

**COC FL-511: ESCAMBIA AND SANTA ROSA COUNTIES
GOVERNANCE CHARTER
(COVER PAGE TO COME)**

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I. INTRODUCTION AND PURPOSE

The U.S. Department of Housing and Urban Development (HUD) requires communities that receive funds under the Continuum of Care Program (“CoC Program”) to carry out the responsibilities listed in the CoC Program Interim Rule located at [24 CFR Part 578](#) in the code of federal regulations. The Interim Rule defines a CoC as “the group organized to carry out the responsibilities under this part and that is composed of representatives of organizations, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.” The interim rule also establishes three major duties for which the CoC is responsible: to operate the CoC, to designate a Homeless Management Information System (HMIS) for the CoC, and to plan for the CoC. HUD has designated the FL-511 CoC as the CoC covering the geographic region of Escambia and Santa Rosa counties.

This Governance Charter serves as a comprehensive guide, detailing how the CoC for Escambia and Santa Rosa counties fulfills its responsibilities through a structure that is responsive to the local needs of people experiencing homelessness. The Charter outlines how stakeholders will govern the collective impact initiative to end homelessness, meet federally defined responsibilities of operating a HUD Continuum of Care as found in the CoC Program Interim Rule, direct the work of the CoC Lead Agency, and promote partnership and accountability among the various leadership bodies.

Appendix B provides a comprehensive listing of leadership bodies' roles and responsibilities. The Governance Charter, a cornerstone of our collective effort, will be reviewed annually and adopted by the CoC membership. This commitment to regular review and improvement ensures that our initiative to end homelessness remains responsive and effective.

II. MISSION AND GUIDING PRINCIPLES

The FL-511 CoC envisions a community where no one is experiencing homelessness. The CoC works as a collective body to ensure everyone has a safe, stable, and affordable place to live. The CoC holds each other accountable by committing to guiding principles.

All relevant organizations and individuals participating in the CoC uphold collective attributes and values.

- **Inclusive:** People with lived experience are meaningfully and intentionally included in the decision-making structure. Robust representation of all subpopulations (e.g., veterans, unsheltered, disabling conditions, etc.) is critical to informed decision-making.
- **Solution-Focused:** The CoC engages in solution-focused conversations and decision-making to address limited resources, systemic challenges, and ever-changing needs.

- **Geographically Diverse:** The CoC includes diverse representation from Escambia and Santa Rosa counties.
- **Engaged and Committed:** CoC members' engagement and commitment is evidenced by active participation in meetings, committees, work groups, and volunteerism.
- **Data-Driven:** The CoC prioritizes the collection and use of data to provide objective, precise, and effective solutions.
- **Representative:** The CoC includes members representing its entire geographic area, including Escambia and Santa Rosa counties.
- **Objective:** Decision-making includes a wide range of members representing various sectors. The CoC will ensure that decisions consider the entire system's response instead of reflecting any special interests.

III. STRUCTURE

The FL-511 CoC utilizes five main entities to carry out the work of the CoC as outlined in the CoC Program Interim Rule.

3.1. COC MEMBERSHIP

The CoC membership is a collaborative network of organizations and stakeholders working together to address homelessness within Escambia and Santa Rosa counties. CoC members develop and implement strategies to prevent and end homelessness.

3.2. LEADERSHIP COUNCIL

The Leadership Council is the CoC's governance board and a formal decision-making body responsible for overseeing and guiding its direction. It is crucial to the CoC's structure, providing leadership, strategic direction, and accountability to ensure effective coordination and delivery of services to prevent and end homelessness.

3.3. LEAD AGENCY (COLLABORATIVE APPLICANT)

The CoC Lead Agency is the administrative backbone of the CoC. It is the primary organization responsible for planning, managing, and coordinating the CoC's activities. The Lead Agency plays a central role in ensuring that the CoC operates effectively and efficiently in its mission to prevent and end homelessness. As the collaborative applicant for the CoC, the Lead Agency manages the application process for HUD CoC Program funding and other federal, state, and local funding sources. This includes preparing and submitting the annual CoC funding application.

3.4. HMIS LEAD

The Homeless Management Information System (HMIS) Lead is the entity responsible for the administration and management of the CoC's HMIS. The HMIS is a locally administered, electronic data collection system that stores longitudinal client-level information about individuals and families who access homeless services. The role of the HMIS Lead is crucial for ensuring data quality, security, and compliance with federal and local requirements.

3.5. COMMITTEES AND WORKGROUPS

Committees and workgroups are vital to a comprehensive and collaborative community approach to address homelessness. Committees and workgroups offer the opportunity for CoC members to engage by bringing their expertise, innovative solutions, and unique insights. The committees and workgroups also provide valuable input and recommendations to the Leadership Council.

IV. COC MEMBERSHIP

CoC general membership is open to any individual or organization committed to preventing and ending homelessness. Individuals or organizations must live, work, or service residents inside the CoC's geographic area of Escambia and Santa Rosa counties. This includes public and private entities, individuals with lived experience, community advocates, for-profits and nonprofits, and governmental entities.

4.1. TYPES OF MEMBERSHIP

CoC general membership is open to any individual or organization living, working, or serving residents inside the CoC's geographic area of Escambia and Santa Rosa counties. This includes public and private entities, for-profits and nonprofits, and governmental entities.

The CoC believes that including people with lived experience of homelessness in the general membership makes the CoC's work more responsive, effective, and equitable. All people with lived experience are invited to be members and are afforded all the benefits of CoC membership.

There are two types of CoC membership: Organization and Individual.

- **Organization**

To become a member of the CoC, the agency/organization must be located or provide services in the CoC's geographical area, have attended at least one CoC membership meeting, and complete a membership application. Organizations include faith-based organizations, nonprofits, government partners, and for-profit partners. Each application will be reviewed and confirmed by the CoC Lead Agency. The CoC Lead Agency will make the roster available to the Leadership Council. At the time of membership application, the organization will select one primary voting member and one alternate if they are unable to vote. If the voting member is unable to be routinely involved in the CoC, the organization should provide the CoC Lead Agency with a new voting member. Organizations may update their voting member or alternate at any time by notifying the CoC Lead Agency. If the individual completing the application on behalf of the organization is not an executive leader or owner of the organization, the CoC Lead Agency will confirm with the organization's leadership (e.g., CEO, Board, or Owner) that it approves the voting member listed on the application. This includes individuals signing up to represent membership associations or affiliates, which may not fall under a typical organizational structure.

- **Individual**

To become an individual member of the CoC, the individual must live or work in the CoC’s geographical area, have attended at least one CoC membership meeting, and complete a membership application.

There are two types of individual membership: voting and non-voting.

Individual Voting Member: A voting member is an individual who is not currently working for or representing an organization that is currently a CoC member. An individual voting member has one vote.

Individual Non-Voting Member: A non-voting member is an individual who wishes to participate as a member of the CoC but cannot cast a vote because they work for or represent an organization that is currently a CoC member.

Beginning July 1, 2025, the CoC will charge the annual membership fees listed below to offset the cost of administering membership and membership meetings. Fees are subject to change by Leadership Council vote, and current fee amounts will be listed on the membership application.

Membership Type	Annual Fee (due by 6/30 annually)
Individual (Voting and Non-Voting)*	\$10
Nonprofit Partner (no employees)	\$25
Nonprofit Partner (1-24 employees)	\$50
Nonprofit Partner (25 or more employees)	\$100
For-Profit Partner (1-24 employees)	\$100
For-Profit Partner (25 or more employees)	\$300
Government Entities	\$100

Fees

**People currently experiencing homelessness will not be charged a fee.*

Fees shall not interfere with any individual or organization’s ability to participate in membership. Any individual or organization can request a fee waiver on their application. Requests for fee waivers are need-based and will be considered by the CoC Lead Agency, Leadership Council, or their designated committee.

Membership Benefits

The following membership benefits apply to all CoC members in good standing:

- Eligible members can apply for CoC funding, including participation in HUD Notice of Funding Opportunities specific to the CoC Program and any Requests for Proposals issued by the collaborative applicant.
- Members may request letters of support necessary for their grant applications from the collaborative applicant. Requests do not guarantee automatic acceptance.
- Eligible voting members may participate in voting as outlined in Section 4.5.
- Members receive up-to-date information from the CoC on meetings, events, volunteer opportunities, and funding opportunities.
- Members may participate in CoC committees.
- Members actively guide the community's strategic plan to prevent and end homelessness.

Membership Denial

While the CoC strives to be inclusive, there may be instances when membership is denied. The Leadership Council will address membership denials.

Resignation. Any CoC member may withdraw their membership at any time by giving written notice to the CoC Lead Agency.

Removal and Denial. CoC membership applications may be denied or a current CoC member removed from the CoC membership for violations of the of the policies and procedures of this CoC, or cause, including but not limited to:

- Fraud
- Failure to disclose a conflict of interest
- Intentionally providing false information on the membership application
- Failure to maintain good standing as a CoC member
- Failure to maintain confidentiality
- Failure to uphold the guiding principles of the CoC

The Leadership Council will be responsible for developing, maintaining, and enforcing the procedures for resignation, removal, and denial.

4.2. ROLES AND RESPONSIBILITIES

The Governance Charter assigns the following roles and responsibilities to the Continuum of Care Membership:

1. Hold a minimum of two meetings per year of the full membership, one of which will be the Annual Meeting.
2. Extend an open public invitation for new members to join. Ensure that an updated membership roster is maintained.
3. Adopt and follow the written process for selecting elected members to the Leadership Council.
4. Hold annual elections to fill vacant seats on the Leadership Council.

5. Update the Leadership Council selection policies no less than every five years.
6. Ratify the initial Governance Charter and approve the annual updates as developed and recommended by the Leadership Council or their designated committee.
7. Contribute input and strategic ideas to the Leadership Council and participate in CoC committees and workgroups.
8. Utilize the Governance Charter to delegate certain responsibilities of the CoC to the Collaborative Applicant, HMIS Lead, Leadership Council, and CoC committees/workgroups to meet the requirements of operating a CoC, operating an HMIS, and CoC planning.

4.3. RECRUITMENT AND OUTREACH

The CoC invites new members to join at any time during the year. The CoC will publish and appropriately disseminate an open invitation broadly available through public notice at least annually for persons within the CoC geographic area to join as new CoC general members. The CoC will document recruitment efforts. Interested individuals and organizations can apply for membership by completing the online application available at <https://openingdoorsnwfl.org/getinvolved/membership>. To ensure robust outreach and recruitment of people most impacted by homelessness, membership application information will be made available at each membership meeting and intentionally advertised at locations where people experiencing homelessness are receiving services.

The CoC will identify and address membership gaps in essential sectors from key providers or other vital stakeholders. The CoC will recruit members to ensure that it meets all membership requirements set forth in this governance charter, including representation of certain populations and certain organizations. The CoC strives for a diverse body of members. In alignment with 24 CFR Part 578.5, the CoC will continue outreach to recruit new members that include people experiencing homelessness, formerly homeless or at risk of homelessness, nonprofit homeless assistance providers (whether or not recipients of HUD funding), and employment providers, domestic violence and sexual assault service providers, faith-based organizations, governments, funders, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, substance use service providers, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans, and individual community members.

4.4. MEMBERSHIP MEETINGS

CoC General Membership meetings shall be held at least twice a year, with one meeting specified as the CoC Annual Meeting at which Leadership Council elections will be held. CoC General Membership Meetings are in addition to ad hoc work group meetings and committee meetings, which may occur more frequently.

CoC General Membership meetings are open to any interested party regardless of membership status. Meetings will be noticed in advance through the CoC membership list and through posting on the website of the CoC Lead Agency/Collaborative Applicant. This notice will include the meeting's date, time, and location. Meeting agendas will be posted online at a specified location and emailed to members at least two weeks in advance. In addition, public notice will be provided

for the annual CoC membership meeting at which Leadership Council members are elected. Should the State of Florida Sunshine Law requirements be deemed relevant to any meeting, the CoC and Leadership Council will comply with the requirements of the Sunshine Law.

All CoC meetings are open to the public, whether or not membership has been established.

4.5. VOTING, QUORUM, AND GOOD STANDING

To the greatest extent possible, those items that need to be voted on will be indicated as such on the meeting's agenda and shared at least two weeks in advance of the meeting. The Lead Agency will administer and maintain records associated with CoC membership votes. Membership must be established and approved two weeks before voting. Each eligible voting member is permitted one vote, whether an organization or individual. No person at the CoC membership meeting may vote twice as an organizational representative and an individual member. Only eligible voting members are permitted to vote. Other individuals or organizations in attendance may not cast a vote if membership has not been approved.

To be considered an active member in good standing, the member must meet these thresholds:

1. Participation by the voting member or designated alternate in at least 75% of CoC General Membership meetings. For organizational members, only the voting member or alternate that has been established in advance on the membership application is counted to determine good standing.
2. Membership fees must be paid according to the fee schedule and current two weeks before the meeting.
3. Members of an HMIS-covered homeless organization or comparable database must participate in data collection in compliance with the Data Quality Monitoring Plan for the CoC.

There may be times when active members are unable to meet the thresholds listed above. Prior to an active member losing their good standing, the Leadership Council or their designated committee will determine the extenuating circumstances on a case-by-case basis.

Proxies

Any voting Individual member in good standing can designate a proxy to attend meetings and vote. Individual members may designate any other individual member in good standing, not affiliated with an organization holding a membership, to vote on their behalf. Organizations designate an alternate voting member at the time of their application for membership. No additional proxy is allowed. Organizations may update their alternate voting member following the process outlined in Section 4.1. Individual proxies or voting/alternate members of an organization must be established two weeks prior to the meeting in which a vote occurs.

Quorum

A quorum is defined as fifty percent of active voting members for in-person CoC membership meetings. If a quorum can be established, a majority of all those present and eligible to vote is necessary for any resolution or vote to pass. In the absence of a quorum, in-person voting will be

deferred to the electronic voting process described herein. On a case-by-case basis, the Leadership Council may determine that a resolution needs a higher percentage of votes because of the substantial impact of the resolution. The membership will be notified according to the regular notification process if this is the case.

An email vote may be used for time-sensitive or critical votes. At the direction of the Leadership Council, electronic votes may be initiated by the Lead Agency. A quorum shall be reached for electronic voting when votes have been received from at least fifty percent of active voting members. Electronic voting will be closed at a predetermined deadline after reaching a quorum. Upon closure of voting, a simple majority of votes received in favor of a given voting item will constitute passage of that item.

Full membership votes shall be taken for items including, but not limited to, the following:

- Initial vote to ratify the updated CoC Governance Charter
- Periodic votes to elect Leadership Council members

Adopt and follow a written process to select a board to act on behalf of the CoC. The process must be reviewed, updated, and approved by the Continuum at least once every 5 years.

All voting members shall have the right to recuse themselves from voting on the matter without providing an excuse. A member must recuse themselves from voting when a conflict of interest arises. For example, a voting member, whether an individual or organization, may not take part in votes where that individual or organization would potentially benefit from the decision, financially or otherwise.

V. LEADERSHIP COUNCIL

The Leadership Council serves as a strategic governing body at the behest of the general membership, ensuring that the CoC is fulfilling its responsibilities and working collectively to prevent and end homelessness. The Leadership Council is designated as the CoC Governance Board as outlined in 24 CFR Part 578.

5.1. QUALIFICATIONS AND RESPONSIBILITIES

All members of the CoC Leadership Council shall affirm a professional interest in and personal commitment to preventing and ending homelessness within the geographic region of FL-511.

Each Leadership Council Member must also:

1. Be a CoC member in good standing or be affiliated with an organization in good standing.
2. Complete and sign a conflict-of-interest disclosure statement each year and upon any change in affiliation.
3. Collaborate in good faith with other members to work toward the CoC mission to address homelessness.
4. Abide by the Governance Charter, policies, and procedures.

5. Serve actively on at least one committee per year.
6. If representing a certain sector of homeless services, solicit input from others in that sector who are not on the Council to ensure their voices are represented.
7. Attend and participate actively in meetings.
8. Participate in the CoC's activities, such as the Point-in-Time Count, strategic planning, advocacy and public education efforts, and project and system performance reviews.

The Leadership Council will:

1. Set overall strategic direction and priorities for the homelessness response, including overseeing and approving the allocation of CoC funds to align with these priorities.
2. Determine desired outcomes for people experiencing homelessness, with specific performance measures and benchmarks that consider the needs of subpopulations. Establish ongoing monitoring and oversight consistent with funder guidelines.
3. Review the CoC's system performance measures and develop strategies to improve performance.
4. Expand partnerships across industries to address homelessness in the CoC effectively, including local government coordination in planning and leveraging funding.
5. Partner with local government to promote and align community-wide efforts and solutions to address homelessness.
6. Broadly articulate the CoC's strategic plan and collaborative efforts to raise awareness and increase strategic collaboration.
7. Revise the Governance Charter as needed and present it annually to the CoC full membership.
8. Set strategic priorities for funding, review performance by funded agencies, and track the impact of funds spent. Funding streams include:
 - a. HUD CoC Program Funding
 - b. State of Florida homeless grants through DCF (TANF, ESG, Challenge, and Staffing)
 - c. Other outside funding sources meant to go directly to CoC activities and programs
9. Provide oversight to ensure the Lead Agency and funded agencies are applying for available funding through HUD's annual Notice of Funding Opportunity (NOFO) for CoCs, State of Florida homeless grants, and other special or local funding opportunities that align with the CoC's strategic plan.
10. Provide high-level oversight of the other CoC bodies, including the membership, Collaborative Applicant, Lead Agency, HMIS Lead, and committees and workgroups.
11. Designate entities to operationalize CoC responsibilities, including but not limited to the Collaborative Applicant (i.e., Lead Agency), HMIS Lead, and committees and workgroups.
12. Review the performance of the designated entities annually based on the roles and responsibilities outlined in this Charter.

5.2. COMPOSITION

The Leadership Council will consist of no fewer than 15 members and no more than 28 members who collectively represent the CoC membership. The Leadership Council will include diverse representation from community members and sectors, including, but not limited to, individuals with lived experience of homelessness, service providers, the business community, funders, faith communities, housing providers, and representatives of government.

Because the Leadership Council serves at the behest of the CoC, the majority of Council members will be elected by the full membership at the Annual meeting. In addition to elected members, certain members will be appointed. The Leadership Council is intended to be balanced between Escambia and Santa Rosa counties.

There are two types of Leadership Council members:

1. Appointed members serve on the Council by virtue of their office or experience.
2. Elected members must be voted in by the full CoC membership.

Appointed and elected members have equal participation, voting, and decision-making responsibilities. All Leadership Council members are eligible to vote at Leadership Council meetings, even if they are not their organization's designated voting CoC member.

APPOINTED MEMBERS (7)		
Representing	Seats	Type
Escambia County	1	Appointed by Escambia County
Santa Rosa County	1	Appointed by Santa Rosa County
City of Pensacola	1	Appointed by City of Pensacola
City of Milton	1	Appointed by the City of Milton
Youth Action Board Member	1	Appointed by Youth Action Board
Federally Qualified Health Center	1	Appointed by FQHC
United Way of West Florida	1	Appointed by United Way
Lead Agency Executive Director	1	Appointed, Ex-officio (non-voting)
ELECTED MEMBERS (No more than 21)		
Representing	Seats	Type
Person with lived experience	2	Elected
Affordable housing developer/provider	1	Elected
Behavioral Health Provider (Must receive SAMH funding)	1	Elected
Healthcare system or provider	1	Elected
Homeless service provider	3	Elected
Law enforcement	1	Elected
Public Housing Authority	1	Elected

Organization specific to serving or representing persons with disabilities	1	Elected
Organization dedicated to advancing equity in marginalized communities	1	Elected
School system/liaison	1	Elected
Workforce Development	1	Elected
Victim Service Provider	1	Elected
Faith-Based Community Representative	1	Elected
Business Community Representative	1	Elected
Veteran Service Provider	1	Elected
General seats*	3	Elected

**General seats are open to any relevant individual or organization, including nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons to the extent these groups are represented within the geographic area and are available to participate.*

Change in Employment

To ensure full representation of a broad range of community organizations and specific populations, Council members are required to inform the Chair within ten business days if they no longer work for the organization they represent or if their work circumstances are significantly altered. Notification shall be made in writing. The Leadership Council or its designated committee will then initiate the nominating process according to Section 5.3.

5.3. NOMINATIONS

Members in good standing may apply to become a Leadership Council member by submitting an application to the Leadership Council’s designated committee. The designated committee presents the eligible applicants to the membership. Elected Leadership Council seats can only be filled by a general membership vote.

For the first slate of Leadership Council members, the ad-hoc Governance Committee will develop a nominating committee to carry out the initial application and election process to create the initial Leadership Council.

5.4. TERMS

Terms shall be two (2) years. **Elected members** may serve no more than three consecutive terms, not to exceed six (6) years. Elected members are eligible to serve again after two years. **Appointed**

members may continue to serve subsequent terms without limitation, except that they must continue to hold their position or office at the time of their appointment.

Initial appointments and elections will be staggered to include some three (3) year terms to ensure continuous quorum. Elected members serving an initial three-year term will only be eligible to serve one subsequent two-year term.

5.5. OFFICERS

The Leadership Council's elected officers shall be the Chair, Vice Chair, and Secretary. The officers may not be affiliated with a CoC-funded organization at any time. Officers shall be nominated by the Leadership Council or its designated committee, and elected by a majority vote of the Leadership Council members who are present and voting.

Terms

Officers of the Leadership Council shall serve a term of only two (2) years. The term of office shall begin on the date of the election. Officers may be existing or new Leadership Council members.

Duties of Officers

Leadership Council Chair

The Leadership Council Chair shall preside at all Leadership Council meetings, represent the Leadership Council and CoC in public capacities, and work with the Lead Agency to develop the meeting agendas.

Leadership Council Vice Chair

The Leadership Council Vice Chair shall fulfill the functions of the Chair when the Chair is unavailable.

Leadership Council Secretary

The Leadership Council Secretary shall keep accurate records of the proceedings of all CoC Board meetings or designate another person to do so at each meeting. Such records will include the names of those in attendance and minutes.

5.6. VOTING, QUORUM, AND GOOD STANDING

Council meetings will happen approximately monthly and no fewer than six (6) times per year. Only Council members or a proxy designated by the Council member may vote at a Council meeting. Collaborative Applicant staff will provide public notice of meeting times and locations. Except for Executive Committee meetings, all Leadership Council meetings are open to the public.

Voting and Quorum

A quorum is established when at least 50% +1 of Council members are in attendance. Meetings will be held in person, and a virtual option will be available.

Good Standing

Members are expected to attend 75% of the meetings annually, except with an excused “good cause” absence approved by the Chair. Council members shall notify the Chair in advance of known absences. Missing three consecutive meetings is considered cause for removal.

Resignation and Removal

Resignation. Any member may resign at any time by giving written notice to the Chair. Any such resignations shall take effect at the time specified within the written notice.

Removal. Council members may be dismissed from the Council for violations of the conflict of interest policy, other violations of the policies and procedures of this CoC, or cause, including but not limited to:

- Missing three or more consecutive Council meetings
- Fraud
- Failure to maintain good standing as a CoC member
- Failure to maintain confidentiality
- Failure to uphold the guiding principles of the CoC

When any of these reasons for removal occur, the following processes will be used for removal.

Appointed Seats. An appointed Leadership Council member may be removed from their seat for the reasons outlined above by any of the following methods:

- By the appointing entity, in the same manner as the appointment was made or
- By a majority vote of the members present at a Council meeting so long as a quorum has been established.

Upon removal, the appointing entity will appoint a new member.

Elected Seats. A Leadership Council member elected by the CoC membership may be removed from their seat for the reasons outlined above by a majority vote of the members present at a Council meeting so long as a quorum has been established. Vacancies shall be filled by the Nominating Committee and elected by the membership.

5.7. CONFLICTS OF INTEREST

Council members must abide by the Conflict of Interest guidelines laid out in the [CoC Program Interim Rule](#). No Council member may influence decisions concerning the award of a grant or other financial benefits to the organization that the member represents or to them as individuals. Therefore, any individual participating in or influencing decision-making must identify actual or perceived conflicts of interest as they arise and comply with the letter and spirit of this policy. Disclosure should occur as soon as possible before discussing any such issue. Disclosures shall be recorded in the meeting minutes. Individuals with a conflict of interest should abstain from discussion and voting on any issue in which they may have a conflict.

Council members will not be permitted to participate in a discussion or vote until an annual signed COI statement is on file with the Lead Agency. The Leadership Council and its committees and workgroups shall comply with federal, state, and local laws and regulations. The business of the CoC shall be conducted to avoid all conflicts of interest. The program standards for conflicts of interest described by the U.S. Department of Housing and Urban Development's Interim Rule for the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH Act) are found at 24 CFR Part 578.95 (available at www.hudexchange.info).

Council members participating in scoring funding applications cannot be employees, agents, consultants, board members, or married to someone employed by any organization, non-profit, or government department that is a recipient or sub-recipient of Continuum of Care Funding.

VI. LEAD AGENCY

The collaborative applicant is the organization designated by the CoC to submit the required CoC application for all projects selected for funding and apply for CoC planning funds through HUD's published funding opportunities under the CoC Program. The term Lead Agency describes the agency designated to be the collaborative applicant and the primary organization responsible for planning, managing, and coordinating the CoC's activities. The Lead Agency plays a central role in ensuring that the CoC operates effectively and efficiently in its mission to prevent and end homelessness. The current designated collaborative applicant for FL-511 is Opening Doors of Northwest Florida.

Only the Lead Agency is eligible to apply for state Staffing funds and CoC Planning funds through the applicable grant opportunities. These funds will be used to provide dedicated staff and resources to carry out the Lead Agency's responsibilities.

The Lead Agency works closely with the Leadership Council, the membership, and its committees and workgroups to effectively coordinate the housing and services system to achieve the CoC's vision.

6.1. RESPONSIBILITIES

Key responsibilities of the CoC Lead Agency include:

1. **Administrative Support:** Providing logistical and administrative support for CoC activities, including organizing meetings, maintaining records, and facilitating communication among CoC members. This includes holding meetings of the full CoC membership, with published agendas, at least semiannually, and staffing CoC committees and workgroups.
2. **Federal Funding Coordination:** Managing the application process for HUD's CoC Program funding. Federally, this includes preparing and submitting the published CoC funding applications, known as the Notice of Funding Opportunity (NOFO).
3. **State Funding Coordination:** Working with the Leadership Council to design and manage a fair and transparent process to award State-funded homeless grants, including TANF, Emergency Solutions Grant, and Challenge grants. The Lead Agency must consult with the

State ESG recipient (Department of Children and Families) on the use of ESG funds and progress toward program goals.

4. **Local Government Coordination:** Working with the relevant local governments in the geographic area to coordinate resource allocation to address homelessness effectively and consulting with entitlement jurisdictions to ensure that the Consolidated Plan is aligned with the CoC's strategies and plans to allocate resources that meet the needs of homeless individuals and families and persons at risk of homelessness.
5. **Monitoring and Compliance:** Ensuring CoC-funded projects comply with HUD, State, and other funding requirements and relevant regulations. This includes monitoring program performance, conducting site visits, and providing technical assistance to CoC members.
6. **Performance Measurements:** Working with the Leadership Council to determine specific performance measures and benchmarks that consider the needs of people experiencing homelessness, including subpopulations.
7. **Coordination and Collaboration:** Facilitating collaboration among CoC members, including service providers, government agencies, and other stakeholders, to coordinate a comprehensive and integrated system of care for individuals and families experiencing homelessness. This includes the implementation and evaluation of the Coordinated Entry system throughout the geographic area.
8. **Strategic Planning:** Assisting the Leadership Council in developing and implementing a strategic plan to address homelessness. This involves an annual gaps analysis of the homeless needs and services available, identifying priorities, identifying funding, setting goals, and tracking progress.
9. **Point-in-Time (PIT) Count:** Conducting the PIT count according to HUD's requirements, at least biennially.
10. **Training and Capacity Building:** Providing training and support to CoC members to enhance their capacity to deliver effective services. This includes organizing workshops, sharing best practices, and offering technical assistance.
11. **Community Engagement:** Engaging with the broader community to raise awareness about homelessness, foster partnerships, and mobilize resources. The Lead Agency often acts as a spokesperson for the CoC in public forums and with the media.
12. **VAWA:** Developing the emergency transfer plan for the CoC that meets the most current VAWA requirements.

6.2. OVERSIGHT AND SELECTION PROCESS

The Leadership Council will hold the Lead Agency accountable for performance through a Memorandum of Understanding (MOU) that is reviewed and updated annually. Any member of the Leadership Council with a conflict of interest shall not participate in the Lead Agency's annual review. The Leadership Council may designate a committee to complete the review. If the Lead Agency fails to meet the expectations within the MOU, whether through a performance review or other measure, the Leadership Council will develop a performance improvement plan (PIP) with the deficiencies, recommendations, and a timeline to cure them. The PIP will be shared with the CoC membership.

Failure to Perform. If the Lead Agency does not cure the deficiencies according to the expectations detailed in the PIP, the Leadership Council will select a new Lead Agency using the following process.

1. The Leadership Council will notify the CoC membership of the performance deficiencies and the process to select a new Lead Agency.
2. The Leadership Council will vote to remove the current Lead Agency. A supermajority of two-thirds of all current Leadership Council members is required to proceed.
3. Once the vote has passed, the Leadership Council, or a committee designated by the Leadership Council, will develop and issue a Request for Proposals (RFP) for organizations to apply for the Lead Agency.
4. Based on the proposals submitted, the Leadership Council will select a new Lead Agency with a two-thirds supermajority vote of all current Leadership Council members. In the case that two or more applicant organizations have comparable scores on their submission to the Leadership Council, a simple majority vote of all current Leadership Council members will be sufficient to move forward with the vote to select a new Lead Agency.
5. The Leadership Council will notify the CoC membership of the selection of the new Lead Agency through the agenda and materials that are sent at least two weeks in advance of the next CoC general membership meeting or a special meeting.

Emergency removal. The Leadership Council is responsible for determining instances in which the Lead Agency may need to be immediately removed. These instances include:

1. Fraud, meaning:
 - a. Conclusive evidence of fraudulent activity
 - b. Reasonable suspicion supported by credible evidence
 - c. Admission of fraudulent conduct
 - d. Ongoing investigation revealing substantial indicators of fraud
2. Failure to submit the collaborative application
3. Requirement from HUD or the Department of Children and Families to remove the Lead Agency

VII. HMIS LEAD

The Homeless Management Information System (HMIS) Lead is the entity responsible for the administration and management of the CoC's HMIS. The HMIS is a locally administered, electronic data collection system that stores longitudinal client-level information about individuals and families who access homeless services. The role of the HMIS Lead is crucial for ensuring data quality, security, and compliance with federal and local requirements. The current HMIS Lead for FL-511 is Opening Doors of Northwest Florida.

7.1. RESPONSIBILITIES

Key responsibilities of the HMIS Lead include:

- Applying for HUD CoC Program funding to operate the CoC’s HMIS
- Ensuring that projects are meeting national, state, and local data quality objectives
- Ensuring that the CoC has an HMIS data privacy plan, security plan, and data quality plan
- Ensuring that the HMIS is administered in compliance with requirements prescribed by HUD
- Ensuring consistent participation by recipients and subrecipients in HMIS
- Providing training and technical assistance to HMIS users
- Reviewing data quality
- Submitting required reports to HUD and the Department of Children and Families
- Providing regular system performance reports to the Leadership Council

7.2. OVERSIGHT AND SELECTION PROCESS

The Leadership Council will hold the HMIS Lead accountable for performance through a Memorandum of Understanding that is reviewed and updated annually. Any member of the Leadership Council with a conflict of interest shall not participate in the HMIS Lead’s annual review. Only the HMIS Lead is eligible to apply for HMIS funds through HUD’s annual funding application for the CoC Program. These funds will be used to provide dedicated staff and resources to carry out the HMIS Lead’s responsibilities.

The process for performance reviews, performance improvement plans, failure to perform, selection, and removal follows the process outlined in 6.2.

VIII. COMMITTEES AND WORKGROUPS

The work of the CoC is extensive, and there are many responsibilities that a single entity, whether that be the Leadership Council, Lead Agency, HMIS Lead, or the membership, cannot effectively manage on its own. Therefore, the CoC, through its Leadership Council, will establish committees (ongoing or ad hoc) and workgroups (time-limited) to facilitate the CoC's work.

Each committee and workgroup will have a clear purpose, publish agendas and minutes, and communicate its findings, recommendations, and concerns to the Leadership Council. In establishing committees, the Leadership Council will include categories of expertise and stakeholder groups it desires to include on each committee.

Each committee should include people with lived experience, at least one Leadership Council member, and one Lead Agency or HMIS Lead staff member. Committees are open to people who have expertise and interest in the subject matter of the committee. Committees should elect their own chair, subject to ratification by the Leadership Council. Committee chairs must be a member in good standing. The Leadership Council must approve a committee member who does not hold active CoC membership.

IX. GENERAL PROVISIONS

This Governance Charter will be reviewed at least annually, and revisions will be recorded. The CoC membership will ratify the initial Governance Charter and approve the annual updates as developed and recommended by the Leadership Council or their designated committee.

Accessibility

Public meetings are held in ADA-accessible spaces and accommodate persons with disabilities (e.g., offering language interpretation, language line translation services, and materials in alternative formats). Upon request, accommodations are available to the public for meetings. All requests for reasonable accommodations must be made at least five working days in advance of the scheduled meeting date. For additional information, contact Opening Doors of Northwest Florida at (850) 439-3009.

X. APPENDIX A: DEFINITIONS

Below are commonly used terms within HUD's Continuum of Care programs and documents. While these are not all referenced within the Governance Charter, it is important for the entities responsible for carrying out CoC responsibilities to be familiar with these terms.

Affirmatively Furthering Fair Housing Final Rule. Requires recipients and subrecipients to take meaningful, proactive actions to affirmatively further fair housing by addressing disparities in housing access and opportunity, and intentionally working to alleviate segregated or disparate living patterns. See [24 CFR 578.93\(c\)](#) of the CoC Interim Rule.

Annual Homeless Assessment Report (AHAR). HUD report to the U.S. Congress that provides nationwide estimates of homelessness, demographic characteristics of homeless persons, service use patterns, and the capacity to house homeless persons. The report is based on HMIS data about persons who experience homelessness during a 12-month period, point-in-time counts of people experiencing homelessness on a single day in January, and inventory of shelter and housing available in a community.

At Risk of Homelessness. [24 CFR Part 576.2](#) of the ESG Interim Rule and [24 CFR 578.3](#) of the CoC Interim Rule defines At Risk of Homelessness. The definition in the Rule is detailed and should be reviewed for specific details about the definition.

Chronically Homeless. The final rule for the definition of chronically homeless and recordkeeping requirements were published in the Federal Register on December 4, 2015 with an effective date of January 4, 2016 and CoC Program recipients were required to comply no later than January 15, 2016. Review the [Chronically Homeless Final Rule](#) for details about the definition and the recordkeeping requirements.

Collaborative Applicant. The Collaborative Applicant is the eligible applicant designated by the CoC to collect and submit the CoC Registration, CoC Consolidated Application, and apply for CoC planning funds on behalf of the CoC during the CoC Program Competition. May also apply to HUD to be designated as a Unified Funding Agency (UFA).

Consolidated Plan. HUD approved plan, developed by states and local jurisdictions per the requirements of [24 CFR part 91](#) to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions.

Continuum of Care (CoC). The group organized to carry out the responsibilities required under [24 CFR part 578](#) and is composed of representatives of organizations, including nonprofit homeless service providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formally

homeless individuals to the extent these groups are represented within the geographic area and are available to participate.

Centralized or Coordinated Assessment System (Coordinated Entry). A centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals. The system covers the geographic area, is easily accessible and should ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs.

Developmental Disability. A severe, chronic disability of an individual that: (1) Is attributable to a mental or physical impairment or combination of mental and physical impairments; (2) Is manifested before the individual attains age 22; (3) Is likely to continue indefinitely; and (4) Results in substantial functional limitations in three or more of the following areas of major life activity: (i) Self-care; (ii) Receptive and expressive language; (iii) Learning; (iv) Mobility; (v) Self-direction; (vi) Capacity for independent living; and (viii) Economic self-sufficiency, (ix) Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

Disability. A person is considered to have a disability if the disability meets all of the following four criteria: 1. is expected to be of long, continuing, or indefinite duration; 2. substantially impedes the individual's ability to live independently; 3. could be improved by the provision of more suitable housing conditions; and 4. is one or more of the following: (a) physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury; and/or (b) developmental disability (please review full definition); and/or (c) the disease of acquired immunodeficiency syndrome or any condition arising from the etiologic agency for acquired immunodeficiency syndrome.

Emergency Solutions Grant (ESG). HUD program that provides funding to: (1) improve the number and quality of emergency shelters for homeless individuals and families; (2) help operate these shelters; (3) provide essential social services to shelter residents; and (4) prevent families and individuals from becoming homeless.

Equal Access Rule. Requires agencies who receive HUD funding to serve program participants, regardless of sexual orientation, gender identity, family composition, or marital status. It requires that all program participants have equal access to HUD's programs, shelters, other buildings and facilities, benefits, services, and accommodations. The Equal Access Rule also set a standard definition of family.

e-snaps. The electronic grants management system used by HUD's Office of Special Needs Assistance Programs (SNAPS). This system supports the CoC Program applications for funding

consideration and grant awards process for conditionally awarded projects under the HUD CoC Program.

Fair Housing Act. Federal regulations that protect people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities. Additional protections apply to federally assisted housing.

HMIS Lead. The eligible applicant designated by the CoC, in accordance with the CoC Program Interim Rule, to manage the CoC's HMIS on the CoC's behalf.

Homeless. On December 5, 2011, The Homeless Emergency Assistance and Rapid Transition to Housing: Defining "Homeless" Final Rule was published in the Federal Register. This rule defines four categories of homelessness and the corresponding recordkeeping requirements. Review the full Homeless Definition Final Rule for details about the definition and record keeping requirements. Note the related Defining Chronically Homeless Final Rule published December 4, 2015 for additional information.

Homeless Management Information System (HMIS). A local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Each CoC is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards.

Homelessness Prevention. A component of ESG assistance where funds are provided to individuals and families who meet the "at risk of homelessness" definition or who meet the criteria in paragraphs (2), (3), or (4) of the "homeless" definition in [24 CFR 576.2](#) and have an annual income below 30% of the median family income as determined by HUD, and lack the resources to obtain permanent housing. See [24 CFR 576.103](#) of the ESG Interim Regulations.

Housing First. A model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold).

Housing Inventory Count. An inventory of housing conducted annually during the last ten days of January. The count tallies the number of beds and units available on the night designated for the count by program type, and those dedicated to serve specific sub-populations of persons. CoC Program funds. (See 24 CFR 578.73(c) of the CoC Interim Rule for more information).

Longitudinal Systems Analysis (LSA). Produced from a CoC's HMIS and submitted annually to HUD via the HDX 2.0. The LSA provides HUD and CoCs with critical information about how people experiencing homelessness use their system of care.

Order of Priority. Established by CoCs for dedicated and prioritized PSH projects to ensure that those persons with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens and with the most severe service needs are given first priority. See [HUD Notice CPD-16-11](#) for more information.

Permanent Supportive Housing (PSH). A CoC program component type providing indefinite leasing or rental assistance combined with supportive services for disabled persons experiencing homelessness so that they may live independently.

Planning Grant. Non-renewable, annual grant awarded to the collaborative applicant to assist the CoC in carrying out its responsibilities that include among other activities: development of strategies for ending homelessness, evaluating project outcomes, submission of the CoC application to HUD and conducting the Point-in-Time Count.

Point-in-Time (PIT) Count. An unduplicated count on a single night within the last 10 days of January of the people in a community who are experiencing homelessness including both sheltered and unsheltered populations

Rapid Re-Housing (RRH). A permanent housing solution emphasizing housing search and relocation services and short- and medium-term rental assistance to move homeless persons and families (with or without a disability) as rapidly as possible into housing.

Recipient. An applicant of CoC Program funds that executes a grant agreement with HUD for CoC Program funds. To be eligible to apply for CoC Program funds, an applicant must be a private nonprofit organization, State, local government, or instrumentality of State or local government, Indian Tribes and Tribally Designated Housing Entities (THDEs) (as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103), and or a public housing agency as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion

Street Outreach. Essential services related to reaching out to all unsheltered individuals and families experiencing homelessness with the CoC's geographic area, including those least likely to request assistance. Services include connection to emergency shelter, housing, critical/crisis services, and urgent, non-facility-based care.

Subrecipient. A private nonprofit organization, State or local government, or instrumentality of a State or local government, Indian Tribes and Tribally Designated Housing Entities (THDEs) (as defined in section 4 of the Native American Housing Assistance and Self-Determination Act of 1996 (25 U.S.C. 4103), and or a public housing agency as such term is defined in 24 CFR 5.100, are eligible without limitation or exclusion that receives a subgrant from a recipient to carry out all or part of a CoC Program project.

Violence Against Women Act (VAWA). Creates and supports comprehensive, cost-effective responses to the pervasive crimes of domestic violence, sexual assault, dating violence, and stalking.

Written Standards. Written guidelines required for CoC and ESG recipients that establish standards for administering assistance that reflect local program design and need. The written standards must include policies and procedures for evaluating eligibility and determining and prioritizing which individuals and families will receive assistance.

XI. APPENDIX B: ROLES AND RESPONSIBILITIES CHART

The left-hand column describes the responsibility the Continuum of Care (CoC) has per [24 CFR 578](#) governed by HUD. The columns next to each responsibility provide information on the entity and the type of role they play.

Responsibility (Per 24 CFR 578 CoC Program Interim Rule)	Roles		
	<u>Approval and Oversight</u> ¹	<u>Primary Responsibility</u> ²	<u>Support Roles</u> ³
1. Operating the Continuum of Care			
a. Hold meetings of the full membership, with published agendas, at least semi-annually	<i>Leadership Council (Oversight)</i>	<i>CoC Membership, Lead Agency</i>	
b. Make an invitation for new members to join publicly available within the geographic area at least annually	<i>Leadership Council (Oversight)</i>	<i>CoC Membership, Lead Agency</i>	<i>Committee</i>
c. Adopt and follow a written process to select board members to act on behalf of the CoC. The process must be reviewed, updated, and approved by the CoC membership at least once every 5 years	<i>Leadership Council (Oversight & Approval) CoC Full Membership (Approval)</i>	<i>CoC Membership, Leadership Council</i>	<i>Committee</i>

¹ “Approval” indicates a requirement for a formal vote of the responsible body. “Oversight” indicates that reports and information will be provided to that responsible body by the Lead Agency, HMIS Lead, and/or Board committees.

² Primary Responsibility is the body that is ultimately responsible for ensuring the HUD regulation is met. While there are mostly clear distinctions between the membership, board, and Lead Agency, there are instances where the bodies may share responsibilities.

³ A Support Role indicates those bodies should be consulted and/or an active participant in carrying out the HUD regulation in addition to those already listed.

Responsibility (Per 24 CFR 578 CoC Program Interim Rule)	Roles		
	<u>Approval and Oversight</u> ¹	<u>Primary Responsibility</u> ²	<u>Support Roles</u> ³
d. Appoint committees, subcommittees, or workgroups as may be deemed necessary.	<i>Leadership Council (Oversight)</i>	<i>Leadership Council</i>	<i>Lead Agency</i>
e. In consultation with the CoC Collaborative Applicant and the HMIS Lead, develop, follow, and update annually a Governance Charter, which will include all procedures and policies needed to comply with CoC requirements as prescribed by HUD; and a code of conduct and recusal process for the board, its chair(s), and any person acting on behalf of the council	<i>Leadership Council (Oversight and Approval) CoC Membership (Approval)</i>	<i>Leadership Council</i>	<i>Lead Agency, HMIS Lead, Committee</i>
f. Consult with recipients and subrecipients of CoC funding to establish performance targets appropriate for population and program type, monitor recipient and subrecipient performance, evaluate outcomes, and take action against poor performers	<i>Leadership Council (Oversight and Approval)</i>	<i>Leadership Council</i>	<i>Lead Agency, HMIS Lead, Committee</i>
g. Evaluate outcomes of projects funded under the Emergency Solutions Grants program and the CoC Program and report to HUD (Also includes State funded programs)	<i>Leadership Council (Oversight)</i>	<i>Lead Agency</i>	<i>CoC and ESG Recipients, HMIS Lead, Committee</i>

Responsibility (Per 24 CFR 578 CoC Program Interim Rule)	Roles		
	<u>Approval and Oversight</u> ¹	<u>Primary Responsibility</u> ²	<u>Support Roles</u> ³
h. In consultation with the Collaborative Applicant, the HMIS Lead, and recipients of Emergency Solutions Grants funds, establish and operate a Centralized or Coordinated Assessment System that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services	<i>Leadership Council (Oversight)</i>	<i>Lead Agency</i>	<i>CoC and ESG Recipients, HMIS Lead, Committee</i>
i. In consultation with recipients of Emergency Solutions Grants funds within the geographic area, establish and consistently follow written standards for providing assistance. At a minimum, these written standards must include: <ul style="list-style-type: none"> i. Policies and procedures for evaluating individuals' and families' eligibility for COC assistance; ii. Policies and procedures for determining and prioritizing which eligible individuals and iii. families will receive transitional housing assistance; iv. Standards for determining what percentage or amount of rent each program participant must pay while 	<i>Leadership Council (Oversight and Approval)</i>	<i>Lead Agency</i>	<i>CoC and ESG Recipients, HMIS Lead, Committee</i>

Responsibility (Per 24 CFR 578 CoC Program Interim Rule)	Roles		
	<u>Approval and Oversight</u> ¹	<u>Primary Responsibility</u> ²	<u>Support Roles</u> ³
<ul style="list-style-type: none"> v. Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance; and vi. When the COC is designated a high-performing community, the COC will develop policies and procedures as set forth in 24 CFR 576.400(e)(3)(vi), (e)(3)(vii), (e)(3)(viii), and (e)(3)(ix). 			
1. Designate and Oversee HMIS			
a. Designate a single HMIS for the geographic area	<i>Leadership Council (Oversight and Approval)</i>	<i>Leadership Council</i>	<i>Committee</i>
b. Designate an eligible applicant to manage the CoC's HMIS, which will be known as the HMIS Lead	<i>Leadership Council (Oversight and Approval)</i>	<i>Leadership Council</i>	<i>Committee</i>
c. Review, revise, and approve a privacy plan, security plan, and data quality plan for the HMIS	<i>Leadership Council (Oversight)</i>	<i>HMIS Lead</i>	<i>Lead Agency, Committee</i>
d. Ensure consistent participation of recipients and subrecipients of CoC and Emergency Solutions Grants funding in the HMIS	<i>Leadership Council (Oversight)</i>	<i>HMIS Lead</i>	<i>Lead Agency, Committee</i>

Responsibility (Per 24 CFR 578 CoC Program Interim Rule)	Roles		
	<u>Approval and Oversight</u> ¹	<u>Primary Responsibility</u> ²	<u>Support Roles</u> ³
e. Ensure the HMIS is administered in compliance with requirements prescribed by HUD	<i>Leadership Council (Oversight)</i>	<i>HMIS Lead</i>	<i>Lead Agency, Committee</i>
2. CoC Planning - *Leadership Council should be very active in all CoC planning activities listed in this section and may take a stronger role here			
a. Coordinating the implementation of a housing and service system within its geographic area that meets the needs of the homeless individuals (including unaccompanied youth) and families. At a minimum, such a system will encompass the following: <ul style="list-style-type: none"> i. Outreach, engagement, and assessment ii. Shelter, housing, and supportive services iii. Prevention strategies 	<i>Leadership Council (Oversight)</i>	<i>Lead Agency</i>	<i>HMIS Lead, Committee</i>

Responsibility (Per 24 CFR 578 CoC Program Interim Rule)	Roles		
	<u>Approval and Oversight</u> ¹	<u>Primary Responsibility</u> ²	<u>Support Roles</u> ³
b. Planning for and conducting, at least, biennially, a Point-in-Time Count of homeless persons within the geographic area that meets the following requirements: <ul style="list-style-type: none"> i. Homeless persons who are living in a place not designed or ordinarily used as a regular sleeping accommodation for humans must be counted as unsheltered homeless persons; ii. Persons living in emergency shelters and transitional housing projects must be counted as sheltered homeless persons; iii. Annual Housing Inventory Count; and, iv. Other requirements established by HUD by Notice. 	<i>Leadership Council (Oversight)</i>	<i>Lead Agency</i>	<i>HMIS Lead, Committee, Volunteers</i>
c. Conducting an annual gaps analysis of the homeless needs and services available within the geographic area	<i>Leadership Council (Oversight)</i>	<i>Lead Agency</i>	<i>HMIS Lead, Committee</i>
d. Providing information required to complete the Consolidated Plan(s) within the CoC's geographic area.	<i>Leadership Council (Oversight)</i>	<i>Lead Agency and ESG/CoC Recipients</i>	<i>ESG/CoC recipients and subrecipients</i>
e. Consulting with State and local government Emergency Solutions Grants program recipients within the Continuum's geographic area on the plan for allocating Emergency Solution Grants funds and reporting on and evaluating the	<i>Leadership Council (Oversight)</i>	<i>Lead Agency, ESG/CoC Recipients</i>	<i>Subrecipients, Local Government</i>

	Roles		
Responsibility (Per 24 CFR 578 CoC Program Interim Rule)	<u>Approval and Oversight</u>¹	<u>Primary Responsibility</u>²	<u>Support Roles</u>³
performance of Emergency Solutions Grants recipients and subrecipients			