



LOCAL COMPETITION, SCORE, AND RANKING PROCEDURES FOR THE FY 2024 ANNUAL COC COMPETITION

TOTAL CARE FOR THE HOMELESS COALITION (SC-503)

Due September 30, 2024

INTRODUCTION AND BACKGROUND

Organization

Total Care for the Homeless Coalition (TCHC) is the HUD (Housing and Urban Development) 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

The U.S. Department of Housing and Urban Development (HUD) released the [Notice of Funding Opportunity \(NOFO\) for Fiscal Year 2024 and 2025 Continuum of Care \(CoC\) Competition](#) on July 31, 2024. The purpose of the funding is to promote a community-wide commitment to the goal of ending homelessness and to provide funding for efforts by nonprofit providers, states, local governments, and Indian Tribes or tribally designated housing entities to quickly rehouse homeless individuals, families, youth, 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.

In FY (Fiscal Year) 2024, HUD will continue to require Collaborative Applicants to rank all projects, except CoC planning and UFA Costs, in two tiers. Tier 1 is equal to 90 percent of the combined Annual Renewal Amounts (ARA) for all projects eligible for renewal. Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus funds that a CoC can apply for but does not include projects selected with Domestic Violence (DV) Bonus funds. All new and renewal projects, except the planning grant, will need to be ranked within the two tiers.

As stated in Section II.A of the FY 2024 CoC Program Competition NOFO, approximately \$3,524,000,000 is available in the FY 2024 CoC Program Competition NOFO, including at least \$52 million available for Domestic Violence (DV) Bonus projects, described in Section I.B.2.b.(6) and I.B.3.j of the NOFO. All requirements in the FY 2024 application process, including requirements for the entire CoC Consolidated Application and the total amount of funds available, are included in the FY 2024 NOFO.

PURPOSE OF THIS DOCUMENT

This document describes the policies and procedures for the FY 2024 CoC Competition, including:

- Publish the CoC Program Competition funding availability and local procedures;
- Make available the link to the FY 2024 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 2024 CoC New Project Rating Form and the 2024 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](#)

CHANGES FROM PREVIOUS NOFO

Changes to Tiering:

Tier 1 is set at **90 percent** of the CoC's Annual Renewal Demand (ARD). In FY 2023 Tier 1 was set at 93 percent.

2-Year NOFO:

The Consolidated Appropriations Act, 2024, authorizes HUD to issue a single two-year NOFO for fiscal years 2024 and 2025.

The application and selection process for FY 2024 funds through this NOFO will follow a similar procedure as in previous years. However, for FY 2024 and FY 2025, CoCs need to submit only one CoC application. HUD reserves the right to award FY 2025 funds based on this NOFO competition. Projects awarded FY 2024 funds may be eligible for FY 2025 funds using their FY 2024 application, and do not need to reapply for FY 2025 renewal.

CoC renewal projects expiring in CY 2025 (January 1, 2025, to December 31, 2025) can be renewed with FY 2024 CoC funds. Projects eligible for renewal with FY 2025 CoC Program funds must have an expiration date in CY 2026 (January 1, 2026, to December 31, 2026). If appropriated funds are insufficient to fully cover all FY 2025 renewal grants, amounts may be reduced proportionately.

If new competitive funding becomes available for FY 2025, this NOFO may be amended, and the FY 2024–2025 CoC application and score may be used for the FY 2025 selection process. Applications for FY 2025 CoC renewal projects and new projects created through CoC and/or DV reallocation must be submitted in e-snaps by August 29, 2025. HUD also reserves the right to modify this NOFO or issue a supplemental FY 2025 CoC NOFO if necessary, such as to accommodate new CoC priorities or funding sources.

Funding for Specific Subpopulations:

In the FY 2024 NOFO competition, HUD requires funding reallocated from projects previously funded with DV Bonus funding to continue to be used for projects dedicated to serving the same subpopulation. Therefore, prior to executing the reallocation of any project, HUD strongly recommends reviewing the Grant Inventory Worksheets (GIWs) published on the CoC Program Competitions page on the HUD.gov website to determine the type of new projects that can be created with reallocated funding intended for the specific subpopulations.

DV Reallocation:

In this NOFO, HUD has expanded reallocation to include DV Reallocation. HUD establishes these terms to distinguish between funding sources that must continue to serve the same populations of the projects being reallocated.

HUD is establishing a definition of DV reallocation to implement a congressional directive that requires projects previously funded using DV Bonus funds to continue to serve the same population, even when projects are reallocated. CoCs may reallocate eligible Renewal projects that were previously funded, in whole or in part, with DV Bonus funding to create DV Reallocation projects that are dedicated to serving the same population. New DV Reallocation projects must be 100 percent dedicated to serving individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking who qualify under paragraphs (1) or (4) of the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act [see sections I.B.2.b.(24) and III.B.4.a.(4) of the NOFO for more information].

Cost of Living Adjustments for Conditionally Selected Grants:

The Consolidated Appropriations Act, 2024 authorizes HUD to make reasonable cost of living adjustments to renewal amounts to help afford increasing cost of operations due to inflation. See section V.D.2. of the NOFO for more information.

ELIGIBLE APPLICANTS

Non-profit organizations and units of local government that have the capacity to administer federal funding and have experience administering programs and services that assist people experiencing homelessness and/or a housing crisis are eligible to apply for FY 2024 HUD CoC funding. New applicants should submit an intent to apply form by September 16th. Click here to access forms: [24-25 NOFO - Intent to Apply - TCHC | Total Care for the Homeless Coalition \(tchcsc.org\)](#)

AVAILABLE FUNDING, ELIGIBLE PROJECTS, AND BONUS PROJECTS

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-Ranking Scoring Reallocation Monitoring Policies.pdf](#)

AVAILABLE FUNDING

CoC Number and Name	Estimated ARD	Tier 1	CoC Planning	CoC Bonus	DV Bonus
SC-503 -Sumter City & County CoC	\$4,768,251	\$3,011,727	\$247,400	\$593,760	\$742,200

LOCAL COMPETITION TIMELINE

The CoC is requesting renewal applications and new applications that meet the criteria for a bonus project, including the DV bonus, or that would provide rapid rehousing or permanent supportive housing using reallocated or DV reallocated funds, if made available.

- 1. NOFO Applicant Meeting.** All applicants interested in applying for funds through the local competition should have at least one staff member attend the virtual meeting on **September 10 at 1:00pm**. The meeting will consist of a brief overview of the FY 2024 CoC NOFO, the local competition timeline and process, and a question-and-answer period. The meeting link will be distributed through the TCHC listserv. If needed, please email tchc.coc.secretary@gmail.com for the meeting link.
- 2. MANDATORY E-SNAPS & All Applicant Meeting.** This required “All Applicant Meeting” will be held in Florence at the Bevis Training Center located at the Pee Dee Mental Health Center (125 East Cheves St, Florence SC 29506). Training information will be sent to applicants who submit their intent to apply prior to September 16, 2024. Click here to access forms: [24-25 NOFO - Intent to Apply - TCHC | Total Care for the Homeless Coalition \(tchcsc.org\)](#)
- 3. Project Applications Due for Rating and Ranking.** All e-snaps project applications and supplemental document (outside of e-snaps) are required to be submitted to the CoC **Monday, September 30, 2024**. Email a copy of the project application exported from e-snaps and the Supplemental documents to tchc.coc.secretary@gmail.com

Please ensure all applications are submitted in e snaps. Applications are then **export the PDF and emailed to tchc.coc.secretary@gmail.com. Do not press submit!**

- 4. Rating and Ranking.** Raters will review applications individually between **October 1, 2024, and October 11, 2024**, The CoC Board will meet to review and approve the ranked project list October 15, 2024.
- 5. Project Applicant Notification.** Applicants will be notified through written notification outside of e-snaps by **October 15, 2024**. The notification will indicate if your project(s) will be included in the CoC

Application to HUD, the ranked position of your project(s) in the CoC Tiered Ranking, and the funding amount the project is being submitted for.

6. **Applicant appeals process.** CoC project applicants who have specific concerns regarding the review and scoring of their application may file an appeal starting **October 15, 2024**, through **October 18, 2024**. Appeals will only be considered in cases where the applicants have material concerns specific to the review process and scoring of their application. Please see the Appeals Process section contained later in this document for more information.
7. **Rating and Ranking Debrief.** Applicants that receive notification that their application is being included in the CoC Application to HUD will receive a written rating and ranking debrief by **October 18, 2024**. The debrief will contain any revisions to the e-snaps application the committee deemed necessary and any suggestions to strengthen the application. Thereafter, applicants will have the opportunity to revise and strengthen applications based on the debrief.
8. **Revised Project Applications Due.** Revised project applications are due to the CoC in e-snaps on or before **October 23, 2024**.
9. **Posting of Full Application.** The CoC will post the full application, including the Collaborative Application, project applications, priority listing and all attachments to the TCHC website found here: <https://tchcsc.org/2024-nofo/> on **October 25, 2024**.
10. **HUD Submission.** The FY 2024 CoC Consolidated Application and FY 2024 Priority Listing will be submitted to HUD in e-snaps by **8:00 pm on October 30, 2024**.

PROJECT APPLICATION REVIEW AND OVERSIGHT

HUD expects each CoC to implement a thorough review and oversight process at the local level for both new and renewal project applications submitted to HUD in the FY 2024 CoC Program Competition. To meet this expectation, the CoC closely reviews information provided in each project application in order to ensure that:

1. All proposed program participants will be eligible for the program component type selected;
2. The proposed activities are eligible under the 24 CFR part 578;
3. Each project narrative is fully responsive to the question being asked and that it meets all of the criteria for that question as required by the NOFO and included in the detailed instructions provided in e-snaps;
4. The data provided in various parts of the project application are consistent; and
5. All required attachments correspond to the attachments list in e-snaps and the attachments contain accurate and complete information, and are dated between May 1, 2024, and October 30, 2024.

SUPPLEMENTAL APPLICATION

All renewal and new projects are required to submit a supplemental document along with their project application. The CoC supplemental components and narratives serve to: (1) confirm the capacity of agencies to provide CoC funded programs; (2) provide information on program delivery in order to evaluate performance and

meeting HUD criteria for scoring and ranking of projects by the Rating and Ranking Committee (RRC); and (3) provide project level narrative to be utilized in the CoC Program application.

Renewal Grant Applications:

Please ensure all renewal applications are submitted in e snaps. Applicants then **export the PDF and email to tchc.coc.secretary@gmail.com. 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. 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.
5. 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:

Please ensure all renewal applications are submitted in e snaps. Applicants then **export the PDF and email to tchc.coc.secretary@gmail.com. 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)

All DV Bonus Applicants should also complete and submit a the DV supplemental narrative to tchc.secretary.coc@gmail.com.

YHDP

Current YHDP grantees are required to submit a renewal application for the existing YHDP Project. Applications for YHDP Renewal are not competitively ranked, and therefore must be excluded from CoC ranking. These non-competitive applications are also excluded from the Tier 1 and Tier 2 selection process.

RATING CRITERIA

Each of the questions included in the Supplemental Project Applications corresponds to criteria articulated in the Department of Housing and Urban Development's Rating and Ranking Tool and the FY 2024 CoC NOFO. An overview of the rating criteria that will be considered during the rating and ranking process is provided below. According to guidance from HUD, the CoC uses objective, performance-based scoring criteria and selection priorities that are approved by the CoC to determine the extent to which each project addresses HUD's policy priorities. [2024 NOFO - TCHC | Total Care for the Homeless Coalition \(tchcsc.org\)](#)

PREAPPLICATION AGREEMENT

The CoC requires project applicants to submit a pre-application agreement that will ask applicants to attest to their compliance with HUD Threshold criteria. These Assurances address issues such as compliance with federal law and standard accounting practices.

COC THRESHOLD CRITERIA

The CoC has established five threshold criteria. If an applicant does not meet these threshold requirements, their application will not be rated and submitted for consideration. These threshold criteria are:

- ✓ Coordinated Entry Participation
- ✓ Housing First Implementation
- ✓ Documented, secured minimum match of at least 25% of the CoC funds requested (excluding any amount in the leasing budget line item)
- ✓ Acceptable organizational audit/financial review
- ✓ Active participation in the CoC

COC LOCAL CRITERIA

The CoC local criteria ensure that applicants are responsive to local needs and requirements, while also meeting the standards laid out in the 2024 CoC NOFO. This is a high-level overview of the local criteria. The detailed Rating and Ranking tool will be made available to all project applicants and posted on the CoC's website as soon as possible.

New Projects

For new projects, these criteria address:

- ✓ Organization experience and capacity
- ✓ Design of housing and supportive services
- ✓ Timeliness
- ✓ Documented organizational financial stability
- ✓ Project effectiveness based on best practices

- ✓ Financial feasibility of project
- ✓ Cost per exit to permanent housing
- ✓ Application is complete and data is consistent throughout the application
- ✓ Serves a high need population
- ✓ Strategy to address those at risk of becoming homeless
- ✓ Strategy to reduce rate of returns to homelessness
- ✓ Identification of common factors of individuals that return to homelessness
- ✓ Street outreach
- ✓ Strategy to further fair housing and market housing and supportive services
- ✓ Assistance to clients to increase access to employment and non-employment cash resources
- ✓ Equity in leadership, governance, policies, and program participant outcomes
- ✓ Persons with lived experience are meaningfully involved in the project planning and review process

Additionally, rating criteria for specific new project types are included to ensure that HUD's minimum requirements for new projects are met.

Renewal Projects

For renewal projects, these criteria address:

- ✓ System Performance measures, including length of stay, exits to permanent housing, returns to homelessness, and new or increased income and earned income
- ✓ Serves a high need population
- ✓ Project effectiveness and use of best practices
- ✓ Financial feasibility of project
- ✓ Reasonable cost per exit to permanent housing
- ✓ Application is complete and data is consistent throughout the application
- ✓ Data quality is at or above 90%
- ✓ Bed/utilizations rates are at or above 75%
- ✓ Strategy to address those at risk of becoming homeless
- ✓ Strategy to reduce rate of returns to homelessness
- ✓ Identification of common factors of individuals that return to homelessness
- ✓ Street outreach
- ✓ Collaboration and Coordination
- ✓ Strategy to further fair housing and market housing and supportive services
- ✓ Assistance to clients to increase access to employment and non-employment cash resources
- ✓ Equity in leadership, governance, policies, and program participant outcomes
- ✓ Persons with lived experience are meaningfully involved in the project planning and review process

The Rating and Ranking Committee may also review information in the Line of Credit Control System (LOCCS); Annual Performance Reports (APRs); and information derived from monitoring, including monitoring reports and financial audit reports, as applicable, as well as performance standards on prior grants.

RATING AND RANKING PROCESS

All renewal and new applications will be reviewed by an unbiased review panel composed of representatives from neutral (non-applicant) organizations, referred to as the Rating and Ranking Committee (RRC). The RRC will drive the rating and ranking process and will adopt a rating and ranking tool that meets all HUD and CoC requirements.

RATING AND RANKING COMMITTEE MEMBERS

The Rating and Ranking Committee (RRC) is comprised of local representatives and consultants who are knowledgeable about homelessness and housing in our CoC and the best practices nationally and who are broadly representative of the relevant sectors, subpopulations, and geographic areas. These representatives will be comprised of a consulting firm that specializes in the CoC program and a cross-section of groups participating in the CoC, including faith-based providers, private sector, non-profit providers of homeless services and housing and jurisdiction staff. RRC members have no financial stake or interest in a CoC funded program.

TIERS

To ensure that CoCs have the opportunity to prioritize their projects locally in the event that HUD is not able to fund all renewals, HUD requires that CoCs rank projects in two tiers. Tier 1 is equal to 90 percent of the CoC's Annual Renewal Demand (ARD) minus the Annual Renewal Amounts (ARAs) of sYHDP renewal and YHDP replacement projects. Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, DV reallocation, and CoC Bonus funds that a CoC can apply for but does not include YHDP renewal or YHDP replacement projects, CoC planning projects, or projects selected with DV Bonus funds. All projects except the planning grant will be rated and ranked within two tiers.

PROJECT APPLICATION 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.

SOLO APPLICANTS

Project applicants whose project was rejected may appeal the local CoC competition decision to HUD if the project applicant believes it was denied the opportunity to participate in the local CoC planning process in a reasonable manner by submitting a Solo Application in e-snaps directly to HUD prior to the application deadline of 8:00 PM EST on October 30, 2024. See Section VII.C. in the FY 2024 NOFO for more information.

DENIED OR DECREASED FUNDING BY HUD

Eligible applicants, including project applicants and Collaborative Applicants, that submitted an application to HUD in response to this NOFO, that were either not awarded funds by HUD, or that requested more funds than HUD awarded, may appeal HUD's decision within 45 days after the final funding announcement. HUD will only consider for funding or additional funding applicants the CoC ranked within the CoC's maximum amount available.

Collaborative Applicants that submitted CoC planning, and if applicable, UFA Costs project applications can appeal

decreased funding if they can demonstrate HUD decreased the submitted project application's funding request to less than 5 percent of the CoC's FPRN or \$1,250,000; whichever is less. To appeal HUD's decision, the applicant must submit a written appeal to HUD, with a copy to the authorized representative from the CoC's designated Collaborative Applicant. The written appeal must include evidence demonstrating HUD error and follow the instructions in this section.

The applicant must submit its written appeal by email to snapsappeals@hud.gov, from the organization's email address on the organization's letterhead and signed by the authorized representative—electronic signatures are acceptable. For more information about denied or decreased funding by HUD please see section VII.D.1. and 2. In the FY 2024 NOFO.

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 FY2024 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 Projects:

Applicants may submit new projects created through reallocation, DV reallocation, CoC Bonus, DV Bonus, or a combination of reallocation/ DV reallocation and CoC Bonus/ DV Bonus.

Reallocation and CoC Bonus Projects:

The following project types are available for new projects funded through reallocation or the CoC Bonus:

- A. Permanent Supportive Housing (PH-PSH)
 - a. New PH-PSH project must serve one of the following:
 - i. persons eligible to be served by DedicatedPLUS projects as described in section I.B.2.b.(5) of the FY 2024 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).

Domestic Violence Reallocation and 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.

If an applicant proposes to use DV Reallocation funds to expand an existing renewal project that is not currently dedicated to serving individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking to dedicate additional beds, units, persons served, or services provided to existing program participants of this population, the entire project, including the renewal project being expanded, must serve 100 percent individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking who qualify under paragraphs (1) or (4) of the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act.

Applicants may apply for the following types of DV Reallocation and 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). CoCs may only submit one DV funded SSO-CE project per fiscal year competition.

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 2024 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.4.a and b. of the NOFO.

Recipients of an eligible renewal project that are interested in applying for a new Transition grant must notify TCHC in writing by email fifteen days prior to the local project application submission date. TCHC 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 2024 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 an 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, DV 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.
- D. If using DV reallocation funds, to expand an existing renewal project that is not currently dedicated to serving individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking to dedicate additional beds, units, persons served, or services provided to existing program participants of this population, the entire project, including the renewal project being expanded, must serve 100 percent individuals and families of persons experiencing trauma or a lack of safety related to fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking who qualify under paragraphs (1) or (4) of the definition of homeless at 24 CFR 578.3 or section 103(b) of the McKinney-Vento Homeless Assistance Act.

To apply for an expansion grant with CoC Bonus, DV Bonus, DV Reallocation, or CoC Reallocation funding, project applicants must submit separate new and renewal project applications and both projects must be ranked by the CoC with unique rank numbers. If both the new expansion project and the renewal project it expands are conditionally selected for funding by HUD, one grant agreement incorporating both approved project applications will be executed by HUD.

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 2024 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 fiscal 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.a.(7) of the FY 2024 NOFO for additional requirements.

RANKING AND HUD'S HOMELESS POLICY PRIORITIES

The scores from each Rating and Ranking Committee member will be computed and averaged for each project and entered into HUD's Rating and Ranking tool, which generates the preliminary project ranking list from highest to lowest average score. The CoC ranking committee will then discuss all projects and move up in ranking those project applications that the CoC determines are high priority, high performing, and meet the needs and gaps as identified in the CoC. The CoC considers the policy priorities established in the NOFO in conjunction with local priorities to determine the ranking of new and renewal project application requests.

CoCs should use objective, performance-based scoring criteria and selection priorities that are approved by the CoC to determine the extent to which each project addresses HUD's policy priorities. See Section I.A.4.b. of the NOFO for more information on HUD's homeless policy and program priorities. The following provides additional context regarding the selection criteria:

- **Ending homelessness for all persons.** In 2023, the United States Interagency Council on Homelessness (USICH) presented All In: The Federal Strategic Plan to Prevent and End Homelessness to the President and Congress. The plan is built around six pillars: three foundations — equity, data and evidence, and collaboration — and three solutions — housing and supports, crisis response, and prevention. The work funded through this NOFO will support the actions and strategies proposed within the pillars. To end homelessness, CoCs should identify, engage, and effectively serve all persons experiencing homelessness. 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, older adults, 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 and agencies to expand housing options, such as permanent supportive housing, housing subsidies, and rapid rehousing. Additionally, CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest periods experiencing homelessness to develop housing and supportive services tailored to their needs.
- **Using a Housing First approach.** Housing First prioritizes rapid placement and stabilization in permanent housing and utilizes housing as a platform for providing supportive services that improve a person's health and well-being. CoC Program funded projects should help individuals and families move quickly into

permanent housing without preconditions and ensure that participants can choose the services they need to improve their health and well-being and remain in their housing. Additionally, CoCs should engage landlords and property owners to identify housing units available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt client centered service practices. HUD encourages CoCs to assess how well Housing First approaches are being implemented in their communities.

- **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 high rates of physical and mental health challenges, including substance use disorders. CoCs should explore all available resources, including CoC and ESG (Emergency Solutions Grants) funded assistance, housing subsidies, health care programs, and other supportive services to help improve unsheltered people’s well-being and help them move as quickly as possible to permanent housing. CoCs should work with law enforcement and their state and local governments to enlist their support for housing people residing 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. 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.
- **Improving System Performance.** CoCs should be assessing the performance of all homelessness projects using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, rates of exit to permanent housing destinations). CoCs should review all projects eligible for renewal under the FY 2024 – 2025 CoC NOFO to determine their effectiveness in serving people experiencing homelessness, including their cost-effectiveness. The CoC Competition includes several options to help CoCs improve their effectiveness, including reallocation, expansion, and transition grants, and CoC’s should take advantage of these options to improve their overall performance. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies.
- **Partnering with Housing, Health, and Service Agencies.** Using cost performance and outcome data, CoCs should improve how all available resources are utilized to end homelessness. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and should:
 - Work closely with health care systems and agencies and assist program participants to obtain health care and supportive services, including behavioral health services, including those covered and financed by Medicaid. In addition, CoCs should develop 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.
 - Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing assistance 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 HUD-VASH, Mainstream Vouchers, Family Unification Program (FUP) Vouchers, Fostering Youth Independence (FYI) 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 program resources provided through the Homelessness Assistance and Supportive Services

Program (HOME-ARP) that was created through the American Rescue Plan. CoCs should also work with 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.

- Partner with local workforce development centers to improve employment opportunities.
- Work with Tribal organizations to ensure that Tribal members can access CoC-funded assistance when a CoC's geographic area borders a Tribal area.
- **Racial Equity.** In nearly every community, Black, Indigenous, and other people of color are over-represented in the homeless population. In this NOFO, HUD is emphasizing system and program changes to address racial equity within CoCs and projects. Responses to preventing and ending homelessness should address racial inequities to ensure successful outcomes for all persons experiencing homelessness using proven approaches, such as: partnering with a racially diverse set of community partners and people experiencing homelessness and partnering with organizations with experience serving underserved populations. CoCs should review local data, policies, procedures, and processes to identify barriers that result in racial disparities and take steps to eliminate barriers to improve racial equity and to address disparities.
- **Improving Assistance to LGBTQ+ Individuals.** Discrimination based on 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. Additionally, when considering which projects to select in their local competition to be included in their application to HUD, CoCs should ensure that all projects provide privacy, respect, safety, and access regardless of gender identity or sexual orientation. CoCs should also partner with organizations with expertise in serving LGBTQ+ populations.
- **Persons with Lived Experience/Expertise.** The people who know best what solutions will effectively end homelessness are those experiencing homelessness. HUD expects CoCs to include people with lived homeless expertise and experience in their local planning and decision-making processes. 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, developing local competition processes, monitoring, and evaluation. CoC leaders and community partners should prioritize hiring people who have experienced homelessness in areas where their expertise is needed.
- **Building an Effective Workforce.** Homeless assistance providers need effective, well supported staff to provide high quality assistance. Unfortunately, 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. To address this issue, 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. 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.
- **Increasing Affordable Housing Supply.** 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. 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. This NOFO awards points to CoCs that take steps to engage local leaders about increasing affordable and accessible housing supply.

New projects created through reallocation and/or DV reallocation will be ranked based on the performance of the renewal application which is being reallocated if the same organization is submitting the new project application. New projects created through reallocation and/ or DV reallocation that are applied for by a different organization than the one being reallocated from will be ranked based on the criteria set forth in the Rating and Ranking Tool for new project applications.

Any remaining projects not fitting in the amount allocated under Tier 1 are placed in Tier 2. The remaining projects selected for funding will be ranked and placed into Tier 2 until all Tier 2 funds are allocated. Projects that scored well but fell outside the pro rata share are encouraged to re-submit in a future competition.

Reallocation and DV reallocation is a process CoCs use to shift funds in whole or part from existing eligible renewal projects to create one or more new projects without decreasing the CoC's ARD. New projects created through reallocation and DV reallocation must meet the requirements set forth in Section I.B.3.a, III.B.4.a.(3) and the project eligibility and project quality thresholds established in sections III.C.4.a and b. of the FY 2024 NOFO. CoCs may only reallocate eligible renewal projects renewed by HUD during a previous CoC Program competition.

Reallocation provides CoCs with the opportunity to:

- A. Reallocate excess project funding, and
- B. Move funding from low-performing projects to newly created projects with the intent that the new projects will be higher performing.

It is the policy of the CoC that reallocation can occur through the following methods:

A. Voluntary Reallocation:

A recipient, as defined in 24 CFR §578.3, may voluntarily reallocate its existing project by reducing its project's annual renewal amount in whole or in part, as defined in 24 CFR §578. A recipient that voluntarily reallocates an existing project and wishes to create a new, eligible project, may submit a new project application to TCHC. Solicitation for voluntary reallocation will be made during the annual application process prior to the opening of the CoC competition which typically occurs during the summer or early fall. Solicitation for voluntary reallocation will occur once the Grant Inventory Worksheet (GIW) is released by HUD. If necessary, individual meetings will be scheduled with each participant to discuss project performance, HUD CoC priorities, and other factors that may affect future funding for each project.

B. Involuntary Reallocation:

The CoC will make reasonable efforts to ensure that projects meet performance standards and fulfill CoC guidelines' requirements before enforcing involuntary reallocation. If, after reasonable corrective efforts have been made, there continue to be deficiencies in project performance, then TTCHC may recommend the project for involuntary reallocation at the time of the rating and ranking.

A determination for involuntary reallocation will be made on the following criteria:

1. **Project Performance considers the type of project, its performance relative to that type, timely submission of Annual Performance Reports (APRs) to HUD, and timely expenditure of funds.** Reallocation will automatically be considered for any project submitting an APR or any other required reporting six months or more past its due date.
2. **Utilization and Effectiveness** factors bed/unit operating capacity and cost-effectiveness relative to project type and population served. Reallocation will automatically be considered for any project utilizing less than 80% of its bed/unit capacity for either the most recently completed project term/grant year, or the current year's Housing Inventory Count (HIC).

3. **Extent of participation in HMIS (or comparable database)** including but not limited to: bed coverage, data quality, participation in Coordinated Entry, and contribution to System Performance Measures.
 - All CoC-funded programs, including Victim Service Providers (VSPs), are expected to accept housing referrals solely from TCHC's Queue. VSPs may operate a comparable HMIS database but are still required to accept referrals directly from the Community Queue via HMIS for CoC-funded programs;
 - Must participate in Coordinated Entry case conferencing; and
 - Must contribute to meeting local System Performance Measurement goals, including data quality goals
4. **CoC Funding Priorities** as determined by the most recent CoC Notice of Funding Opportunity (NOFO) and/or other HUD-published priority listings, and CoC determined local funding priorities.

The CoC Rating and Ranking Committee (referred to herein as "the Committee,"), a TCHC sub-committee, will evaluate all projects requesting funding in consultation with Technical Review Committee, the most recent CoC Program Competition NOFO, HUD System Performance Measures, the CoC Strategic Plan, and other funder priorities to determine if any projects eligible for renewal should be reduced or eliminated to develop new projects. The Committee makes decisions about involuntary reallocation(s) during the CoC Rating and Ranking Committee meeting and the final Rating and Ranking recommendation is presented to TCHC Board for approval.

Recipients who administer a project selected for involuntary reallocation will receive notification, including the reasons for the reallocation, from the Collaborative Applicant agency in writing, outside of e-snaps.

C. Reallocation Conditions

For voluntary and/ or involuntary allocations, an entire grant can be reallocated, or a percentage of the grant can be voluntarily or involuntarily reallocated. For voluntary reallocation, the grantee must indicate the total percentage or dollar amount of their current award to be reallocated to other projects.

D. Reallocation Appeal Process

Recipients selected for involuntary reallocation may appeal the decision in writing to the Committee within seven (3) business days after notification of selection for involuntary reallocation. The written notification should provide justification for the continued need for the project(s) in question to maintain funding at its current renewal demand.

The Committee will review all appeals and provide a final recommendation to the TCHC within three (3) business days of receipt of the appeal.

E. Reallocated Funds

CoC program funds made available through involuntary reallocation may be used to develop one or more new projects. Should no viable new projects be identified, CoC program funds made available through involuntary reallocation may be available for the expansion of other eligible renewal projects, subject to current CoC funding priorities and HUD NOFO requirements.

F. Eligible Projects

The CoC may use reallocated funds to create the following projects:

1. New Permanent Supportive Housing (PSH) projects where all beds will be dedicated for use by chronically homeless individuals and families as defined in 24 CFR §578.3,
2. New Rapid Rehousing (RRH) projects for homeless individuals and families who enter directly from the streets or emergency shelters, youth up to age 24, and persons who meet the criteria of paragraph (4) of the definition of homelessness in 24 CFR §578.3,
3. New Joint Component projects which include Transitional Housing (TH) and Rapid Rehousing (RRH) in a single project to serve individuals and families experiencing homelessness, as defined in 24 CFR §578.3,
4. New dedicated Homelessness Management Information System (HMIS) projects as allowed per 24 CFR §578.3 or
5. Other eligible project types stated in the current year's HUD CoC NOFO.

The CoC may use DV reallocated funds to create the following projects:

1. Rapid Re-housing (PH-RRH)
2. Joint Transitional Housing and Rapid Rehousing (Joint TH/PH-RRH) component projects
3. 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). CoCs may only submit one DV funded SSO-CE project per fiscal year competition.

G. Wind-Down Responsibilities for Reallocated Projects

It is the responsibility of the agency whose original project is being reallocated to successfully place those currently receiving housing into another comparable or better housing and/ or services situation. New projects will accept clients from a project being wound down if the projects serve the same demographic population(s). TCHC may elect to assemble a committee to support any projects being wound down that request assistance from the Board in placing their existing clients into a new housing situation. However, the current grantee bears ultimate responsibility for successful placement of clients impacted by the dissolution of the project being wound down

Appendix A

2024 COC LOCAL COMPETITION REQUIRED SUPPLEMENTAL NARRATIVE

Project Name: _____

Agency Name: _____

Project Type: _____

Please answer the following questions in four pages or less, double spaced, times new roman type 12 font and attach to your application. Please email: tchc.coc.secretary@gmail.org.

1. Does the agency have under-represented individuals (BIPOC, LGBTQ+, etc.) in managerial and leadership positions? Yes No
2. Does the agency Board of Directors include representation from more than one person with lived experience (previously or currently experienced homelessness)? Yes No
3. Does your agency have a documented process for receiving and incorporating feedback from persons with lived experience during both the project planning and review process?
Yes No
(If Yes, please include a copy of this policy)
4. Has your agency reviewed internal policies and procedures with an equity lens and created a plan for the development and implementation of more equitable policies and procedures that do not impose undue barriers?
Yes No

If Yes, please describe the plan.

5. Has your agency reviewed program participant outcomes with an equity lens, including the disaggregation of data by race, ethnicity, gender identity, and/ or age?
Yes No

If Yes, please describe your findings.