

CONTINUUM OF CARE FOR HOMELESS PROGRAMS

2023 DeKalb CoC Program Competition

Pre-Application Guidelines for Renewal CoC Projects

Program Description: The Continuum of Care (CoC) Program (24 CFR Part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, States and local governments to quickly re-house homeless individuals, family, youth and persons fleeing domestic violence, dating violence, sexual assault, and stalking, while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless individuals and families; and to optimize self-sufficiency among those experiencing homelessness.

Authority: The CoC Program is authorized by subtitle C of the title IV of the McKinney-Vento Homeless Assistance Act, (42 U.S.C. 11381-11389) (the Act), and the CoC Program rule found in 24 CFR part 578 (the Rule). The FY 2022 funds were authorized by the Consolidated Appropriations Act, 2022 (Public Law 117-103), approved March 15, 2022).

Funding Opportunity Overview: Each year the U.S. Department of Housing and Urban Development (HUD) issues a Notice of Funding Opportunity (NOFO), to invite applications from eligible applicants for the program and purpose described within this NOFO. Prospective applicants should carefully read all instructions in all sections to avoid submitting an incomplete or ineligible application. HUD funding is highly competitive.

Available Funds: TBD

Local Competition: A Consolidated Application will be submitted to HUD for CoC Program funding by the DeKalb County CoC Collaborative Applicant. Before the Consolidated Application is submitted, a local competition is required to determine which projects will be included in the consolidated application, along with their relative priority. Project applications submitted to the CoC for inclusion on the FY2022 CoC Priority Listing as part of the CoC Consolidated Application must be reviewed and either accepted and ranked, approved, or rejected by the CoC. All applicants interested in applying for CoC Funding must participate in the local competition described herein.

DEKALB COC NOFO TIMELINE

DeKalb CoC Pre-Application Posting Date:

May 19, 2023

Renewal Project Pre-Application Due Dates:

Renewal Project Applications -

June 19, 2023 - 5:00 p.m.

Application Submission Requirements:

Applications will be submitted online. One (1) original copy of the application must be received in full no later than 5:00 p.m. eastern time, on the due date referenced above. Applications must be emailed with all labeled attachments to mcolbert@dekalbcountyga.gov. If you have questions please call the Community Development Department at (404) 371-2727.

Eligible Applicants:

- Local Governments
- Public Housing Authorities
- Non-Profit organizations having 501c3 status with the IRS for a minimum of two (2) years.
- For-profit entities are not eligible to apply for grants or to be subrecipients of grant funds.

See General Information for additional threshold and eligibility requirements.

General Information

Section A General Information

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(For Reference Only – FY23 CoC /HUD Policy Priorities TBD)

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Local Competition Timeline and Important HUD Required Dates

2023 HUD CoC NOFO Release Date

TBD

DeKalb CoC Pre-Application Release Date for Renewal Projects

May 19, 2023

Renewal Applicant Information Meetings (Virtual)

May 19, 2023

1:00 -3:00 p.m.

ZOOM Log In: https://dekalbcountyga.zoom.us/j/83726334786

Technical Assistance Period –Renewal Projects

May 22-24, 2023

Local Pre-Applications Due Date

Renewal Project Pre-Applications

June 19, 2023 - 5:00 p.m.

All Project applications are required by HUD to be submitted to the CoC no later than 30 days before the application deadline of TBD by HUD

Project Applications Entered Into E-Snaps

TBD

Application Review and Ranking

TBD

Notification of Selection

TBD

All project

applicants who submitted a new or renewal project application by August 29, 2022 will be notified at least 15 days prior to the HUD submission date whether their project application (s) will be accepted and ranked on the CoC Priority Listing, rejected, or reduced.

Public Posting

TBD

All parts of the CoC Consolidated Application, including the Application attachments, and the Priority Listing will be posted on the DeKalb County website with community and stakeholder notice of posting.

Deadline to Submit Consolidated CoC Application to HUD

TBD

SECTION A					
GENERAL INFORMATION					
Purpose	This Notice of Fund Availability (NOFA) has been issued by the DeKalb County Department of Community Development, as Collaborative Applicant for the DeKalb Homeless Continuum of Care (CoC), to seek new and renewal applications from non-profit organizations and public entities to provide coordinated community- based services to homeless individuals, families, unaccompanied youth and persons fleeing domestic violence, dating violence, sexual assault and stalking in DeKalb County, Georgia. Program services are designed to quickly re-house the homeless while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by the homeless; and to optimize self-sufficiency among those experiencing homelessness.				
Availability of Funds TBD	 In FY2022, the DeKalb CoC is eligible to apply for the following amounts: CoC Estimated Annual Renewal Demand (ARD): TBD Estimated Tier 1 Funding - (95% of CoCs ARD) Estimated Tier 2 Funding - (CoC Bonus amount, i.e. 5% of Preliminary Pro Rata Need) DV Bonus - (single or multiple awards) – minimum award \$TBD) Estimated Planning Grant Amount: \$189,935 (not ranked) 				
Use of Funds	 24 CFR 578.37 through 578.63 identifies the eligible projects for which funding can be requested through the FY2023 Continuum of Care (CoC) Program Competition. CoC funds may be used to pay for the eligible costs listed in 24 CFR 578.37 through 578.63 when used to establish and operate the following projects: 1. Permanent Housing (PH); The CoC Program funds two types of permanent housing: a. Permanent Supportive Housing for Persons with Disabilities (PSH) These projects are for chronically homeless at program entry or who meet the definition of DedicatedPLUS as described in Section III.B.2g of the HUD CoC NOFO. PH-PSH Requirements can be found in 24 CFR 578.37(a)(1)(i). b. Rapid Re-housing (RRH). Projects for people who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3. Dekalb County CoC is not approved to serve people who qualify as homeless under paragraph (3). 2. Joint Transitional Housing and Rapid Re-Housing a. Projects for people who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3. Dekalb County CoC is not 				

approved to serve people who quality as homeless under paragraph (3).

- **3. Supportive Services Only (SSO)** projects to develop or operate a centralized or coordinated assessment system.
- 4. Dedicated HMIS projects for the costs at 24 CFR 578.37 (a)(2) that can only be carried out by the HMIS Lead, which is the recipient or subrecipient of an HMIS grant and is listed as the HMIS Lead for the CoC.

See Glossary for a full description of eligible populations, project components and allowable costs

Requests for ineligible projects, costs or populations will be rejected.

Who may apply

Renewal Project Applicants are assumed to meet the following threshold requirements to be eligible for consideration in the local Continuum of Care NOFO Application process.

• Eligible applicants include Local Governments, Public Housing Authorities or Non-Profit organizations having 501c3 status with the IRS for a minimum of two (2) years.

For-profit entities <u>are not eligible</u> to apply for grants or to be subrecipients of grant funds.

- Agency is a current recipient in good standing with local, state, or federal funding awarded under a competitive, substantive grant process that requires detailed financial and beneficiary reporting.
- Participation in a Continuum of Care (DeKalb or other Jurisdiction) Homeless Collaborative.
- Agency has an active, all volunteer board, where no voting member of the board receives any financial or in-kind remuneration from the organization and meets a minimum of four (4) times per year.
- Agency has provided homeless assistance services or housing for at least two (2) years.
- Agency must have had an outside audit by a CPA within the last twelve (12) months.
- Agency must have a minimum annual operating budget of \$100,000.
- Agency must have or obtain local approval and consolidated plan certification from the DeKalb County Community Development Department (Certificate of Consistency)
- Agency must satisfy all match requirements.

	Renewal Project Eligibility: To be eligible for renewal in FY 2023, a project must have an executed grant agreement by December 31, 2023 and have an expiration date in Calendar Year (CY) 2024 (between January 1, 2024 and December 31, 2024).
Grant Awards and Terms	Renewal Project Applicants submitting more than one proposal must demonstrate that the agency has the capacity and resources to meet all programmatic requirements including the match requirement.
	Current award utilization and contract performance may impact award limits for renewal applicants.
Match	Required Match (Cash or In-Kind Resources) Except for leasing, match resources must equal to at least 25% of the total requested HUD funding, including project and administrative costs.
	Note: Cash and In-Kind Match must qualify as eligible program expenses under the CoC interim rule at 24 CFR 578.72 – CFR 578.73.
Submission Requirements and Deadline	Renewal Project Pre-Applications – June 19, 2023 by 5:00 p.m. Applicants are required to submit one signed original, scanned and electronically transmitted by email with all required attachments (labeled) to mcolbert@dekalbcountyga.gov Faxed or partial proposals will not be accepted. All required components must be received by the due date and time and formatted as specified.
Objective Criteria for Application Review and Rating	All applications will receive a threshold review and may be denied for any of the following reasons: Agency does not meet HUD's eligibility criteria Agency lacks adequate capacity to carry out grant Proposes ineligible costs or activities Proposes to serve ineligible populations Does not show required match Current contract compliance or performance concerns Project does not demonstrate financial or management capacity to carry out project activities All applications must pass a qualifying threshold compliance review to advance in the local competition.
	II. Compliance Review:

Applications from eligible project applicants will be reviewed and evaluated based on submission criteria as set forth in the Application and Application Guidelines. Components of the application compliance review include:

- All applications must be received by the published deadline.
- All documents and attachments are accurately identified/labled in the format specified.
- All documents include required elements and satisfy proposal criteria.
- Includes required signatures (scanned original signatures)
- Format Forms completed as directed
- Required application components for the Renewal Pre-Application:
 - o Agency Information
 - o Grant Agreement Information
 - o Project Information
 - o Project Narrative
 - o Performance and Service Capacity
 - o Certifications and Assurances

• Required Documentation

- o Audit or Financial Statements
- o ELOCCS
- o APRs
- HUD Grant Agreement, Amendments and Technical Submission

Qualitative and Quantitative Review

- Each project application is read and evaluated by an independent review team. This review includes a comprehensive evaluation of the application responsiveness and alignment with the HUD policy priorities identified in the NOFO, local priorities as well as an evaluation of each application component including, but not limited to:
 - o Project Abstract
 - o Target Population and Prioritization
 - o Organizational Capacity
 - o Project Design
 - o Project Performance/ System Performance
 - o Current Contract Compliance review to include:
 - Monitoring/audit findings
 - eLOCCS draws
 - APR submissions
 - HMIS Data Quality
 - o Coordinated Entry Compliance

Project Applications that meet all proposal compliance review criteria in addition to meeting qualitative review standards will be eligible for ranking and tier placement.

Important Note for Renewal Projects: Project Quality Threshold 2022

Any project requesting renewal funding will be considered as having met the project quality threshold requires through its previously approved grant application **unless** information to the contrary is received, e.g.

- Monitoring Findings
- Results from investigations by HUDs Office of Inspector General
- Recipient routinely does not draw down funds from eLOCCS at least once per quarter,
- Consistently late APR submissions
- Compliance issues which result in the project not operating in accordance with the Rule

Project Review and Tier Ranking

HUD requires CoCs to review, rate and rank all projects submitted by project applicants, except CoC planning projects, having them fall into two Tiers based on financial threshold. All projects must pass HUD's eligibility and threshold requirement specified above, no matter their priority.

Tier 1

Tier 1 is equal to 95% of the CoCs FY 2022 Annual Renewal Demand.

Tier 1 projects will be conditionally selected from the highest-scoring CoC to the lowest-scoring CoC, provided the project applications pass both eligibility and threshold review.

DV Bonus projects may be ranked in Tier 1.

 If a DV Bonus project ranked in Tier 1 is selected for DV Bonus funds, the project will be removed from Tier 1 and the project(s) below it will move up one rank position. If it is not selected for DV Bonus funded the project will retain its ranking in Tier 1.

In the event there is insufficient funding under the NOFO to award all Tier 1 projects. Tier 1 will be reduced proportionately, which could result in some Tier 1 project falling into Tier 2.

The CoC will carefully determine the priority and ranking for all project applications in Tier 1 as well as Tier 2.

Tier 2 (CoC Bonus)

Projects in Tier 2 are less likely to be funded, and every Tier 2 project will be scored by HUD using a 100-point scale based on three factors:

- CoC Score: Up to 50 of 100 points will be awarded in direct proportion to the score received on the CoC Application.
- CoC Project Ranking: Up to 40 of 100 points for the CoCs ranking of the project application.

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	 Commitment to Housing First: Up to 10 of 100 points will be based on the project applications commitment to follow a focusing first approach that prioritized rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold). HMIS projects or SSO projects for Coordinated Assessment will automatically receive 10 points. New DV Bonus Projects will receive up to 50 points on a 100 point scale in direct proportion to the score received on the CoC Consolidated Application and responses to the DV Bonus specific questions including Collaboration with Victim Service Providers, Need for the Project, Quality of the Project Applicant Experience, Demonstration of inclusion of victim-centered practices and demonstration of plan to include survivors with lived experience in planning and project operation. 			
Technical Assistance	DeKalb CoC NOFO technical assistance will be available at the Applicant			
	Information Meeting and during the period May 22 -24, 2023.			
	After the Application Information Meeting, additional questions must be			
	submitted in writing and emailed to: adpope@dekalbcountyga.gov;			
Award Notification	Award Notifications will be made at least 15 days prior the HUD Submission			
	Date. Project Applicants will be notified by Dekalb of their application			
	rating and tier ranking. Applicant will also be notified if the project			
	application will be accepted, rejected or reallocated in the CoC			
Local Appeals	Consolidated Application submission to HUD. Project applicants that believe they were denied the opportunity to			
-coappcaio	participate in the local CoC competition in a reasonable manner and were			
	rejected or reallocated by the CoC may appeal directly to the Collaborative			
	Applicant for review by the CoC Governance Board and determination.			
	Specific guidance, forms and submission guidelines for local appeal process			
	are available upon request to the Collaborative Applicant.			
Solo Applicants	Project applicants that believe they were denied the opportunity to			
	participate in the local CoC planning process in a reasonable manner and were rejected or reallocated by the CoC may also appeal the rejection			
	directly to HUD by submitting a Solo Applicant project application in e-			
	snaps prior to the application deadline of (TBD) by 8:00 p.m. eastern time.			
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SECTION B

FOR REFERENCE ONLY – FY23 Priorities TBD

HUD'S HOMELESS POLICY AND PROGRAM PRIORITIES

CoCs will be evaluated based on the extent to which they further HUD's policy priorities.

1 ENDING HOMELESSNESS FOR ALL PERSONS

- CoCs should identify, engage, and effectively serve all persons experiencing homelessness.
- Revised in 2022 CoCs should measure their performance based on local data, taking into
 account challenges faced by all subpopulations experiencing homelessness in the geographic
 area (e.g., veterans, youth, families, those experiencing chronic homelessness, and people
 with disabilities, including those living with HIV/AIDs).
- 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.
- 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 USING A HOUSING FIRST APPROACH

Housing First prioritizes rapid replacement 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. Measure and help projects reduce the length of time people experience homelessness.
- CoCs should engage landlords and property owners to identify an inventory of housing available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt client-centered service methods.
- CoCs are encouraged to assess how well Housing First approaches are being implemented in their communities

3 REDUCING UNSHELTERED HOMELESSNESS

- 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.
- Revised in 2022 CoCs should explore all available resources, including COC and ESG funded assistance, housing subsidies, and supportive services to provide permanent housing options for people who are unsheltered.

4 IMPROVING SYSTEM PERFORMANCE

- CoC's 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 effective they are serving people experiencing homelessness.
- Coc's should use the 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.
- CoC should review all projects eligible for renewal in FY 2022 to determine their effectiveness in serving people experiencing homelessness, including cost-effectiveness.
- CoCs should look for opportunities to implement continuous quality improvement and other process improvement strategies;

 New for 2022 - HUD recognizes the effects COVID-19 had on CoC performance and data quality in FY 2021. The FY2022 CoC NOFO significantly increases the points available for system performance rating factors.

5 PARTNERING WITH HOUSING, HEALTH AND SERVICES AGENCIES

- Using cost performance and outcome data, to improve how ALL AVAILABLE resources are
 utilized to end homelessness. This is especially important as the CARES Act and American
 Rescue Plan have provided significant new resources to help prevent and end homelessness.
- Revised 2022 HUD encourages CoC's to maximize the use of mainstream and other community-based resources to serve persons experiencing homelessness
 - Work closely with public and private healthcare organizations and assist program
 participants to obtain medical insurance and receive primary medical care to
 address healthcare needs; This includes close partnerships with public health
 agencies to analyze data and design approaches that reduce homelessness, improve
 the health of persons experiencing homelessness, and prevent and address disease
 outbreaks, including HIV/AIDS.
 - 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, including partnerships to help CoC participants exist Permanent Supportive Housing through Housing Choice Vouchers
 - Use these partnerships to help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers, HUD-VASH, Mainstream Vouchers, Family Unification Program Vouchers, and other housing voucher programs targeted to people experiencing homelessness.
 - Partner with local workforce development centers to improve employment opportunities;

6 RACIAL EQUITY

- In nearly every community, Black, Indigenous, and other people of color are substantially overrepresented in the homeless population. HUD's emphasizing systems and program changes to address racial equity within CoCs.
- CoCs should review local policies, procedures, and processes to determine where and how to address racial disparities affecting individuals and families experiencing homelessness.

7 Improving Assistance to LBGT+ Individuals ** New in 2022**

- Discrimination on the basis of gender identity or sexual orientation manifests differently for different individuals and often overlap with other forms of prohibited discrimination.
- CoCs should address the needs of LBGTQ+, transgender, gender non-conforming, and non-binary individuals and families their planning processes.
- When considering which projects to include in their local competition, CoCs should ensure privacy, respect, safety, and access regardless of gender identity or sexual orientation in projects.
- CoCs should partner with organizations with expertise in serving LBGTQ+ populations.

8 PERSONS WITH LIVED EXPERIENCE ** Revised in 2022**

- HUD is encouraging CoCs to include in the local planning process people who are currently
 experiencing or have formerly experienced homelessness to address homelessness.
- People with lived experience should determine how local policies may need to be revised
 and updated to improve effectiveness and outcomes, participate in CoC meetings and
 committees as stakeholders, provide input on decisions, and provide input related to the
 local competition process (e.g. how rating factors are determined).

• CoCs should also prioritize hiring people who have lived experience where their expertise is needed (e.g. peer outreach and support).

9 Increasing Affordable Housing Supply: **New for 2022**

- The lack of affordable housing is the main driver of homelessness.
- CoCs should communicate with jurisdiction leaders, including those responsible for development of Consolidated Plans, about the effect of the lack of affordable housing and engage local leaders about steps to increase the supply of affordable housing (i.e. zoning and land use reform)
- The FY2022 CoC NOFO awards additional points to CoCs that take steps to engage local leaders about increasing affordable housing.

SECTION C: Application Guidelines

All information is required. The DeKalb County CoC reserves the right not to review incomplete applications or projects that do not meet eligibility requirements.

Required Pre-Application Components and Format

<u>Applicant Identification</u>: Identification of the applicant agency should be consistent with the name as it appears on the IRS certification of Non-Profit Status or as identified on the 2022 HUD Grant Inventory Worksheet (Renewal Applicants Only)

Required Pre-Application Components – All Project Applicants – SECTIONS A -F

Section A: Applicant Information

Section B: Project Information

Section C: Performance and Service Capacity

Section F: Certification

Required Pre-Application Components – Renewal Applicants ONLY: EXHIBITS C - H

- Audit or Financial Statement, including management letter Attach as Exhibit C
- Two most recent HUD Annual Performance Reports (APR) Attach as Exhibit D
- Line of Credit Control System (LOCCS) expenditure information Attach as Exhibit E
- HUD Monitoring Report Attach as Exhibit F
- Most recent HUD Grant Agreement, Amendments and Technical Submission –
 Attach as Exhibit H.

Transition, Expansion and Consolidated Project Applications FY 2023 - TBD

Refer to the specific NOFO section that provides the complete information you need to determine the course of action you as the project applicant want to take in this year's CoC Program Competition

TRANSITION GRANTS

- Applicants may transition renewal projects from one CoC Program component to another
 using the CoC Program Competition, over a one year grant cycle (e.g., Transitional Housing to
 Rapid Rehousing, Rapid Rehousing to Permanent Supportive Housing)
- To be eligible to receive a transition grant, the renewal project applicant must have the consent of the DeKalb CoC Collaborative Applicant.
- To create a transition grant, the CoC must wholly eliminate one or more project and use those funds to create the single, new transition grant.
- For a new project to be considered a transition grant, the applicant for the new project must be the same recipient for the eligible renewal grant(s) being eliminated, and the applicant must provide the grant number(s) of the projects being eliminated to create the new project and attach a copy of the most recently awarded project application (e.g., if the project was last

- funded in the FY 2021 CoC Program Competition, a copy of the FY 2019 CoC Program Competition project application must be attached to the project application).
- **New for 2022** The provision that no more than 50% of each transition grant may be used for costs of eligible activities of the program component originally funded no longer applies. All funds awarded must be used for eligible activities awarded under the new component for the project.
- Transition grants conditionally awarded in the FY 2023 CoC Program Competition will have one year to fully transition from the original component to the new component and this will take place during the transition grant's normal operating year.
- The project's operating start date will be the day after the end of the previous grant term for the expiring component, i.e., the transition grant will have the same operating year as the expiring component project. For transition grants reallocated from more than one project, the operating start day of the transition grant will be the day after the end of the earliest expiring grant term.
- By the end of the FY 2023 operating year, the transition grant must be operating under the new component and will be eligible to apply for renewal in the next CoC Program Competition under the component to which it transitioned.
- If HUD determines that a new project that applied to be a transition grant does not qualify to be a transition grant, but meets all other new project requirements, then HUD may award the project as a new project that is not a transition grant. In these instances, the recipient will not be permitted to expend any FY 2022 funds on activities not included in the new project application.

EXPANSION PROJECTS

- HUD will allow renewal project applicants to apply for a new expansion project under the DV Bonus, reallocation and CoC bonus processes to expand existing project by adding units, beds, persons served, services provided to existing programs, or to add additional activities to HMIS and SSO-Coordinated Entry projects within the CoCs geographic area.
- To request an expansion for a current CoC-Program funded project, applicants will be required
 to submit two project applications: (1) the renewal project application that will be expanded;
 and (2) a new project application with just the expansion information.
- For the new expansion project to be selected for a conditional award BOTH the renewal project application and the new expansion project must be selected for a conditional award.

Section D DeKalb CoC Review, Rating, Ranking and Appeals Process

OBJECTIVE RATING AND RANKING CRITERIA

NOFO Project Application Review and Rating

The Quantitative rating form for **Renewal Project Applications** is divided into five sections. Three sections mirror the application and measures project performance in key areas to include the needs, vulnerabilities and barriers of populations served, bed utilization, increased participant income, and rates of positive housing outcomes such as length of time homeless, length of participation, exits to permanent housing and housing stability.

The quantitative review also measures project level system performance in meeting the needs of people experiencing homelessness in the CoC. The Collaborative Applicant will also factor HMIS Data Quality, System Performance and compliance with the CoCs Coordinated Entry system requirements in the rating.

• A maximum of 150 points can be awarded.

I.	Application Information	25 Points
II.	Project Information	25 Points
III.	Performance and Service Capacity	25 Points
IV.	Quantitative APR and System Performance Review	50 Points
V.	Coordinated Entry Compliance Review	25 Points

 Reviewers will be provided a copy of the Pre-Application for Renewal Projects, the Application Guidelines and supporting documentation. Reviewers will also be provided a copy of the HUD eLOCCS HUD Quarterly Spending Reports, Agency Annual Performance Report (ARP) and Data Quality reports to assist in the qualitative evaluation of renewal applications.

Review Team

A diverse team of independent reviewers has been identified that reflects those over-represented in the local homelessness population, as well as those with lived experience. All reviewers have experience in the human services or homeless assistance arena and will conduct the project application reviews. An orientation is conducted and each reviewer is assigned a minimum of two project applications. Each application is reviewed by a minimum of two independent reviewers.

Rating and Ranking

Based on the results of the application rating, APR and CE compliance reviews (renewals only), project scores are rated and ranked from the highest proposal score down. Project applications are then ranked, except CoC planning projects, having them fall into two Tiers based on financial threshold. All projects must pass HUD's eligibility and threshold requirement specified above, no matter their priority.

Reallocation

The CoC will also consider reallocating funds from existing renewal projects to fund new or expand higher performing projects. The following factors will be considered: (1) Projects that do not align with

HUD and COC policies and priorities; (2) Projects that are underperforming, as measured by APR scores; (3) Projects indicating that they will not or cannot implement the scope of work submitted in the previous NOFA application and (4) Projects that show a 2-3 year trend of underspending, or projects that indicate that funding is in excess of their ability to spend.

Applicant Notification

Project applicants accepted for inclusion in the consolidated CoC NOFA application will be notified in writing 30 days prior to the HUD Consolidation Application submission deadline. Applications rejected for inclusion in the consolidated plan have the right to appeal the CoCs decision. Specific guidance is provided regarding appeal to the Collaborative Applicant of the CoC's decision. If applicant complaint cannot be resolved at the local level, Project Applicants have the right to submit a Solo Applicant directly to HUD.

Appeals

Project applicants that believe they were denied the opportunity to participate in the local CoC planning process in a reasonable manner and were rejected or reallocated by the CoC may appeal the rejection directly to the Collaborative Applicant for review by the CoC Governance Board and determination. Specific guidance, forms and submission guidelines for local appeal process are available upon request to the Collaborative Applicant. If resolution at the local level is unsuccessful, Applicants can appeal directly to HUD by submitting a Solo Applicant project application in e-snaps prior to the application deadline of (TBD) by 8:00 p.m. eastern time.

For questions or concerns, please email Ann Pope at adpope@dekalbcountyga.gov.

Glossary of Key Terms

CoC Program Components

Permanent Housing

Permanent housing (PH) is defined as community-based housing without a designated length of stay in which formerly homeless individuals and families live as independently as possible. Under PH, a program participant must be the tenant on a lease (or sublease) for an initial term of at least one year that is renewable and is terminable only for cause. Further, leases (or subleases) must be renewable for a minimum term of one month.

The CoC Program funds two types of permanent housing: permanent supportive housing (PSH) for persons with disabilities and rapid re-housing. Permanent supportive housing is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability. Rapid re-housing (RRH) emphasizes housing search and relocation services and short- and medium-term rental assistance to move homeless persons and families (with or without a disability) as rapidly as possible into permanent housing.

Transitional Housing

Transitional housing (TH) is designed to provide homeless individuals and families with the interim stability and support to successfully move to and maintain permanent housing. Transitional housing may be used to cover the costs of up to 24 months of housing with accompanying supportive services. Program participants must have a lease (or sublease) or occupancy agreement in place when residing in transitional housing. The provisions of the CoC Program's TH program component have not changed significantly from the TH provisions under SHP.

Joint Transitional Housing and PH- Rapid Rehousing

These projects provide <u>low-barrier</u>, temporary housing while individuals and families quickly move to permanent housing with a seamless program design. The joint TH and PH-RRH component combines two existing program components, TH and PH-RRH, into a single project to serve individuals and families experiencing homeless. Eligible costs include the following: Capital costs (i.e., new construction, rehabilitation, or acquisition) leasing of a structure or units, and operating costs to provide transitional housing; Short or medium-term tenant-based rental assistance on behalf of program participants to pay for the rapid re-housing portion of the project; Supportive services; HMIS; and Project administrative costs.

Joint TH and PH-RRH component projects that assist program participants must be able to provide both transitional housing assistance and rapid rehousing assistance to each program participant. HUD will require that applications for this program component demonstrate that the project will have capacity to provide both kinds of assistance as needed to each program participant.

Eligible Costs – See § 578.37(a)

The eligible costs under the CoC Program are summarized below:

Acquisition

Acquisition of real property is an eligible cost category under the PH, TH, and SSO program components. Grant funds may be used for up to 100 percent of the cost of purchasing property for the purpose of providing permanent housing, transitional housing, and supportive services only activities.

Rehabilitation

Rehabilitation of structures is an eligible cost category under the PH, TH, and SSO program components. Eligible rehabilitation costs include installing cost-saving energy measures and bringing a structure up to health and safety standards. Rehabilitation on leased properties is ineligible.

New Construction

New construction of structures is eligible under the PH and TH program components. New construction may include building entirely new facilities, constructing an addition to an existing structure that increases the floor area by 100 percent or more, and the cost of land for construction. Projects must demonstrate that construction is more cost-effective than rehabilitation. Unlike the previous regulations, the CoC Program interim rule establishes no maximum grant limits for rehabilitation or new construction. CoC Program funds may be used for up to 100 percent of costs as long as the match requirement is met through other resources. New construction on leased properties is ineligible.

Leasing Costs

Leasing is an eligible cost category under the PH, TH, SSO, and HMIS program components. Funds may be used to lease individual units or all or part of structures. Rents must be reasonable and, in the case of individual units, the rent paid may not exceed HUD-determined Fair Market Rents. Leasing funds may not be used for units or structures owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership where the partnership owns the structure without a HUD-authorized exception. When leasing funds are used to pay rent on units, the lease must be between the recipient or the subrecipient and the landowner, with a sublease or occupancy agreement with the program participant. The recipient may, but is not required to, charge the program participant an occupancy charge, consistent with the parameters specified in the interim rule

Rental Assistance Costs

Rental assistance is an eligible cost category under the PH and TH program components and may be tenant-based (TBRA), sponsor-based (SBRA), or project-based (PBRA), depending upon the component type.

Rental assistance may be short-term for up to 3 months; medium-term for 3 to 24 months; or long-term for more than 24 months. The length of assistance depends upon the component type under which the cost is funded. Recipients must serve as many program participants as identified in their funding application to HUD, but, if the amount reserved for the term of the

grant exceeds the amount needed to pay actual costs, the excess funds may be used to cover property damage, rent increases, or the rental needs of a greater number of program participants.

- TBRA. Program participants select any appropriately sized unit within the CoC's geographic area, although recipients or subrecipients may restrict the location under certain circumstances to ensure the availability of the appropriate supportive services.
 Except for victims of domestic violence, program participants may not retain their rental assistance if they relocate to a unit outside the CoC's geographic area.
- SBRA. Program participants must reside in housing owned or leased by a sponsor organization and arranged through a contract between the recipient and the sponsor organization.
- PBRA. Program participants must reside in housing provided through a contract with the owner of an existing structure whereby the owner agrees to lease subsidized units to program participants. Program participants may not retain their rental assistance if they relocate to a unit outside the project.
- When rental assistance funds are used to pay rent on units, the lease must be between
 the program participant and the landowner. Each program participant, on whose behalf
 rental assistance payments are made, must pay a contribution toward rent consistent
 with the requirements of the interim rule.

Supportive Services Costs

Supportive services are eligible costs under the PH, TH, and SSO program components. The CoC Program interim rule specifies all eligible services and clarifies that any cost not listed in the rule is ineligible. As in the past, services must be offered to residents of PSH and TH for the full period of their residence. RRH programs must require program participants to meet with a case manager at least monthly.

Services may be provided to formerly homeless individuals for up to six months after their exit from homelessness, including the six months following exit from a transitional housing project. Recipients and subrecipients are required to perform an annual assessment of the service needs of their program participants and to adjust services accordingly. Eligible costs include the cost of providing services, the salary and benefits of staff providing services, and materials and supplies used in providing services.

Operating Costs

Operating costs are eligible under the PH, TH, and HMIS program components. Funds may be used to pay the day-to-day operating costs in a single structure or individual housing units, including maintenance (such as scheduled replacement of major systems), repair, building security (when CoC Program funds pay for more than 50 percent of the facility by unit or area), electricity, gas, water, furniture, equipment, property insurance, and taxes. These costs may not be combined with rental assistance costs within the same unit or structure, and operating costs are not eligible under the SSO program component.

HMIS Costs

Costs related to contributing client data to or maintaining data in the CoC's HMIS or a comparable database for victim services providers or legal services providers are eligible costs under the PH, TH, SSO, and HMIS program components. Eligible HMIS costs include hardware,

equipment and software costs; training and overhead; and staffing costs associated with contributing data to the HMIS designated by the CoC for its geographic area.

• Project Administration

Recipients and subrecipients may use up to 10 percent of any grant, excluding the amount for CoC planning and Unified Funding Agency (UFA) costs, established through the CoC Program NOFA for project administrative costs. These costs include expenses related to the overall administration of the grant (24 CFR part 578.59), such as management, coordination, monitoring, and evaluation activities and environmental review.

Match

Match is actual cash or in-kind resources contributed to the grant. 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. All grant funds must be matched with an amount no less than 25% of the awarded grant amount (excluding the amount awarded to the leasing budget line item) with cash or in-kind resources. Match resources may be from public (not statutorily prohibited by the funding agency from being used as a match) or private resources, including the cash value of services provided by healthcare, supportive service or housing providers.

Leverage

Leverage is the non-match cash or non-match in-kind resources committed to making a CoC Program project fully operational. This includes all resources <u>in excess of</u> the required 25 percent match for CoC Program funds as well as other resources that are used on costs that are ineligible in the CoC Program. Leveraged match can include services provided by healthcare or housing providers not funded by the CoC or ESG programs.

Leverage funds may be used for any program related costs, even if the costs are not budgeted or not eligible in the CoC Program. Leverage may be used to support any activity within the project provided by the recipient or subrecipient.

HUD COC NOFO RESOURCES:

- COC Program Interim Rule (24 CFR part 578)
 http://www.govinfo.gov/content/pkg/CFR-2018-title24-vol3/xml/CFr-2018-title24-vo3-part578.xml
- Code of Conduct for HUD Grant Programs:

https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants

- Training and Resources: www.hudexchange.info/homelessness-assistance/
- **Listserv:** www.hudexchange.info/mailinglist
- HUD.GOV Email Addresses
- cocnofo@hud.gov for questions about the NOFO, competition and applications;