**FY2023 Georgia Balance of State CoC - Competition Certifications and Policy Addendum**

**Annual Competition**

The Georgia Balance of State (BoS) Continuum of Care (CoC) is issuing this “Competition Certifications and Policy Addendum” that is a required certification that must be submitted with ALL project review applications. This document addresses the FY 2023 BoS CoC policy, items related to project application scoring for Housing First and Low Barrier Housing, and assurance from applicants that all required certifications must be fully completed and electronically submitted in the Application or Applicant Profile within *e-snaps*.

The certifications below must be made by a member of the organization who has been duly authorized to make such commitments. This addendum must be received by DCA from ALL project applicants no later than the August 15, 2023 deadline for renewal applicants and August 16, 2023 deadline for new applicants in order for an application to be considered complete. It should be emailed to Tina Moore, CoC Coordinator (BoSMonitoring@dca.ga.gov).

**Bed Prioritization for Chronically Homeless Policy**

The BoS CoC is prioritizing homeless individuals and families experiencing chronic homelessness consistent with *Notice CPD 16-011:* *Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status.* Chronically homeless individuals and families should be given priority for permanent supportive housing beds not currently dedicated to this population as vacancies become available through turnover. Permanent supportive housing renewal projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance use disorder) must continue to serve those subpopulations, as required in the current grant agreement. However, chronically homeless individuals and families within the specified subpopulation should be prioritized for entry. The most current notice can be found at: <https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/>.

All renewal BoS CoC Permanent Supportive Housing (PSH) projects that do not already have 100% of their beds dedicated to people who are chronically homeless are required to prioritize at least 90% of their non-dedicated beds to people who are chronically homeless. Please note that as of the 2018, all renewal PSH project applicants have committed to prioritizing 100% of non-dedicated beds to chronically homeless individuals and families in previous competitions. And all new BoS CoC Permanent Supportive Housing (PSH) projects must dedicate 100% of their beds to people who are chronically homeless or operate as a DedicatedPLUS project.

[ ]  **I certify that I am aware of this policy requirement for PSH projects funded through the Balance of State CoC. (RRH projects, enter N/A) (Please initial)** \_\_\_\_\_\_\_\_\_\_\_\_

**Low Barriers to Entry**

Low barrier housing refers to allowing project entry to participants without any or many barriers or restrictions and prioritizes rapid placement and stabilization in permanent housing. This includes low or no income, current or past substance use, criminal records–with the exceptions of restrictions imposed by federal, state or local law or ordinance (e.g., restrictions on serving people who are listed on sex offender registries), and a history of domestic violence. Although not yet required, the BoS CoC, in line with HUD and USICH, encourages projects to adopt this service model. Please note that renewal applicants must meet, or improve, the level committed in previous competitions.

**Select applicable response:**

[ ]  **I certify that my agency will operate this project funded through the Balance of State CoC using a Low Barrier**

**approach. (Please initial)** \_\_\_\_\_\_\_\_\_\_\_\_

[ ]  **No, my agency will not operate this project funded through the Balance of State CoC using a Low Barrier approach. (Please initial)** \_\_\_\_\_\_\_\_\_\_\_\_

**Housing First**

Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold). Additional information regarding Housing First is on page 24 and in Section II.A.2 of the NOFO. Although not yet required, the BoS CoC, in line with HUD and USICH, encourages projects to adopt this service model. Please note, renewal applicants must meet, or improve, the level committed in previous competitions.

**Select applicable response:**

[ ]  **I certify that my agency will operate this project funded through the Balance of State CoC using a Housing First model. (Please initial)** \_\_\_\_\_\_\_\_\_\_\_\_

[ ]  **No, my agency will not operate this project funded through the Balance of State CoC using a Housing First model. (Please initial)** \_\_\_\_\_\_\_\_\_\_\_\_

**Georgia Balance of State CoC Written Standards Policy (Required)**

One of the requirements of each CoC is to establish and follow written standards for recipients and subrecipients for providing assistance with CoC Program funds. At a minimum, these written standards must include policies and procedures for evaluating individuals’ and families’ eligibility for assistance through the CoC Program, determining and prioritizing eligible individuals and families for transitional housing, rapid re-housing, and permanent supportive housing assistance, and determining the percentage and amount of rent program participants must pay while receiving rapid re-housing assistance.

The *Georgia Balance of State Continuum of Care Written Standards* were initially approved by the CoC Board on May 24, 2017, and approved as updated by the Standards, Rating, and Project Selection Committee on May 5, 2023.

[ ]  **I certify that my agency is aware of the *Georgia Balance of State Continuum of Care Written Standards* and will ensure the policies and procedures of each CoC-funded project have been updated in order to meet these standards, and these Written Standards are in practice within each project. (Please initial)** \_\_\_\_\_\_\_\_\_\_\_\_

**Georgia Balance of State CoC Violence Against Women Act (VAWA) Policy (Required)**

The Violence Against Women Act (“VAWA”) is a federal law that protects individuals who are survivors of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, sexual orientation, or gender identity. VAWA includes protections for survivors who are applying for or residing in covered housing programs. On March 15, 2022, the President signed into law the Consolidated Appropriations Act of 2022 (Pub. L. 117-103, 136 Stat. 49), which included the Violence Against Women Act Reauthorization Act of 2022 (VAWA 2022). VAWA 2022 reauthorizes, amends, and strengthens the Violence Against Women Act of 1994, as amended (VAWA) (Pub. L. 103-322, tot. IV, sec. 40001-40703; 42 U.S.C. 13925 et seq.). Many of VAWA’s amendments took effect on October 1, 2023. Section 605 of VAWA 2022 amends section 423(a) if the McKinney-Vento Homeless Assistance Act to add the following eligible Continuum of Care Program Activity:

Facilitating and coordinating activities to ensure compliance with [the emergency transfer plan requirement in 34 U.S.C. 12491€] and monitoring compliance with the confidentiality protections of [the confidentiality requirement in 34 U.F.C. 12491(c)(4)].

See section VI.B for more information on compliance with VAWA 2022 and section III.B.4.a.(3) of the HUD NOFO for more information on eligible VAWA costs. For general guidance on implementation of VAWA 2022, please also see [https://www.federalregister.gov/documents/2023/01/04/2022-28073/the-violence-against-women-act-reauthorization-act-of-2022-overview-of-applicability-to-hud-programs,](https://www.federalregister.gov/documents/2023/01/04/2022-28073/the-violence-against-women-act-reauthorization-act-of-2022-overview-of-applicability-to-hud-programs%2C) a notice HUD published in the Federal Register on January 4, 2023.

On January 4, 2023, the U.S. Department of Housing and Urban Development (“HUD”) published a notice in the Federal Register (“VAWA 2022 Notice”) in which HUD: (1) described how the VAWA 2022 amendments affect HUD’s programs; and (2) sought public comment through March 6, 2023 on certain provisions, to aid HUD in the development of regulations and program guidance. A copy of the VAWA 2022 Notice is available online at: https://www.federalregister.gov/documents/2023/01/04/2022-28073/the-violence-against-women-act-reauthorization-act-of-2022-overview-of-applicability-to-hud-programs.

On November 16, 2016, HUD published its VAWA final rule (81 FR 80798), which provides various protections to victims of domestic violence, dating violence, sexual assault, and stalking under the CoC Program and other HUD programs. The core statutory protections of VAWA also prohibit denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. Under the HUD Final Rule, the Georgia Balance of State Continuum of Care (BoS CoC), adopted policies on 6/20/17, to include provisions for protection of those aforementioned protected classes.

All CoC-funded projects must follow the *Georgia Balance of State CoC Violence Against Women Act (VAWA) Policies and Procedures* and be fully compliant. First-time renewal projects should be fully compliant by the time the local CPD Field Office issues the first grant agreement for a project in the CoC’s geographic area.

**Select applicable response:**

[ ]  **I certify that my agency will update our policies and procedures and ensure compliance with the VAWA Act of 2022, *Georgia Balance of State CoC Violence Against Women Act (VAWA) Policies and Procedures* and updated *Written Standards*, which expand the definition of the Category 4 definition of homelessness. (Please initial)** \_\_\_\_\_\_\_\_\_

**Projects Classified as DedicatedPLUS**

DedicatedPLUS projects must be permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals, households with children, and unaccompanied youth as defined in Section I.B.2.b.(7) of the FY 2023 HUD NOFO (pages 14-15).

NEW: A renewal project where 100 percent of the beds were dedicated to chronically homeless individuals and families, as described in Section I.B.2.b.(2), under the grant that is being renewed may either be reallocated as a DedicatedPLUS project or may continue as a renewal dedicating 100 percent of its beds to chronically homeless individuals and families. If the project is reallocated as a DedicatedPLUS project, the project must adhere to all fair housing requirements at 24 CFR 578.93.

PSH projects that were awarded as DedicatedPLUS in previous competitions are required to continue to include households with children to qualify as a DedicatedPLUS project in the FY 2023 CoC Program Competition. Additional guidance for DedicatedPLUS projects can be found on the HUD Exchange website at: <https://www.hudexchange.info/programs/coc/>.

[ ]  **I certify that I am aware of this policy requirement for PSH projects that reallocation is required to change the classification to DedicatedPLUS. (RRH projects, enter N/A) (Please initial)** \_\_\_\_\_\_\_\_\_\_\_\_

**Application Submission Assurances (Required)**

In addition to the requirement of applicants to fully complete and submit all required certifications in the Application or Applicant Profile within *e-snaps* as required:

* All project applicants must ensure their organization has a Code of Conduct that complies with the requirements of 2 CFR part 200 and is on file with HUD at <https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants>. If the organization’s Code of Conduct does not appear on HUD’s website, the project must attach its Code of Conduct that includes all required information to its Project Applicant Profile in *e-snaps*.
* The CoC Program requires a Certification of Consistency with the Consolidated Plan under 24 CFR 91.2. This certification means the proposed activities in the project applications are consistent with the jurisdiction’s strategic plan, and the location of the proposed activities is consistent with the geographic areas specified in the Consolidated Plan, of each jurisdiction. As Collaborative Applicant, DCA staff will work with applicants and the appropriate Consolidated Planning jurisdictions in order to combine all required form HUD-2991 certifications into once document (to be submitted by DCA and dated between May 1, 2023 and September 28, 2023). However, it is the **applicant’s responsibility to follow up with respective jurisdictions to ensure those jurisdictions have the project information they need to provide the certification(s) in a timely fashion**.

[ ]  **I certify that I am aware of these NOFO requirements, and that my agency will review/update Code of Conduct information and provide project information to related Consolidated Planning jurisdictions as required. (Please initial)** \_\_\_\_\_\_\_\_\_\_\_\_

[ ]  M**y agency is a Sub-Recipient and not the entity using *e-snaps*, however, I am aware that I need to provide project information to related Consolidated Planning jurisdictions as required. (Please initial)** \_\_\_\_\_\_\_\_\_\_\_\_

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| Signature of Authorized Representative[ ]  “X” indicates electronic signature submitted |
| Print Name |  |
| Title |  |
| Agency and Project Name(s) |  |
| Date |  |