

HEARTH Act Requirements **Coordinated Assessment, Program Monitoring, Program Evaluation and ESG Collaboration**

Coordinated Assessment

A coordinated assessment system is the Continuum of Care's (CoC) approach to organizing and providing services to persons experiencing a housing crisis within a specific geographic area. The primary function of a coordinated assessment system is to make rapid, effective, and consistent client to housing and service matches, regardless of client's location within the CoC, by standardizing the access and assessment process and by coordinating referrals across the CoC.

Under the CoC Program interim rule, the CoC is required to establish and operate a coordinated assessment system in consultation with recipients of the Emergency Solutions Grant program (ESG). The Continuum must also develop a specific policy to guide the operation of the coordinated assessment system on how its system will address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim service providers.

There are three required core operational components:

1. Access
 - Covers the geographic area of the CoC
 - Easily accessible by individuals and families seeking homeless or homelessness prevention services
 - Well advertised
2. Assess
 - Must use a comprehensive and standardized assessment tool
 - HUD does not require the coordinated assessment to determine eligibility
3. Assign
 - Referral provided for housing and/or services for individuals and families experiencing a housing crisis
 - CoCs must establish written standards for administering projects, including eligibility criteria

There are several options for coordinated access models. These include:

- Assessment hotlines (2-1-1)
- Single point of access
- Multi-site centralized access
- No wrong door

References: CoC Program Interim Rule 578.7 (a) (8), (9) and 578.23 (c) (9)

Program Monitoring

Under the CoC Program interim rule there are two types of monitoring that are required and who is responsible for each is different. The first type of monitoring is project-level compliance monitoring and the second type is project- and system-level monitoring.

The first type of monitoring is project-level compliance monitoring. This type of monitoring is the responsibility of recipients of Housing and Urban Development (HUD) funded programs. The CoC Program interim rule requires recipients to ensure the operation of their project(s) in accordance with the provisions of the McKinney-Vento Act and all requirements under the CoC Program and to monitor any of their subrecipients at least annually to ensure compliance with the requirements of the CoC Program. If the recipient determines that a subrecipient is not complying with a program requirement or its subrecipient agreement, the recipient must take one of the actions listed in paragraphs (a) and (b) of section 578.107 of the CoC Program interim rule.

The second type of monitoring required by the CoC Program interim rule is project- and system-level performance monitoring. This type of monitoring is the responsibility of the Continuum of Care. The interim rule requires CoCs to consult with recipients and subrecipients to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers.

The CoC retains all of its responsibilities, including monitoring performance, even if it designates one or more eligible applicants to apply to HUD for funding on its behalf. The CoC may, however, designate another organization, workgroup, or subcommittee to carry out any of its functions, including performance monitoring, on its behalf. If the CoC chooses to do this, it must document this designation in its governance charter.

The monitoring costs incurred by the CoC for project- and system-level performance monitoring are an allowable cost to charge to a CoC planning grant.

References: CoC Program Interim Rule 578.7 (6); 578.39 (c); and 578.103 (1) (ii)

Program Evaluation

Under the CoC Program interim rule, the CoC is required to consult with recipients and subrecipients to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers.

The performance measurement responsibility is instrumental in the system planning and the goal of the CoC in ensuring that resources and services are coordinated in a way that moves the CoC toward its goals of ending and preventing homelessness. It is also imperative as a way for the CoC to be held accountable for its funding decisions.

All Continuums are expected to evaluate outcomes of projects funded under both the CoC and the ESG programs and to make subsequent funding decisions to improve performance.

HEARTH establishes clear system-level performance measures that include:

- Length of time homeless
- Recidivism (subsequent return to homelessness)
- Access/coverage (thoroughness in reaching homeless persons)
- Overall reduction in number of persons who experience homelessness
- Job and income growth for homeless persons
- Reduction in first time homelessness
- Other accomplishments related to reducing homelessness

Additionally, the annual Notice of Funding Availability (NOFA) could establish additional project- and system-level performance measures on which funding decisions could be based. For instance, in the FY2013-FY2014 CoC Program NOFA, ending chronic homelessness was a system-level performance measure.

References: CoC Program Interim Rule 578.7 (a) (6) and (7); McKinney-Vento Homeless Assistance Act as amended by S.896 the HEARTH Act of 2009, Section 427 (b) (1) (a)

ESG Partnership

Under the HEARTH Act, recipients of Emergency Solutions Grants program (ESG) funds are required to coordinate with recipients of CoC Program funds, and participate in the Homeless Management Information System (HMIS). This coordination includes some items mentioned above, which are repeated here:

- Evaluate outcomes of projects funded under the ESG program and CoC program, and report to HUD;
- Establish and operate either a centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services;
- Establish and consistently follow written standards for providing Continuum of Care assistance that includes policies and procedures for evaluating individuals and families' eligibility for assistance, policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance, policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid re-housing assistance, standards for determining what percentage or amount of rent each program participant must pay while receiving rapid re-housing assistance, and policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and Consult with State and local government Emergency Solutions Grants program recipients within the Continuum's geographic area on the plan for allocating Emergency Solutions Grants program funds.

References: CoC Program Interim Rule 578.7 (c) (5); HEARTH Act Section 427 (b) (1) (a); ESG Interim Rule 576.107 (a), 576.400 (a) (b) (d) and (e), 576.500 (g) and (m)