

OC Partnership to End Homelessness is inviting comments on

The U.S. Department of Housing and Urban Development's (HUD) New Interim Regulations for Continuum of Care (CoC) Program

OC Partnership is collecting comments from Friday, August 3rd to Thursday, August 16, 2012 for discussion at the joint Implementation Group meeting on Friday, August 17th at 9:30am (held at Covenant Presbyterian in Orange, CA).

Background: In 2009, the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) consolidated the three separate homeless assistance programs (Supportive Housing Program, Shelter Plus Care and Moderate Rehabilitation/Single Room Occupancy) administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program. Under HEARTH, the Emergency Shelter Grant program was renamed the Emergency Solutions Grants program (ESG) and broadened existing emergency shelter and homeless prevention programs, and added rapid re-housing activities. In addition, the HEARTH Act codified into law the Continuum planning process, which has been a part of HUD's funding application process by providing greater coordination in responding to the needs of the homeless. Finally, the Act created the Rural Housing Stability program to replace the Rural Homelessness Grant program.

The interim HEARTH regulations for HUD's consolidated CoC program have been officially published in the Federal Register. They will go into effect on August 30, and public comments will be due to HUD by October 1. You can make comments directly to HUD; however, our hope is to compile everyone's comments from our CoC, and give to the Commission to End Homelessness prior to this deadline, in order to have greater community impact with HUD.

The regulations, as well as a 19-page *Introductory Guide to the CoC Program*, can be viewed and downloaded here: http://www.hudhre.info. The new interim rules discuss eligible activities and program requirements for the CoC program which will have five eligible components:

- Permanent housing (which includes permanent supportive housing for people with disabilities and rapid rehousing);
- Transitional housing;
- Supportive services only;
- Homeless Management Information Systems (HMIS) activities; and
- Prevention, which is available only to CoCs designated as High Performing Communities.

Along with describing the CoC program, the interim rules address other requirements for CoCs, such as the development of a governance structure, which includes a board; operating a centralized or coordinated assessment system; and ensuring participation in HMIS. The new regulations for the ESG program were published in December 2011 and became effective in January 2012. Regulations for the new Rural Housing Stability Program will be published separately at a later date.

Our CoC is working on a comment letter for the Commission and would like to hear from you to ensure we address the most important issues for our Continuum. As you review the interim rules, please be sure to focus on the sections HUD specifically asks for comments. How to submit your comments to OC Partnership: Please send us all comments by email no later than Thursday, August 16, 2012, to publiccomments@ocpartnership.net. To ensure that we receive your correspondence, please put "Comments on Interim CoC Rules" in the subject line of your email.

If you prefer to submit your comments directly to HUD, we would appreciate you sharing them with us at publiccomments@ocpartnership.net. You may submit comments to HUD at www.regulations.gov.