



TACIR

The Tennessee Advisory Commission
on Intergovernmental Relations



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MEMORANDUM

TO: Commission Members

FROM: Cliff Lippard
Executive Director

DATE: 18 December 2025

SUBJECT: Public Chapter 445, Acts of 2025 (Continua of Care)—Draft Report for Review and Comment

The attached commission report is submitted for your review and comment. It was prepared in response to Public Chapter 445, which requested a commission study of the Continua of Care in Tennessee, how they might be improved, and how they might compare to Continua of Care in other states.

The commission finds that there are opportunities to improve the Continua of Care in Tennessee with added funding, better data, and improved coordination among various stakeholders, including state agencies. The Continua of Care, along with all organizations that work to serve Tennesseans who become homeless, face intense challenges: Ever more people are becoming homeless, and when that happens they may have needs that go beyond finding new housing, such as medical care, legal aid if they are fleeing domestic violence situations, help finding a job and childcare, applying for new IDs that they may have lost or had stolen, and much more. The complexity of these needs, along with the fact that there is a patchwork of private organizations and government agencies from the federal to the local level that touch on homelessness, makes the coordination work of the CoCs more challenging. Based on these and other findings, the draft report makes six recommendations:

- Homelessness is associated with numerous harms to those who experience it, including deteriorations in health and an increased risk of suicide. For communities, the costs of either housing people who are homeless in emergency shelters or holding them in detention can run into the tens of thousands of

dollars per person. Preventing people from losing their housing in the first place is usually far more cost-effective and beneficial for all involved, but regulations generally prohibit CoC funding from HUD being used for this purpose.

Therefore, **the commission recommends the General Assembly appropriate funding to CoCs that may be used to cover expenses that conventional HUD CoC grants do not.**

- Each CoC maintains a database, called HMIS, that can help provide a fuller understanding of homelessness in a community, shedding light on such issues as how long households are left homeless, how often they might lapse back into homelessness, or what services are used. That information is vital for effective planning and strategizing around homelessness. But not every local service organization can or will contribute data to HMIS, potentially leaving gaps in understanding. To use the database, service organizations require end user licenses, which can sometimes come with a fee of up to a few hundred dollars. Stakeholders report that where CoCs have been able to cover these license costs, they have been able to improve reporting, ensuring better data coverage. For this reason, **the commission recommends the General Assembly appropriate funding to cover the HMIS end user licenses of service providers to incentivize participation in the system by those who are not obliged to report their data by federal grant requirements.**
- Some states have also implemented a single, statewide HMIS for all their CoCs, but Tennessee's CoCs currently operate 10 separate systems. Stakeholders say it would be invaluable to have more integrated, state-level data on homelessness, but converting to a single HMIS comes with several costs and challenges. As an alternative, **the commission recommends the General Assembly appropriate funds for the University of Tennessee's Social Work Office of Research and Public Service (SWORPS) for aggregating HMIS data from all 10 Continua of Care in the state.**
- Additionally, **the commission recommends SWORPS use the data to produce dashboards that make data on homelessness more accessible, including a dashboard to display aggregated data of service needs collected by Coordinated Entry systems.**
- Meeting the needs of people who are homeless requires the coordination of many stakeholders, including government agencies, and where communities elsewhere in the country have made progress on homelessness, it has often been

attributed to just such coordination. One approach for building such coordination that has been used in other states—and in Tennessee in the past—is an interagency council on homelessness (ICH). An ICH would assemble representatives of CoCs, homelessness service organizations at large, and state agencies, and in so doing it would give them the opportunity to communicate, identify gaps in services, review data on homelessness in different corners of the state, eliminate duplication of effort, and agree on a common strategy. **The commission recommends that the state reestablish a state interagency council on homelessness—with representation from all 10 Continua of Care in the state as well as state agencies—charged with studying, testing, and promoting best practices among homeless service providers; collating and publishing data on homelessness around the state; and facilitating communication between service providers and government agencies to streamline the provision of services to those in need.**

- One of a CoC's functions is to connect people seeking help with the services appropriate for their individual needs, part of a process called Coordinated Entry. Anecdotally, though, it can be very difficult for people who are homeless to figure out where to first turn for help; websites may include erroneous links, and when calling service organizations, they may face long waits or being repeatedly referred to someone else. At least some CoCs are making efforts to try to improve their Coordinated Entry—such as refining their assessments for people's vulnerabilities and needs—but there are no commonly agreed upon or standardized measures for assessing how quick or effective the different channels for reaching Coordinated Entry are. **The commission recommends that the state ICH, once established, redevelop and streamline the state's websites for linking people to homelessness services, while also working with the CoCs to develop a common, agreed upon set of measures for Coordinated Entry to test how quickly people in need can locate, reach, and receive services, and then use that information to continually improve Coordinated Entry procedures.**