

# FY 2022 CONTINUUM OF CARE NOFO LOCAL COMPETITION POLICIES AND PROCEDURES

# TOTAL CARE FOR THE HOMELESS (SC 503)

# INTRODUCTION AND BACKGROUND

The U.S. Department of Housing and Urban Development (HUD) released the <u>Notice of Funding Opportunity (NOFO) for</u> <u>the 2022 Continuum of Care Program (CoC) Competition</u> on August 1, 2022. The purpose of the funding is to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, states, Indian Tribes or tribally designated housing entities (as defined in section 4 of the Native American Housing Assistance and Self Determination Act of 1996 (25 U.S.C. 4103) (TDHEs)), and local governments to quickly rehouse homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth 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.

In FY 2022, 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 95 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 rated and ranked within two tiers.

As stated in Section I.D of the FY 2022 CoC Program Competition NOFO, approximately \$2,794,000,000 is available in the FY 2022 CoC Program Competition NOFO, including at least \$52 million available for Domestic Violence (DV) Bonus projects, described in Section II.B.5 of the NOFO. HUD may add to the total amount with any available funds that have been carried over or recaptured from previous fiscal years. All requirements in the FY 2022 application process, including requirements for the entire CoC Consolidated Application and the total amount of funds available, are included in the NOFO.

### **Continuum of Care Service Area**

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 Sumter, Clarendon, Lee, Darlington, Dillon, Florence, Marlboro, Kershaw, Chesterfield, Georgetown, Williamsburg, Marion, and Horry.

## AVAILABLE FUNDING

The following table provides the Preliminary Pro Rata Need (PPRN), Estimated ARD, Estimated ARD at 95 percent (Tier 1), CoC Planning, CoC Bonus, and DV Bonus amounts for each CoC listed. **HUD has not published this document as of the date of this document. The CoC will update this document once HUD publishes.** 

Preliminary Pro Rata Need	Estimated ARD	Tier 1	CoC Bonus	DV Bonus	CoC Planning
\$3,369,612	\$3,034,936	\$2,883,189	\$168,481	\$336,961	\$101,088

## ELIGIBLE PROJECT TYPES FOR COC BONUS PROJECTS

The following types of project applications will be eligible for submission in the FY 2022 CoC Competition:

### CoC Bonus:

- A. Permanent Supportive Housing (PH-PSH)
- B. Rapid Rehousing (PH-RRH)
- C. Joint Transitional Housing and Rapid Rehousing (TH/PH-RRH)
- D. Dedicated HMIS
- E. SSO- Coordinated Entry (SSO-CE)

### TRANSITION GRANTS

Programs are eligible to apply for Transition Grants in the 2022 competition where renewal projects can transition from one CoC Program component to another during the CoC Program Competition, the process is defined in Section III.B.2.cc. The new transition project must meet the following requirements:

- A. Transition grants in this Competition are eligible for renewal in subsequent fiscal years for eligible activities of the new program component; and,
- B. To be eligible to receive a transition grant, the renewal project applicant must have the consent of its Continuum of Care.
- C. The new project application must meet project quality thresholds established by HUD in Sections V.C.3.b and V.C.3.b and c of the NOFO.

### DOMESTIC VIOLENCE BONUS PROJECTS

Domestic Violence (DV) Bonus projects may apply for funding. DV Bonus funding may be used for new projects and/or to expand an existing renewal project that is not dedicated to serving survivors of domestic violence, dating violence, sexual assault, or stalking who meet the definition of homeless in paragraph (4) of 24 CFR 578.3 so long as the DV Bonus funds for expansion are solely 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 projects:

- A. Rapid Re-housing (PH-RRH) projects that demonstrate trauma-informed, victim-centered approaches.
- B. Joint TH and PH-RRH component projects as defined in Section III.B.2.q of the NOFO that demonstrate traumainformed, victim-centered approaches.
- 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 experience homelessness who are survivors of domestic violence, dating violence, or stalking (e.g., to implement policies and procedures that are traumainformed, 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).

Regardless of the type of project the CoC applies for, the grant term must be 1-year.

# 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 as defined in Section III.B.2.j. 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: 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 Bonus, and CoC bonus processes.
- C. If using DV Bonus funds, the new expanded portion of the project is solely for additional units, beds, or services dedicated to survivors of domestic violence, dating violence, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3.

Once an expansion and its accompanying renewal application are submitted and ranked, applicants will submit a combined application for the competition.

# 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 2022 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. or 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 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 V.B.4.(7) of this NOFO for additional requirements.

## LOCAL COMPETITION DEADLINES

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 funds, if made available.

 NOFO Applicant Meeting. All applicants interested in applying for funds through the local competition are encouraged to attend the NOFO meeting on <u>Wednesday</u>, <u>August 17, 2022 at 2:00PM</u>. The meeting will consist of a brief overview of the NOFO, the local competition timeline and process, and a question-andanswer period. Participants can join the virtual zoom meeting by following the link below:

# https://us02web.zoom.us/j/4946214139?pwd=REFBSFhhdVY1UIRGNmk5ZTIQTWdqZz09

### Meeting ID: 494 621 4139

### Passcode: 568218

2. **Project Applications Due for Rating and Ranking.** All renewal and new project e-snaps project applications are required to be submitted in e-snaps on or before <u>August 31, 2022.</u> Email a copy of the project application exported from e-snaps and the following documents to <u>tchc.coc.secretary@gmail.com</u>

### **Renewal Project Applications:**

• Policy and Procedures for Organization/ project that is applying for renewal, including HMIS and CES Policies

### New Project Applications:

- Organization Policy and Procedure/Operational Manual
- Financial Policies and Procedures (if not included in the above-mentioned documents)
- Organizational Bylaws

- Board Roster identify any board members that have lived experience with homelessness
- Organizations most recent audit or financial statement
- Questions: Questions related to the NOFO should be submitted in writing to the TCHC secretary by <u>August 23,</u> 2022. Responses will be posted on the TCHC website by <u>August 26, 2022</u>.
- Technical Review and Rating/ Ranking. The CoC Grant Technical Review Committee will technically review applications and send their findings to the HUD Grant Application Selection Committee who will score and rank all submitted applications that meet the CoC Threshold requirements from <u>September 1, 2022</u>.
- 5. **Special CoC Board Meeting.** The CoC Board will hold a special Board Meeting on **September 13, 2022** to approve the Ranked Project listing presented by the HUD Grant Application Selection Committee.
- Project Applicant Notification. Applicants will be notified through written notification outside of e-snaps by September 15, 2022. The notification will indicate if your project(s) will be included in the CoC Application to HUD, the ranked position of your project(s), and the funding amount the project is being submitted for.
- 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 memorandum by <u>September 19, 2022</u>. The written communication will contain any revisions to the application the CoC Grant Technical Review 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 submitted in e-snaps are due to the CoC on or before <u>September 22, 2022</u>.
- 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 <u>TCHC website</u> on <u>September 27, 2022</u>.

#### **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 2022 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 and the Special NOFO;
- 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 Special 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 June 22, 2022 and October 20, 2022.

#### RATING CRITERIA

Each Renewal and New Project application submitted will be rated against the criteria articulated in the Department of Housing and Urban Development's Rating and Ranking Tool and FY 2022 NOFO. An overview of the rating criteria that will be considered during the rating and ranking process is provided below. **Additionally, the CoC Rating and Ranking tool will be published in the weeks ahead before the submission date of project applications.** According to guidance from HUD, 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.

#### 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 and/or Low Barrier Implementation
- ✓ Documented, secured minimum match
- ✓ Application is complete and data are consistent
- ✓ Project Costs are eligible (24 CFR 578 Subpart D and Special NOFO)
- ✓ Acceptable organizational audit/financial review
- ✓ Active participation in CoC

#### HUD THRESHOLD CRITERIA

The HUD threshold requirements can be found in the Special NOFO Section V.C.3.

#### 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 Special 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 at a later date.

## New Projects

For new projects these criteria address:

- ✓ Experience
- ✓ Design of housing and supportive services
- ✓ Timeliness
- ✓ Documented organizational financial stability
- ✓ Project effectiveness
- ✓ Financial feasibility of project
- ✓ Cost per exit to permanent housing
- ✓ Application is complete and data are consistent
- ✓ Service to a high needs 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 support underserved populations
- ✓ Strategy to further fair housing and market housing and supportive services
- ✓ Assistance to clients to increase access to employment and non-employment cash resources
- ✓ Leveraging Healthcare Resources

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

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 A-133 audit reports as applicable, as well as performance standards on prior grants.

## APPEALS PROCESS

### DENIED OR DECREASED FUNDING

If an applicant wishes to appeal rating and ranking outcomes that resulted in denied or decreased funding, they must submit a letter of appeal to the chair of the CoC within 3 days of receiving their official notice outside of e-snaps. The governing body of the CoC will be convened to review any such appeal prior to <u>September 23, 2022</u> and will notify the appellant in writing of the results of the appeal.

# REJECTED PROJECTS

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 on September 20, 2022. The CoC's notification of rejection of the project in the local competition must be attached to the Solo Application. If the CoC fails to provide written notification outside of e-snaps, the Solo Applicant must attach evidence that it attempted to participate in the local CoC planning process and submitted a project application that met the local deadlines, along with a statement that the CoC did not provide the Solo Applicant written notification of the project in the local CoC competition. See Section X.C. in the NOFO for more information.