

FY2022 HUD CoC Program and Supplemental Notices of Funding Opportunities

FY2022 HUD CoC Program and Supplemental Notices of Funding Opportunities Instructions for Letters of Justification

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INTRODUCTION

In FY22, the U.S. Dept. of Housing and Urban Development (HUD) released two Notices of Funding Opportunity (NOFO).

- ❖ **The Continuum of Care (CoC) Program NOFO:** The annual funding competition to renew existing HUD CoC Program Grants and to apply for new programs under the CoC Permanent Housing Bonus and Domestic Violence Permanent Housing Bonus, and the
- ❖ **Unsheltered Supplemental NOFO:** The purpose of this special NOFO is to target efforts to reduce unsheltered homelessness, particularly in communities with very high levels of unsheltered homelessness and homelessness in rural areas. Through this Special NOFO, HUD will award funding to communities to implement coordinated approaches - grounded in Housing First and public health principles - to reduce the prevalence of unsheltered homelessness, and improve services engagement, health outcomes, and housing stability among highly vulnerable unsheltered individuals and families. HUD expects applicant communities to partner with health and housing agencies to leverage mainstream housing and healthcare resources. The District is eligible for about \$14.6 million through this opportunity.

In response to each NOFO, TCP is required to submit a Project Listing to HUD – a ranked ordering of all programs seeking (renewal or new) funding through a particular Opportunity. The ranking is determined by the DC Interagency Council on Homelessness's Ranking Committee, an group of non-conflicted stakeholders who will decide which project applications to include in response to both NOFOs and in which order both slates of projects will be ranked.

The information in the Justification Letters provides your agency with the opportunity to communicate qualitative information about the program (either existing or proposed) to the Ranking Committee as they make their decisions. The Ranking Committee will use this information and your other application materials to inform their decision. For programs renewing funding, the Ranking Committee will also review program performance data as documented in the DC HMIS or an HMIS comparable database.

Justification Letters, coversheets, application forms (submitted via the Excel template for TCP grantees or via e-snaps for HUD direct grantees), and match source documentation should be submitted via smartsheets here: ([FY22 HUD NOFO Project Application Submission \(smartsheet.com\)](#)) or emailed to tfredericksen@community-partnership.org by the due dates indicated below.

For the CoC NOFO: all application materials must be received by **August 26, 2022**.

-Projects renewing existing CoC Program grants should submit, using one of the two options above, the Justification Letter, coversheets, and match source documentation. Renewing projects need only submit an application form in 2022 if they would like to update their application from last year. If your agency wishes to re-

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submit your 2021 CoC NOFO application “as is”, please confirm that via email (to tfredericksen@community-partnership.org) by August 26, 2022. If your agency would like to make changes to the application from 2021 please contact TCP for next steps. (Note: Projects previously funded under the Youth Homelessness Demonstration Project have additional materials to submit which have been provided to those agencies by TCP.)

-Agencies that are applying for new CoC NOFO funding under either CoC Permanent Housing Bonus or the Domestic Violence Permanent Housing Bonus must submit the application materials, using one of the two options noted above, including the application form (Excel Template), Justification Letter, coversheets, and match source documentation by August 26, 2022.

For the Unsheltered Supplemental NOFO, providers must indicate their intention to apply by **September 20, 2022** and send your final application materials no later than September 30, 2022. Application materials include the application form (Excel Template), Justification Letter, coversheets, and match source documentation. These may be submitted using one of the two options noted above.

NOTE: The Ranking Committee will not consider project application packages that are missing any materials.

SECTION A: REQUIREMENTS FOR LETTERS OF JUSTIFICATION

Letters of justification narrative must address all requirements in Section A.

A.1. Service Requirements: Provide a description that addresses each item below for the proposed project

A.1.a. Ending Homelessness for All Persons/Unsheltered Homelessness:

CoC NOFO: Project applicants must demonstrate how their renewing or proposed projects move the needle on the goals and objectives in Homeward DC and Solid Foundations DC by continuing or creating interventions that reduce the number of individuals and families experiencing sheltered or unsheltered homelessness in the District.

Unsheltered NOFO: The Unsheltered Supplemental NOFO provides new funding for specifically intended to help our community address unsheltered homelessness. Project applicants will propose new street outreach or permanent housing programs and must demonstrate how those projects fill gaps in the system that will help the CoC reduce the number of people experiencing unsheltered homelessness.

A.1.b. Advancing Equity and Intersectional Equity

CoCs must describe how the CoC analyzed whether any disparities are present in the provision or outcomes of homeless assistance; what disparities the CoC identified in the provision or outcomes of homeless assistance; what steps the CoC is taking to address the disparities identified in the provision or outcomes of homeless assistance; and What measures the CoC has in place to track progress on preventing or eliminating disparities in the provision or outcomes of homeless assistance. Any actions taken must be consistent with federal nondiscrimination requirements.

- Project applicants must describe the any such work undertaken to address disparities in renewing projects and/or steps taken to ensure proposed projects consider equity their design.

A.1.c. Using a Housing First Approach

CoCs must demonstrate that project applications for housing programs submitted are using the Housing First approach by providing low barrier projects that do not have service participation requirements or preconditions to entry and prioritize rapid placement and stabilization in permanent housing. This means the projects allow entry to program participants regardless of their income, current or past substance use, history of victimization (e.g., domestic violence, sexual assault, childhood abuse), and criminal record—except restrictions imposed by federal, state, or local law or ordinance (e.g., restrictions on serving people who are listed on sex offender registries). CoCs must describe what tools and methods are used to regularly evaluate projects to ensure those that commit to following a Housing First approach are maintaining fidelity to a housing first approach in implementing their

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project which must include a process to review fidelity to a Housing First approach outside of the local CoC competition rating and ranking process. Project applicants must describe how their renewing and proposed projects align with the Housing First approach.

Commitment to the core components of Housing First:

- Few to no programmatic prerequisites to permanent housing entry – People experiencing homelessness are offered permanent housing with no programmatic preconditions such as demonstration of sobriety, completion of alcohol or drug treatment, or agreeing to comply with a treatment regimen upon entry into the program. People are also not required to first enter a transitional housing program in order to enter permanent housing.
- Low barrier admission policies – Permanent supportive housing’s admissions policies are designed to “screen-in” rather than “screen-out” TAYs with the greatest barriers to housing, such as having no or very low income, poor rental history, past evictions, or criminal histories. Housing programs may have tenant selection policies that prioritize people who have been homeless the longest or who have the highest service needs as evidenced by vulnerability assessments or the high utilization of crisis services.
- Rapid and streamlined entry into housing – Many people experiencing chronic homelessness may experience anxiety and uncertainty during a lengthy housing application and approval process. In order to ameliorate this, Housing First permanent supportive housing models make efforts to help people experiencing homelessness move into permanent housing as quickly as possible, streamlining application and approval processes, and reducing wait times.
- Supportive Services - Services are voluntary, but can and should be used to continually engage tenants to ensure housing stability - Supportive services are proactively offered to help tenants achieve and maintain housing stability, but tenants are not required to participate in services as a condition of tenancy. Techniques such as harm reduction and motivational interviewing may be useful. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-judgmental communication while motivational interviewing may be useful in helping households acquire and use new skills and information.
- Tenants have full rights, responsibilities, and legal protections – The ultimate goal of the Housing First approach is to help people experiencing homelessness achieve long-term housing stability in permanent housing. Permanent housing is defined as housing where tenants have leases that confer the full rights, responsibilities, and legal protections under Federal, state, and local housing laws. Tenants are educated about their lease terms, given access to legal assistance, and encouraged to exercise their full legal rights and responsibilities. Landlords and providers in Housing First models abide by their legally defined roles and obligations. For instance, landlords and providers do not enter tenants’ apartments without tenants’ knowledge and permission except under legally-defined emergency circumstances.
- Practices and policies to prevent lease violations and evictions – Housing First supportive housing programs should incorporate practices and policies that prevent lease violations and evictions among tenants.

A.1.d. Improving Assistance to LGBTQ+ Individuals

CoCs must demonstrate efforts to address the needs of the LGBTQ+ population. CoC must: demonstrate LGBTQ+ serving organizations or advocacy groups are included in the CoC membership; annually conduct training to providers about how to effectively implement the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Rule, and the Equal Access in Accordance with an Individual’s Gender Identity in Community Planning and Development Programs Rule; demonstrate that they have implemented and trained

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providers on a CoC-wide, anti-discrimination policy ensuring that LGBTQ+ individuals and families receive supportive services, shelter, and housing free from discrimination; demonstrate that their CoC-wide, anti-discrimination policy is updated, as necessary based on stakeholder feedback; demonstrate that the CoC has assisted providers in developing agency anti-discrimination policies that are consistent with the CoC-wide anti-discrimination policy; and demonstrate that the CoC has a process for evaluating compliance with the CoC's anti-discrimination policies and addresses any non-compliance with those policies.

A.1.e. Improving System Performance

CoCs should be using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, rates of exit to permanent housing destinations) to determine how effectively they are serving people experiencing homelessness. Additionally, CoCs should use their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing, and services to ensure people experiencing homelessness receive assistance quickly, and make homelessness assistance open, inclusive, and transparent. CoCs should review all projects eligible for renewal in FY 2022 to determine their effectiveness in serving people experiencing homelessness, including cost-effectiveness. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies. HUD recognized the effects of COVID-19 on CoC performance and data quality and reduced the points available for rating factors related to system performance in the FY 2021 CoC NOFO. This FY 2022 CoC NOFO significantly increases the points available for system performance rating factors. Applicants must describe how they use HMIS and other internal performance data to evaluate programs and ensure services meet the needs of client served as well as the objectives of the CoC.

A.1.f. Partnerships with Health Care Agencies

The CoC must coordinate with state and local public health agencies to respond to and prevent infectious disease outbreaks amongst people experiencing homelessness. The CoC must demonstrate: that the CoC effectively collaborates with state and local public health agencies to develop CoC-wide policies and procedures to respond to and prevent infectious disease outbreaks among people experiencing homelessness; and that the CoC effectively shares information related to public health measures and homelessness and facilitates communication between public health agencies and homeless service providers to ensure street outreach providers and shelter and housing providers are equipped to prevent or limit infectious disease outbreaks among program participants.

Applicants must demonstrate that they work closely with public and private healthcare organizations and assist program participants to receive primary care, receive housing-related services, and obtain medical insurance to address healthcare needs. This includes developing close partnerships with public health agencies to analyze data and design approaches that reduce homelessness, improve the health of people experiencing homelessness, and prevent and address disease outbreaks, including HIV/AIDS.

A.1.g. Trauma Informed Services:

Trauma occurs when an individual is exposed directly or indirectly to an overwhelming event or experience that involves a threat to one's physical, emotional, and/or psychological safety. Homelessness itself is a traumatic event, and individuals experiencing homelessness are particularly vulnerable to injury, accident, trafficking, survival sex, and assault. The experience of trauma, both before and during episodes of homelessness, is extremely common. CoC data including the Point in Time count and Women's Needs Assessment indicate that many homeless individuals have experienced physical and/or sexual assault during their current episode of homelessness. Symptoms of past and present trauma can create barriers and challenges for individuals and the service providers working with them. Providers are required to describe their expertise and experience delivering trauma informed services for the program being renewed.

A.1.h. Clinical Services:

Providers must ensure that licensed supervision is provided for all staff providing direct clinical services to clients in their programs, and that basic training is provided to all staff. For the purposes of this competition, "clinical services" means mental health services, substance abuse treatment services, and medical services. Certifications

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for licensed supervision includes Licensed Independent Clinical Social Worker (LICSW), master's level Licensed Professional Counselor (LPC), or registered nurse, licensed psychologist. Providers must describe their clinical approach for the program being renewed.

A.1.i. Providing Services to Specific Subpopulations

Providers submitting project applications proposing to serve any specific populations (e.g. households experiencing chronic homelessness, veterans, youth, LGBTQ+ persons, etc.) must demonstrate experience providing housing, supportive services, survivor services, and/or mental health services to these populations. They must demonstrate their ability to services in a culturally competent way and how their service model will address the unique needs of this population.

A.1.j. CAHP Participation:

Coordinated Assessment and Housing Placement (CAHP) is the standardized access and assessment for all individuals, through a coordinated referral and housing placement process to ensure that people experiencing homelessness receive appropriate assistance with both immediate and long-term housing and service needs. Providers submitting project applications should articulate their commitment to participating in CAHP and, for new projects, their plan for participation.

SECTION B: INSTRUCTIONS FOR APPLICATION AND FORMAT FOR LETTERS OF JUSTIFICATION

These instructions contain the required content and format for providers to submit letters of justification. Providers must adhere to these instructions, including page limitations. All narratives should be formatted as described below within the given page limits.

Providers must submit separate letters of justification for each project application submitted for consideration.

B.1. Coversheet

Providers must complete coversheet and submit along with their letters of justification. Letters of justification that do not include the coversheet are incomplete and will not be considered by the Ranking Committee.

B.2. Narrative Response Formatting Requirements:

Letters of justification must adhere to the following format requirements:

- A. Page Size: 8.5" x 11"
- B. Margins: one-inch all around
- C. Font: Arial
- D. Font (regular text): 10 point
- E. Font size/style for headings: 12 point, Bold. (subheadings - 11 point, Bold.)
- F. Spacing: Double-spaced
- G. Headers: Left-justified
- H. Footers: Left-justified - name of applicant. Right-justified - page number out of total pages. (ex. Page 1 of 3)
- I. Letters must be submitted as a Portable Document Format (PDF) file electronically via email attachment.

B.3. Page Limit:

B.3.a. Page Limit:

Letters must respond to all parts of Section A of this document. Providers may provide information on program performance and/or other information to help the Ranking Committee better understand their programs. Letters will be a maximum of six pages and must comply with the following formatting requirements in Section D. The coversheet is not included in the page limit. **Any responses after page six will not be considered by the Ranking Committee for this competition.**

B.3.a. Exhibits and Attachments

Exhibits and attachments are not requested and will not be considered.

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B.4. Submission

Materials must be sent via email to rfp@community-partnership.org and received by the closing date and time.

SECTION C: REFERENCE DOCUMENTS

- Opening Doors – The Federal Strategic Plan to End Homelessness: <https://www.usich.gov/opening-doors>
- Homeward DC – The District’s Strategic Plan to End Homelessness: <http://ich.dc.gov/page/homeward-dc-ich-strategic-plan-2015-2020>
- HUD Rapid Rehousing Overview: <https://www.hudexchange.info/resources/documents/Rapid-Re-Housing-Brief.pdf>
- HUD Rehousing as a Model and a Best Practice: <https://www.hudexchange.info/news/snaps-in-focus-rapid-re-housing-as-a-modeland-best-practice/>
- HUD Rapid Rehousing for Youth: <https://www.hudexchange.info/homelessnessassistance/resources-for-homeless-youth/rrh-models-for-homeless-youth/>
- HUD Rapid Rehousing for Survivors of Domestic Violence: http://www.endhomelessness.org/files/2680_file_Home_Free_Best_Practice_Write_Up.pdf
- USICH Rapid Rehousing Overview: <https://www.usich.gov/solutions/housing/rapid-rehousing>
- USICH The Core Principles of Housing First and Rapid Rehousing: <https://www.usich.gov/tools-for-action/webinar-core-principles-of-housing-firstand-rapid-re-housing>
- USICH Rapid Rehousing Training Tools: <https://www.usich.gov/tools-for-action/rapid-rehousing-online-training-parts-1-and-2>
- HUD Housing First in Permanent Supportive Housing: <https://www.hudexchange.info/resources/documents/Housing-First-PermanentSupportive-Housing-Brief.pdf>
- USICH Implementing Housing First in Permanent Supportive Housing: https://www.usich.gov/resources/uploads/asset_library/Implementing_Housing_First_in_Permanent_Supportive_Housing.pdf
- HUD Coordinated Entry Policy Brief: <https://www.hudexchange.info/resources/documents/Coordinated-Entry-PolicyBrief.pdf>
- HUD Creating a Systemic Response to Homelessness: <https://www.hudexchange.info/news/coc-competition-focus-creating-a-systemic-response-to-homelessness/>
- HUD Ending Youth Homelessness: <https://www.hudexchange.info/news/coc-competition-focus-fy-2016-policy-priority-to-end-youth-homelessness/>
- USICH Preventing and Ending Youth Homelessness: A Coordinated Community Response: https://www.usich.gov/resources/uploads/asset_library/Youth_Homelessness_Coordinated_Response.pdf
- HUD NOFA Page: <https://www.hudexchange.info/programs/e-snaps/fy-2018-coc-program-nofa-coc-program-competition/#nofa-and-notices>
- TCP’s Policy on Serving Transgender and Gender Nonconforming Clients: http://community-partnership.org/literature_126519/Transgender_Gender_Nonconforming.mp3