

April 2025

Managing uncertainty for CoCs and homeless services providers

Abstract:

This report provides steps for how Continuums of Care (CoCs) and homeless response system providers can manage uncertainty. It covers processing new information as an organization, communicating with clients following trauma-informed principles, managing CoC grants, and adapting budgets.



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Introduction

Purpose of this report

Continuums of Care (CoCs) and their partner agencies receive funding to support their work from federal, state, county, and other local sources. Changes or surprises in policy at any level can impact organizational cash flow and operations. We saw this during the financial crisis in 2008, we've experienced it during government shutdowns, and we experienced it during the initial months of the COVID pandemic. Many organizations are facing similar financial and programmatic uncertainty in 2025.

There are steps CoC-funded agencies can take to put themselves in a strong position to weather the uncertainties. This report contains six fact sheets with recommendations on the following topics:



Best practices for financial management and workflow.



Staying current in HUD's Electronic Line of Credit Control System (eLOCCS).



Organizational strategies for processing new information.



Complying with federal regulations & requirements.



Managing CoC grants and adapting budgets under challenging circumstances.



Communication with clients around uncertainty.

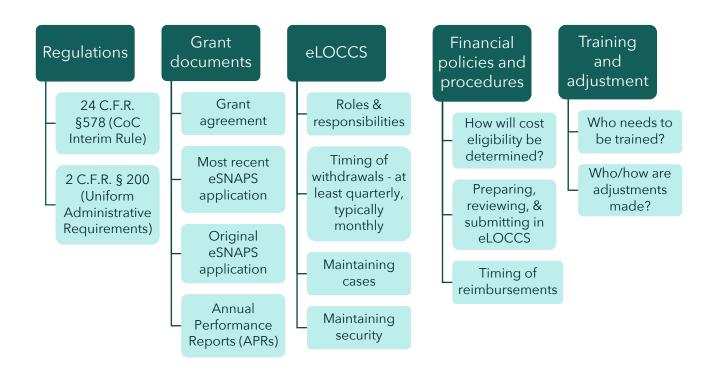


Best practices for financial management and workflow

There are five essential elements that all organizations should be aware of when it comes to ensuring healthy financial management of a CoC-funded agency. This section provides information about these elements.

Essential elements of financial management









Regulations

Regulations are the backbone of the CoC. They are the building blocks for federal funding. They are the answer book for all things CoC-related. For CoC funding, <u>24</u> <u>C.F.R. § 578</u> (CoC Interim Rule) and <u>2 C.F.R. § 200</u> (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) are especially important.

Grant documents

Primary grant documents form the contract the CoC has with the U.S. Department of Housing and Urban Development (HUD). They provide the clues on how to track:

- The 15-digit grant number, which usually starts with the first two initials for the state where the activity will take place (i.e., for an Oregon grant OR1234567891234)
- The period of performance (i.e., the start and end date of the project, the total amount in the agreement, and the agreed upon activity line items)
- The application/s submitted for NOFO, including current applications and those funded more than one year. This likely will also include the original eSNAPS application for a project. These documents provide more detail on the budget, including both the total and line items costs.
- Annual Performance Reports (APRs) provide a historical look at the performance of the project/s.

Electronic line of credit control system (eLOCCS)

eLOCCS functions like a HUD ATM. eLOCCS is the system an organization/agency goes into to request and get funds wire transferred to your account. There are specific processes to get access into the system.

Note: Organizations should have more than one person who has the authority to enter into eLOCCS. In general, it's recommended that at least two to three people within an organization are aware of financial processes, aware of grants, aware of eligible activities, and more than one person can access withdrawals through eLOCCS.

HUD requires that grant recipients use eLOCCS to draw down their funds at least quarterly. While organizations can draw down as often as once/day, a more

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reasonable approach is monthly. For more detailed information about eLOCCS, see the second part of this series, *Staying Current in HUD's eLOCCS*.

Financial policies and procedures

Think of these as your CoC-funded agency's financial management to-do list:

- How should the organization do what is needed to draw down funds and verify expenses with supporting documents? The policies and procedures lay out the process to do that.
- What are the roles and responsibilities of specific staff? Who are the authorized users of eLOCCS? Who can approve vouchers?

Periodically it is healthy to ask: Do the policies need to be changed? Is now a time to consider changes to policies?

Training and adjustments

Training and adjustments are important because determining eligible expenses and drawing down funds are complicated processes that have serious repercussions if not done correctly. There are a whole host of training resources related to all of HUD's financial management processes, some that hit the high notes and other that go into more depth.

Homebase encourages a broad level of knowledge across different layers of the organization. Crosstrain people, so they are familiar with the requirements that are imposed on their colleagues. It can facilitate good organizational conversations, be good for board education, and help other partners have a window into all the responsibility and requirements that go along with receipt of HUD funds.



Staying current in HUD's eLOCCS

The grant disbursement system for the U.S. Department of Housing and Urban Development's (HUD) is the Electronic Line of Credit Control System or eLOCCS. This system is used to manage cash and distribute grants for most HUD programs. This section provides tips for how CoCs can stay current in eLOCCS during periods of uncertainty.

Background

CoC-funded agencies use eLOCCS to draw down federal funds that have been allocated to them, most often for reimbursement after funds have been expended (with some exceptions, see Complying with Federal Regulations and Requirements for other, more narrow, options).

During uncertain times, it is essential that CoC-funded agencies stay current on eLOCCS, i.e., draw down funds owed to them based on what they have expended. Staying current should be done on a regular and consistent basis.

There are many reasons why a CoC might be behind in their eLOCCS draw down:

- Policy (i.e. only draw from eLOCCS on a quarterly basis, rather than more frequently like monthly or bi-weekly)
- Staff turnover
- eLOCCS passwords and/or authorizations have expired¹
- Other important CoC activities that took precedence over draw downs
- Avoiding the mundane, etc.

¹ For resources to help trouble shoot eLOCCS access please see, <u>eLOCCS resources</u>, <u>eLOCCS quick</u> reference guide, and <u>eLOCCS & Financial Management Training for YHDP Recipients Webinar</u>.

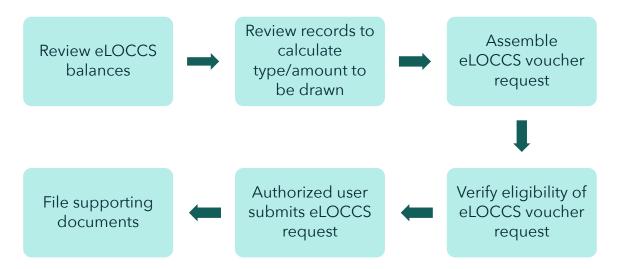




Especially during uncertain financial times, it is important to get and stay current on eLOCCS requests.

Steps to stay current on eLOCCS requests





Review eLOCCS balances

First, find out how much money you have already withdrawn under your current allocation. There are tabs in the eLOCCS system that allow you to review the current spending of any grant. Be sure you are up to date on all the grants associated with your project.

Use the "BUDGET" tab to obtain the full amount of your grant agreement from HUD. The tab should display the:

- Amount authorized
- Amount disbursed
- Payments in process (past couple of days)
- Balance

Click through the entirety of eLOCCS, which will enable you to compare and calculate. Determine if all grants are at the current amount. Be clear on what has already been drawn down and what the matches have been to know what your organization has already spent.



Review records to calculate type/amount to be drawn

To figure out the amount to be drawn, pull together reports, records, and other key materials that identify your organizational spending under the grant. Ascertain what the eligible costs are for the next draw down and what supporting documentation is needed to justify those costs. Examples of supporting documentation include:

- Time and Activity reports
- Invoices
- Receipts

Assemble the eLOCCS voucher request

Complete the voucher request through eLOCCS.

Verify eligibility of eLOCCS voucher request

You should have a designated staff person in the organization who goes through the associated costs under the grant agreement and approves what will be submitted in eLOCCS. This person should be a different staff person than the one who actually enters information in eLOCCS and requests the draw down. The designated staff person should ensure that:

- The expenses you are planning to submit are eligible expenses;
- They were spent during the time of the grant; and
- Supporting documents exist to verify them.

Authorized user submits eLOCCS request

It generally takes approximately 24 hours for the funds drawn down to be wire transferred from eLOCCS to your organizational bank account.

File supporting documents

Upload any records used to calculate the type/amount to be drawn, including any time and activity reports, invoices, and/or receipts.



Complying with federal regulations & requirements

This section covers the financial management components of two key federal regulations that may be relevant during times of uncertainty.

Background

Recipients of CoC funds should familiarize themselves with two regulations that detail grant and financial management requirements:

- 24 C.F.R §578 (Continuum of Care Program)
- <u>2 C.F.R. §200</u> (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards)

There are many topics covered under both federal regulations. Our focus here is to highlight the financial management components that might be of concern during uncertain times.

CoC financial management considerations

There are several critical elements that CoC recipients will want to have in place to facilitate effective financial management. Taking steps to address those critical elements can put CoCs and CoC-funded agencies in strong positions to weather uncertain times. These include:

- Ensure that the CoC and the CoC funded agencies have clear, comprehensive, and current *program policies and procedures*, especially related to how grant resources will be used (for example, clear information about the amount program participants are required to contribute for rapid rehousing).
- Maintain detailed, organized financial records with source documentation.
- Develop and retain clear policies and procedures regarding match funds, including cash and in-kind contributions.

Homebase

- Establish a clear methodology to track and verify match funds, how they were contributed, how they were documented, etc. for all CoC program-eligible expenses.
- Maintain "real-time" time and activity reports. These should include staff time spent on allowed allocated projects.
- Meet all audit requirements and be current with any required audits. A federally qualified single audit is required if your organization/agency expends \$1 million or more during its fiscal year.
- If costs across projects will be shared, be sure that the policies and procedures delineate how the costs will be shared and document pro-ration of shared costs.
- Confirm your organization has everything in place to withstand scrutiny by reviewing the HUD Monitoring Guidance, Chapter 34, which offers a comprehensive way to self-monitor.

Methods of payment

The federal governments allow for various methods of financial management for CoC-funded programs, outlined in 2 C.F.R. §200.305. There are two payment methods allowed for CoC funds:

- Reimbursement
- Advance Payment Method





Federal payment reimbursement

Image 3. Summary of steps required for federal payment reimbursement



Reimbursement is the most straightforward method. This is how it works:

- 1. Your organization incurs eligible expenses (staff time, purchases, supplies, etc.).
- 2. You pay for those expenses out of your own organization's resources.
- 3. You review your records to determine that they are expenses for the CoC.
- 4. For those expenses that are eligible, you then build your payment request.
- 5. You submit the payment through eLOCCS vouchers.
- 6. Your organization retains the records.

The organization must have resources to front the money to get reimbursement. You are seeking funds from HUD to pay for what the CoC-funded agency has already spent. The CoC-funded agency pays itself back from the line of credit control system, (i.e., eLOCCS).

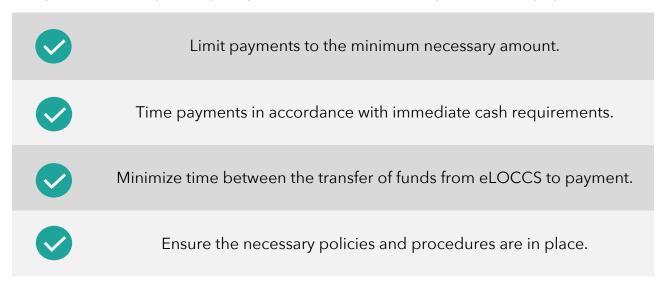
HUD encourages CoC-funded agencies to use the reimbursement method. It is more straightforward and not as complicated as the advance payments method.



Advance payments method

Advance payments are allowable but must be limited to the minimum amount needed and must be timed to be in accordance with the immediate cash need. In other words, you can take money in advance, but it should be only the amount you need, and you should take it within the shortest amount of time possible between when you can pay it back out.

Image 4. Summary of key requirements for receiving advanced payments



The idea for advance payments is that money comes into the organization in advance, but only for a *very short* amount of time. Consider it a "quick pass through" and out the door to the landlord, the property manager, etc.

Policies and procedures regarding advance payments must be transparent and clear; they must explain that the agency is doing the advanced payments in a way that meets the federal standards. The policies and procedures must clearly spell out that:

- The time elapsed from eLOCCS draw down to payment is minimal.
- The process and method of payment is crystal clear (electronic check, transfers of funds, etc.).
- The period of the advance is specified in the policies and procedures.

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• The kind of activity intended to be drawn down in advance is eligible for advance payments. A perfect and clear example is advance payments for rental assistance.

Monitoring advance payments

HUD may monitor advance payments. Review the <u>HUD Monitoring Handbook</u> <u>- Chapter 34, Exhibit 34.1</u> Some of the relevant HUD monitoring questions might include:

- When the organization/agency taking advance payments is not a state entity, does the advance payment minimize the time between the transfer of funds from the U.S. Treasury and actual disbursement for project costs (including indirect costs)?
- Are the advance payments limited to the minimum amount necessary?
- Are the advance payments timed to be in accordance with actual, immediate cash requirements to carry out the purpose of the approved project/program?
- Did the entity requesting the advance payment hold the payment longer than three business days (including payments to sub-recipients)?

Note: Holding advance payments longer than three business days is not a violation per se, but it is an initial screening measure to determine if further explanation is required.

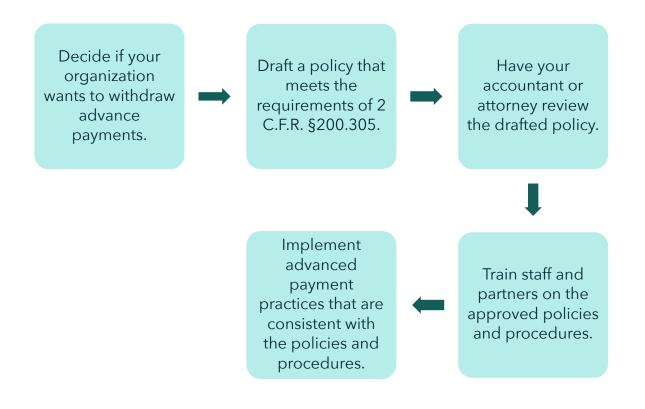
If an entity is going to hold the advance payment for longer than three days, they will need to be clear with their justification for the length of time and the policies and procedures will need to reflect that procedure in writing.

If the organization wants to withdraw advance payments, Image 5 describes the steps you should take to ensure you have the necessary policies in place.

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Image 5. Summary of steps to implement advanced payments





Managing CoC grants and adapting budgets under challenging circumstances

Having structures in place and a clear team responsible for responding to crises or unexpected changes in policies or funding can go far in setting your CoC-funded agency up to minimize the negative impacts. This section covers recommendations that agencies can put in place to help manage and adapt during challenging circumstances.

Key steps for CoCs

Assemble your team

First, assemble your team to consider the management of grants and budgets. The team should be a cross-sector of the organization, including both the program and the finance team. Bringing them together can enhance collaboration, help them become more aware of their different approaches and concerns, and better prepare the organization to respond to crises in a thoughtful, pragmatic, and cohesive way.

Who should staff program and finance teams?

The program team might include staff who oversee programs and activities of the CoC, including the HMIS lead, staff who act on behalf of the Collaborative Applicant or Administrative Entity, the Chair of the Board of the Executive Team, or partners/staff who oversee coordinated entry, outreach, prevention and problem-solving.

The finance team might include the Finance Director, Grants Administer, Chief of Operations.

Program team roles: Program team leaders need to be on top of the day-to-day functions of the organization but also have a responsibility to ensure that the systems and reporting is in place and timely. This facilitates drawing down funds in eLOCCS.

CoC-funded agencies should ensure the following:

- The information about the work on the ground is updated and documented consistently and regularly to enable quick draw down of funds.
- The timesheets and activity sheets (and other similar documents) are filed in a timely manner so that they can be used to support and justify draw downs.
- Program implementation is tracked and documented so that the agency leadership has insight into the implementation, which can directly impact budget line items.

Finance team roles: The Finance team needs to be current on the amount of the grant, how much has already been expended, and what expenses are still outstanding. To do so, they need to be analyzing on a regular basis budgets and grant expenditures to determine current draw down amounts and specific projects' future budget needs.

The finance team should also review the performance for all their CoC grants. The CoC will need to:

- Understand the specific grant amount.
- Track the amount already expended.
- Compare actual v. projected expenses.
- Answer the question: "Do we need to revise the budget based on this analysis?"
- Answer the question: "Will we meet expenditures if any renewal grants are not executed before the expiration of the current grant?"

Take immediate action

Second, the team representing both program and finance team members meet to take the following immediate actions:

- Ensure all eLOCCS accounts are current.
- Identify and set in place a back-up person to draw down funds from eLOCCS if/when the primary person is not available. *Note*: You cannot share

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passwords, so the additional staff person will need to have their own eLOCCS account and password.

- Be sure all staff know their respective roles.
- Be sure the agency's policies and procedures line up with the day-to-day practices of the team.
- Make sure documentation is in place and up to date to justify each time the draw is done.
- Determine if the agency will do advance payments.
- Determine a regular cadence for drawing down eLOCCS funds: weekly, monthly, quarterly, or some other plan. For example, some agencies will draw down from eLOCCS twice per month in conjunction with their payroll and then do another draw down for their monthly rental assistance, which allows them to always be caught up on their big costs.
- Look at EACH CoC-funded grant to review the period of performance. Consider the following questions:
 - If the grant will expire before the renewal grant agreements is signed, what are your plans?
 - Do you have plans to cover the gap?
 - For how long?
 - Where will the funds come from?
 - If there is a shortfall, has the Board discussed the potential funding gaps
 maybe even with the local HUD field office?

Establish routines that will occur as a normal part of the agency's regular functioning

Third, set up a system of routine analysis:

- Program/finance teams will need to meet either monthly or quarterly to review actual expenses against projected expenses.
 - Their analysis each time should reveal whether changes need to be made, a budget revision is needed, or a line item needs to be moved.
 - The comparison of actual v. projected expenses will need to be done throughout the grant period. It is not recommended to wait until the end of the grant period.



Homebase

• Program/finance teams should regularly discuss expenditures together and be prepared to take appropriate actions to adapt, as needed.

Plan for long-term analysis and action steps

Fourth, start to look forward and put into place a process for undertaking long-term analysis and action steps. It is important that both the program and finance team together does a regular, long-term health check for the CoC, to ensure the CoC is in a strong place to defend against potential uncertainties without putting the work, the staff, and clients at risk.

Recommendations for future planning include:

- Review the funding mix of the agency.
 - Do you have adequate funds outside of Federal resources (e.g., ESG, HOPWA, CDBG, HOME programs, and CoC funds may come through State, City or County, but they originate as federal dollars and can be impacted by federal decisions)?
 - What other funding resources are available and in use in the community that are not associated with federal funding?
 - Are there opportunities to diversify funding by leveraging other programs toward housing and homelessness? (e.g., Behavioral Health, Medicaid, Opioid reduction, or other funding.)
- Maximize state and local general funds.
 - Are there opportunities to leverage local general funds either state, county, or city dollars to address housing and/or homelessness?
 - Are there partnerships with agencies or community-based organizations in your locality that might be worth bringing together to seek joint funding opportunities?
 - Be sure local funders and state and local officials know about work you are doing and its impact so they can support it.
- Consider philanthropic resources.
 - Are there local funders to tap into? National foundations or philanthropic opportunities to explore?



- Build reserves during uncertain times.
 - Consider private funding sources that might be smaller but possibly helpful in times of uncertainty, such as Rotary Clubs or the faith-based community. These funds can help diversify a CoC's funding resources.

Organizational strategies for processing new information

Federal, state, county, and local funding to address homelessness can be greatly impacted by changes in policies, leadership, public perceptions, disasters, and the like. These events can destabilize staff who are already living with trauma and add extra layers of worry for clients who are experiencing acute vulnerability. This document offers guidance to organizations seeking to process the onslaught of new information and the potential impacts on staff and clients.

Create a Plan for Processing New Information

The current federal administration is making changes to many public benefit programs, including homeless systems of care, at unprecedented speeds. Major announcements are made with little warning and often leave many unanswered questions about the impact on direct services across the country. In the unstable environment, it is helpful to have an organizational plan for processing and responding to new information.

Create an internal crisis response team

A crisis response team can be responsible for processing and responding to a crisis. They can also be responsible for communicating with staff.

Who should staff a crisis response team?

A crisis response team is best when it includes senior leadership, financial management, and communications staff, at a minimum. Organizations may want to include other staff who are needed to understand the potential impact of new developments on staff and organizational programming (e.g., front line workers).

Homebase

Considerations for the team's scope include:

- The team should meet as frequently as needed when new developments are identified.
- The team should meet regularly (e.g., weekly, bi-weekly, etc.), including during times when there is no immediate need.
- In between new announcements, the team can focus on building the organization's resilience to the sudden loss of federal funding by:
 - o diversifying funding sources (e.g., local, state, private);
 - working with the Continuum of Care (CoC) to discuss contingency planning; and
 - anticipating and planning for financial solvency by ensuring necessary infrastructure and processes are in place so that the organization can leverage all its current resources.
- If applicable, consider modeling a crisis response team based on an organization's approach to the COVID-19 pandemic. What processes were created to ensure transparency and open communication? How were hard decisions made? How were those decisions communicated to staff?

Identify staff that are responsible for tracking new developments

Identify a few staff members who are responsible for keeping up to date on emerging news. Some considerations include:

- Staff members can primarily focus on trusted sources of information (e.g., major news sources, press releases from government offices, <u>National Alliance</u> to End Homelessness, <u>National Council of Non-Profits</u>).
- The organization can develop its own protocol to address how to rely on more informal news sources (e.g., X/Twitter, Bluesky, news shared by colleagues).
- Instruct staff on what topics to focus on (e.g., funding sources being used by the organization, impacts to HUD, developments that impact sub-populations of focus, changes to compliance requirements).
- Provide staff opportunities to move out of the information-tracking role, as needed. Processing the news in difficult times can be a challenging task and staff may need to take a break from the responsibility.



Consider pausing before acting

Sometimes in crisis, changes to government structures or policy can be announced without advance notice. Many of the changes might also be amended or rolled back, based on public opinion, politics, etc. There can be an advantage in waiting a few days before acting on new developments. Consider the following:

- Take the time needed to process information before reacting publicly or with staff.
- Reach out to trusted partners, including local leadership (e.g., CoC), to determine what steps other organizations are planning to take in response to news.

Communicate frequently, clearly, and transparently with all staff

Pausing before action does not mean pausing before communicating. During crisis, staff may assume the worst. Staff should be kept in the loop regarding new developments. Consider the following guidance on staff communication:

- Be transparent about what is known and where there is still uncertainty.
- Make it clear to staff what type of contingency planning is taking place (e.g., working with the CoC, seeking out alternative sources of funding).
- Make sure staff feel supported in communicating about programmatic or staffing changes with clients.
- Be strategic about what news needs to be shared with which staff members.
 - For example, if a major funding source for the organization is lost, it can be important to share that information with all staff. If a regulation is rolled back that only impacts one program, consider communicating directly with that team to prevent staff overwhelm (or communicate with impacted staff immediately and take time to assess before sharing with the entire staff).
- Do not let perfection be the enemy of the good in communications! Getting something out quickly can be more important than getting the messaging perfect.
- It is likely that there will be mistakes. Respond quickly once they are identified, be transparent, and remind staff that everyone is human.



Decide whether to act

If the organization plans to react, create a response plan that engages partners, the board of directors, funders, elected officials, the press, staff, and/or clients as necessary. The following steps can guide you:

- Assess the potential impact of the news on the organization, individual programs, staff jobs, and clients.
- Consider scenario planning to identify what the impacts of different actions may be on the organization.
- Be prepared with a risk management plan that looks at a range of scenarios.
- Make sure major decisions are communicated to staff transparently, clearly, and as quickly as possible.
- Offer opportunities for staff to connect with each other on a human level and discuss the uncertainty. Staff may also want opportunities to share approaches and challenges for working with clients in this context.

Additional Resources

- Campaign for Trauma Informed Policies and Practices, <u>Trauma-Informed</u> <u>Workplaces</u> (2023).
- Harvard Business Review, <u>How to Talk to Your Team When the Future is</u> <u>Uncertain</u> (2020).
- Leadership Magazine, <u>Trauma-informed leadership through all stages of crisis</u> (2019).
- McKinsey & Company, <u>A leader's guide: Communicating with teams</u>, <u>stakeholders</u>, and communities during COVID-19 (2020).



Communication with clients around uncertainty

Federal, state, county, and local funding to address homelessness can be greatly impacted by changes in policies, leadership, public perceptions, disasters, and the like. These events can destabilize clients who are already living with trauma. This document offers guidance to provider staff on how to have trauma-informed communication with clients during periods of uncertainty.

Key Principles of Trauma-Informed Care

Trauma-informed care is an approach to engage people with histories of trauma that recognizes the presence of trauma symptoms and acknowledges the role that trauma has played in their lives.

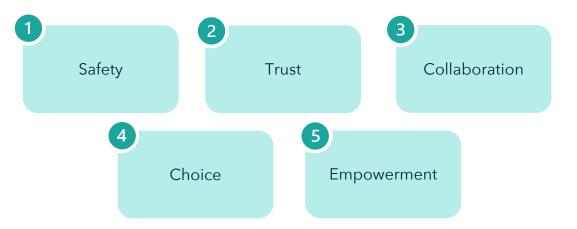


Image 6. Five key principles of trauma-informed care²

Staff can focus on their ability to support these principles in interactions with clients, even as external factors work against the principles. The following section includes a list of strategies to accomplish trauma-informed care in the context of uncertainty.

² For more information about the key principles, please see <u>What is Trauma Informed Care?</u>



Strategies for Trauma-Informed Care During Crisis

Check in with yourself and with other staff

Before speaking to clients, take time to acknowledge the impact the on-going uncertainty or new events is having on everyone. *You might be experiencing this moment as a trauma*. The uncertainty could have real impact on clients you support each day, your job security, the health of your organization, etc.

New information about the financial uncertainty of these programs could bring up all types of feelings – numbness, grief, dread, exhaustion, agitation, stress, irritability, anger, sadness, or something else entirely. There is no right way to feel during times of uncertainty. You may be even more deeply impacted if you have past experiences of trauma. It is unrealistic to expect yourself or anyone else to be fully okay.³

During this time, both individuals and organizations have care responsibilities:

- As an *individual*, take space for small and large acts of self-care during challenging moments. For example, this can look like doing a body scan before meeting with a client; postponing meetings; taking time off; or accessing organizational benefits like an Employee Assistance Program (EAPs), if available.
- Organizations also have a responsibility to provide opportunities for self-care for their employees by providing regular supervision, training, mental health benefits, variety in job duties, opportunities for peer support among staff, and a non-toxic workplace.

Attention to individual and organizational care is essential during this ongoing period of uncertainty to avoid potential burnout and secondary traumatic stress for staff.

Ask for clear guidance from organizational leadership

Do not interpret the news and potential impact on your programs and clients alone. Leadership from the organization should be offering clear, transparent, and frequent communication with staff about emerging updates and their potential impact. Rely on your Board of Directors and senior staff to help weather uncertain times.

³ <u>There is Nothing Wrong with You: Mental Health in the Face of Whatever This Is</u>. Lisa Kays. Accessed February 2025.



If your organization does not already have one in place, encourage leadership to establish a crisis response team and create a risk-management plan to respond to potential uncertainties.

Seek support from other staff and leadership

Conversations with clients about uncertainties can be extraordinarily painful. Conversations about changes to funding can be especially triggering for clients and staff with trauma. It is important for staff to debrief these experiences and seek support from colleagues, whenever possible.

If the experience of communicating these updates to clients gets overwhelming, work with leadership to implement strategies to reduce the workload (e.g., sending out program-wide updates to all clients, townhall meetings, group meetings). If one client needs a lot of support, work with leadership to identify a strategy for supporting that individual that does not all fall to a single staff member.

Center trauma-informed communication practices with clients

Staff at all levels can and should communicate with clients in trauma-informed ways. Predictable communication can be a stabilizing force in uncertain times. While each organization's specific approach may differ, there are some principles that are applicable across organizations. The following table covers suggested practices and useful phrases for each of the key principles outlined in the first section. *Note*: the following practices are best coordinated among staff across the organization, rather than independently by individual staff members.

Table 1. Practices and useful phrases for centering trauma-informed care in client conversations

Principle 1: Safety

Practices

- In periods of uncertainty, it's better to say something about impactful and emerging news than to say nothing.
- Make updates for clients consistently available and predictable.
- Alert staff when it's time to provide updates to clients, including any promised updates.
- If there is a large amount of information, consider sharing updates only about the most impactful things, but assure clients that they are welcome to reach out whenever they need an update.
- When possible, difficult news should be shared by staff members that have a strong personal relationship with the client.

Useful phrases

- "We aren't quite sure what this means yet, but we are figuring it out and will update you soon."
- "You can expect an update from us by [insert date]."
- "Please reach out if you have any questions. We might not have all the answers, but we'd be happy to talk to you."

Principle 2: Trust

Practices

- Be as transparent as possible.
- Provide clear information about what is known and unknown.
- Resist the urge to downplay the potential impact on clients, the program, or organization.
- Updates should be shared in plain language and accessible formats (e.g., using flyer or fact sheets).

Useful phrases

- "Here is what we know [insert]. There are also many things we aren't sure about yet, including [insert]."
- "This could mean [insert]. We are here to help you figure out what comes next."
- "I don't know. But I can try to find out and get back to you."

Principle 3: Cultural Responsiveness

Practices

- Communication plans are best when they consider differences in experience by identity groups. For example, undocumented clients may require more support to access resources that match their eligibility.
- Communications with clients should acknowledge the hardships.
- Offer multiple modalities of communication (e.g., email, townhall, one-on-one meetings).
- Make updates accessible in multiple languages.

Useful phrases

- "This is a bad situation, and I wish it wasn't happening."
- "I understand this may be hard to hear. Do you want to talk about how you are feeling?"

Principle 4: Collaboration

Practices

- Reassure clients that they are not alone, and that the agency will do everything possible to protect the impacted programs and/or people.
- Create space for clients to offer ideas and support to staff and each other.
- Ensure clients have a clear point of contact for questions.
- Tell clients what actions are being taken by the CoC and organization to plan for contingencies.

Useful phrases

- "We are here for you, and we are doing everything possible to [insert]."
- "Would it be helpful to talk to other folks who are impacted? [If yes], We can work on setting up a space for you all to meet."



Principles 5 and 6: Empowerment and choice

Practices

- Give clients the opportunity to opt out of updates, with exceptions for things like major changes to the program(s) they participate in.
- Be pragmatic with helping clients prepare for an uncertain future, without causing a panic. For example, clients with a higher acuity might need more support planning for what comes next (e.g., another subsidy program). Clients in rapid re-housing might be able to prepare for this from the beginning by selecting more affordable units and engaging in planning with their case managers.

Useful phrases

- "If hearing about these updates is too hard, let me know, and I can make sure you only receive the most important information."
- To a newer client "Funding for this program might go away. If that happened, [organization] could no longer support with rent payments. Would you be able to take care of yourself if anything were to happen now? [If not] Can we do some planning for what steps you might take if that happens?"