

# Benefits of a Regional CoC

## Executive Summary

The Central Florida region has made remarkable progress toward the goal of ensuring that homelessness is rare, brief and one-time. For reasons outlined below, this paper clarifies the position that maintaining the tri-county Regional Continuum of Care (CoC) is overwhelmingly preferable to the risks associated with bifurcation and fragmentation.

Importantly, the unified tri-county Regional CoC maximizes the prospects for HUD funding for the region. Larger CoCs are more successful, a key reason HUD encourages and incentivizes CoC mergers. Looking at Florida CoC's with populations less and greater than 500,000, in the most recently announced HUD competition (FY 2017) the smaller CoCs' per capita award amounts averaged only 47% of their larger CoC counterparts.<sup>1</sup> At the same time, the CoC encourages region-wide investment without limiting jurisdiction-specific initiatives or contributions. The Regional CoC also optimizes resources by simultaneously avoiding the inefficiency of a duplicate Lead Agency infrastructure and the fragmentation of a "Balance of State" CoC.

In addition to the benefits to funding opportunities, the Regional CoC best serves the region as it capitalizes on the existing homelessness service infrastructure that accommodates how homeless people move throughout the tri-counties, places fewer administrative and programmatic burdens on providers, mirrors the larger regional planning infrastructure, and ensures that data captures a holistic picture of the region's homeless activities.

Most importantly, the Regional CoC is in the best interest of homeless people. Individuals and families caught in homelessness are not driven by zip codes or jurisdictional lines. It is imperative that our region continue to work together to minimize barriers and improve our system to effectively ensure that homelessness is brief, rare and one time.

## Conclusion:

The Regional CoC (Central Florida CoC FL-507) is widely recognized as one of the strongest CoCs in the state of Florida. Partners across the region have invested heavily in improving the outcomes for homeless people and through that work have made incredible strides in a short period of time. Moving forward there will continue to be opportunities to improve the system, increase its responsiveness to service agencies and jurisdictional partners and strengthen its data collection and reporting capacity. All of these improvements can be accomplished within the Regional CoC framework without incurring unnecessary additional costs and simultaneously risking funding or effectiveness. The costs and benefits of bifurcation must be weighed first and foremost by the question, "What is best for those experiencing homelessness?" Disruption of the current Regional CoC could only be justified if - beyond any reasonable doubt - the change benefits our most vulnerable citizens. A split in the current Regional CoC does not pass that central test at this time.

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<sup>1</sup> Based on analysis of FY 2017 awards. See <https://www.hudexchange.info/grantees/allocations-awards/>

# Benefits of a Regional CoC

## Introduction:

This region's county and city governments have joined efforts with private sector philanthropic leaders and social sector agencies to build a truly collaborative system of care. This region-wide endeavor resembles a construction project: Plans were laid out, an obsolete structure was cleared, construction barriers were erected and new equipment was acquired. Once the work started in earnest, the construction was initially disruptive and messy as a brand new building method was employed. The construction workers required retraining. Extensive site-work was time-consuming and essential as a new and strong foundation was poured. Now, even as the emerging structure is clearly visible and is increasing in functionality, the builders are asked to wrestle with the question of whether to reverse course and rethink the architecture.

The Central Florida region has made remarkable progress, especially since 2015, toward achieving the shared goal of ensuring that homelessness is rare, brief and one-time. To accomplish this, the region embraced a significant paradigm shift with respect to how it responds to the needs of our homeless neighbors. It moved away from an emphasis on quantity of services and embraced a Housing First orientation and data-driven system performance measurement. As a result, we have ended homelessness for more than 800 formerly chronically homeless people who now live in Permanent Supportive Housing while hundreds of families experiencing homeless have sustained permanent housing through Rapid ReHousing programs. These outcomes have been realized through the efforts of a collaborative of agencies. These agencies work together under the umbrella of a Regional Continuum of Care (CoC) - to develop and implement a new homelessness response system grounded in evidence-based best practice.

## Problem Statement:

Regardless of best intentions, efforts to bifurcate the current regional Continuum of Care along county/municipal lines risks harming the nascent foundation of a system making significant gains in combating homelessness.

Since 1994, the Central Florida region has partnered across jurisdictional lines to implement a system of care for our region's homeless population. Local governments have joined housing and service providers to engage in a continuous improvement process that aims to end the homelessness of our most vulnerable neighbors. Periodically, including in both 2014 and 2018, the region has formally assessed this system of care, most recently with former U.S. Interagency Council on Homelessness Executive Director Barbara Poppe's analysis which resulted in "Central Florida's Roadmap Home: Strategic Actions to Impact Homelessness" published by the Central Florida Commission on Homelessness.

In 2015, the Regional Continuum of Care (CoC) launched a significant systems improvement initiative centering on adoption of the Housing First philosophy and prioritization of the most vulnerable for assistance. Housing First, which has now permeated almost every level of service in the regional

responses to homelessness, emphasizes direct access to permanent housing and housing-focused case management supports for all persons experiencing homelessness. The implementation of this approach only recently completed its pilot phase.

Given the system's current capacity, institutional knowledge and foundation of ongoing practice-based improvements, the region is primed to bring its efforts to scale. While the reinvigorated Regional CoC is committed to further evolution driven by evidence-based and emerging best practices, some voices within the Central Florida community have expressed concerns with the current tri-county regional system configuration. In response, CoC FL-507 members have asked for a document itemizing the benefits of the current regional approach.

## Key Terms:

A **Continuum of Care** (CoC) is a group of freely associated stakeholders organized to build community consensus around a sustained effort to end homelessness. The CoC also plays the important role of carrying out the responsibilities required to receive funding through the U.S. Department of Housing and Urban Development (HUD). The CoC is comprised of a diverse array of representatives from nonprofits, victim service providers, faith-based organizations, units of government, businesses, advocates, public housing agencies, school districts, homeless and social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement agencies, veterans organizations, and homeless and formerly homeless persons from across the region.<sup>2</sup> In a recent collective planning exercise, members of the current Regional CoC (FL-507) described this CoC as *"a network of agencies and concerned citizens endeavoring to be a dynamic, collaborative, policy driven, data focused learning community to ensure homelessness is brief, rare and one-time."*

The **Lead Agency**, also referred to by HUD as the Collaborative Applicant, is designated by each CoC to prepare and submit funding requests to HUD on behalf of the CoC. Since 1994, the Homeless Services Network of Central Florida has served as Lead Agency for the tri-county region. In addition to administering the HUD funding, the Lead Agency is tasked with the responsibility of shepherding the CoC through its ongoing planning and evaluation process.

The **Homeless Management Information System (HMIS)** is a client and project-level data management system and framework encompassing a CoC's coverage area. HMIS is used to monitor performance, identify trends and track client services area-wide. Although all HMIS implementations are governed by federal standards, the system is operated by the CoC's designated lead generating aggregate-level reports to inform the system without sharing any client level detail with HUD.

The **Coordinated Entry System (CES)** is a HUD-required, CoC-wide mechanism that standardizes intake and decision-making processes to facilitate linking of clients to the most appropriate housing and service options based on available provider resources and CoC prioritization. CES ensures that limited resources are targeted to the most vulnerable homeless individuals and families and links homeless people to the most appropriate housing and services option.

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<sup>2</sup> 24 CFR §578.3

## Position:

The considered position articulated in this white paper is that maintaining the current tri-county Regional CoC is overwhelmingly preferable to the unknown risks associated with bifurcation and fragmentation. The present structure provides greatest assurance that current funding availability will be maintained or increased. Furthermore, the Regional CoC leverages significant economies of scale that strengthen services and optimize the use of limited resources in support of persons experiencing homelessness, promote service excellence by community non-profit providers, and preserve opportunities for targeted local contributions and jurisdiction-specific investments.

As explained below, these benefits have been and will continue to be best realized through participatory/collaborative planning; a robust and expanding coordinated entry process; growing awareness of the value of data and data-driven decision-making; region-wide HMIS competency; and considerable professional practice enhancement and provider capacity development. The regional scope provides a necessary and solid foundation for future collaborative action towards ending homelessness in Central Florida.

### **The unified tri-county Regional CoC maximizes the prospects for maintaining or increasing HUD funding for the region as a whole, as well as for its constituent jurisdictions.**

Larger CoCs have been considerably more successful in building strong homelessness assistance systems and accessing HUD funding than smaller CoCs, even after adjusting for population. This notion has been confirmed both by HUD officials<sup>3</sup> and Continuum of Care award amounts. In particular, Norm Suchar, Director of HUD's Special Needs Assistance Program Office, which oversees all HUD homelessness assistance programs, affirmed this reality as a key reason that HUD is encouraging and incentivizing mergers rather than splits amongst CoCs across the nation. He stressed that smaller CoCs often struggle in the federal competition and on average earn considerably lower scores, which are correlated with lower levels of funding.

Eleven of Florida's 27 CoCs serve coverage areas with a total population of less than 500,000 residents. In the most recent HUD competition for which funding awards have been announced (FY 2017), these smaller CoCs' per capita award amounts averaged only 47% of their larger Florida CoC counterparts.<sup>4</sup> Thus, while it is possible that the region could be awarded a greater amount of funding after a split, pointed evidence suggests that precisely the opposite would be true. As the federal grant process has become increasingly competitive, regional leaders would be wise to avoid making choices that HUD has already signaled could put existing funds in jeopardy.

### **The Regional CoC encourages region-wide investment without placing limitations on jurisdiction-specific initiatives or contributions.**

The Regional CoC has the capacity to administer funding whether made available to the full tri-county system or to sub-regional projects. Similarly, investors who wish to support efforts confined to one jurisdiction are able to contribute directly to that jurisdiction, directly to the specific project, or to the Lead Agency to administer the funds on behalf of the project or jurisdiction. The Regional CoC already

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<sup>3</sup> Teleconference with Norm Suchar, 3/23/18.

<sup>4</sup> Based on analysis of FY 2017 awards. See <https://www.hudexchange.info/grantees/allocations-awards/>

supports projects at the regional, county and municipality levels that require tracking unique eligibility requirements and expenditures. Thus, a Regional CoC affords funders with maximum flexibility, while encouraging region-scale investors who may view investment in multiple or smaller CoCs as a riskier proposition. The Regional CoC also encourages participation by investors who place value on providing support for a system rather than for just one agency.

**The Regional CoC optimizes resources by simultaneously avoiding the inefficiency of a duplicate Lead Agency infrastructure or the fragmentation of a “Balance of State” CoC.**

While it is true that extremely large CoCs across the country struggle to understand and be responsive to the unique needs of each of their participating counties and regions, the current Regional CoC is small enough to maintain genuine connection and contact with the participating jurisdictions. At the same time, the region saves costs that would be incurred by establishing multiple Lead Agencies, each of which would have to comply with HUD requirements for CoC infrastructure and perform labor-intensive activities such as preparing the annual federal submission to HUD and implementation of an HMIS. Similarly, although repurposing current agency staff to serve as Lead Agency staff may not require additional funding, the proposed new Lead Agency would, at a minimum, experience a loss in productivity associated with time and energy repurposed away from current activities.

**The Regional CoC capitalizes on the existing homelessness service infrastructure and the reality of housing and service utilization patterns of the region’s homeless population.**

An array of factors combine to define the meaningful coverage area for a system response to homelessness that is clearly tri-county in scope. These include: 1) the regional economic system, and particularly its transportation and workforce components, 2) a lack of significant topographical or structural barriers that disconnect the geography, 3) the clustering of affordable housing and relevant health and human services, and 4) location of population-specific and specialty services. The Regional CoC is best positioned to support that regional infrastructure and maximize the ability of homeless people to access the housing and services based on each homeless household’s unique needs. The Regional CoC also minimizes the risk of agencies establishing policies or funders establishing requirements that preclude access to services based solely on geography.

At the same time, the Regional CoC is fortunate to have high-quality service providers who are committed to providing effective services to populations experiencing homelessness across a tri-county coverage area. The Regional CoC provides an infrastructure that supports access to the highest quality of and greatest choice among services without diluting effectiveness.

**The Regional CoC is able to operationalize additional regional system-wide solutions.** The Central Florida region has made rapid strides in developing a complex homeless response system that has demonstrated improved effectiveness and outcomes in a very short period of time. The creativity and commitment of our region suggests that it will continue to develop strategies that require regional implementation that can best be coordinated by a Regional CoC. Even as jurisdictionally based pilot initiatives show promise, the Regional CoC provides the most strategic platform to assist with implementing the lessons learned from these emerging best practices across jurisdictional lines. For example, in the area of partnerships with law enforcement and the court system, unique efforts have arisen across the region, including the Seminole County Sheriff’s partnership with Aspire Health Partners, the Circuit 9 Public Defender’s partnership with case managers for chronically homeless

individuals, and the Orange County Jail's significant work in documenting homelessness in HMIS. Each of these efforts can be replicated throughout the region with support from the Regional CoC. At the same time, the Regional CoC is taking steps to be more responsive and inclusive of stakeholders who find transportation to regional meetings challenging by coordinating Seminole and Osceola County-specific meetings on at least a quarterly basis.

**Current region-wide providers - as well as single-jurisdiction providers that are considering expanding their services footprint - have fewer administrative and programmatic burdens with one Regional CoC.**

The agencies across our region work hard to provide quality housing and services and meet all programmatic, funding, reporting and administrative requirements. Being an active part of the CoC already requires tracking client information in HMIS and attending multiple meetings, including, but not limited to, meetings required by HUD. Each year agencies have to complete time-consuming applications for funding as well as quarterly, and sometimes monthly, reports. The process to request reimbursement for expenses is also time consuming. The Regional CoC prevents agencies from having to duplicate all of these activities in their efforts to meaningfully participate in regional efforts. Undoubtedly there will be additional onerous financial impacts to dozens of agencies in our region, should duplication of activities be required, and no identified funding source to cover those costs.

**A singular, regional HMIS maximizes the system's ability to assess and analyze numbers and trends across the region.**

The creation of a second HMIS system within the region would lead to additional costs and increased fragmentation, even if it was successful in establishing protocols for data sharing across CoCs. Given the mobility of homeless people across the region, the result would be increased expense and/or poorer regional data for the purposes of inter-agency communication, monitoring trends and tracking outcomes. The regional HMIS facilitates deeper and broader analysis as seen in recent reports and publications. Multiple HMIS systems, however, increase the chances that jurisdictions will have less information about their homeless populations resulting in a lack of clarity about homelessness across the region. At the same time, the agencies that would have to enter data into two different systems would likely have to redirect resources that could have gone into services and housing towards this additional administrative requirement.

**HMIS improvements have positioned the Regional CoC to expand its reporting capacity in partnership with local jurisdictions and other CoC stakeholders.**

Data improvements started with intentional investment by the Homeless Management Information System (HMIS) Lead Agency and HMIS users to improve the quality of data captured in the system. This enhanced quality facilitated additional advances in data-driven decision-making. Furthermore, the HMIS Lead Agency has a renewed prioritization on services to CoC members and stakeholders. A new system-level dashboard has been identified as one of the best in the country by national expert Barbara Poppe. Other reporting expansions will open up significant opportunities for integrating data from selected data sources into combined reports once privacy and confidentiality protocols are established and implemented. The result will be significant improvements in the quantity and quality of data available that the homeless services system as a whole, as well as individual agencies and jurisdictions, can use to inform planning, policies, procedures and program implementation.

**The single Homeless Management Information System (HMIS) also supports the regional Coordinated Entry System (CES).**

Multiple CoCs would require extensive time and effort in developing policies, procedures and protocols, which also correlates to expense, for any CES referral of services between the CoCs, if there was an interest in doing so. The burden also extends to the agencies that would have to participate in two CES processes. Even more importantly, homeless people who find themselves crossing jurisdictional boundaries seeking assistance would be challenged by the increased complexity involved in negotiating two separate systems while those systems have additional barriers in coordinating the services.

**The Regional CoC allows for healthy competition among providers and even jurisdictions, without forcing partnering jurisdictions to compete against each other for funding in federal competitions.**

Within our regional system agencies already vie for local funding and strive to create better programs – sometimes motivated by friendly competition and always motivated by the desire to create the best projects possible. The Regional CoC ensures, however, that the region is able to use those friendly rivalries to maximize the federal investment with other funds and resources, rather than risking a competition between jurisdictions that could lead to reduced funding for the region as a whole.

**The Regional CoC more closely mirrors the scope of other entities that work to end homelessness on a regional level.**

Most notably, the Central Florida Commission on Homelessness and Community Resource Network were both established with regional footprints, in recognition that a region-level implementation would be most effective at ending homelessness. Other key partners, including the Veterans Administration and Central Florida Foundation also have a multi-county footprint. The Regional CoC is best suited to implement the initiatives supported by these regional partners. This footprint also facilitates the Regional CoC's ability to engage a maximum number of stakeholders, including those with solo jurisdictional and multi-jurisdictional catchment areas. The Regional CoC is committed to expanding recent efforts to engage stakeholders, including non-traditional homeless service agencies and interested parties including the criminal justice system, school systems, health care, universities, first responders, faith communities, sub-population specific providers (ex. domestic violence, human trafficking, substance use, mental illness, youth, those for whom English is a second language, etc.) and others as it takes steps in continuous quality improvement and maximum engagement.

**The Regional CoC's changes to its governance structure are responsive to recognized best practices for CoCs and Lead Agencies and conducive to strong jurisdictional oversight.**

Beginning in the mid-1990s, the governance structure of many - if not most - CoCs across the country included having one board of directors that served as both the CoC policy board and the Lead Agency corporate board. While this region mirrored that practice for many years, by 2015, the Regional CoC had undertaken a wholesale change in Board membership, removing all representatives of funded agencies while strengthening jurisdictional and corporate representation. Governance changes continued in 2017, when the Regional CoC Board was separated from the Lead Agency corporate board. Each of the three counties and primary municipalities hold a designated seat on both the CoC and Lead Agency Boards. This ability for jurisdictions to select the representative of their choice facilitates their oversight of CoC activities. Additionally, both Boards address conflicts of interest by excluding funded agency members and including a formerly homeless individual. Two CoC member-elected representatives also serve on the CoC Board.

**The Regional CoC has experienced dramatic improvements in its shift to Housing First.**

Providers across the region moved forward in good faith to develop a solid Housing First homeless response system. The strong results include a robust Coordinated Entry System (CES) that prioritizes those most in need of housing intervention; improved data quality in the Homeless Management Information System (HMIS) enhancing the region's ability to make data-driven decisions to improve system performance; coordinated shelter and outreach activities ensuring newly homeless are quickly identified and navigated to eligible housing resources; shelter providers collaborating during extreme weather events; and significant coordination between Veteran and non-veteran projects to serve veterans who are not eligible for VA funded projects. Currently the CoC is working with USICH to certify effectively ending Veterans homelessness in Central Florida by the end of 2019; multi-agency interventions are tackling service resistant, high-need clients; expanded HMIS participation including publicly funded criminal justice systems is closing institutional discharge gaps; improved transparency with a publicly available HMIS system-wide dashboard is increasing data competency; and monitoring of project outcomes using key performance indicators in user-friendly project dashboards encourages provider attentiveness towards better project outcomes.

However, assessing the effectiveness of any one specific project or initiative over the past three years cannot be done in isolation from the major reallocation of federal resources that began with the FY2015 funding. At that time the CoC reallocated nearly five-million dollars away from housing-readiness programs to ramp up Housing First initiatives. This reallocation was made possible by the private philanthropy and jurisdictional investment that provides the required federal match - but also provides the support required to make the projects effective in ending homelessness. The region benefits from continued investment in the system and the agencies that have supported that system rather than risk slowing down system development by having to recreate these achievements with new infrastructure. Similarly, forcing a new system will discourage partners who restructured agencies and programs to embrace the regional paradigm shift and would find that fragile, but powerful new system being threatened.

**The Regional CoC is in the best interest of homeless people.**

Individuals and families caught in homelessness are not driven by zip codes or jurisdictional lines. They are driven to survive using whatever resources they can to support them in efforts to end their homelessness. The system must be able to operationalize projects and programs region wide if we want to minimize the trauma of homelessness and support rapid recovery. Many in our region have recently participated in Cost of Poverty Experience (COPE) exercises. Through that simulation participants are confronted with the many barriers that homeless people in our community already face and came to recognize the value of reducing, rather than increasing barriers. Multipolar systems of care add complexity and frustration to the daily lives of individuals and families trying to navigate their way home. It is imperative that our region continue to work together to minimize barriers and improve our system to effectively ensure that homelessness is brief, rare and one time.

## **Conclusion:**

The Regional CoC (Central Florida CoC FL-507) is widely recognized as one of the strongest CoCs in the state of Florida. Partners across the region have invested heavily in improving the outcomes for homeless people and through that work have made incredible strides in a short period of time.

Moving forward there will continue to be opportunities to improve the system, increase its responsiveness to service agencies and jurisdictional partners and strengthen its data collection and reporting capacity. All of these improvements can be accomplished within the Regional CoC framework without incurring unnecessary additional costs and simultaneously risking funding or effectiveness. The costs and benefits of bifurcation must be weighed first and foremost by the question, “What is best for those experiencing homelessness?” Disruption of the current Regional CoC could only be justified if - beyond any reasonable doubt - the change benefits our most vulnerable citizens. A split in the current Regional CoC does not pass that central test at this time.

Central Florida is touted around the nation for bold public/private sector leadership towards ending homelessness. A new and necessary foundation for ongoing regional collaboration is now in place. Our efforts show significant and demonstrable return on investment. No doubt, the rapid system construction process was messy. Providers, advocates, funders, and jurisdictions alike are rightfully grappling with the next phase of construction. Regardless, the foundation is solid. Now is not the time to change form and function. Now is the time to press on and reap the accumulating benefits of our collective efforts--the results of which are more Central Floridians escaping the trauma of homelessness.