System Coordination Committee  
Meeting Materials, June 13th, 2018

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SYSTEM COORDINATION COMMITTEE AGENDA
6-13-2018

1. Director’s Report 2:00-2:10pm

2. Urgent Items 2:10-2:20pm
   a. Reminder to send any urgent items to Director, Chair, Co-Chair in advance
   b. On-Boarding Shelter into Coordinated Entry

3. Action Items 2:20-4:00pm
   a. Recommendation to replace Dana Bailey with Jessica Lobedan, Management Analyst, City of Hayward (2:20-2:30pm)
      i. Procedure
      ii. Introduction
      iii. Call to Vote
   
   b. Recommendation for Preference Policy for Permanent Supportive Housing (2:30-3pm)
      i. Presentation of Recommendation
      ii. Comments from Director
      iii. Call to Vote
   
   c. Standards for Case Conferencing and By Name List Management (3:00-3:45pm)
      i. Presentation of Recommendations
      ii. Comments from Director
      iii. Call to Vote
   
   d. Plan of Action for 7-11 (3:45-4:00pm)
      i. Chair and Co-Chair will review and revise the Improvement Schedule
      ii. Work Groups/Meetings
         1. ILC-Ops Work Group
         2. Standard Tools Work Group
         3. Prioritization and Preference Work Group
         4. Privacy/AB210 Work Group
         5. Grievance Work Group
         6. Joint HUD CoC and SCC meetings

4. Discussion Items (None)
5. Consent Items (None)
SYSTEM COORDINATION COMMITTEE
DIRECTOR’S REPORT
Julie Leadbetter, Director of System Coordination
June 13, 2018

1. Minimum Standard for HPS from last meeting
   a. New CE Access Packet temporarily sets minimum standard via workflow in the packet. There will be an opportunity to revisit as we design the HPS workflow in HMIS. Feedback from SCC was incorporated into the new version of the packet.
   b. Tools Work Group will revisit HPS minimum standards when the HPS workflow gets integrated into HMIS
   c. CE Access Packet included in meeting materials for review
   d. Diversion/HPS case study, see link below.

2. Prioritization and Preferences Work Group
   a. Met on 5-29-2018
   b. Agreed on standard definitions
   c. Developed recommendation for preference policy for matching to PSH
   d. Will continue to meet and work through other housing resources such as shelter and TH and make recommendations SCC

3. Standard Tools Work Group
   a. Met on 5-30-2018
   b. Developed a list of standard tools and forms needed and committed to meeting regularly to draft versions for recommendation
   c. Director received one request for discussion of the Disability Rights Education and Defense Fund’s report. Request has been forwarded to Chair/Co-chair for consideration on Improvement Schedule. See link for review.

4. Standards and Protocols for Transfers between HRCs
   a. Draft received
   b. Will be reviewed and input gathered from ILC-Ops before coming back to SCC

5. Coordinated Entry HUD Compliance Review
a. Revision included in packet, staff recommendation to SCC is retracted and no action is necessary from Committee
b. EveryOne Home as CoC Lead organization has authority to propose and write the CE HUD Compliance Review and determine process for joint action with HUD CoC Committee and SCC
c. Target date for completion is October 31, 2018 as suggested by SCC

6. Leadership Board Meeting 6-21 will focus on the revised EveryOne Home Plan. There will be no action or vote on SCC items in June.

7. Director of System Coordination, Chair, and Co-Chair will be meeting with HUD CoC Committee over the next month to discuss joint action, Committee authorities and tasks.
FOR CONSIDERATION BY SYSTEM COORDINATION COMMITTEE: June 13, 2018

RECOMMENDATION: Preference Policy for Matching to Permanent Supportive Housing through Coordinated Entry

DEVELOPED BY: Prioritization and Preferences Work Group including Funders Collaborative participants, 5/29/18

AUTHORITY: Approval can be carried by Director of System Coordination until presented to Leadership Board in System Manual

BACKGROUND
The Alameda County Coordinated Entry process uses a standardized assessment to determine clients’ level of vulnerability, prioritize the client relative other clients on the Countywide By Name List, and match the client to appropriate housing programs and resources. The intention is to match the most intensive resources to clients with the highest need across the County. This is especially true for Permanent Supportive Housing (PSH), which is the most resource-intensive intervention in the Housing Crisis Response System, and is targeted for the highest need clients. These recommendations aim to establish a policy for honoring additional preferences that guide matching to PSH.

Prior to the transition into Countywide Coordinated Entry, Home Stretch, the entity responsible for matching to PSH, used a combination of eligibility and preferences to make a match to PSH. These preferences were outlined through a set of 4 Priority Groups. The recommendation aims to simplify the system of preferences, make allocation decisions transparent and able to be monitored, and establish standards for determining hierarchy of preferences. The most common preferences requested in Alameda County are geographic, funder-driven preferences that if used appropriately, can honor and incentivize local investment in systemwide resources.

PURPOSE
To establish standards for determining and setting preferences for matching to Permanent Supportive Housing through Alameda County’s Coordinated Entry.

DEFINITIONS

1. **Eligibility**: Eligibility refers to the criteria that clients must meet to receive services. These criteria are set by funding source or policy makers and should be documented clearly as part of the funding, contracts, and policies. Eligibility criteria cannot violate laws such as Fair Housing or the Americans with Disabilities Act.
2. **Preferences**: Preferences refer to *criteria that, if met*, would result in clients receiving preference to receive the resource over clients who do not meet that criteria. Funders, policy makers and service providers may set preferences. Preferences may not prevent a unit of service from being filled if there is no one who fulfills the preference criteria. In cases where there are no eligible clients who also fit the preference criteria, the unit will be filled by an eligible client who does not fit the preference criteria.

   a. **Example**: Funder A funds housing for disabled people experiencing homelessness. They have an additional preference for people from Hayward. Because this is a preference, and not an eligibility, if a disabled person from Hayward cannot be located to fill the vacancy within a certain amount of time, then another disabled person would be offered the unit. However, the intention is that available unit would go to a person from Hayward first, before being offered to others who are not from Hayward.

3. **Prioritization**: Prioritization refers to the *criteria used to rank* clients on the By Name List. In Alameda County’s Coordinated Entry process, a client’s prioritization score is the main determinant of their place in the overall By Name List. Ranking is determined based on the score of the client’s Coordinated Entry Assessment relative to other clients’ scores. Prioritization is dynamic, and the ranking of clients changes as either their circumstances change, as new clients are assessed and added to the By Name List, or as others become inactive on the list. In the current matching process, once eligibility and preferences filters are considered, the person with the highest prioritization will be selected to receive the service being matched.
RECOMMENDATION: PREFERENCE POLICY FOR MATCHING TO PERMANENT SUPPORTIVE HOUSING

1. Alameda County’s Coordinated Entry process will establish and honor preferences for prioritizing and matching eligible clients to PSH.

2. Preferences must be approved jointly by the funder/entity requesting the preference and EveryOne Home, CoC Lead and documented in the Countywide Resource Registry. Preferences should be approved and documented prior to the matching process.

3. At this time, Alameda County’s Coordinated Entry process will not implement a threshold or distinct priority groups when applying preferences. The matching entity will look for eligible clients who fit the preference for a resource through the end of the prioritized list.

4. Coordinated Entry will move down the By Name List according to preferences and by using outreach attempts and timeframes for clients to respond before moving onto another client.

5. In cases where multiple funders have differing preferences for a single project or resource, preferences should be applied proportionally based on the amount of funding the funder contributed to the project.

6. The impact of preferences on matching will be evaluated on an on-going basis and revised as necessary. Thresholds may be necessary in the future to ensure the PSH is being allocated to the highest need clients in the County.
FOR CONSIDERATION BY SYSTEM COORDINATION COMMITTEE: June 13, 2018

RECOMMENDATIONS/ACTIONS: Standards for Case Conferencing and Management of the Countywide By Name List

1. Recommendation 1: Standards of Practice for Countywide Case Conferences
2. Recommendation 2: Standards for Routine List Management and Determining Status on the By Name List

DEVELOPED BY: System Coordination Committee Chair, Committee Member Sharon Leyden, EOH Director of System Coordination, EOH System Analyst, and Working Group held on 5-3-18

AUTHORITY: Director of System Coordination can carry Recommendations 1 and 2 until adoption of the next System Manual by Leadership Board.

PURPOSE:

To establish standards guiding the management of a countywide by name list and practices of countywide case conferences in order to ensure collaboration of services, updated information, and system performance. The standards contained in this set of recommendations are partial and should be understood as additions to what exists in the System Manual and will continue to be built upon through practice, improvement, and further policy and procedure development.

BACKGROUND:

By Name Lists and Case Conferencing:

A By-Name List is an up-to-date list of all people experiencing homelessness that can be segmented in various ways to allow communities to know every person experiencing homelessness by name and facilitate efficient decisions around how best to refer them to housing resources. A By-Name List serves as the centerpiece of Coordinated Entry and fosters collaboration and communication among teams involved in the process of housing people.

Case conferences using the By Name List allow teams to focus resources, actively contribute to discussions, and work in an interdependent manner with the goal of housing the highest priority households. Case conferencing is also used to gather up-to-date information in order to fairly and accurately prioritize households.
By-Name Lists and Case Conferences are key to developing actionable, real-time datasets that can help communities reach the goals of ending homelessness. A strong By-Name List can be used to plan estimations of future rates of homelessness, including inflow and refining performance targets.

Alameda County’s Countywide By Name List:
Alameda County previously had a handful of distinct By Name Lists that were used locally or for matching to a specific resource. With the move to a countywide Coordinated Entry, the County is now moving to a single Countywide By-Name List that is used to prioritize and match homeless households to services and housing resources. All literally homeless households that are assessed through the Coordinated Entry process are included on the Countywide By-Name List and ranked according to countywide prioritization policies. Prioritization of the Countywide By-Name List is dynamic; meaning a person’s position on the list may change due to their circumstances or the circumstances of others. The Countywide By Name List is centrally managed by the Continuum of Care Lead, EveryOne Home, in HMIS and governed by all applicable privacy and security policies.

Resource Zones:
Due to the geographic scale and varying needs of certain subpopulations, Alameda County’s Coordinated Entry is organized into the following Resource Zones:

<table>
<thead>
<tr>
<th>RESOURCE ZONES</th>
<th>ZONE COORDINATORS</th>
<th>GEOGRAPHY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oakland Adults</td>
<td>City of Oakland</td>
<td>Oakland, Piedmont</td>
</tr>
<tr>
<td>North County Adults</td>
<td>City of Berkeley</td>
<td>Albany, Berkeley, Emeryville</td>
</tr>
<tr>
<td>North County Families</td>
<td>City of Oakland</td>
<td>Albany, Berkeley, Emeryville, Oakland, Piedmont</td>
</tr>
<tr>
<td>Mid County Adults +</td>
<td>Abode Services</td>
<td>Alameda, San Leandro, Hayward, Castro Valley, San Lorenzo, Cherry Land,</td>
</tr>
<tr>
<td>Families</td>
<td></td>
<td>Ashland, unincorporated areas</td>
</tr>
<tr>
<td>East County Adults +</td>
<td>Abode Services</td>
<td>Dublin, Livermore, Pleasanton, and unincorporated areas east of foothills</td>
</tr>
<tr>
<td>Families</td>
<td></td>
<td></td>
</tr>
<tr>
<td>South County Adults +</td>
<td>Abode Services</td>
<td>Fremont, Newark, Union City, Sunol, and unincorporated areas around</td>
</tr>
<tr>
<td>Families</td>
<td></td>
<td>Fremont</td>
</tr>
<tr>
<td>Countywide Adults +</td>
<td>Alameda County Health Care Services</td>
<td>Countywide</td>
</tr>
<tr>
<td>Families</td>
<td>Agency, Home Stretch</td>
<td></td>
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</tbody>
</table>

Resource Zones are responsible for using segmented or filtered subsets of the Countywide By Name List to match the highest priority people to the appropriate services and housing resources. Resource Zone Coordinators focus on the homeless households on the Countywide By Name List that are
assigned to/served by their Zone, including ensuring that the information necessary to fairly and accurately prioritize the household on the list is entered, updated, and monitored in HMIS.

Resource Zone Coordinators are also responsible for coordinating the services and housing programs located in or associated with their Resource Zone, including coordination meetings and case conferences. Resource Zone Coordinators must ensure that the activities of the Resource Zone are coordinated countywide and across zones, as necessary.

**RECOMMENDATION 1: STANDARDS OF PRACTICE FOR COUNTYWIDE CASE CONFERENCES**

**Convening:**
1. Resource Zone Coordinators are responsible for ensuring that Case Conferences are held and that the necessary agencies, organizations, and service providers participate. If necessary to ensure participation, a Resource Zone Coordinator could determine or seek support from another entity with convening power or authority. Conveners may include EveryOne Home, County government agencies, City government agencies, elected officials or trusted service providers. This also may include funders making Case Conference participation required by contract.
2. Resource Zones Coordinators should convene Case Conferences, at minimum, one time per month, and best practice would be bi-weekly. Resource Zone Coordinators may convene Case Conferences focused on a specific sub-population (families, chronic homeless, etc) or resource (PSH, shelter, etc) if necessary, however sub populations and specific resource matchers should be included in the primary Case Conference for the zone. For example, domestic violence providers, veterans service providers, and countywide zone coordinator/matchers should attend the primary Case Conference, in addition to any subpopulation meeting.

**Staffing:**
1. The Case Conference should be staffed and facilitated by the Resource Zone’s Matcher or other designated staff. One person with sufficient knowledge of the system and of client cases should facilitate. Staff with data entry capability should be on hand to perform HMIS updates and document case notes in real-time.
2. The countywide Zone Coordinator and/or Matchers should be in attendance for each zone case conference in order to coordinate matching to countywide resources such as permanent supportive housing, tenancy sustaining services, etc.
3. EveryOne Home staff should be in attendance to represent countywide system performance and analysis, manage countywide by name list issues, and support cross-zone communication and coordination.

**Representing Organizations:**
1. Each Resource Zone should determine which organizations/zones should be represented in Case Conferences based on who serves the people for that zone. This may be a mix of agencies
providing shelter, TH, housing navigation, outreach, and drop-in/ancillary services, and at a minimum those agencies participating in Coordinated Entry matching.

2. Resource Zones should work with stakeholders to determine which specific staff should be present at Case Conferences. Ideal attendees are those who have in-depth knowledge about the status, needs and preferences of each person being reviewed and who are also able to make decisions regarding provision of shelter, services or housing assistance. This may be a program director, program manager, coordinator, housing specialist or case manager. There should be at least one attendee from each organization.

3. Representatives should participate in all of their agencies’ cases, specifically describing who works with each client, where each client is in the housing process, and what issues or barriers they are encountering.

Meeting Structure and Agendas:

1. Structure and agenda of the Case Conferences may change and should be responsive to the shifting needs of a region’s homeless population and available resources at any time.

2. All efforts should be made to structure agendas and provide remote technology to support effective, efficient, and broad participation of key providers and stakeholders. For example, by structuring the first section of each meeting to deal with issues of a sub population or providing a teleconference number or screen sharing.

3. Case Conference agendas should be standardized, simple, and to the point. The primary focus of case conference meetings are the individuals who are being discussed.

Suggested Best Practices

1. Identification of Persons to Review: With limited time, it is important to keep the primary focus on reviewing the most vulnerable people on the by-name list and/or those with greatest barriers to shelter and rapid placement in permanent housing.

2. Standard Agenda: A standard agenda may include the following suggested items and topics:
   a. Welcome & Introductions
   b. Key System Updates: Be sure to keep these brief and include any critical system indicators, such as average length of time for all persons to access housing.
   c. Case Conferencing: Person-specific updates and discussion.
   d. Follow Up Items: General follow-up or action items identified during the meeting.

3. Client-Level Review: Consider creating a standard set of elements to review for each person so providers can be prepared to effectively discuss cases. Below are suggested elements to review:
   a. Current status: For example: active in shelter, active unsheltered, missing and whether that status has changed since the last case conference review
   b. Person Preferences: Housing plans and next steps should be guided by the person’s preferences.
c. Critical Housing Placement Barriers: Review and problem-solve any barriers to housing placement.
d. Critical Service Barriers: Review and problem-solve any challenges to connecting persons to critical services.
e. Current Safety: To the extent possible, ensuring any unsheltered person has a relatively safe place to stay tonight and in near term.
f. Next Steps: Identify any immediate or critical action items related to the person, including roles and timelines.

4. Participating Agencies:
   a. Due to HIPAA and other privacy issues and until these issues are resolved, including police in case conferencing is not considered a best practice.

5. Sample Agenda:

North County Housing Resource Center Case Conference
2180 Milvia Street, 1st Floor, Cypress Conference Room
March 8, 2018 10-noon

Purpose:
1) Share information about people’s housing status and barriers as well as other service needs.
2) Identify people who are interested in shelter
3) Identify people who need to be prioritized for assessment

AGENDA

1. Welcome/Introductions 10:00

2. BNL Review
   a. Focused/strategic discussion on top 20 10:10
   b. Review of 21-50 11:00
   c. Quick look at 51+ (identified by agencies) 11:30
   d. Who isn’t on list that should be 11:40
   e. Confirm Outreach and Shelter Plan 11:55

3. Next Meeting: Thursday, April 12th 10-noon
RECOMMENDATION 2: STANDARDS FOR ROUTINE LIST MANAGEMENT AND DETERMINING STATUS ON THE BY NAME LIST

PURPOSE
To establish a standard practice and procedure for determining a household’s status as “active” or “inactive” on the Countywide By-Name List. The mechanics of By Name List management are highly dependent on the HMIS platform supporting the By-Name List. Changes to this standard will be reviewed when Clarity is online and can support CE assessments and list prioritization. The list status of clients who refuse referrals to housing or other services will be governed by other policies developed by the Systems Coordination Committee. Similarly, the mechanics of assessment, status, and case updates are highly depending on the HMIS platform supporting the by-name list. This issue will be reviewed regularly as Clarity HMIS is online and can support CE assessments and list prioritization.

BACKGROUND
Labelling households on the By Name List as “active” and “inactive” helps stakeholders manage workflow in the event a prioritized household is outreached but cannot be located. This proposal is based closely on protocols utilized for the federal Criteria and Benchmarks for Achieving the Goal of Ending Veteran Homelessness, with some modifications. Labeling a client or household as “inactive” on the BNL does not remove them from the list, nor does it render them ineligible for future referrals or services. Any household that has completed a Coordinated Entry Assessment is included on the Countywide By Name List. In the Clarity HMIS, there are 3 status categories used to track a client’s status: active, inactive, and housed.

RECOMMENDATIONS
1. Clients are "active" on the BNL if they are literally homeless in Alameda County.
2. Clients are determined “inactive” on the BNL only if the following events occur, are reported, and are documented in HMIS:
   a. A move out of county
   b. A move to an institutional setting where they will be residing for more than 90 days
   c. The client is deceased
   d. HRC staff or matchers have made 5 unsuccessful attempts to outreach them for service enrollment. Outreach attempts must be diligent, exhaustive, and documented in HMIS with case notes explaining each outreach effort.
   e. There is no documented contact with the client in HMIS within the last year.
3. Clients are determined “housed” on the BNL if:
   a. A client reports that they have been permanently housed and/or there is documentation in HMIS that the client has been housed.
4. If a client who has previously been labeled “inactive” is re-engaged or makes contact again with the system, they become “active” again.

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5. Clients retain their prioritization score prior to becoming inactive unless an assessment update is warranted. In the event an assessment update is warranted, it will be performed in accordance with current assessment update policies:
   a. The household has experienced a significant or life changing event with the potential to impact the household’s prioritization; and/or
   b. New and relevant information is reported by household, documented in HMIS, and/or verified by 3rd party.

6. Issues that may impact a client’s case progress or current situation but do not necessarily require an assessment update (i.e., moving from being sheltered to unsheltered) should be reflected with routine updates to existing clients in the by-name list.
SYSTEM COORDINATION COMMITTEE
ILC Update
Julie Leadbetter, Director of System Coordination
June 13, 2018

1. In the EveryOne governance structure, Implementation and Learning Communities (ILCs) are convened as work groups of System Coordination Committee. The participants are key partners in designing, implementing, evaluating, and proposing changes to system policies and procedures.
2. An ILC of Coordinated Entry operators (ILC-Ops) has been convening for almost a year.
3. For the past quarter, ILC-Ops has been convened by Alameda Care Connect in order to focus on critical contracting and training issues and while EOH staff focused on establishing the System Coordination Committee.
4. Beginning in July, EOH staff will convene one ILC as a work group of the System Coordination Committee.
5. In practice, this means that EOH staff will use the same time slot that was previously used for ILC-Ops (2nd & 4th Tuesdays) as a standard time slot for an ILC working group of SCC to elicit ideas and feedback from system operators and other stakeholders on the development of specific policies and procedures.
6. Participation in ILCs are required by certain contracts, however, participants can choose to attend specific ILC meetings according to the topic to be covered. EOH will communicate with ILC participants in advance regarding the topic to be discussed.
7. As has been the practice with SCC work groups to date, EOH will also invite other key stakeholders to the ILC depending on the topic.
8. EOH/SCC may want to switch the time from 2nd & 4th Tuesdays to 1st & 3rd Tuesdays to better sync with SCC scheduling.
9. In order to support system-wide coordination and fidelity to the standard policies of Coordinated Entry, EOH may also continue to convene a quarterly meeting similar to the previous format of ILC-Ops for countywide updates/announcements/feedback/discussion. If so, this will take place during one of the already scheduled time slots as well.
10. Zone Coordinators and HRCs will soon begin holding regional meetings and case conferences. System-wide updates and announcements should be given at the start of all regional coordination meetings. County/EOH staff should be present at regional meetings to help give these announcements/answer questions.
FOR INFORMATION TO SYSTEM COORDINATION COMMITTEE: June 13, 2018

ITEM: Coordinated Entry HUD Compliance Review

PRESENTED BY: EveryOne Home Staff

PURPOSE:

To monitor Alameda County’s Coordinated Entry, according to federally-defined responsibilities of establishing and operating a centralized or coordinated assessment system as found in Interim Rule at 24 CFR Part 578.7(a)(8) and HUD Notice CPD-17-01.

BACKGROUND

The EveryOne Home Governance Charter memorializes how stakeholders will govern the collective impact initiative to end homelessness, meet the federally-defined responsibilities of operating a HUD Continuum of Care as found in the Continuum of Care Program Rule at 24 CFR Part 578, direct the work of the backbone organization, and promote partnership and accountability among the various leadership bodies. The Charter outlines the following roles and responsibilities:

Continuum of Care and Continuum (CoC) means the group organized to carry out the responsibilities required under Interim Rule. In Alameda County the CoC is part of a collective impact effort to end homelessness. The CoC can delegate its responsibilities to a board/council, and organizations including the CoC Lead, the Collaborative Applicant, and the HMIS Lead to act on its behalf in fulfilling these responsibilities.

EveryOne Home, the organization, is the Continuum of Care Lead (CoC Lead), which is the entity designated by the CoC to coordinate its operations and planning functions. EveryOne Home, the organization, is both the CoC Lead and the backbone organization for the Collective Impact Initiative.

The HUD Continuum of Care Committee functions as the CoC Board required by the Interim Rule to act on behalf of the membership to ensure the CoC responsibilities are fulfilled. Responsibilities of the HUD CoC Committee include establishing and operating a coordinated assessment system (24 CFR Part 578.7(a)(8) and ensure compliance with HUD regulations and notices (EOH Governance Charter). The Interim Rule establishes minimum requirements that all coordinated entry processes must meet, while additional requirements have been codified under HUD CPD-17-01 Notice.
The System Coordination Committee reviews the performance and operations of the Alameda County Housing Crisis Response System and recommends changes and improvements. The System Coordination Committee convenes stakeholders to support consistent and effective operations, quality improvement, evaluation, and planning of the overall Housing Crisis Response System.

**COORDINATED ENTRY HUD COMPLIANCE REVIEW:**
As part of the responsibilities and tasks of the CoC Lead, the EveryOne Home staff will conduct a Coordinated Entry HUD Compliance Review and present findings to stakeholders as follows:

- CE HUD Compliance Review will be conducted, at minimum, annually, with the first review to be completed by 10/31/2018
- CE HUD Compliance Review will be conducted by EveryOne Home staff, consultant, or designated reviewer
- CE HUD Compliance Review will be submitted to both HUD CoC Committee and System Coordination Committee
- CE HUD Compliance Review may use the HUD published Coordinated Entry Self-Assessment Tool, or a similar format.
- CE HUD Compliance Review may be used as a Coordinated Entry implementation checklist as well as a tool to evaluate and align with overall system performance measures determined by HUD, with the goal of continually enhancing performance outcomes and competitiveness in the HUD NOFA.

**JOINT ACTION REQUIRED BETWEEN SYSTEM COORDINATION COMMITTEE AND HUD COC COMMITTEE**
- Through joint action, the System Coordination Committee and HUD CoC Committee will submit the review to Leadership Board with recommendations for improvements to the system or changes in policy as necessary.
- In the unlikely event that the Leadership Board does not want to make changes to the entire CE to ensure compliance, the HUD CoC Committee has responsibility to make adjustments to policies or practices for CoC and ESG funded entities to bring that portion of CE into HUD compliance.