2023 HUD CoC Program Notice of Funding Opportunity (NOFO)

DISTRICT OF COLUMBIA CONTINUUM OF CARE
Continuum of Care
Continuum of Care (CoC)

- Per HUD, a CoC is a planning body that establishes a community’s strategic vision to respond to homelessness in that jurisdiction.
- CoC may also refer to the network of homeless services providers in a given community.
- The CoC Program is the HUD funding stream associated with this competition (as distinct from ESG, HOPWA, HOME, etc.). The HUD Continuum of Care (CoC) Program is the primary source of federal funding supporting the community’s efforts to prevent and end homelessness. The CoC Program is designed to:
  - Promote a communitywide commitment to the goal of ending homelessness;
  - Provide funding to support efforts by nonprofit providers and state and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused by homelessness; and
  - Promote access to and effect utilization of mainstream programs by homeless individuals and families.
Roles and Responsibilities
2023 HUD CoC Competition

Roles and Responsibilities:

• **The Community Partnership (TCP)** is the District’s Collaborative Applicant and HMIS Lead, it is responsible for: 1.) Assembling and submitting the Consolidated Application; 2.) Conducting community informational sessions about the NOFO and opportunities for new funding; 3.) Soliciting Project Applications for “bonus” funding opportunities; 4.) Providing technical assistance to providers submitting new and renewal Project Applications; and 5.) Providing the Ranking Committee with HMIS and other data and information needed to finalize the Project Ranking.

  *As the Collaborative Applicant, TCP is the direct recipient of all new awards made under the CoC Program.*

• **The Interagency Council on Homelessness (ICH) Committee Structure** is the Continuum of Care (CoC) and is the strategic planning body for the District’s Homeless Services System. It is responsible for 1.) Setting the community’s strategic vision for the implementation of the CoC and the allocation of new resources; 2.) Providing oversight to the Collaborative Applicant to ensure all parts of the Consolidated Application align with Homeward DC and Solid Foundations DC -the District’s strategic plan to end homelessness; and 3.) Assembling a Ranking Committee of non-conflicted community stakeholders.
2023 HUD CoC Competition

Roles and Responsibilities:

• **The Ranking Committee** is tasked with conducting the project ranking of all projects seeking new or renewal funding. The Ranking Committee will prioritize grants based on 1.) Performance data; 2.) Supplemental narrative information submitted by project applicants; and 3.) How closely each project aligns with HUD’s funding priorities and the District’s strategic plan to end homelessness.

  The Ranking Committee must be made up of non-conflicted community stakeholders – meaning members of the Ranking Committee cannot come from government agencies or service providers seeking new or renewal funding in the competition.

• **Project Applicants** are the individual providers submitting new and renewal Project Applications for funding. Project applicants are responsible for putting together complete and competitive applications that increase the overall quality and competitiveness of the Consolidated Application.

• **HUD** makes final decisions about funding.
2023 HUD CoC Competition

Timeline:

• July 5, 2023: 2023 NOFO Released
• July 20, 2023: Meeting with DCCADV and the DV Providers about the DV Bonus
• July 28, 2023: All Provider Meeting and Informational Session
• July 31, 2023: TCP will notify renewing applicants of their preliminary ranking
• Project Application Training Dates:
  ◦ (Bonus Applications) August 2, 2023, 11:00am to 1:00pm
  ◦ (Renewing TCP Subgrantees) August 3, 2023 12:30pm to 2:30pm
  ◦ (Renewing TCP Subgrantees) August 4, 2023 12:00pm to 2:00pm
  ◦ (Renewing Direct Grantees) August 7, 2023, 12:00pm to 2:00pm
• August 14, 2023: New Project Applications and Justification Letters Due to TCP
• August 21, 2023: Renewal Project Applications and Justification Letters Due TCP
• September 13, 2023: TCP will notify all project applicants about whether their application has been accepted by the CoC and their final Project Ranking
• September 28, 2023: Consolidated Application Package Due to HUD
Project Applications by Type
**2023 HUD CoC Competition**

- **Renewal Project:** A renewal project application seeks to renew an existing HUD CoC Program-funded grant “as-is.” Meaning with no major changes to the scope of work, population served, or anything else requiring a grant amendment or modification.

- **New Project (Reallocation):** Reallocation is a process that CoCs may use to shift funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC’s annual renewal demand. Only permanent housing programs may be created through reallocation:
  - Joint TH-RRH
  - Rapid Rehousing
  - Permanent Supportive Housing
2023 HUD CoC Competition

**New Project (Bonus):** The NOFO includes two opportunities to apply for new funding to bring new programs online:
- The CoC Bonus, and
- Domestic Violence Bonus

**Expansion Project (Bonus):** Expansion projects allow existing HUD CoC-funded programs to apply for additional resources to expand their projects. Renewing project applicants must submit a new project application to add funds to a project to expand its current operations by adding units, beds, persons served, or services provided to existing program participants. DV Bonus funds can only be used to expand an existing renewal project if the expansion project is dedicated to survivors of domestic violence, dating violence, sexual assault, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act; however, as explained in section I.B.3.I of the NOFO, only the new project application for the expansion will be considered for DV Bonus funds, and HUD will only select a new DV Bonus project that expands an existing renewal project in Tier 1 or 2. For projects that are expanding their current CoC Program-funded project, project applicants must submit:

(a) the renewal project application that will be expanded; and
(b) a new project application with expansion information.
Bonus Funding Opportunities
2023 HUD CoC Competition

Bonus Opportunities by Type:

• CoC Bonus: A new project created to serve eligible households experiencing homelessness in the District.

• Domestic Violence Bonus: A new project that is dedicated to eligible households who are survivors of domestic violence, dating violence, sexual assault, or stalking and who are experiencing homelessness in the District.
2023 HUD CoC Competition

Eligible Bonus Projects:

• CoC Bonus: **approx. $1.2 million**
  ◦ Rapid Rehousing
  ◦ Joint TH-RRH
  ◦ Permanent Supportive Housing
  ◦ Coordinated Entry
  ◦ HMIS

• Domestic Violence Bonus: **approx. $2 million**
  ◦ Rapid Rehousing
  ◦ Joint TH-RRH
  ◦ Coordinated Entry
HUD Threshold Requirements
2023 HUD CoC Competition

**HUD Threshold Requirements:** HUD will review all projects to determine if they meet the eligibility threshold requirements on a pass/fail standard.

In order to ensure its Consolidated Application is competitive as possible, the CoC must conduct a similar review of project applications prior to submission to HUD.

If HUD or the CoC determines that the applicable standards are not met for a project, the project will be rejected.

**Approval of new and renewal projects is not a determination by HUD, TCP, or the CoC that a recipient or subrecipient is compliant with applicable fair housing and civil rights requirements.**
1. Project applicants must meet the eligibility requirements of the CoC Program as described in 24 CFR part 578 and provide evidence of eligibility required in the application (e.g., nonprofit documentation).

2. Project applicants must demonstrate the financial and management capacity and experience to carry out the project as detailed in the project application and the capacity to administer federal funds. Demonstrating capacity may include a description of the applicant/subrecipient experience with similar projects and with successful administration of SHP, S+C, or CoC Program funds or other federal funds.

3. Project applicants must submit the required certifications as specified in this NOFO.

4. The population to be served must meet program eligibility requirements as described in the Act, 24 CFR part 578.

5. Project applicants must agree to participate in a local HMIS system. However, in accordance with Section 407 of the Act, any victim service provider that is a recipient or subrecipient must not disclose, for purposes of HMIS, any personally identifying information about any client. Victim service providers must use agree to participate in a HMIS comparable database.
HUD Policy Priorities
HUD Policy Priorities: HUD establishes policy priorities for each funding competition. Project applications must align with these priorities and the local strategic plan to end homelessness. The 2023 CoC Program NOFO sets the following policy priorities:

1. Ending Homelessness for All Persons
2. Use a Housing First Approach
3. Reducing Unsheltered Homelessness
4. Improving System Performance
5. Partnering with Housing, Health, and Service Agencies
6. Race Equity
7. Improving Assistance to LGBTQ Individuals
8. Including People with Lived Experienced in the Local Planning Process
9. Increasing Affordable Housing Supply
Other Requirements
Equal Access in Accordance with an Individual's Gender Identity: On September 21, 2016, HUD published a final rule in the Federal Register entitled "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs." Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity in programs and shelter funded under programs administered by HUD's Office of Community Planning and Development (CPD). This includes projects funded by the HUD CoC Program.

In order to comply with the Equal Access Final Rule, TCP has established a written Policy on Serving Transgender and Gender Nonconforming Clients. If awarded, a project applicant will be required to comply with this policy.
2023 HUD CoC Competition

**Match Requirement**: HUD CoC Program funding is limited and can provide only a portion of the resources needed to successfully address the needs of homeless families, individuals, and youth. Meaning, HUD does not intend to be the sole support of any project that it funds. Therefore, HUD requires Project Applicants to have other sources of funding.

HUD CoC Program grants must be matched in an amount equal to 25% of grant funds. Match resources may come from public or private sources. All costs paid for with matching funds must be for activities that are eligible under the CoC Program, even if the recipient is not receiving CoC Program grant funds for that activity.
2023 HUD CoC Competition

Sources of Match:

• Cash: any funds that come from private or public resources (as long as they are not statutorily prohibited from being used as match/leverage).

• In-kind: services (counseling, legal advocacy, etc.), physical goods/equipment (food, furniture, clothing, etc.), and real property (land or buildings).

Resources provided directly to and for program participants are not eligible as allowable sources of match. For example:

• **Not Allowable:** Mainstream benefits provided directly to program participants (e.g., SSI/SSDI disability benefits) cannot be used as match/leverage.

• **Allowable:** Funds from mainstream resources provided directly to an organization for use in a CoC project (e.g., Medicaid dollars used to pay for services) can be used as match.

PLEASE NOTE: Commitments of land, buildings, and equipment are one-time only and cannot be claimed in more than one competition. For example, real property claimed as match in the 2021 competition cannot be claimed in subsequent competitions.
2023 HUD CoC Competition

Environmental Review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards.
Site Control Verification: For new projects where funds are awarded for leasing, rental assistance, operating, and/or supportive services grantees must demonstrate site control within 12 months of the announcement of the award.

Acceptable evidence of site control is a deed, lease, or purchase agreement.

If a grantee fails to gain site control by the deadline, HUD has the right to withdraw funding for the project.
2023 HUD CoC Competition

**Homeless Management Information System (HMIS):** Programs funded by the HUD CoC Program are required to use the homeless services system’s HMIS to comply with all HUD reporting requirements.

As HMIS lead for the CoC, TCP provides access to the HMIS and training on a monthly basis so that providers understand the requirement and data entry standards.
2023 HUD CoC Competition

**HMIS Comparable Database**: The Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) contain strong, legally codified confidentiality provisions that limit victim service providers from sharing, disclosing or revealing victims’ personally identifying information, including entering information into the HMIS. These provisions underpin confidentiality practices that protect the safety and privacy of victims of domestic violence, dating violence, sexual assault, stalking, and/or human trafficking who are seeking services.

Based on VAWA requirements, HUD CoC subrecipients that are victim service providers are prohibited from entering personally identifying information into the HMIS. However, they are not exempt from complying with HUD and CoC reporting requirements.
HMIS Comparable Database (cont.): An HMIS comparable database is a database that has all of the following characteristics:

• The provider controls who can access and see client information.
• Access to the database is controlled by the provider.
• The database meets the standards for security, data quality and privacy of the HMIS.
• The database complies with all HUD-required technical specifications.
• The database is programmed to current HMIS Data Standards.
• The database has the functionality to de-duplicate client records within each system.
• The database is able to generate all reports required by HUD.
• Data fields must be able to be modified and customized.
Reporting Requirements: If awarded, Project Applicants will be required to fulfill a number of HUD and CoC-level reporting requirements. This includes but is not limited to the following:

- Provide all information required to submit a Project Renewal Application to renew funding via the annual HUD CoC Program funding competition, including performance data necessary for project ranking.
- Submit all financial and program information required to submit an Annual Performance Report (APR) at the end of each grant cycle.
- Submit client level data necessary for the completion of the annual Point in Time (PIT) enumeration (DV providers will submit de-identified data).
- Submit client level data necessary for the completion of the annual Homeless Youth Census (HYC) (DV providers will submit de-identified data).
- Submit data needed to complete the Weekly Occupancy Report, including: program capacity, program vacancies, slots held for placement, number of enrollments, number of exits, number of exits to permanent destinations.
Coordinated Entry Participation: If awarded, Project Applicants will be required to participate in the CoC’s coordinated entry process, referred to locally as Coordinated Assessment and Housing Placement (CAHP).

- TCP’s CAHP team will make referrals into the program as vacancies arise.
- Program participants are prioritized based on a uniform assessment which matches their service and housing needs to available programs.
Ranking
Ranking

• **HUD requires that new and renewing project applications are submitted in a ranked order.**

• The Ranking signals to HUD what the community priorities are for which programs they should fund if they are not able to fund our entire request.

• The Ranking must include a combination of quantitative and qualitative factors and should include project threshold criteria, performance, and other objective criteria.

• **Each year, ICH convenes a Ranking Committee which conducts the project ranking of all projects seeking new or renewal funding.** The Ranking Committee will prioritize grants based on 1.) Performance data; 2.) Supplemental narrative information submitted by project applicants; and 3.) How closely each project aligns with HUD’s funding priorities and the District’s strategic plan to end homelessness.

• The Ranking Committee must be made up of non-conflicted community stakeholders – meaning members of the Ranking Committee cannot come from government agencies or service providers seeking new or renewal funding in the competition.
Ranking

• The Ranking is divided by HUD into two, financial threshold tiers.

• Within each tier, projects are also numerically ranked so HUD know which are the highest and lowest priority within each tier.
  ◦ Tier 1:
    ◦ The projects the CoC is prioritizing to receive funding
    ◦ Approx $25.2M
  ◦ Tier 2:
    ◦ The projects HUD will fund, once Tier 1s are funded depending on funding availability and the strength of the Consolidated Application
    ◦ Amount TBD*

• Within each tier, projects are also numerically ranked so HUD know which are the highest and lowest priority within each tier.

• *HUD provides CoCs with exact figures but has not as of today.
Ranking Committee Responsibilities

• Review Project Application materials from **renewing** grantees to determine whether applications should be:
  • included in the Consolidated Application,
  • be included but reduced, or
  • rejected

• Review Project Application materials from applicants for **new funding** - applying under both Bonus opportunities as well as any expansion or consolidation requests - to determine whether they should be:
  • included in the Consolidated Application,
  • included but reduced/modified, or
  • rejected

• Score **new and renewing** Project Applications to determine the ranked (priority) order of applications in the Consolidated Application
Ranking Committee Responsibilities

• For **renewing** grants, the Ranking Committee will use a combination of past performance data, supplemental narrative information provided by Project Applicants, and the HUD Policy Priorities to score/rank applications.
  • Performance data will come from HMIS/HMIS Comparable Databases, covering the period July 2022-June 2023.

• The Ranking Committee will select application(s) for **new** funding using a combination of community feedback on program types/populations in need or resources, the HUD Policy Priorities, and application materials to score/rank the applications.

• New and renewing applicants will be notified about whether or not their application will be included in the Consolidated Application as well as their rank no later than September 13, 2023.

• The decision about whether or not any project receives funding is solely up to HUD.
# Ranking Criteria

<table>
<thead>
<tr>
<th>HUD Ranking Criteria Categories</th>
<th>Objective Criteria (33%)</th>
<th>Performance Criteria (20%)</th>
<th>Threshold Criteria (47%)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Utilization Rate (%)*</td>
<td>Exits to Permanent Destinations (TH/RRH only)*</td>
<td>Provides services to a key subpopulation</td>
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<tr>
<td></td>
<td>% Grant Is Matched/Leveraged</td>
<td>Housing Stability (PSH only)*</td>
<td>Addresses vulnerabilities of persons served</td>
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<tr>
<td></td>
<td>Timely submission of Annual Performance Report (APR)/APR materials</td>
<td>Increase (TH/RRH) or Maintain (PSH) Income*</td>
<td>Commits to complete implementation of Housing First</td>
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<td></td>
<td>Spending Rate</td>
<td>% Returning to CoC after exit from Program*</td>
<td>Commits to CAHP Participation</td>
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<td></td>
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<td>Length of Stay</td>
<td>Commitment to federal policy priority(ies)</td>
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* Will be used for preliminary ranking
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