

Recommendations for CoC Improvements

Southern Nevada Homelessness Continuum of Care

Introduction and Background

The current United States Department of Housing and Urban Development (HUD) technical assistance (TA) team has been working with the Southern Nevada Homelessness Continuum of Care (SNH CoC) since the spring of 2020. The initial focus of the TA team's work was to support the CoC in preventing, preparing for, and responding to the COVID-19 global pandemic, which included rapidly decompressing congregate shelter, supporting medically fragile individuals in transitioning from unsheltered homelessness to non-congregate shelter, and rapidly rehousing individuals from non-congregate shelter.

The TA team completed a [system modeling report](#), drawing from prior TA work in facilitated community meetings, to estimate the need and cost for various housing interventions over a five-year span. In light of the onset of COVID-19, TA included a real-time model within the final report to estimate more current housing needs and how the community could best utilize Coronavirus Aid, Relief, and Economic Security (CARES) Act funding to develop commensurate housing interventions. Consistent with some of the recommendations in this report, local jurisdictions set aside a portion of CARES Act Emergency Solutions Grants (ESG-CV) funding to develop a rapid rehousing (RRH) program as part of the Operation HOME! (OH!) initiative. As OH! planning started, the TA team helped to support OH! implementation teams, stand up centralized landlord engagement, and support the OH! initiative's RRH providers.

While the OH! initiative has had some success, there are still areas needing attention that align with recommendations in the system modeling report. Some examples would be extending OH! lessons learned to become system-wide practices, implementing housing problem-solving (i.e., diversion and rapid exit), and increasing the amount of affordable, permanent housing units to respond to client needs.

Throughout this work, the TA team sought to understand the disparities that exist in the homeless response system by analyzing quantitative data sources including Point-in-Time (PIT) count data, Housing Inventory Count data, Annual Performance Reports, Stella P, and de-identified client-level data. The TA team built and supported further development of a [dashboard](#) to monitor progress toward the goal of housing 2,022 households by the end of 2022. In 2023, the CoC Board opted for the TA team to further support the CoC focus on equity through monthly discussions during CoC Board meetings. These are ongoing through 2023.

The four members of the TA team offering these recommendations represent a collective 60+ years of professional experience. This includes working as a HUD employee, Collaborative Applicant (CA), Homeless Management Information System (HMIS) lead, and coordinated entry (CE) lead, as well as providing direct service, conducting program monitoring and evaluation, facilitating strategic planning, and consulting extensively across a wide variety of communities throughout the United States.

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CoC Review & Recommendations

In January 2023, the CoC Board approved a recommendation from the Ad Hoc Governance Committee for HUD TA to conduct a review of the CoC to help it move toward more person-centered practices. This document further details recommendations from the TA team based on five review components (numbered for reference, not in any order of priority):

1. [CoC Board Purpose and Structure](#)
2. [CoC Working Group and Committee Structure](#)
3. [Collaborative Applicant Roles and Responsibilities](#)
4. [Data, HMIS Governance and HMIS Lead Roles & Responsibilities](#)
5. [Coordinated Entry \(review and recommendations developed in partnership with the Southern Nevada Lived X Consultants\)](#)

Guiding Principles

The HUD TA team adopted the following guiding principles to conduct this review. Evidence of these is present throughout the recommendations:

- Person-centered systems and practices
- Equity
- Housing focus
- Transparency in community
- Inclusivity and diversity of perspective
- Data-informed
- Action-oriented

Equity

CoC governance, at its core, means establishing clear roles, responsibilities, and decision-making structures to ensure that the system infrastructure supports the priorities of the community and benefits people accessing the homeless response system. While some of the individual components of this review (e.g., HMIS governance) may not initially seem to have anything to do with equity, the TA team's experience in working with communities to address all governance issues has discovered that governance-related issues are often *all* about equity.

In the past few years, communities have worked to understand the homeless response system through an equity perspective, which includes questioning who makes decisions in the community and who holds power. Communities should interrogate their governance structures to ensure that the structures themselves are not creating inequities.

Data Collection Methods

Data to inform the recommendations throughout this report were collected through three different surveys collectively totaling 139 responses; one or more individual interviews with all CA and HMIS lead staff; one or more interviews with the leadership and administrative support of

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each existing working group and committee; focus groups; board, working group, and committee meeting participant observation; document analysis; and quantitative data analysis.

Overarching Themes and Current Opportunities

Throughout data collection and analysis, the following themes emerged consistently. These themes represent both strengths and opportunities for improvement and each one can be traced to the detailed recommendations within each review component that follows.

1. The people who continuously contribute to the SNH CoC are committed to working together to address homelessness but are severely hindered by the lack of a clear, consistent vision and an actionable leadership structure that can challenge community norms, facilitate cultural change, and implement a comprehensive strategy to end homelessness.
2. The current CoC structure was a successful way to implement sweeping changes to the CoC required by the 2009 federal Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act. This structure now presents an opportunity to evolve in ways that bring more person-centered and equitable practices to the forefront of local homelessness and housing response.
3. Local jurisdictional commitment to supporting CoC capacity is a major strength. However, the CoC needs to be intentional about balancing this support with the need for strategies that are community-driven and practices and policies that are centered around people experiencing homelessness and those who work most closely with them.

The opportunities presented in these themes and throughout this document are less about regulatory compliance and more about revising systems to improve outcomes for complex, whole humans. Genuine implementation will require a willingness to deconstruct the dominant culture, engage in difficult conversations, hold mutual accountability, and lean into leadership opportunities over the long term.

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Component 1: CoC Board Purpose and Structure

Introduction

The HUD TA team has performed a thorough review of the CoC’s governance charter and surveyed the CoC board with questions on the board’s purpose and function, use of data, meeting efficacy, engagement of diverse perspectives, and suggestions or recommendations for changes. The TA Team also engaged with board leadership and other critical partners, such as the CA and HMIS lead to discuss the role of the board within the Southern Nevada CoC.

The CoC board is generally a group of individuals elected by CoC members that provides oversight and governance on behalf of the CoC. The board’s responsibilities are defined by the CoC in a governance charter. The board should be comprised of a diverse group of organizations and projects serving homeless populations and subpopulations within the CoC’s geographic area. HUD requires at least one person with lived experience to serve on the board, although more than one person is preferable to avoid tokenization.

Recommendations

The current board for the Southern Nevada Homelessness CoC is large with little oversight of CoC activities. The recommendations below seek to empower the CoC board to effectively govern the CoC while re-centering the community it represents.

Recommendation	Justification	Entities Involved
<p>Board Structure 1.1 Empower the CoC board to effectively govern the CoC.</p> <ul style="list-style-type: none"> - Per board conversations, the TA team suggests identifying someone who can provide staffing, support strategic planning, and act on the board’s behalf as a means of adding capacity. - Engage in direct dialogue about the purpose of the board and the vision and mission of the CoC and develop a board strategy to clarify next steps and board priorities. 	<p>The current CoC board does not steer or manage the CoC and does not have the capacity to do so. The board needs a neutral party to assist with project management and holding parties accountable. The CoC needs to develop a clear and consistent vision in order to move the CoC forward.</p>	<ul style="list-style-type: none"> • CoC board • Executive committee

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<p>1.2 Create an executive committee of the board to drive board strategy and ensure that every agenda and meeting results in action related to the mission of making homelessness rare, brief, and non-recurring.</p> <ul style="list-style-type: none"> - Suggestion: the CoC steering committee or ad hoc governance working group (plus board leadership) could quickly transition to become an interim executive committee. 	<p>The current steering committee was initially created for this purpose but has become an entity that only creates the agenda for the monthly board meetings. Respondents to the board survey shared that meetings needed to be more focused and action-oriented.</p>	<ul style="list-style-type: none"> • CoC board
<p>1.3 Increase board leadership terms to two years and/or consider adding a past chair position to the executive committee (see Appendix A).</p>	<p>It generally takes a year for someone new to board leadership to learn the position and the annual HUD calendar. Adding a second year or a past chair position would ensure that leadership can lead with experience.</p>	<ul style="list-style-type: none"> • CoC board
<p>1.4 Consider decreasing the total number of board members.</p>	<p>The current board is too large for effective decision-making and there is not enough representation from people with lived experience and service providers.</p>	<ul style="list-style-type: none"> • CoC board • Opportunity for the full CoC and relevant committees to give input
<p>1.5 Evaluate the demographic makeup of the board compared to that of the population experiencing homelessness in Southern Nevada and find ways to reach out to underrepresented and marginalized populations to ensure they have representation.</p>	<p>Representation matters. The board should reflect a diversity of thought and experience, with a particular focus on centering the voices of people with lived expertise and representing those populations that are overrepresented in the homeless services system.</p>	<ul style="list-style-type: none"> • CoC board
<p>1.6 Revise the CoC governance charter to include updates to board make-up and processes, including specificity around what decisions are made by the board, which require input from the full membership, and</p>	<p>The results of the board survey showed that board members were uncertain of what actions necessitated approval by the board and which actions needed broader approval. Many responsibilities fall to the board that would be more appropriately assigned to a compensated entity for day-to-day oversight.</p>	<ul style="list-style-type: none"> • CoC board • Executive committee

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<p>how the board will communicate with the membership to receive that input.</p>		
<p>1.7 Revise the governance charter to state that full CoC membership votes to elect board members.</p>	<p>The board would ideally be comprised of individuals that are elected by all CoC members.</p>	<ul style="list-style-type: none"> • CoC board • Executive committee
<p>Board Meetings</p>		<ul style="list-style-type: none"> •
<p>1.8 Bring relevant information and updates to public, community forums for feedback rather than expecting community members to step away from their jobs to attend various board and working group meetings to stay abreast of CoC activities and important decision points.</p>	<p>The board answers to and should represent the full CoC membership. Members should not be expected to step away from their jobs to attend board meetings and working groups for community updates. Ideally, the community would help decide the most effective means of ongoing communication. Convenings should be a place for two-way dialogue and community input. Meeting frequency can be balanced through other forms of ongoing communication such as membership emails or a CoC newsletter. Federal regulation requires CoC membership to meet a minimum of two times per year. The governance charter only identifies one meeting per year.</p>	<ul style="list-style-type: none"> • CoC board • CA • Opportunity for the full CoC and relevant committees to give input
<p>1.9 Remove strict compliance with open meeting law and instead create a process that increases transparency, information accessibility, community input, and the ability to pivot to immediate action when needed.</p>	<p>Compliance with open meeting law has only been applied to CoC board meetings and is not present across other CoC working groups. In the CoC board meeting, the requirement has contributed to a level of formality and inaccessibility for the full CoC membership. It is recommended that the board apply the principles of accessibility and transparency across CoC core function committees and the CoC board, allowing the CoC to adopt certain parts of open meeting law that are beneficial and drop those that make it difficult to be flexible and act on decision points as necessary. The types of decisions that can be made without broader community support need to be clearly outlined.</p>	<ul style="list-style-type: none"> • CoC board

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<p>1.10 Re-orient board meetings to make them more action-oriented. The CoC chair should assign a point person for each task, ask for updates, and set a completion date for the work.</p>	<p>Respondents to the board survey shared that meetings needed to be more focused and action-oriented. Assigning someone from board leadership to keep on top of to-do items and discussions ensures that someone is keeping track of open items.</p>	<ul style="list-style-type: none"> • CoC board • Executive committee
<p>1.11 Develop ongoing board training to ensure that board members have knowledge of the roles and responsibilities of all of the entities in the CoC and the tools and data available to make decisions.</p>	<p>Board survey results showed that half of the responding board members did not feel they had the training, data, information, and/or tools to make CoC decisions.</p>	<ul style="list-style-type: none"> • CoC board • Executive committee
<p>1.12 Incorporate regular reviews of CoC data coupled with training on how to review specific data sets and what additional data can be made available for further analysis (consider both quantitative and qualitative sources).</p>	<p>To be a data-driven system, the board should regularly review available data sets to inform decision-making and ensure CoC actions are leading to improved outcomes. Review of any HUD-required reports should take place at least one month prior to submission.</p>	<ul style="list-style-type: none"> • CoC board • Executive committee • HMIS steering committee
<p>1.13 Work with local jurisdictions, the Nevada Housing Coalition, and other relevant partners to review data on available and affordable housing in Southern Nevada and create a housing development pipeline to address the unmet need.</p>	<p>Nevada is among the eight states with the least available affordable housing for lowest-income renters. Research from the National Low Income Housing Coalition shows that Nevada has roughly 18 affordable units for every 100 people who earn 30 percent or less of the area median income. To be successful, the board needs to shift the homeless service response system to a housing-focused system.</p>	<ul style="list-style-type: none"> • CoC board • Executive committee

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Component 2: CoC Working Group and Committee Structure

Introduction

The HUD TA team has performed a thorough review of the CoC’s governance charter, attended all working group meetings, and reviewed documents created or related to working groups. The TA team surveyed members of the working groups and interviewed and solicited suggestions from the champions of each working group.

Committees and working groups can have a large influence on the day-to-day functions of programs and the CoC. Useful committees are attended by staff that are working directly with clients (depending on the committee’s function, of course) and people with lived experience as they often have the best information on issues and challenges and what solutions may or may not work. With all of the knowledge and experience of the individuals in the committees, recommendations on programs and policies should be elevated to the board for potential changes to governing documents. Southern Nevada has a large number of working groups and participants often complain that they are in too many meetings that are also too lengthy. Most of the working groups were either unclear on their primary purpose or were investing in activities that produced outputs but did not directly result in meaningful community outcomes.

Recommendations

The following recommendations seek to decrease the number of committees in the CoC, which will hopefully free up more time for participating CoC members to perform their day jobs and shift the groups from compliance to efficacy, action, and quality. Recommended committees are focused on core CoC functions with the option to add time-limited, ad hoc groups or new standing committees as needed.

Recommendation	Justification	Entities Involved
<p>2.1 Reduce the number of working groups to three essential CoC core functions and two lived-experience teams. Assign funded entities to support each group and task those groups to report relevant updates to the Board and CoC membership in real time (see Appendix B and Appendix C)</p>	<p>Reducing the number of working groups will allow for more time for work to get done between meetings. It would also consolidate energy investment and administrative support needs. Every committee’s makeup needs to include a majority of people with lived expertise, representatives of marginalized communities and service providers. If at any point the committee make up shifts away from this, it should be revisited through targeted outreach to new members.</p>	<ul style="list-style-type: none"> • CoC board • CoC executive committee • Input for CoC membership adoption of governance charter

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<p>-2.1.1 Create a Southern Nevada HMIS steering committee to work on HMIS governance, oversight, and evaluation for the Southern Nevada CoC and to coordinate needs with the statewide CoC steering committee.</p>	<p>The Southern Nevada CoC needs a focused group to discuss HMIS policies and issues and to evaluate HMIS activities and staff.</p>	<ul style="list-style-type: none"> • CoC board • HMIS lead
<p>-2.1.2 Create a CoC programs committee to oversee the CoC projects. The group would identify training needs, set performance targets, and work on equity.</p>	<p>These functions are currently nonexistent in the CoC or disbursed among multiple working groups. Grouping the needs and expectations of CoC projects into one committee would streamline overlapping responsibilities among current working groups and allow for more focused support for CoC agencies.</p>	<ul style="list-style-type: none"> • CoC board • CA
<p>-2.1.3 Revise the CE working group to become the coordinated services committee. The committee would support person-centered service delivery and coordination in a way that meets compliance with CE requirements.</p>	<p>The coordinated services committee would generally retain all responsibilities of the CE systems working group, though these responsibilities should be clearly defined in the governance charter and supported by either the CA or the new CE lead entity as the resourced, responsible party. The change in name from “coordinated entry” to “coordinated services” indicates a shifted expectation to more broadly support the service provider community across the entire continuum of services that a household may need (inclusive of, but not limited to, the core components of CE). Committee membership, procedures that outline efforts for greater transparency, committee and CE lead authority, decision-making, and communication expectations need to be detailed and approved with input from the broader homelessness and housing services community and people with lived experience of homelessness.</p>	<ul style="list-style-type: none"> • CoC board • CA until a CE lead is identified • Input from the broader community • Lived X Consultants • Youth action board
<p>-2.1.4 Prioritize support and engagement of lived expertise committees.</p>	<p>Maintain the Lived X and youth lived experience committees and increase board representation from these groups to two members each. It is critical that the</p>	<ul style="list-style-type: none"> • Lived X Consultants • Youth action board

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	board include more voices of people with lived expertise who can speak to the local realities of the system.	
-2.1.5 Dissolve the data and systems improvement working group.	Work would be moved to the CoC board, the CoC programs committee, and the HMIS steering committee.	• See 2.1
-2.1.6 Dissolve the monitoring working group.	Oversight for monitoring and ESG coordination would be moved to the CoC program committee. A higher level of ESG-specific coordination could take place outside of the committee.	• See 2.1
-2.1.7 Dissolve the evaluation working group.	Work would be moved to the CoC program committee and specific rank and review activities would be carried out by a time-limited rank and review working group under that committee.	• See 2.1
-2.1.8 Dissolve the planning working group.	Gaps analysis and equity focus could be supported by all three core function committees and ultimately reside with the CoC board to ensure leadership and strategy are tied to gaps analysis and equitable outcomes.	• See 2.1
-2.1.9 Dissolve the community engagement working group.	The CoC board and executive committee can identify needs for community coordination beyond assigned CA tasks (e.g., PIT publication). If needed, groups can gather staff on an ad-hoc basis. CoC policies should reference who can speak publicly on behalf of the CoC and under what conditions.	• See 2.1
2.2 Reduce sub-working groups and assign key functions to the CoC board and new committees.	Sub-working groups tend to diffuse responsibility from the primary working groups and create an even greater number of bodies to coordinate without commensurate administrative support. Ad hoc working-groups can be created on an as needed basis, for specific, time-limited tasks.	• CoC board • CoC executive committee
-2.2.1 Dissolve the trust fund ad hoc working group.	This working group was time-limited and work is complete. Any additional work to determine the expansion or use of a trust fund can be brought to the board directly.	• See 2.1

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<p>-2.2.2 Dissolve the landlord engagement working group in its present form.</p>	<p>Clark County’s Landlord Engagement and Property Services team is funded to conduct this work on behalf of the community. They, along with the landlord engagement specialist, can communicate information to the rest of the CoC directly or convene advisory groups with key partners on an as-needed basis.</p>	<ul style="list-style-type: none"> • See 2.1
<p>-2.2.3 Dissolve the governance ad hoc working group as a standing group, let the CoC board take more direct responsibility for CoC governance, and let the CoC board call for ad hoc committees to support governance changes on an as-needed basis.</p>	<p>At the direction of the executive committee and CoC board, the CA can update governance documents. If the board is to effectively govern, it must take responsibility for regular updates, community feedback, and adjustments to CoC governance.</p>	<ul style="list-style-type: none"> • See 2.1
<p>-2.2.4 Keep the time-limited PIT working group.</p>	<p>The working group should continue as-is under the CoC programs committee with an increased emphasis on inclusive coordination and communication.</p>	<ul style="list-style-type: none"> • See 2.1
<p>-2.2.5 Create a rank and review working group, under the CoC programs committee, to include non-conflicted CoC members who are selected and approved by the CoC board and supported by the CA and/or contractor.</p>	<p>This annually convened working group can focus on the singular task of reviewing CoC notice of funding opportunity (NOFO) project applications and scoring them with a recommendation of the priority listing to the CoC board.</p>	<ul style="list-style-type: none"> • CoC board • CoC executive committee
<p>2.3 Revisit other community groups, considering efficacy, need, and capacity.</p>		<ul style="list-style-type: none"> • CoC board • CoC executive committee
<p>-2.3.1 Dissolve OH! leadership.</p>	<p>OH! leadership tasks pertaining to system-wide goals should fall under the purview of the CoC board and core function working groups.</p>	<ul style="list-style-type: none"> • See 2.1
<p>-2.3.2 Dissolve the emergency shelter leadership council.</p>	<p>This council was created as a result of a specific community initiative. Participation has waned over time and meetings are often canceled due to lack of content. Provider coordination functions can be facilitated</p>	<ul style="list-style-type: none"> • CoC board • CoC executive committee

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	through the coordinated services committee and any further need for shelter-specific work can be re-initiated as needed.	
-2.3.3 Place the housing problem-solving (HPS) leadership and learning collaborative groups under the coordinated services committee with support from the CE lead entity.	The CE lead entity could ensure HPS implementation is consistent with CE access points and person-centered practices. Determine if the leadership group can eventually be absorbed by the coordinated services committee.	<ul style="list-style-type: none"> • CE lead entity • Coordinated services committee • Funding jurisdictions
- 2.3.4 Revamp the coordinated outreach meetings to generate participation from all outreach teams and use the meetings for case conferencing and other unsheltered coordination as needed	The CE task force identified people living outdoors as a specific sub-population for CE case conferencing. The coordinated outreach coordinating entity recommended these meetings be repurposed to include case conferencing.	<ul style="list-style-type: none"> • CoC board • CA, until CE lead is established
-2.3.5 Retain community implementation groups that meet specific community needs and coordinate services for specific subpopulations (e.g., rapid rehousing learning collaboratives, youth working group, veterans, etc.).	Each of these groups should have the ability to bring concerns directly to CoC board, committee, and membership meetings for rapid communication and action.	<ul style="list-style-type: none"> • CoC board • CoC executive committee • Relevant groups and committees
2.4 Conduct a review of CoC activities and responsible parties. Revise the governance charter to state which specific entity or individual position is responsible for completing each HUD requirement .	The governance charter currently lists the responsible entities for many HUD requirements as the working groups. Most attendees to working groups are not compensated for CoC work and it is an additional duty on top of their day jobs. Ensuring that tasks are taken on by CA staff, local jurisdictions, or specific local partners allows for a point person that is paid for CoC work to be responsible for the activity instead of an entire working group.	<ul style="list-style-type: none"> • CoC board • CoC executive committee • CA • HMIS lead • Input for CoC membership adoption of governance charter

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Component 3: Collaborative Applicant Roles and Responsibilities

Introduction

The HUD TA team has performed a thorough review of the CoC’s governance charter and held conversations with CA staff about the roles and activities they perform for the CoC. The TA team also engaged a team of volunteer board members to learn more about the role of a Collaborative Applicant and discuss the role specific to the SNH CoC.

The CA generally plays a big role in most CoCs across the country, often taking on many more responsibilities than solely leading the effort to consolidate and write the NOFO application for the community. As one of the only entities in a CoC that can access flexible planning dollars to administer the CoC, the CA also works to develop system-level responses and coordinate local community priorities to strategically make homelessness rare, brief, and non-recurring. The following recommendations will strengthen the governance structure, provide written documentation of clear roles and responsibilities for the CA, and put in place an evaluation and monitoring process to make changes that benefit the households the CoC serves.

Recommendations

The SNH CoC is a large community with agencies and partners working hard to address and end homelessness every day. It is important to note that the CA currently meets all HUD CoC requirements and deadlines and significantly invests in the role beyond what the CoC planning dollars allow. The following recommendations would make these activities more transparent to and inclusive of community members, strengthen the governance structure, and provide for much clearer roles and responsibilities within the homeless response system.

Recommendation	Justification	Entities Involved
3.1 Create a CA memorandum of understanding (MOU) with the CoC that clearly details roles, responsibilities, priorities, and decision-making structures.	There is currently no MOU to govern the CA. Absent a clear understanding of what decisions get made where and by whom, the default is that whoever is closest to the issue makes the decision. Clear lines of authority are critical to ensure a shared understanding of each entity’s roles and how decisions are made.	<ul style="list-style-type: none">• CoC board• CA• Participating agencies• Opportunity for the full CoC and relevant committees to give input

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<p>3.2 Update the Southern Nevada Homelessness CoC governance charter to include a process for issuing a request for proposal (RFP) for the CA role and to reflect agreed-upon CA roles and responsibilities.</p>	<p>The governance charter does not currently match the roles and responsibilities that the CA performs for the CoC. The process to update the charter can be used as a platform to ensure everyone has a consistent understanding of primary roles. A comprehensive review should occur annually. The process for revision should be documented in the charter. Issuing an RFP for the CA role every few years allows for the CoC to evaluate the current entity serving in that role against other interested parties.</p>	<ul style="list-style-type: none"> • CoC board • CA • Opportunity for the full CoC and relevant committees to give input
<p>3.3 Clearly delineate assigned staff, entity roles, and responsibilities of the CA/CoC lead with those of the HMIS lead</p>	<p>Clark County Social Services serves in both the CA/CoC lead and HMIS lead roles and it is important to distinguish between the responsibilities they have in the two different and very important roles. Governance should be able to distinguish these roles as clearly as if they were held by two completely different agencies within the community. It also should be possible for the community to identify different entities to serve in the roles of CA/CoC lead and HMIS lead in such a way that the two roles are not automatically assumed to have to be filled by the same agency (unless that is what the community determines is the best path forward).</p> <p>The SNH CoC is too large for one person to be both the CoC lead and the HMIS lead for three CoCs in the state. In order to be able to do both important and time-consuming jobs well, there needs to be a full-time CoC lead and a separate person who serves as the HMIS lead.</p>	<ul style="list-style-type: none"> • CoC board • CA • HMIS lead • Relevant committees of the CoCs
<p>3.4 Clearly delineate within Clark County Social Services between the responsibilities and functions of Clark County Social Services and those of the CA and HMIS lead.</p>	<p>Because Clark County Social Services serves as the CA and CoC lead and uses non-CA staff to assist with CoC needs, the lines between entities in Clark County are often blurry. The commitment to CoC success is</p>	<ul style="list-style-type: none"> • CoC board • CA • Clark County Social Services

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	<p>commendable and ideally the same level of additional support would continue and be matched by other local entities. However, for clarity of oversight and communication chains, it is important to distinguish between these functions. Written documentation should be able to distinguish these roles as clearly as if they were held by two completely different agencies within the community.</p>	
<p>3.5 Formalize the CA sharing the following with the CoC board annually and as requested:</p> <ol style="list-style-type: none"> 1) The planning grant application and budget for board input and approval prior to NOFO submission. 2) The Planning Grant Annual Performance Report at least one month prior to submission to HUD. 3) An annual accounting of current planning grant activities to share with the board. 	<p>As one of the only entities within the CoC that is funded to do CoC work, it is important that there is coordination, input, and awareness about how planning grant funds are spent and what the CA submits to HUD in the annual NOFO competition and through annual reporting. Ideally, an annual calendar laid out in the MOU or in advance of the calendar year would specify when the board could expect these things.</p>	<ul style="list-style-type: none"> • CoC board • CA
<p>3.6 Incorporate a CA monitoring and evaluation process into governance that identifies how often the process occurs, what tools and processes are used, who is involved, and who receives the outcome of the processes to determine the next steps.</p>	<p>The governance documents do not speak to the process by which the CA is selected, monitored, or evaluated. The process by which the CA is selected and monitored should be documented in governance. Entities involved in the monitoring and evaluation should ensure no conflicts of interest. The process should ensure comprehensive feedback from all interested parties.</p>	<ul style="list-style-type: none"> • CoC board • Input from CoC participating agencies, relevant committees, and the broader CoC membership • CA
<p>3.7 Revisit overall budgets and contracts maintained by the CA for CoC functions; determine whether the number of entities sub-contracted creates more burden than value and identify possible mechanisms to</p>	<p>CA spends much of its time on contract management. It would be helpful to review if any of the activities could be taken in-house.</p>	<ul style="list-style-type: none"> • CoC board/executive committee • CA

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streamline activities and reduce administrative burden.		
<p>3.8 Re-evaluate the CoC monitoring process to ensure it is not overly burdensome for agencies.</p>	<p>Where CoC monitoring contracts are overseen by the CA, it feels important to note the opportunity to review monitoring processes to be more person-centered and action-oriented. A major focus of CoC monitoring should be programmatic outcomes and qualitative experience for participants. The rigor of monitoring processes should be directly tied to basic compliance and tangible improvements.</p>	<ul style="list-style-type: none"> • CoC board • CA • Input from CoC participating agencies

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Component 4: Data, HMIS Governance, and HMIS Lead Roles and Responsibilities

Introduction

The HUD TA team reviewed all available HMIS documents, including HMIS budgets and HMIS grant annual performance reports; met with the HMIS lead staff and HMIS administrative/vendor representatives; and worked with and facilitated intentional conversations with key partners within the SNH CoC. The goals of these activities were to understand the roles, responsibilities, and decision-making structures for HMIS and provide the following recommendations to strengthen governance, ensure inclusive and equitable decision-making practices, and incorporate a continuous quality improvement process to provide opportunities for the CoC to pivot and course correct, as needed. The HUD TA team utilized [HUD’s HMIS Lead Improvement Evaluation Matrix](#) to tie together different parts of the review process (see the [Southern Nevada-specific version of the matrix](#) that was shared with the HMIS lead, vendor, and HMIS lead review team). Because HMIS has been a requirement of the CoC since the early 2000s, many communities have not reviewed the governance structures surrounding HMIS since it was implemented at the local level.

Recommendations

As the community continues to embark upon different initiatives and priorities, the following recommendations are offered as a way to ensure the HMIS that serves as the foundation from which homelessness is understood continues to meet the community’s needs and functionally addresses the community’s priorities. At its core, the HMIS meets federal regulatory requirements; the recommendations are provided, not to speak to regulatory requirements, but to offer best practices and support to ensure HMIS is functional for the community.

Recommendation	Justification	Entities Involved
<p>4.1 Conduct a comprehensive review of all HMIS governance documents on an ongoing basis (i.e., every 2–3 years) and document the process in governance.</p>	<p>The governance documents reviewed have different revision dates and are not seen as a “suite” of guidance. The governance charter, standard operating procedures, Agency Partnership Agreement, etc. all build upon each other and should be consistent within and among them.</p>	<ul style="list-style-type: none"> • CoCs • HMIS lead • HMIS administrator • Relevant committees of the CoCs with input from end user organizations
<p>4.2 Conduct a comprehensive evaluation of the HMIS lead and incorporate an HMIS lead monitoring/evaluation process into governance that identifies how often the</p>	<p>The governance documents do not speak to the process by which the HMIS lead is monitored or evaluated. The process by which the HMIS lead is selected (including the frequency of issuing an RFP) and monitored should</p>	<ul style="list-style-type: none"> • CoCs • Participating agencies

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<p>process occurs, what tools/processes are used, who is involved in the monitoring/evaluation, and who receives the outcome of the monitoring/evaluation process to determine next steps.</p>	<p>be documented in governance. Entities involved in the monitoring and evaluation should ensure no conflicts of interest. The process should ensure comprehensive feedback from all interested parties.</p>	<ul style="list-style-type: none"> • Relevant committees of the CoCs with input from end user organizations • HMIS lead • HMIS administrator
<p>4.3 Conduct a comprehensive evaluation of HMIS vendor/software and incorporate an HMIS vendor/software monitoring/evaluation process into governance that identifies how often the process occurs, what tools/processes are used, who is involved in the monitoring/evaluation, and who receives the outcome of the monitoring/evaluation process to determine next steps.</p>	<p>The governance documents do not speak to the process by which the HMIS vendor/software is monitored or evaluated by the CoC. The process by which the HMIS vendor/software is selected (including the frequency of issuing an RFP) and monitored should be documented in governance. Entities involved in the monitoring and evaluation should ensure no conflicts of interest. The process should ensure comprehensive feedback from all interested parties.</p>	<ul style="list-style-type: none"> • CoCs • Participating agencies • Relevant committees of the CoCs with input from end user organizations • HMIS lead • HMIS administrator
<p>4.4 Conduct a comprehensive evaluation of the HMIS administrator and incorporate an HMIS administrator monitoring/evaluation process into governance that identifies how often the process occurs, what tools/processes are used, who is involved in the monitoring/evaluation, and who receives the outcome of the monitoring/evaluation process to determine next steps.</p>	<p>The governance documents do not speak to the process by which the HMIS administrator is monitored or evaluated by the CoC. The process by which the HMIS administrator (if separate from the HMIS lead) is selected (including the frequency of issuing an RFP) and monitored should be documented in governance. Entities involved in the monitoring and evaluation should ensure no conflicts of interest. The process should ensure comprehensive feedback from all interested parties.</p>	<ul style="list-style-type: none"> • CoCs • Participating agencies • Relevant committees of the CoCs with input from end user organizations • HMIS lead • HMIS administrator
<p>4.5 Clarify roles, responsibilities, and decision-making structures</p> <ul style="list-style-type: none"> - Suggest walking through something like a responsibilities matrix with a diverse group of partners to identify who should be involved in any given 	<p>Many, many decisions about HMIS need to be made, both on a day-to-day basis and on a more system-level, strategic decision-making basis. Absent a clear understanding of what decisions get made where and by whom, the default is that whoever is closest to the issue makes the decision. Clear lines of authority are critical to</p>	<ul style="list-style-type: none"> • CoCs • Participating agencies • Relevant committees of the CoCs • HMIS lead • HMIS administrator

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<p>discussion about HMIS and who ultimately makes a decision</p> <ul style="list-style-type: none"> - Development of MOU between CoC and HMIS lead 	<p>ensure a shared understanding of each entity's roles and how decisions are made.</p>	<ul style="list-style-type: none"> • Other key partners within the CoC
<p>4.6 Evaluate HMIS operations decision-making for inclusiveness and transparency.</p> <ul style="list-style-type: none"> - The version of the HMIS Lead Improvement Evaluation Matrix that was used during the process over the last couple of months identifies improvement strategies and outstanding questions about how decisions are made and how HMIS is operated locally. 	<p>In discussions with people involved in the HMIS governance discussions, it was clear that there was confusion about the HMIS lead, HMIS administrator, and HMIS vendor, as well as the roles and responsibilities between and among various entities. Transparency in how decisions are made, who does what, and how partners in the community interact with the various entities is critical to ensure a functional HMIS. Governance decisions and long-term strategy for HMIS should be a community-owned process.</p>	<ul style="list-style-type: none"> • CoCs • Participating agencies • Relevant committees of the CoCs • HMIS lead • HMIS administrator • Other key partners within the CoC
<p>4.7 Clearly delineate, within Clark County Social Services, between responsibilities of the entity as the CA/CoC lead and HMIS lead to ensure no one individual is asked to do too much on behalf of a very large community and to prevent perceived and actual conflicts of interest and centralization of power.</p>	<p>Because Clark County Social Services serves in both the CA/CoC lead and HMIS lead roles, it is important to distinguish between the responsibilities they have as the CA/CoC lead and the responsibilities they have as the HMIS lead. Governance should be able to distinguish these roles as clearly as if they were held by two completely different agencies within the community. It should be possible for the community to identify different entities to serve in the roles of CA/CoC lead and HMIS lead in such a way that the two roles are not automatically assumed to have to be filled by the same agency (unless that is what the community determines is the best path forward).</p>	<ul style="list-style-type: none"> • CoCs • CA • HMIS lead • Relevant committees of the CoCs
<p>4.8 Comprehensively review how accessible data is and the processes for requesting data by various entities/partners (i.e., the public, participating agencies, funders, etc.) and create a list of reports that are reviewed</p>	<p>To be truly functional for a community, data in HMIS should be mobilized to make data-informed decisions that directly impact the homeless response system and the people served by it. A review of which reports are used to help inform which entities, as well as a review of</p>	<ul style="list-style-type: none"> • CoCs • Participating agencies • Relevant committees of the CoCs • HMIS lead

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<p>regularly that defines at what frequency they are reviewed and by which entities. Further define how reports are leveraged to make data-informed decisions; what processes are in place to request data from HMIS; and how easily different entities can access data from HMIS.</p>	<p>the processes by which people/entities can access data in HMIS will provide insight into how data-informed the community currently is and what processes could be updated to increase the accessibility and mobility of the data in HMIS to benefit those that the data is about.</p>	<ul style="list-style-type: none"> • HMIS administrator • Other key partners within the CoC
<p>4.9 Comprehensively identify and address data quality issues.</p> <ul style="list-style-type: none"> - Leverage a data quality plan to operationalize efforts to meaningfully impact data quality. - Identify areas that most directly affect the ability of the CoC to mobilize data to make informed decisions (i.e., approximate date homelessness started, project exits and destination, project types, etc.). - Determine ways to best support the people who collect, enter, and analyze the data in HMIS at every level. 	<p>To meaningfully mobilize data available in HMIS, the community needs to have a degree of confidence in the data. The data quality plan is an important component of this and should be leveraged to understand which data elements are the most inaccurate across the CoC and prioritize strategies to address these. Additionally, to have accurate reporting available, projects must be set up in HMIS with the correct project types. A review of the projects in HMIS to ensure accurate project typing would benefit the community as they look to understand system performance. Supporting end users to collect data in a trauma-informed, culturally humble manner is an emphasis of the FY2024 data standards and supports the CoC in collecting accurate data to enter into HMIS. As the community focuses on data quality, identifying what kind of support end users need to accurately collect, enter, and analyze data in HMIS will be critical.</p>	<ul style="list-style-type: none"> • CoCs • Participating agencies • HMIS lead • HMIS administrator • End users

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Component 5: Coordinated Entry (in Partnership with the Southern Nevada Lived X Consultants)

Introduction

The HUD TA team partnered with the local Lived X Consultant team; engaged in focus groups with people who are unhoused in Southern Nevada, working groups, committees, and frontline staff; conducted a community survey; and engaged in quantitative analysis primarily focused on HMIS data. In June 2023, the HUD TA team and the Lived X Consultant team delivered [CE review findings and recommendations](#) to community members as well as the CoC board.

In the SNH CoC, a CE lead entity has not been designated by the CoC. CE activities are managed through the CE system working group, which meets monthly, and a contract is in place for a non-profit housing provider to hold a matching and referral role to ensure people are appropriately prioritized and referred to housing openings. Additionally, there is a CE task force meeting monthly that focuses on the “HOT” list of people at the top of the community queue.

Focus group and community survey themes included requests for increased transparency in how prioritization is determined and referrals are made, attention to perceived or real conflicts of interest, indications of community confusion regarding the intent and goals of a CE system, a hyper-focus on completing assessments as the primary output of CE, and a desire for improvements to result from this process—there were frequent expressions of frustration from community members having been asked similar questions previously without experiencing any improvements as a result.

A primary component of the CE review was a “secret shopping” exercise designed and implemented by the Lived X Consultant team. Secret shopping focused on the access and assessment process components of CE and included 11 access point visits based on the [advertised community flier](#). Secret shoppers focused on the accuracy of advertised information, the customer service experience, and the quality of support received. Overall experience with 11 access point visits resulted in a 1.7 average score out of a possible 5 points (1=poor, 5=outstanding; see the [full system review summary](#)). Zero of 11 access point visits resulted in real-time help (safety/resolution that night), and two of 11 visits resulted in a housing assessment being completed. Primary themes cited within these experiences included poor customer service, lack of awareness of community resources at access points, problematic and inconsistent communication, lack of follow-up, and inability to get tangible support.

Quantitative analysis findings point to numerous racial and ethnic disparities in who is entering the homelessness response system (disproportionately Black, Indigenous, and Pacific Islanders), assessment scoring trends (highest for households identifying as White), how

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long it takes to get housed (disproportionately long for Asian Americans), and who is getting access to housing program resources (disproportionately households identifying as White).

Recommendations

The SNH CoC has great potential for a strong CE system that supports people who are unhoused through person-centered, trauma-informed approaches. Many people desire CE system improvements. It is recommended these improvements begin by identifying CE leadership through a designated CE lead entity and ending the practice of leadership by committee. The recommendations detailed below are not possible nor sustainable without strong leadership of a CE lead and accountability through the CoC board. Once a CE lead entity is in place, improvements can be tested and taken to scale.

A systemwide commitment to person-centered decision-making will benefit the future CE system, as policies and procedures should first center the people accessing the system with supports and infrastructure (e.g., HMIS, access points, by-name community queue) working for and in support of the system as opposed to making decisions based on current HMIS set-up, current policies and procedures, and relying on the way things have been done in the past.

Recommendation	Justification	Entities Involved
5.1 Designate a neutral and trusted CE lead entity.	Alignment with HUD requirements to operate or designate a CE system . The CE lead entity should oversee activities associated with access, the assessment process, prioritization, referral and community queue management. Currently, CE is operated/managed through a monthly committee of volunteers.	<ul style="list-style-type: none"> • CoC board • CA • Lived X Consultant team (involved in the selection process) • Other potential funding partners
5.2 Fund and implement HPS system-wide.	Per the secret shopping review, zero of 11 households were engaged in HPS or housing-focused discussions. The system is missing opportunities to divert or rapidly exit up to 50 percent of families and 30 percent of single adults who access the homeless response system.	<ul style="list-style-type: none"> • CoC board • Funding jurisdictions • Lived X Consultant team • CE access points
5.3 Shift from assessment tool focus (output) to an assessment process that emphasizes real-time help and resource connection (outcome).	Per the secret shopping review, zero of 11 households received real-time help or connection to system-wide resources; two of 11 households received a housing assessment and inconsistent messaging/information. Examples of necessary	<ul style="list-style-type: none"> • CA, until the CE lead is established • CE systems working group • Lived X Consultant team

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	<p>improvements include establishing supported (trained, resourced, monitored) access points, developing consistent messaging and materials regarding CE process and expectations, frequently updating the CE flier, and updating access point websites frequently including hours/days/address).</p> <p>Consider implementing a phased assessment approach, starting with triage, HPS, and resource connection, and then only completing a full housing assessment when no other option is viable. Access points need to connect households to all possible system resources, not limited to only what their organization can offer.</p> <p>Shelter coordination will be a critical component of establishing options for real-time resources; the system currently lacks coordination.</p>	<ul style="list-style-type: none"> • CE access points
<p>5.4 Establish a priority pool of the people on the community queue and engage in housing-focused case conferencing.</p>	<p>Referrals are frequently unsuccessful due to the inability to locate people at the top of the queue who are being referred to housing program openings. Establish a priority pool of the people who will likely receive a housing referral within 60 days and host regular case conferencing focused on keeping prioritized people located, document collection, housing preferences, and barrier reduction.</p>	<ul style="list-style-type: none"> • CA, until CE lead is established • HUD TA • HELP (matcher and referral contracted agency) • Case conferencing teams (formerly the CE task force)
<p>5.5 Revise the housing assessment tool.</p>	<p>This is not a suggestion to completely revamp/rewrite the tool, but a revision to a condensed trauma-informed set of critical questions used for prioritization. Currently, there are duplicate questions asked in intrusive ways without adequate explanation of why questions are being asked. There are also questions being asked that are not used for any purpose; eliminate excessive data collection and reduce to only the data necessary for decision-making and evaluation.</p>	<ul style="list-style-type: none"> • CA, until CE lead is established • Lived X Consultant team • CE systems working group

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<p>5.6 Provide strong, recurring training to access points and CE partners.</p>	<p>Access points currently receive HMIS data input training and nothing else consistently. Trainings are needed on the purpose and process of CE, appropriate and accurate messaging about process and expectations, HMIS database, having person-centered and empathetic interactions, knowing local resources, vicarious trauma, and effective HPS.</p>	<ul style="list-style-type: none"> • CA until CE lead is established • Lived X Consultant team • CE access points
<p>5.7 Determine plan and options for continuous wrap-around services for people as they are housed.</p>	<p>Ensure follow-through for referrals and wrap-around services for people as they are housed so they are less likely to return to homelessness. Beyond some local programming (e.g., OH! RRH), wrap-around services are lacking for people being housed and direct service providers commonly see people returning to the homeless system after being housed.</p>	<ul style="list-style-type: none"> • CoC board • CA • Funding jurisdictions
<p>5.8 Establish measurements and metrics to understand system effectiveness.</p>	<p>Establish measurements and metrics to know what's working and what needs to be improved (e.g., HPS metrics, housing outcomes, customer service). These should be monitored by the CoC board and include continuous improvement processes to address negative outcomes/issues.</p>	<ul style="list-style-type: none"> • CoC board • CA • HMIS lead and vendor • Funding jurisdictions • CE systems working group • Lived X Consultant team • CE access points

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Appendix A: Possible CoC Board and Executive Committee Makeup

CoC Board Makeup

CoC Board (19 Voting Members; 3 Ex-Officio Members)									
CoC Core Function Committee Chairs			Lived Expertise		Community Reps	Con Plan	Ex Officio		
CoC Program Committee (1)	Coordinated Services Committee (1)	HMIS Steering Committee (1)	Youth Advisory Board (2)	Lived X Consultants (2)	CoC Member Elected Representation (8) <i>Min. 3 service providers</i>	Jurisdictions (4)	CA (1)	HMIS Lead (1)	CE Lead (1)

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CoC Executive Committee Makeup

Draft CoC Board Executive Committee (Option 1: One-Year Terms)

Option 1: One-Year Leadership Terms—CoC Executive Committee (9 Members, 3 Ex-Officio Members)									
Board-Elected Leadership			Lived Expertise		Community Reps	Con Plan	Ex Officio		
Past Chair (1)	Current Board Chair (1)	Vice-Chair (Chair-Elect) (1)	Youth Advisory Board (1)	Lived X Consultants (1)	Board-Elected (3) <i>recommend a min. of 2 service providers</i>	SNRPC Representative (1)	CA (1)	HMIS Lead (1)	CE Lead (1)

Draft CoC Board Executive Committee (Option 2- two year terms)

Option 2: Two-Year Leadership Terms—CoC Executive Committee (7 Members, 3 Ex-Officio Members)								
Board-Elected Leadership		Lived Expertise		Community Reps	Con Plan	Ex Officio		
Board Chair (1)	Vice-Chair (Chair-elect) (1)	Youth Advisory Board (1)	Lived X Consultants (1)	Board-Elected (2) (recommend a min. of 1 service providers)	SNRPC Representative (1)	CA (1)	HMIS Lead (1)	CE Lead (1)

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Appendix B: CoC Committees

Committee	Membership	Purpose	Meetings	Responsibilities
CoC Program Committee	-Committee-elected chair -CoC recipients agencies - Lived X Consultants -ESG recipients -HMIS lead -People with lived experience	CoC program performance, strategy, compliance, and improvement	Monthly	-Collaborative application -Local competition management -CoC project support -Project monitoring, evaluation, and performance improvement -Coordination with Consolidated Plans and ESG recipients -Support CA monitoring and evaluation
Coordinated Services Committee	-Committee-elected chair -CE lead -Providers -Access points -People with lived experience -HMIS lead -CA	Functional, person-centered CE and services	Monthly	-Access site training, coordination, and evaluation -Community queue management -Equitable outcomes for access, assessment, prioritization, and referral -Case conferencing for rapid housing placement -Provider training and coordination -Support CE and CE lead monitoring and evaluation
HMIS Steering Committee	-Committee-elected chair -HMIS lead -Bit focus -HMIS users -People with lived experience	HMIS governance, oversight, monitoring, evaluation, and improvement	Monthly	-HMIS management -Data and evaluation tool distribution -Ensure that other committees have access to necessary reports -Chair of committee would sit on CoC board and statewide HMIS governance committee -Support HMIS lead and vendor monitoring and evaluation
Lived X Consultants	Determined by Lived X Consultants by-laws	Bring the perspective of lived expertise to CoC strategy and decision-making	Closed; frequency determined by Lived X Consultants	-Sit on decision-making bodies and CoC committees -Elect CoC board and executive committee representatives -Develop ongoing pathways to gather input from, and center the voices of, people with lived experience of homeless

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Youth Advisory Board	Determined by youth advisory board by-laws	Bring the perspective of lived expertise to CoC strategy and decision-making	Closed; frequency determined by youth advisory board	<ul style="list-style-type: none"> -Sit on decision-making bodies and CoC committees -Elect CoC board and executive committee representatives -Develop ongoing pathways to gather input from, and center the voices of, young people with lived experience of homelessness
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Potential additional committees may include housing or a funders' collaborative in the future. The goal is not to keep to a specific number of committees/working groups but to ensure those groups are coordinated, supported, and taking action to end homelessness.

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Appendix C: SNH CoC Proposed Governance Structure

