

RNCoC Lightning Training

CoC Responsibilities

24 CFR § 578.7

Why this matters now: The FY 2026 CoC NOFO was released on 6/1/2026 and is due 8/26/2026.

Steering Committee focus: what HUD requires of the CoC and what the Steering Committee should keep on track.

June 2026



Rural Nevada
CONTINUUM OF CARE



WINGED WOLF
INNOVATIONS¹

Why § 578.7 matters right now

- 24 CFR § 578.7 is HUD’s “job description” for the Continuum of Care.
- It tells us what the CoC must do to operate the system — not just to receive funding.
- With the FY 2026 CoC NOFO already open, these responsibilities are not theoretical — they affect readiness right now.
- Steering Committee’s role is to keep the work visible, scheduled, and moving between full membership meetings.

June–August reality

The NOFO is already out. Steering Committee should be able to quickly point to the CoC’s governance, HMIS oversight, planning activities, coordinated entry process, and performance work.

Simple takeaway

If someone asks, “How does RNCoC meet its CoC responsibilities?” Steering Committee should know where that work lives and whether it is current.

The 4 buckets of CoC responsibilities

A simple way to remember 24 CFR § 578.7

1. Operate the CoC

Membership meetings, open invitations for new members, board selection process, governance charter, and annual review of code of conduct / recusal process.

2. HMIS

Designate the HMIS, identify the HMIS Lead, and approve privacy, security, and data quality plans.

3. Planning

Complete PIT and HIC, conduct a gaps analysis, provide input for Consolidated Plans, and consult with ESG recipients.

4. Performance + CE

Set performance targets, monitor outcomes, take action when performance is poor, operate coordinated entry, and maintain written standards.

Steering Committee does not do every task directly — but it should know who owns each bucket and whether the work is on track.

What Steering Committee should keep on track

- ✓ Meeting cadence, posted agendas, and accurate minutes
- ✓ Committee deliverables brought forward at the right time
- ✓ Current governance charter, code of conduct, and recusal process
- ✓ Current HMIS privacy, security, and data quality plans
- ✓ Coordinated Entry policy, including a safe process for survivors
- ✓ Written standards, ESG consultation, and project performance review
- ✓ Early warning signs: missed deadlines, data quality issues, CE bottlenecks, or weak project performance

Steering Committee's role in two sentences:

Steering Committee prevents drift. If a requirement is slipping, the Steering Committee should catch it early and route it to the right lead, committee, or governing body.

Good monthly question

“What CoC responsibility needs attention before our next meeting?”

June–August Steering checklist

A quick compliance watch list while the NOFO is open

Every meeting

Check upcoming deadlines, confirm committee deliverables, and ask about any HMIS, CE, performance, or governance issues that need action.

Before major decisions

Confirm quorum, ask for conflicts of interest, and make sure the related policy, process, or recommendation is ready for action.

Before submission

Be ready to point to CoC governance, HMIS plans, CE policy, written standards, performance work, and any recent approvals or updates.

- ☐ Do we know what deadlines are between now and 8/26/2026?
- ☐ Are there any governance, HMIS, or CE items that need approval or review?
- ☐ Are there any project performance concerns that need follow-up?
- ☐ Are our consultation and planning touchpoints documented?
- ☐ If HUD asked today, could we show how RNCoC meets these responsibilities?

Scenario

HUD, a monitor, or a project applicant asks:
“How does RNCoC meet its CoC responsibilities under 24 CFR § 578.7?” What would we point to first?

Close

Steering Committee’s job is to keep these responsibilities visible, scheduled, and moving — so RNCoC is always ready, not scrambling at the last minute.

Key takeaway: Know the 4 buckets, know where the work lives, and keep it moving.