2024 HUD CoC Builds NOFO

Continuum of Care

Defining "Continuum of Care"

Per HUD, a Continuum of Care (or "CoC") is:

- A strategic planning body that sets a jurisdiction's vision to respond to homelessness in that community.

- The network of providers offering services to persons currently or formerly experiencing homelessness.

- The HUD CoC Program is also the name of the primary federal funding stream dedicated to preventing and ending homelessness.
  - It is designed to support a community's commitment to the goal of ending homelessness locally.
  - The HUD CoC program provides funding to nonprofit and governmental partners for the purposes of quickly rehousing persons experiencing homelessness while minimizing the trauma and dislocation caused by homelessness.
  - It is distinct from other HUD funding streams (e.g. HOPWA, ESG, HOME, etc.).
  - HUD CoC Program dollars are issued by HUD through regular Notices of Funding Opportunity (NOFOs)

Roles & Responsibilities

Defining Roles and Responsibilities

The Community Partnership (TCP):

- The Collaborative Applicant and HMIS Lead, TCP is responsible for:
  ◦ Assembling and submitting the Consolidated Application for CoC Program funding to HUD
  ◦ Conducting community info sessions about the NOFO
  ◦ Soliciting Project Applications for "bonus" funding opportunities
  ◦ Providing technical assistance to providers who are renewing funds or applying for new funding
  ◦ Providing the Ranking Committee with HMIS and other data to inform the Project Ranking

DC Interagency Council on Homelessness (ICH) Committee Structure

- The "Continuum of Care" (under the 1st definition noted on the previous slide); ICH is responsible for:
  ◦ Setting the community's strategic vision for use of the HUD CoC funding
  ◦ Works with TCP to ensure that the Consolidated Application aligns with that strategic vision
  ◦ Assembles the Ranking Committee

Defining Roles and Responsibilities

The Ranking Committee

- The Ranking Committee is tasked with articulating the community's funding priorities by selecting the applications that should be submitted to HUD for their review. To inform these decisions they:
  - Complete a threshold review to ensure the project is aligned with HUD's policy priorities and program requirements;
  - Review submitted applications, any requested supplemental information, and available quantitative and/or qualitative data to determine whether proposals meet CoC needs;
  - For the HUD CoC Program, they determine the ranked (priority) order of each project submitted to let HUD know which programs to fund first if HUD is unable to fund all requests (locally or nationally)

  No member of the ranking committee may represent an agency applying for HUD CoC Funding.

Project Applicants

- The entities submitting new or renewal funding "Project Applications". They are responsible for putting together complete and competitive project applications to for the Ranking Committee and HUD to consider.

HUD

- Issues the NOFO and makes the ultimate decision about whether a Project Application is funded.

CoC Builds

	CoC Builds
Funding Available (approx.)	$7.5 million
Eligible Program Types	Permanent Supportive Housing
Target Population	Households experiencing chronic homelessness at entry
Must Create a Brand New Program/Inventory	Yes
Funding uses	No more than 30% total for non capital costs; At least 70% should go to construction or rehab of units for physical housing space
Initial Grant Term	1-5 years
Renewable	Partially (Non capital costs only)
Application Format	Narrative only (25 pgs); TCP submits through grants.gov
Subject to HUD Threshold Criteria	Yes
Must Align with HUD/Local Policy Priorities	Yes
ICH approval before submission	Yes
Number of submissions allowed in response	1
Application materials due to ICH	October 10th
Applications due to HUD	November 21st

Funding Available & Eligible Program Types

CoC Builds NOFO:

- Approx. $7.5 million

- Must create a new Permanent Supportive Housing (PSH) program <u>and</u> physical housing space for program participants.

  ◦ PSH is permanent housing with supportive services that is long term ("permanent") and specifically for households with at least one member who is experiencing chronic homelessness – living with a disabling condition and experiencing lengthy or episodic homelessness

- The District can submit one (1) application in response to this opportunity; HUD expects to make 25 awards nationally.

Creating New Inventory

- HUD "bonus funding" opportunities are specifically designed to create brand new housing inventory for households experiencing homelessness

- CoC Builds has an additional focus on using funds to newly construct or rehab units (including adaptive reuse) to be used as the physical housing space for a specific new program – not for general inventory that may be used as PSH set asides

- Good opportunity for providers with development experience or for providers and developers to partner for a joint application

- <u>Can not</u> use funding to expand a program that is already operating
  - Proposed projects may seek to duplicate an existing program, but must add to inventory of housing resources in the District.

- <u>Can</u> use funding to support a project for which development is underway but that is not operating, serving households, etc.

Funding Uses

- CoC Builds budget requests must predominantly be for construction/rehabilitation costs (70-100% of request).
  - Even if the full requests goes to capital costs, the application must describe the program that will ultimately be created/housed at the constructed/rehabbed site.

- The budget may also include:
  - <u>Rental Assistance</u>: pays participants' rents while in RRH or PSH
  - <u>Supportive Services</u>: services paid for by the grant that help program participants obtain and maintain their housing
  - <u>Operating</u>: support for ancillary costs associated with operating the program
  - <u>HMIS</u>: provides funding to assist providers with meeting HUD's reporting requirements
  - <u>Administration</u>: Support with management, oversight, and coordination of the program

- Administration can make up no more than 10% of the total request.

- Non-capital costs can make up no more than 20% of the total request.

Grant Terms, Grant Administration, and Renewability

- The initial grant term can be 1-5 years;
  - Once the initial grant term expires the non-capital costs for the project are eligible for annual renewal (1 year terms)
  - Total dollar amount awarded is divided by the initial grant term to determine the amount that will ultimately be eligible for annual renewal.

- The opportunity for renewal will be announced by HUD, through the CoC Program NOFO (CoC Builds awardees likely to be added to the portfolio of program that renew through this process annually

- Grant administration through initial and subsequent grant terms will be conducted by TCP
  - TCP must submit the application and identify its subrecipients
  - HUD will issue a grant agreement with TCP; TCP will issue a subcontract with provider
  - Administrative portion of the award is shared (TCP portion is typically 3% of the total award or 3/10 of Admin portion)

Application Submission

Application Submission

- The CoC Builds application is a 25 page narrative with topic parameters set by HUD;

- ICH Ranking Committee will review the applications received and will select the one submitted to HUD.

- Materials will be due to the Ranking Committee by October 10

  - Ranking Committee will spend 2-3 weeks reviewing applications and making their selection;

  - TCP will notify the selected applicant and will work together with the applicant to finalize the package that will be submitted to HUD by November 21.

- HUD will use a 100 pt scale to rate applications

Narrative: Development Experience

- 5 pages

- 24 points

- Demonstrate that the applicant, developer, and relevant subrecipients have:
  - experience with **at least four other projects that have a similar scope and** scale as the proposed project (up to 8 points)
  - experience leveraging resources similar to the funds being proposed in the current project (up to 8 points)

- Provide information regarding the availability of other resources dedicated to the proposed project (up to 8 points):
  - If the project includes more than one housing type or location provide cost per unit information on each site or housing type to the extent possible.

Narrative: Homeless Services Experience

- 4 pages
- 12 points

- Demonstrate that the provider organization that will work with program participants has experience operating programs for individuals and/or families who were once experiencing homelessness

- As this project is PSH, description must include services provided to households where at least one member was living with a disabling condition

Narrative: Implementation Timeline

- 2 pages
- 12 points

- Provide the proposed schedule for the other key activities.
  - HUD will evaluate the implementation schedule and provide up to 4 points based on whether the development schedule has all necessary elements, up to 4 points depending on likelihood that development milestones will be met, and up to 4 points based on the likelihood that the project will be ready for occupancy within 36 months of award.

- New Construction – date construction will begin and end, and date property will be available for move-in.

- Acquisition – date property will be acquired.

- Rehabilitation – dates rehabilitation of the property will begin and end.

Narrative: Maintenance

- 2 pages
- 5 points

- Provide information on how the property will be maintained over time, and how unnecessary or costly repairs will be prevented

Narrative: Coordinated Entry Participation

- 2 pages

- 3 points

- Describe how the project will work with the CAHP system to identify program participants in need of PSH (if proposing a project that will be a victim service provider site, identify the process that will be used instead).

- Must include information on the local Coordinated Entry process which can be provided by TCP.

Narrative: Promoting Racial Equity

- 4 pages

- 8 points

- Describe experience soliciting, obtaining, and using feedback from underserved groups when designing, planning, and implementing projects.

- Experience designing or operating programs that have improved racial equity, particularly among people experiencing homelessness.

- Experience building partnerships with grassroots and resident-led organizations that provide housing, health care, and supportive services.

Narrative: Integration for Persons with Disabilities

- 2 pages
- 7 points

- Demonstrate how PSH will enable program participants to make meaningful choices about housing, health care, and long-term services and supports that will allow them to fully participate in the community.
  - The response should include how the PSH units will ensure non-segregation of individuals and families experiencing homelessness where at least one household member has a disability.

- Additionally, the response should include state whether the PSH units will be part of mixed-use development, meaning individuals and families that will reside in the units are not all disabled.

Narrative: Section 3 Requirement

- 1 pages

- 2 points

Describe the actions that will be taken by project applicants to comply with Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (Section 3) and HUD's implementing rules at 24 CFR part 75 to provide employment and training opportunities for low- and very low-income persons, as well as contracting and other economic opportunities for business that provide economic opportunities to low- and very low-income persons.

This does not affect applicant's existing responsibilities to provide training, employment, and other economic opportunities pursuant to Section 3 that result from their receipt of other HUD funding. Grants to Indian Tribes are subject to Indian Preference under Section 7(b) of the Indian Self-Determination and Education Assistance Act (25

U.S.C. 5307(b) and are not subject to Section 3 requirements.

Other Application Pieces

- Other narratives on Environmental Justice, Affirmative Marketing/Outreach, Furthering Fair Housing

- Budget: TCP will provide HUD budget form that is required to submit along with narratives

- Forms: Other forms are required; TCP will provide those to the project that is selected by the Ranking Committee in preparation for submission to HUD.

- Formatting: HUD requires that narratives be no longer than 25 pages, and that text is double spaced using 12pt Times New Roman font, with 1 inch margins on letter sized paper. Be sure to title each part of the narrative with the piece of the narrative being responded to in a given section.

HUD Threshold Requirements

HUD Threshold Requirements

HUD Threshold Requirements: HUD reviews 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's Ranking Committee must conduct a similar review of project applications prior to submission to HUD.

The Ranking Committee is unlikely to approve any projects for the Consolidated Application if they do not commit to maintaining these requirements.

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

HUD Requirements: Match

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 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.

HUD Requirements: Site Control

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.

HUD Requirements:
Data Collection & Reporting

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.

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.

HUD Requirements: CAHP Participation

CAHP/Coordinated Entry Participation: HUD requires that referrals for programs receiving CoC funding come through the community's coordinated entry process, referred to locally as Coordinated Assessment and Housing Placement (CAHP).

- Program participants are matched to and prioritized for housing resources based on a uniform assessment which pairs information about a person or family's service needs with available programs.

- TCP's CAHP team will make referrals into the program as vacancies arise.

HUD Requirements: Environmental Review

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.

HUD Requirements: Equal Access

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.

Questions?

Policy Priorities

1. **Ending homelessness for all persons**

   a. To end homelessness, CoCs should identify, engage, and effectively serve all persons experiencing homelessness.

   b. CoCs should measure their performance based on local data that consider the challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, or those experiencing chronic homelessness, and people with disabilities, including those living with HIV/AIDS).

   c. CoCs should partner with housing, health care, and supportive services providers to expand housing options, such as permanent supportive housing, housing subsidies, and rapid rehousing.

   d. Additionally, CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.

2. **Use a housing first approach**

   a. Housing First prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions. CoC Program funded projects should help individuals and families move quickly into permanent housing, and CoCs should measure and help projects reduce the length of time people experience homelessness.

   b. Additionally, CoCs should engage landlords and property owners to housing units available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt client-centered service methods.

   c. HUD encourages CoCs to assess how well Housing First approaches are being implemented in their communities.

Policy Priorities

3.   Reducing unsheltered homelessness

    a.   In recent years, the number of people experiencing unsheltered homelessness has risen significantly, including a rising number of encampments in many communities across the country. People living unsheltered have extremely high rates of physical and mental illness and substance use disorders.

    b.   CoCs should explore all available resources, including CoC and ESG funded assistance, housing subsidies, health care programs, and supportive services to help improve unsheltered people's well-being and help them move as quickly as possible into permanent housing.

    c.   **NEW IN 2024** CoCs should work with law enforcement and their state and local governments to enlist their support for housing people in encampments, and to avoid practices that criminalize homelessness. Criminalization of homelessness risks the health of people living unsheltered and makes it more difficult for them to move into permanent housing.

    d.   Additionally, CoCs should use their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing and services, and ensure people experiencing homelessness receive assistance quickly.

4.   Improving system performance

    a.   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.

    b.   CoCs should review all projects eligible for renewal under this FY 2024-2025 NOFO to determine their effectiveness in serving people experiencing homelessness, including cost-effectiveness. The CoC Competition includes several options to help CoCs improve their effectiveness, including reallocation, expansion, and transition grants.

    c.   CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies.

Policy Priorities

5. **Partnering with housing, health, and service agencies**

    a. Using cost performance and outcome data, CoCs should improve how all available resources are utilized to end homelessness.

    b. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and to:

    (1) **REVISED IN 2024** Work closely with health care systems and agencies and assist program participants to receive health care and supportive services, including behavioral health services, including those covered and financed by Medicaid. 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.

    (2) Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing subsidies to people experiencing homelessness. These partnerships can also help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options. CoCs and PHAs should especially work together to implement targeted programs such as Emergency Housing Vouchers, HUD-VASH, Mainstream Vouchers, Family Unification Program Vouchers, Fostering Youth Independence Vouchers, and other housing voucher programs targeted to people experiencing homelessness. CoCs should coordinate with their state and local housing agencies on the utilization of new HOME program resources provided through the Homelessness Assistance and Supportive Services Program that was created through the American Rescue Plan.

    (3) **NEW IN 2024** CoCs should also work with other organizations administering other housing assistance, such as assistance provided through HUD's Section 202 and 811 programs, HUD's Project Based Rental Assistance, and U.S. Department of Agriculture's housing assistance programs.

    (4) Partner with local workforce development centers to improve employment opportunities.

Policy Priorities

6. Racial equity

    a.   In nearly every community, Black, Indigenous, and other people of color are substantially overrepresented in the homeless population. HUD is emphasizing system and program changes to address racial equity within CoCs and projects.

    b.   Responses to preventing and ending homelessness should address racial inequities to ensure successful outcomes for all persons experiencing homelessness using proven approaches, such as: developing a coordinated community response created in partnership with a racially diverse set of stakeholders and people experiencing homelessness and partnering with organizations with experience serving underserved populations.

    c.   ****REVISED IN 2024**** CoCs should review local data, policies, procedures, and processes to determine where and how to address racial disparities affecting individuals and families experiencing homelessness and take steps to eliminate barriers to improve racial equity and address disparities.

7. Improving assistance to LGBTQ+ individuals

    a.   Discrimination on the basis of gender identity or sexual orientation manifests differently for different individuals and often overlaps with other forms of prohibited discrimination. CoCs should address the needs of LGBTQ+, transgender, gender non-conforming, and non-binary individuals and families in their planning processes.

    b.   Additionally, when considering which projects to select in their local competition to be included in their application to HUD, CoCs should ensure privacy, respect, safety, and access regardless of gender identity or sexual orientation in projects.

    c.   CoCs should also partner with organizations with expertise in serving LGBTQ+ populations.

Policy Priorities

8. **Persons with lived experience (***Revised in 2024***)**

   a. The people who know best what solutions will effectively end homelessness are those who are experiencing homelessness.

   b. HUD expects CoCs to include people who have lived homeless expertise and experience in their local planning and decision-making processes.

   c. People with lived experience/expertise should determine how local policies may need to be revised and updated to improve the effectiveness of homelessness assistance programs, including participating in planning and oversight activities and developing local competition processes, monitoring and evaluation.

   d. CoC leaders and stakeholders should prioritize hiring people who have experienced homelessness in areas where their expertise is needed (e.g., peer outreach and support).

9. **Building an Effective Workforce (***New in 2024***)**

   a. Homeless assistance providers need effective, well- supported staff to provide high quality assistance but recruiting and retaining qualified staff for programs to assist persons experiencing homelessness has proven difficult due to low pay and the challenging nature of the work.

   b. HUD is applying cost of living adjustments to supportive service activities and other staffing-focused budget lines to allow CoC budgets to better keep up with rising costs.

   c. HUD also encourages CoCs to work with their funders and other community stakeholders to improve pay and support for people who work in the homelessness sector.

Policy Priorities

10. **Increasing affordable housing supply**

   a. The lack of affordable housing is the main driver of homelessness. CoCs play a critical role in educating local leaders and stakeholders about the importance of increasing the supply of affordable housing and the specific consequences of the continued lack of affordable housing.

   b. CoCs should be communicating with jurisdiction leaders, including for the development of Consolidated Plans, about the harmful effects of the lack of affordable housing, and they should engage local leaders about steps such as zoning and land use reform that would increase the supply of affordable housing.

   c. This FY2024-2025 CoC NOFO awards points to CoCs that take steps to engage local leaders about increasing affordable and accessible housing supply.

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