



The Community Partnership  
For The Prevention  
of Homelessness

# 2024 HUD CoC Program NOFO Meeting for: Renewing Projects

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DISTRICT OF COLUMBIA CONTINUUM OF CARE

AUGUST 14-15, 2024

# *Continuum of Care*

# Defining “Continuum of Care”

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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 CoC Roles and Responsibilities

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## 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 CoC Roles and Responsibilities

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## 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.

# Applications

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## Consolidated Application

- The Consolidated Application includes:
  - Information on the local CoC's response to homelessness, the structure of its Board (ICH), local HMIS implementation, system performance, and coordination other systems who work with persons experiencing homelessness.
  - The Consolidated Application is submitted with the "Project Listing" – the ranked listing of projects approved by the Ranking Committee.

## Project Applications (Renewal Applications)

- The Project Application include information on the projects'
  - Population to be served (both in terms of program type and how many individuals or families)
  - Commitment to Housing First and other HUD policy priorities
  - Type of services that will be offered by project/billed to HUD grant
  - Description of physical housing space
  - Estimates about demographic make up of persons served
  - Budget requests (overall dollar amounts) and match sources
  - Mostly tables and checkboxes. Very little narrative (program description) except for YHDP renewals (a few more narratives responses than CoC renewals).

# *Timeline*



# Timeline, HUD CoC Program NOFO

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- June 25, 2024: Preliminary information session held with providers
- July 9, 2024: ICH Executive Committee meeting gathering info from ICH stakeholders.
- July 31, 2024: NOFO released.
- Aug 1-2, 2024: Ranking Committee Orientation Meetings held.
- August 8, 2024: Ranking Committee Meeting to finalize review criteria.
- August 13, 2024: ICH Executive Committee Meeting to approve Ranking Committee criteria.
- August 14-21, 2024: Provider meetings, office hours for renewals, and training for new project applicants.
- September 10, 2024: Information on changes to applications due to TCP.
- September 18, 2024: All provider applications and materials for ranking due to TCP/Ranking Committee.
- Sept. 30, 2024: Project Applications list due (ICH deadline, list of all project applications considered).
- Oct. 15, 2024: Final Ranking due. Project Applicants informed of Ranking Committee's decisions.
- Oct. 30, 2024: Consolidated Application due to HUD.

# *What's New in 2024?*

# Two year NOFO cycle

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- The HUD NOFO release indicates that this year’s NOFO is a “two year” NOFO.
- The process in 2024 will be similar to previous years, and projects awarded this year \*may\* not need to apply to renew in 2025 (\*potential\* automatic renewal).
- Projects NOT eligible for renewal in *2024*, but that will be eligible in *2025*, will need to submit project applications for FY25 funding by August 29, 2025.
  - Details on how this will work are forthcoming from HUD.
- While projects renewing “as is” in 2024 may not need to submit renewal applications next year, renewals that are approved by the Ranking Committee to go through the reallocation, expansion, or consolidation process will need to submit renewal applications for their “new” project in 2025.

# Budget Changes within the Application

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- In 2024, renewal applications can include shifts of up to 10% from one Budget Line Item (BLI) (Leasing, Rental Assistance,\* Supportive Services, Operating, HMIS, or Admin) to another.
  - If funds are moved into the Admin line, per HUD, the Admin portion of the grant can be no greater than 10% of the total award.
- This can not increase the overall grant amount applied beyond what HUD has already awarded. If one or more BLI is increased, reductions to other BLIs will need to be made accordingly.
- This will not be considered a substantial change by HUD – still an “as is” renewal and does not warrant a going through the reallocation process in 2024.

\*Rental Assistance budget will still be subject to formula, determined by number and size of units and FMR.

# More Bonus Funding

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- The funding available to DC in 2024 is:
  - Approx. \$3.4M for the CoC Bonus
  - Approx. \$2M for the DV Bonus
  - As of this morning, final figures for both are still TBD.
- Like last year, HUD is allowing renewing programs to apply to use Bonus funding to apply to expand existing HUD CoC/YHDP programs (requests approved by the Ranking Committee, then by HUD).
- *Requests to reallocate or consolidate grants are treated as new projects but cannot request Bonus funding.*
- Will come back to using these opportunities for brand new programming shortly!

# Streamlined Application for Renewals

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- TCP will not require renewing project applicants to fill out the Excel template that we have used previously.
  - Instead, TCP will circulate your 2023 Project Application that was submitted to HUD and you can let us know via email what, if any, changes should be made for 2024 (including any 10% budget shifts).
- The Ranking Committee is still asking for supplemental information (previously, the “justification letters”) on the projects to inform their ranking.
- These materials will be submitted to the Ranking Committee via smartsheets and are due **Sept. 18, 2024**.

# *Options for Existing Projects*

# Renewals

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- **A project is eligible to renew under the 2024 NOFO if it funded by a HUD CoC grant that that ends in Calendar Year 2025. These include:**
  - Projects that were awarded renewal funding through the FY2023 NOFO (even if a contract has not yet been issued)
  - Projects that were reallocated, expanded, or consolidated during the FY23 NOFO (new projects with 1 year grant terms)
  - Projects that were awarded via previous years' Bonus Opportunities with grant terms (1 or more years) that expire in CY25.
- **A renewing grant can have been awarded under the HUD CoC program or the YHDP opportunity.**



# Reallocation

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- A project that is eligible for renewal in FY2024 may request to reallocate their funding to create a new project. Reallocation shifts funds in whole or part from existing eligible renewal projects to create one or more "new" projects.
- These are treated by HUD and the Ranking Committee as new projects/funding requests and require applicant to submit both new AND renewal applications. TCP suggests attending a New Project Application training session to fully understand that process.
- Only programs with permanent housing components can be created through reallocation:
  - Joint Transitional-Rapid Rehousing
  - Rapid Rehousing
  - Permanent Supportive Housing
- Renewal projects rejected by the Ranking Committee may also be reallocated to create brand new inventory for the CoC.

# Expansion

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- **Projects that are eligible for renewal in FY2024 may request to expand their project using Bonus dollars for which the CoC is eligible to apply.**
  - Includes: adding units/beds, increase persons served, expand services for existing participants (with or without expanding capacity).
  - Both the CoC Bonus and DV Bonus funding is available to use to expand projects but a past DV Bonus recipient may only expand with DV Bonus dollars and other CoC Program recipients may only expand using CoC Bonus dollars.
- **These are treated by HUD and the Ranking Committee as new projects/funding requests and require applicant to submit both new AND renewal applications. TCP suggests attending a New Project Application training session to fully understand that process.**

# Consolidation

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- **Projects that are eligible for renewal in FY2024 may request to consolidate two or more programs/grants to create one single program**
- **Both projects must submit renewal applications and flag in the application that which grant will move forward and assume the funding from the other.**
- **The expectation is that this allows for the expansion of the size or scope of the program without using CoC or DV Bonus dollars to fund the expansion.**
- **Subject to approval by the Ranking Committee and ultimately by HUD.**

# *Ranking & Submission Process*

# Ranking

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- HUD requires that new and renewing project applications are submitted in a ranked (priority) order.
- The ranking order signals to HUD what the community priorities within the community's overall funding request. This tells HUD which programs they should fund first if HUD is not able to fund our entire request (or all requests nationally).
- The Ranking must be determined by 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 that conducts the project ranking of all projects seeking new or renewal funding. **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 Committee approves or rejects all applications/requests for funding. They may also provisionally accept an application but ask TCP to work with the provider on changes to project scope and/or budget before formally approving the request.

HUD Criteria Categories	2024 Local Ranking Criteria
Objective Criteria (33%)	Program Unit/Slot Utilization Rate
	Rate that Grant Is Matched/Leveraged
	Costs per household*
Performance Criteria (20%)	Client Satisfaction Survey Results*
	Housing Stability and/or exits to Permanent Destinations
	Increase (TH/RRH) or Maintain (PSH) Income Obtained or Maintained Health Insurance*
	Data Quality
	Length of Stay
Threshold Criteria (47%)	Provides services to a key subpopulation
	Addresses vulnerabilities of persons served
	Incorporates program participant feedback into program design and operations*
	Uses participant grievances and/or monitoring findings to improve program*
	Approach to implementing federal policy priorities (See next slide!) *new in 2024

# 2024 Ranking Criteria: Policy Priorities

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**Policy Priorities:** HUD establishes policy priorities ([detailed definitions at end of presentation](#)).for each funding competition, and CoCs are tasked with establishing their own as well. HUD expects that CoCs will only include projects in their Consolidated application projects that can demonstrate alignment with both local and HUD priorities. [In 2024, these are:](#)

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. Addressing Race Equity
7. Improving Assistance to LGBTQ Individuals
8. Increasing Affordable Housing Supply
9. Including People with Lived Experienced in the Planning Processes ([new in 2024](#))
10. Building an Effective Workforce ([new in 2024](#))

# Renewal application submission

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- **Email TCP by Sept. 10 with any requests to change 2023 Application for 2024.**
  - TCP will circulate 2023 applications this week with info on how much funding each project is eligible to apply for in 2024.
  - Review applications thoroughly to determine:
    - Whether your agency would like to make any 10% budget shifts.
    - If there are any parts of the application that you would like to update (aside from changing the population served and/or size of the program).
  - TCP will incorporate permissible requests in to HUD's grant submission portal and share the applications with the Ranking Committee by the Sept. 18 deadline.
    - If your application changes include requests to reallocate your existing grant or a request to expand or consolidate it, you must submit a new project application. These are also due Sept. 18.



# Renewal application submission

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- **Complete the supplemental information form for the Ranking Committee.**
  - TCP will circulate the form along with your 2023 applications. Also due Sept. 18.
    - This is your opportunity to let the Ranking Committee know the general information about your project and what makes it unique.
    - You may also use the narratives to provide information on successes in the last year as well as to provide context for challenges.
    - The Ranking Committee has revamped the old “justification letter” so that they (e.g. not just yes/no on whether the project is Housing First; how the principle is part of program operations, etc.)
    - Be sure to address new areas as well (flagged on “2024 Ranking Criteria” slide).

# HMIS/Osnum data

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- **Ensure HMIS/Osnum is up to date and accurate for the period of July 2023-June 2024.**
  - TCP will pull the HMIS data needed to inform ranking on August 30.
  - Providers using Osnum should submit APR info for the above period to TCP by August 30 as well.
  - HMIS data reviewed by Ranking Committee are all metrics that have been included in the APRs and quarterly PQI reports (most recent report distributed Aug 9.)
    - If you have questions about the reports circulated that cover the above report period, please contact TCP as soon as possible.
  - While the ranking is informed by the metrics APRs and in the PQI reports, the reports themselves are not used by the Committee – there is still time to make updates to HMIS if the reports highlighted documentation issues that needed to be corrected.

# *New Funding Opportunities*



	CoC Bonus	Domestic Violence (DV) Bonus	CoC Builds
Part of 2024 CoC NOFO	Yes	Yes	
Standalone NOFO			Yes
Funding Available (approx.)	\$3.4 million	\$2 million	\$7.5 million
Eligible Program Types	Permanent Supportive Housing Rapid Rehousing Joint Transitional/Rapid Rehousing	Rapid Rehousing Joint Transitional/Rapid Rehousing	Permanent Supportive Housing
Target Population	Households experiencing homelessness at entry (chronic homelessness if PSH)	Households experiencing homelessness at entry who are survivors of DV, dating violence, sexual assault, or stalking	Households experiencing chronic homelessness at entry
Must Create Brand New Program/Inventory	Yes, unless expanding existing HUD CoC Program	Yes, unless expanding existing HUD CoC Program previously funded by DV Bonus	Yes
Funding uses	Non capital costs (leasing/rental assistance, supportive services, operations, admin)	Non capital costs (leasing/rental assistance, supportive services, operations, admin)	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	1-5 years	1-5 years
Renewable	Yes	Yes	Partially (Non capital costs only)
Application	Narrative/tables; submitted through HUD's electronic system	Narrative/tables; submitted through HUD's electronic system	Narrative only (25 pgs); submitted through grants.gov
Subject to HUD Threshold Criteria	Yes	Yes	Yes
Must Align with HUD/Local Policy Priorities	Yes	Yes	Yes
Ranking Committee approval before submission	Yes	Yes	Yes
Number of submissions allowed in response	Multiple (total request limited to figure above)	Multiple (total request limited to figure above)	1
Application materials due to ICH	September 18th	September 18th	October 10th
Applications due to HUD	October 30th	October 30th	November 21st

# Funding Available & Eligible Program Types

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## HUD Continuum of Care (CoC) NOFO:

### **CoC Bonus (approx. \$3.4M):**

- Rapid Rehousing (RRH);
- Joint Transitional-RRH;
- Permanent Supportive Housing (PSH);

### **DV Bonus: (approx. \$2M):**

- Rapid Rehousing (RRH);
- Joint Transitional-RRH;

## CoC Builds NOFO:

### **CoC Builds program (approx. \$7.5M):**

- Permanent Supportive Housing (PSH)

# Target Populations

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- The HUD funding associated with both NOFOs must be used to create programming for households (single person and family) who are experiencing homelessness at program entry.
  - For PSH, at least one household member must be experiencing chronic homelessness – lengthy or repeated episodes of homelessness – to be considered eligible for the housing.
- The CoC Bonus and CoC Builds opportunities do not have a specific population focus, but the Ranking Committee is considering where gaps in the system exist in selecting projects.
- The DV Bonus is specifically for households experiencing homelessness who are fleeing or have histories as survivors of domestic/intimate partner violence, dating violence, sexual assault or stalking.

# Creating New Inventory

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- These opportunities are specifically designed to create brand new housing inventory in the District of Columbia 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
- **Can not** use funding to fund or expand a program that is already operating without HUD CoC dollars
  - Existing HUD CoC Program projects can apply to use CoC or DV Bonus dollars to expand their programs
  - Proposed projects may seek to duplicate existing successful program models at existing non-HUD funded sites, but must add to inventory of housing resources in the District.

# Funding Uses

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- CoC Builds budget requests must predominantly be for construction/rehabilitation costs (70-100% of request).
- The budget for all three opportunities may also include a combination of the following components:
  - **Leasing**: pays for units or a structure used for TH portion of Joint TH/RRH program
  - **Rental Assistance**: pays participants' rents while in RRH or PSH
  - **Supportive Services**: services paid for by the grant that help program participants obtain and maintain their housing
  - **Operating**: support for ancillary costs associated with operating the program
  - **HMIS**: provides funding to assist providers with meeting HUD's reporting requirements
  - **Administration**: Support with management, oversight, and coordination of the program
- For the CoC Bonus, DV Bonus, and CoC Builds, Administration can make up no more than 10% of the total request.
- For CoC Builds, the other non-capital components above can make up no more than 20% of the total request.



# Grant Terms, Grant Administration, and Renewability

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- **The initial grant term applied for can be 1-5 years;**
  - Once the initial grant term expires the project is 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.
  - For CoC Builds, on the non capital portion of the budget is renewable
- 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**
  - 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)

# New Project Application Submission

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- TCP will hold trainings on the application materials/process for both NOFO's opportunities.
- For the CoC and DV Bonus:
  - Tues, August 20<sup>th</sup> at 3:00 pm
  - Weds, August 21<sup>st</sup> at 10:00 am
  - (Other sessions possible/as needed)
- For CoC Builds:
  - Weds, August 28<sup>th</sup> at 10:00 am
  - Thurs, August 29<sup>th</sup> at 2:00
- Registration links will be distributed; Teams information will be shared with registrants.
- More sessions possible as needed

# New Project Application Submission

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- The actual application materials for the CoC/DV Bonuses and CoC Builds are very different
- For the CoC/DV Bonuses there is a paper form application to complete that includes narratives and tables/charts to complete; applications received will be scored and ranked along side other projects pursuing (renewal) funding under the CoC Program NOFO.
- The CoC Builds application is a 25 page narrative with topic parameters set by HUD; applications received will be compared to each other to select the one submitted to HUD.

# New Project Application Submission

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- The ICH Ranking Committee can approve multiple applications to submit to HUD under the CoC Bonus and DV Bonus, so long as the total of the submission requests do not exceed the amount the CoC is eligible to receive (\$3.4 M for CoC Bonus; \$2 M for DV Bonus).
- However, only one (1) application submission in response to the CoC Builds opportunity is allowed.
- Both opportunities require that an application be submitted to the local Ranking Committee for consideration prior to submission to HUD. These will be due:
  - September 18<sup>th</sup> (CoC and DV Bonus)
  - October 10<sup>th</sup> (CoC Builds)
- Final applications must be submitted to HUD about six weeks later; intervening time is for the Ranking Committee to review materials, make selection(s) and for selected applicant(s) to work with TCP on final submission.
- Final due dates are:
  - October 30<sup>th</sup> (CoC and DV Bonus)
  - November 21<sup>st</sup> (CoC Builds)

# Questions?

# TCP Contacts

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# *2024 Policy Priorities*

# Policy Priorities

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## 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

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## 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

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## 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

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## 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

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## 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

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## 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.

# *HUD Threshold Requirements*

# HUD Threshold Requirements

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**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: Equal Access

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**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.



# HUD Requirements: Match

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**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.

# HUD Requirements: Site Control

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**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: Environmental Review

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**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: Data Collection & Reporting

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**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

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**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.