

Southern Nevada Regional Planning Coalition Committee on Homelessness (COH)
Unified Funding Agency (UFA) Assessment Tool: CoC Readiness Assessment Tool

COH can use the following tool to assess its ability to meet HUD’s published **minimum** Continuum of Care (CoC)-related Unified Funding Agency requirements for CoC Program grants and scoring criteria. This tool is intended to facilitate COH’s discussion about whether the CoC should move towards a UFA structure for managing its CoC Program grants, and should be used prior to the UFA application process.

Note that meeting the below requirements does not ensure that the CoC’s designated representative, the Collaborative Applicant, will be selected or qualify as a UFA—additional requirements apply to the Collaborative Applicant and HUD has selected only a few Collaborative Applicants for UFA designation.

| | | YES | | NO | |
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| | | ✓ | Describe how CoC meets requirement | List CoC documents demonstrating compliance | ✓ |
| | The CoC meets <u>all</u> of the following process-related requirements: | | | | |
| CoC STRUCTURE | <ul style="list-style-type: none"> • Holds meetings of the full CoC membership? <ul style="list-style-type: none"> ○ With published meeting agendas? ○ At least semi-annually? • Has the CoC retained documentation (e.g., dated meeting agendas) of its full CoC member meetings? | | | | |
| | <ul style="list-style-type: none"> • Has an open invitation process (e.g., publicly invites) for new members to join? <ul style="list-style-type: none"> ○ At least annually? | | | | |
| | <ul style="list-style-type: none"> • Has a written process to select a Board of Directors to | | | | |

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| | <p>act on behalf of the CoC?¹</p> <ul style="list-style-type: none"> • Follows the process? • Does the following to this process at least once every 5 years: <ul style="list-style-type: none"> ○ Reviews? ○ Updates? ○ Approves? | | | | |
| | <ul style="list-style-type: none"> • Appoints additional committees, subcommittees or workgroups? • Are they active in the CoC? • | | | | |

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¹ See the content-related requirements in the CoC BOARD SELECTION section.

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| GOVERNANCE CHARTER | <ul style="list-style-type: none"> • Has a CoC governance charter?² <ul style="list-style-type: none"> ○ Was it developed in consultation with both the following: <ul style="list-style-type: none"> ▪ Collaborative Applicant? ▪ HMIS lead? ○ Do all parties involved follow the governance charter? ○ Does the governance charter show this? ○ Is the governance charter updated at least annually? | | | | |
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² See the content-related requirements in the GOVERNANCE CHARTER section below.

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| PROJECT PERFORMANCE | <ul style="list-style-type: none"> • Has established performance <u>measures/targets</u>? <ul style="list-style-type: none"> ○ Do they apply to CoC-funded projects? ○ Were they developed in consultation with both of these: <ul style="list-style-type: none"> ▪ Recipients? ▪ Subrecipients? ○ Do the targets consider or are otherwise appropriate for these: <ul style="list-style-type: none"> ▪ Population type? ▪ Program type? ○ Does the following inform the CoC developing appropriate targets: <ul style="list-style-type: none"> ▪ Gathering info from recipients and subrecipients ▪ Using this info | | | | |
| | <ul style="list-style-type: none"> • Take action against poor performers? • Ensure poor performing projects are mentored to improve performance? | | | | |
| | <ul style="list-style-type: none"> • Evaluate outcomes of the following: <ul style="list-style-type: none"> ○ ESG Program-funded projects? | | | | |

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| | <ul style="list-style-type: none"> ○ CoC Program-funded projects? ● Report results to HUD? ● Are the evaluation methods specific? <ul style="list-style-type: none"> ○ Do the evaluation methods include assessing whether outcomes are sufficient to address the reduction of homeless in the CoC's geographic area for both of these: <ul style="list-style-type: none"> ▪ ESG projects ▪ CoC projects | | | | |
| <p style="text-align: center;">WRITTEN STANDARDS FOR CoC ASSISTANCE</p> | <ul style="list-style-type: none"> ● Created written standards for CoC assistance (i.e., included in ESG-CoC Written Performance Standards³)?⁴ ● Consulted with ESG recipients to create them? ● Consistently follows them? | | | | |

³ 2013 CoC Registration §III.D.5.b.(3) refers to them with this name and says these need to include the written standards in 24 CFR 578.(a)(9)(i-vi)

⁴ See content-related requirements in the WRITTEN STANDARDS FOR CoC ASSISTANCE section below.

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| CENTRALIZED/COORDINATED ASSESSMENT SYSTEM | <ul style="list-style-type: none"> • Has a centralized or coordinated assessment system? • Has the system been successfully implemented? • Consulted with ESG recipients in developing it? • Does the system cover the CoC’s geographic area? • Does the CoC use a centralized/coordinated assessment system protocol within the geographic area?⁵ | | | | | |
| COORDINATION | <ul style="list-style-type: none"> • Conducts a point-in-time (PIT) count with at least the following frequency for each PIT count type: <ul style="list-style-type: none"> ○ Sheltered: annually? ○ Unsheltered: biennially? • PIT counts meet HUD requirements? | | | | | |
| | <ul style="list-style-type: none"> • Conducts a gaps analysis addressing the following: <ul style="list-style-type: none"> ○ Needs? ○ Services? ○ Analysis frequency: at least annually? | | | | | |
| | <ul style="list-style-type: none"> • Developed a CoC Housing and Services System/Coordination Plan that meets the following: | | | | | |

⁵ See content-related requirements in the CENTRALIZED/COORDINATED ASSESSMENT SYSTEM PROTOCOL section below.

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| | <ul style="list-style-type: none"> ○ Coordinates efforts to implement a housing and service system that meets the needs of homeless individuals (including unaccompanied youth) and families? ○ Clearly outlines these: <ul style="list-style-type: none"> ▪ Outreach, engagement, and assessment methods ▪ Shelter, housing, and supportive services ▪ Prevention strategies | | | | | |
| | <ul style="list-style-type: none"> • Actively participates in the following for the Consolidated Plan: <ul style="list-style-type: none"> ○ Development? ○ Updates? ○ For all relevant jurisdictions? | | | | | |

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| <p style="text-align: center;">ESG COORDINATION</p> | <ul style="list-style-type: none"> • Coordinate with ESG recipients on the following: <ul style="list-style-type: none"> ○ Allocation? ○ Reporting? <ul style="list-style-type: none"> ▪ Has a plan been developed for joint reporting guidelines for ESG recipients and subrecipients? ▪ Have both CoC and ESG recipients approved the plan? ○ Evaluating performance of both: <ul style="list-style-type: none"> ▪ ESG recipients? ▪ ESG subrecipients? ○ Centralized/coordinated assessment system | | | | |
| <p style="text-align: center;">HMIS STRUCTURE</p> | <ul style="list-style-type: none"> • Have a single HMIS designated for the CoC? | | | | |
| | <ul style="list-style-type: none"> • Have a designated HMIS Lead? • Have a clear process describing how the HMIS Lead ensures consistent participation in the system including by at least both: <ul style="list-style-type: none"> ○ Recipients? ○ Subrecipients? | | | | |

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| | <ul style="list-style-type: none"> Does the process describe how aggregate data from DV service providers is handled? | | | | |
| | <ul style="list-style-type: none"> Has the following HMIS-related documents: <ul style="list-style-type: none"> Privacy plan Security plan Data quality plan Have a clear process describing how the CoC (or designated representative) ensures the HMIS is administered in compliance with all applicable HMIS Data Standards? | | | | |
| | The CoC has written policies and procedures including <u>all</u> of the following content: | | | | |
| COC BOARD SELECTION | <ul style="list-style-type: none"> Does the CoC Board selection criteria include the CoC Program Interim Rule requirements in §578.5(b)(1)-(2): <ul style="list-style-type: none"> Representative of the relevant organizations and of projects serving homeless subpopulations Include at least one homeless or formerly homeless individual | | | | |
| GOVERNANCE CHARTER | <ul style="list-style-type: none"> Does the governance charter include all the policies and procedures needed to comply with the following: | | | | |

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| | <ul style="list-style-type: none"> ○ CoC Program Interim Rule §578.5-§578.13 ○ All applicable HMIS Data Standards ○ Code of Conduct, including conflict of interest requirements, and recusal process covering at least all the following people: <ul style="list-style-type: none"> ▪ CoC Board ▪ CoC Board chair(s) ▪ Any person acting on behalf of the CoC Board | | | | | |
| WRITTEN STANDARDS FOR CoC ASSISTANCE | <ul style="list-style-type: none"> ● Evaluating individuals’ and families’ eligibility for CoC Program assistance? | | | | | |
| | <ul style="list-style-type: none"> ● Determining and prioritizing which eligible individuals and families will receive any of these: <ul style="list-style-type: none"> ○ Transitional housing? ○ Rapid re-housing assistance? ○ Permanent supportive housing? | | | | | |
| | <ul style="list-style-type: none"> ● Standards determining the rental percentage or amount of rent each program participant must pay while receiving rapid re-housing assistance? | | | | | |

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| <p style="text-align: center;">CENTRALIZED/COORDINATED ASSESSMENT SYSTEM PROTOCOL</p> | <ul style="list-style-type: none"> • Does the CoC’s centralized/coordinated assessment system protocol include the following: <ul style="list-style-type: none"> ○ Assisting the homeless in obtaining necessary referrals for housing and services ○ Clear policies on how the system addresses the specific needs of persons fleeing or attempting to flee domestic violence (DV)? <ul style="list-style-type: none"> ▪ Do the DV policies contemplate these persons seeking services from non-DV service providers? | | | | |
| <p style="text-align: center;">MONITORING SUBRECIPIENTS</p> | <ul style="list-style-type: none"> • Comprehensive written policies and procedures for monitoring subrecipients (Monitoring Guide for Subrecipients) includes the following: <ul style="list-style-type: none"> ○ Monitoring frequency ○ Sample letters used to notify the subrecipient of concerns and/or findings ○ How these can be resolved ○ Ramifications of failing a monitoring visit and/or refusing to abide by corrective actions ○ Any other CoC-approved requirements | | | | |

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| OTHER SUBRECIPIENT- RELATED | <ul style="list-style-type: none"> Managing non-compliant subrecipients?⁶ | | | | | |
| | <ul style="list-style-type: none"> Managing high-risk subgrantees?⁶ | | | | | |
| | <ul style="list-style-type: none"> Addressing subrecipient conflict of interest⁶ | | | | | |
| GRANT AMENDM ENTS | <ul style="list-style-type: none"> Processing requests for grant amendments? Is process prior to submission to HUD? | | | | | |
| | The CoC has documentation showing the following: | | | | | |
| | <ul style="list-style-type: none"> Listing all of the active committees, subcommittees, or work groups? | | | | | |
| | <p>If a CoC committee/subcommittee/workgroup developed any of the above documents, then the CoC has these:</p> <ul style="list-style-type: none"> Listing of those involved in the development by member name and organization type (e.g., DV, transitional housing, local government)? Date CoC membership last reviewed the documents? Date CoC membership last approved the documents? | | | | | |

⁶ The CoC likely has a role in developing and overseeing related policies and procedures. However, the CoC’s role may relate more to ultimate oversight and issues like ensuring an overall fair process, while the UFA agency’s role may involve issues like direct interactions with subrecipients. As a result, both the CoC and UFA agency may have created policies and procedures on this, but they should be complementary and consistent with each other. Alternatively, the CoC and UFA agency could develop one set of procedures clearly detailing the roles of all relevant parties.

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