of effort
 - b. CA HCD will, to the maximum extent practicable, leverage existing venues (e.g., CoC membership meetings, Annual Action Plan listening sessions, Office Hours sessions) to solicit CoC feedback
 - c. CA HCD may, at its discretion, seek individualized engagement from interested parties in any given CoC when such engagement may increase equity or otherwise facilitate collection of critical feedback on topics identified in this Policy
2. Collaboration with Tribal Nations
- a. CA HCD recognizes the sovereignty of Tribal Nations and seeks to engage directly with Tribal Nations as a critical aspect of its CoC collaboration practices
 - b. CA HCD expects CoCs that receive funding for homelessness response through CA HCD to actively include Tribal Nations and Tribally Designated Housing Entities (TDHE) inside of and/or adjacent to their geographic areas in planning, design, and implementation of the local homelessness response system
 - c. When collaborating with a given CoC, CA HCD will directly solicit feedback from Tribal Nations and TDHEs inside of and/or adjacent to that CoC's geographic area using the same prioritization and engagement techniques described in this Policy
 - d. CA HCD may, at its discretion, engage independently with Tribal Nations and TDHEs outside of the CoC collaboration process prescribed by this Policy to obtain feedback on collaboration topics identified within this Policy
3. High Priority Topics
- a. CA HCD will pursue collaboration through multiple venues and encourage active dialogue for high priority items
 - b. CA HCD will, at least annually, survey CoCs to collect feedback on high priority items
 - c. CA HCD will hold a ESG Office Hours spotlight session at least once annually for each high priority item and solicit CoC feedback during that session

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- d. CA HCD may, at its discretion, facilitate listening sessions, focus groups, or other gatherings, either in-person or virtually, to collect CoC feedback and clarify previously gathered feedback related to high priority items
 - e. CA HCD will perform proactive outreach to seek engagement from non-responsive CoCs for high priority items
 - f. Where feasible, CA HCD will solicit feedback from CoC membership, especially recipients and subrecipients of federal funding for homelessness response, in addition to CoC leadership
4. Medium Priority Topics
- a. CA HCD will, at least annually, survey CoCs to collect feedback on medium priority items
 - b. CA HCD may, at its discretion, seek individualized feedback from select CoCs either in-person, virtually, or via email
 - c. CA HCD may, at its discretion, perform proactive outreach to seek engagement from non-responsive CoCs for medium priority items
5. Low Priority Topics
- a. CA HCD may pursue active collaboration on low priority items at its discretion, but will otherwise collaborate on these topics only by CoC request
 - b. CA HCD will be responsive to CoC requests related to low priority items and will respond to such requests as feasible in a timely manner