

MID-WILLAMETTE HOMELESS INITIATIVE- CONTINUUM OF CARE

February 28, 2019

Policy Questions

1. Should the Marion-Polk region establish its own Continuum of Care (CoC)?
2. What organizational structure is recommended for a new CoC?
3. What changes would need to occur from current and past practices?
4. What is the change process?

Background

The Continuum of Care (CoC) has been required since 1994 by the U.S. Department of Housing and Urban Development, Office of Special Needs Assistance Programs to receive federal funds under the McKinney-Vento Homeless Assistance Act.

Until 2011, Marion and Polk counties comprised a regional Continuum of Care administered by the Mid-Willamette Valley Community Action Agency. In July 2011, members of the Mid-Valley Housing and Services Collaborative, the steering committee for the Salem/Marion/Polk CoC, voted unanimously to join the Rural Oregon Continuum of Care (ROCC), a “balance of state” CoC model, now comprised of 28 counties including Marion and Polk. The ROCC is administered by Community Action Partners of Oregon and has two designated staff.

The rationale for joining ROCC included concerns about increasing federal expectations for data collection and reporting, a hope that the Marion-Polk region would become more successful to compete for “bonus” dollars, and assurances from ROCC that the Marion-Polk region’s projects would be held harmless in the first year and would be supported to be successful in future years.

Since 2011, homelessness has become a more prominent community issue, with increasing numbers of visible homeless people and expectations from constituents that cities and counties invest in strategies that “fix the problem.” The Mid-Willamette Homeless Initiative (MWHI) Task Force discussed the region’s membership in the ROCC in 2016 and recommended that the jurisdictions review the issue. Other MWHI Task Force findings included the need for enhanced service coordination, a function that a Continuum of Care focused once more on a two-county region could address.

In 2018, the issue was placed on the MWHI coordinator’s work plan and was discussed in some depth at the October 2018 Steering Committee meeting in conjunction with a gaps analysis presentation. The purpose of today’s discussion is to consider four policy questions and review related information.

Proposed next steps are that each Steering Committee member approach its own jurisdiction leadership and carefully consider the policy questions. The Steering Committee could review the issue again in March or April, pending feedback from the governmental jurisdictions.

Policy Question 1. Should the region establish its own Continuum of Care?

Considerations include (1) funding, (2) planning and coordination, and (3) autonomy.

1. **Funding.** A review of CoC resource allocations over the past decade shows that the region initially benefited from joining ROCC, but that the proportion of funds to the Marion-Polk region has steadily declined in recent years. The dollars per homeless person in this region are

significantly below other large Oregon counties. However, should the Marion-Polk region reestablish its own CoC, there should not be the expectation that funding will grow immediately. That said, there is a potential for growth over time, including allocated and competitive grants, assuming that the reestablished CoC is well managed and views its role broadly in addressing homelessness across the region.

2. **Planning and Coordination.** When the Marion-Polk CoC was incorporated into Balance of State, the region lost its central planning entity for homelessness. Many groups attempted to fill the vacuum. These include the Mid-Willamette Homeless Initiative Task Force, task forces in Silverton and Salem, and, to an extent, the Emergency Housing Network and the Health and Housing Committee. A Marion-Polk CoC would present an opportunity to create a central entity tasked with coordinated, strategic planning. It would allow the other planning and networking entities to examine their roles and functions, vis a vis the central planning group, to reduce duplication of effort and better align resources. However, to achieve the full potential for regional planning, the entities would need to align funding beyond the CoC allocated dollars, which would require the governmental jurisdictions work more closely together. It would also require enhanced coordination of services, including greater connection with the region's Coordinated Care Organization, housing authorities, behavioral health, workforce development, public safety, education, and social services, regardless of whether an organization receives CoC or other HUD funding.
3. **Autonomy.** A Marion-Polk CoC would offer an opportunity for the region to focus on its own unique circumstances. A two-county region could make decisions to apply for competitive grants or to seek private or foundation resources without negotiating with 26 other counties. The Balance of State approach has created a situation where smaller counties have become reliant on larger county dollars for financial stability. While efforts have been made locally to create subregional coordinating structures, and while ROCC staff has made recent efforts to assist Marion County with youth homelessness, these efforts have not mitigated the fundamental barriers of participating within a 28-county region, with counties spread across the state.

Recommendation: Staff recommends that the Marion-Polk region establish its own CoC. If HUD expresses concerns about the CoC's size, Yamhill County could be considered for inclusion, if the county is willing. To affirm this recommendation, staff recommends that each affected jurisdiction adopt a resolution. If the Steering Committee agrees with this recommendation, staff will prepare a resolution template.

Policy Question 2. What organizational structure is recommended for a new CoC?

There are three HUD-identified organizational structures for CoCs. These include CoCs led by (1) a coalition, (2) a governmental entity, and (3) a nonprofit organization. HUD laid out the pros and cons for each of these structures, as follows.

1. **Coalition.** Coalitions can promote broad-based participation and buy-in by relevant organizations. However, capacity and accountability can be compromised in this model. The former Marion-Polk CoC was governed by the Mid-Valley Housing and Services Collaborative, a coalition.

2. **Government.** Governments, such as cities and counties or intergovernmental organizations, usually have greater capacity to provide staff support, hold entities accountable, and achieve grant writing and other planning tasks. Conversely, governments can be subject to political agenda and can also stifle innovation through rigid process requirements.
3. **Nonprofits.** Nonprofit organizations are very sensitive to community needs and, depending on the nonprofit organization's size and financial position, can offer staff resources. Disadvantages of this model include the burden that can be placed on a single nonprofit responsible for administering a CoC, as was experienced by Community Action in leading the former Marion-Polk CoC. A nonprofit leadership model can also result in bias, as those steering the initiative are often those who are also receiving CoC dollars.

Recommendation: Staff recommends that the jurisdictions consider an organizational structure that is government led. Because the CoC will be regional, the ideal entity to administer the CoC would be a regional entity, such as an ORS 190, with leadership representation from the two counties and selected cities on the governance board. Staff further recommends that the jurisdictions look at Lane County's governance structure for ideas about how to engage partners and align goals and resources across jurisdictions. Lane County's CoC charter is a good model for the Marion-Polk jurisdictions to consider.

Staffing is recommended at 3.0 FTE, including a staff leader position, technical position, and HMIS data entry and reporting position.

Policy Question 3. What changes would need to occur from current and past practices?

The original Marion-Polk CoC had a strong program focus. Many of the programs that are operating today in the region were generated from early CoC planning and grant awards. However, over the past decade, HUD has become much more focused on a comprehensive and strategic approach. Yet it appears that the Marion-Polk approach within the ROCC is still very program-focused. Marion-Polk representatives serving on the committee that prioritizes CoC funding also represent the organizations that receive Marion-Polk CoC funding.

Recommendation: Staff recommends that a new CoC be focused on a broader approach to homelessness. The MWHI Strategic Plan offers a springboard for this comprehensive approach, recommending increasing housing supply, expanding shelter and transitional housing resources, better coordinating education and social services, and developing strategies that respond to the characteristics of unique target populations; e.g., veterans, youth, seniors, and domestic violence victims. In doing so, the CoC would also need to forge strong connections with other coalitions that plan and coordinate around issues related to homelessness.

With this broader approach, the CoC would be perceived by the jurisdictions and partners as the legitimate, "go to" organization for systems issues related to homelessness. In this role, the CoC could serve as a neutral convener and planning coordinator for local and regional homeless strategies.

Note that the CoC would now have a laser focus on local issues, within a regional context. Even within the Marion-Polk region, different jurisdictions face unique needs and resource issues.

Policy Question 4. What is the change process?

The next opportunity to submit a CoC application for funds to HUD is in the early spring of 2020. A preliminary Memorandum of Understanding among the jurisdictions could designate which entity will develop and submit the application.

Recommendation: None yet. A conference call with HUD officials is being scheduled to confirm HUD's process steps and criteria. Oregon Housing and Community Services will also play a role in supporting the ROCC through this transition and will be consulted in the upcoming weeks.