

TX BoS CoC Plan for Serving Individuals and Families Experiencing Homelessness with Severe Service Needs

Vision

This plan is the start of the Texas Balance of State Continuum of Care's (TX BoS CoC's) dedicated efforts to increase resources for people who have severe service needs. The array of answers to the plan development survey questions and the broad geographic participation point to the uniqueness of each community in the CoC and also to the complexity of addressing homelessness both within a community and across the 215-county TX BoS CoC. This plan is intended to be structured enough to provide consistency and a minimum standard of shelter, housing, and services across the CoC yet flexible enough to allow local areas to tailor interventions that will meet their specific needs. The goal of this plan is to provide a framework for the CoC to implement strategies to reduce unsheltered homelessness and to target resources to people with severe service needs. We invite you to join us!

Participative Planning Process

Texas Homeless Network (THN), as the lead agency for the Texas Balance of State Continuum of Care (TX BoS CoC) drafted this *CoC Plan for Serving Individuals and Families Experiencing Homelessness with Severe Service Needs*. In order to facilitate a participative planning process, THN took several steps.

- Held an informational [webinar on 7/13/22](#) and invited people to give input; 63 attendees
- Published an online survey that was open from 7/20/22 through 8/12/22; 104 respondents
- Held a public consultation on the draft plan, by [webinar on 8/3/22](#); 32 attendees
- Posted a draft plan on THN's website and invited people to give feedback from 8/3-12/22; 5 respondents
- Discussed the Plan during the [CoC General Membership meeting on 8/10/22](#) by webinar; 71 attendees

All those planning opportunities were publicized on the CoC section of THN's website, on social media, by email to the CoC's "competition email list," and by email to various groups of CoC interested parties. Communications on the accessible website were provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities.

THN conducted a survey to gather CoC general members' input into the CoC Plan. Survey respondents reflect a diverse cross-section of the CoC and resemble the population of people experiencing homelessness in the CoC.

- 32% have lived experience of homelessness, 22% have lived experience of unsheltered homelessness
- 4% age 18-24, 17% age 25-34, 25% age 35-44, 25% age 45-54, 17% age 55-64, and 12% over 65
- 75% White, 24% Black or African American, and 2% White and Black or African American
- 77% Non-Hispanic/Latin(o)(a)(x), 23 % Hispanic/Latin(o)(a)(x)
- 72% women, 26% men, 1% transgender man, 1% gender non-conforming
- 88% identified as heterosexual, and 12% identified as LGBTQIA
- 8% are Veterans, 20% are living with a disability, and 19% have been arrested or incarcerated

To make the data more closely reflect the demographics of the population experiencing homelessness in the CoC, as reported in the 2022 Point In Time (PIT) Count, THN needed to receive more responses from certain demographics. Between the release of the draft plan on and the last day to accept input, THN staff publicized the opportunities to give feedback, with targeted outreach to organizations that serve people in those groups. Twenty-eight more surveys were received, and those additional respondents increased the diversity of respondents in almost every category. Ultimately, survey responses were submitted by 104 people who live and/or work in 83 BoS counties, representing geographic diversity.

CoC's Priorities in the Plan

This plan was written in response to the Supplemental Notice of Funding Opportunity (NOFO), but the priorities represent components of a strategy that are broadly applicable to a community's efforts to address unsheltered homelessness and meet the needs of people with severe service needs. These priorities reflect the most important components of the plan at this time and are woven throughout the sections of the plan. Applicants to the Supplemental NOFO must align with these priorities. For more information, please see the Supplemental NOFO Request for Proposals (RFP) that is projected to be available on Friday, August 26, 2022.

1. All Applicants must describe a community-wide commitment to the project. Applicants will be asked to identify partners in the development of the application and in the administration, oversight, and evaluation of the project. These partners should include stakeholder groups such as the Local Homeless Coalition (LHC), the Coordinated Entry Planning Entity, persons with lived experience of homelessness (PWLE), governmental agencies, and other cross-sector partners. As part of a commitment to reducing unsheltered homelessness, partners must not participate in activities that criminalize homelessness.
2. Applicants for Rural Set-Aside funds must request the maximum 20% allowed by HUD as part of the project for capacity building activities. Also, if awarded funds, grantees must use 50% or more of those capacity building funds to implement this CoC Plan at the project level.
3. All Applicants must leverage additional housing resources or healthcare resources in the operation of the project.
4. All Applicants whose projects are funded under this NOFO must have a landlord recruitment/engagement strategy.
5. All Applicants for Projects with a housing component must employ staff whose primary function is to assist individuals with their SSI/SSDI applications through the SSI/SSDI Outreach Assessment and Referral (SOAR) process.
6. All Applicants must clearly describe how their project will implement Housing First principles and practices.
7. Project-level Street Outreach activities [Street Outreach that is part of a Housing Project–Permanent Supportive Housing (PSH) or Rapid Re-Housing (RRH) or Joint Transitional Housing/Rapid Re-Housing (TH/RRH)] must connect participants to immediate access to low-barrier shelter or housing.
8. Street Outreach projects funded through Supportive Services Only (SSO) must be accountable to their communities, meaning that they have a letter of support from the Local Homeless Coalition (LHC).
9. All Street Outreach projects funded through this initiative must identify, engage, and serve people who are unsheltered and people with severe service needs, and resolve their current housing crisis for both the short term and the long term
10. Street Outreach should be strategic, culturally appropriate, coordinated, and predictable, and it should prioritize identification of the most vulnerable people. It should also strive to immediately resolve their housing crisis as part of a larger, community-wide housing strategy, with access to housing resources.
11. Street Outreach projects funded under the Rural Set-Aside must ensure that emergency lodging is truly short-term emergency lodging and not a substitute for permanent housing.
12. All Applicants must target people who are unsheltered, or with histories of unsheltered homelessness, and people with severe service needs
13. All applicants must clearly describe how persons with lived experience of homelessness (PWLE) meaningfully contributed to the project design and development of the project and how PWLE will participate in the implementation of projects funded under this Supplemental NOFO.
14. All Applicants must describe how the project will identify and serve “underserved” communities, or those communities that have not previously been served by the homeless system at the same rate that they experience homelessness in the community. Applicants will be scored on their methods for using [Culturally and Linguistically Appropriate Services \(CLAS\)](#) standards when identifying people experiencing homelessness. Also, applicants will be expected to follow CLAS standards in their projects funded under the Supplemental NOFO.

P-1. Leveraging Housing Resources

P-1a. Development of new units and creation of housing opportunities

One goal of the Supplemental NOFO is to increase the number of permanent housing units available to persons experiencing homelessness. In order to do that effectively, funds requested must be leveraged with other housing resources. The CoC Board, acting on behalf of the CoC, may establish partnerships in order to gain permanent housing units across the CoC. But the primary leveraging of housing resources will be done by Applicants within their respective project applications.

At the 7/13 webinar and in the survey for the CoC Plan, Public Housing Authorities' (PHAs') programs were the most-often cited housing resource that respondents want the CoC to partner with [15% PHA–public housing and 15% PHA–Housing Choice Vouchers (HCVs) referred through Coordinated Entry (CE)]. The CoC will model this type of partnership with the State PHA, to implement a homeless preference for the State HCV program through CE and a prioritization plan for “incremental” vouchers (Stability Vouchers) using CE.

Also, THN is structuring the leveraging of housing resources within projects as both a threshold criterion and a scored component of the local competition. Applicants that demonstrate written commitments from PHAs for at least 50% of the total units available to the project may be awarded full points on this scoring criterion. Commitments from other housing resources for at least 50% of the total units available to the project may be awarded partial points. Applicants that do not reach the 50% goal may receive partial points for this criterion. Commitment of units must be documented by a formal agreement.

P-1a. Attachment (P-1. in e-snaps)–Leveraging Housing Commitment

See the letters leveraging housing commitments attached in the e-snaps application on Screen 4A.

P-1b. Attachment (P-1.a. in e-snaps)–PHA Commitment

See the PHA commitment letters attached in the e-snaps application on Screen 4A for details.

P-1c. Landlord Recruitment

P-1c.1. Current Strategy

The CoC's strategy for landlord recruitment involves identifying high-performing communities in our service area, examining the factors in their success, and replicating those strategies at a CoC Level, to guide further development and implementation. The CoC does not have a CoC-wide strategy for landlord recruitment that covers the entire 215-county geographic area, but activity on the CoC level does exist. THN, in collaboration with TDHCA, administers the Emergency Housing Voucher (EHV) program. TDHCA made 380 vouchers available to people in 186 TX BoS CoC counties. The EHV staff at THN developed and now administer a robust landlord incentive program, conduct landlord engagement, and provide housing navigation services to program participants, all of which involve staff working with landlords and property managers.

P-1c.1.a. That strategy has worked well to house 21 households as of 7/27/22, in units across the CoC's area.

P-1c.1.b. That strategy has worked well to identify units in areas where the CoC has historically not been able to identify units. The project operated in CoC counties that were not covered by a local EHV allocation and areas where the local PHA declined the EHV vouchers. The strategy has also worked well to identify new units in areas where the CoC had been able to identify units, but not at a rate sufficient to address the need. Also, under the ESG Program–CARES Act (ESG-CV-2) funds, THN contracted with Endeavors to provide CE for counties not covered in the CoC's 17 CE regions. The project included efforts to increase the number of landlords/property owners willing to house people experiencing homelessness. The CoC can leverage relationships that have been developed and connect property owners to other projects.

P-1c.2. Both the EHV program and the ESG-CV-2 program involved new practices that the CoC implemented within the past three years. Some lessons learned include the need to provide landlord incentives and the need for both pre-lease and post-lease landlord engagement, recruitment, and retention efforts. THN plans to use the experience gained to train other projects on landlord engagement and housing navigation.

P-1c.3. The CoC plans to use data collected from surveys and to collect data from recipients and subrecipients [of EHV, ESG, and Emergency Rental Assistance-Housing Stability Services (ERA-HSS) funds] on strategies they have used and lessons they have learned to develop a CoC-wide written standard that BoS communities will be expected to follow. THN will use the data to reach out to communities that have not used landlord incentives or recruited landlords and to advocate for flexible funding or for the targeted use of landlord incentives combined with landlord recruitment. THN is especially interested in comparing data from rural communities and urban communities. And THN aims to provide training for a CoC-wide strategy for landlord recruitment when money for incentives exists and when it does not.

To update the landlord recruitment strategy, the CoC will use HMIS data from THN's EHV project that looks at the relative success when landlord incentives are used versus when they are not, as demonstrated by the rate of lease-up (or time from voucher issuance to date leased) compared to other EHV projects. The CoC will use a similar process to identify projects in the CoC that meet or exceed performance expectations for System Performance Measures (SPMs), Measure 1, "Length of Time Persons Remain Homeless" and interview those providers to determine opportunities to scale to the CoC level. The CoC will evaluate the effectiveness of strategies used under other pandemic relief funds and incorporate practices that can be scaled. Evaluation of the landlord recruitment strategy will be incorporated into the CoC's strategy to improve performance on SPMs.

A number of communities in the CoC have local landlord recruitment strategies.

- Community Healthcare partnered with their local Aging and Disability Resource Center, PHAs, and veterans resource center to hold landlord engagement events in different parts of the region that their Supportive Services for Veteran Families (SSVF) program covers. Three new landlords attended each of two events. One lesson learned is that they need to do more targeted outreach to new landlords and managers of apartment complexes in the area.
- Panhandle Community Services (PCS) held "landlord briefings" to teach landlords/property managers about the voucher program, to ensure property owners/managers have shared knowledge of the program and to dispel negative stereotypes about voucher holders. PCS also used landlord incentive payments provided by ESG-CV funds. These strategies worked well. Even after the incentive payments stopped, the landlords continued renting to the agency's voucher holders. One lesson the agency learned is that walking landlords through how to prepare their units for inspection resulted in a decreased need for re-inspections.
- Grayson County Shelters: The emergency shelter found that landlords did not like accepting "incentives," but they were open to taking "administrative fees." So, the program showed landlords how to include language about administrative fees in their leases, which encouraged more landlords to participate and to accept more tenants. The victim services shelter educated landlords on-on-one about the additional security measures survivors need. They also targeted landlords that have multiple single-family residences, where they have had the most success recruiting landlords. The strategies streamlined placing clients in housing, including people with more needs, such as elderly people and people with severe mental illness.

In order to make the most of this funding opportunity, applicants for Rural Set-Aside funds must request the maximum allowed (20% of funds requested as part of the project) for capacity building activities. Also, if awarded funds, grantees must use 50% or more of those capacity building funds to implement this CoC Plan at the project level. An example of a capacity building activity could be the development of a community-level landlord recruitment strategy.

P-2. Leveraging Healthcare Resources

Another goal of the Supplemental NOFO funds is to improve health outcomes and housing stability among people experiencing homelessness who have high vulnerabilities. In order to do that effectively, funds requested must be leveraged with healthcare resources. In the poll and survey for this plan, the highest percentage of responses about healthcare resources that the CoC should partner with were Local Mental Health Authorities (LMHAs) (26%) and substance use disorder treatment services (23%). The CoC Board, acting on behalf of the CoC, may establish partnerships in order to increase healthcare resources to help persons experiencing homelessness across the CoC, for example, with the State Health and Human Services Commission or with “Be Well, Texas.” The primary leveraging of healthcare resources, though, will be done by Applicants within their respective project applications. THN is structuring the leveraging of healthcare resources within projects as a threshold criterion and a scored component of the local competition. Applicants that demonstrate written commitments from LMHAs may be awarded full points on this scoring criterion. Commitments from any other healthcare resources may be awarded partial points. Commitment of services must be documented by a formal agreement.

In order to make the most of this funding opportunity, the CoC will require projects to use SOAR to connect people to mainstream benefits and will provide guidance and support to Applicants to structure the Supportive Services request to fund these positions. Also, Applicants for Rural Set-Aside funds must request the maximum allowed (20% of funds requested as part of the project) for capacity building activities. Also, if awarded funds, grantees must use 50% or more of those capacity building funds to implement this CoC Plan at the project level. An example of a capacity building activity is staff training to become a SOAR-trained case manager.

P-2. Attachment (P-3. in e-snaps) – Healthcare Leveraging Commitment

See the letters leveraging healthcare commitments attached in the e-snaps application on Screen 4A.

P3. Current Strategy to Identify, Shelter, and House People Experiencing Unsheltered Homelessness

P-3.a. Current Street Outreach Strategy

The CoC does not have a CoC-wide strategy to identify, shelter, and house people. But the need exists to identify and connect with households experiencing unsheltered homelessness across the CoC, especially in the most rural parts. Street outreach is a critical component in a successful CE implementation, as it is often used to identify and provide access to people who may not be served otherwise. The CoC’s strategy for street outreach involves identifying high-performing communities in the service area, examining factors in their success, and replicating those strategies at a CoC level, to guide further development and implementation.

There is broad diversity in the availability of street outreach services across communities in the CoC. And in the survey, 51% of homeless service partners said their community does not have a street outreach strategy or they are unaware of one. Also, the intended function of street outreach varies greatly, depending largely on geography and funding. Informal street outreach tends to focus on identification, but without sufficient resources to provide immediate access to temporary or permanent housing.

The intent of Street Outreach programs funded through this initiative is to identify the most vulnerable people, resolve the housing crisis for both the short term and the long term, and ensure that emergency lodging is not a substitute for permanent housing. Applicants for street outreach as a Supportive Services Only (SSO) project must clearly describe a strategy to connect participants to immediate crisis housing, including the use of CE to identify people experiencing unsheltered homelessness or people with severe service needs. Street outreach must prioritize those two groups. Street outreach should consist of formal, coordinated partnerships and must be marketed to the community and providers not administering street outreach.

The CoC lead agency will work with communities to develop a street outreach strategy that aligns with the following practices (P-3.a.1. through P-3.a.6.). In the meantime, local communities have been encouraged to design and conduct street outreach that aligns with the practices. Many of them are already doing so.

P-3.a.1. Ensure that outreach teams are coordinated

Survey responses reveal that organizations across the CoC use social services staff, mental health care providers, and/or police outreach teams to conduct street outreach, coordinating efforts across entities in any one community. Some teams reach out to people in encampments, where they are living. Others go to “soup kitchens” and cooling centers to talk with people and offer services. And some have street outreach in CE.

P-3.a.2. Ensure that outreach is frequent

Evidence-based practices include engaging people experiencing unsheltered homelessness frequently and regularly. Teams in several communities conduct street outreach daily, and others do so weekly. One survey response stated the importance of “increasing flow to the by-name list through increased outreach and increased access to Coordinated Entry.” And answers to how agencies/communities could expand their street outreach or improve its performance included reaching out more often than only on the day of the PIT Count.

P-3.a.3. Help people exit homelessness and unsheltered homelessness

Evidence-based practices include engaging people and building trust and relationships, offering people immediate access to shelter, temporary housing, or permanent housing, and enrolling people in programs quickly. The focus of street outreach under this NOFO will be connecting people with housing interventions.

P-3.a.4. Engage PEH with the highest vulnerabilities and use culturally appropriate strategies

Evidence-based practices include meeting clients where they are living and using culturally appropriate strategies. Some survey respondents agreed that going to encampments and other places not meant for human habitation led them to find people experiencing homelessness with the highest vulnerabilities, while others said they have had more success establishing trusting relationships with PEH by first meeting them at a community kitchen, public library, or other place where PEH gather and seek services. Strategies may vary but the overarching goal is to use methods that are respectful of and responsive to the needs of diverse PEH.

P-3.a.5. Use outreach teams to connect people to permanent housing

A focus of street outreach under this NOFO is to connect people to permanent housing. One group that has used local strategies based on data and performance is West Central Texas Homeless Coalition. Homeless services providers and faith communities recognized that some people experiencing homelessness were receiving hotel vouchers from multiple organizations and staying in hotels repeatedly rather than moving toward permanent housing. So, now faith communities use their funds to pay for household goods, to help people settling into permanent housing, rather than paying for hotel stays. This collaborative effort across the community has resulted in a different way to provide assistance that helps people enter permanent housing.

P-3.a.6. Hire people with lived expertise of unsheltered homelessness to conduct street outreach

The CoC recognizes the value of hiring people with lived expertise of unsheltered homelessness. The CoC is drawing on the success of peer support in mental health care settings. Through a four-year research project with Via Hope, THN is working to develop the evidence base for a peer support certification for homeless services, which could provide career options for PWLE and incentivize agencies to hire PWLE. Some agencies are already employing people with lived expertise as case managers, administrative staff, and direct services staff, but no survey respondent specifically mentioned hiring PWLE to conduct street outreach.

P-3.b. Current Strategy to Provide Immediate Access to Low-Barrier Shelter and Temporary Housing

P-3.b.1. Current strategy

The CoC's strategy for providing immediate access to low-barrier shelter and temporary housing involves identifying high-performing communities in our service area, examining the factors in their success, and replicating those strategies at a CoC Level, to guide further development and implementation.

While many survey respondents (65%) said that they provide access to immediate low-barrier shelter or temporary housing, almost all respondents identified a need for more access to immediate shelter and greater coordination with developers, local government, and landlords. The CoC's 2020 Gaps Analysis identified regional differences in shelter bed availability and the need for more emergency shelters with fewer eligibility restrictions, such as being a survivor of domestic violence. All regions have some shelter beds, but very few have beds available on a per-capita basis. And many of those beds were unoccupied on the night of the 2020 PIT Count. If bed availability (including type, number, and location) does not match the need, immediate sheltering options are not accessible. Matching availability with need is a priority for the TX BoS CoC, and it is a strategy included in the CoC Strategic Plan. And some CoC communities have responded to unsheltered homelessness by operating low-barrier shelter and temporary housing using converted hotels that people experiencing homelessness can access immediately.

P-3.b.2. How well it performs at providing low-barrier culturally appropriate access to temporary accommodations to all individuals and families experiencing unsheltered homelessness

This is an area of growth for the TX BoS CoC. Due to the large geography covered, there is wide variation in the strength of communities to provide culturally appropriate access to temporary accommodations. Several CoC communities have operated non-congregate shelter in the past, specifically during COVID-19 surges, when people were more at risk of illness and death. More communities have moved to the non-congregate model since 2020, especially as congregate settings have become less appealing to the people they are meant to serve.

The CoC has not yet evaluated the effectiveness of these approaches, but anecdotally three communities have successfully operated non-congregate shelter. First, the City of Denton sheltered people in two hotels in response to the COVID-19 pandemic. The strategy performed well at providing low-barrier, culturally appropriate access to temporary accommodations, and it created capacity in existing congregate settings. Second, New Braunfels has operated hotel rooms as non-congregate shelter for the past 18 months. The city does not have an emergency shelter building, and affordable rental housing is scarce, especially for elderly people and people with disabilities, so the hotel fills those gaps. The hotel/shelter is low-barrier not only for people entering for the first time but also for people to re-enter the program after exiting, if needed. Third, San Marcos provided non-congregate shelter in hotel rooms during a winter storm in 2021. Individuals, organizations, businesses, and government participated, and they sheltered more than 200 people within a few days. Their strategies also performed well at providing low-barrier, culturally appropriate access and in a community with no prior access for unsheltered people. Low-barrier shelter and temporary housing is a vital option to offer to persons who want to live in temporary housing before entering permanent housing.

P-3.b.3. New practices implemented over the past three years and lessons learned

New practices that were implemented over the past three years include use of non-congregate settings, prioritizing the space in those settings for people with severe service needs who might otherwise need higher-level interventions such as PSH, and connecting households to permanent interventions.

A number of lessons were learned. For instance, implementing new non-congregate shelter models without sufficient resources to move households into permanent housing leads to temporary solutions becoming

long-term and are not appealing to people experiencing homelessness. Also, pairing non-congregate solutions with supportive services is critical to success. For example, New Braunfels community members have seen the value of having a healthcare provider and a mental health care team on-site at the hotel/shelter. And because the number of people with dual diagnoses is high, organizers are working to find ways to have more substance use recovery services on-site. San Marcos leaders learned the importance of community members pitching in to help in countless ways. Having an extreme weather event can rally people around a cause, but a longer-term strategy is needed. If people are housed and stable, then resources can be spent helping people to live in stable housing rather than marshaling a huge response to shelter people in an emergency.

P-3.c. Current Strategy to Provide Immediate Access to Low-Barrier Permanent Housing

P-3.c.1.a. Current strategy, including the use of a Housing First Approach

The CoC's strategy for providing immediate access to low-barrier permanent housing has centered on aligning federal resources such as CoC Program, ESG Program, and Supportive Services for Veteran Families (SSVF) with state-level resources like the Healthy Communities Collaborative in a Housing First orientation through consultation, coordination, written standards, and policies and procedures. Also, the CoC has required projects funded under annual CoC Program NOFOs and now this Supplemental NOFO to use Housing First as a guiding philosophy at the project level. The CoC's strategy also involves identifying high-performing communities in the CoC's service area, examining the factors in their success, and replicating those strategies at a CoC level, to guide further development and implementation.

P-3.c.1.b. How the strategy is connected to permanent housing in "Leveraging Housing Resources"

The strategies that have been tried and evaluated, and the lessons learned from those implementations, have led the CoC to establish priorities in this CoC Plan. Project applicants submitting requests for funding under this NOFO must follow those priorities.

This section will be updated when the projects included in the CoC's Priority Listing are identified.

P-3.c.2. How well it performs at providing low-barrier and culturally appropriate access

The CoC's strategy has worked well at providing access to permanent housing because the written standards, policies and procedures, and consultation increase awareness and knowledge, and they set expectations that projects will provide low-barrier and culturally appropriate access, and they are regularly assessed.

Communities that have performed well at providing low-barrier and culturally appropriate access to permanent housing have used strategies such as hiring people with lived experience of homelessness and using peer support models in various aspects of the HCRS. In the poll and survey, 60% of respondents said their communities provide immediate access to low-barrier permanent housing. One respondent also said that immediate access is part of their program design, but it is not possible to fulfill when the project is operating at full capacity. Many noted challenges with a lack of housing supply, years-long waiting lists for public housing, or no public housing in their communities, all of which can hinder access. Others noted their successes, such as establishing homeless preferences in public housing, operating PSH, providing intensive case management, and collaborating with community partners to effectively use the resources that are available.

P-3.c.3. Evidence that supports the use of the CoC's current strategy

Aligning federal and state resources and developing policies and written standards are fundamental ways to make effective use of resources and ensure common expectations. Also, requiring projects to use Housing First, an evidence-based practice, increases the number of people gaining access to housing.

The CoC is also drawing from the use of peer support in mental health and substance use recovery settings to develop avenues for persons with lived expertise of homelessness to use their expertise in a variety of settings

and with a focus on housing. Through involvement in a four-year research project with Via Hope, THN is working to develop the evidence for a peer support certification for homeless services. Also, in the TX BoS CoC many communities do not have permanent housing interventions such as RRH or PSH at all, so there is an opportunity to develop permanent housing options that incorporate best practices such as peer support.

P-3.c.4. New practices implemented over the past three years and lessons learned

New practices have been implemented over the past three years. Survey respondents described using homeless preferences in PHA voucher programs; getting involved in “moving on” strategies in housing voucher programs; and promoting a range of housing options, from home repair and accessory dwelling units to zoning changes and urban infill. Attendees on 8/2 also described using case conferencing working from a by-name list.

Lessons learned from those practices include:

- All projects funded under this Supplemental NOFO and prior Annual NOFOs have required Housing First as a guiding philosophy at the applicant level, but we are learning that unless the entire community adopts a Housing First/low-barrier approach, that provider will find it increasingly difficult to maintain the level of effort and maintain relationships with public and private partners.
- Oversight of Housing First and other concepts that are rooted less in hard data and more in philosophies is challenging. The CoC leans heavily on HMIS data, for example, the number of participants exited from a project before 90 days to temporary or unsheltered locations. That percentage may indicate that the project is having difficulty building relationships with participants or with developing attractive supportive services that participants want to engage with.
- A number of CoC communities have operated low-barrier permanent housing, both RRH and PSH for years, and found varying success. Where that PSH or RRH provider plays a central role in the community’s HCRS, they find more success.
- Use what is available in your community in the most collaborative, strategic, and effective ways.
- Work to take advantage of new funding opportunities (CARES Act, EHV, ERA, HOME-ARP, and the like) that can allow for new program models, new partnerships, and significant changes.

Numerous respondents described a significant barrier to the success of new practices is the limited amount of housing available in their communities. A comment at the 7/13 webinar said, " Once a person receives CE, gets connected to RRH or PSH, then connects to Housing Navigation, there's a whole new set of barriers due to current housing market. Lack of affordable housing but also increased restrictions from property managers such as high income requirements, no flexibility on evictions or criminal history." Also, communities in the TX BoS CoC face some unique challenges to housing, such as immigration (people coming into Texas from Mexico seeking shelter and services and National Guard troops occupying housing/hotels/motels in border cities); the oil and natural gas industry (workers living in housing in areas with drilling activity); natural disasters (hurricanes and flooding along the Gulf Coast and the Louisiana border, dangerously high temperatures, and extreme cold weather); and industry (Space X, Tesla, and Amazon) whose employees move to Texas for work.

P-4. Updating the CoC’s Strategy with Data and Performance

P-4.1.a., P-4.2.a., and P-4.3.a. The CoC and Supplemental NOFO-funded projects within it will continuously review data and best practices and use that information to inform local strategies to reduce unsheltered homelessness by creating accountability to the local community for these projects and by assembling groups of local stakeholders, as well as the PWLE Workgroup, to evaluate and monitor the projects using quarterly reporting, HMIS data, feedback from partners, and other localized strategies.

Using CE and project enrollment data as well as PIT data, STELLA-P, and Longitudinal Statistical Analysis (LSA), the CoC will evaluate the trends of unsheltered homelessness at the CoC level and also at the county

level, but more important, for the specific households that are served with projects funded under this NOFO. Staff plan to watch closely the communities in the CoC with high levels of unsheltered homelessness and will adjust enrollment targets, prioritization factors, and performance benchmarks, as needed.

The CoC will hire additional technical assistance and compliance and monitoring staff for additional capacity at the CoC lead agency. The launch of projects awarded under the Rural and Unsheltered set-asides will start with a series of CoC meetings and in-depth trainings for providers around topics such as effective street outreach, Coordinated Entry, case conferencing, eligibility verifications, HUD compliance, policy and procedure workshops, and other technical assistance. The CoC will group the providers in cohorts of Unsheltered recipients and a single cohort of Rural recipients to provide peer support, development of CoC leadership, and promotion of best practices. CoC Lead agency staff, in partnership with the Applicant, Local Homeless Coalition (LHC), the local CE Planning Entity, local governmental entities, and cross-sector partners will meet to orient the community to the goals of the projects, evaluate the efficacy of these projects regularly, and correct, as needed, to ensure that the projects continue to meet the needs of the community and serve the intended participants, providing ongoing accountability.

In addition to the ongoing monitoring of project data, staff will conduct desk monitoring and client file reviews. The CoC will develop trainings for program managers and for administrators to include topics such as the COSO Internal Control Integrated Framework, 2 CFR 200, and other topics, to promote middle management stability and growth of case management and supportive services capacity over the lifetime of the projects. The CoC will post quarterly reports for all agencies awarded under this NOFO on the CoC's website, in an effort to promote a transparent culture of accountability to the communities we serve.

The CoC will continue identifying high-performing communities funded through this initiative in the CoC's service area, examining the factors in their success, and replicating those strategies at a CoC level, to guide further development and implementation of these projects and strengthening the CoC's strategy to identify shelter and house individuals experiencing unsheltered homelessness and severe service needs.

P-4.1. Street outreach

Street outreach priorities in this plan, which are also best practices, that projects must align with are:

1. Street outreach projects are accountable to the community, not only to their own project or agency.
2. Street outreach must connect people to immediate housing interventions.
3. Street outreach must identify, engage, and serve people who are unsheltered or who have histories of unsheltered homelessness and who have severe service needs.
4. Street outreach will be connected to Coordinated Entry (CE).
5. Street outreach will be connected to HMIS.

P-4.1.b. Street outreach should be connected to HMIS and, where available, CE, in order to promote prompt identification and connection to resources to resolve unsheltered homelessness. In the TX BoS CoC some communities are incorporating CE into street outreach, and a variety of partners contribute to HMIS. Project applicants will propose items 1-3 above in the project design, and the CoC will assist projects with implementing items 4 and 5, as needed.

P-4.1.c. Street outreach projects funded under this initiative should incorporate new partners and operate effectively in more communities. In communities such as Denton, Killeen, and Lubbock, homeless outreach teams are led by police departments. And in 2022, the CoC's Data Committee developed a policy around law enforcement's use of HMIS, considering potential benefits and drawbacks, and they could do that for other partners, too. Denton also includes medical personnel in street outreach, and the cross-sector partners have access to CE workflows and contribute to HMIS. Many communities also involve city government staff (parks

and recreation, code enforcement, and public health) and faith communities in their outreach activities. Applicants for street outreach are encouraged to look to peers to identify best practices, think creatively about solutions for their community, and propose street outreach activities consistent with this plan.

P-4.2.b. Providing access to low-barrier shelter and temporary accommodations

The practices proposed for funding under this NOFO, which are also best practices, are:

- Providing access to low-barrier shelter and temporary accommodations will, from the beginning, focus on helping people to obtain permanent housing.
- Emergency lodging is a temporary, short-term activity and not a long-term solution. Emergency lodging must add to the existing strategy and not fund or replace existing activities.
- Street outreach should be connected to a strategy to provide immediate access to short term accommodations.

P-4.3.b. Rapidly housing people who have histories of unsheltered homelessness in permanent housing

The practices proposed for funding under this NOFO, which are also best practices, are:

- Housing interventions must add to the current strategy and not fund or replace existing activities.
- Housing resources funded under this NOFO must target people living unsheltered, or with histories of unsheltered homelessness.
- All projects must employ Housing First.
- Housing projects are encouraged to promote and provide peer support services as a component of case management and supportive services activities.
- Housing projects under the Rural Set-Aside may request emergency lodging, but as a support to housing, not as a primary intervention.

The CoC is proposing projects that will capitalize on funding that is available and activities that are within our control to increase access to housing opportunities for people experiencing unsheltered homelessness and who have severe service needs in our rural and more suburban communities.

P-5. Identify and Prioritize Households Experiencing or with Histories of Unsheltered Homelessness

P-5.1. Strategy for ensuring resources provided under this NOFO will reduce unsheltered homelessness

Using CE and project enrollment data as well as PIT data, STELLA-P, and Longitudinal Statistical Analysis (LSA), the CoC will evaluate the trends of unsheltered homelessness at the CoC level, the county level, and for the specific households that are served with projects funded under this NOFO. Staff plan to closely watch communities with high levels of unsheltered homelessness and will adjust enrollment targets, prioritization factors, and performance benchmarks, as needed. The hope is to foster an environment of local accountability and community buy-in to evaluate whether these projects meet their intended function—to serve people that are unsheltered, or have histories of unsheltered homelessness. Over the long-term these projects will reduce levels of unsheltered homelessness in the community.

The CoC will hire additional technical assistance and compliance and monitoring staff for additional capacity at the CoC lead agency. The launch of projects awarded under the Rural and Unsheltered set-asides will start with a series of CoC meetings and in-depth trainings for providers around topics such as effective street outreach, Coordinated Entry, case conferencing, eligibility verifications, HUD compliance, policy and procedure workshops, and other technical assistance. That start-up support is recommended by HUD regional technical assistance contacts, the three HUD Field Offices in Texas, and the CoC's Community Investment Committee. The CoC will group the providers in cohorts of Unsheltered recipients and a single cohort of Rural recipients to provide peer support, development of CoC leadership, and promotion of best practices. CoC Lead agency staff, in partnership with the Applicant, Local Homeless Coalition (LHC), the local CE Planning Entity, local governmental entities, and cross-sector partners will meet to orient the community to the goals of the projects,

evaluate the efficacy of these projects regularly, and correct, as needed, to ensure that the projects continue to meet the needs of the community and serve the intended participants, providing ongoing accountability.

In addition to the ongoing monitoring of project data, staff will conduct desk monitoring and client file reviews. The CoC will develop trainings for program managers and for administrators to include topics such as the COSO Internal Control Integrated Framework, 2 CFR 200, and other topics, to promote middle management stability and growth of case management and supportive services capacity over the lifetime of the projects. The CoC will post quarterly reports for all agencies awarded under this NOFO on the CoC's website, in an effort to promote a transparent culture of accountability to the communities we serve.

P-5.2.a. How the CoC will adopt program eligibility processes that reduce unsheltered homelessness

The CoC will incentivize the targeting of unsheltered homelessness through the RFP. The CoC encourages eligibility processes that will screen-in unsheltered people. Only projects that adopt Housing First will be included in the CoC Plan. Certain eligibility criteria, such as prior shelter enrollment, familial size, or any specific diagnosis, are not allowed. Applicants must give a percentage of participants coming from unsheltered locations, and that will become a performance expectation. Applicants must communicate eligibility requirements and processes. Then the CoC will work with them to align projects with the CoC's Written Standards and the plan priorities. Eligibility processes will be evaluated regularly.

P-5.2.b. How the CoC will adopt Coordinated Entry processes that reduce unsheltered homelessness

Several changes to CE processes will occur. First, the CoC will adopt strategies that prioritize unsheltered homelessness as a primary assessment factor for the resources under this NOFO. Initially the CoC will reorganize the existing CE priority factors to emphasize the relative weight of a person sleeping outside in relation to the other existing factors. The CoC will not use assessment "scores" as the basis for enrollment into any project; rather, the score will inform the intervention type, and other factors specific to the household will determine the order of enrollment. The CoC will prioritize households in partnership with the CoC's CE Steering Committee and local CE Planning Entities, which are diverse, so prioritization is expected to evolve.

Second, by-name case conferencing will be employed to ensure fidelity to the established prioritization criteria and to ensure projects are prioritizing people living unsheltered. Third, the CoC will require street outreach funded under this initiative to participate in CE and to target that outreach to underserved communities. Fourth, in order to collect more comprehensive data on people living unsheltered, the CoC will make HMIS licenses free to groups funded under this initiative that have not previously participated in HMIS.

In addition to initial adoption of alternate prioritization processes for these projects, the CoC will evaluate the intended and actual consequences of changes to the CE process. And the CoC's PWLE Workgroup will provide input into, and ultimately approve, the CoC's prioritization of these funds. This group will hold the CoC accountable to targeting people living in unsheltered locations and people with severe service needs through regular oversight and monitoring of performance outcomes. Also, the CoC is conducting a CE evaluation to improve the efficacy of CE, and staff plan to incorporate recommendations into future plans for CE. The CoC expects that these changes will reduce unsheltered homelessness. Staff hired at the CoC lead agency and at projects through this supplemental NOFO will lead the efforts to prioritize unsheltered homelessness.

P-5.3. How the CoC will use street outreach to connect unsheltered people with housing resources

The CoC will not recommend any street outreach projects that are limited in scope or that are not accountable to the entire community. That is, project-level street outreach will not be funded as a Supportive Services Only (SSO) project. These project types will be screened during the threshold review for accountability to the larger community and must have a clearly described housing strategy. Such projects may request emergency lodging under the Rural Set-Aside but will not be funded without a clear housing strategy that must be approved by the

Local Homeless Coalition and the local Coordinated Entry Planning Entity. Points will be given to street outreach projects that leverage short-term housing resources.

P-5.4. Additional steps the CoC is taking to ensure access to housing and other community resources

P-5.4.a. Steps to increase access to identification

The CoC will promote and support the use of street outreach across the CoC to identify more people experiencing unsheltered homelessness. The CoC will also consult with communities that have developed effective ways to assist persons with obtaining identification documents that are needed to participate in services and housing. The CoC will require projects to use Culturally and Linguistically Appropriate Services (CLAS) standards in street outreach, respecting and being responsive to the specific needs of each person. And the CoC will encourage the hiring of people with lived experience of unsheltered homelessness to conduct street outreach and to serve as peer support specialists.

P-5.4.b. Providing housing navigation services

The CoC will incentivize landlord recruitment through application scoring. The CoC will promote housing navigation services by, for example, providing CoC-wide training on CoC success using housing navigation services in the EHV program to assist participants to locate housing that meets their needs and centers client choice. THN may also use peer cohorts to share best practices and successful housing navigation strategies.

P-5.4.c. Providing access to health care and other supportive services

Entities in the CoC are providing access to healthcare and other supportive services as part of CoC Program- and ESG-funded projects and are proposing to do so in project applications under this NOFO. In recent years, much evidence has shown the importance of social determinants of health, including housing, and both healthcare organizations and homeless services providers are finding ways to come together and jointly serve people experiencing homelessness. Finding funding for supportive services has been a challenge for many communities. But the CoC plans to do deeper analysis in the communities where these activities are more common, like Denton, Abilene, and Corpus Christi, to determine the best practices as well as areas for growth, and to scale these strategies to the CoC level, to the extent that is possible.

P-6. Involving Individuals with Lived Experience of Homelessness in Decision Making

P-6.1. Meaningful outreach efforts to engage people with lived experience to develop a working group

CoC lead agency staff publicized the opportunity for PWLE to serve on the workgroup in the TX BoS CoC section of THN's website, in the CoC newsletter which is sent to the CoC's email list, on social media, through staff contacts with providers, and by asking service providers and CoC general members to invite PWLE to nominate themselves. Also, staff worked with two PWLE (one THN employee and one service provider) as planners to help develop the group. Those two PWLE also co-facilitate the group, along with other staff.

P-6.2. PWLE are meaningfully and intentionally integrated into the CoC decision-making structure

The CoC has intentionally engaged PWLE in the decision-making structure for a number of years. First, in addition to the one CoC Board seat that must be filled by a PWLE, the CoC has filled other seats with PWLE every year. Those seats on the CoC's main decision-making body—that acts on behalf of the CoC and holds the authority to vote on policies—is a direct way that PWLE are integrated into decision making. Second, in the spring of 2022 the CoC Board voted to add a seat to the board to be filled by a Youth Action Board (YAB) member, reinforcing the importance of intentionally integrating youth PWLE. Third, PWLE have traditionally served on CoC Committees and on CoC governance entities in local areas (Local Homeless Coalitions and CE Planning Entities). Fourth, THN has intentionally reached out to PWLE to serve on the Independent Review Team that scores project applications in the competitive process for CoC Program funding. Fifth, a strategy in the CoC Strategic Plan is to involve more PWLE in CoC activities, including decision making. THN staff have developed a PWLE Workgroup that began meeting in August 2022.

CoC lead agency staff envision that the PWLE Workgroup will play these roles, among others that members may identify as their priorities:

- The group will guide staff on revising the CoC Strategic Plan, which has goals related to CE, HMIS, data, funding, improving access to housing and services, educating the community, and influencing policymakers.
- Like other CoC committees, the group has the authority to recommend policies to the CoC Board
- Staff will seek input and recommendations from the committee about CoC activities, such as CE processes, CE prioritization, HMIS, RRH, PSH, and how the CoC can better support local communities.
- Members will tell staff what they want to address, then work with staff to plan and evaluate changes.

Also, staff will present a proposal to fill CoC Board Seat 1 with a PWLE Workgroup member, giving PWLE true voting power on the board. And the PWLE Workgroup had the opportunity to sign a letter of support for the priorities in the CoC Plan. Members will also be invited to co-develop the CE prioritization standards for projects funded under this NOFO and in other ways to participate in their implementation/evaluation. The CoC lead agency employs PLE, who routinely give input from their experience and expertise. While hiring PWLE is a priority for THN, applicants to various funding opportunities are incentivized to find ways to give PWLE decision making power within projects. And project staff are often recruited for CoC committees and the board.

P-6.A.3. CoC encourages projects to involve PLE of unsheltered homelessness in the delivery of services

The CoC incentivizes projects to engage PWLE by awarding points in the scoring for CoC Program funding, using criteria such as:

- The organization solicits feedback through truly anonymous satisfaction surveys.
- The organization hosts regular focus groups and/or listening sessions with participants.
- The organization has a standing consumer advisory committee.
- A current or former participant(s), or someone with current or past lived experience of homelessness, sits on the Board of Directors or other equivalent policymaking entity.
- The organization employs current or former participants in the project.

Staff also regularly ask about PWLE involvement when discussing ongoing project development and performance improvement. And staff encourage providers to hire PWLE– to take advantage of their expertise from going through the HCRS and their valuable role as peer support. On the CoC level, the lead agency models involving persons with lived experience of unsheltered homelessness as agency employees and on the agency's board, the CoC Board, and CoC committees. Also, THN, two agencies in the CoC, and cohorts of peers are participating in a research study on peer support in non-traditional settings, like homeless services. Led by Via Hope, the project may result in developing a peer support specialist certification in homeless services, which could enhance peers' skills and create new career opportunities in homeless services.

P-6a.Attachment (P-9c. in e-snaps) Lived Experience Support Letter

See the letter signed by PWLE Workgroup members that is attached in the e-snaps application on Screen 4A.

P-7. Supporting Underserved Communities and Supporting Equitable Community Development

P-7.1. Current strategy to identify populations

The CoC's strategy to identify populations in the CoC's geographic area that have not been served by the homeless system at the same rate they are experiencing homelessness revolves around assessment and planning.

- The CoC's 2020 Gaps Analysis revealed important data about racial groups disproportionately represented in the homeless population. Strategies addressing recommendations in the gaps analysis were included in the CoC Strategic Plan and Action Plan. For example, lead agency staff are identifying the five BoS counties with the highest racial disparities and will address the disparities using research-backed approaches and monitor progress. Also, the lead agency anticipates updating the gaps analysis to capture newer data.

- The CoC lead agency has contracted with a consultant to conduct an evaluation of Coordinated Entry. That evaluation will include analyzing CE data in HMIS. That data will then be compared to PIT Count data and Census data on the CoC’s general population to identify populations underserved by the HCRS.
- THN is seeking a consultant to develop a strategic plan that includes efforts to further racial equity within THN and eventually within the CoC.
- As with other topics in this CoC Plan, the CoC’s strategy for identifying underserved populations involves working with communities in our service area, examining the factors in their success, and replicating those strategies at a CoC level, to guide further development and implementation.

P-7.2. How underserved communities in their geographic area interact with the homeless system

Description: In the TX BoS CoC, underserved populations vary from community to community. Survey respondents gave details about the underserved community in their cities and towns: youth ages 13 to 24; Black, Indigenous, and other People of Color (BIPOC); people who identify as LGBTQ; people with dual diagnoses (mental health diagnosis and substance use disorder diagnosis); people living in poverty; people living with disabilities; formerly incarcerated people; migrant farm workers; people living in tent cities; people who cannot access primary health care; people who earn low wages; and people without access to transportation.

Interaction: Respondents also described how underserved communities interact with the homeless system, and those also varied from area to area. The responses ranged from “they do not, unless outreach is provided,” to “mostly through soup kitchens and the police or EMS” and from “We serve as [a] resource center to connect our unserved communities to the homeless system” to “Coordinated Entry Access Points.” Anecdotally, many people in our CoC are experiencing unsheltered homelessness and are not being identified.

P-7.3. Current strategy to provide outreach, engagement, and housing interventions

Since underserved groups have different strengths, needs, and barriers across various communities, strategies to provide outreach, engagement, housing interventions, and supportive services to assist them also vary. THN received more than thirty responses to a question about how current strategies could be improved to better assist underserved populations. Some examples include:

- “Engagement through lived experience boards, having multiple opportunities to provide feedback without fear of retribution, developing leadership material for lived experience boards”
- “Reduce barriers such as IDs, background checks and offer more locations as well as transportation for homeless to shelters and cooling/warming centers. Provide outreach within communities for instance - phone, computer - some access point in high traffic areas for homeless to use when in need or distress.”
- “write letters, e-mail, call, or visit public officials at the city, county, state and federal levels asking what they are doing about homelessness and/or mentioning”

The lead agency will require applicants for funding under this initiative to describe how the project will identify and serve “underserved” communities. Applicants will be scored on their methods for using [Culturally and Linguistically Appropriate Services \(CLAS\)](#) when identifying people experiencing homelessness who are not currently being served. Also, awardees will be expected to follow CLAS standards in their work in the projects. THN will work with service providers, the PWLE Workgroup, and other stakeholders to develop a CoC-wide strategy that provides minimum standards and consistency across the CoC as well as flexibility so communities can tailor it to their specific needs.

Next Steps: Once this plan is approved by the PWLE Workgroup and CoC Board, the next steps are to incorporate it into the CoC Strategic Plan and 2023 Action Plan. The Strategic Plan and Action Plans are developed by THN staff with input from CoC general members and are overseen by the Strategic Planning Committee and PWLE Workgroup. Implementation of this plan will begin with the Notice of Conditional Award by HUD, and projects awarded under this NOFO should plan to start operations in 2023.