



BOARD OF SUPERVISORS
AGENDA LETTER

Agenda Number:

Clerk of the Board of Supervisors
105 E. Anapamu Street, Suite 407
Santa Barbara, CA 93101
(805) 568-2240

Department Name: Community Services
Department No.: 057
For Agenda Of: March 13, 2018
Placement: Departmental
Estimated Time: 45 minutes
Continued Item: No
If Yes, date from:
Vote Required: Majority

TO: Board of Supervisors
FROM: Department George Chapjian, Community Services Director (805) 568-2467
Director(s)
Contact Info: Dinah Lockhart, Deputy Director (805) 568-3523
SUBJECT: Update on Federal Homeless Continuum of Care Program in Santa Barbara County

County Counsel Concurrence

As to form: Yes

Recommended Actions:

Auditor-Controller Concurrence

As to form: N/A

That the Board of Supervisors:

- A) Receive and file an update on the federal Homeless Continuum of Care Program (CoC) and its implementation in Santa Barbara County;
- B) Consider the following actions regarding the County's role in the local Santa Maria/Santa Barbara County Continuum of Care (local CoC):
 - 1) Approve the County's assumption of "Lead Agency" responsibilities for the local CoC, which would be in addition to the County's existing roles of Collaborative Applicant, Homeless Management Information System (HMIS) Lead Agency, and Grant Administrator; or
 - 2) Decline assuming "Lead Agency" responsibilities for the local CoC and provide alternate direction to staff; and
- C) Determine that the recommended actions do not constitute a project subject to environmental review under the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15378(b)(5), as the actions are organizational or administrative activities of governments that will not result in direct or indirect physical changes in the environment, and direct staff to file a Notice of Exemption (Attachment A).

Summary Text:

The Board is being asked to receive and file an update on the County's participation in the federal Homeless Continuum of Care Program (CoC). The Board is also being asked to take on additional responsibility by providing "Lead Agency" support services to the Santa Maria/Santa Barbara County Continuum of Care (local CoC), a local network of homeless service providers, and other vested stakeholders. The lead agency support was previously provided by the Central Coast Collaborative on Homelessness (C3H), a non-profit agency, which chose in 2017 to redirect their efforts to providing street outreach to the homeless. However, their refocus now leaves a void in providing the lead agency services to the CoC; services such as administrative support to the CoC Board, and the Point In Time homelessness count, among other duties. Given that there is no other agency who can fill that void, and in order to guarantee that federal dollars continue to flow to the County, staff is recommending that the Community Service Department/ Housing and Community Development division take on the Lead Agency role for the CoC. If the County does not provide Lead Agency support to the local CoC, the County risks losing \$1.7 million annually in federal HUD funding, in addition to jeopardizing the County from being eligible to receive an additional \$4.2 million in other state and federal funding targeted to address homelessness, detailed in a July 25, 2017 staff presentation on HMIS. If the Board decides not to approve this option, staff requests the Board provide alternate direction to staff.

Background:

Since 1998, the County of Santa Barbara has applied for and received from the U.S. Department of Housing and Urban Development (HUD) competitive Continuum of Care (CoC) Program funds. Annually, the CoC Program provides approximately \$1.7 million to support the delivery of permanent housing, transitional housing, and supportive services for homeless persons throughout Santa Barbara County and leverages an additional \$4 million in other federal and state grants. In order to receive funds under the CoC Program, communities must establish a local CoC, or homeless assistance planning network composed of various stakeholders such as nonprofit homeless service providers, faith-based organizations, governments, businesses, advocates, school districts, hospitals, and law enforcement. Federal regulations stipulate the duties of the local CoC as the planning body responsible for coordinating homeless services within its geographic area. Additionally the local CoC must form a board, with specific compositional requirements.

While the local CoC and its board have been charged to administer the CoC Program in its geographic area, the CoC board can approach other entities, such as the County, or the Central Coast Collaborative on Homelessness (C3H), to request they carry out specific functions. In 2014, the responsibility of CoC Lead Agency was accepted by C3H and the Board of Supervisors (Board) approved the County Community Services Department's (CSD) Housing and Community Development (HCD) Division taking on the duties of Collaborative Applicant; Homeless Management Information System (HMIS) Lead Agency; and Grant Administrator. HCD currently has 2.0 FTE equivalent responsible for these CoC functions. The County provides \$90,000 annually to C3H, in part to provide CoC Lead Agency support to the CoC (Attachment B). Table 1 provides a brief description of duties of each role.

Table 1

CoC Major Function	Brief Description of Duties	Organization Carrying out Duty
CoC Lead Agency	<ul style="list-style-type: none"> ▪ The organization which has been designated by the local CoC to carry out responsibilities assigned to the local CoC – this includes: conducting the biannual point-in-time count and annual shelter count and inventory; convening and providing support to the CoC Board and it's sub-committees related to all aspects of COC program planning and implementation; keeping abreast of changes in HUD policy and funding priorities and ensuring the local CoC is in compliance and performing at a level sufficient to score highly in the annual funding competition; researching and making recommendations to the CoC board (and the Board of Supervisors, as appropriate) on policy initiatives and best practices in homeless service delivery; coordinating planning 	<ul style="list-style-type: none"> ▪ Previously filled by C3H; now partially filled by consultants
Collaborative Applicant/	<ul style="list-style-type: none"> ▪ Prepares the annual competitive application to HUD on behalf of the Santa Maria/Santa Barbara CoC ▪ Is the local point of contact for CoC and other federally agencies and HUD, and provides Technical Assistance (TA) to CoC funded agencies 	<ul style="list-style-type: none"> ▪ County CSD/HCD w/ consultants
HMIS Lead Agency	<ul style="list-style-type: none"> ▪ Administers the HMIS software program, provides TA to HMIS participating agencies, works with agencies to improve data quality 	<ul style="list-style-type: none"> ▪ County CSD/HCD w/consultants
Grant Administrator	<ul style="list-style-type: none"> ▪ Administers 2 subrecipient agreements (pass-through), CoC planning grant, HMIS grant, and potentially a new Coordinated Entry System subrecipient agreement in 2018. This includes compliance monitoring. 	<ul style="list-style-type: none"> ▪ County CSD/HCD w/consultants

C3H initially provided administrative support to the local CoC, however, with subsequent changes in C3H staffing structure and mission, C3H became more service and outreach focused, and provided less support to the CoC Board or local CoC program. In February 2017 C3H representatives told the CoC board C3H could not carry out the Lead Agency responsibilities needed by the CoC in order to carry out HUD requirements. During the same meeting, the CoC board requested County HCD staff provide the CoC Lead Agency administrative support previously provided by C3H. Since County HCD did not have sufficient in-house staffing to provide this support and had existing staffing vacancies, the County contracted with HomeBase, a HUD endorsed technical assistance provider and 'extra help' staff to provide technical support to the CoC in developing policies and procedures to implement the Coordinated Entry System (CES), and administrative support in order to implement other aspects of the CoC Program, such as HMIS. While this staffing arrangement has worked for the past twelve (12) months, hiring a Full Time Equivalent (FTE) Housing Specialist Senior would provide greater stability to the local

CoC, and sustainability by creating in-house expertise. Not providing any assistance to the local CoC threatens the region's ability to procure federal monies for homeless assistance and housing.

CoC Program

The HUD CoC Program is designed to promote community-wide goals to end homelessness; provide funding to quickly re-house homeless persons; promote access to mainstream resources; and optimize self-sufficiency among homeless persons. The CoC Program is guided by the HEARTH Act of 2009, and an Interim Rule published in 2012. Funds are competitively awarded to communities, and HUD evaluates how well the local CoC operates, including its governance structure, overall performance in addressing homelessness, and strategic planning processes. In 2017, County HCD utilized the services of HomeBase, a Bay area consultant with expertise in program development, to work with the local CoC in preparing the CoC competitive grant application, and to provide training and technical assistance to local housing and service providers in anticipation of the January 2018 deadline for communitywide Coordinated Entry System implementation. CoC duties and responsibilities include establishing a Board with representatives of relevant organizations such as nonprofit organizations, faith-based organizations, educational and governmental institutions, advocates, and homeless/formerly homeless individuals to carry out responsibilities set forth in the federal CoC regulations. HUD delegates to the local CoC how it will carry out these responsibilities, which usually fall to an agency designated as the "CoC Lead Agency".

Central Coast Collaborative on Homelessness (C3H)

In 2012, the Board of Supervisors supported the formation of a new collaborative community structure to address homelessness called the Central Coast Collaborative on Homelessness or C3H. The purpose was to merge and coordinate disparate existing homeless service delivery systems into a more coordinated and collaborative organization. Initially, C3H established an organizational framework to implement these objectives, which included a coordination committee, an executive oversight committee, a policy council, and working groups.

In 2014, C3H took action to assume the role of the CoC Lead Agency, on the condition that the County would take the roles of Collaborative Applicant and HMIS Lead Agency. As the Lead Agency, C3H was to be responsible for all aspects of providing administrative support to the CoC board, coordinating local homeless planning efforts and implementing decisions that affect the provision of homeless services countywide. This ultimately became an unsustainable workload for C3H, requiring the establishment and maintenance of a CoC Board; drafting Memorandums of Understanding to delineate the roles and responsibilities between the CoC, Collaborative Applicant, and HMIS Lead Agency; and having the appropriate C3H staff to support such duties. In April 2014 the Board approved County staff assume: 1) the responsibility of operating the HMIS as the HMIS Lead Agency; 2) the role of Collaborative Applicant to lead the planning, preparation and submission of the annual CoC grant application to HUD; and 3) Grant Administrator responsibilities for the Clean and Sober Living Program and the Lompoc Transformative Housing Program, both operated by Good Samaritan Shelter. The Central Coast Collaborative on Homelessness (C3H) accepted the role of Lead Agency of the CoC which includes CoC planning, oversight, coordination and support to the CoC board; and specific tasks

such as conducting the biannual point-in-time count and annual shelter count and housing inventory. In August 2014, the CoC board approved representatives from the County to the CoC, which included representation from the County Executive Office, a supervisorial district representative, and a Sheriff's Department Representative.

Direct Benefit of the CoC Program

In 2017, the local CoC program received approximately \$1.7 million for local homeless service providers (Attachment C). As a direct benefit, the CoC program provides funding for the provision of permanent supportive housing, transitional housing, and supportive services. The CoC program also promotes coordinated planning across stakeholder groups, in order to provide services to the most vulnerable homeless populations. Persons assisted include chronic homeless, victims of domestic violence, persons with substance abuse, mental illness, and includes individuals, veterans, and families with children. An example of preliminary results from the impact of the CoC are also available from a recent review of the local CoC's permanent housing placement data from HUD's System Performance Measures (SPM) (Table 1). The SPM provide aggregate data on permanent housing placement for all providers participating in the HMIS. It is important to understand this data in context. Because many homeless service providers do not participate in HMIS, HMIS data and SPM only captures a portion of housing placements in the county. Moreover, SPM are a new tool, rolled out by HUD in 2016. Therefore, communities are currently focused on being able to use HMIS to report on SPM and improve the quality of the HMIS data reported in SPM. Accordingly, the data quality and conclusions which can be drawn are still considered preliminary. Staff believe that over the next couple of years, baseline data will provide a better reflection of how well the county's homeless response system performs for reducing the incidence and length of homeless experiences for individuals and households, at least as entered in HMIS.

Table 1: System Performance Measures (SPM) Metric 7b.1 – Change in exits to permanent housing destinations

	Federal FY 2015 (10/1/2014 – 9/30/2015)	Federal FY 2016 (10/1/2015 – 9/30/2016)	Difference
Universe: Persons in emergency shelter, transitional housing and rapid rehousing who exited	2090	2004	-86
Of the persons above, those who exited to permanent housing destinations	770	731	-39
% Successful exits (i.e. exits to permanent housing)	37%	36%	-1%

Table 2: Metric 7b.2 – Change in exit to or retention of permanent housing

	Federal FY 2015 (10/1/2014 – 9/30/2015)	Federal FY 2016 (10/1/2015 – 9/30/2016)	Difference
Universe: Persons in permanent housing (excluding rapid rehousing)	274	320	46
Of persons above, those who remained in permanent housing and those who exited to permanent housing destinations	259	293	34
% Successful exits/retention (i.e. exits to or retention of permanent housing)	95%	92%	-3%

Table 1 shows just over a third of people who exit emergency shelters, transitional housing or rapid rehousing projects have been placed into permanent housing. Table 2 notes more than 90 percent of people who are permanently housed remain permanently housed. These preliminary performance metrics are early indicators of progress being made by the local CoC in returning homeless households to stable and permanent housing. Again, this data only reflects that portion of housing placements in the county that report into HMIS.

Indirect Benefit from Leverage

A number of other state and federal funding programs for homeless services require participation in the CoC's HMIS or coordination with the Coordinated Entry System. These include State Emergency Solutions Grant (ESG) funding, Veterans Administration (VA) Supportive Services Funding for Veteran Families (SSVF); Department of Health and Human Services-Project for Assistance in Transition from Homelessness (PATH) Grant and Runaway Homeless Youth (RHY) funding, and State No Place Like Home (NPLH) funding. The funding which accrues to regional service providers leveraged through the County's participation in the CoC program is shown in the following table.

Table 3

2015-18 Funding to Santa Barbara County Region Leveraged by the HUD CoC Program

Agency	Program	Amount	Year
Carrillo Counseling	Street Outreach (Federal VA - Supportive Services to Veteran Families (SSVF))	\$ 365,976	2017
		\$ 362,352	2016
Salvation Army (LA, Ventura, Santa Barbara Counties)	Emergency Services	\$ 1,624,231	2017
		\$ 884,482	2016
County of Santa Barbara	No Place Like Home (NPLH)	\$ 2,700,000*	2018
County of Santa Barbara	Projects for Assistance in Transition from Homelessness (PATH) U.S. Dept. of Health and Human Services	\$ 58,093	2016
		\$ 57,791	2015
County of Santa Barbara	State Emergency Solutions Grant (ESG)	\$ 679,210	2016
		\$ 583,706	2017
		\$ 823,572	2018 (est.)

Channel Islands YMCA	Street Outreach	\$ 94,552	2015
	Basic Services (food, shelter)	\$ 197,898	2015
Total		\$ 8,431,863	

*\$2.7 million (and additional funds on a competitive basis) in NPLH funding expected in 2018

CoC Funding is Competitive

Unlike HUD's traditional entitlement programs, such as the Community Development Block Grant (CDBG), the Emergency Solutions Grant (ESG) Program or Home Investment Partnerships Programs (HOME), which provides an annual 'entitlement' allocation to local communities based on a formula, the Continuum of Care Program is competitive, and annual applications are evaluated, ranked and scored by HUD, with no guarantee that communities will receive funding from year to year.

Administration of CoC grants also differs from the administration of CDBG, ESG and HOME grants. In the CDBG, ESG, or HOME programs, HUD funding passes through the County to local subrecipient or grant recipients; the County has direct financial administrative control over grant subrecipients. In contrast, under the CoC Program, HUD places responsibility on the local CoC, and indirectly on the CoC Lead Agency, to administer the CoC program. Examples of CoC program administrative duties include developing work plans; improving data quality and reporting; promoting housing placements; developing a service and housing gaps analysis; establishing performance targets for CoC and ESG grant recipients; convening meetings of the CoC general members, CoC board, and CoC subcommittee; and overseeing the implementation of Coordinated Entry among all CoC and ESG providers, among other duties. The County, in its role as grant administrator and 'Collaborative Applicant', also prepares the annual consolidated CoC grant application to HUD on behalf of all CoC grant recipients and administers grants directly received by the County for HMIS, planning, and Good Samaritan 'pass-through' funding for two projects.

County CSD receives no funding from HUD for the general administration of the CoC program or to perform any Collaborative Applicant functions. However, HUD does provide CoC planning grants to the County to fund specific functions, such as monitoring CoC grant recipients, or developing a Coordinated Entry System. The County received \$52,823 in 2016 for CoC program monitoring and evaluation.

The CoC Program requires communities address homelessness through comprehensive planning, coordination, involving a broad range of stakeholders. A successful CoC requires consistent community engagement, follow-up, and accountability. The following is listing of the additional programs the CoC is required to administer:

1. HMIS

HUD requires all CoC's implement a single Homeless Management Information System (HMIS) within their geographic area that is capable of storing client-level information on the characteristics and service needs of homeless persons and persons at risk of homelessness. Since 2005, the County has overseen day-to-day system administration, provided technical support and training and ensured system integrity and availability. CSD applies annually for funds under

the CoC Program to partially finance system and staff costs; CoC program funds are the primary source of funding for the countywide HMIS. CSD receives \$158,000 in CoC funds annually for staff costs. HUD intends that data entered into the HMIS database be used to generate outcome statistics (System Performance Measures) to measure how well a local CoC has prevented homelessness and improved services and access to housing for homeless persons and households. HUD has indicated it will consider a community's success in addressing homelessness and improving outcomes for program participants as an important factor in how HUD will competitively award federal funds.

2. System Performance Measures (SPM)

To help communities gauge their progress in preventing and ending homelessness, in 2016 HUD identified seven system-level performance measures, which are generated through HMIS and are based on beneficiary data entered on clients receiving housing and services from homeless service providers. SPM data will be used by HUD and the CoC to determine how well a community is making progress on improving the outcomes of homeless households assisted by the local CoC's service delivery system. System Performance Measures include: 1) Length of time persons remain homeless (as defined by HUD); 2) The extent to which persons who exit homelessness to permanent housing destinations return to homelessness; 3) Number of homeless persons; 4) Jobs and income growth for homeless persons in CoC program-funded projects; 5) Number of persons who become homeless for the first time; 6) Homelessness prevention and housing placement of homeless persons in CoC-funded projects; and 7) Successful housing placement. Statistics generated from System Performance Measures, however, only reflect the status of homeless persons and households being assisted with HMIS participating agencies, which while a significant segment of the homeless population, currently does not include a number of important providers of housing, shelter, and mainstream services. A key responsibility of a CoC, accomplished through the CoC Lead Agency is to utilize SPM to establish performance targets for each program type, monitor CoC grant recipient performance, evaluate outcomes and take actions against poor performers.

3. Coordinated Entry (CE) System

In January 2017, HUD issued new requirements for all CoC's nationwide to coordinate existing homeless services, shelter, and permanent supportive housing using a Coordinated Entry (CE) system. This approach stresses that local providers use the same standardized assessment to prioritize people who are most in need of homeless service assistance and then match those in need with the most appropriate provider. The HUD CE system strongly emphasizes a Housing First approach that centers on providing homeless people with housing quickly, without requiring sobriety or cessation of drug use as a condition of housing, and then providing services as needed. When the Interim Rule for the HUD CoC Program was issued in 2012, the operation of a CE system was identified as a required program element, with basic parameters. In the intervening five years, HUD collected practitioner "best practices" on implementing a Coordinated Entry system, which has added additional requirements and protocols. Local providers are currently assessing how the CE system and fully implementing Housing First will affect how existing programs operate, and how program participants are selected for housing placement. In October 2017, County HCD issued a Request For Qualifications (RFQ) to solicit proposals from community organizations interested in being designated as the Coordinated Entry System Lead

Agency. The United Way of Northern Santa Barbara County (UW) responded to the RFQ, and in November 2017 was approved as the CES Lead Agency by the CoC Board. In January 2018 the Board approved the selection of the UW as CES Lead Agency and a Memorandum of Understanding (MOU) between the County and the UW. The HUD deadline for CoC's to implement a CE system was January 23, 2018, and the local CoC appears to have met the deadline. HUD has not indicated how it will monitor compliance or how it will penalize communities that do not meet federal requirements. State HCD also requires CE system implementation for its subrecipients such as the County under the State ESG Program and the No Place Like Home Program.

Discussion:

CSD receives no funding from HUD to administer the CoC program, although CSD applies annually and receives \$158,000 to administer HMIS, and receives \$2,085 annually from HUD to administer the two CoC pass-through grants to Good Samaritan Shelter. HCD receives from the County's General Fund \$137,000 for homeless programs staff support and \$48,000 to administer the State ESG program. In 2016, HCD further maximized efficiencies by deleting 1 FTE Administrative Office Professional (AOP), redistributed the AOP position's duties to other CSD staff, and used the savings to fully fund 1 FTE to oversee the State ESG and all homeless grant contracts. These three (3) staff positions to oversee 1) the CoC program (including CES, Point In Time counts, CoC grant application preparation, CoC organizational support), 2) HMIS Lead Agency functions, 3) State and Federal Emergency Solutions Grant (ESG) funding, and 4) General Fund Shelters and Warming Shelters contracts is insufficient to provide the necessary staff support to fully carry out the HUD mandates of the CoC Program.

CoC's in Benchmark Counties

In 2017 CSD staff recently surveyed several CoC's in other California counties, including a few benchmark counties (Attachment B). CoC's surveyed had, on average, 2.5-3.0 FTEs dedicated to performing CoC Lead Agency, Collaborative Applicant, Grant Administrator and HMIS functions.

During 2017 HCD has supplemented the current HCD CoC Program staffing by using consultants and 'extra help' personnel. These resources allowed for the provision of technical assistance to service providers for HMIS and Coordinated Entry System implementation, to prepare the annual CoC competitive grant application for submission to HUD in September 2017, and to provide CoC Board support. These resources were supported by the one-time CoC planning grant, salary savings, and fund balance. However, this funding scenario is unsustainable in the long term, as the withdrawal of C3H from its role as CoC Lead Agency, and additional HUD program requirements of Coordinated Entry implementation, require additional staffing resources.

Currently, County HCD's Homeless Program has 1 FTE dedicated for HMIS related programming, 0.5 FTE equivalent for other CoC programming, and 0.5 FTE to administer CoC contracts.

Staffing	CoC FTE's	Duties
Homeless Program Manager	0.5	CoC Homeless Programs Oversight, including: <ul style="list-style-type: none"> • Federal CoC Program Management, Collaborative Applicant, and Grant Administrator • State ESG Program (requires CoC participation) • Federal ESG Program (requires CoC participation)
Housing Program Specialist II	1.0	<ul style="list-style-type: none"> • HMIS System Administration
Housing Program Specialist I	0.5	<ul style="list-style-type: none"> • CoC Homeless Grant Contracts and reporting (HMIS, Pass-Through subrecipients, CES, Planning Grant)
Total CoC FTE's	2.0	

*The Homeless Program Manager and Housing Program Specialist I also administer Non-CoC grants and contracts, such as State and Federal Emergency Solutions Grant (ESG), General Fund Shelter and Warming Center grants

Unmet Need

Without the County's participation as CoC Lead Agency, the continuation of the CoC Program in Santa Barbara County is at risk. Additional staffing resources are needed to implement the comprehensive, coordinated, and systematic planning, administration, training, monitoring, and operations to carrying out an effective continuum of social services and housing options to fully address the causes and work toward the solutions for ending homelessness in the County. Without a CoC Lead Agency in place, which is the current status, the following programmatic gaps exist, such as a need to:

- Provide lead oversight on the development of a coordinated effective homeless delivery response system;
- Continue to implement a Coordinated Entry (CE) system;
- Convene stakeholders for comprehensive planning on improving coordination, identify service gaps, opportunities for collaboration around developing funding resources;
- Research and stay abreast of HUD initiatives and best-practices to ensure compliance, funding competitiveness, and an effective, coordinated system of care;
- Evaluate outcomes for CoC and ESG funded projects;
- Monitor and help improve the quality and performance of funded programs.

Fiscal and Facilities Impacts:

Staff is aware of current County budgetary constraints. However, the County and local stakeholders may miss opportunities to maintain existing funding and be less competitive for additional homeless and housing programs if the County is unable to carry out these planning functions.

Key Contract Risks:

The roles described above—Collaborative Applicant, HMIS Lead Agency, Grant Administrator, and CoC Lead Agency — carry varying degrees of risk. HUD has not formally established the liability for Collaborative Applicants or CoC Lead Agency, but discussions with various HUD officials indicate that the liability is limited. However, if the County is unable to

maintain the required federal mandates of the CoC program, future annual CoC funding awards may be at risk along with other leveraged funding. Recipients of CoC Program funds, and not the County as Collaborative Applicant, would be held liable for non-compliance with program regulations and requirements. As the HMIS Lead Agency, the County will be held liable if funds awarded through the CoC Program for the administration of HMIS are misused. As Grant Administrator, the County, as recipient of CoC Program funds, will be held liable if it or a project sponsor is found to be non-compliant with program regulations and requirements. A critical risk to the County of not insuring that CoC Lead Agency support is provided to the local CoC is the potential reduction in federal CoC funding, and putting at risk an additional \$4 million in other federal and state homeless-related funding that is awarded to other non-CoC funded programs.

Attachments:

Attachment A:	CEQA Notice of Exemption
Attachment B:	C3H Scope of Work
Attachment C:	Local CoC recipient agencies
Attachment D:	Continuum of Care Staffing Matrix