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FY 2023 Continuum of Care (CoC) Program Local Competition Policies and Procedures

NOTE: LOCAL COMPETITION DUE DATE IS AUGUST 29, 2023

Background and Introduction

Organization

Total Care for the Homeless Coalition (TCHC) is the HUD designated Continuum of Care for the upper eastern region of South Carolina. The counties included in the CoC service area include Chesterfield, Clarendon, Darlington, Dillon, Florence, Georgetown, Horry, Kershaw, Lee, Marlboro, Marion, Sumter, and Williamsburg.

HUD's Continuum of Care Program Competition

Each year, the US Department of Housing and Urban Development (HUD) makes available federal resources for homeless services to communities around the nation through its Continuum of Care Program Competition. CoC's access these funds by completing a Consolidated Application on behalf of the local homeless service provider agencies. Any agency located in the CoC service area interested in applying for these funds must participate in local homeless planning efforts and TCHC's local CoC Competition for funding. As such, it is the responsibility, annually, of the CoC to ensure that the best possible applications are submitted to HUD.

Purpose of this Document

This document describes the policies and procedures for the FY 2023 CoC Competition, including:

- Publish the CoC Program Competition funding availability and local procedures;
- Make available the link to the FY 2023 Notice of Funding Opportunity (NOFO);
- Announce the availability of the Domestic Violence (DV) Bonus Funding;
- Publish project application due dates;
- Publicly notify that the links to the 2023 CoC New Project Rating Form and the 2023 Renewal or Expansion Project Rating form will be released in the upcoming weeks;
- Make available the CoC Operational Policy and Guidelines, this includes policies and procedures

for the local competition process. Policies and Procedures for Renewal and New Grant Applications, Including Reallocated Funding can be found here:

TCHC Ranking, Scoring, Reallocation, and Monitoring Policies

FY 2023 CoC Program Notice of Funding Opportunity (NOFO)

The FY 2023 NOFO establishes the funding criteria for the Continuum of Care (CoC) Program. The CoC Program is designed to promote a community-wide commitment to the goal of ending homelessness, including providing funding for efforts by nonprofit providers, States, and local governments to quickly re-house homeless individuals, families, youth, persons fleeing domestic violence, dating violence, sexual assault, and stalking. The NOFO determines the framework for the CoC to abide by for the local competition and allows for the CoC to determine local deadlines, local priorities, and ultimately provide a slate of projects to be recommended to HUD for funding ranked in order of priority.

Click this link to review the FY2023 Notice of Funding Availability

FY 2023 CoC Program Competition Overview and Timeline

TCHC's HUD Collaborative Applicant and HUD Grant Applications Selection Committee is responsible for the local CoC program competition grant applications process. This committee will score and rank the submitted applications and present a slate of applications recommended for funding to the CoC Board of Directors.

All applicants will be required to submit their full application in e-snaps. Applications submitted within the approved competition timeline will undergo a technical review to determine if the project meets HUD and CoC thresholds as well as ensure that the application narratives are fully responsive to the questions, proposed program participants are an eligible population for the CoC program, the proposed project type is eligible, all budget line items are an eligible activity and cost type, and that data is consistent throughout the application. If a project meets all HUD and CoC thresholds the project application will then be evaluated, scored, and ranked.

For more information, please review Section III of the CoC Operational Policy and Guidelines that can be found on the TCHC website.

As stated in Section II.A of the FY 2023 CoC Program Competition NOFO, approximately \$3,134,000,000 is available in the FY 2023 CoC Program Competition NOFO, including at least \$52 million available for Domestic Violence (DV) Bonus projects, described in Section I.B.2.b.(8) and I.B.3.I of the NOFO. All requirements in the FY 2023 application process, including requirements for the entire CoC Consolidated Application and the total amount of funds available, are included in the FY 2023 NOFO.

CoC Number and Name	PPRN	Estimated ARD	Tier 1	CoC Bonus	DV Bonus	CoC Planning
SC-503 Myrtle Beach, Sumter City & County CoC	\$4,250,880	\$3,232,042	\$3,005,799	\$297,562	\$425,088	\$212,544

For additional resources, including detailed Instructions for Renewal Applications, New Project Applications and instructional guides for e-snaps please <u>click here</u>. Please keep in mind that this is updated by HUD and as of the date of this publication not all of the resources are available.

Threshold Requirements:

In order to be eligible to apply for CoC funding the following CoC Threshold Requirements must be met:

- Housing First and Low Barrier Implementation;
- Documented, secured minimum match;
- Applicant is an active CoC participant;
- Application is complete and data is consistent;
- Acceptable organizational audit/financial review;
- Project Costs are eligible (24 CFR 578 Subpart D);
- Participate in mandatory e-snaps training provided by the CoC for this NOFO.

Local Competition Timeline:

Local Process Opens: July 26, 2023

August 1, 2023, 3pm -4:30pm:

Local Competition Virtual Training held via zoom. Zoom: <u>https://us02web.zoom.us/j/4946214139</u> Meeting ID: 494 621 4139 Phone: 1 929 205 6099

August 9, 2023, 1pm – 4pm: Mandatory E-Snaps Training

Will be held at the Bevis Training Center located at the Pee Dee Mental Health Center (125 East Cheves Street, Florence, SC 29506)

Renewal Grant Applications:

August 29, 2023: Renewal Application Deadline

Please ensure all renewal applications are submitted in e snaps. Applicants then **export the PDF and email to <u>tchc.coc.secretary@gmail.com</u>.** Do not press submit. In addition to submitting renewal applications in esnaps all applicants must send the following documents to <u>tchc.coc.secretary@gmail.com</u>.

- 1. Supplemental Narratives
- 2. Organizations most recent audit or financial statement
- 3. Board Roster identify any board members that have lived experience with homelessness
- 4. Policy and procedure on screening participants for potential mainstream benefits and specific plan for helping them access those benefits.

- Policy and procedure or outreach logs that describe or document how the program applicant conducts outreach outside of the organization, specifically individuals and families that are least likely to ask for housing resources.
- 6. Fair Housing Policy
- 7. Policy ensuring that self-reported sexual orientation and gender identity are respected (Equal Access to Housing Final Rule).

New Project Applications:

August 29, 2023: New Project Application Deadline.

Please ensure all renewal applications are submitted in e snaps. Applicants then **export the PDF and email to** <u>tchc.coc.secretary@gmail.com</u>. Do not press submit. In addition to submitting renewal applications in esnaps all applicants must send the following documents to tchc.coc.secretary@gmail.com.

- 1. Supplemental Narratives
- 2. Board Roster identify any board members that have lived experience with homelessness
- 3. Organizational Bylaws
- 4. Organization Policy and Procedure/Operational Manual
- 5. Project Policy and Procedure/ Operational Manual
- 6. Organizations most recent audit or financial statement
- 7. Financial Policies and Procedures (if not included in one of the above-mentioned documents)
- 8. Fair Housing Policy
- 9. Policy ensuring that self-reported sexual orientation and gender identity are respected (Equal Access to Housing Final Rule)

(If applicant currently receives a HUD CoC funded grant, please ignore these additional documents. These documents are reviewed during the CoC monitoring and will be considered during the review and ranking process)

9/1/2023 – 9/10/2023 – The CoC Grant Technical Review Committee will technically review submitted applications to ensure they are complete, data is consistent, and budgets include eligible costs. The HUD Grant Applications Selection Committee will review, rank, and score submitted applications that meet the application threshold on the "Continuum of Care New Project Rating Form 2023".

9/12/2023 – Special CoC Board meeting to approve Ranked Project listing presented by the HUD Grant Applications Selection Committee.

9/13/2023 - Applicants will be notified if their application will be included in the ranked project list submitted in the Collaborative Application submitted to HUD. All

appeals must be submitted within three days of this notification.

Grantees submit in e-snaps by September 22, 2023

Applicant Appeals Process:

Applicants may appeal a scoring and ranking decision if they believe that the score they were given was unsubstantiated by project performance, or if they believe the score indicates a violation of one of TCHC's written policies. Appeals regarding information that was not submitted in the original application will not be considered. Appeals must be in writing and submitted to the TCHC Secretary, tchc.coc.secretary@gmail.com, through email within three business days of the notification email being sent. The Projects Scoring sub-committee will meet to discuss any appeal that is received. The sub-committee will review the appeal, the reason, and make a determination as to whether a score and/or ranking decision should be altered based on the reason for the appeal. The decision of the sub-committee will be transmitted to the Board of Directors for their concurrence. The Board's decision will be posted on the website and an email message sent to the applicant.

Upon completion of the above process the ranked projects list will be added to the annual CoC application to HUD.

Eligible Projects and Bonus Projects:

Renewal Projects:

Renewal project applications must be submitted by the same recipient that signed the executed grant agreement for the grant being renewed, or entity that became the recipient through a grant agreement transfer amendment. To be eligible as a renewal project, the application must (1) be for the same amount of funding before any adjustments described in the FY2023 NOFO (e.g. FMR adjustments), or the amount reduced due to reallocation of a CoC project; (2) be for the same program component; (3) in the case of CoC renewal projects, must continue to serve program participants who are enrolled in the project under the project's current grant agreement; and (4) in the case of DV Bonus renewal projects, must continue to serve the same subpopulation.

Subject to HUD approval and the terms of the NOFO, the following requests may be included in a renewal application:

- A. CoC renewal project applications may include requests to add eligible activities to a project, shift up to 10% of funds from one approved eligible activity to another, and change the subpopulation served.
- B. DV Bonus renewal project applications may include requests to add eligible activities to a project and shift up to 10% of funds from one approved eligible activity to another.

Renewal applications that include requests to shift more than 10 percent of funds from one approved eligible activity to another will not be considered during the CoC Program Competition by HUD. If an application includes a budget shift that exceeds 10%, HUD will correct the project budget to reflect the previously awarded budget amounts.

New CoC Bonus Projects:

CoCs may submit new projects created through reallocation, CoC Bonus, DV Bonus, or a combination of reallocation and CoC Bonus. The following project types are available:

- A. Permanent Supportive Housing (PH-PSH)
 - a. New PH-PSH project must serve one of the following:
 - persons eligible to be served by DedicatedPLUS projects as described in section I.B.2.b.(7) of the FY 2023 NOFO in which case all units funded by the project must be used to serve program participants who meet the qualifications for Dedicated PLUS; or
 - ii. persons who are experiencing chronic homelessness (see 24 CFR 578.3 definition of Chronically Homeless) at the time they initially enroll in the project.
- B. Rapid Rehousing (PH-RRH) projects must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 Section 103(b) of the McKinney-Vento Homeless Assistance Act.
- C. Joint Transitional Housing and Rapid Rehousing (TH/PH-RRH) projects must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 Section 103(b) of the McKinney-Vento Homeless Assistance Act.
- D. SSO- Coordinated Entry (SSO-CE) Project to develop or operate a centralized or coordinated assessment system. Projects must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3 Section 103(b) of the McKinney-Vento Homeless Assistance Act.
- E. Dedicated HMIS projects that can only be carried out by the HMIS Lead listed in the CoC Applicant Profile in e-snaps. Eligible costs under a Dedicated HMIS grant can be found at 24 CFR 578.57(a).

New Domestic Violence Bonus Projects:

DV Bonus funds can be applied for by an eligible applicant for projects that are dedicated to persons actively fleeing or are survivors of domestic violence, dating violence, sexual assault, human trafficking, or stalking who qualify under the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act. DV Bonus funding may be used for new projects and/or to expand an existing renewal project that is not dedicated to serving persons fleeing and/or survivors of domestic violence, as defined above, so long as the DV Bonus funds for expansion are solely used for additional units, beds, or services dedicated to persons eligible to be served with DV Bonus funding.

A CoC may apply for the following types of DV Bonus projects:

- A. Rapid Re-housing (PH-RRH)
- B. Joint Transitional Housing and Rapid Rehousing (Joint TH/PH-RRH) component projects
- C. SSO Projects for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of people experiencing homelessness who are survivors of domestic violence, dating violence, or stalking (e.g., to implement policies

and procedures that are trauma-informed, client-centered or to better coordinate referrals between the CoC's coordinated entry and the victim service providers coordinated entry system where they are different). <u>CoCs may only submit one SSO-CE project per fiscal year competition.</u>

Rapid Rehousing and Joint TH/PH-RRH component projects must follow a Housing First approach.

Transition Grants

A Transition grant can be used to transition an eligible renewal project, being eliminated through reallocation, from one program type to another eligible project type over a one-year period. For a new project to be considered a Transition grant, the applicant for the new project must be the recipient listed on the current grant agreement for the eligible renewal grant being transitioned through reallocation. The definition of the grant and process is defined in Section I.B.2.b.(30) of the FY 2023 NOFO. Transition grants in this competition are eligible for renewal in subsequent fiscal years for eligible activities of the new program component. The new transition project must meet the following requirements to be eligible:

- A. The current renewal project recipient must have the consent of its Continuum of Care; and
- B. The new project application must meet project eligibility and project quality thresholds established by HUD in sections III.C.5.b and c. of the NOFO.

Recipients of an eligible renewal project that are interested in applying for a new Transition grant must notify the Total Care for the Homeless Coalition in writing by email fifteen days prior to the local project application submission date. The Total Care for the Homeless Coalition will work with recipients that have requested a Transition grant to determine if the transition from one project type to another is eligible, feasible, and is in line with CoC priorities.

Transition grants HUD conditionally awards in the FY 2023 CoC Program Competition will have one year to fully transition from the original project type to the new project type during the normal operating year once HUD executes the grant agreement.

Expansion Projects

The process by which a renewal project applicant submits a new project application to expand its current operations by adding units, beds, persons served, services provided to existing program participants, or in the case of a SSO-CE or HMIS grant, increase the current activities within the CoC's geographic area. DV Bonus funds can be used to expand an existing renewal project if the expansion project is dedicated to persons fleeing and/ or fleeing domestic violence, dating violence, sexual assault, human trafficking, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act. Only the new project application for the expansion will be considered for DV Bonus funds in these situations. The expansion project (i.e., the existing renewal project and the new expanded portion of the project) must meet the conditions below:

- A. The renewal project and the new expanded portion of the project must both have the same component type.
- B. Eligible project components for new expansion grants: PH-PSH, PH-RRH, Joint TH/PH-RRH, SSO-CE, or HMIS. The new expanded portion of the project may be funded through reallocation, CoC bonus, or DV Bonus.
- C. If using DV Bonus funds, the new expanded portion of the project is solely for additional units, beds, or services dedicated to persons fleeing and/ or survivors of domestic violence, dating violence, human trafficking, or stalking as defined above.

Once an expansion grant and its accompanying renewal application are submitted and the CoC accepts and ranks the applications the applicant will then submit a combined application to be submitted in e-snaps.

Consolidated Projects

Eligible renewal project applicants will continue to have the ability to consolidate two or more eligible renewal projects (but no more than ten projects) into one project application during the application process. The projects being combined during a grant consolidation will continue uninterrupted. To be eligible for consolidation, the projects must have the same recipient and be for the same component and will be funded in this competition only with FY 2023 funds (meaning no funds recaptured from prior years will be awarded to the project). HUD will not permit projects with the following characteristics to consolidate:

- A. outstanding audit or monitoring findings,
- B. outstanding obligation to HUD that is in arrears,
- C. unresolved construction delays,
- D. history of poor financial management or drawdown issues,
- E. history of low occupancy levels, or lack of experience in administering the project type, or
- F. other capacity issues.

HUD will not permit a transitional housing and a permanent housing project to consolidate to form a Joint TH and PH-RRH component project and will not permit a transition grant to be consolidated with any other project. If a project meeting these characteristics attempts to consolidate as part of the project application process, the submitted consolidated project will be rejected by HUD during the application review process.

To apply for a consolidated grant, applicants must submit separate renewal project applications and supplemental applications for each of the grants that are proposed to be consolidated, and an application for the new consolidated grant with the combined budget and information of all grants proposed for consolidation. Project applications for the grants that are proposed to be consolidated will be ranked, and if all those grants are selected, HUD will award the single consolidated grant. If one of the grants proposed to be consolidated is found to be ineligible for consolidation or is not selected, HUD will award all grants that are eligible for renewal and selected as separate grants. See Section III.B.4.b.(8) of the FY 2023 NOFO for additional requirements.

Youth Homeless Demonstration Program (YHDP)

Total Care for the Homeless Coalition was awarded a YHDP grant during the FY 2021 NOFO competition. These grants have not been fully awarded by HUD at this time and therefore are not part of the FY 2023 CoC NOFO Competition.

Changes from the Previous NOFO:

CoC Planning Grant Increases:

HUD is establishing an alternative maximum amount for CoC Planning grant applications under this NOFO. Specifically, the maximum grant amount for CoC planning activities under 24 CFR 578.39 will be the greater of \$50,000 or 5% of the applicable Final Pro Rata Need (FPRN). This new maximum replaces the 3 % cap in 24 CFR 578.39(a) for the purposes of awards under this NOFO.

New Eligible CoC Activities:

The following new budget line items will be available starting with this year's CoC Program Competition:

A. VAWA Activities - Section 605(a)(2) of VAWA 2022 amends section 423(a) of the McKinney-Vento Homeless Assistance Act to add the following eligible activity to the CoC program: "Facilitating and coordinating activities to ensure compliance with the emergency transfer plan requirement in 34 U.S.C. 12491(e) and monitoring compliance with the confidentiality protections in 34 U.S.C. 12491(c)(4)."

Examples of eligible costs for emergency transfer facilitation include the costs of assessing, coordinating, approving, denying, and implementing a survivor's emergency transfer which includes:

- i. Assistance with moving costs. Reasonable moving costs to move survivors for an emergency transfer.
- ii. Assistance with travel costs. Reasonable travel costs for survivors and their families to travel for an emergency transfer.
- iii. Security Deposits. Grant funds can be used to pay for security deposits of the safe units the survivor is transferring to via an emergency transfer.
- iv. Utilities. Grant funds can be used to pay for costs of establishing utility assistance in the safe unit the survivor is transferring to.
- v. Housing Fees. Fees associated with getting survivor into a safe unit via emergency transfer, includes but not limited to application fees, broker fees, holding fees, trash fees, pet fees where the person believes they need their pet to be safe, etc.
- vi. Case management. Grant funds can be used to pay staff time necessary to assess, coordinate and implement emergency transfers.
- vii. Housing navigation. Grant funds can be used to pay staff time necessary to identify safe units and facilitate moves into housing for survivors through emergency transfers.
- viii. Technology to make an available unit safe. Grant funds can be used to pay for technology that the individual believes is needed to make the unit safe, including but not limited to doorbell cameras, security systems, phone and internet service when necessary to support security systems for the unit, etc.

Examples of eligible costs for monitoring compliance with the VAWA confidentiality requirements includes:

- i. Monitoring and evaluating compliance with VAWA confidentiality requirements.
- ii. Developing and implementing strategies for corrective actions and remedies.
- iii. Program evaluation of confidentiality policies, practices and procedures.
- iv. Training on compliance with VAWA confidentiality requirements.
- v. Reporting to Collaborative Applicant, HUD and other interested parties on compliance with VAWA confidentiality requirements.
- vi. Costs for establishing methodology to protect survivor information.
- vii. Staff time associated with maintaining adherence to confidentiality requirements.

These activities may be included in new project applications. Applicants wishing to utilize the new budget line items for their renewal projects can:

- i Submit an expansion project to expand their existing renewal grant to add new funding to these budget line items.
- ii Request a budget modification during the competition to shift up to 10% of funds from an eligible activity to one of the newly eligible budget line items.
- B. Rural Activities Section 5707 of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (PL 117-263, December 23, 2022, 136 Stat 2395) amends section 423(a) of the McKinney-Vento Homeless Assistance Act to include activities that address barriers to transitioning families in rural areas to permanent housing and additional activities to increase the capacity to address the unique challenges CoCs face when serving people experiencing homelessness in rural areas. The following activities are eligible:
 - (1) Payment of short-term emergency lodging, including in motels or shelters, directly or through vouchers.
 - (2) Repairs to units in which homeless individuals and families will be hours; or are currently not fit for human habitation.
 - (3) Staff training, professional development, skill development, and staff retention activities.

HUD has determined that this new eligible Rural cost category may be included in new project applications or added to eligible renewal projects through expansion. A list of CoCs located in rural areas will be published by HUD.

Amendments to Category 4 Homeless Definition:

For purposes of the CoC Program and other HUD programs authorized by the McKinney-Vento Homeless Assistance Act, section 605 of VAWA 2022 amended section 103(b) of the McKinney-Vento Homeless Assistance Act to require HUD to consider as homeless:

any individual or family who-

 is experiencing trauma or a lack of safety related to, fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized;

- (2) has no other safe residence; and
- (3) lacks the resources to obtain other safe permanent housing.

This statutory change took effect on October 1, 2022. Rulemaking will be needed to require Continuums of Care (CoCs) and CoC Program recipients and subrecipients to make corresponding changes to the applicable written standards, coordinated entry policies, and documentation policies used to qualify individual and families as homeless under the CoC Program. That said, because HUD must recognize as "homeless" families and individuals who meet the new statutory criteria in section 103(b) of the McKinney-Vento Homeless Assistance Act as of October 1, 2022, CoC recipients may implement the new definition prior to HUD rulemaking, provided that CoCs update the relevant written standards and policies as needed to reflect the new statutory criteria. For further information, please see "<u>The Violence Against</u> <u>Women Act Reauthorization Act of 2022: Overview of Applicability to HUD Programs</u>" which HUD published in the Federal Register on January 4, 2023.

Federal Relay Service's Text Telephone (TTY) Service:

The Federal Relay Service contract expired in February 2022 and is no longer available. The NOFO is updated to include the use of Federal Communications Commission (FCC) relay services for individuals who are deaf or hard of hearing, or who have speech or communication disabilities. To learn more about how to make an accessible telephone call, please visit

<u>https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs</u> for more information on relay services available.