

ACHIEVING THE CRITERIA OF THE CONTINUUM OF CARE GRANT:  
AN EVALUATION OF THE APPLICATION OF YOLO COUNTY'S HOMELESS AND  
POVERTY ACTION COALITION

A Thesis

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by

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Abstract  
of  
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The United States Department of Housing and Urban Development (HUD) administers grant funding through the Continuum of Care Program for the provision of housing and services to the homeless. In order to receive funding for this program, local communities must form collaborative bodies, known as Continuums of Care, for their region and apply for funds. The program is competitive with Continuums of Care throughout the nation competing against each other through a scored application process. The score that a Continuum of Care obtains ultimately determines the number of projects that receive funding in its region.

Yolo County's Homeless and Poverty Action Coalition (HPAC) is the collaborative body that coordinates and applies for Continuum of Care Program grant funding for homeless housing and services in its region. For the past two scoring rounds, fiscal year (FY) 2012 and FY 2013, the HPAC has obtained a score below the national average. In order to maintain funding for their projects and potentially obtain funding for bonus projects in the future, the HPAC needs to

improve its score. Since HUD does not supply Continuums of Care with a justification for the scores they receive, I conducted an evaluation of the application of the HPAC in order to determine how they might increase their grant score through improved alignment with HUD's scoring criteria. For this analysis, I compared the application responses of the HPAC to the scoring criteria of HUD for the FY 2013-FY 2014 Continuum of Care Program competition to detect potential deficiencies that resulted in their reduced score.

Based on the evaluation of the HPAC's responses, I identified four categories of recommendations. I recommend that the HPAC fully implement and utilize their Homeless Management Information System and Coordinated Entry system, improve some of their planning and procedures, increase permanent housing in their region, and provide more detail on their Continuum of Care application.

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## Chapter One

### INTRODUCTION

As studies show, homelessness is detrimental to the health of homeless individuals (Henwood, Cabassa, Craig, & Padgett, 2013) while also being costly to the public in healthcare (Sadowski, Kee, VanderWeele, & Buchanan, 2009), incarceration, and shelter services utilized (USICH, 2010). Yolo County sought to address this issue in 2009 through the enactment of a ten-year strategic plan to end homelessness. However, since its inception, there has been little reduction in the homeless population in the community (County of Yolo, 2014). In order to reach the goals of its strategic plan, a 2014 Yolo County report, *Homelessness in Yolo County: Strengthening the Community-Wide Homeless System*, recommended a two-stage approach (County of Yolo). The first stage called for greater “collaboration, leadership and accountability” regarding homelessness in the community, particularly concerning the County’s ten-year strategic plan. The second stage called for increased funding for homeless services and affordable housing as well as identifying ways to more efficiently use resources (County of Yolo, 2014). In this thesis, I address the latter point by evaluating how the County, through the Homeless and Poverty Action Coalition, might maintain and increase the funding it receives from the Continuum of Care grant.

When it comes to funding for homeless services and housing, the County relies heavily on federal grants as organized through the Yolo County Homeless and Poverty Action Coalition (HPAC). This coalition is a collection of non-profit and government representatives with an interest in assisting both the homeless and people with low-

income. The County is particularly reliant on the competitive United States Department of Housing and Urban Development (HUD) Continuum of Care (CoC) grant as it comprises close to 40% of their federal grant funding for homeless service provision (County of Yolo, 2014). This grant requires that local communities form collaborative bodies, known as Continuums of Care (CoC) and apply for funds through a competitive application process. In this process, HUD assigns an application score to CoCs based on their alignment with specified scoring criteria. HUD then ranks each CoC by their score and awards funding to each CoC's projects, in order of highest to lowest score, until the grant program runs out of funds. As a result, a high score is desirable since it provides greater assurance that a CoC will receive funding for all of its projects.

The HPAC's score has fallen below the national average for the past two scoring rounds in fiscal year (FY) 2012 and FY 2013. While the HPAC received funding for all of its projects in the FY 2013 round (HUD, 2015b), it did not receive funding for three of its projects in the FY 2012 round (HUD, 2013a). In order to ensure continued funding through the grant for the HPAC's homeless service projects and to potentially obtain funding for bonus projects in the future, the HPAC needs to improve its score. However, HUD assigns scores in broad categories without explanation. Therefore, it requires analysis to determine exactly what portions of the categories are falling short.

In this thesis, I present an evaluation of the HPAC's application in comparison to the scoring criteria of the CoC Program grant. I intend to determine how the HPAC might improve their score by better aligning with the grant scoring criteria. In this way, the HPAC may maintain its funding and potentially increase it with bonus projects in the



future, in accordance with stage two of Yolo County's assessment, and subsequently obtain a greater reduction of homelessness in their region.

### **Homeless Subpopulations**

The current homeless population consists of four subpopulations as recognized by the federal government. In the federal government's 2010 ten-year strategic plan, entitled *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*, the subpopulations listed are individuals, veterans, families, and, coupled together, unaccompanied youth and children (USICH, 2010). However, there are additional descriptive terms for homeless people used outside of these four subpopulations. The term chronically homeless, utilized by HUD, refers to homeless individuals and families with a disability, including substance abuse or mental health conditions, that have been homeless for at least a year or have experienced homelessness four times in the past three years (HUD, 2012b). Additionally, the terms sheltered and unsheltered homeless are commonly used. Sheltered homeless refers to people residing in one of three types of homeless housing: transitional housing, emergency shelters or safe havens. Unsheltered homeless are people that reside in, "...places not meant for human habitation" (HUD, 2014g). HUD utilizes all of these terms to characterize the homeless population in the annual Point-in-Time Counts.

HUD requires CoCs to conduct a Point-in-Time (PIT) Count to estimate the extent of the homeless population and their characteristics in their community. Specifically, this is a count of all homeless people, in a geographic area, for one night (HUD, 2014g). While HUD collects PIT Count data annually from CoCs in the nation,

the HPAC conducts them for Yolo County every two years, making 2013 its most recent PIT Count data available. Therefore, the PIT Count data for 2013 will be the data described, beginning with the results nationally and then the results of Yolo County in the section that follows.

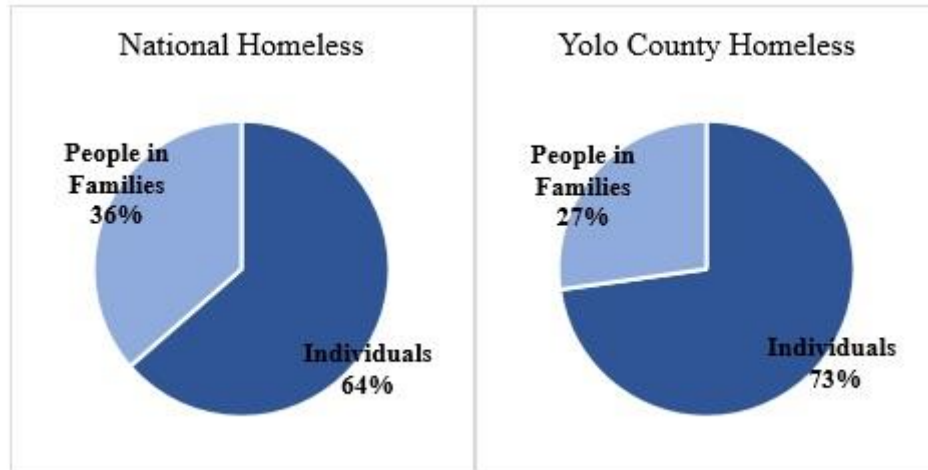
### **Homelessness Nationally**

Based on the national 2013 PIT Count data, 610,042 people were counted as homeless in the United States (HUD, 2013e). However, this estimate for the homeless population is probably lower than the actual amount of homeless. Since PIT Counts only include those who are sheltered or unsheltered, the data does not include those who have found other forms of shelter (Katel, 2014) such as people who are incarcerated or institutionalized. It also does not include people staying with family or friends, known as “doubling up” (USICH, 2010).

When it comes to individuals and families (see Figure 1), individuals represented the majority of the homeless population at 64% in the nation. This amount included unaccompanied children and youth (HUD, 2013e). Homeless families represented 36% of the national homeless population, the vast majority of which were sheltered (HUD, 2013e). HUD defines a homeless family as made up of at least one adult and one child. In the PIT Count, HUD refers to families as “people in families” and counts them based on the number of members in a family (HUD, 2013e). This subpopulation is commonly composed of a single woman with one or two children and their homelessness is occasionally the result of a domestic violence situation (USICH, 2010).

Figure 1:

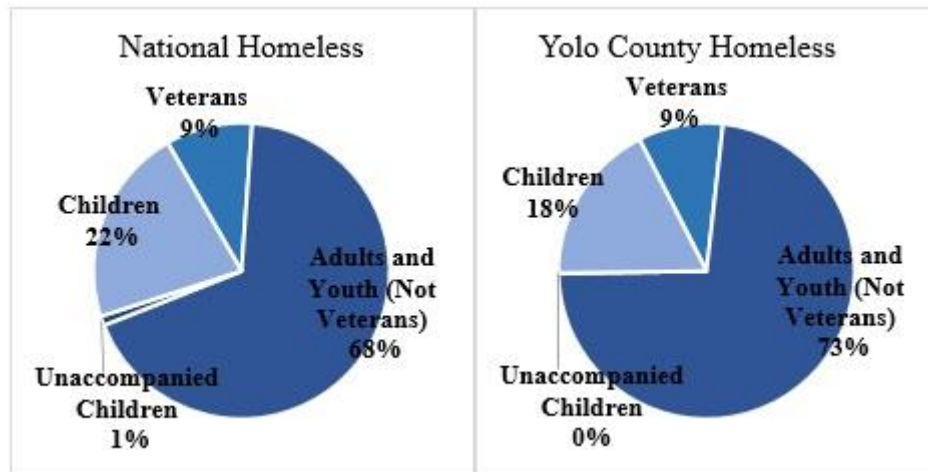
2013 PIT Count Showing Homeless Subpopulations of Individuals and Families



Sources: Adapted from County of Yolo (2013) and HUD (2013e).

Figure 2:

2013 PIT Count Showing Homeless Subpopulations of Veterans, Adults/Youth, Children and Unaccompanied Children



Sources: Adapted from County of Yolo (2013) and HUD (2013e).

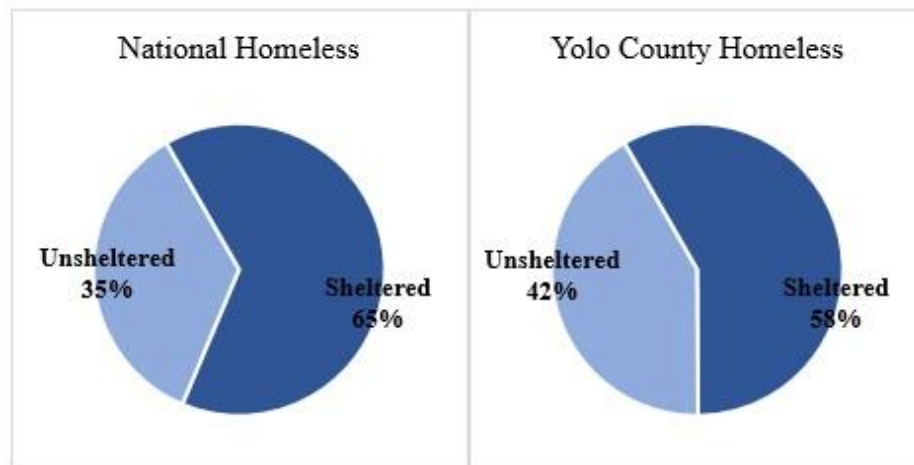
Veterans are common in the individual homeless subpopulation, often struggling with physical ailments, substance abuse or mental disorders such as Post Traumatic

Stress Disorder (USICH, 2010). Specifically, as shown in Figure 2, veterans represented 9% of the national homeless population counted (HUD, 2013e). The numbers on unaccompanied children and youth are difficult to determine since the age ranges differ in various estimates and they are more commonly doubling up (USICH, 2010). However, in 2013, HUD, which categorizes children as age 18 years and younger, counted unaccompanied children at 1%. They also counted unaccompanied youth, categorized as 18 to 24 years and combined in Figure 2 with adults, at close to 7% (HUD, 2013e).

As to the sheltered and unsheltered status of those experiencing homelessness, the majority of the national homeless population was sheltered in 2013. As shown in Figure 3, 65% of the national homeless population was sheltered while 35% remained unsheltered (HUD, 2013e).

*Figure 3:*

2013 PIT Count Showing Sheltered and Unsheltered Homeless



Sources: Adapted from County of Yolo (2013) and HUD (2013e).

**Homelessness in Yolo County: The Homeless and Poverty Action Coalition (HPAC)**

The HPAC is the CoC body representing the city of Davis, city of Woodland and Yolo County. It boasts a membership of a diverse set of representatives of non-profit and government service providers (Yolo County Homeless and Poverty Action Coalition (HPAC), 2014a) and has operated for over a decade. According to the 2013 PIT Count, as displayed in Figures 1 through 3, the homeless population in the HPAC region consisted of 474 people with subpopulations similar to the national numbers— a majority of adult, individual, and sheltered homeless. The HPAC differed from the national numbers because it showed no unaccompanied youth or children in its region (County of Yolo, 2013). However, compared to other CoCs in the state of California, the HPAC is in charge of assisting a relatively small homeless population. Out of the forty CoCs in California in 2013, the region of the HPAC had the sixth lowest homeless population based on the 2013 PIT Count (HUD, 2014a). With the total homeless population for California at 136,826 in 2013 (HUD, 2014a), this rank places the HPAC in charge of collecting CoC grant funds for 0.346% of the total California homeless population.

The HPAC operates in the geographic area of Yolo County and has incorporated its ten-year strategic plan to end homelessness (HPAC, 2014a). In 2010 Yolo County began its strategic plan in line with the goals of the federal government to both prevent and end homelessness. The plan consists of four goals: prevention, provision of affordable and permanent housing, supportive services, and implementation (County of Yolo, 2010). However, a significant reduction in homelessness has not occurred since its adoption. As shown in Table 1.1, Yolo County had an initial slight reduction in the

homeless population after the 2007 recession. Nevertheless, since then the population has remained relatively unchanged despite the start of the ten-year strategic plan in 2010.

*Table 1.1:*

PIT Counts for Yolo County Homeless 2007-2013

<b>Jurisdiction</b>	<b>2007</b>	<b>2009</b>	<b>2011</b>	<b>2013</b>
Rural	9	2	8	9
Davis	86	114	117	114
West Sacramento	138	230	192	165
Woodland	181	145	151	186
<b>Total</b>	414	491	468	474

Source: County of Yolo (2014).

### **The Continuum of Care Program**

The purpose of HUD's CoC Program is to provide grant funding to communities for the provision of housing or necessary services in order to help homeless individuals and families stabilize into permanent or transitional housing (HUD, 2012c). In order to apply for the grant, providers in the community, such as non-profits, private agencies, and governments, must collectively come together and establish a local CoC to submit an application for and administer the funds received. This is done out of the desire of HUD to encourage community wide efforts to combat homelessness (HUD, 2012c). The grant is competitive with all CoCs vying for funding under the criteria specified in the Notice of Funding Availability (NOFA) released by HUD each fiscal year.

In Yolo County, the CoC Program provides close to 40% of the federal grant funding for their homeless service provision. The majority of the funding in the County comes from three federal grants as well as private donations. Specifically, in 2012 the CoC grant provided \$523,314 to Yolo County through the HPAC (County of Yolo,

2014). However, as stated, the grant is competitive, with all CoCs in the nation competing against each other for the limited amount of funds that HUD has to administer each fiscal year.

In order to ensure that all of its projects receive funding, the HPAC will need to increase its score for future competitions. On its FY 2012 grant application, the HPAC scored below the national average of 94.81 with a score of 89.7 (County of Yolo, 2014). Moreover, only five out of the eight projects for which the HPAC requested CoC grant funding that year received it (HUD, 2013a; HPAC, 2013). It is possible that the HPAC's score led to these projects not receiving funding. However, it is also possible that HUD did not fund these projects because they did not meet the minimum requirements.

Unfortunately, I did not have documentation to confirm this. Additionally, when it comes to the HPAC's application for FY 2013, they received 93.25 out of a potential 156 points (HUD, n.d.-b). This was below the national average of 113.5 points (HUD, 2014g).

Despite the HPAC's score, all of the homeless service projects in the HPAC that applied for CoC grant funding that year received it (HUD, 2015b). Nonetheless, if the scores of the HPAC do not improve and if competition for the grant continues to increase, not all projects may receive funding in the future.

While the amount was unspecified, the assessment report of Yolo County acknowledged that the funding currently received by homeless services is not sufficient (County of Yolo, 2014). To solve this problem, in stage two of its recommended approach, the report called for obtaining additional sources of funding outside of federal grants and private donations while also improving HPAC's alignment with the CoC grant

criteria. By better aligning the services of the HPAC with the CoC grant scoring criteria, Yolo County and the HPAC would ensure that funding does not decrease for its homeless service projects and potentially qualify for increased funding through bonus projects.

### **Conclusion**

In the following thesis, I conduct an evaluation of the HPAC by comparing the CoC Program grant scoring criteria to the responses of the HPAC on their application. Ultimately, I identify potential areas for improvement to help the HPAC better align with the scoring criteria of the CoC Program, thereby increasing their grant score. An increased score will help ensure grant funding for the HPAC's projects in future competitions as well as potentially increase their funding through bonus projects.

The next chapter consists of a review of the national best practices regarding homelessness as well as a discussion of how HUD and the HPAC utilize these practices. Following in Chapter 3, I explain the grant requirements and application process of the CoC Program to provide a foundation for how an improved score could benefit the HPAC. In Chapter 4, I detail the scoring criteria of the CoC Program as provided in the FY 2013-FY 2014 Notice of Funding Availability (NOFA) and give a brief description of the methodology for the evaluation that follows. I conduct an analysis of the HPAC in Chapter 5 by comparing its application responses to the grant scoring criteria of the FY 2013-FY 2014 NOFA and discuss some potential areas of deficiency that resulted in the HPAC's diminished score. Finally, in Chapter 6, I provide recommendations regarding potential areas of grant score improvement for the HPAC.



## Chapter Two

### REVIEW OF BEST PRACTICES

The Department of Housing and Urban Development (HUD) is the administrative body in charge of conducting the Continuum of Care (CoC) Program. As a federal body, the department utilizes the program to assist in the attainment of the federal government's goal to prevent and end homelessness (HUD, 2012b). HUD intends to achieve this goal by funding the provision of housing and supportive services in accordance with best practices. The current best practices for homelessness, as detailed by the National Alliance to End Homelessness, are Housing First, the provision of "just enough" assistance, and a strategic local response (National Alliance to End Homelessness, 2014). These practices form the basis of the scoring criteria for the CoC Program competition making their usage by CoCs key to receiving a high score. Therefore, in this chapter, I discuss the best practices for reducing homelessness. I begin with a discussion of the federal goal to prevent and end homelessness, which is the catalyst behind the new strategies. Then I detail each of the three best practices by describing the research supporting them, how HUD utilizes them in the CoC Program, and how the services of the HPAC measure up to these practices.

#### **Preventing and Ending Homelessness**

Preventing and ending homelessness is a recently developed concept for supplying homeless services. It encompasses the idea that homelessness is a solvable issue thereby allowing for its prevention and abolishment. This concept emerged from research that developed in response to the increase in homelessness in the 1980s. The

general approach to homelessness at the time involved managing the issue. This occurred, according to Padgett, Stanhope, Henwood, and Stefancic (2011), through the provision of temporary housing or emergency shelters alongside assistance services, like drug treatment. However, as described by Burt and Spellman (2007), developing research resulted in a change in the approach of the issue, from “*managing* homelessness to *ending* it”. Research emerged to evaluate and assist in these efforts, focusing on a switch in intervention strategies for the homeless from shelters and transitional housing to the concept of Housing First and prevention efforts.

*Table 2.1:*

*Goals of the Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*

<b>Goals:</b>
1. Finish the job of ending chronic homelessness in 5 years
2. Prevent and end homelessness among veterans in 5 years
3. Prevent and end homelessness for families, youth and children in 10 years
4. Set a path to ending all types of homelessness

Source: Adapted from USICH (2010).

The federal government followed the change in research and in 2001 announced a goal to end chronic homelessness in ten years that states and local governments soon adopted (Burt & Spellman, 2007). With the onset of the 2007 recession and subsequent change in presidential administrations, the administration of President Barack Obama altered and reinstated this goal into a new ten-year plan (Katel, 2014): the 2010 *Opening Doors Federal Strategic Plan to Prevent and End Homelessness*. This plan expanded on the previous goal to focus on all types of homelessness rather than just chronic homelessness (United States Interagency Council on Homelessness (USICH), 2010).

Specifically, *Opening Doors* includes four ambitious goals as shown in Table 2.1. These goals seek to both prevent and end homelessness for specific homeless subpopulations with deadlines for achievement.

### **HUD’S Approach to Preventing and Ending Homelessness**

As a department of the federal government, HUD seeks to accomplish the federal strategic plan to prevent and end homelessness. This means that HUD strives to achieve the four goals of the *Opening Doors* plan (HUD, 2013d). To meet these goals HUD funds CoCs for providing homeless services in accordance with best practices, for developing local plans to meet the federal goals, and for actual performance results in reducing homelessness (HUD, 2013d). In the CoC Program, HUD’s current focus is on funding efforts at ending homelessness, not prevention. Another grant provided by HUD, the Emergency Solutions Grant, serves as a funding source for prevention efforts. As a result, CoCs may only use funding from the CoC Program for efforts at ending homelessness unless HUD has designated them as a High-Performing Community (HUD, 2012b). Additionally, HUD currently prioritizes the first federal goal, to end chronic homelessness, by calling upon CoCs to provide housing for this subpopulation first. HUD follows with the prioritization of the federal goal to end family homelessness (HUD, 2013d). In this way, HUD is incentivizing CoCs through the grant competition to strive to accomplish the goals of the federal government to end homelessness.

### **HPAC’s Approach to Preventing and Ending Homelessness**

Currently the HPAC operates under the goal of the federal government and HUD to prevent and end homelessness. In the Yolo County ten-year strategic plan, the title of

the document itself states this goal, *One Piece at a Time: Preventing and Ending Homelessness in Yolo County*. The document outlines four goals for the County in order to achieve this ten-year plan: prevention, housing, supportive services, and implementation. The County plans to accomplish these goals with six key steps that appear to touch on all the aspects of the federal government's own key steps, referred to as themes, shown in Table 2.2 (Yolo County, 2010). However, according to a 2014

*Table 2.2:*

Comparison of Yolo County's Action Steps to the Federal Government's Themes for their Ten-Year Plans to End Homelessness

<b>6 Action Steps of Yolo County's Ten-Year Plan to End Homelessness</b>	<b>5 Themes of the Federal Government's Ten-Year Plan to End Homelessness</b>
1. Create or assign a staff position to support plan implementation and move the plan forward.	1. Increase leadership, collaboration and civic engagement
2. Create and expand Housing Resource Centers in each City to improve system coordination, reduce duplication, and increase access to available services, housing, and homeless services. 3. Identify and access funding for extremely affordable permanent housing and services to access and maintain housing.	2. Increase access to stable and affordable housing
4. Make transportation assistance available to improve access to services and employment opportunities.	3. Increase economic security
5. Increase availability and access to mental health and substance use services.	4. Improve health and stability
6. Maximize use of the Homeless Management Information System (HMIS) to collect and analyze data on homelessness and program outcomes and to facilitate inter-agency case management and information sharing and to increase efficiency.	5. Retool the homeless crisis response system

Sources: Adapted from County of Yolo (2010) and USICH (2010).

assessment report by the County, the ten-year strategic plan suffers from a lack of leadership as well as vague goals that have made implementation of the plan difficult and created a lack of accountability (County of Yolo, 2014). The report does state changes in the leadership structure as of 2012 that resulted in Yolo County Housing leading the plan and the establishment of the Executive Committee as the sole overseeing body (County of Yolo, 2014). The HPAC is included as a member in this committee (County of Yolo, 2014) and pledged in their 2014 Strategic Plan and Governance Charter to provide assistance in the attainment of the goals of the ten-year strategic plan (HPAC, 2014f). Additionally, since HUD has not yet designated any High Performing Communities (HUD, 2013d), no CoC, including the HPAC, is currently eligible to utilize the grant funds for prevention efforts. As a result, the HPAC does not use any CoC funding for the prevention efforts they may assist in for the ten-year strategic plan.

### **Housing First**

The Housing First approach is a nationwide best practice for assisting in the reduction of the homeless population. This approach seeks to provide permanent housing as a primary form of aiding the homeless without the requirement of sobriety or rehabilitation classes (USICH, n.d.-d). Features of a Housing First approach include the provision of voluntary supportive services, the quick provision of housing, low barriers to entry, the full legal rights of a tenant, relaxed policies regarding lease violations and no program requirements prior to entry (HUD, 2014d). This approach is most commonly associated with the provision of permanent housing, which refers to both permanent supportive housing and rapid re-housing. A description of the different types of housing

for the homeless is provided in Table 2.3. Housing First differs from the more traditional method for addressing homelessness, which involved placing homeless in temporary shelters, either emergency shelters or transitional housing, with the requirement of completion of sobriety and/or the attainment of mental stability before placement in more permanent housing (Padgett et al., 2011; USICH, 2014). The theory is that homeless individuals are able to focus on the other issues that are barring them from stabilizing (Katel, 2014), such as gaining employment skills or obtaining a sober lifestyle. Ultimately, the research largely supports providing Housing First approaches as one of the most effective ways to both end homelessness and prevent it.

*Table 2.3:*

#### HUD's Definitions of Housing Types

<b>Type of Housing</b>	<b>Definition</b>
Permanent Housing	Community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid re-housing. To be permanent housing, the program participant must be the tenant on a lease for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause.
Permanent Supportive Housing	Permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.
Transitional Housing	Interim placement for persons or households who are not ready for or who do not have access to permanent housing. Opportunity for clients to gain the personal and financial stability needed to transition to and maintain permanent housing.
Rapid Re-housing	Rental assistance combined with supportive services aimed to help individuals and families attain and retain permanent housing with limited stays in homelessness.
Emergency Shelter	Any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless.

Sources: Adapted from HUD (n.d.-d, 2012b) and USICH (2013).

There is overwhelming support in the literature for the effectiveness of Housing First strategies. According to Padgett et al. (2011) many studies have found the provision

of permanent supportive housing as more effective in ensuring “residential stability” than the traditional approach of providing temporary housing with requirements of sobriety or mental stability, referred to as “Treatment First”. The researchers conducted a longitudinal qualitative study of homeless individuals and found that those who used Treatment First methods were 3.2 times more likely to use substances than those in Housing First programs even though they were attending treatment more. With the onset of the federal government’s ten-year plan, the subsequent reduction in homelessness has been cited by many as evidence of the effectiveness of various Housing First strategies as well (Donovan & Shinseki, 2013; O’Toole, Pape, & Kane, 2013). From 2013 to 2014, a 2% reduction occurred in the homeless population according to PIT Count data (HUD, 2014g). O’Toole et al. (2013) discussed the significant reduction in homelessness among the veteran population since the implementation of the strategic ten-year plan; a reduction of 33% since the plans implementation in 2010 (HUD, 2014g). O’Toole et al. credits in part the approach of permanent supportive housing as well as efforts to increase access to health care and jobs.

While providing housing through the Housing First approach can be expensive, much research has found it to be effective in reducing the costs that homeless individuals place on public services (Culhane, Metraux, & Hadley, 2002; Larimer et al., 2009). Homelessness specifically places a high burden on public services for health care (Sadowski, Kee, VanderWeele, & Buchanan, 2009), incarceration, and shelters (USICH, 2010), especially for those who are chronically homeless (Caton, 2007; Culhane et al., 2002; Larimer et al., 2009). For example, a study by Culhane et al. (2002) utilized

regression analysis of data on 4,678 homeless individuals placed in permanent supportive housing in New York City. They found a reduction among those individuals in the use of public services such as hospitals, shelters, and correctional facilities. Together they estimated \$16,281 per year, measured in 1999 dollars, for each housing unit in reduced public service costs. While the researchers found the cost of providing permanent supportive housing units to be slightly higher than the reduction in public service costs (Culhane et al., 2002), the effectiveness of the reduction in services is still notable.

A 2009 study in Seattle, Washington found similar results in the reduction of public services with the use of Housing First strategies. Although the study was a smaller sample size (N=134), it found the costs of Housing First and the reduction in cost of public services to be about the same (Larimer et al., 2009). As suggested by Henwood, Cabassa, Craig, and Padgett (2013), reductions in public service costs due to permanent supportive housing may result from the potential health benefits that having a stable living situation could provide to formerly homeless individuals. However, Culhane et al. (2013) warns that the cost effectiveness of Housing First cannot be the same for every community and therefore calls for greater research regarding the benefits of such an approach.

### **HUD's Approach to Housing First**

HUD supports and encourages the use of Housing First along with the federal government. In the federal government's 2010 *Opening Doors* plan, there is an emphasis on using Housing First strategies (USICH, 2010). HUD also emphasizes this approach in a couple ways. First, HUD scores CoC's in the grant program on whether or not they use



Housing First in the provision of their permanent housing (HUD, 2013d). Secondly, HUD prioritizes permanent housing projects for funding, the very type of housing required for the Housing First approach. They prioritize permanent housing projects for funding over all other types of housing and over the provision of supportive services (HUD, 2013d).

### **HPAC's Approach to Housing First**

The HPAC is striving to operate with Housing First strategies. According to the HPAC's application for CoC Program grant funds, all of their permanent housing projects utilize the Housing First approach (HPAC, 2014a). However, the HPAC described in their application that the limited number of beds in their permanent housing projects sometimes necessitate placing homeless in transitional housing. Additionally, the HPAC prioritized permanent supportive housing projects over all other types of housing and over supportive service projects in 2013, in line with HUD's priority (HPAC, 2014a). Therefore, the HPAC appears to utilize a Housing First approach but the limited number of permanent housing beds available in their region hinders their full compliance.

### **Provision of "Just Enough" Assistance**

The provision of "just enough" assistance is described by the National Alliance to End Homelessness as a proven effective practice for reducing homelessness (National Alliance to End Homelessness, 2014). Essentially, this term refers to communities carefully targeting housing assistance to homeless in accordance with their needs. Rather than providing the same service of housing to all homeless, some require only temporary minimal assistance, like a rent subsidy, while others need long-term intensive care, such

as permanent housing for the chronically homeless (National Alliance to End Homelessness, 2014). By providing “just enough” assistance, communities can use resources more efficiently to stabilize homeless in housing, without exceeding their needs (National Alliance to End Homelessness, 2014). To perform this practice, service providers target homeless subpopulations for specific types of housing (see Table 2.4). This is an important aspect of homelessness policy as one of the themes of the federal government’s 2010 *Opening Doors* plan is to retool the Homeless Crisis Response System. Essentially, this is a call for an improved system of linking individuals with the appropriate level of assistance for their specific needs (USICH, 2010). The main types of housing for this approach are the permanent housing models of permanent supportive housing and rapid re-housing (National Alliance to End Homelessness, 2014).

*Table 2.4:*

The Homeless Subpopulation Targeted for Each Housing Type

<b>Type of Housing</b>	<b>Homeless Subpopulation</b>
Permanent Housing	All homeless subpopulations
Permanent Supportive Housing	Chronically homeless individuals and families with disabilities including mental illness, chronic substance abuse, physical disabilities or AIDs and related diseases
Transitional Housing	All homeless subpopulation, especially unaccompanied youth and individuals with substance abuse or who are domestic violence victims
Rapid Re-housing	Homeless individuals or families
Emergency Shelter	All homeless subpopulations

Source: Adapted from USICH (2013).

While the research is limited, permanent supportive housing and rapid re-housing models for specific subpopulations appear cost effective and successful in reducing homelessness based on program results. When it comes to permanent supportive

housing, this method has shown success in serving the chronic homeless subpopulation. A study by Moulton (2013) analyzed data from communities across the United States for 2005 through 2007. He found the use of permanent supportive housing for the chronically homeless subpopulation to be effective in reducing that population. He also estimated the first year cost of placing a chronically homeless individual into permanent supportive housing at \$55,600 in comparison to the \$40,000-\$50,000 that the chronic homeless cost the public in services, such as healthcare or incarceration, when not housed. He noted that the costs for permanent supportive housing likely decrease after the first year due to initial startup costs, increasing the potential for provision of this housing type to the chronically homeless to be cost effective (Moulton, 2013). Similarly, the Pathways to Housing program in New York saw success in targeting unsheltered chronic homeless for permanent supportive housing. A study examined individuals in the program from January 1993 to September 1997 and found that 88% of those in the Pathways program were still housed after 5 years compared to the 47% still housed in the residential treatment program in the city (Tsemberis & Eisenberg, 2000).

The rapid re-housing model has proven effective in reducing homelessness in various CoCs as well for individual and family subpopulations. Rapid re-housing is a method of quickly transitioning homeless individuals or families into permanent housing by providing, through individual case management, various forms of assistance: such as financial assistance for rent and move in costs, help with housing searches, and negotiations with landlords. The intent is to provide temporary help to those in need of

quick assistance in order to stabilize them in housing, thereby allowing shelter space to free up (USICH, n.d.-e).

While large evaluations have not yet occurred, several communities have implemented rapid re-housing programs, such as Boston, Minneapolis, and Columbus (USICH, n.d.-e). Data from programs such as these show quick housing placement and few returns to homelessness (National Alliance to End Homelessness, 2014). Home Free in Portland Oregon altered their approach regarding homeless families of domestic violence from service provision in emergency shelter and transitional housing to rapid re-housing assistance through “mobile service” out in the community. The program allows participants to design their own plan from services such as motel vouchers, rental housing assistance, support group services, and property owner negotiations. The Home Free program increased the number of families that received services by four times its prior shelter-focused service strategy and, in FY 2010-2011, 97% of families in the program were still housed a year after leaving the program (USICH, n.d.-c.). Their success is due in part to the outreach design of the program that allows for the reaching of more families of domestic violence, as only a small percent of survivors reach out to shelter providers (USICH, n.d.-c.). Programs like this allow for more tailored attention to specific subpopulations of homeless to meet their needs.

### **HUD’s Approach to “Just Enough” Assistance**

HUD seeks to implement this best practice through effective targeting of homeless subpopulations to the amount of services they need. As of 2012, HUD requires CoCs to establish a Centralized or Coordinated Assessment System (HUD, 2012b). More

recently referred to by HUD as a Coordinated Entry System (HUD, 2015a), it is supposed to be a community-wide efficient system that connects homeless people with the services or housing they need more quickly, no matter where they access a service. The idea is that wait times to receive such services are reduced, people receive prioritization based on their needs, and that any “gaps” in service provision are illuminated (HUD, 2015a). To ensure that CoC’s are meeting this requirement, HUD scores their use of the system in the grant competition. Similarly, HUD also scores CoCs for prioritizing the chronically homeless for permanent housing and families for rapid re-housing (HUD, 2013d). In this way, these populations receive services that match their needs and HUD furthers its achievement of the timeline goals of the *Opening Doors* plan in ending homelessness for those subpopulations.

### **HPAC’s Approach to “Just Enough” Assistance**

The HPAC does not appear to meet the Centralized or Coordinated Assessment System requirement but is targeting subpopulations for housing types that best fit their needs. The HPAC is working to establish a Centralized or Coordinated Assessment System for their geographic region. They stated in their FY 2013 grant application that the system was in the process of being updated. However, their Strategic Plan and Governance Charter, dated for 2014, stated their intent to develop a system (HPAC, 2014f). Either way, the HPAC does not appear to have a fully functioning Centralized or Coordinated Assessment System. Nonetheless, they do appear to target and prioritize certain subpopulations for housing. The chronic homeless are the first prioritized for permanent supportive housing with a housing project specified for chronically homeless

individuals and another for chronically homeless families. Additionally, the HPAC prioritizes families with children in rapid re-housing projects, funded through the HUD Emergency Solutions Grant, as well as in their transitional housing projects (HPAC, 2014a). Unaccompanied youth, from 18 to 24 years of age, commonly discharged from foster services; also receive prioritization in transitional housing (HPAC, 2014a).

### **Strategic Local Response**

While the literature regarding intervention strategies for homelessness, through housing or service provision, is abundant, literature on implementing those strategies is limited. Despite the limited research, the government promotes a strategic local response. The federal government has stated that homeless intervention strategies should be a collaborative approach with heavy local government and community involvement. This is seen in their 2010 *Opening Doors* plan to prevent and end homelessness where it includes “leadership, collaboration and civic engagement” as one of its main themes (USICH, 2010). HUD passes these requirements of a strategic local response on to state and local governments in part by the requirements of federal grants from HUD to obtain funding for homeless programs. Ultimately, many states and local communities have joined with the federal government’s goal of preventing and ending homelessness (Burt & Spellman, 2007). With few guidelines from research on implementing strategies to combat homelessness, there appears to be a general focus on collaboration, leadership, and data collection that support the government’s approach of a strategic local response.

## **Collaboration**

One of the main topics discussed for the implementation of strategies to combat homelessness is the necessity for collaboration. The federal government stresses the importance of collaboration at all levels of government as well as with public agencies. It also stresses that strategic plans be based on local needs (USICH, 2010). This collaboration at the local level is a requirement for HUD's CoC grant and, according to a 2002 HUD report, the requirement has enhanced communication among service providers and improved the provision of homeless services (HUD, 2002). Burt and Spellman (2007) support this approach in their literature review regarding what they refer to as "system change" for communities to prevent and end homelessness. While the authors were able to provide recommendations on implementation practices, they noted that the lack of available research restricted the ability for best practice claims. Through their research, Burt and Spellman (2007) described how all agencies and relevant parties should be involved in addressing homelessness for the community through an integrated system. They discussed prior research that detailed five integration stages moving from isolation to the eventual achievement of a "coordinated community response". Burt et al. (2005) also affirmed this idea in their examination of effective prevention strategies among six communities, listing collaboration among the community as one of the key factors of efficiently preventing and ending homelessness.

## **Leadership**

In addition to collaboration, research also points to leadership as effective in implementing strategies to end homelessness. In their 2010 ten-year plan the federal

government called for leadership at all levels of government to implement plans to prevent and end homelessness based on local needs (USICH, 2010). The research performed by Burt et al. (2005) supports this leadership implementation strategy. The authors describe how leadership, made up of leaders of agencies and government, must exist to coordinate and develop a strategic plan to combat homelessness countywide. This is necessary to ensure that someone is in charge of implementing the strategy (Burt et al., 2005). Burt and Spellman (2007) detailed how the success of “system change” will be greater with the establishment of a leadership that can be structured in almost any form as long as it works for the community it is representing. The authors go so far as to suggest the assigning of a “coordinator role” to one or more individuals to manage the implementation strategy for homelessness.

### **Data Collection**

Lastly, the literature discusses data collection as beneficial in implementing strategies to prevent and end homelessness. Burt et al. (2005) stressed the importance of data collection in order to document and measure efficiency of performance of programs in addressing homelessness. They further described how having one data collection system for all agencies in a community can help increase the efficiency in targeting appropriate services and keeping track of homeless individuals. Despite the importance, Burt et al (2005) found that very few communities, as of 2005, were collecting data in this way. Burt and Spellman (2007) also described the importance of data collection to help in the implementation of homeless strategy and for building support for the effort amongst the community. In this way, researchers argue that data collection helps



implementation efforts by building public support and by ensuring that programs are efficient.

### **HUD's Approach to a Strategic Local Response**

The purpose and design of the HUD CoC Program is to encourage a strategic local response that is collaborative, has leadership, and is data driven. CoCs are greatly encouraged by HUD to collaborate with all levels of government and service providers to aid in the achievement of preventing and ending homelessness. Specifically, the CoC Program requires local communities to collaborate and formulate a plan to prevent and end homelessness in their areas. It is a job of the CoC to plan and develop a coordinated system to meet the needs of the homeless in their region (HUD, 2012b). To accomplish this HUD requires CoCs to have a governance charter, perform an annual gaps analysis of homeless services in their region, provide information to assist in the development of a Consolidated Plan for their region, and conduct at least a biennial PIT Count (HUD, 2012b). Additionally, CoCs are required to collect data through a Homeless Management Information System (HMIS). This system allows for the collection of client level data of the homeless population and services in the area. This data can aid the CoC in its planning efforts and help in measuring the performance of the CoC and its projects against HUD's goals to prevent and end homelessness (HUD, 2012a). HUD even scores CoCs based on their planning efforts and use of the Homeless Management Information System (HUD, 2013d). In this way, HUD incentivizes CoCs to develop a strategic response to homelessness.

### **HPAC's Approach to a Strategic Local Response**

The HPAC is in charge of the strategic local response for the region for which it presides. The HPAC has a 2014 Strategic Plan and Governance Charter for their CoC. This document lists the mission of the HPAC to serve as a leader regarding issues of homelessness and poverty in their geographic region (HPAC, 2014f). The strategic plan matches HUDs requirements for coordination, planning, and data collection. The document includes plans to set performance targets, collaborate with service providers and Emergency Grant Solutions recipients, conduct annual gaps assessments, conduct biennial PIT Counts, and assist local governments by giving them information for their Consolidated Plans (HPAC, 2014f). The strategy also states the plan to establish and use a Homeless Management Information System (HPAC, 2014f). At the time of the FY 2013-FY 2014 grant competition, the HPAC stated that they were in the process of switching to a new Homeless Management Information System provider (HPAC, 2014a). Therefore, the HPAC should currently be operating under a new data system (HPAC, n.d.-b.). Additionally, the HPAC provides a funding strategy in their strategic plan that includes a call for collaborative efforts for obtaining and spending funds for the CoC (HPAC, 2014f).

### **Conclusion**

In an effort to attain the federal goal of preventing and ending homelessness, three best practice strategies have emerged. These strategies include Housing First, provision of “just enough” assistance, and a strategic local response. To meet the goals of the federal government, HUD encourages the use of these best practices in the CoC Program

by scoring CoCs on their adherence and use of these practices. The HPAC appears to be aware of these best practices and is aligning themselves with the concepts, especially with regard to Housing First through permanent supportive housing.

Despite this apparent compliance with best practices, the HPAC's scores in the grant competition have still been below the national average. Since HUD does not provide CoCs with an explanation regarding the scores they received, the HPAC has limited information for determining how to improve their scores. Therefore, I conduct an analysis of the HPAC's grant application responses and the scoring criteria of the CoC Program to determine deficiencies that resulted in their reduced scores.

## Chapter Three

### GRANT PROCESS

Over the past few years, the scoring criteria by which HUD measures the CoC Program grant applications have changed significantly. This is a result of the enactment of new laws and regulations regarding the grant program that have sought to increase its efficiency and improve its results. For the past two scoring rounds, the Yolo County Homeless and Poverty Action Coalition (HPAC) has received application scores below the national average. Since the grant is a competitive program, the scores that CoCs receive ultimately determine whether their homeless service projects receive funding. A high score is desirable to ensure that a CoC receives funding because HUD ranks and funds CoCs in order of their score. In order to ensure that the HPAC continues to receive funding for all of its current homeless service projects and to potentially obtain funding for bonus projects in the future, an increase scored on their application is necessary.

While the literature review examined the best practices that inform the CoC Program grant, the purpose of this chapter is to detail the process of the program for FY 2013-FY 2014. I begin with a description of the change in the CoC Program policies and priorities since its inception. Then I provide an explanation of the application process of the grant program as instituted by the 2012 Interim Rule and the FY 2013-FY 2014 Notice of Funding Availability (NOFA).

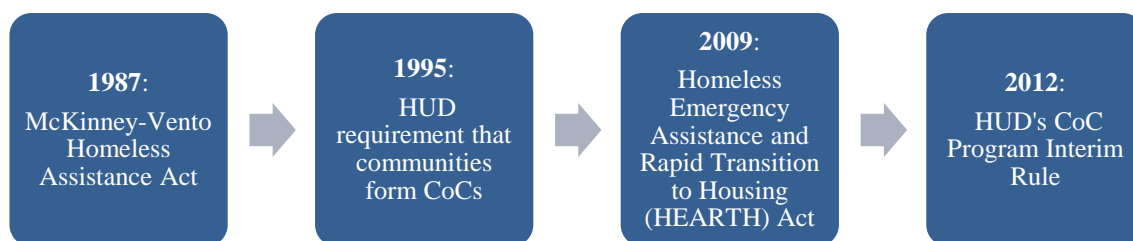
#### **Progression and Priorities of the CoC Program**

The structure of the CoC Program is reflective of the changes brought about by new laws and regulations since 2009. The grant itself began with the authorization for

federal funding for homeless services through the McKinney-Vento Homeless Assistance Act in 1987 (see Figure 4). Originally, HUD provided funding for three separate programs authorized by the act through a competition that, since 1995, required communities to form CoCs and submit an application (HUD, 2012c). However, this program structure changed significantly in 2009 with the enactment of the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH), which amended the prior Act. The HEARTH Act combined the three separate grant programs into one grant under the CoC Program, “codified” the existing CoC process into law, and required that HUD release formal regulations regarding the program (HUD, 2012b). Through this law, the federal government sought to create greater coordination in the administration of homeless services in order to increase efficiency (HUD, 2012b).

*Figure 4:*

Significant Changes in the CoC Program since its Inception



These consolidations took effect in 2012, when HUD released the Interim Rule. This document announced the formal regulations for the new CoC Program and now serves as the guiding document for the program. These regulations focused on better collaboration between CoCs and the HUD Emergency Solutions Grant recipients in their jurisdiction as well as implementation of new practices such as rapid re-housing, a

Coordinated or Centralized Assessment System, performance measures, and greater attainment of mainstream services for the homeless (HUD, 2012b).

While the CoC Program has changed through the years, three main priorities have remained consistent: permanent housing, the chronically homeless, and strategic local response. Permanent housing has long been a priority of HUD. In fact, according to HUD, the funding authorized under the McKinney-Vento Act was “originally intended” to provide funding for permanent housing for homeless people with disabilities (HUD, 2009). Maintenance of this priority has occurred in several ways such as a mandate by Congress since 1999 that 30% of the grant funds go towards permanent housing (HUD, 2009). In some of its competition years, HUD has also awarded funding bonuses to CoCs for new permanent housing projects and for CoCs that request more funds for housing services rather than just supportive services (HUD, 2009). Additionally, the chronic homeless have long been a priority of HUD for at least as far back as 2003 (HUD, 2007) and is the subpopulation often encouraged by HUD to be the target for the provision of permanent housing. HUD has called on CoCs to develop strategies for ending chronic homelessness (HUD, 2009) and awards points for such efforts in its scoring criteria (HUD, 2013d).

As discussed in Chapter Two, efforts at a strategic local response have been a consistent priority of the CoC Program as well. The main purpose of requiring CoCs to form is so that greater collaboration and strategic planning can occur at the local level (HUD, 2009). Since at least FY 2006, HUD has scored CoCs on their strategic planning for ending homelessness, their coordination, and their prioritization of projects. They

have also scored CoCs regarding their achievement in meeting national performance measures, like the reduction of the chronic homeless population (HUD, 2006a). To improve planning and performance measurement HUD also requires data collection through a Homeless Management Information System. It is viewed by HUD as an important tool for local CoCs to determine areas for improvement (HUD, 2009) and is included in the grant scoring criteria.

### **Process of the CoC Program Grant**

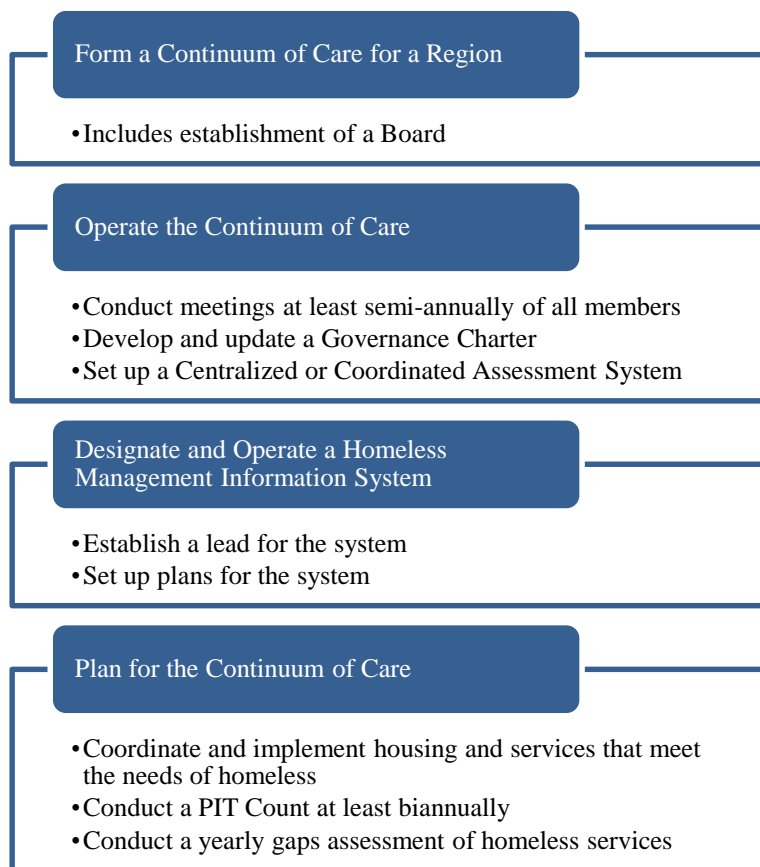
For the remainder of this chapter, explanation regarding the CoC Program will be in reference to its present regulations as brought about by the 2012 Interim Rule and FY 2013-FY 2014 CoC Program Notice of Funding Availability (NOFA). In describing the process of the grant, I begin with the requirements for CoCs and then detail funding, the application, and scoring.

### **Basic Requirements of a CoC**

To participate in the grant competition, HUD has specific requirements for CoCs. While the Interim Rule contains many requirements, some of the basics are displayed in Figure 5. Principally, a CoC must form for a specific region made up of organizations in that region. This includes the establishment of a board comprised of members from applicable organizations in the area and include an individual who is or used to be homeless (HUD, 2012b).

Figure 5:

Basic Requirements for a CoC



Source: Adapted from HUD (2012b).

Additionally, the Interim Rule states three main responsibilities for a CoC. First, the CoC is to perform the operations, essentially the management, for the CoC. This responsibility includes conducting biannual meetings of all members, setting up a Governance Charter, and instituting a Centralized or Coordinated Assessment System to aid in the intake and placement of homeless people in the geographic area (HUD, 2012b). Second, the CoC is to utilize a Homeless Management Information System to collect homeless data for the region. To set up this system the CoC must create security, data



quality, and privacy plans for its usage as well as assign a person to oversee it (HUD, 2012b). Third, a CoC must establish plans for its operations. This includes the provision of adequate services to meet the needs of its homeless, a PIT Count at a minimum of every two years, and a yearly assessment of homeless services in the region to identify potential gaps (HUD, 2012b). In addition to all of these requirements, the CoC is also in charge of organizing the application for the HUD CoC grant funds (HUD, 2012b).

### **Funding**

The amount of funding that a CoC can receive is restricted and is determined through a careful process. Every year, prior to the release of the Notice of Funding Availability (NOFA), HUD announces the amount of funding that each CoC is entitled to receive based on the estimated needs of the geographic area they represent, known as the Preliminary Pro Rata Need. However, HUD also takes into account the total amount of funding needed to renew all of the eligible projects for that fiscal year in the geographic area of the CoC, referred to as the Annual Renewal Demand (HUD, 2013d). The higher amount of either the Preliminary Pro Rata Need or the Annual Renewal Demand for a CoC is its Final Pro Rata Need. Any additional costs, such as CoC Planning, adjustments in the value of Fair Market Rents, and potential bonus funding offered in the fiscal year competition, are added to the CoCs Final Pro Rata Need. This adjusted Final Pro Rata Need is the maximum amount of funding the CoC can receive from the grant (HUD, 2012b). Therefore, the only way that a CoC can increase its funding, is to keep its Annual Renewal Demand high and potentially increase it through any bonus project funding made available by HUD.

It should be noted that in FY 2014, the bonus project allowed by HUD had a separate scoring criteria, with a CoC's score on only those criteria determining whether they would receive funding for the bonus project in question (HUD, 2014e). It is possible that this is how HUD may fund bonus projects in the future, thereby leaving CoCs without a bonus project mechanism to increase their Annual Renewal Demand through the regular CoC Application Score.

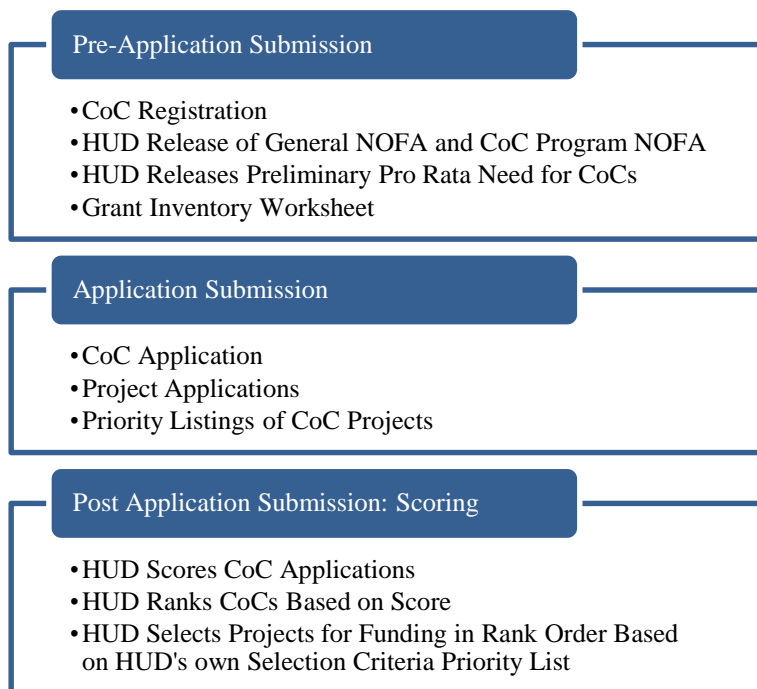
Additionally, only specific projects and activities may be funded through the CoC Program. Under the 2012 Interim Rule only five types of projects may be funded: transitional housing, supportive services without the provision of housing, the Homeless Management Information System, prevention services, and permanent housing, which is specified as permanent supportive housing for homeless with disabilities or rapid re-housing (HUD, 2012b). In the grant program only CoCs that have been designated High-Performing Communities for a given year may use CoC grant funds for homeless prevention services. As of the most recent FY 2013-FY 2014 scoring round, HUD had not yet designated any High-Performing Communities due to a lack of the required data, but they will in future competitions (HUD, 2013d). Also only certain activities under the five types of projects are eligible for funding. This includes costs for CoC planning, administrative costs for projects, leasing, new construction, supportive services, reallocation, the Homeless Management Information System, operating costs, acquisition or rehabilitation of property, and indirect costs (HUD, 2012b).

## Application Process

The Notice of Funding Availability (NOFA) for the FY 2013- FY 2014 CoC Program competition provides guidelines regarding the application and scoring process. The basic requirements for this process are shown in Figure 6.

*Figure 6:*

### General Application Process for the CoC Program



Source: Adapted from HUD (2013d).

**Pre-application submission.** Prior to the filing of an application for the grant competition, a CoC must first register with HUD (HUD, 2013b). Next, HUD releases two NOFA's for a given fiscal year, a General NOFA for all of its grant programs and one that is specific for the CoC Program. These documents set the application rules, priorities, scoring criteria, and submission deadlines for the CoC Program competition as well as announce the funding available for the entire program (HUD, 2012b). At some point

prior to the application submission deadline, HUD releases the Preliminary Pro-Rata Need amounts for each CoC. Additionally, CoCs submit a preliminary list to HUD for approval of their total anticipated project Annual Renewal Demand, known as the Grants Inventory Worksheet (HUD, 2013b). Both of these forms help HUD to determine the amount of funding available for CoCs nationwide and for individual CoCs to begin to determine the maximum amount of funding they may request for projects in their region.

**Application submission.** Around two months after the publishing of the CoC Program NOFA, CoCs submit electronically a three-part Consolidated Application made up of the CoC Application, Project Applications and the Priority Listings. The CoC Application is the main application for the CoC and is the portion of the submitted application that receives a score from HUD. The purpose of this application and the documents it includes is to give HUD an idea as to the strategic plan of the CoC, its form, and its performance (HUD, 2013d). Similarly, the Project Applications, though not scored, give HUD an understanding as to the specifics of each project that is requesting funding (HUD, 2013d). In this way, HUD can ensure that the projects and those administering the projects meet the eligibility and quality standards of the NOFA.

The Priority Listings is the portion of a CoC's application where projects requesting a renewal of funding, or new projects requesting funding, are ranked in order of priority using a two-tiered structure. As of the FY 2012 NOFA, the two-tier structure was new to the Priority Listings. The purpose of this structure is to allow CoCs to have more control over which projects receive priority funding (HUD, 2012d). In Tier 1 CoCs prioritize project requests for funding up to the amount of the Annual Renewal Demand

pre-approved by HUD. If HUD estimates the Annual Renewal Demand of all CoCs nationwide to exceed the available funding, then they will announce in the NOFA a percentage reduction that all CoCs must reduce their Annual Renewal Demand by in Tier 1 (HUD, 2012d). In Tier 2 CoCs can prioritize other projects up to the amount of their Final Pro Rata Need of funding as well as any additional CoC planning or possible bonus projects allowed by HUD in the NOFA (HUD, 2012d). However, as previously stated, an exception to this occurred in the most recent grant-funding year, FY 2014. In this fiscal year HUD allowed funding for a bonus project based on separate scoring criteria and required that the project be excluded from the Tiers (HUD, 2014e). This could potentially become the norm for bonus projects in the future. Lastly, to ensure fairness, the CoC must prioritize and rank these projects in accordance with a public process (HUD, 2013d).

**Post application submission: scoring.** The score that a CoC receives is used to rank it against other CoCs and ultimately determines how many projects will receive funding. The only portion of the application that receives a score is the CoC Application. HUD gives this score through a comparison of the application to a list of scoring criteria detailed in the NOFA every fiscal year (HUD, 2013d). Once the scores are assigned, the CoCs are ranked in order of score.

HUD uses the ranked list of CoCs to select projects for funding through a detailed process. For this process, HUD examines each CoC's two-tiered Priority List against HUD's project selection criteria stated in the NOFA for that year (HUD, 2013d). As illustrated in Figure 7, HUD will examine the project requests for each CoC in order

of their score and select projects from Tier 1 that match HUD's first selection criteria, even if the project chosen is ranked lower by the CoC than another project type. HUD will repeat this process through their entire selection criteria list until all CoCs' Tier 1 projects receive funding. If HUD still has remaining grant funds to disperse, due to recapture of funds from programs or remaining funds from prior years, then it will repeat this process working through its selection criteria list with all CoCs' Tier 2 projects until the grant funding runs out. Therefore, the higher the score a CoC receives the more likely it is to get projects funded out of its Tier 2 (HUD, 2013d).

*Figure 7:*

Example of HUD's Project Selection Process Using their Selection Criteria and CoC's Priority Listings

<p><b><u>CoC A Project Listing (Score of 150)</u></b>  <b>Project 1: Renewal PSH</b>  <b>Project 2: Renewal TH</b>  <b>Project 3: RRH Reallocated for Families</b>  <b>Project 4: CoC Planning (End of Tier 1)</b>  <b>Project 5: Renewal PSH</b>  <b>Project 6: Renewal RRH</b>  Project 7: Renewal TH</p>	<p><b><u>CoC B Project Listing (Score of 100)</u></b>  <b>Project 1: Renewal PSH</b>  <b>Project 2: Renewal PSH</b>  <b>Project 3: PSH Reallocated for CH</b>  <b>Project 4: Renewal TH (End of Tier 1)</b>  Project 5: Renewal RRH</p>
<p><b><u>HUD's Selection Criteria</u></b>  Renewal PSH/RRH  PSH Reallocated for CH  RRH Reallocated for Families  Renewal TH  CoC Planning  <b>End of Tier 1</b>  Renewal PSH/RRH  <b>End of Funding</b></p>	<p><b><u>Color Key:</u></b>  <b>T1: First Selection is red</b>  <b>T1: Second Selection is blue</b>  <b>T1: Third Selection is green</b>  <b>T1: Fourth Selection is orange</b>  <b>T1: Fifth Selection is purple</b>    <b>T2: First Selection is pink</b></p>

Note: Permanent Supportive Housing (PSH); Rapid Re-Housing (RRH); Transitional Housing (TH); Chronically Homeless (CH)

Source: Adapted from HUD (2013c).

### **Project Threshold and Quality Requirements**

It is notable to mention that project threshold and quality requirements exist in the competition as well. Outside of the review given for a CoC Application, from which a score is received, a separate review occurs for each individual project applicant and project application in the CoC (HUD, 2013d). Before awarding funding to a project in a CoC, it must meet basic threshold and quality requirements of the Interim Rule and NOFA for that fiscal year.

Since this thesis will be examining the CoC Application score of the HPAC, the specific projects of the HPAC in comparison to the eligibility and quality threshold requirements will not be examined.

### **Conclusion**

The CoC Program has changed significantly since 2012. The program itself has consolidated and the competition has new scoring criteria as well as a required prioritization of projects. The score that a CoC receives on their CoC Application determines their ranking against all other CoCs and ultimately determines which projects receive funding. A higher score benefits a CoC because it ensures them greater ranking against other CoCs, thus providing them better assurance that all of their projects will receive funding. Additionally, if HUD allows bonus projects in a competition year, a higher score presents the opportunity for a CoC to potentially increase their funding through attainment of a bonus project that increases their Annual Renewal Demand.

## Chapter Four

### SCORING CRITERIA

For this thesis, I analyze the application responses of the HPAC in comparison to the requirements of the CoC Program scoring criteria for FY 2013-FY 2014. In this chapter specifically, I provide a detailed description of the scoring criteria against which I will compare and analyze the HPAC application. Finally, I end with a discussion of the methodology that I will utilize to conduct the analysis.

#### **Scoring Criteria for the CoC Program**

For this thesis, I analyze the scoring criteria and potential points possible for the CoC Program competition, as specified by the NOFA for FY 2013-FY 2014. I utilize this fiscal year since it is the most recent scoring round, making it the best prediction for future scoring criteria, and because it differed considerably from the FY 2012 scoring criteria. Specifically, the FY 2013-FY 2014 NOFA combines two of the FY 2012 criteria and adds two new ones. Additionally, the maximum points possible, excluding bonus points, increased from 130 to 150 (HUD, 2012d, 2013d). The FY 2013-FY 2014 round is also unique because for the first time the application score given to CoCs for the application submitted in FY 2013 would apply for two rounds of funding: FY 2013 and FY 2014 (HUD, 2013d).

The NOFA for FY 2013-FY 2014 specifies seven categories totaling 150 points with an additional 6 bonus points (HUD, 2013d), see Table 4.1. The NOFA also breaks down the maximum points possible for each of the seven categories with a list of criteria (HUD, 2013d). However, when CoCs receive their scores from HUD, only the score



received for each category is given, not the criteria, and no description is provided that explains why a CoC received their particular scores (HUD, n.d.-b). Since HUD does not provide explanations regarding the scores given, the criteria help to provide a further breakdown of their scoring expectations.

*Table 4.1:*

FY 2013-FY 2014 CoC Program Competition Scoring Categories and Maximum Points Possible

<b>FY 2013-FY 2014 Scoring Categories</b>	<b>Maximum Points Possible</b>
<i>CoC Strategic Planning and Performance</i>	69
<i>CoC Coordination of Housing and Services</i>	28
<i>Recipient Performance</i>	15
<i>CoC Housing, Services, and Structure</i>	13
<i>Leveraging</i>	5
<i>Homeless Management Information System</i>	11
<i>Point-in-Time Count</i>	9
<b>Maximum Total Score</b>	<b>150</b>
<i>Bonus Points</i>	6
<b>Maximum Total Score with Bonus Points</b>	<b>156</b>

Sources: Adapted from HUD (n.d.-b).

### **Scoring Categories and their Criteria**

In order to provide context to the expectations that HUD has for CoCs, I detail each of the seven scoring categories and provide descriptions of their criteria. I discuss each of the categories separately beginning with a table listing the criteria for each category. The criteria descriptions in the tables are the ones provided by HUD in the FY 2013- FY 2014 NOFA.

**CoC Strategic Planning and Performance.** The CoC Strategic Planning and Performance category is a combination of two categories from the FY 2012 NOFA (HUD, 2012d) and was therefore new to the competition. The focus of this category is on evaluating a CoC’s strategic plan and actual performance with regard to decreasing homelessness and the rate at which it reoccurs in their community (HUD, 2013d). This category is important to HUD as evidenced by the 69 possible points assigned to it, more than double the points of any other category.

*Table 4.2:*

Description of the Scoring Criteria and the Maximum Points Possible for the CoC Strategic Planning and Performance Category

<b>CoC Strategic Planning and Performance: 69 Maximum Points Possible for the Category</b>	
<b>16 Points Possible</b>	<b>Ending Chronic Homelessness</b>
The efforts of a CoC to reach the goal of ending chronic homelessness by 2015.” Five measures evaluated: 1) “3 points for CoCs that increased the total number of [permanent supportive housing] beds dedicated for use by the chronically homeless as reported in the FY 2012 CoC Application. 2) 2 points for CoCs that demonstrate and commit to a continued increase in the total number of [permanent supportive housing] beds dedicated for use by the chronically homeless in 2014 and 2015. 3) 2 points for CoCs that demonstrate they are currently prioritizing the chronically homeless in at least 30% [ideally 85%] of the existing [permanent supportive housing] units that are not dedicated to serving the chronically homeless in the CoC, and that are made available through turnover... 4) 5 points for CoCs that commit to increasing the percentage of turnover non-dedicated [permanent supportive housing] units in which the chronically homeless are prioritized or if the commitment rate identified in this CoC Program Competition is currently at 85 percent, the CoC must maintain the 85 percent prioritization rate in 2014 and 2015. 5) 4 points for CoCs that provide a clear description of the CoC’s plan between 2014 and 2015 to increase the number of [permanent supportive housing] beds available for the chronically homeless, and that outlines specific strategies and actions that CoC will take to achieve the goal of ending chronic homelessness by 2015.”	
<b>10 Points Possible</b>	<b>Housing Stability</b>
“[T]he extent to which [CoCs] demonstrate successful performance and further planning... [in] [a]chieving housing stability-the ability to obtain and maintain permanent supportive housing or permanent housing...for the homeless”. HUD evaluated progress in 3 ways: 1) “ 4 points for CoCs demonstrate for 2013 that least 80% of CoC Program participants remained in permanent supportive housing, or exited to another permanent housing destination... 2) 3 points for CoCs that indicate that they will increase the percentage of CoC Program participants who remained in or exited to permanent housing to at least 80% in 2014 and 2015... 3) 3 points for CoCs that provide	

a clear description of the CoC’s plan between 2014 and 2015 to improve the housing stability of participants in its CoC Program-funded projects, and that address the specific strategies and actions the CoC will take to meet the numeric achievements proposed for 2014 and 2015.”	
<b>8 Points Possible</b>	<b>Jobs and Income Growth</b>
“[T]he extent in which CoC Program-funded projects assist project participants to increase income...” Five measures evaluated: 1) “2 points for CoCs that clearly demonstrate that participants in all CoC Program-funded projects obtained employment income during program participation for all [Annual Performance Reviews] submitted to HUD between October 1, 2012, and September 30, 2013 [ideally 20% or more]... 2) 1 point for CoCs that clearly demonstrate that participants in all CoC Program-funded projects increased their income from sources other than employment for all [Annual Performance Reviews] submitted to HUD between October 1, 2012, and September 30, 2013 [ideally 54% or more]... 3) 1 point for CoCs that indicate they will increase (or maintain) the percentage of participants in CoC Program-funded projects who increase their income through employment in a given operating year to at least 20 percent in 2014 and 2015.... 4) 1 point for CoCs that indicate that they will increase (or maintain) the percentage of participants in CoC Program-funded projects who increase their income from sources other than employment in a given operating year to at least 54 percent in 2014 and 2015... 5) 3 points for CoCs that provide a clear description of the CoC’s plan between 2014 and 2015 to increase the percentage of project participants in all CoC Program-funded projects that increase their incomes from both employment and non-employment sources between.”	
<b>7 Points Possible</b>	<b>Mainstream Benefits</b>
“[T]he extent in which [a CoCs] CoC Program-funded projects assist project participants to obtain mainstream benefits...” Three measures evaluated: 1) “2 points for CoCs that demonstrate that participants in CoC Program funded projects increase their mainstream benefits during program participation [ideally at least 56%]... 2) 2 points for CoCs that indicate that they will increase (or maintain) the percentage of participants in CoC Program funded projects who increase their mainstream benefits in a given operating year in 2014 and 2015. In order to receive the full points, CoCs must either have a rate of at least 56 percent that is maintained, or show a numerical increase from 2013 to 2015... 3) 3 points for CoCs that provide a clear description of the CoC’s plan in 2014 and 2015 to increase the percentage of project participants in all CoC Program funded projects that obtain mainstream [benefits].”	
<b>10 Points Possible</b>	<b>Rapid Re-housing</b>
“[T]he extent in which [CoCs] are implementing a rapid re-housing model to reduce the number of homeless households with children.” Three measures evaluated: 1) “3 points for CoCs that plan to increase in the number of homeless households with children assisted through rapid re-housing programs between 2013 and 2015. 2) 3 points for CoCs that provide a clear description of how the CoC will increase the number of homeless households with children that are assisted with rapid re-housing (through the CoC Program, Emergency Solutions Grants program, or other sources), in 2014 and 2015, including specific strategies and actions the CoC will take to meet the numeric achievements being proposed... 3) 4 points to CoCs that provide a clear description of the written policies and procedures [for both the CoC Program and the Emergency Solutions Grant Program] for determining and prioritizing which eligible homeless households will receive rapid re-housing assistance, the amount or percentage of rent that each program participant must pay, how often the rapid re-housing projects contact and assess program participants residing in these projects, and whether the rapid re-housing project(s) follow-up with the program participants after assistance ends.”	
<b>3 Points Possible</b>	<b>Opening Doors</b>

“..CoCs that demonstrate how it is including the goals of <i>Opening Doors</i> in local plans established to prevent and end homelessness, including what steps the CoC is taking to assess existing barriers to entry and how they plan to remove them.”	
<b>4 Points Possible</b>	<b>Ending Family Homelessness</b>
“CoCs that demonstrate the efforts to reduce the number of homeless households with children, including an outreach plan to reach this population.”	
<b>2 Points Possible</b>	<b>Addressing the Needs of Victims of Domestic Violence</b>
“...CoCs that demonstrate current efforts to address the needs of victims of domestic violence, including their families, which include a clear description of services and safe housing from all funding sources that are available within the CoC to serve this population.”	
<b>2 Points Possible</b>	<b>Ending Youth Homelessness</b>
“...CoCs that demonstrate current efforts to address youth homelessness, including a clear description of services and housing from all funding sources that that are available within the CoC this population and the extent to which resources are available for all youth or only specific to youth between the ages of 16 to 17 or 18 to 24.”	
<b>3 Points Possible</b>	<b>Reaching Unsheltered Homeless</b>
“...CoCs that demonstrate efforts to identify and engage the homeless who routinely sleep on the streets or in other places not meant for human habitation, including the CoC’s outreach plan.”	
<b>4 Points Possible</b>	<b>Ending Veteran Homelessness</b>
“...CoCs that demonstrate the extent to which they are partnering or collaborating with HUD-VASH programs that are operating in the CoC’s geographic area. Additionally, CoCs should specifically describe how they are combating homelessness among veterans and their families, particularly those who are not eligible for homeless assistance through the U.S. Department of Veterans Affairs programs. In order to receive maximum points, CoCs must include a complete description of services and housing available for veterans from all funding sources.”	

Source: Adapted from HUD (2013d).

The criteria demonstrate HUD’s preferences regarding the type of homeless services provided as well as their goal that CoCs address all subpopulations of homeless. Specifically, the criteria show the importance placed on the planning for and provision of permanent housing, which includes both permanent supportive housing and rapid re-housing. This is evident in the 10 points given, the second highest amount of points possible in the category, for both the criteria of housing stability in permanent housing and of rapid re-housing. The criteria also show HUD’s concern that CoCs assist homeless

in obtaining income as well as mainstream benefits for which they are eligible (HUD, 2013d).

HUD shows a concern that CoC's address various subpopulations of homeless in their region as well. This includes the subpopulations of youth, domestic violence victims, and unsheltered homeless. However, HUD gives the highest amount of points among the subpopulation criteria to the chronic homeless followed by families with children and veterans. These three criteria seek to examine the efforts of a CoC in actually ending homelessness for these subpopulations in line with the goals of the federal *Opening Doors* plan. These goals have specific timelines and HUD seeks to assist in their achievement, even having a criterion that scores a CoC on whether their local plans include these goals. However, HUD gives the greatest weight to ending chronic homelessness, which has the largest points possible out of any other criteria at 16 points. This makes logical sense as the goal of ending chronic homelessness has the soonest achievement date of 2015 (USICH, 2010). Overall, performance and planning with regard to ending chronic homelessness, providing housing stability in permanent housing, and utilizing a rapid re-housing model are highly prioritized by HUD since they are worth the greatest amount of points among the criteria; even out-numbering some of the other scoring categories.

**CoC Coordination of Housing Services.** While the CoC Coordination of Housing and Services category is worth less than half the points of the prior scoring category, its 28 possible points still makes it the second most significant category. Its

purpose is to evaluate how well a CoC is coordinating its housing and service provision to the homeless both within the CoC itself and with other homeless service providers.

*Table 4.3:*

Description of the Scoring Criteria and the Maximum Points Possible for the CoC

Coordination of Housing and Services Category

<b>CoC Coordination of Housing and Services: 28 Maximum Points Possible for the Category</b>	
<b>2 Points Possible</b>	<b>Preventing Homelessness</b>
“...CoCs that thoroughly describes the CoC’s strategy to reduce the number of individuals and families who become homeless and describe the success of the CoC at reducing the number of individuals and families who become homeless.”	
<b>4 Points Possible</b>	<b>Discharge Planning</b>
“...CoCs that clearly demonstrate how they coordinate with and/or assist in State or local discharge planning efforts to ensure that those discharged are not released directly to the streets, emergency shelters, or other McKinney-Vento Homeless assistance programs.”	
<b>2 Points Possible</b>	<b>Consolidated Plan</b>
“[T]he Consolidated Plan for the jurisdiction(s) within the CoC includes the CoC’s strategic plan goals for addressing and reducing homelessness.”	
<b>3 Points Possible</b>	<b>Emergency Solutions Grant</b>
“...CoCs that demonstrate how the CoC consults with [Emergency Solutions Grant] jurisdiction(s) within the CoC geographic area to determine how [Emergency Solutions Grant] funds are allocated, coordination with [Emergency Solutions Grant] recipients and how [Emergency Solutions Grant]-funded projects are evaluated.”	
<b>1 Point Possible</b>	<b>Coordination with Other Funding Sources</b>
“...CoCs that clearly demonstrate coordination with other Federal, State, local, private, and other entities serving the homeless and those at risk of homelessness in the planning and operation of projects.”	
<b>2 Points Possible</b>	<b>Public Housing Agencies (PHAs)</b>
“...CoCs that clearly demonstrate how they are currently engaged with or are attempting to engage with local [Public Housing Agencies].”	
<b>3 Points Possible</b>	<b>Housing First Approach</b>
“[T]he extent to which the CoC uses a Housing First approach. To receive maximum points, at least 75 percent of the CoC’s permanent supportive housing project applications submitted for FY 2013 funds must report that they follow a Housing First approach, and the CoC must describe specific steps it has taken to implement this approach in permanent supportive housing CoC-wide.”	

<b>2 Points Possible</b>	<b>Centralized or Coordinated Assessment System</b>
“CoCs should have a centralized or coordinated assessment system covering the CoC’s geographic area. HUD will award up to 2 points to CoCs that demonstrate the existence of a centralized or coordinated assessment system and describe how the system is used to ensure that the homeless are placed in the appropriate housing and service types based on their level of need.”	
<b>2 Points Possible</b>	<b>Affirmatively Furthering Fair Housing</b>
“...CoCs that demonstrate recipients have implemented specific strategies that affirmatively further fair housing...”	
<b>2 Points Possible</b>	<b>Educational Assurances</b>
“...CoCs that specifically describe how the CoC collaborates with local education authorities to assist in the identification of individuals and families who become or remain homeless and are informed of the eligibility for services...This includes demonstrating that the CoC has established policies that require homeless assistance providers to ensure all children are enrolled in early childhood programs or in school and connected to appropriate services in the community.”	
<b>2 Points Possible</b>	<b>Preventing Involuntary Family Separation</b>
“[T]he CoC is collaborating with shelter and housing providers to ensure homeless households with children under the age of 18 are not denied admission and are not separated.”	
<b>1 Point Possible</b>	<b>Affordable Care Act</b>
“...CoCs that demonstrate how the CoC is preparing, with project recipients, for the implementation of the Affordable Care Act (ACA) in the state in which the CoC is located.”	
<b>2 Points Possible</b>	<b>Resources for Services</b>
“CoCs should specifically describe the steps it is taking to work with recipients to identify other sources of mainstream resources funding for supportive services in order to reduce the amount of CoC Program funds being used to pay for supportive services costs.”	

Source: Adapted from HUD (2013d).

The NOFA mentions many service providers for which coordination should be occurring: including educational institutions, foster care, health care, mental health, corrections, public housing agencies, Emergency Solutions Grant jurisdictions, government, as well as shelter and housing providers (HUD, 2013d). HUD encourages such coordination so that other funding sources are utilized, other providers are coordinated with, families are kept together, children remain in school, homeless are receiving healthcare, and individuals discharged from institutions are prevented from becoming homeless (HUD, 2013d). However, this category also looks to further strategic

planning of CoCs through requirements of a Centralized or Coordinated Assessment System, examination of the affordable housing plan, referred to as the Consolidated Plan for a CoC’s jurisdiction (HUD, 2006b), as well as reviewing a CoC’s plan and performance in preventing homelessness (HUD, 2013d). The amount of points for each criterion are close, displaying no large preferences by HUD under this category. However, HUD gives the greatest weight to discharge planning, the housing first approach, and coordination with a CoC’s Emergency Solutions Grant jurisdiction(s).

**Recipient Performance.** For this category, HUD examines how well CoCs manage project recipients, meaning the projects in their jurisdiction that receive funding through the CoC Program grant. Essentially, HUD wants to ensure that CoCs properly evaluate and review the performance of project recipients to verify that they meet the performance measures of HUD.

*Table 4.4:*

Description of the Scoring Criteria and the Maximum Points Possible for the Recipient Performance Category

<b>Recipient Performance: 15 Maximum Points Possible for the Category</b>	
<b>3 Points Possible</b>	<b>Performance Monitoring</b>
“...CoCs that demonstrate that the CoC monitors the performance of recipients on HUD-established performance goals that are reported in the FY 2013/FY 2014 CoC Application and included in the strategic planning process...that address ending chronic homelessness, increasing housing stability, increasing project participant income and mainstream benefits, and the use of rapid re-housing to reduce homelessness among households with children.”	
<b>3 Points Possible</b>	<b>Increasing Performance</b>
“...CoCs that demonstrate that recipients are assisted to meet HUD-established performance goals...”	
<b>3 Points Possible</b>	<b>Increasing Capacity</b>



“...CoCs that demonstrate how the CoC assists underperforming recipients to increase their capacity to implement program requirements (e.g., submission of timely reports, timely draws for funds, etc.) in order to successfully carry out the requirements of the Act, CoC Program interim rule, and local CoC priorities.”	
<b>3 Points Possible</b>	<b>Reducing Homeless Episodes</b>
“...CoCs that provide information to HUD on the length of time individuals and families remain homeless and specifically describe how the length of time that individuals and families remain homeless will be reduced in the community.”	
<b>1 Point Possible</b>	<b>Outreach</b>
“...CoCs that demonstrate a thorough plan for reaching homeless individuals and families.”	
<b>2 Points Possible</b>	<b>Tracking and Reducing Returns to Homelessness</b>
“...CoCs that provide information to HUD on the extent to which individuals and families leaving homelessness experience additional spells of homelessness and specifically describe how the number of individuals and families who return to homelessness will be reduced in the community. In order to receive full points, the CoC must demonstrate the use of HMIS, or a comparable database, within the CoC to monitor and record returns to homelessness by participants who exit rapid re-housing, transitional housing, and permanent supportive housing.”	

Source: Adapted from HUD (2013d).

These performance measures of HUD are five of the criteria found in the CoC Performance and Strategic Planning category: ending chronic homelessness, housing stability, jobs and income growth, mainstream benefits, and rapid re-housing (HUD, 2013d). To receive the points for this Recipient Performance category, HUD evaluates a CoC on how well it monitors project performance and provides aid to the project recipients to meet these measures. Additionally, to better information performance and planning efforts, the criteria requires CoCs to collect data on homeless in their community. CoCs must also have plans for outreach to homeless, reducing the number of people that return to homelessness, and reducing the amount of time people remain homeless. HUD requires that CoCs provide detailed descriptions of these plans in their application, including information regarding the current plans utilized and the CoC’s use of a Homeless Management Information System (HUD, 2013d). However, the greatest

weight in this category goes to the monitoring and assistance provided to a CoC’s project recipients as well as the CoC’s efforts and plans at reducing homeless episodes.

**CoC Housing, Services and Structure.** The scoring category of CoC Housing, Services and Structure is a review of the internal processes of the CoC itself. The NOFA describes how a CoC should operate with a “coordinated, inclusive and outcome-oriented community process” (HUD, 2013d).

*Table 4.5:*

Description of the Scoring Criteria and the Maximum Points Possible for the CoC Housing, Services and Structure Category

<b>CoC Housing, Services and Structure: 13 Maximum Points Possible for Category</b>	
<b>2 Points Possible</b>	<b>CoC Meetings</b>
“... CoCs that can clearly demonstrate that they conduct regular meetings that are open to the public and inclusive of the homeless and/or formerly homeless.”	
<b>2 Points Possible</b>	<b>Complaints</b>
“CoC...did not receive any written complaints from recipients, subrecipients, applicants, or other members of the CoC...within the 12 months before the CoC Program Application submission deadline. In the event the CoC did receive complaints, the Collaborative Applicant must address whether the complaints were resolved in a manner that was satisfactory and without retaliation to the entity who lodged the complaint.”	
<b>2 Points Possible</b>	<b>Inclusive Structure</b>
“CoCs must demonstrate an inclusive structure and application process.” Two measures: 1) “CoCs that demonstrate the most active CoC-wide committees, subcommittees, and workgroups established within the CoC that are directly involved in addressing homelessness prevention, as well as the goals for ending homelessness. 2) ...CoCs that clearly and specifically describe how the CoC works with homeless services providers that have expressed an interest in applying for HUD funds and what steps it takes to discuss and review proposals as well as provide valuable feedback and guidance.”	
<b>2 Points Possible</b>	<b>Project Application Performance Metrics</b>
“Each CoC will be scored based on the extent to which it reviews and ranks projects using periodically collected data on the projects within the CoC in order to conduct analysis on the effectiveness of each project and to determine the extent to which each project has resulted in rapid return to permanent housing for those served by the project, taking into account the severity of barriers faced by the project participants. HUD will award up to 2 points to CoCs that are able to	

provide a clear description of the current processes in place or how they propose to collect and analyze the information.”	
<b>1 Point Possible</b>	<b>Accuracy of Grant Inventory Worksheet</b>
“..CoCs that attach the final [Grant Inventory Worksheet] that was approved by HUD either during CoC Registration or, if applicable, during the 7-day grace period following the publication of the CoC Program NOFA without changes.”	
<b>3 Points Possible</b>	<b>Ranking and Selection Process</b>
“...CoCs that demonstrate the use of a ranking and selection process for project applications that is based on objective criteria and that have been publicly announced by the CoC, including published written policies and procedures that include dated meeting minutes. The CoC will be required to submit written documentation of a rating and ranking/review process for all projects (new and renewal).”	
<b>1 Point Possible</b>	<b>Housing Inventory Count Submission</b>
“...CoCs that submitted the 2013 Housing Inventory Count (HIC) data in the [Homeless Data Exchange] by the April 30, 2013, submission deadline.”	

Source: Adapted from HUD (2013d).

For this category, HUD awards points to CoCs for having regular public meetings that allow for the involvement of homeless individuals as well as for timely submission and accuracy of the Grants Inventory Worksheet and Housing Inventory Count (HUD, 2013d). Additionally, the CoC is evaluated on the fairness of its processes. Specifically, HUD looks at the CoC’s processes for handling complaints, how open and all-encompassing their decision-making process and application for funds are, the CoC’s use of performance data on its project recipients to aid in project ranking, and the existence of a public and fair process for ranking projects on their Priority Listings (HUD, 2013d). While only one point higher than the rest of the criteria, HUD gives the highest amount of points under this category to the criteria of an established Ranking and Selection Process for projects in a CoC’s jurisdiction.

**Leveraging.** A maximum of five points is available for the category of Leveraging. This category only has one criterion and its purpose is to evaluate how well a

CoC and its project recipients supplement the grant funding received from the CoC Program with other sources (HUD, 2013d).

*Table 4.6:*

Description of the Scoring Criteria and the Maximum Points Possible for the Leveraging Category

<b>Leveraging: 5 Maximum Points Possible for this Category</b>	
<b>5 Points Possible</b>	<b>Leveraging</b>
	“...CoCs that demonstrate the extent to which the amount of assistance to be provided to the CoC will be supplemented with resources from other public and private sources, including mainstream programs. CoCs that have 100 percent participation in leveraging from all project applications (including only those projects that have commitment letter(s) on file that are dated within 60 days of the CoC application deadline) and that have at a minimum 150 percent leveraging will receive the maximum points.”

Source: Adapted from HUD (2013d).

The use of the term leveraging by HUD refers to augmenting any funding received from the grant with aid from other providers (HUD, 2013d). This is the only scoring category with only one criterion and is also worth the least amount of points.

**Homeless Management Information System (HMIS).** The Homeless Management Information System (HMIS) category measures a CoC based on their use of the HMIS data collection system that HUD requires CoCs to maintain and utilize. The fact that an established category for the HMIS exists displays its importance to HUD. Additionally, the 11 maximum points possible for this category further shows its importance, since this makes the HMIS category worth more points than the Leveraging and Point-In-Time Count categories.

Table 4.7:

Description of the Scoring Criteria and the Maximum Points Possible for the Homeless Management Information System (HMIS) Category

<b>Homeless Management Information System (HMIS): 11 Maximum Points Possible for this Category</b>	
<b>2 Points Possible</b>	<b>HMIS Governance</b>
“...CoCs that have in place a HMIS governance charter. To receive maximum points, the CoC must attach a copy of the HMIS governance charter [to the CoC Application].”	
<b>1 Points Possible</b>	<b>HMIS Plans</b>
“Each HMIS Lead should have the following plans in place: Privacy Plan, Security Plan, and Data Quality Plan. HUD will award up to 1 point to CoCs that describe how these plans are reviewed by the CoC and ensures that the HMIS Lead reviews and revises these plans on a regular basis.”	
<b>2 Points Possible</b>	<b>HMIS Funding</b>
“...CoCs that demonstrate that the HMIS is supported by non-HUD sources. CoCs will be assessed on the total funding generated for the HMIS from all sources—HUD, other federal sources, State and local, private, etc.—that includes the amounts for all matching sources, both cash and in-kind. To receive maximum points, the CoC must demonstrate that at least 25 percent of the HMIS budget (not including required match) is supported through non-CoC Program cash or in-kind sources.”	
<b>2 Points Possible</b>	<b>Bed Coverage</b>
“...CoCs that record 86 percent or higher for the bed coverage rate. The bed coverage rate is the number of HMIS participating beds divided by the total number of year-round beds dedicated to the homeless in the geographic area covered by the CoC... Further, if the bed coverage rate is 0-64 percent, the CoC must provide clear steps on how it intends to increase this percentage over the next 12 months to receive partial credit.”	
<b>2 Point Possible</b>	<b>Data Quality</b>
“...CoCs that have below 10 percent null or missing values and 10 percent of refused or unknown records as recorded in the HMIS will receive maximum points.”	
<b>1 Point Possible</b>	<b>Entry and Exit Dates</b>
“...CoCs that demonstrate the procedures in place to ensure program entry and exit dates are recorded in HMIS.”	
<b>1 Point Possible</b>	<b>Required Reports</b>
“...CoCs that demonstrate that they are able to generate HUD required reports...from the HMIS system.”	

Source: Adapted from HUD (2013d).

HUD awards points in this category for CoCs that do in fact have an electronic HMIS that is being utilized (HUD, 2013d). Specifically, HUD requests each CoC to have a charter for the HMIS as well as plans to ensure privacy, quality, and security of the data. Additionally, HUD wants funding for the HMIS to occur through sources outside of the grant, 25% at least, since other government programs outside of the CoC Program require the use of HMIS as well (HUD, 2013d). When it comes to the data itself, HUD awards points to CoCs that can produce reports from the data, have quality data, and record the entry and exit dates of homeless in accordance with HMIS policies (HUD, 2013d). Furthermore, HUD requests CoCs to have a high bed coverage rate at or above 86%, referring to the proportion of beds for homeless annually in the CoC’s jurisdiction that are monitored in the HMIS (HUD, 2013d). The distribution of points among the criteria is close, leaving no stand out preferences of HUD.

**Point-In-Time Count.** In accordance with HUD’s interest in data collection, they award up to 9 points to CoCs for gathering Point-in-Time Count (PIT) data.

*Table 4.8:*

Description of the Scoring Criteria and the Maximum Points Possible for the Point-In-Time (PIT) Count Category

<b>Point-In-Time (PIT) Count: 9 Maximum Points Possible for this Category</b>	
<b>3 Points Possible</b>	<b>PIT Count and Data Submission</b>
“...CoCs that conducted a PIT count and reported the data in [Homeless Data Exchange]”. Three measures: 1) “[C]onducted a sheltered and unsheltered PIT count during the last 10 days of January 2013; 2) [S]ubmitted the PIT data for 2013 [Homeless Data Exchange] by April 30, 2013; and 3) [P]rovided the percentage of homeless service providers that supplied information on population and subpopulation data.”	
<b>2 Points Possible</b>	<b>Change in PIT Since 2012</b>

“... CoCs that demonstrate an overall reduction in the number of individuals and families who have become homeless since the number reported in the FY 2012 CoC Program Competition.”	
<b>2 Points Possible</b>	<b>Subpopulation Data</b>
“[T]he CoC’s ability to collect and report accurate and quality subpopulation data for the sheltered homeless during the 2013 PIT count.”	
<b>2 Points Possible</b>	<b>Methodology for Unsheltered Count</b>
“[T]he CoCs ability to collect and report accurate and quality data on the unsheltered homeless by using methods to reduce the occurrence of counting the unsheltered homeless more than once during the 2013 PIT count.”	

Source: Adapted from HUD (2013d).

Specifically, CoCs receive points for conducting and reporting a PIT Count. The criterion that measures this, PIT Count and Data Submission, is worth more points than the other criteria but only by one point. HUD also takes into account the accuracy of the data through awarding points based on quality and accuracy in collecting subpopulation data of sheltered homeless and for using methods that ensure unsheltered homeless are not counted more than once. Finally, HUD awards points in this category if a reduction in the number of homeless occurred in the PIT Count from FY 2012 to the most recent count (HUD, 2013d). All together HUD gives a slight preference in this category for merely conducting and reporting the PIT Count.

**Bonus Points.** Outside of the seven categories mentioned, up to 6 bonus points were possible in the CoC Program competition. HUD awards these points for three distinct criteria that help to shed light on HUD’s preferences.

*Table 4.9:* Description of the Scoring Criteria and the Maximum Points Possible for Bonus Points

<b>Bonus Points: 6 Maximum Points Possible</b>	
<b>2 Points Possible</b>	<b>Administration</b>

“... CoCs where 100 percent of the project applications request 7 percent or less in project administration costs.”	
<b>2 Points Possible</b>	<b>SSO Projects</b>
“... CoCs where no SSO projects (excluding those that were awarded in the FY 2012 CoC Program Competition for coordinated assessment) are prioritized in Tier 1.”	
<b>2 Points Possible</b>	<b>Accuracy of Submission</b>
“... CoCs that accurately and completely include all submitted project applications on the Form HUD-2991.” This form is a certification by an official of a jurisdiction in the CoC that projects in the application align with the Consolidated Plan for their jurisdiction.	

Sources: Adapted from: HUD (n.d.-a, 2013d).

Essentially, the bonus points show HUD’s preference that CoCs spend the CoC grant funding minimally on administrative costs and that CoCs prioritize funding for housing projects rather than supportive service-only projects. Additionally, it shows HUD’s interest in ensuring adherence of the projects funded in a CoC to the Consolidated Plan in its jurisdiction. However, the bonus points are subject to change for every year of the competition, therefore they may not provide much weight in analyzing future scoring rounds.

### **Conclusion**

Through the review of the seven main scoring categories, the prominent preferences of HUD become evident. Specifically, HUD’s greatest interest is in the category of CoC Strategic Planning and Performance. They especially have a preference in this category for the use of permanent supportive housing and rapid re-housing as well as progress in achieving the *Opening Doors* goals to end homelessness for the chronically homeless, veterans, and families. Outside of this category, the maximum points possible per category display HUD’s preferences regarding each of the remaining scoring categories. These include, in descending order, HUD’s interest in a CoC’s



coordination of services (28 points), their monitoring of project recipient performance (15 points), a CoC's internal structure and processes (13 points), the existence of a functioning and utilized HMIS (11 Points), a thorough PIT Count (9 Points) and their leveraging of resources (5 points).

### **Methodology**

In the next chapter, I conduct an analysis of the HPAC CoC Application. The method for this analysis involves a comparison of the responses of the HPAC on their application to the scoring categories and criteria of the FY 2013-FY 2014 CoC Program competition. I chose this competition year exclusively, rather than incorporating other competition years for the analysis, since its criteria differed from the FY 2012 competition. Therefore, the FY 2013-FY 2014 round is both the most recent competition and incorporates the most current scoring criteria, thereby representing the best prediction for the scoring criteria and requirements of future grant competitions.

To conduct the analysis, I placed a summary of the HPAC's CoC Application responses in tables according to the breakdown of the scoring categories. The descriptions coincide to the criteria with the potential points possible listed as well. From these tables, I deduce potential deficiencies in the HPAC's application based on responses that do not appear to meet the scoring criteria. In the final chapter, I expand on the identified deficiencies to develop recommendations to improve the score of the HPAC grant application.

Ideally, it would be beneficial to look at the applications of comparable CoCs to the HPAC that received high scores in the FY 2013-FY 2014 CoC Program competition.

This would allow for greater recommendations regarding improving the deficiencies of the HPAC as identified in the analysis. While I would have wanted to use the scores of comparable CoCs in my analysis, the data was unavailable. Very few CoCs release their scores publicly. This means that the number of high scoring CoCs with a publicly available application and copy of their scores for the most recent scoring round is extremely limited. The options are further limited for finding a CoC that serves a region comparable to that of the HPAC. Therefore, in my recommendations I will instead draw upon the national best practices, HUD's scoring criteria, and HUD's future preferences, to provide suggestions as to how the HPAC may improve their score in the CoC Program competition.

## Chapter Five

### ANALYSIS OF THE HPAC'S APPLICATION

With knowledge regarding the scoring criteria of the FY 2013-FY 2014 CoC Program, it is now necessary to understand how the HPAC performed in that scoring round. In this chapter, I compare the HPAC's application responses to the scores they received to determine areas of deficiency. I begin by discussing the HPAC's application score, the projects they prioritized, and the funding they received. Then I analyze how the services of the HPAC, as described in their application responses, compare to the scoring criteria in the FY 2013-FY 2014 NOFA for the CoC Program. Finally, I describe deficiencies in the HPAC's application that may have resulted in their reduced score.

#### **HPAC's Application Score**

As previously mentioned, the CoC Program competition for FY 2013-FY 2014 was unique because for the first time the score given to CoCs for the application submitted in FY 2013 would apply for the next two rounds of the competition: FY 2013 and FY 2014 (HUD, 2013d). Therefore, in FY 2014, CoCs kept their FY 2013 score and, instead of filing a CoC Application, they only filed their Project Applications and Priority Listings. HUD stated that this occurred "...for purposes of expediency and efficiency," while also mentioning unique funding limitations resulting from the federal Consolidated Appropriations Act, 2014 (HUD, 2013d). Therefore, it will likely not be the process used in future funding years.

For the FY 2013-FY 2014 grant competition, as shown in Table 5.1, out of the 156 possible points from seven categories and potential bonus points, the HPAC received

a total of 93.25 points. According to HUD, 143.25 points represented a high score while 45 points represented a low score (HUD, n.d.-b). While not considered low, the total score that the HPAC received placed them below the national average score of 113.5 and the median score of 116.5 (HUD, 2014c). This positioned the HPAC in the second lowest distribution category, as displayed in Figure 8.

*Table 5.1:*

FY 2013-FY 2014 CoC Program Competition Points Possible and the Points Received by the HPAC

<b>FY 2013-FY 2014 Scoring Categories</b>	<b>Points Possible</b>	<b>Points Received by HPAC</b>	<b>Percentage of Points Received*</b>
<i>CoC Strategic Planning and Performance</i>	69	39.5	57.25%
<i>CoC Coordination of Housing and Services</i>	28	16.5	58.93%
<i>Recipient Performance</i>	15	4	26.67%
<i>CoC Housing, Services, and Structure</i>	13	9.25	71.15%
<i>Leveraging</i>	5	5	100%
<i>Homeless Management Information System</i>	11	7	63.64%
<i>Point-in-Time Count</i>	9	8	88.89%
<b>CoC Application Score</b>	<b>150</b>	<b>89.5</b>	<b>59.67%</b>
<i>Bonus Points</i>	6	4	66.67%
<b>Total CoC Score with Bonus Points</b>	<b>156</b>	<b>93.25</b>	<b>59.78%</b>

Note: \*Percentage Rounded to .01

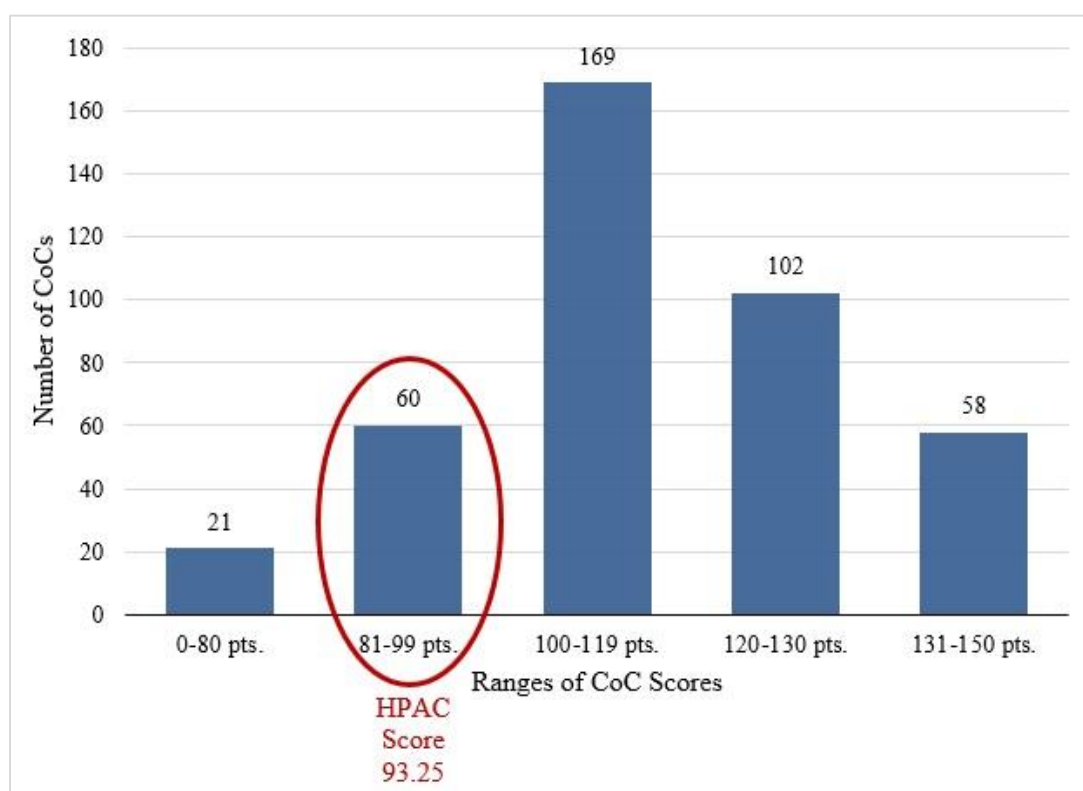
Sources: Adapted from HUD (n.d.-b).

The breakdown of the scoring categories in Table 5.1 helps to illuminate the areas in which the HPAC could improve. Specifically, the HPAC received the lowest proportional scores in the category of Recipient Planning, receiving only 26.67% of the possible points, followed by CoC Strategic Planning and Performance (57.25%), and CoC Coordination of Housing and Services (58.93%). The HPAC scored the highest in Leveraging (100%) and for their PIT Count (88.89%); however, these two categories

were worth the lowest amount of points. Unfortunately, HUD does not provide CoCs with an explanation as to why they assigned specific scores, leaving the exact reasons behind the scores received difficult to determine.

*Figure 8:*

The HPAC's Location in the Distribution of Scores among the 410 CoCs that Participated in the FY 2013-FY 2014 CoC Program



Source: Adapted from HUD (2014c).

### **Priority Listings and Funding Received**

Since the score received in FY 2013 factored in the types of projects and funding requested in that fiscal year only, I discuss the Priority Listings for FY 2013 and exclude the listings in FY 2014.

Table 5.2:

## The HPAC's Priority Listings and Annual Renewal Demand for FY 2013

<b>Tier 1</b>				
<b>Rank</b>	<b>Agency and Grant Name</b>	<b>Type*</b>	<b>ARD* Before 5% Cuts</b>	<b>ARD After 5% Cuts</b>
1	Yolo Community Care Continuum: Supported Housing	PH	\$90,945	\$90,945
2	City of Woodland/Fourth and Hope: Permanent Supportive Housing for Chronically Homeless Individuals	PH	\$23,455	\$23,455
3	City of Woodland/Fourth and Hope: Permanent Supportive Housing for Chronically Homeless Families	PH	\$23,665	\$23,665
4	City of Woodland/Fourth and Hope: Transitional Housing 2013	TH	\$165,920	\$154,068
5	City of Davis/Davis Community Meals: Transitional Housing for Homeless Single Men and Women	TH	\$108,786	\$101,016
6	United Christian Centers: Solutions Life Skills Classes	TH	\$47,413	\$44,026
<b>Total ARD</b>			<b>\$460,184</b>	<b>\$437,175</b>
<b>5% Cut of ARD</b>			\$23,009	
<b>Tier 2</b>				
7	City of Woodland/Fourth and Hope: 2013 Reallocation Project	PH	N/A	\$23,009
<b>Total Funding Request</b>				<b>\$460,184</b>

Note: \*Annual Renewal Demand (ARD); Permanent Housing (PH); Transitional Housing (TH)

Sources: Adapted from HPAC (2014b; 2014e).

The HPAC's Priority Listings for FY 2013 displayed their focus on retaining their Annual Renewal Demand and in aligning with the priorities of HUD. Since HUD required reductions of 5% in the Annual Renewal Demand for each CoC (HUD, 2013d), as shown in Table 5.2, the HPAC strategically placed their cuts only on transitional housing projects and then reallocated the cut funds through the creation of a new permanent supportive housing project (HPAC, 2014a). Despite a score below the national average and in the second lowest distribution, the HPAC received funding for all of their projects in the first and second Tier (HPAC, 2014d). In this way, the CoC assured the

retention of its full amount of Annual Renewal Demand prior to the required cuts.

Essentially, it appears that the score of the HPAC did not negatively affect funding for its projects during the 2013 fiscal year.

*Table 5.3:*

HUD's Project Selection Priorities for the FY 2013-FY 2014 CoC Program

<b>Rank</b>	<b>Project Priority</b>
1	Renewal permanent housing projects, rapid re-housing or permanent supportive housing
2	New permanent supportive housing projects created through reallocation for 100% chronically homeless
3	New rapid re-housing projects created through reallocation for homeless households with children
4	Renewal transitional housing
5	CoC planning costs
6	Unified Funding Agency costs
7	Supportive services only projects for Centralized or Coordinated Assessment System
8	Renewal Homeless Management Information System
9	All other renewal supportive service only projects
10	Any project application submitted by the CoC that was not included in the HUD-approved Grant Inventory Worksheet

Source: Adapted from HUD (2013d).

Additionally, the ranking of the HPAC's projects aligned with the goals of HUD. The HPAC ranked their permanent supportive housing projects first and their transitional housing projects after, with no supportive service-only projects. This matches well with the project selection priorities of HUD shown in Table 5.3. While the priorities appeared matched, the HPAC did not apply for CoC Planning project funds of up to \$6,540, as offered by HUD (2014h). The reason for this is unclear; however, it is possible that the HPAC had not yet developed such a project.

### **Comparison of the HPAC's Application to HUD's Scoring Criteria**

To determine areas of deficiency that resulted in the HPAC's score, I analyze their homeless housing and service provision, as described in their FY 2013-FY 2014 CoC Application, and compare it to the scoring criteria set forth by HUD for that competition round. I utilize FY 2013-FY 2014 since it is the most recent scoring round, making it the best prediction for future scoring criteria, and because its criteria differed considerably from FY 2012. As a result, the information provided regarding the HPAC's housing and service provision, as well as their planned strategies, is based on their application, as submitted for FY 2013, and does not reflect any potential changes made by the HPAC since submission. Additionally, HUD does not provide CoCs with information regarding why they received the scores they received and only provide CoCs with a score for the main scoring categories, not the criteria. Therefore, this analysis seeks to estimate why the HPAC received its particular scores.

I structured this analysis by performing the comparison under each one of the seven main scoring categories. I discuss each of the categories separately beginning with a table listing the criteria for each category. The tables include summaries of the HPAC application responses for each criteria and includes the potential points possible for the criteria.

#### **CoC Strategic Planning and Performance**

The HPAC received the lowest number of points under this category, 39.5 out of a possible 60.



Table 5.4:

Application Responses of the HPAC for the Scoring Criteria of the CoC Strategic  
Planning and Performance Category

<b>CoC Strategic Planning and Performance: HPAC received 39.5 points out of 69 Maximum Points Possible</b>	
<b>16 Points Possible</b>	<b>Ending Chronic Homelessness</b>
<p>As of 2013, the HPAC had 3 permanent supportive housing projects of which two served the chronically homeless exclusively. The CoC had 39 permanent supportive housing beds dedicated for chronic homeless use and estimated one addition to this by 2015. They also had 38 permanent supportive housing beds funded by CoC funds but not dedicated to the chronically homeless exclusively.</p> <p>The HPAC provided information to correspond with HUD's five measures for this criterion. 1) The HPAC did not increase the number of its permanent supportive housing beds dedicated for use by the chronically homeless to 58 units as they had proposed to do in their 2012 application. 2) The HPAC committed to try to increase permanent supportive housing for the chronically homeless but by only one bed by 2015. 3) The HPAC committed to prioritizing 100% of the CoC-funded permanent supportive housing beds not currently dedicated to the chronically homeless but made available through turnover to be dedicated to the chronically homeless in the next year. 4) The HPAC committed to maintain the 100% dedication of turnover permanent supportive housing beds to the chronically homeless for 2014 and 2015. 5) The HPAC committed to increasing permanent supportive housing by 1 bed by 2015. Their plan for increasing permanent supportive housing beds for the chronically homeless to reach the goal of ending homelessness by 2015, included several strategies. The HPAC stated potential plans to reallocate funds from two transitional housing projects to permanent supportive housing. They also stated their plan to utilize a Housing First approach for the chronically homeless and develop a funding strategy in line with the interests of the Department of Employment and Social Services, Yolo County Housing and the County Administrator's Office.</p>	
<b>10 Points Possible</b>	<b>Housing Stability</b>
<p>As of 2013, the HPAC listed that out of 29 homeless people served by CoC funded permanent supportive housing projects, 28 achieved housing stability at a proportion of 97% based on Annual Performance Reports.</p> <p>The HPAC provided information to correspond with HUD's three measures for this criterion. 1) The HPAC listed that 97% of their participants in their CoC-funded projects remained in permanent supportive housing or exited to another permanent housing destination. 2) The HPAC committed to an 80% rate for 2014 and 2015 of participants that remained in or exited permanent housing into another permanent housing destination. The CoC estimated a lower percentage, 80%, the national housing stability goal, for 2014 and 2015. They estimated this due to the small number of permanent supportive housing beds available, making the percentage easily skewed, and that fact that any new permanent supportive housing projects they proposed would not have an Annual Performance Report until after 2015 to contribute performance data. 3) In order to increase the achievement of housing stability through permanent housing, the HPAC stated their plan to utilize quarterly HMIS data reports for review, create a permanent supportive housing working group, continue to work with other organizations in the SMART-Y SSI/SSDI Advocacy Project, and ask</p>	

that the Northern California Homeless Roundtable discuss housing stability with regard to chronic homelessness.	
<b>8 Points Possible</b>	<b>Jobs and Income Growth</b>
<p>The HPAC provided information to correspond with HUD's five measures for this criterion. 1) The HPAC stated that 19% of project participants increased their employment income from entry to exit date in their CoC-funded programs, rather than HUD's ideal of at least 20%. 2) The HPAC reported that 21% of project participants increased their income from sources other than employment from entry to exit date in their CoC-funded programs, rather than HUD's ideal of at least 54%. 3) The HPAC committed to increasing the percentage of participants who increase their employment income from program entry to exit date to 22%. 4) The HPAC committed to increasing the percentage of participants who increase their income from sources other than employment from program entry to exit date to 23% in 2014 and 26% in 2015, rather than HUD's ideal of at least 54%. 5) The HPAC described their plan regarding increasing income for program participants. They stated that they see themselves as providing a strong service with regard to increasing the non-employment income of homeless in their CoC-funded programs. The HPAC also provided a 6-step plan over the next two years to achieve the 26% increase they proposed that included greater use of HMIS and further research on best practices. For employment income, the HPAC provided a less structured plan. They stated that they would continue to provide employment training to homeless through various programs, research best practices and analyze potential improvements. HPAC notes in the application that homeless in their jurisdiction often receive these services through outreach or shelter before entering programs, therefore their percentages are below HUD's desired 54% minimum since HUD is looking for the percent change from program entry to program exit.</p>	
<b>7 Points Possible</b>	<b>Mainstream Benefits</b>
<p>The HPAC provided information to correspond with HUD's three measures for this criterion. 1) The HPAC reported 49% of homeless project participants received non-cash mainstream benefits after their entry to and before their exit from projects funded by CoC, rather than HUD's ideal of at least 56%. 2) The HPAC estimated an increase in 2014 and 2015 to 50% of their homeless project participants receiving non-cash mainstream benefits after their entry to and before their exit from projects funded by CoC, rather than HUD's ideal of at least 56%. 3). To help achieve an increase in the attainment of non-cash mainstream benefits, the HPAC stated their plan to provide a training workshop with required attendance for staff of CoC and ESG programs regarding the use of data to assist in obtaining income and non-cash mainstream benefits. They also plan to begin reviewing quarterly Annual Performance Reports of each program and a report of their data to ensure compliance.</p>	
<b>10 Points Possible</b>	<b>Rapid Re-housing</b>
<p>In 2013, the HPAC had 24 homeless families with children in the CoC region housed under a rapid re-housing project with Emergency Solutions Grant funds. The HPAC did not have a CoC-funded rapid re-housing project</p> <p>The HPAC provided information to correspond with HUD's three measures for this criterion. 1) The HPAC proposed an increase of 0 for the number of homeless households with children assisted through rapid re-housing programs for 2014 and 2015. 2) The HPAC did not propose to increase their rapid re-housing as they stated a lack of available funding. They stated their strategy to apply for more rapid re-housing through the Emergency Solutions Grant and to request that the Ten Year Plan Commission discuss methods of obtaining funds outside of the Emergency Solutions Grant. 3) The HPAC does not have any policies for prioritizing rapid re-housing since they do not have any funded through the CoC Program. The HPAC stated the policies of those administering the Emergency Solutions Grant funds. They set prioritization procedures and biweekly meetings to</p>	

choose which families to house as priority. The families then receive weekly case management that reduces to monthly over time as well as monthly follow up for a year for families no longer receiving housing assistance.	
<b>3 Points Possible</b>	<b>Opening Doors</b>
<p>The HPAC stated that they included the goals of Opening Doors into their plans. Specifically, the CoC listed their focus on ending chronic homelessness, preventing and ending homelessness for veterans, preventing and ending homelessness for families, youth and children, as well as using a housing focus to aid in the goal of ending all types of homelessness.</p> <p>HPAC was not aware of any entry barriers to projects funded by CoC funds in their region but stated that they would perform a survey to determine any barriers. They had already provided workshops about entry barriers to rental property owners and employers. However, they did state issues of clarity among programs with regard to HUD rules on prioritizing housing for homeless subpopulations and that they would provide training to project staff to ensure understanding.</p>	
<b>4 Points Possible</b>	<b>Ending Family Homelessness</b>
<p>The HPAC has a transitional housing program in every city of the CoC as well services provided by a Family Resource Center (FRC) in Davis and Woodland, the Yolo Children's Alliance in West Sacramento and the Yolo Crisis Nursery in Davis. The HPAC stated priority in shelters and case management for housing as given to families with children. Additionally, the HPAC stated "...half of new permanent supportive housing applications [had] been to serve chronically homeless families."</p>	
<b>2 Points Possible</b>	<b>Addressing the Needs of Victims of Domestic Violence</b>
<p>The HPAC described that the Sexual Assault and Domestic Violence Center (SADVC) handle the subpopulation of victims of domestic violence in the region. SADVC, an HPAC member, assists in the provision and coordination of housing, female inmate discharge arrangement, and education to the CoC and other service providers on domestic violence issues. At the time of the application, SADVC was ensuring that the Coordinated Assessment system would correctly process domestic violence victims.</p>	
<b>2 Points Possible</b>	<b>Ending Youth Homelessness</b>
<p>The HPAC stated the belief that unaccompanied youth in the HPAC region, less than 18 years old, double up making them not homeless according to the HUD definition. As a result, the 2013 PIT Count for the region identified 0 unaccompanied homeless youth less than 18 years of age. The HPAC specified that they had obtained technical assistance to help them in finding unaccompanied youth of this age group. Accordingly, as of 2013, this subpopulation did not have a housing service in the HPAC region.</p> <p>With regard to the unaccompanied homeless youth between 18-24 years, as of 2013 the HPAC had a Transitional Housing Placement Plus Program for youth that leave or age out of the foster care system.</p>	
<b>3 Points Possible</b>	<b>Reaching Unsheltered Homeless</b>
<p>As of 2013, homeless service providers reached unsheltered homeless in the HPAC region primarily through referral and the general knowledge in the homeless community of their existence. Each of the three main cities in the CoC had a prominent homeless service provider described by the HPAC as "well-known and located in easy-to-find locations". Additionally, the HPAC specified that 2-1-1 information services, public librarians, as well as other homeless individuals refer people in need of services.</p>	

<b>4 Points Possible</b>	<b>Ending Veteran Homelessness</b>
	The HPAC described their efforts at ending veteran homelessness through their inclusion in their membership of the Chair of the Yolo County Veterans Council and the Grant and Per Diem Liaison for the Department of Veterans Affairs Northern California Health Care System. They also described their work to obtain vouchers from HUD VASH and their plan to work with other counties to develop a coordinated response to veteran homeless, since they described, as of 2013, that the population was “not a concentrated group”.

Source: Adapted from HPAC (2014a).

When it comes to the first five criteria, the HPAC’s performance was below HUD’s standards and they projected minimal increases for their performance in the future. The HPAC described in their application that a lack of available beds and limited funding for new permanent supportive housing resulted in their current performance and small estimated increases for the criteria of ending chronic homelessness and achieving housing stability (HPAC, 2014a). Similarly, the HPAC described rapid re-housing projects as limited by a lack of funds from both the CoC Program and the Emergency Solutions Grant Program. For the criteria that measure income from employment, income from non-employment sources, and mainstream benefits, the HPAC’s 2013 performance percentages, 19%, 21% and 49% respectively, were below HUD’s desired standards of 20%, 54% and 56%. However, they explained that these low percentages were due to the homeless in their jurisdiction often receiving these services through outreach or shelter before entering programs. Since HUD measures performance from the entry and exit dates from programs, the HPAC claimed that their percentages were below the standards but did not reflect their actual performance (HPAC, 2014a). As a result, like the other criteria, the HPAC projected relatively small increases for these numbers in the future.

For the remaining criteria, dealing with the CoC’s performance and planning with regard to the various subpopulations of homeless, the HPAC appeared to meet almost all

of the standards. The HPAC stated that they in fact had included the goals of *Opening Doors* in their ten-year strategic plan. The HPAC also promoted housing as the primary method for addressing the needs of the various homeless subpopulations, in line with the *Opening Doors* plan as well. They also prioritized chronically homeless individuals and families for housing, especially permanent supportive housing (HPAC, 2014a). However, reaching all of these subpopulations appeared to present some challenges for the CoC.

The homeless subpopulations that the HPAC appeared to have difficulty reaching were unaccompanied youth, veterans, and potentially the unsheltered homeless. The PIT Counts have shown unaccompanied children under 18 to be almost nonexistent in the region, likely a result of the population's tendency to stay temporarily with other family or friends, leaving them without a service program (HPAC, 2014a). Similarly, the only service specified for unaccompanied youth 18-24 years, is through transitional housing for former or aging out foster youth. For veterans, the HPAC struggled with the "[un]concentrated" nature of their homeless veteran population, leading the CoC to state future plans to collaborate with neighboring regions to target this group (HPAC, 2014a). Additionally, provision of homeless services through a main provider were listed as being available in each of the three major cities in the HPAC: West Sacramento, Davis and Woodland. However, referrals were the only method described by the CoC as their outreach effort for unsheltered homeless (HPAC, 2014a).

Ultimately, it appears from a review of the HPAC's application responses, that they may have lost a large portion of their points in the first five criteria. These are the criteria worth the highest amount of points, with three of them worth as much or more

than other scoring categories. Since the HPAC reported low performance with limited projections for increases, these criteria are likely a large contributing factor to their low score in this category. Additionally, the HPAC's admitted difficulty in reaching veterans and their lack of a thorough outreach plan for unsheltered homeless outside of referrals, may have resulted in lower scores for those criteria as well.

### **CoC Coordination of Housing Services**

For the category of CoC Coordination of Housing and Services, the HPAC received 16.5 points out of the 28 points possible.

*Table 5.5:*

Application Responses of the HPAC for the Scoring Criteria of the CoC Coordination of Housing and Services Category

<b>CoC Coordination of Housing and Services: HPAC received 16.5 points out of 28 Maximum Points Possible</b>	
<b>2 Points Possible</b>	<b>Preventing Homelessness</b>
<p>Yolo County along with its four cities adopted a ten-year plan to prevent and end homelessness. In 2013 an Emergency Solutions Grant funded program existed for Homelessness Prevention and Rapid Re-housing. Yolo County Housing (YCH), was described by the HPAC as the Public Housing Agency (PHA), that heads the Ten Year Plan for the region and helps to integrate homeless services.</p> <p>Outside of the regular homeless services provided, the HPAC detailed in their application that they would work with the Family Resource Centers and the Homeless Liaison of the Yolo County Office of Education to help in prevention efforts.</p>	
<b>4 Points Possible</b>	<b>Discharge Planning</b>
<p>In 2013, discharge planning for foster care, health care and mental health all had processes mandated by state policy. For foster care youth, housing was available in the HPAC region including a Transitional Housing Placement Plus program. The HPAC have explored creating a project for discharge patients from hospitals but the project had not yet materialized. Primarily the Yolo County Department of Alcohol, Drug and Mental Health performs mental health discharge planning. The HPAC did not list themselves as a collaborating partner or stakeholder for mental health discharge efforts on the application. The realignment plan of Yolo County is the source of discharge planning for inmates out of corrections rather than a state mandate. The HPAC listed the Housing Manager of the non-profit Fourth and Hope, DVSAC and Probation as the ones heavily involved in discharge planning along with other agencies but the HPAC did not list themselves among the collaborative agencies.</p>	

<b>2 Points Possible</b>	<b>Consolidated Plan</b>
Yes. The HPAC stated in their application that the Consolidated Plan for the jurisdictions in their region, include the CoC's strategic goals for addressing and ending homelessness. Specifically, the CoC provided four goals: prevention of homelessness, housing, supportive services, and implementation of the Yolo County ten-year plan to end homelessness.	
<b>3 Points Possible</b>	<b>Emergency Solutions Grants (ESG)</b>
Agencies within the CoC apply for ESG funds through the California State Housing and Community Development Department (HCD) rather than straight to HUD. HCD ESG staff and CoC members attend meetings provided by each other and CoC staff attend workshops put on by HCD. The HPAC assign points for ESG applications in their region based on need and they use this as a way to prioritize ESG projects.	
<b>1 Point Possible</b>	<b>Coordination with Other Funding Sources</b>
While the CoC did not state specifically in its Consolidated Application that it coordinates with other funding sources. The HPAC did state that they collaborate and actively seek to involve agencies to participate in the CoC's efforts: including private, federal, state, and local agencies. The HPAC's partnership with HCD in ESG planning as well as the CoC's efforts in starting the Northern California/Central Valley Homeless Roundtable were examples of this coordination.	
<b>2 Points Possible</b>	<b>Public Housing Agencies (PHAs)</b>
The PHA for the HPAC region as of 2013, who is also a CoC member, is Yolo County Housing. The HPAC listed Yolo County Housing as the head of the Yolo County ten-year strategic plan and the agency that works to coordinate with other agencies in the CoC geographic area regarding homeless services and housing.	
<b>3 Points Possible</b>	<b>Housing First Approach</b>
According the HPAC application, the permanent supportive housing providers in the region already have adopted a Housing First approach. The HPAC stated that they have had trouble in implementing this approach fully due to the limited number of permanent supportive housing beds that ultimately force the utilization of other types of housing, such as transitional housing.	
<b>2 Points Possible</b>	<b>Centralized or Coordinated Assessment System</b>
At the time of the filing of the application, in 2013, the HPAC indicated that they had a Coordinated Assessment system but that it was in the process of being updated. They described the system as helping to ensure that the homeless are more accurately coordinated to the services they need and to available housing more efficiently. However, the HPAC pointed to the limitation on available housing as an impediment to correct designation of housing for homeless subpopulations.	
<b>2 Points Possible</b>	<b>Affirmatively Furthering Fair Housing</b>
While not listing the exact procedures used, the HPAC stated that they perform annual training on fair housing, hire bilingual staff, and have Housing Resources Centers.	
<b>2 Points Possible</b>	<b>Educational Assurances</b>
The HPAC described that they work with education providers, including the Yolo County Office of Education, in the region to ensure that laws regarding educational services to children are followed. Additionally, the CoC require homeless service providers for families with children to have a staff member or provide training regarding school enrollment.	
<b>2 Points Possible</b>	<b>Preventing Involuntary Family Separation</b>

The HPAC stated their understanding that involuntary separation was not an issue in their region as all of the types of housing available had accommodations for families thereby allowing them to stay together.	
<b>1 Point Possible</b>	<b>Affordable Care Act</b>
The HPAC described how the Affordable Care Act allows more homeless adults to qualify for Medi-Cal. The Yolo County Department of Employment and Social Services (DESS), who is an HPAC member, had provided information at HPAC meetings and partnered with non-profits in the region to inform and help with enrollment for the homeless in Medi-Cal .	
<b>2 Points Possible</b>	<b>Resources for Services</b>
The HPAC’s application did not detail a plan for identifying alternative sources of funding for supportive services, but they did state that they, “[Would] continue to explore this.” The HPAC claimed that many of their homeless service providers own their properties making them unable to apply for leasing funds, thereby requiring operating and supportive service funding.	

Source: Adapted from HPAC (2014a).

The coordination efforts of the HPAC appeared to match many of the criteria of HUD. The strategy for the HPAC included the goals to both prevent and end homelessness. These goals were included in the four themes of the ten-year plan of the region: prevention, housing, supportive services, and implementation (HPAC, 2014a). In order to accomplish most of their programs the HPAC utilized coordination and collaboration. Specifically, the HPAC listed Yolo County Housing as the Public Housing Agency active in such efforts and the one monitoring the efforts of the ten-year plan (HPAC, 2014a). However, the CoC’s strategy for preventing homelessness was unclear in the application. State law mandates and local county plans appeared to structure the discharge of individuals from corrections, mental health, and foster care, thereby limiting the HPAC’s involvement. The CoC detailed that they consult with Emergency Solutions Grant program recipients, which received funding in 2012 for a Homelessness Prevention and Rapid Re-housing project, but that funds are highly competitive for this grant and are limited. Other than the preventative programs from the Emergency Solutions Grant and the regular homeless services provided, the HPAC stated in their application that they



would work with the Family Resource Centers and the Homeless Liaison of the Yolo County Office of Education to help in prevention efforts (HPAC, 2014a).

When it comes to housing procedures, the HPAC met several of HUD's requirements. The HPAC had sought out a housing first approach in line with their ten-year plan goal of housing. Specifically, the HPAC described all of their permanent supportive housing programs as operating with this approach but that they lacked enough permanent supportive housing beds to keep homeless in the housing type that met their particular needs. The HPAC also stated that they had a Coordinated Assessment System to match the homeless with the appropriate housing type and services that fit their needs. However, at the time of the application, the system was in the process of being updated (HPAC, 2014a). Additionally, they boasted a lack of entry barriers into CoC funded programs, including housing, but promised to perform further trainings and conduct a survey for greater assurance (HPAC, 2014a). Lastly, the HPAC stated that they had procedures to provide fair housing, policies to ensure school enrollment of children in homeless programs, and housing that guaranteed all families with children remained unseparated (HPAC, 2014a).

Despite the HPAC's strategic efforts and housing provision services appearing to align with HUD's preferences, there are some areas where they may have fallen short of HUD's expectations. Some point loss may have occurred due to a lack of detail. While the HPAC specified that they included the goal of preventing homelessness in their ten-year plan, they did not provide HUD with a detailed description of the strategy to achieve this. Additionally, the HPAC did not explicitly state that they were coordinating with

other funding sources and did not detail the exact procedures for how they were furthering fair housing. They also did not identify alternative sources other than HUD CoC funding for supportive services, instead stating instead a vague plan— “We will continue to explore this” (HPAC, 2014a) — while also describing the need that CoC programs have for such funds. Lastly, the HPAC may have lost points for not having a functioning Coordinated Assessment System, since their system was in the process of being updated at the time of the application.

### **Recipient Performance**

For the Recipient Performance criterion, the HPAC received their lowest proportional score of all the categories, with 4 points out of a possible 15.

*Table 5.6:*

Application Responses of the HPAC for the Scoring Criteria of the Recipient Performance Category

<b>Recipient Performance: HPAC received 4 points out of 15 Maximum Points Possible</b>	
<b>3 Points Possible</b>	<b>Performance Monitoring</b>
The HPAC Technical Committee reviews yearly the Annual Performance Reports of projects provided to HUD to assess their performance and offer recommendations for the next year. The HPAC acknowledged that due to the growing number of projects in their CoC, including Emergency Solutions Grant projects, they needed a more “stringent process”. They stated that a sub-committee was currently developing a process as well as performance measures.	
<b>3 Points Possible</b>	<b>Increasing Performance</b>
The HPAC stated that they educate project recipients regarding HUD performance goals. The HPAC planned, once their new HMIS system was in place, that they would provide quarterly reports to project recipients to allow for review and tracking of their performance.	
<b>3 Points Possible</b>	<b>Increasing Capacity</b>
If a program does not perform well regarding a performance measure, the HPAC stated that they perform quarterly follow-ups and that other agencies provide assistance to improve their performance.	
<b>3 Points Possible</b>	<b>Reducing Homeless Episodes</b>

The HPAC offered four ways in which they planned to reduce the time people are homeless. This involved the full implementation of their updated HMIS and Coordinated Assessment System as well as more rapid re-housing projects. Additionally, the HPAC planned to continue working with the Specialized Multiple Advocates Resource Team-Yolo (SMARTY) program that aids in providing enrollment assistance for SSI/SSDI.	
<b>1 Points Possible</b>	<b>Outreach</b>
The HPAC did not specify any outreach procedures. Rather they described that outreach occurs primarily through referral and the general knowledge in the homeless community of their existence. As of 2013, the three main cities in the CoC had a prominent homeless service provider described by HPAC as “well-known and located in easy-to-find locations”. Additionally 2-1-1 information services, public librarians, as well as other homeless refer people in need of services. The HPAC stated that the Coordinated Assessment System would help with outreach.	
<b>2 Points Possible</b>	<b>Tracking and Reducing Returns to Homelessness</b>
As of 2013, the HPAC had not been tracking returns to homelessness across the CoC, rather this had been done by project providers. However, the HPAC stated that they would utilize the new HMIS and Coordinated Assessment System to start tracking.	

Source: Adapted from HPAC (2014a).

The performance monitoring of the HPAC appeared in transition. The general procedure of the HPAC had been to review the Annual Performance Reports of each project recipient once a year and then discuss improvement strategies with that recipient. However, the CoC acknowledged that as the number of their programs increased a more “stringent process” had become necessary and that a sub-committee would establish this process in the future (HPAC, 2014a). Additionally, the updating and implementation of their Homeless Management Information System and Coordinated Assessment System appeared to have limited their ability to monitor performance of project recipients. Specifically, there did not appear to be a clear procedure for assisting underperforming CoC project recipients. To fix this in the future the HPAC detailed its plan to issue quarterly performance reports with its updated Homeless Management Information System to help its project recipients achieve performance goals.

The performance of the HPAC itself faced limitations due to their transition to a new Homeless Management Information System and the updating of their Coordinated

Assessment System. Many of the HPAC's responses listed how the full implementation of these systems would assist in their homeless service provision but ultimately, this meant that they were not using these systems for such means in the FY 2013 grant competition. Specifically, in their efforts to reduce the length of time that individuals remain homeless, the HPAC described plans that included utilizing their new Homeless Management Information System and updated Coordinated Assessment System as well as developing more rapid re-housing programs. The only currently used plan mentioned by the HPAC was assisting homeless in obtaining Social Security income. Similarly, the HPAC stated their plans to start tracking returns to homelessness for their entire region with the new and updated systems. The HPAC also described the assistance that the Coordinated Assessment System would provide in their outreach to homeless (HPAC, 2014a).

Overall, it appears that most of the criteria in this category may have suffered from the lack of a utilized and thorough process as well as the lack of a fully operating Homeless Management Information System and Coordinated Assessment System. There did not appear to be currently utilized plans for the criterion of Performance Monitoring, Increasing Capacity, Reducing Homeless Episodes and Outreach. In addition, not having a presently functioning Homeless Management Information System and Coordinated Assessment System left the HPAC without the data to fulfill the criteria of Increasing Performance, Reducing Homeless Episodes, and Tracking and Reducing Returns to Homelessness.

## CoC Housing, Services and Structure

Proportionally, the HPAC received their third highest score in the CoC Housing, Services and Structure category.

*Table 5.7:*

Application Responses of the HPAC for the Scoring Criteria of the CoC Housing, Services and Structure Category

<b>CoC Housing, Services and Structure: HPAC received 9.25 points out of 13 Maximum Points Possible</b>	
<b>2 Points Possible</b>	<b>CoC Meetings</b>
The HPAC conduct bi-monthly meetings for the entire CoC. They invite new members to the CoC publicly every year and, as of 2013, the membership included at least one homeless or formerly homeless person to serve as an advisor, volunteer and/or organizational employee.	
<b>2 Points Possible</b>	<b>Complaints</b>
The HPAC had received no complaints prior to their application submission.	
<b>2 Points Possible</b>	<b>Inclusive Structure</b>
The HPAC described their CoC as inclusive in the creation of its committees; claiming that they seek a diversity of organizations. The main cities in the CoC each had a main homeless service provider that received CoC and ESG funds.	
For the application process, the Homeless Coordinator announces available funds each year to potential new applicants and meets with them to discuss eligibility. However, the extent of the process and announcement was unclear.	
<b>2 Points Possible</b>	<b>Project Application Performance Metrics</b>
The Technical Committee of the HPAC reviews Annual Performance Reports from projects once submitted. Discussions regarding their performance occur at that time based on the Annual Performance Report information. The application states that greater analysis was limited due to a poor HMIS. However, they were in the process of implementing a new system and planned to improve as well as create better performance metrics.	
<b>1 Point Possible</b>	<b>Accuracy of Grant Inventory Worksheet</b>
The CoC attached the Grant Inventory Worksheet during the grace period, but made changes to fix inaccuracies prior to its grace period submittal.	
<b>3 Points Possible</b>	<b>Ranking and Selection Process</b>
For project ranking and selection, the HPAC reviews the funding available, including any Annual Renewal Demand cuts announced by the HUD NOFA, and discusses any new projects along with the performance of current projects based on their Annual Performance Reports. The entire HPAC then decide and approve the project selection, project ranking, and funding cuts based on the priorities of HUD and HPAC.	

<b>1 Point Possible</b>	<b>Housing Inventory Count Submission</b>
The CoC submitted their Housing Inventory Count on time.	

Source: Adapted from HPAC (2014a).

The composition and structure of the HPAC appeared to meet the requirements of HUD. They claimed a membership that included many types of stakeholders. The HPAC also did not experience any complaints for the year leading up to the competition and submitted their Grant Inventory Worksheet and Housing Inventory Counts on time (HPAC, 2014a).

When it comes to the performance measures and project ranking of the HPAC, some of their procedures were unclear. While there was a general process for ranking and selection of projects, the HPAC admitted that limitations from the prior Homeless Management Information System provider left analysis of projects constrained. They also did not indicate if their ranking and selection process contained objective criteria and had written policies and procedures with “dated meeting minutes” as HUD requests (HUD, 2013d). Similarly, while CoC funding can be rare for new projects, it was unclear in the application how exactly the HPAC reaches out and includes potential new agencies. The HPAC stated that they recently obtained a new Homeless Management Information System provider and planned to implement greater processes incorporating performance measures and Emergency Solutions Grant projects (HPAC, 2014a). As a result, the loss of points for this category may have been in the criteria of Project Application Performance Metrics, Ranking and Selection Process, and Inclusive Structure, since these processes did not appear thorough or did not provide enough detail to ensure their thoroughness.

## Leveraging

The HPAC received the full points available for this category. This is the only category in which they received the full amount of points possible.

*Table 5.8:*

Application Responses of the HPAC for the Scoring Criteria of the Leveraging Category

<b>Leveraging: 5 Total Category Points: HPAC received 5 points out of 5 Maximum Points Possible</b>	
<b>5 Points Possible</b>	<b>Leveraging</b>
The HPAC received the full 5 points for this category indicating that all of their project applications leveraged resources outside of the CoC grant of at least 150%.	

Source: Adapted from HPAC (2013a).

According to the CoC Program NOFA, CoCs that received the maximum points for leveraging had all project applicants leveraging funds with a total leveraging for the CoC of at least 150% (HUD, 2013d). Ultimately, this means that the HPAC project applicants adequately utilized other sources of funding and services outside of the CoC, thereby reducing their reliance on CoC grant funding.

## Homeless Management Information System (HMIS)

The Homeless Management Information System (HMIS) is the data collection system that HUD requires CoCs to maintain and utilize. For this category, the HPAC received 7 out of the 11 points possible.

It appears that the HPAC was in a position of transition to their new system of HMIS, leaving them unable to meet all the criteria for the category. According to their application, the new HMIS had a charter with a clear definition of roles and responsibilities. The HPAC also checks the quality of the data quarterly and had low

Table 5.9:

Application Responses of the HPAC for the Scoring Criteria of the Homeless Management Information System (HMIS) Category

<b>Homeless Management Information System (HMIS): HPAC received 7 points out of 11 Maximum Points Possible</b>	
<b>2 Points Possible</b>	<b>HMIS Governance</b>
At the time of the application, the HPAC had a governance charter for the HMIS with the HMIS Lead. The CoC stated affirmatively that responsibilities, of both the CoC and Lead, were included in the charter as well as the recent HMIS requirements.	
<b>1 Points Possible</b>	<b>HMIS Plans</b>
As of 2013, the HPAC did not have privacy, security or data quality plans. However, they stated they were in the process of creating and implementing such plans with the new HMIS provider.	
<b>2 Points Possible</b>	<b>HMIS Funding</b>
The HPAC funded its HMIS entirely through participations fees with no CoC grant funding.	
<b>2 Points Possible</b>	<b>Bed Coverage</b>
In 2013 the HPAC had four different types of housing with various bed coverage rates: emergency shelter 86%+, transitional housing beds 86%+, rapid re-housing beds 86%+, permanent supportive housing beds 65-75%. None of the housing types were 64% or below in their bed coverage rate.	
<b>2 Points Possible</b>	<b>Data Quality</b>
The CoC stated that they review data quality quarterly. The HMIS Lead also reviews the data and meets with program agencies to fix any issues. The Homeless Coordinator follows up on such issues and in the future will provide reports on the HMIS of projects to the HMIS Collaborative workgroup. Additionally, the HPAC indicated low percentages of missing or null values for homeless clients during a day in the 2013 PIT Count; less than 10%.	
<b>1 Point Possible</b>	<b>Entry and Exit Dates</b>
At the time of the application, the HMIS of the HPAC did not have a Policy and Procedures Manual that incorporated policy on the accuracy of entry and exit date data.	
<b>1 Point Possible</b>	<b>Required Reports</b>
With the new HMIS system, the HPAC had used it to generate Annual Performance Reports but had not yet used the system to generate other reports as required. However, the HPAC stated that the new HMIS system has the capability to generate the required reports.	

Source: HPAC (2013a).

missing or null values in their PIT Count for a given day. Additionally, their bed coverage rates were above the 64% threshold; this refers to the number of beds in housing monitored by the HMIS and divided by all the beds for homeless in the CoC



region for a year (HUD, 2013d). HUD awarded up to 2 points in the Bed Coverage criterion for CoCs that had a bed coverage rate at 86% or greater (HUD, 2013d). The HPAC's permanent supportive housing is the only type of housing in the CoC that did not meet this requirement and this ultimately may have resulted in a reduction in points. Otherwise, the HPAC may have also lost points in this category for the criteria of HMIS Plans, Entry and Exit Dates, and Required Reports.

### **Point-In-Time Count**

In accordance with HUD's interest in data collection, they awarded up to 9 points to CoCs for gathering Point-in-Time Count (PIT) data. The HPAC received high marks in this category likely due to a thorough 2013 PIT Count.

*Table 5.10:*

Application Responses of the HPAC for the Scoring Criteria of the Point-In-Time (PIT) Count Category

<b>Point-In-Time (PIT) Count: HPAC received 8 points out of 9 Maximum Points Possible</b>	
<b>3 Points Possible</b>	<b>PIT Count and Data Submission</b>
The HPAC conducted the PIT Count in the last 10 days of the month of January, counted both sheltered and unsheltered homeless, submitted the data in the HUD Homeless Data Exchange (HDX) system on time, and listed the percentages of service providers that gave data.	
<b>2 Points Possible</b>	<b>Change in PIT Since 2012</b>
As the HPAC only performs biannual PIT Counts, they compared their 2011 PIT Count to the most recent 2013 PIT Count. The HPAC showed an increase in the sheltered population of 26 people. They correlated this to the increase in available housing thereby reducing the number of unsheltered homeless. Their unsheltered population showed a decrease of 65 people which the HPAC attributed potentially to more permanent supportive housing, the economic turnaround as well as their efforts at connecting homeless to Social Security benefits.	
<b>2 Points Possible</b>	<b>Subpopulation Data</b>
The HPAC stated that they ensured the collection of accurate and quality data of sheltered homeless using provider expertise and interviews. Some providers used case information or HIV/AIDS information to help fill out the homeless count forms. For interviews, the interviewers received training and filled out the count forms for the homeless to ensure correctness.	

<b>2 Points Possible</b>	<b>Methodology for Unsheltered Count</b>
The HPAC ensured the quality of the data, that no duplication occurred, by providing training, using survey questions, noting unique identifiers, having interviewers carefully observe the homeless during the count, and utilizing a chart listing the times and locations of the homeless counted.	

Source: Adapted from (HPAC, 2014a).

The CoC performed their PIT Count in 2013 in accordance with the requirements of HUD. Specifically, they conducted the PIT Count in the last 10 days of the month of January, counted both sheltered and unsheltered homeless, submitted the data into the Homelessness Data Exchange system on time, and listed the percentages of service providers that gave data (HPAC, 2014a). The HPAC also made careful preparations and utilized methods to ensure that the sheltered and unsheltered data was accurate in accordance with HUD's specifications.

Lastly, the HPAC's PIT Count showed a potential reduction in the number of homeless people since their prior PIT Count. The HPAC only performs biennial PIT Counts and therefore, on their application, they compared their 2011 PIT Count to the most recent 2013 count. The HPAC showed an increase of 26 in the sheltered population. They credited this to an increase in available housing that subsequently reduced the number of unsheltered homeless (HPAC, 2014a). Their unsheltered population showed a decrease of 65 people which the HPAC attributed to more permanent supportive housing, the economic turnaround, and their efforts at connecting homeless to Social Security benefits. However, they also acknowledged that the unsheltered number might be low due to police visits on homeless camps not long before the actual PIT Count in West Sacramento and the difficulty in locating the homeless in Davis who moved to more remote locations (HPAC, 2014a).

## Bonus Points

Outside of the seven categories mentioned, up to 6 bonus points were possible for the CoC Program competition. As stated previously, the bonus points may well be subject to fluctuation every year and therefore, may not have much weight in analyzing future scoring rounds. Nonetheless, the HPAC received 4 bonus points.

*Table 5.11:*

### Application Responses of the HPAC for the Scoring Criteria of the Bonus Points

<b>Bonus Points: HPAC received 4 points out of 6 Maximum Points Possible</b>	
<b>2 Points</b>	<b>Administration</b>
All projects requesting funding from the CoC through the HPAC, requested less than 7% in administration costs of their overall funding request.	
<b>2 Points</b>	<b>SSO Projects</b>
No SSO projects were prioritized in Tier 1 by the HPAC.	
<b>2 Points</b>	<b>Accuracy of Submission</b>
Officials from the City of Davis, City of Woodland and the California Department of Housing and Community Development all submitted project applications on the Form HUD-2991. This form certified that the projects aligned with the Consolidated Plan for their jurisdiction.	

Sources: Adapted from City of Davis (2014), City of Woodland (2014a, 2014b, 2014c, and 2014d), United Christian Centers of the Greater Sacramento Area, Inc. (2014), Yolo Community Care Continuum (2014), and HPAC (2014a).

It appears that the HPAC met the requirements for all three of the categories. All of the project applicants requested 7% or less in administration costs for their projects, the HPAC also prioritized only permanent supportive housing and transitional housing projects in their Tier 1, and officials from the main jurisdictions in the HPAC certified that the projects aligned with the Consolidated Plan for their jurisdiction. However, since the HPAC only received 4 out of the 6 points possible for this category, it appears that HUD found fault with one of these criteria. My estimation is that HUD may have found fault in the Accuracy of Submission criterion; specifically in the accuracy of the Form

HUD-2991. I singled out this criterion because it is the most subjective of the three criteria leaving HUD as the sole determiner regarding what they consider an accurate submission.

### **Deficiencies in the HPAC's Application**

In comparing the HPAC's application responses to the scoring criteria of the CoC Program for the FY 2013-FY 2014 competition, I identified areas of deficiency that may have resulted in a loss of points for the HPAC. A summary of all the criteria in the grant competition along with deficiencies detected in the HPAC's application responses is listed in Table 5.12. Specifically, I identified four general areas of deficiency that may have resulted in a loss of points for the HPAC. These four areas are transition to the new Homeless Management Information System and the updated Coordinated Assessment System, absence of detailed plans and procedures, limited increases in the amount of permanent housing, and a lack of detail in some of the application responses.

*Table 5.12:*

Summary of Deficiencies Identified in the HPAC's Application Responses for Each of the CoC Program Scoring Criteria.

<b>Category and Criteria</b>	<b>Points Possible</b>	<b>Deficiencies in the HPAC's CoC Application Responses</b>
<b>CoC Strategic Planning and Performance</b>	<b>69</b>	
<i>Ending Chronic Homelessness</i>	16	The HPAC estimated a low increase in permanent supportive housing and had a vague plan to implement further increases. Limited funding for permanent supportive housing appeared to be the issue.
<i>Housing Stability</i>	10	The HPAC appeared to meet the basic criteria but the HPAC estimated no increase in performance due to a limited number of permanent supportive housing beds. The CoC listed their use of the new HMIS as an improvement strategy.

<i>Jobs and Income Growth</i>	8	The HPAC's estimates for increasing participant income from sources other than employment were significantly below HUD's standards. This could have been a problem with HUD's measurement timeline, focusing on only entry and exit dates of homeless thereby excluding any outreach prior to their entry, rather than the HPAC's performance. The CoC listed their use of the new HMIS as an improvement strategy.
<i>Mainstream Benefits</i>	7	The HPAC's present performance and estimates for future performance were below HUD's standards. The CoC listed their use of the new HMIS as an improvement strategy.
<i>Rapid Re-housing</i>	10	The HPAC did not estimate an increase for rapid re-housing due to a lack of funding for more housing projects.
<i>Opening Doors</i>	3	No apparent deficiency.
<i>Ending Family Homelessness</i>	4	No apparent deficiency.
<i>Addressing the Needs of Victims of Domestic Violence</i>	2	No apparent deficiency.
<i>Ending Youth Homelessness</i>	2	No apparent deficiency.
<i>Reaching Unsheltered Homeless</i>	3	The outreach plan of the HPAC was limited almost entirely to referrals.
<i>Ending Veteran Homelessness</i>	4	The HPAC had a lack of detail regarding their future coordination plan for the homeless.
<b>Coordination of Housing and Services</b>	<b>28</b>	
<i>Preventing Homelessness</i>	2	The HPAC had a lack of detail regarding their strategy to prevent homelessness. The HPAC did not describe their success at reducing families who become homeless, as desired by HUD. Limited rapid re-housing in the region could have been a source of the problem as well as a lack of data through HMIS.
<i>Discharge Planning</i>	4	No apparent deficiency.
<i>Consolidated Plan</i>	2	No apparent deficiency.
<i>Emergency Solutions Grant Coordination</i>	3	No apparent deficiency.
<i>Coordination with Other Funding Sources</i>	1	The HPAC's response lacked detail.
<i>Public Housing Agencies</i>	2	No apparent deficiency.
<i>Housing First Approach</i>	3	The HPAC stated difficulty in their implementation of Housing First due to limited numbers of permanent supportive housing units.

<i>Centralized or Coordinated Assessment System</i>	2	The Coordinated Assessment System of the HPAC was in the process of updating at the time of the application. The HPAC stated limited housing as an impediment to accurate targeting of housing for homeless subpopulations.
<i>Affirmatively Furthering Fair Housing</i>	2	The HPAC's response lacked detail.
<i>Educational Assurances</i>	2	No apparent deficiency.
<i>Preventing Involuntary Family Separation</i>	2	No apparent deficiency.
<i>Affordable Care Act</i>	1	No apparent deficiency.
<i>Resources for Services</i>	2	The HPAC indicated no clear plan for identifying alternative sources of funding for supportive services.
<b>Recipient Performance</b>	<b>15</b>	
<i>Performance Monitoring</i>	3	The HPAC acknowledged their need for a more "stringent" performance review process.
<i>Increasing Performance</i>	3	The HPAC listed their use of the new HMIS as an improvement strategy.
<i>Increasing Capacity</i>	3	The HPAC provided a vague plan for how they and other agencies assist in increasing a project's capacity. The application response also lacked detail.
<i>Reducing Homeless Episodes</i>	3	The HPAC stated a future rather than currently utilized plan for reducing homeless episodes. They listed implementation of this plan, use of HMIS, and increased rapid re-housing as improvement strategies.
<i>Outreach</i>	1	The HPAC had no detailed outreach process outside of referrals. The HPAC stated the use of their updated Coordinated Assessment System as an improvement strategy.
<i>Tracking and Reducing Returns to Homelessness</i>	2	At the time of the application, the HPAC was not tracking returns to homelessness across the CoC. The HPAC stated the use of their updated Coordinated Assessment System as an improvement strategy.
<b>CoC Structure and Governance</b>	<b>13</b>	
<i>CoC Meetings</i>	2	No apparent deficiency.
<i>Complaints</i>	2	No apparent deficiency.
<i>Inclusive Structure</i>	2	The HPAC's response lacked detail regarding their process of outreach to potential new applicants.
<i>Project Application Performance Metrics</i>	2	The HPAC stated that analysis of project performance was limited by a poor HMIS. Therefore, the HPAC listed greater use and incorporation of the new HMIS as an improvement strategy.
<i>Accuracy of Grant Inventory Worksheet</i>	1	No apparent deficiency.

<i>Ranking and Selection Process</i>	3	The HPAC's response lacked detail regarding whether they use objective criteria and have published written policies and procedures with dated meeting minutes as HUD requests. Their process may have not included these.
<i>Housing Inventory Count Submission</i>	1	No apparent deficiency.
<b>Leveraging</b>	<b>5</b>	
<i>Leveraging Resources</i>	5	No apparent deficiency.
<b>Homeless Management Information System</b>	<b>11</b>	
<i>HMIS Governance</i>	2	No apparent deficiency.
<i>HMIS Plans</i>	1	The HPAC did not have these HMIS plans in place at the time of the application.
<i>HMIS Funding</i>	2	No apparent deficiency
<i>Bed Coverage</i>	2	The HPAC had a bed coverage rate for permanent supportive housing below HUD's ideal of 86% or greater.
<i>Data Quality</i>	2	No apparent deficiency.
<i>Entry and Exit Dates</i>	1	The HPAC had no policy for recording entry and exit dates in HMIS at the time of the application.
<i>Required Reports</i>	1	The HPAC stated that they had not yet generated all HUD required reports but that the new HMIS would be able to.
<b>Point in Time Counts</b>	<b>9</b>	
<i>2013 PIT Count and Data Submission</i>	3	No apparent deficiency.
<i>Reduction in PIT Since 2012</i>	2	No apparent deficiency.
<i>Subpopulation Data</i>	2	No apparent deficiency.
<i>Methodology for Unsheltered Count</i>	2	No apparent deficiency.
<b>Bonus Points</b>	<b>6</b>	
<i>Administration</i>	2	No apparent deficiency.
<i>No SSO Projects in Tier 1</i>	2	No apparent deficiency.
<i>Accuracy of Submission</i>	2	While I detected no apparent deficiency, determining accuracy is subjective and therefore HUD may have found a deficiency.

## **Transition to the Homeless Management Information System and Coordinated Assessment System**

The HPAC appeared unable to meet some of HUD's scoring criteria due to their transition to a new Homeless Management Information System (HMIS) and an updated Coordinated Assessment System. The HPAC potentially lost points for these systems not fully operating, since there were specific criteria that addressed this. Additionally, many of the HPAC's responses listed how the full implementation of these systems would assist them in meeting the criteria in the future. This meant that the HPAC was not using these systems for such means in the FY 2013 grant competition. Ultimately, this may have kept them from receiving points for those criteria.

The lack of the HMIS specifically may have affected the points that the HPAC received for many criteria. The HPAC may have lost points for the lack of the system hindering the development and subsequent review of performance of project recipients. Also the lack of the HMIS left the HPAC without the criteria requirements of HMIS privacy, security, and data quality plans, a HMIS Policy and Procedures manual with a policy for entry and exit date recording, and the use of HMIS to generate HUD required reports (HPAC, 2014a). Essentially, the full operation of the HMIS and Coordinated Assessment System would have better aligned the HPAC with some of HUD's scoring criteria.

## **Absence of Detailed Plans and Procedures**

Another potential deficiency in the HPAC's application was the lack of a structured plan or procedure for achievement of some of the specific scoring criteria.



Many of HUD's scoring criteria request that the applicant provide a description of their current plan or procedure to achieve the criteria in question. For some of these criteria the plan of the HPAC was vague or undeveloped. For example, in response to HUD's inquiry regarding a CoC's plan for identifying alternative sources of funding for supportive services, the HPAC did not provide a plan but stated rather that they, "[Would] continue to explore this" (HPAC, 2014a).

This issue appears most evident in the Recipient Performance category, where the HPAC received its lowest proportional score out of all of the categories. Under this category, the HPAC acknowledged that they needed a more "stringent process" for monitoring project recipients' performance as well as the development of performance measures (HPAC, 2014a). Similarly, the HPAC provided general but vague plans regarding how they assist underperforming project recipients and provided no real plan for homeless outreach. Lastly, in response to HUD's question regarding the actions that the CoC had taken to reduce the time people are homeless, the HPAC provided a detailed plan mostly listing their future efforts; this indicated that there was no currently utilized plan. However, it is worth it to note that the transition to the HMIS and Coordinated Assessment System may have contributed to the lack of plans and procedures, especially with regard to performance monitoring and reducing the amount of time people are homeless.

### **Limited Ability to Increase Permanent Housing**

The HPAC pointed out in their application the challenges they faced in aligning with the expectations of HUD's scoring criteria due to the limited funding available for

increasing permanent housing; referring to both permanent supportive housing and rapid re-housing. HUD has a clear priority of permanent supportive housing, especially for the chronic homeless, as well as rapid re-housing for families with children. In their application, the HPAC listed an estimated increase of one permanent supportive housing bed by 2015 and no estimated increase in the number of families served in rapid re-housing projects by 2015. They stated that the limited funding available for permanent housing in the CoC grant as well as the high competition and low availability for rapid re-housing funds in the Emergency Solutions Grant, made an increase in permanent housing unlikely (HPAC, 2014a). This potentially led to a significant decrease in points for the HPAC.

The CoC Strategic Planning and Performance scoring category is worth the highest amount of points and includes criteria that evaluate use of permanent housing. The three most valuable criteria in this category examine the planning and performance of a CoC in utilizing permanent housing to end chronic homelessness, achieve housing stability, and rapidly house homeless families with children (HPAC, 2014a). Despite describing methods outside of the CoC grant funding that they would try, the HPAC estimated low increases in performance for all three of these criteria because of their limited permanent supportive housing beds and rapid re-housing projects and the unlikelihood that more will be created.

The HPAC also described how the limited amount of permanent housing makes implementation of the Housing First Approach and Coordinated Assessment System in their region more difficult. The idea behind these methods is that the placing of

individuals in housing occurs more quickly and that the type of housing chosen best suits their needs. However, with limited housing options available, especially for permanent housing and rapid re-housing, the HPAC must place homeless in the best fit available.

### **Lack of Detail**

A potential deficiency in the HPAC application is the lack of detail provided in some of their question responses. HUD expects detailed responses to their application questions, allowing up to 1,000 words for each response. HUD specified in their 2013 CoC Debriefing Summary, that many CoCs in the competition did not fully answer the questions and did not provide enough detail to warrant full points. To receive full points, HUD stated that responses should include, "...a list of specific steps, detail on how each step would be accomplished and by when, and who was responsible for implementing the steps." (HUD, n.d.-b). In their application, the HPAC often gave succinct and general answers to the questions, sometimes without providing much detail and answering in much less than the 1,000-word maximum. The HPAC's responses regarding their coordination with other funding sources, ways they are ensuring fair housing, their application process, and even their plan for preventing homelessness, are all examples of this. However, it is possible that the lack of detail was the result of a clear procedure not existing for the HPAC for those criteria.

### **Conclusion**

By comparing the scoring criteria of the 2013-FY 2014 CoC Program to the application of the HPAC, I identified some potential deficiencies. These deficiencies surround the HPAC's transition to a new Homeless Management Information System and

an updated Coordination Assessment System, an absence of detailed plans and procedures, their limited ability to increase permanent housing, and a lack of detail in their application responses. While the score received by the HPAC for the FY 2013-FY 2014 CoC grant competition did not affect their projects being funded, a similar score could negatively affect project funding in the future. For that reason, the HPAC should improve upon these deficiencies in order to improve their score.

## Chapter Six

### RECOMMENDATIONS

The analysis from the prior chapter displayed deficiencies in the HPAC's application that may have resulted in a diminished score for the FY 2013-FY 2014 grant competition. In this chapter, I expand on the prior analysis by providing recommendations to assist the HPAC in increasing their CoC Program score. I begin by describing the potential priorities of HUD for future competitions; then I provide specific recommendations for the HPAC based on the knowledge of national best practices, the HPAC's application deficiencies, and the potential priorities of HUD in the future. Finally, I discuss how an improved score for the HPAC may affect their project funding in the CoC Program. Ultimately, through implementing such recommendations, the HPAC may improve its application score for the CoC Program, through better alignment with the scoring criteria and priorities of HUD, so that it may retain its project funding and potentially increase funding through bonus projects.

#### **Future Focus for the CoC Program**

HUD has announced several areas as priorities for the future of the CoC Program competition. In a March 2015 message, Norm Suchar, the Director of the Office of Special Needs Assistance Programs for HUD, reiterated the department's mission to achieve the goals of the federal *Opening Doors* plan to prevent and end homelessness. Specifically, Suchar stated that HUD plans to end veteran homelessness in 2015, chronic homelessness in 2017 and family homelessness in 2020 (Suchar, 2015). With these deadlines fast approaching, the director warned that HUD, "...will be taking big steps to

reach these goals” (Suchar, 2015). While not stating the steps explicitly, Suchar specified that the department will continue to work on such projects as Housing First, permanent supportive housing, and rapid re-housing (Suchar, 2015). Additionally, he announced that the Office of Special Needs Assistance Programs will release further messages regarding the Centralized or Coordinated Assessment System, performance measures, transitional housing and other topics (Suchar, 2015).

HUD has released some information regarding two of the upcoming changes for the grant program with regard to the Centralized or Coordinated Assessment System and performance measures. HUD has recently changed the term for Centralized or Coordinated Assessment System to the new term Coordinated Entry. HUD states that CoCs will need to use the system to aid in prioritizing subpopulations for housing, especially the chronically homeless for permanent supportive housing (HUD, 2015a). Specifically, HUD will be releasing guidelines in the summer of 2015 that will “establish requirements” and “timelines for implementation” (HUD, 2015a).

In addition to this system, HUD will be placing greater focus on “system-level” performance. The HEARTH Act established six performance measurements that are included in the CoC Program scoring criteria along with two others developed by HUD (HUD, 2014i). These measures help HUD to evaluate nationwide progress at meeting the goal to end homelessness while also allowing CoCs a tool for assessing gaps in their own performance (HUD, 2014j). Data from the PIT Count and the Homeless Management Information System is used for these measures and HUD hopes to incorporate Coordinated Entry information in the future as well. While some of these measures are

scored using narrative responses from CoCs, HUD may require numerical data in future competitions (HUD, 2014i). Ultimately, it appears that HUD will use Coordinated Entry and performance measures to continue promoting the nationwide best practices of Housing First, targeting services to provide “just enough” assistance, and encouraging a strategic local planning.

While HUD has not released an official statement regarding the upcoming changes for transitional housing, the FY 2013-FY 2014 NOFA provides some indication that HUD will push for decreased use of transitional housing among CoCs. The NOFA details how, while transitional housing can be effective in assisting the needs of specific subpopulations, some research has found it to have entry requirements that make it difficult for many homeless to qualify and that the housing subpopulation may be better served with less cost through rapid re-housing (HUD, 2013d). As a result, HUD asks CoCs to examine their transitional housing to determine if rapid re-housing is a better alternative (HUD, 2013d). Therefore, in the future, it is likely that HUD will further encourage CoCs to evaluate and potentially reduce their transitional housing usage in favor of rapid re-housing models.

### **Recommendations for the HPAC**

I based the following recommendations on HUD’s use of the nationwide best practices described in the literature review, the deficiencies of the HPAC’s application as identified in the analysis, and the future priorities of HUD. As formerly stated, the information regarding the housing and service provision of the HPAC is based on their application responses for FY 2013 and therefore does not reflect any potential changes

made by the HPAC since their application submission. When it comes to their CoC application responses compared to the scoring criteria, I identified four areas of deficiency: transition to a new Homeless Management Information System and an updated Coordinated Assessment System, absence of detailed plans and procedures, limited increases in their permanent housing, and a lack of detail in some of their application responses.

As discussed previously, it would be beneficial to look at the applications of comparable CoCs to the HPAC that received high scores in the FY 2013-FY 2014 grant competition. This would allow for greater recommendations regarding the improvement of deficiencies of the HPAC as identified in the analysis. However, since very few CoCs release their scores publicly, the amount of high scoring CoCs with a publicly available application and copy of their scores for the FY 2013- FY2014 competition is extremely limited—especially for finding a CoC that serves a region comparable to that of the HPAC. Therefore, in my recommendations, I draw upon the national best practices, the HPAC’s application deficiencies, and the knowledge regarding HUD’s future priorities. Ultimately, I expanded my prior deficiency determinations into four general categories with specified recommendations: Homeless Management Information System and Coordinated Entry System, Planning and Procedures, Permanent Housing, and the CoC Application.

### **Homeless Management Information System and Coordinated Entry System**

**Fully implement the Homeless Management Information System and the Coordinated Entry System.** The full implementation of the Homeless Management



Information System and the Coordinated Entry System would help to improve the score of the HPAC. These systems are of great importance to HUD in achieving the goal of preventing and ending homelessness and their importance to HUD for future competitions will likely increase. They function as a tool to assist in supporting the national best practices for connecting homeless to “just enough” assistance and in informing efforts at strategic logic response. The scoring criteria of HUD also provide points for having and using these systems. Additionally, these systems inform HUD regarding CoC performance and help CoCs to improve their performance. The HPAC frequently included their intent to utilize these systems to improve their performance, especially under the scoring criteria for the CoC Strategic Planning and Performance category, where they received their lowest score. By actually using these systems as stated to improve their performance, the CoC’s score would likely improve.

In implementing the Homeless Management Information System (HMIS), the HPAC should take some specific actions. Based on their application responses, in addition to utilizing the updated system, the HPAC needs to develop its HMIS privacy, security and data quality plans, create an HMIS Policy and Procedures manual with a policy for entry and exit date recording, and utilize the HMIS to generate HUD required reports. The HPAC should also strive to increase the number of homeless beds counted in its HMIS to increase its bed coverage rate, particularly its permanent supportive housing bed coverage rate of 65-75% (HPAC, 2014a), which is below HUD’s 86% target rate (HUD, 2013d).

The Coordinated Entry system has less of a defined plan for implementation. This system is relatively new to the CoC Program, having only been required as of 2012, and HUD has stated that they will be releasing more detailed information regarding requirements as well as implementation deadlines in the summer of 2015 (HUD, 2015a). Therefore, the HPAC must implement this system to both meet the upcoming requirements of HUD and to aid in proper targeting of homeless to the services that are “just enough” for their needs. The HPAC should implement the system in accordance with any requirements released by HUD including their preferences regarding how the system prioritizes subpopulations of homeless (HUD, 2014f). Additionally, CoCs may obtain funding for the Coordinated Entry system through the Homeless Management Information System. According to HUD, CoCs may combine the Coordinated Entry system with the Homeless Management Information System, thereby allowing CoC funds that are requested for costs of the Homeless Management Information System to be used for Coordinated Entry purposes as well (HUD, 2015a).

### **Planning and Procedures**

**Establish detailed plans and procedures.** The HPAC could benefit from establishing more detailed plans and procedures. HUD places great importance on collaborative planning efforts as a national best practice of strategic local response. The HPAC appeared to have some areas of potential weakness, based on the responses in their application, which thorough procedures would fix. I identified most of these areas in the scoring category of CoC Recipient Performance. Specifically under this category, the HPAC should establish a thorough plan for monitoring project recipients’ performance,

assisting underperforming project recipients and for conducting homeless outreach. For outreach planning specifically, HUD appears to be increasing its interest in this area. They are seeking to encourage greater outreach planning for CoCs by including outreach efforts in performance measures (HUD, 2014i) and encouraging CoCs to use outreach in reaching homeless youth (HUD, 2014h).

Outside of the CoC Recipient Performance scoring category, the HPAC could potentially benefit from a more thorough ranking and selection process for projects as well as a plan or procedure for identifying alternative sources of funding for supportive services. The HPAC did not have a clearly defined plan for finding non-CoC funding for supportive services. By finding other funding sources for their supportive services, the HPAC could free up funding for other projects.

**Develop plans that increase performance measure predictions.** Additionally, the HPAC should consider planning that allows for stronger performance measure predictions. Under the CoC Strategic Planning and Performance scoring category, the five criteria worth the highest amount of points were performance measures for ending chronic homelessness, housing stability, jobs and income growth, mainstream benefits, and rapid re-housing. The HPAC estimated few increases in their performance with regard to these criteria, even below the standards of HUD. While the HPAC provided plans as to how they would improve performance in those criteria, further planning efforts may be needed to determine ways to increase their performance to meet HUD's targets; especially since HUD plans to place greater focus on performance measures in the future. The full implementation of the Homeless Management Information System

and Coordinated Entry system should assist in this by helping the HPAC identify ways to improve their performance targets.

**Apply for CoC Planning funding.** HUD allows CoCs to apply for grant funds for one project each competition year to assist in planning for the CoC. Known as CoC Planning, funding may be used for eight project costs: “coordination activities, project evaluation, project monitoring activities, participation in the Consolidated Plan, CoC Application activities, determining [the] geographical area to be served by the CoC, developing a CoC system, [and] HUD compliance activities” (HUD, 2014b). However, a planning project does require matching funds and HUD expects projects to have their activities continue once the CoC grant funding exceeds its allotted term (HUD, 2014b). The HPAC applied for CoC Planning project funds in FY 2012 (HPAC, 2013) but did not apply for funds for a CoC Planning project for FY 2013 or FY 2014. For both of those years the CoC could have applied for around \$6,500 worth of CoC funding (HPAC, 2014b; HPAC, 2014c). By establishing a project in the future and applying for these funds, the CoC could obtain funding for efforts to improve their planning.

### **Permanent Housing**

**Identify alternative sources of funding to increase permanent housing.** The HPAC could increase their score through an increase in their permanent housing, referring to both permanent supportive housing and rapid re-housing. HUD views these housing types as a great priority in the CoC Program. These housing types assist in the achievement of the nationwide best practices of Housing First and of targeting housing to specific homeless subpopulations. In fact, HUD scores CoCs based on their efforts to

increase permanent housing, as evidenced by the CoC Planning and Performance scoring category. This scoring category is worth the greatest amount of points in the competition and contains two highly valuable criteria that measure increases in permanent housing and rapid re-housing. The HPAC estimated low increases for permanent housing in the future and ultimately received their lowest score under this category. Therefore, having and planning to expand permanent housing would greatly assist in increasing their score.

To increase permanent supportive housing units or rapid re-housing projects, the HPAC needs to identify alternative sources of funding. The HPAC described in their CoC Application that funds were limited in the CoC Program and in the Emergency Solutions Grant to increase permanent housing. The HPAC has already been relocating funding from their transitional housing projects to permanent supportive housing projects in an effort to retain funding from HUD's mandated reduction of Annual Renewal Demand. Despite this process, the HPAC's projections for future permanent supportive housing were low, and they displayed their reliance on Emergency Solutions Grant funding for rapid re-housing. Therefore, the HPAC could benefit through identifying alternatives sources of funding.

**Identify alternative funding for supportive services in existing projects.** To increase funding for permanent supportive housing projects, the United States Interagency Council on Homelessness (USICH) encourages CoCs to identify alternative funding sources for supportive services. First USICH suggests that CoCs conduct an evaluation of their projects to determine the value of any supportive services that projects spend on CoC funding. The assessment includes identifying the projects using supportive

services, assessing the value of those services to the project, and for those projects with valuable supportive services, ultimately partnering with or acquiring existing alternative sources for funding (USICH, n.d.-a). In FY 2013, the eight projects listed on the HPAC's final Grant Inventory Worksheet requested close to half of the CoC's Annual Renewal Demand in funding for supportive services (HPAC, n.d.-a). While the CoC's received 100% of the points in the Leveraging category, displaying their projects ability at leveraging resources, a reduction in CoC funds spent on supportive services could allow the HPAC to request funding for more permanent housing projects.

Specifically, USICH points to two potential sources of alternative funding: Medicaid and Health and Human Services. Both USICH and HUD call on CoCs to increase homeless enrollment in Medicaid due to the expansion of eligibility and services for the Medicaid program under the Affordable Care Act. This may allow some CoCs to transfer spending of CoC funding on supportive services to the Medicaid program (USICH, n.d.-f). Additionally, USICH encourages CoCs to examine opportunities to fund supportive services through federal government funding programs, specifically, the U.S. Department of Health and Human Services. Table 6.1 shows federal programs at Health and Human Services that may serve as funding alternatives for eligible supportive service costs in the CoC competition. There are up to 12 federal funding programs, including Medicaid, which CoCs could fund their supportive services through, thereby, relieving some funds for new permanent housing projects.

Table 6.1:

List of Eligible Services Cost in the CoC Program and Potential Program Funding Alternatives from the United States Department of Health and Human Services

CoC Eligible Services Category	TANF	FQHCs/HCHs	Head Start/ Early Head Start	SSBG	CSBG	PATH	Medicaid	MH Services Block Grant	Substance Abuse Prevention and Treatment Block Grant	Access to Recovery	CABHI	Childcare Development Fund
Case Management	X	X		X	X	X	X				X	
Life Skills Training	X	X		X	X	X	X				X	
Outreach Services		X		X	X	X						
Health Services		X					X					
Mental Health Services		X		X	X	X	X	X		X	X	
Substance Abuse Services		X		X	X	X	X		X	X	X	
Employment Assistance Services	X			X	X							
Early Childhood Development Services	X		X	X	X							X

Source: USICH (n.d.-b).

**Determine if transitional housing projects should be replaced with rapid re-housing or permanent supportive housing projects.** The HPAC had a large number of transitional housing projects in 2013. In fact, half of the projects listed in their Tier 1 were for transitional housing (HPAC, 2014b). HUD has indicated that they will be releasing instructions in the future regarding transitional housing and, due to their position on transitional housing in the FY 2013-FY 2014 NOFA, they likely will be encouraging CoCs to evaluate and replace this housing type with rapid re-housing. The HPAC should evaluate the performance, potential barriers to entry, and effectiveness of their transitional housing programs as HUD suggests in the NOFA and determine if the

funding from these projects should be used on permanent supportive housing or rapid re-housing projects.

### **CoC Application**

**Provide detailed descriptions in all application responses.** The HPAC could increase their score through providing further detail on some of their CoC Application responses. HUD expects detailed responses to their application questions, allowing up to 1,000 words for each response, and specifies that detail is necessary in order to receive full points (HUD, n.d.-b). Some specific areas where the HPAC could provide more detail is in their responses regarding their coordination with other funding sources, ways they are ensuring fair housing, their project application process, and even their plan for preventing homelessness. An example is seen in Figure 6.2 displaying the response of the Portland, Maine CoC in comparison to the response of the HPAC to a question on the CoC Application. The Portland, Maine CoC received a score of 135.55 in the FY 2013-FY 2014 CoC Program competition (HUD, n.d.-c). This placed the CoC in the top 58 out of 410 CoCs in the competition (HUD, 2014c), as shown in Figure 2 in Chapter 5.

In comparing only the amount of detail provided by both of the CoCs, not the number of procedures or services discussed, the Portland, Maine CoC still provided a greater amount of descriptive information that explained their procedures. It is possible that the lack of detail in the HPAC's responses was the result of a clear process not existing. It is also possible that the status of the Homeless Management Information System and Coordinated Entry system not fully functioning at the time of the application left the HPAC without more detailed information to include. If that is the case, the



implementation of new planning and procedures as well as those operating systems may assist in this regard.

*Table 6.2:*

**Application Response of the HPAC Compared to the Portland, Maine CoC**

<p><b>CoC Application Question 3C-10:</b> Describe the procedures used to market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to request housing or services in the absence of special outreach. (limit 1000 characters)</p>	
<p><b>HPAC Response:</b></p> <p>“There are several procedures used throughout the CoC, which include:</p> <p>Annual Fair Housing Training</p> <p>Hiring of bilingual, culturally competent staff (mainly Spanish but also Russian)</p> <p>Housing Resource Centers”</p>	<p><b>Portland CoC Response:</b></p> <p>“The CoC directly coordinates with the Consolidated Plan Analysis of Impediments and the biannual unsheltered point in time count to assess underserved population and to plan and implement outreach strategies through the local Fair Housing Action Plan. Specific activities include: coordinated service entry and referral through 211, which markets in multiple languages through social, print and online media, radio, and direct outreach to culturally-specific providers working with underserved communities; prioritizing subrecipient partnerships with culturally-specific providers; delivering multilingual mobile outreach and site-based services in places where underserved populations are found (e.g. deliver rental assistance for families through providers directly located in high-poverty schools). Through the CoC’s equity strategy, local funders monitor equitable access to services and outcomes and provide training and technical assistance to help providers improve.”</p>

Sources: Adapted from Portland Continuum of Care (2014) and HPAC (2014a).

**Benefits of an Improved Score**

With the implementation of some or all of these recommendations the HPAC’s score should increase however, this does not mean that funding will increase. In the HUD CoC Program, an increased score increases the likelihood that all projects will be funded before funding runs out. Therefore, an increased score does not necessarily mean an increase in funding but it does increase a CoC’s competitiveness and provide greater assurance that all of their projects receive funding. If projects do not receive funding, this

can decrease a CoC's Annual Renewal Demand, thus decreasing its funding for future competitions.

Although, a high score can assist a CoC in receiving bonus projects. Depending on HUD's rules in the NOFA for a particular competition year, bonus projects have the ability to be funded outside of the Final Pro Rata Need limitation. In this way, a higher score not only ensures that the Annual Renewal Demand is kept high but also that it is increased through the awarding of funds for bonus projects, that once renewed, will add to the Annual Renewal Demand. However, in FY 2014, the bonus project had its own separate scoring criteria, with a CoC's score determining whether they would receive funding for the bonus project in question (HUD, 2014e). It is possible that this is how HUD may fund bonus projects in the future, thereby leaving CoCs without a bonus project mechanism to increase their Annual Renewal Demand through the regular CoC Application score.

### **Conclusion**

The HPAC needs to increase their CoC Program competition score. By increasing their score, the HPAC will ensure that they retain funding for their projects and may increase funding through any bonus projects allowed in a CoC Program competition year. I identified deficiencies of the HPAC's application through a comparison of their application responses to HUD's grant scoring criteria in the FY 2013-FY 2014 competition. Based on knowledge of national best practices and HUD's future priorities, I expanded these application deficiencies into recommendations. These recommendations surround the categories of the Homeless Management Information System and

Coordinated Entry System, planning and procedures, permanent housing, and the CoC Application. Since the scoring round analyzed in this thesis occurred in FY 2013, it is possible that some of these improvements have already occurred within the HPAC. Even so, the implementation of all of these recommendations could greatly contribute to an increased score for the HPAC in an increasingly competitive competition. In this way, the HPAC and Yolo County may retain funding to assist in the achievement of their goal to prevent and end homelessness.

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